Executive 13 July 2017

Item 11 – City of York Local Plan Annexes 1 – 11 (available online)

- Annex 1: Draft Strategic Housing Market Assessment, GL Hearn (SHMA)
- Annex 2: Draft Employment Land Review Addendum (ELR)
- Annex 3: Officers Assessment of Housing Sites following Preferred Sites Consultation (2016)
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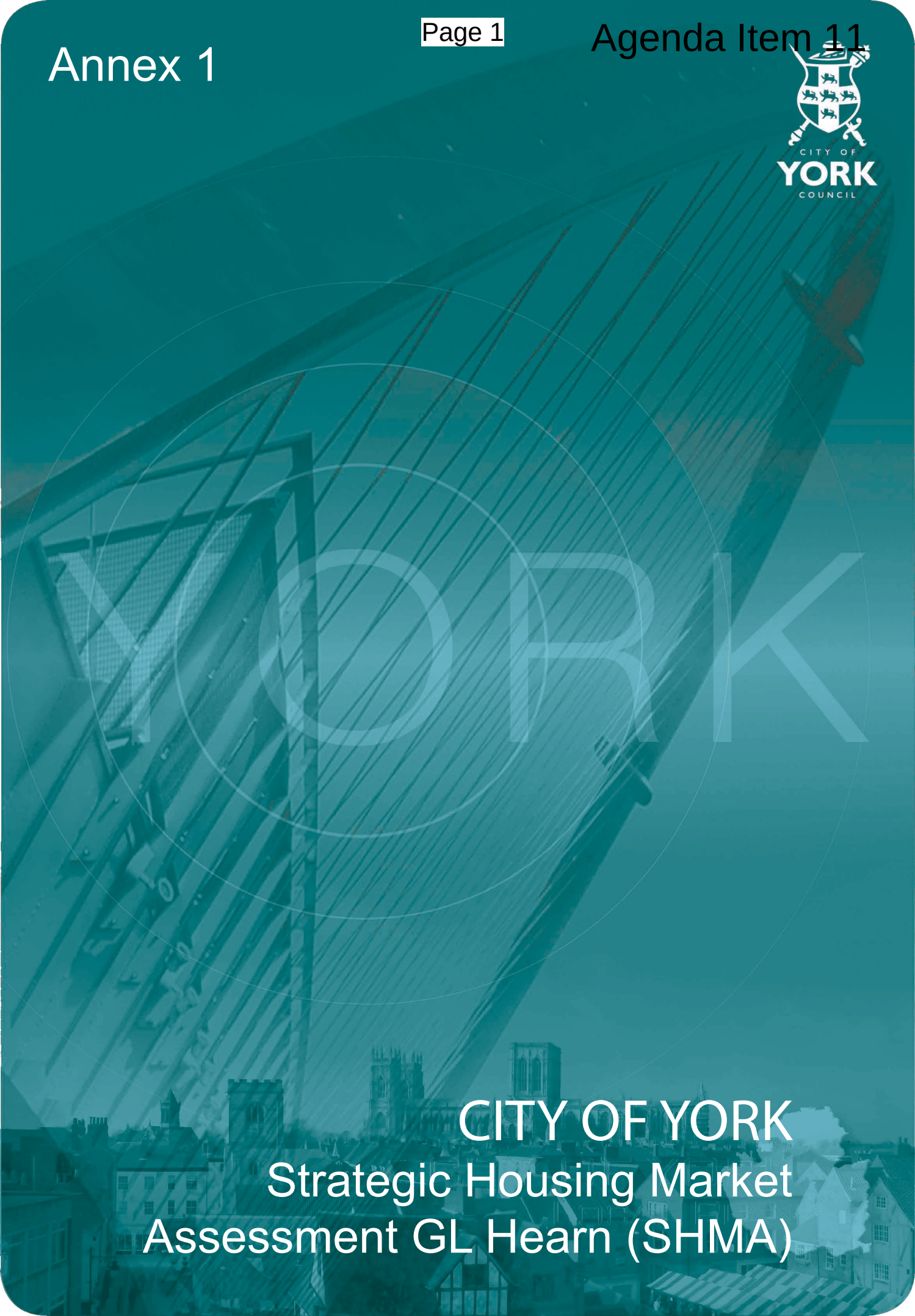
Annex 1

Agenda Item 11



CITY OF YORK
Strategic Housing Market Assessment GL Hearn (SHMA)

GL Hearn
Part of Capita Real Estate

City of York Council

Strategic Housing Market Assessment - Addendum Update

May 2017

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This document must only be treated as a draft unless it is has been signed by the Originators and approved by a Business or Associate Director.

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Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

1 PURPOSE

1.1 The purpose of this update addendum is to review the housing need in York taking into account of the latest demographic information. In particular we have reviewed the impact of the 2014-based Sub-National Household Projections (published July 2016) and the 2015 Mid-Year Estimates (published June 2016).

1.2 The addendum also looks at the latest evidence on market signals within the City. This is not a full trend based analysis but rather a snapshot of the latest evidence to be read in conjunction with the full SHMA document.

1.3 The report does not revisit the affordable housing need for the City, nor does it update analysis on the mix of housing required or the needs for specific groups. Again the full SHMA document should be referred to in these instances.

1.4 Within the appendix of this update we have summarised the most significant concerns relating to the housing need calculations raised as part of the local plan consultation process. These largely stem from the development industry and their planning consultants. Although it should also be noted that these refer to the previous methodology and are thus largely redundant.

2 DEMOGRAPHICS

2.1 To set this work in context the full SHMA document identified an objectively assessed need for the City of 841 dwellings per annum for the 2012-32 period. An addendum report published in the summer of 2016 identified a range of housing need between 706-898 dwellings per annum. The higher of this range included a questionable level of growth in student age population with the lower end using a ten-year trend scenario, which was equally questionable given that it did not reflect the most recent trends.

Demographic-led Projections

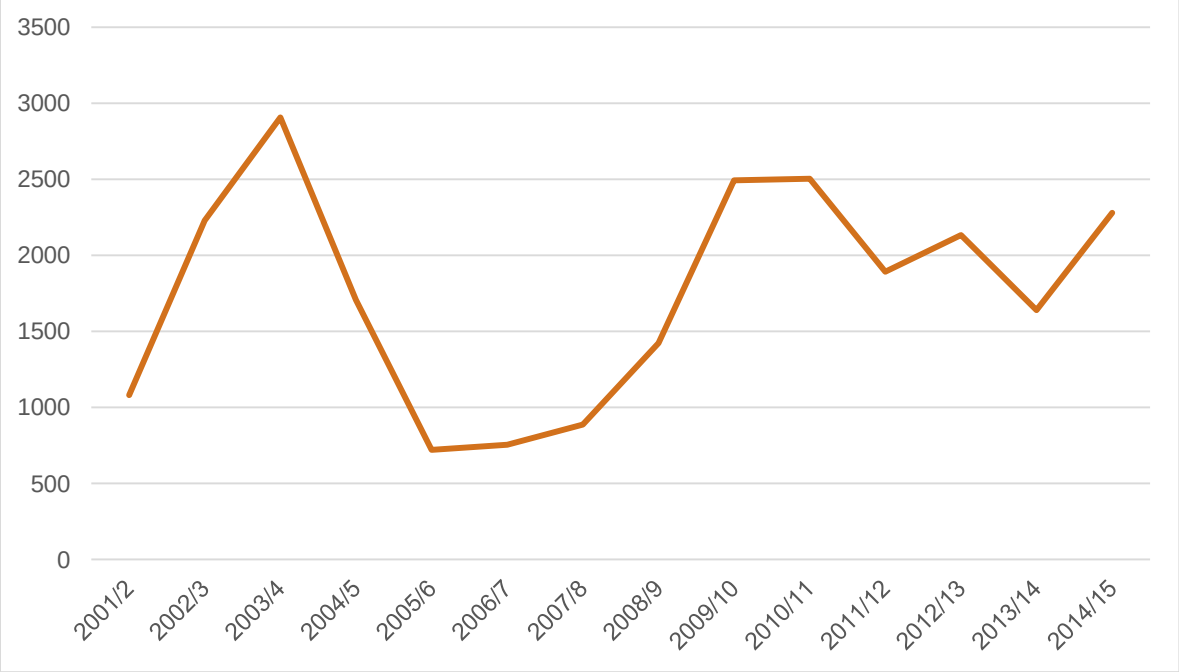
2.2 Overall, in the 2012-32 period, the 2014-based SNPP projects an increase in population of around 31,400 people (15.7%) in York; this is somewhat higher than the 2012-based SNPP (12.2%) and also higher than the main SHMA projection (which had population growth of 13.7%).

2.3 As has become convention, we have also considered longer term migration trend using the latest available evidence from the 2014-SNPP and the 2015 Mid-Year Estimate. The analysis of longer-term trends is suggested as an alternative scenario in the PAS technical advice note and the LPEG methodology.

2.4 Previous analysis has identified that levels of population growth have been variable over time and this is at least in part due to a variable level of recorded migration. As with other projections, migration levels are treated as variable within the model and changed depending on the age structure (both in the local area and areas from which people might be expected to migrate).

2.5 It is however notable that the level of need in York is driven by higher levels of migration in the recent past, particularly since the onset of recession in 2008. For example, average migration since 2008 has been 2,050 people per annum on average, compared with 1,470 in the seven years to 2008. This will have a notable impact on the assessed level of population growth and housing need in the CLG projections (which look at the 2008/9-14 period for migration information). Although its worth noting that the latest year's evidence presents a notable upturn.

Figure 1: Net migration 2001-15



Source: ONS

2.6 If we were to look at the population growth from the 10-year trends (2004/5-2014/15) then the growth would be considerably lower at 25,000 people over the 2012-32 period. This reflects the much lower level of net migration between 2005/6 and 2007/8. Increasing a base period for the migration assessment to 14-years would increase this figure up to about 27,800 persons.

2.7 There is also a notable level of Unattributable Population Change (UPC) in York in the 2001-11 period, the UPC in this case suggests that population growth and migration may have been over-estimated and if this is the case then this potentially has a knock-on effect on the projections. Hence taking account of UPC would show lower levels of need (as shown in the table overleaf).

Table 1: Projected Population Growth 2012-32 – range of demographic based scenarios

	Population 2012	Population 2032	Change in population
2014-based SNPP	200,018	231,374	31,356
2014-based SNPP (+ MYE)	200,018	231,769	31,751
10-Year Migration Trend	200,018	225,012	24,994
14-Year Migration Trend	200,018	227,808	27,790
10-Year Migration Trend (+UPC)	200,018	221,889	21,871
14-Year Migration Trend (+UPC)	200,018	224,081	24,063

Source: Derived from ONS data

2.8 While there is some merit at looking at longer term trends and UPC these do not provide robust enough evidence to justify such a notable departure from the official projections, particularly given the most recent year indicates an upturn in net migration. Migration trends suggest a general trend of increasing migration over time and the longer-term projections will not fully reflect this (although there are some concerns about projections of the student age population in the 2014-based SNPP).

2.9 Furthermore longer term trends could also been seen as a range with those adjusted for UPC. However UPC becomes a redundant issue in any projections based on data which is from 2007 onwards including the official projections. Hence, whilst there is merit in considering the trend based projection, they should not be given any greater weight than the figures emerging from official statistics.

2.10 The impact of Brexit on demographics cannot yet be quantified. This will largely be dependent on whatever deal, if any, is made in relation to the free movement of labour/access to the single market. Once more is known on this the Office of National Statistics will include what they believe to be the impact of it in their next set of national population projections.

2.11 The official population projections (particularly when the latest MYE are included) show level of population growth which is higher than any recent historic period or any trend based forecast of growth. It should therefore be seen as a positive step to consider these as the preferred population growth scenario.

2.12 We have therefore taken forward the official projections and those updated with the most recent date for further consideration. Any other sensitivity would result in a lower housing need but this would not be defensible given the very strong recent trends.

2.13 Any move away from the official projections need to be "justified on the basis of established sources of robust evidence". However a clear and evermore consistent migration trend is appearing and

could not fully justify any move away from the official projections. Doing so would risk under-estimating the true housing need in the City.

Household Growth

2.14 Consistent with the SHMA analysis, the next stage of the process is to apply age specific household formation rates to the population data. At the time of writing the latest information is from the 2014-based CLG household projections and so this data has been applied to the new projections. It should be noted that there is no material difference between this version of household forecasts and the household formation rates from the previous 2012-based version.

2.15 To be consistent with the SHMA, household formation rates from the Stage 1 release of CLG projections have been used. These are based on longer term trends and the stage 2 projections are constrained to these. This would indicate reliance on their use would be more robust.

2.16 Additionally, information about the institutional population needs to be applied (to turn population information into household population) and again data from the 2014-based household projections has been used. Council Tax vacancy rate data has also been used to convert household into dwellings – this shows a vacancy rate of 1.3%; lower than the equivalent SHMA figure (of 3.8%) which was based on 2011 Census data.

2.17 The analysis shows that with the 2014-based Household Projections that the level of housing need would be for 867 dwellings per annum – this is about 4% higher than the figure (of 833) derived in the SHMA for the main demographic based projection.

Table 2: Projected Household Growth 2012-32 – range of demographic based scenarios

	House-holds 2012	House-holds 2032	Change in house-holds	Per annum	Dwellings (per annum)
2014-based SNPP	84,270	101,390	17,120	856	867
2014-based SNPP (+ MYE)	84,270	101,366	17,096	855	866

Source: Derived from ONS and CLG data

2.18 Despite a higher population growth using the latest mid-year estimates takes the housing need down by a single dwelling to 866 dpa. This is due to changes in the age structure.

Improving Household Formation

2.19 Within the SHMA, analysis was also undertaken (as part of the market signals analysis) to recognise a modest level of supressed household formation – this essentially took the form of returning the household formation/headship rates of the 25-34 age group back to the levels seen in

2001 (which is when they started to drop). A consistent analysis has therefore been carried out applied to the projections with the table below showing relevant outputs.

2.20 With an uplift to the household formation rates of the 25-34 age group, the housing need (when linked to 2014-based projections when updated) increases to 873 dwellings per annum. When the mid-year estimates are included the housing need decreases to 871 dpa.

Table 3: Projected Household Growth 2012-32 – range of demographic based scenarios (with uplift to headship rates for 25-34 age group)

	House-holds 2012	House-holds 2032	Change in house-holds	Per annum	Dwellings (per annum)
2014-based SNPP	84,270	101,502	17,232	862	873
2014-based SNPP (+ MYE)	84,270	101,479	17,209	860	871

Source: Derived from ONS and CLG data

2.21 At 871 dpa the preferred population growth scenario (2014-based SNPP (+ MYE)) is similar to the upper end of the OAN in the SHMA addendum (898). However, this figure excludes any adjustment that might need to be made for economic growth nor would it improve affordability.

3 MARKET SIGNALS AND AFFORDABLE HOUSING NEED

3.1 We have undertaken a targeted updated to the market signals section looking using recently published data. This is not a full update, as many of the datasets used have not been updated since publication of the SHMA.

3.2 We have considered a single adjustment to address both of these issues as they are intrinsically linked. For example an improvement in affordability would inevitably reduce the demand for affordable housing.

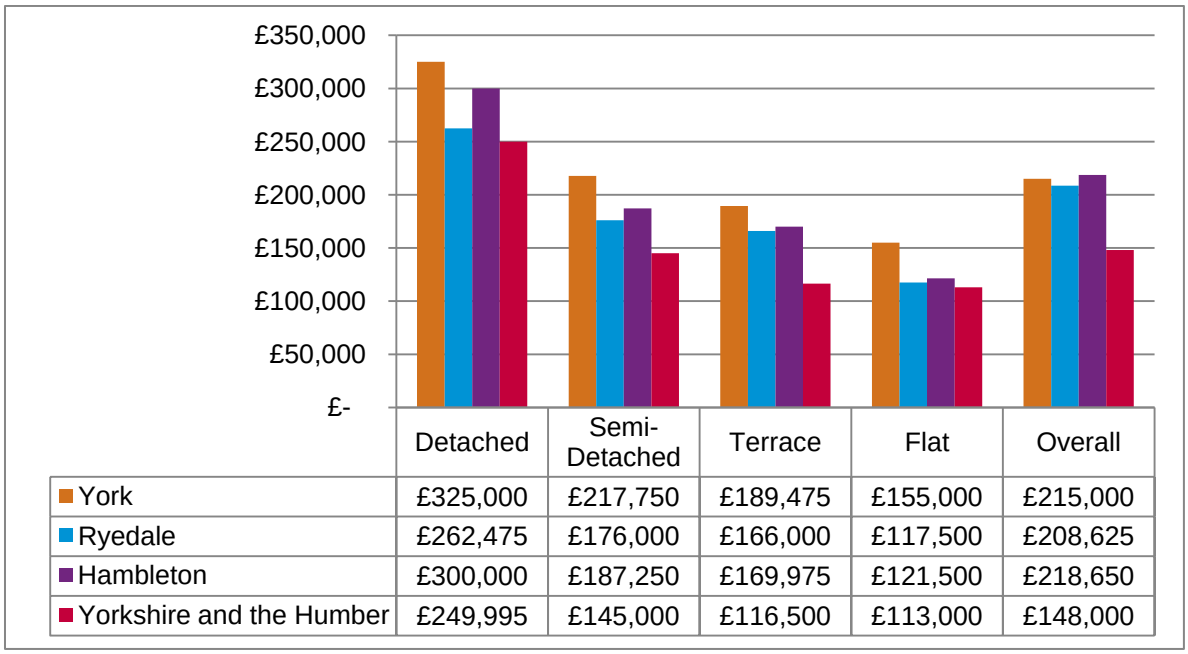
3.3 That said the update does not review affordable housing need but the situation is unlikely to have changed significantly from the SHMA. The SHMA identified a net affordable housing need of 573 dwellings. However large parts of this need is either existing households (who do not generate need for additional dwellings overall) or newly forming households (who are already included within the demographic modelling).

House Prices

3.4 The SHMA outlined significant house price growth in the HMA between 2001 and 2007. Since 2007, house prices nationally and locally have been very different due to the economic backdrop. This saw some initially falls in York followed by a longer period of stabilisation.

3.5 The SHMA reported that By Q4 2014 house prices in York had reached £195,000 which to that point was slightly lower than the previous quarter (£200,000). However, by Q2 2016 this had increased to £225,000. Again this was a notable increase since the previous quarter with the 8 month median figure for 2016 sitting at £215,000.

Figure 2: Median House Prices (Jan – Aug 2016)



	Detached	Semi-Detached	Terrace	Flat	Overall
York	£325,000	£217,750	£189,475	£155,000	£215,000
Ryedale	£262,475	£176,000	£166,000	£117,500	£208,625
Hambleton	£300,000	£187,250	£169,975	£121,500	£218,650
Yorkshire and the Humber	£249,995	£145,000	£116,500	£113,000	£148,000

Source: GLH Analysis: Land Registry Price Paid Data

3.6 In 2015 York's median detached house price is £276,500 this increased to £325,000 suggesting a strong recovery in the upper end of the market. For semi-detached properties, prices for York stood at £193,000 and have since increased to £217,000.

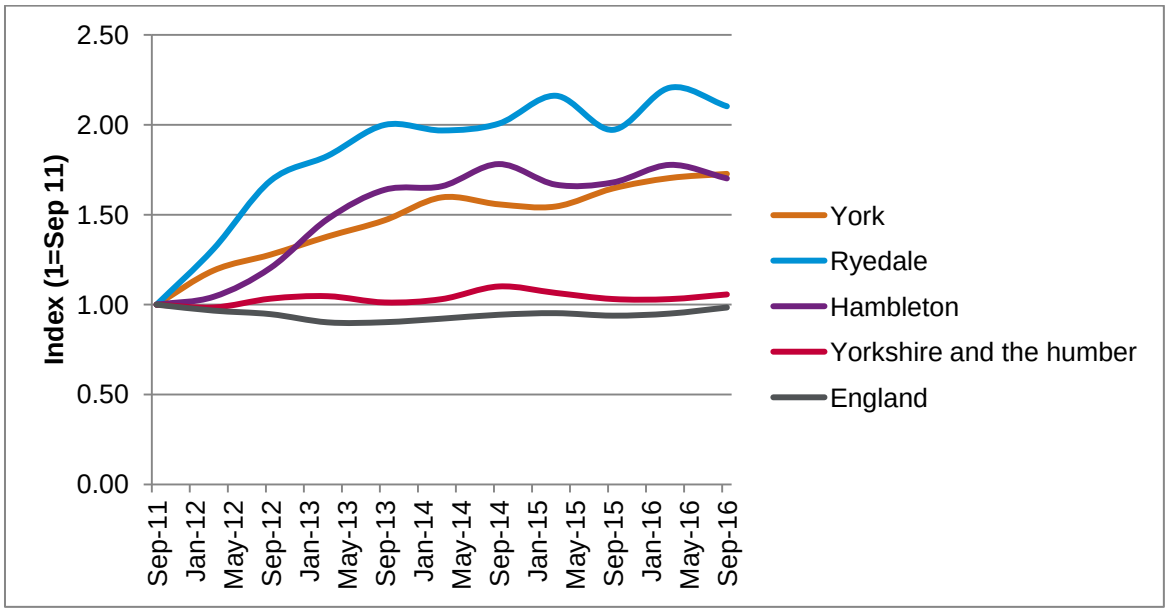
3.7 There is a similar situation for terraced houses. The median house prices in York also increased from £175,000 to £189,000. The median flat prices in York have also increased from £144,725 to £155,000. The 2016 median prices by type are illustrated in Figure 2 above.

3.8 The SHMA set out VOA median private rental data from March 2015 which showed the median rental price in Yorkshire and the Humber was £495 per calendar month (pcm) and £675 pcm in York and the England average was £600 pcm. However, the most recent data shows that England

has grown to £650 (+8%), while York has seen median rental prices increase to £700 (+4%). In contrast Price in the region only grew by 1% to £500 per month.

3.9 Figure 39 shows trends in the number of private rental transactions recorded by the VOA benchmarked against September 2011 figures. This shows a strong upward trend in the number of rental transactions in York although falling in the last six months. In York rental transactions are currently 73% higher than in September 2011 showing continued return to the longer term trend than seen in the previous SHMA. By comparison, in Yorkshire and the Humber rental volume are still slightly above (6%) past figures. Nationally, over this period there has been a slight downward trend.

Figure 3: Trend in private rental transactions (Sep 2011 – Sep 2014)



Source: VOA Private Rental Data

Affordability of Market Housing

3.10 We have considered evidence of affordability by looking specifically at the relationship between lower quartile house prices and lower quartile earnings. As of 2015 the lower quartile house prices in York are 8.9 times higher than lower quartile earnings. The equivalent figures for Ryedale and Hambleton are 8.8 and 8.9 respectively.

3.11 As a general observation, we can see that across all areas the affordability of property has worsened quite markedly over the past 15 years. However much of this growth was prior to 2005, and there has been limited change in affordability over the last decade, particularly in York.

Table 4: Comparison of lower quartile and median affordability (2015)

	Median Ratio	Lower Quartile Ratio
England	7.6	7.0
Hambleton	8.8	8.9
Ryedale	8.7	8.8
York	8.3	8.9

Source: DCLG Housing Market Live Tables

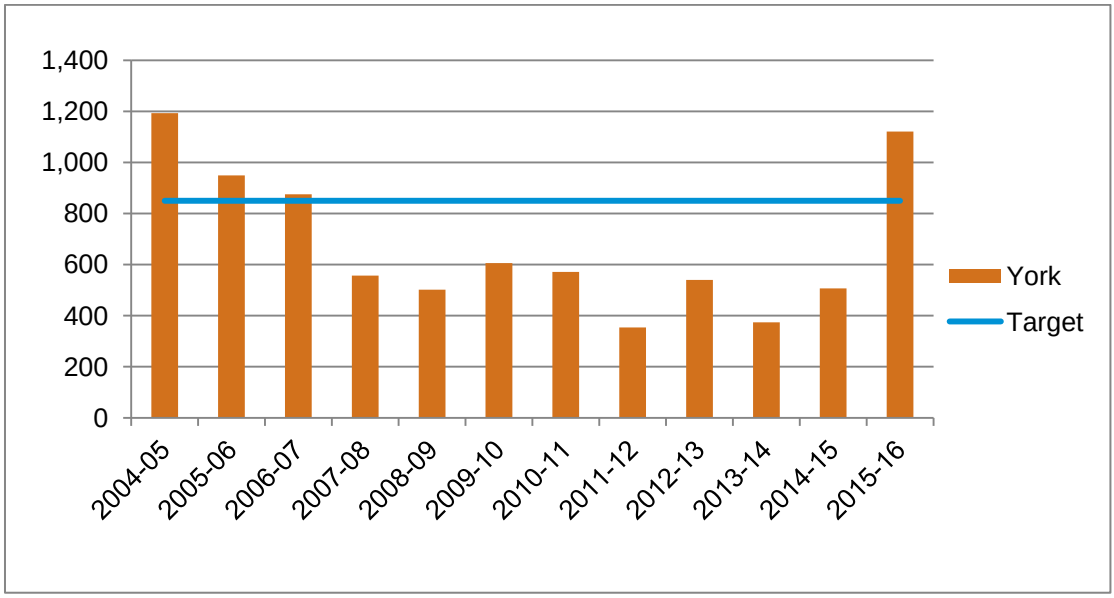
3.12 Nationally, a combination of the deteriorating affordability of market homes, restricted access to mortgage products and a lack of social housing supply over the 2001-11 decade has resulted in fewer households being able to buy and increased pressures on the existing affordable housing stock. This has resulted in strong growth in the private rented sector as households are being forced to rent longer. This is exacerbated by the fact that affordability is worse in York within the lower quartile prices compared to the median prices.

3.13 We have examined housing completions data for York dating back to 2004/05 and set these against the annual housing target from 2004/05 to 2015/16. With the exception of the last year housing delivery in York has missed the target each year since 2007. Overall target for these years was missed by 20% which equals 2,051 units below the target level. The York Target is taken from the Yorkshire and Humber Plan Regional Spatial Strategy (adopted in 2008).

3.14 This analysis highlights a shortfall in provision against previous targets. The PPG states that 'if the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan'. The PPG also urges that the assessment will need to reflect the consequences of past under-delivery of housing'. It is considered that under-delivery may have led to household formation (particularly of younger households) being constrained. This point is picked up in this report which uses a demographic projection based analysis to establish the level of housing need moving forward.

3.15 The finding of a past under-delivery of housing may suggest that there is a 'backlog' of need which requires adding on to an assessment of need moving forward. However, it is considered that this past under-delivery is not a discrete part of the analysis but is one of the various market signals which indicate a need to increase provision from that determined in a baseline demographic projection. As noted in the paragraph above it is recognised that this market signal will require upward adjustment through consideration of migration and household formation rates rather than just a blanket increase based on the level of 'shortfall'.

Figure 4: York – Housing Supply vs Target (2006/07 – 2013/14)



Source: Authority Monitoring Reports

3.16 Such an approach can be supported by a recent High Court ruling; Zurich Assurance Ltd vs Winchester City Council and South Downs National Park Authority of 18th March 2014. In this the claimant (Zurich) considered that the Inspector at the Local Plan EiP had made a 'methodological error' in his assessment of the proposed housing requirement. In this regard, the Honourable Mr Justice Sales stated that:

> *"According to Mr Cahill's suggestion, the modellers in 2011 should have begun by saying that there was a shortfall of 854 homes against a previous estimate and then should have added that on to their own modelled estimates for new homes for 2011-2031 to produce the relevant total figure. In fact, none of them proceeded in that way, and rightly so. In my view, they would clearly have been wrong if they had tried to do so. Their own modelling for 2011-2031 is self-contained, with its own evidence base, and would have been badly distorted by trying to add in a figure derived from a different estimate using a different evidence base. That would have involved mixing apples and oranges in an unjustifiable way." [§95, Case Number: CO/5057/2013].*

Affordable Housing Need

3.17 The City of York Council currently have an affordable housing policy of up to 30%. The SHMA identified a net affordable housing need of 573 dwellings. Based on this level of need and the current policy the City would require to deliver 1,910 dwellings per annum. To put this in context the City has only delivered more than 1000 homes once since 2004-5. Using a lower policy target would result in an even higher need.

3.18 While there is clearly an affordable housing issue in the City may of the households in need are already in housing (just housing that is not suitable for some reason such as overcrowding) and therefore do not generate a need for additional dwellings.

Market Signals and Affordable Housing Need Conclusions

3.19 On balance, the market signals are quite strong and there is a notable affordable housing need. Combined these would merit some response within the derived OAN. This is a departure from the previous SHMA and the Addendum which did not make any market signals or affordable housing adjustment.

3.20 There has been some debate over the last few years regarding the response to affordable housing need, specifically whether affordable housing need is a component of the OAN or if it is a separate requirement.

3.21 In particular the Kings Lynn and West Norfolk Council vs. SSCLG and Elm Park Holdings case which involved the Council's challenge to an inspector's granting of permission for 40 dwellings in a village. Although much of the case was about the approach to take with regards to vacant and second homes, the issue of affordable housing was also a key part of the final judgment.

3.22 Focussing on affordable housing, Justice Dove considered the "ingredients" involved in making a FOAN and noted that the FOAN is the product of the Strategic Housing Market Assessment (SHMA) required by paragraph 159 of the NPPF. It is noted that the SHMA must identify the scale and mix of housing to meet household and population projections, taking account of migration and demographic change, and then address the need for all housing types, including affordable homes.

3.23 He continued by noting that the scale and mix of housing is 'a statistical exercise involving a range of relevant data for which there is no one set methodology, but which will involve elements of judgement'. Crucially, in paragraph 35 of the judgment he says that the 'Framework makes clear that these needs [affordable housing needs] should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice'.

3.24 This is an important point, given the previous judgements such as in Satnam and Oadby and Wigston where the inspector or judge suggested a mechanical uplift of the OAN based on the affordable housing need and the affordable housing policy. And indeed in relation to Oadby and Wigston he notes that 'Insofar as Hickinbottom J in the case of Oadby and Wigston Borough Council v Secretary of State [2015] EWHC 1879 might be taken in paragraph 34(ii) of his judgment

to be suggesting that in determining the FOAN, the total need for affordable housing must be met in full by its inclusion in the FOAN I would respectfully disagree. Such a suggestion is not warranted by the Framework or the PPG'.

3.25 Therefore, this judgement is clear that an assessment of affordable housing need should be carried out, but that the level of affordable need shown by analysis does not have to be met in full within the assessment of the OAN. However, should still be a material consideration in determining the OAN.

3.26 Taking the market signals and affordable housing need into account there is some justification of a response to affordable housing need in the City. As established there are also some market signals challenges across the City which require a response. Any adjustment should however be considered as addressing both elements.

3.27 The PPG sets out that the scale of such an adjustment should be *"a level that is reasonable"*. SHMAs around the country have generally applied adjustments to improve affordability of up to 20%, We are aware of only one exception to this, in Cambridge (where a 30% adjustment has been recommended). Over the last few years or so different Government Planning Inspectors have taken a range of views on this matter, including:

- Mendip (October 2014) – *'these findings indicate that trends in Mendip sit fairly comfortably alongside county, regional and national trends and do not, therefore, justify an upward adjustment of the housing numbers that came out of the housing projection'*
- Eastleigh (November 2014) – *'It is very difficult to judge the appropriate scale of such an uplift. I consider a cautious approach is reasonable bearing in mind that any practical benefit is likely to be very limited because Eastleigh is only a part of a much larger HMA. Exploration of an uplift of, say, 10% would be compatible with the "modest" pressure of market signals recognised in the SHMA itself*'.
- Uttlesford (December 2014) – *'While evidence on some of these topics is patchy. Taking them in the round and without discussing them in detail here, I consider that an uplift of at least 10% would be a reasonable and proportionate increase in the circumstances of Uttlesford'*
- Stratford-on-Avon (March 2015) – Despite the area show strong evidence of strong affordability pressures the inspector concluded that *'On balance I conclude, despite the SHMA's finding that there is a case for an uplift, that an upward adjustment in housing numbers has not been justified in terms of market signals in the District'.*
- Crawley (May 2015) – Despite the Council themselves seeking to make a market signals adjustment the inspector concluded that he was *'not convinced that the market signals uplift is justified by the evidence, for the various indicators reveal a situation in Crawley which is not as severe as in other North West Sussex authorities, and one that has not worsened in recent years'*.
- Cornwall (June 2015) – The same Inspector as the Eastleigh Local Plan inquiry suggested that *'National guidance is that a worsening trend in any relevant market signal should result in an uplift. But for the reasons given below I do not consider that I should require such an uplift to be made for Cornwall at this time'*

3.28 Given the balance of judgement it would appear that a 10% adjustment could be justified in York on the basis of the previously established affordable housing need the updated market signals evidence.

3.29 There is also some debate as to whether a market signals adjustment should be made relative to the demographic need, or whether it should be applied on top of adjustments to support economic growth. Although largely redundant in York the argument in favour of the former is that it is intending to 'oversupply' housing in order to improve affordability; whilst in respect of the latter, it is that households are required to live in additional homes and that additional housing above the demographic starting point would potentially support additional workforce growth.

3.30 In line with the approach outlined in the PPG we consider it is most appropriate to make or consider an upward adjustment to the demographic starting point in order to respond to housing market signals and to enhance affordable housing delivery.

3.31 As set out in the previous Chapter the starting point of the demographics which were the official projections which supplied a housing need of 867. Therefore a 10% market signals and affordable housing need uplift would be 87 dpa. Overall this step increased the OAN in in the City to 953 dpa for the period 2012 to 2032. This would also incorporate an improvement to household formation rates.

3.32 An OAN set at this level would improve affordability in the City. The intended impact would be that household formation rates would improve as housing supply grows without increasing the population. This would allow more children to leave the parental homes, reduce concealed households and decrease shared households and housing in multiple occupation.

4 ECONOMIC GROWTH

4.1 The full SHMA examined economic growth in the City using four different forecasts for job growth. Three of these were from Oxford Economics (OE) including bespoke forecasts procured by Arup on behalf of the Council. The OE forecasts set out a jobs growth of between 609 and 868 jobs per annum the higher of which resulted in a housing need of 814 dpa. The Arup work and therefore the bespoke forecasts have not been updated.

4.2 The final forecast was from the Yorkshire and Humber Regional Economic Model. This set out a jobs growth of 789 dpa for the period 2012-32. This resulted in a housing need of 797 dpa. The later version of the REM substantially reduces this growth to 594 dpa. Therefore we would expect the housing need to also reduce further.

4.3 This report presents no alternative to the work in the original SHMA however it is clear in all cases that the housing need required to meet the economic growth is lower than the demographic need. Furthermore evidence of more recent forecasts suggest that the economic growth will be even lower than anticipated.

4.4 Therefore on balance, there is unlikely to be any justification for an uplift to housing numbers in the City to support expected growth in employment. The uplift for market signals would also see the likelihood for an economic uplift reduce.

5 CONCLUSIONS

5.1 In line with the PPG our assessment starting point are the latest official projections. At the time of publication these were the 2014-based household projections. Including an allowance for vacant homes these result in a need for 867 dpa. Inclusion of the most recent mid-year estimates within the calculations reduces this figure by 1 dpa.

5.2 A review of longer term trends suggests that the official projections are showing a higher level of need than if longer term migration trends were used. While this arguable could reduce the OAN any movement away from the official projections needs to be "justified on the basis of established sources of robust evidence". No such evidence is apparent as the latest data appears to show net migration increasing once more.

5.3 Furthermore there is also the clear desire of the Government to boost housing delivery, and therefore setting an OAN that is below the most recent official projections while justifiable might be difficult to support.

5.4 There is however an apparent continued suppression of household formation rates within younger age groups within the official projections. In order to respond to this we have increased the household formation rates in this age group to the levels seen in 2001. The housing need (when linked to 2014-based projections) increases to 873 dwellings per annum. When the mid-year estimates are included the housing need decreases to 871 dpa. This should be seen as the demographic conclusions of this report.

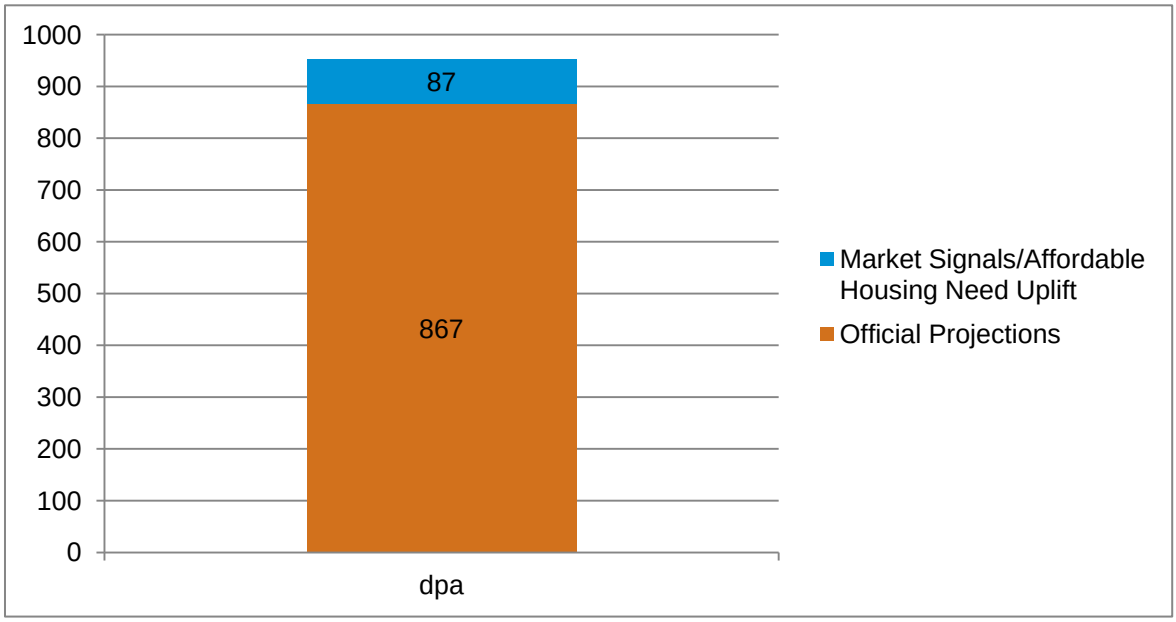
5.5 Although we have not undertaken a full update to the analysis of economic growth all previous analysis provided a housing need lower than the most recent demographic evidence. Furthermore the most recent projections indicated a substantial reduction in potential economic growth in the City. There is therefore no justification for an uplift to the OAN on the basis of economic need.

5.6 In response to both market signals and affordable housing need we have advocated a 10% uplift to the OAN. In line with the PPG this was set against the official starting point of 867 dpa. The resultant housing need would therefore be 953 dpa for the 2012-32 period.

5.7 The level of housing need identified is someway higher than the previous SHMA reflecting the increased starting point but also the inclusion of a market signals uplift. This OAN would meet the demographic growth in the City as well as meet the needs of the local economy.

5.8 In addition the uplift above the official projections will improve local affordability issues allowing for improvements to household formation rates as well as deliver an increased amount of affordable housing. The derivation of the OAN for York is set out in the figure below.

Figure 5: Derivation of OAN for York (Dwellings Per Annum (2012-32)



5.9 The official projections should be seen a starting point only and housing delivery at this level (867 dpa) would only meet the demographic growth of the City. It would not however address the City's affordability issues.

5.10 Without the 10% uplift for market signals/affordable housing need the City's younger population would fail to form properly. This would result in greater numbers residing with parents or friends or in share accommodations such as HMOs.

APPENDIX A: Consultation Responses

5.11 This appendix seeks to comment on the responses received by the City of York Council in relation to housing need. The City Council received twelve substantial responses, which in part relate to housing need. This section is not an attempt to response to every point raised on a line-by-line basis, it does however respond to the most substantive or oft repeated comments which have been received. This section does not respond to any comments in relation to land supply or the housing requirement as set out in the local plan. Nor have we provided a critique of alternative assessment of need.

5.12 The twelve responses were made by the following groups:

- Barton Wilmore on Behalf of Barratt and David Wilson Homes;
- DPP Planning on behalf of a landowner;
- Gladman Development Limited;
- Nathanial Lichfield and Partners on behalf of Linden Homes, Persimmon Homes, and Taylor Wimpey;
- Nathanial Lichfield and Partners on behalf of Shirethorn Ltd;
- Regeneris on behalf of Barwood Land;
- Turley on Behalf of JJ Gallagher Ltd; and
- Understanding Data for Sandby (York Ltd) and Oakgates/Caddick Groups
- WYG Planning on behalf of Pilcher Homes Ltd;
- York, North Yorkshire & East Riding Local Enterprise Partnership;
- York and North Yorkshire Chamber of Commerce;

Demographics

The SHMA did not use the latest available data i.e. the 2014-based projections or the 2015 MYE

5.13 The SHMA used the latest available evidence at the time of publication. This update includes use of the latest demographic projections (2014-based) as well as the latest 215 Mid-Year Estimate.

The official projections should be a minimum and should not be deviated from or adjusted downwards.

5.14 The guidance gives a specific example of where a downwards adjustment should be made and therefore this point is not something that can be accepted as true.

5.15 We have used the latest official population projections as a starting point and while incorporating the mid-year estimates point to a lower need this is only marginal. Furthermore the revised methodology takes this figure onwards and makes subsequent upwards adjustments.

5.16 The OAN derived is also likely to be at the upper end of the range of need given the sensitivities around longer term trends.

The OAHN is significantly lower than the 2014-based SNPP demographic starting point

5.17 This continues the point above and is no longer relevant.

GL Hearn should recognise the reduction in HFR from the 2008-based projections which reflect the long term position.

5.18 The 2008-based HFR have been largely discredited as being too optimistic. The methodology recognises work carried out by the Cambridge Centre for Housing and Planning Research (CCHPR) in a September 2013 study for the Town and Country Planning Association (TCPA) – *new estimates of housing demand and need in England, 2011 to 2031*. In particular this notes:

"The central question for the household projection is whether what happened in 2001 – 11 was a structural break from a 40-year trend; or whether household formation was forced downwards by economic and housing market pressures that are likely to ease with time. At the time of the 2011 Census, the British economy was still in recession and the housing market was depressed. The working assumption in this study is that a considerable part but not all of the 375,000 shortfall of households relative to trend was due to the state of the economy and the housing market. 200,000 is attributed to over-projection of households due to the much larger proportion of recent immigrants in the population whose household formation rates are lower than for the population as a whole. This effect will not be reversed. The other 175,000 is attributed to the economy and the state of the housing market and is assumed to gradually reverse."

5.19 On the basis of this analysis it can broadly be suggested that half of the lack of expected households is due to market factors with roughly half attributable to other issues (notably international migration) and hence any reliance on 2008-based household formation rates is likely to be questionable. We have instead used a known historical benchmark.

5.20 Furthermore by increasing the housing need by 10% for market signals then this will increase housing provision without increasing the populations. Therefore unless there is a notable increase in vacant homes it will have the inevitable consequences of increasing household formation rates.

GL Hearn overstate the issue of student growth and rejection of the 2014-SNPP is wholly unjustified,

5.21 We no longer adjust the OAN for this factor although the longer term trends do point to a lower need. This suggests the OAN is likely to be at the upper end of any range. Furthermore the Council have informed us that the University growth is likely to be slower that first anticpated.

GL Hearn should provide further evidence as to how their model generates lower population growth levels, from higher long term migration figures

5.22 Our model is a dynamic model. It is likely that alternative interpretations will be using a fixed level of migration whereas in reality ONS are projecting a reduction in net migration over time (in part due to age structure changes - internal migration and also due to reducing levels of international migration).

5.23 The 10-year projection averaged migration of 1,673pa compared with 2,039 in the SNPP reference period. Therefore it is unlikely that the housing need taking this forward would be lower than the official projections.

There is no review of the wider FE sector or wider education sectors

5.24 The wider FE and education sectors are unlikely to generate a need for additional housing attendees at these establishments are likely to be residing within the area. There is also limited data available relating to education establishments outside the Higher Education Statistics Authority.

Economics

The SHMA does not set out the job growth likely to result from any of the demographic projections

5.25 There is no requirement for the SHMA to do so. However the labour force will exceed that required from the forecasted job growth.

The Economic Forecasts are out of date

5.26 The economic forecasts have consistently shown a lower level of housing need resulting from economic growth than the demographic need. This is likely to continue to be the case with forecasts showing an ever more pessimistic view of job creation as a result of Brexit

The SHMA presents a supressed picture of likely economic growth

5.27 The SHMA reflects the forecasts as set out by a number of robust data sources. These all pre-date Brexit with evidence of more recent forecasts showing lower growth still.

We have not provided detail on how it has translated the economic projections into its model through the integration of commuting ratios, unemployment or economic activity rates

5.28 These outputs are integrated within the forecasts. Commuting patterns are maintained and economic activity rates decline, albeit that for some age groups (most notable those aged over 60) they increase. The actual formulas for these calculations are not within our control. However we have tested the outputs and they seem reasonable,

We should not be using the integrated assumptions relating to Economic Activity rates, rather we should be using the OBR forecasts

5.29 The OBR employment rates are national dataset and cannot be robustly applied at a local level. They are also based on finite population growth at a national level combined with much lower employment growth. As such they show a much lower level of employment rate change than the forecasts which we base our assessment on.

5.30 If the OBR rates were to be adopted locally then so too must there assumptions on employment growth, which would markedly reduce the jobs growth figure in York again.

Market Signals

The SHMA underplays the market signals pressures within the Housing Market Area.

5.31 We have now applied an uplift of 10% within the revised report. This would result in improvements headship rates as supply would be boosted without impacting demand i.e. no further population growth.

Adjustments to headship rates have been conflated with the uplift for market signals.

5.32 The Headship Rate adjustment will boost supply without impacting demand. Hence the market signals adjustment will inevitable improve headship rates.

The Market Signals uplift is too precise

5.33 We have now applied an uplift of 10% within the revised report. This would result in improvements headship rates as supply would be boosted without impacting demand i.e. no further population growth.

The uplift should have been greater e.g. as with Eastleigh and Uttlesford a 10% or as with Canterbury a 30% uplift should be applied

5.34 We have now applied an uplift of 10% within the revised report. As set out in this report there have been a range of judgements on this matter but the balance of which is for a 10% adjustment.

Affordable Housing Need

The City Council should be seeking to meet the affordable housing need in full.

5.35 In order to meet the affordable housing need in full this would require an unsustainable level of housing growth. The reality is that much of the affordable housing need arise from households already within housing and therefore do not generate a need for additional housing.

5.36 The Kings Lynn High Court judgement also sets out that there is no requirement for local authorities to meet their affordable housing needs through increases to the OAN as these are separate and distinct calculations.

No explicit consideration or uplift applied in respect of delivering more homes to meet the needs of households in affordable housing need.

5.37 The methodology has changed and our market signals uplift will also go some way to addressing those in affordable housing need. This is because more homes will mean delivery of more affordable housing.

GL Hearn has not responded properly to affordable housing need within York in the way that the Kings Lynn judgement recommends

5.38 The methodology has changed and our market signals uplift will also go some way to addressing those in affordable housing need. In that it is now a material consideration for the OAN.

We should not be expecting the PRS to meet the affordable housing need.

5.39 We do not include any consideration in our calculation that the PRS will meet affordable housing need.

Other

The SHMA does not take into account the recommendations of the Local Plans Expert Group

5.40 The Local Plan Expert Group is not guidance and there is no certainty that it will become so.

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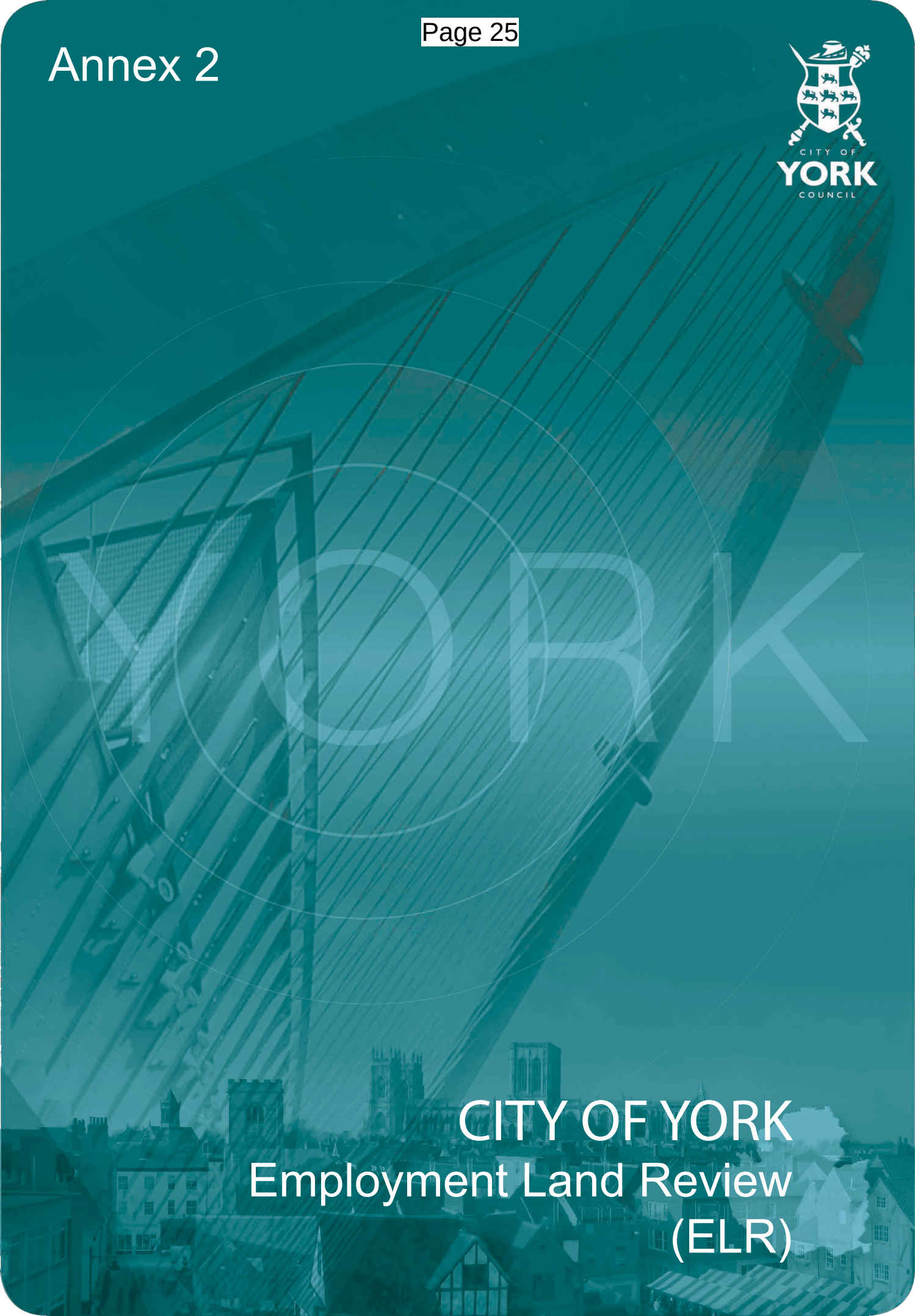
Annex 2



CITY OF YORK
Employment Land Review (ELR)

Draft Employment Land Review

For

10th July 2017 Local Plan Working Group
13th July 2017 Executive

1.0 Introduction

1.1 This paper provides an update to the Employment Land Review (ELR) in July 2016 which was part of the Local Plan Preferred Sites Consultation between 18 July and 12 September 2016. The document is not meant as a replacement to the original Review, rather an update on a number of matters for which there has been newer evidence available or specific feedback through the consultation since the original ELR was produced. On this basis, the update refreshes a number of areas as follows:

Objectively assessed development needs

- Sensitivity testing econometric projections against latest forecasts

Assessing the need and demand for employment land

- Reflecting the new Local Plan period of an additional 2 years
- Factoring in change of supply up to April 2017
- Summarising the impact of the above on land supply requirements
- Further explanation of the approach to change of use trends

The Land Supply

- Economic assessment of additional sites
- Response to consultation feedback about choice and scale of allocated sites
- Updated policy for and site allocation for provision of employment land (EC1)

1.2 This update should be read alongside the ELR (2016).

2.0 Objectively Assessed Development Needs: Sensitivity testing econometric projections against latest forecasts

2.1 The Employment Land Review (ELR) in July 2016 used econometric projections by Oxford Econometric (OE) projections from May 2015 as the forecast upon which it based assumptions around demand for employment land over the Local Plan period. As the plan progresses there is an opportunity to sensitivity test the original figures against the most recent econometric projections to ensure the plan meets the demand forecast. It is also an opportunity to update the need and demand for employment land. This update should be read alongside the ELR (2016).

2.2 It should be noted from the outset that econometric forecasts are updated frequently and so are subject to change either up or down or in relation to their sectoral breakdown according to date or forecasting methodology. Therefore the fundamental question is not about getting the 'perfect' up-to-date jobs projection to re-calculate every assumption, but to ensure that the land supply allocated has the flexibility to meet what evidence suggest that will happen with the local economy and it is not wildly out. This is one of the reasons for a degree of intrinsic flexibility between demand figures and land supply: so that newer evidence does not fundamentally affect a long term Plan unless it is indeed a fundamental shift in growth expectations.

2.3 To sensitivity test the original projections, the latest Experian forecast used within the Regional Econometric Model (REM) have been used for comparison. While both econometric models use national forecasts applied through a set of assumptions as to the breakdown, the assumptions differ slightly. Neither are more accurate than the other, only different assumptions about what could happen with the economy over

the next 15 to 20 years. For the purposes of sensitivity testing projections, it is important to ensure there is sufficient flexibility within the land supply for a range of scenarios rather than an exact single figure which one can precisely plan to with complete certainty. The Experian model in the REM is used across West and North Yorkshire, and given increased regional working around planning and forecasting, and the requirement to easily monitor updated projections as they become available over the Local Plan period, this is the most appropriate model for sensitivity testing moving forward.

Baseline Forecasts

2.4 Table 1 on the following page outlines the differences between the baseline forecasts. Like the original ELR, the sensitivity testing of forecasts compares data between 2015 and 2031. However, it should be noted that the figures for the Local Plan period take into both account actual growth before that point and are extended beyond based on a factor of the baseline, so for the figures upon which land supply is based see 2.14.

Table 1: Comparison Forecasts Between OE Baseline and REM Figures

	Oxford Economics baseline - May 2015 (previous baseline forecast)	Experian/REM - December 2016 (most recent data) rounded to the nearest 100 jobs
Total projected jobs growth in primarily B1a associated sectors (2015-2031)	5,087	3,700
Total projected jobs growth in primarily B2/B8 associated sectors (excluding decline in manufacturing) (2015-31)[1]	1,984	1,100
Full sector jobs growth breakdown		
Accommodation, food and recreation	2,171	3,300
Agriculture, forestry and fishing	-108	-200
Construction	1,156	500
Extraction and mining	0	0
Finance and insurance	49	500
Information and communication	416	200
Manufacturing	-1,143	-300
Professional and other services	4,622	3,000
Public Services	352	4,600
Transport and storage	828	600
Utilities	-23	200
Wholesale & retail	1,487	500
Total projected jobs growth (2015-2031)	**9,807**	**12,900**

2.5 Again, it is worth noting that for the employment land review, it is fundamentally about determining whether the land supply is sufficient to deliver all scenarios rather than establishing a new model for what will happen with the economy or comparing which is more 'accurate'. As can be seen from the above figures, in relation to B1a/B2/B8 land which the Employment Land Review is concerned with there is slightly lower requirements from the REM model than the baseline forecasts. Therefore, the original projections provide sufficient headroom for either scenario occurring.

[1] Land allocation to 'primarily' B1A and B2/B8 uses is simplified, but paints an accurate overall picture based on assumptions detailed in the ELR.

2.6 Nevertheless, it is perhaps worth highlighting some of the differences in figures between the two different models and dates. Looking at a number of iterations of the Experian Model used in REM, the main fundamental difference is that this anticipates greater expansion of social care and health jobs to meet an aging population; where as the Oxford model anticipates a more consistent size for 'Public Service' jobs, with the majority of growth in care offset by a decline in wider public service jobs within Local Government and Government departments, and no growth within the education sector. This therefore constitutes the vast majority of the overall increase in number of jobs.

2.7 Looking at the Experian projections in more detail indeed shows a continued decline in public administration jobs in the city, but the highest public service jobs growth within social care and health. This will be due to assumptions in the models nationally rather than at a local level around the anticipated growth in health and social care. While both models share a common broad makeup (combining national and regional forecasts with local historic data, they vary in applying different macro models – Experian draw its forecasts from the NIGEM model, Oxford have their own macro model. There may also be different population assumptions which could result in the difference in numbers around health and social care.

2.8 Neither is necessarily more accurate than the other, but simply different assumptions will have been applied. As highlighted, this does not impact on B use classes, but is handled elsewhere in the Local Plan through population led projection for care demand, so does not specifically impact upon the allocations through the Employment Land Review, but is worth noting given the variance in figures.

2.9 The other fundamental difference is around more recent Experian forecasts (i.e. December 2016 vs May 2015) showing a higher growth generally in accommodation and food, and professional services which may reflect recent growth in the historical figures for these sectors that are used to project the future projections. From looking at historical data, indeed the last few years have seen faster growth within the accommodation and food, care and certain parts of the professional/private services sectors that would be reflected forward in more recent forecasts being made.

2.10 It is the cumulative effect of these differences, but mainly the difference in assumptions around health and social care, which result in the overall jobs growth figures.

2.11 There are other variances between the models, again likely to be factored largely around national assumptions, such as the Oxford model projecting a sharper decline in manufacturing but faster growth in IT. These have a negligible impact on employment land allocation though, as both project no additional land is required for a growth in manufacturing, and office requirements are agnostic to which specific sector, whether IT or professional services or finance, growth occurs.

2.12 In summary, for the figures that impact land allocation through the Employment Land Review, for both 'primarily' B1A and B2/B8 related sector jobs growth, it can be seen that the REM figures are slightly lower than the Oxford Economics forecast, therefore there is sufficient headroom in the original projections to be able to meet both sets of projections.

Scenario Two: Re-profiled Sector Growth

2.13 The re-profiled sector growth scenario 'Scenario 2' uses the baseline figures as its basis, and simply multiplies the sector projections by particular factors. Therefore, because the same assumptions would be applied to both Oxford Economics and REM, the comparative figures for scenario two for each forecast would be completely in proportion to the comparison above. So for the purposes of sensitivity testing, this reaches exactly the same conclusions: that the land supplied through the original forecasts remains sufficient to meet the requirements of jobs growth in all scenarios.

Confirming Jobs Growth Projections Used in Determining Land Supply

2.14 Therefore, in conclusion, the original job projections that are used to determine land supply remain those in the original ELR (2016):

Table 2: Job growth forecasts (headcount)

Sector	2012-14 BRES change	OE baseline forecast 2014-31	OE scenario 2 forecast 2014-31	Baseline 2012-31	Scenario 2 2012-31
Agriculture, forestry & fishing	0	-135	-135	-135	-135
Mining and quarrying	0	0	0	0	0
Manufacturing	-100	-1,131	-1,131	-1,231	-1,231
Electricity, gas, steam and air	-100	18	18	-82	-82
Water supply	-50	-39	-39	-89	-89
Construction	150	1,179	1,203	1,329	1,353
Wholesale & retail trade	1,000	1,575	1,412	2,575	2,412
Transportation & storage	-350	1,015	1,037	665	687
Accommodation & Food	900	1,052	947	1,952	1,847
Information & Communication	600	466	569	1,066	1,169
Financial and insurance	-500	43	52	-457	-448
Real estate	550	375	384	925	934
Professional, scientific & tech	-350	2,747	3,295	2,397	2,945
Admin & Support	200	1,704	1,733	1,904	1,933
Public Admin & Defence	200	-787	-787	-587	-587
Education	-50	-100	-100	-150	-150
Health & Social Work	0	1,212	1,212	1,212	1,212
Arts, Entertainment & Recreation	-350	815	822	465	472
Other service activities	200	550	557	750	757
Total	**1,950**	**10,560**	**11,050**	**12,510**	**13,000**

Source: Oxford Economics / ONS

3.0 Assessing the Need and Demand for Employment Land

3.1 This section updates the net demand figures with the latest information from monitoring data. The plan period has also been adjusted to 2012 – 2033. The forecast demand from forecast job growth in the table below now includes an extra two years on to the original totals to reflect this.

Reflecting the new Local Plan period of an additional 2 years

3.2 Firstly the ELR demand projections need to reflect that the plan period has been adjusted to 2012 – 2033. The forecast demand from forecast job growth now includes an extra two years on to the original totals to reflect this in the table below.

Table 3: Floorspace demand from forecast job growth 2012-2033 (including an extra two years

Use Class	Baseline 2012-33				Scenario 2 2012-33			
	Floorspace (m2)	With 5% vacancy	Land (Ha)	With 5% vacancy	Floorspace (m2)	With 5% vacancy	Land (Ha)	With 5% vacancy
B1a	49,240.60	51,703.20	8.20	8.60	57,348.80	60,215.80	9.60	10.00
B1b	6,575.20	6,903.40	1.70	1.80	8,334.80	8,751.40	2.10	2.20
B1c	5,739.60	6,027.00	1.50	1.60	6,156.40	6,464.60	1.60	1.70
B2	-21,038.60	-22,090.80	-5.40	-5.60	-20,719.20	-21,754.80	-5.10	-5.50
B8	62,821.00	65,962.20	12.60	13.20	62,291.60	65,406.20	12.50	13.10
D2	17,591.40	18,471.20	4.40	4.60	17,889.80	18,784.00	4.40	4.60
Total	**139,964.20**	**146,963.20**	**28.20**	**29.20**	**150,048.20**	**157,550.20**	**29.60**	**31.40**

Analysis of Change of Supply 2012 - 2017

3.3 Secondly, Table 4 overleaf shows the change of supply by use class between 2012 and 2017, reflecting the changes to the employment land supply based on planning consents and completions. This net change needs to be accounted for to ensure an accurate future for the supply of employment land. The same assumptions in the original ELR apply to the figures in Table 4. Please see the ELR (2016) for more information.

Table 4: Change in Supply by Use Class over the Threshold (400sqm) 2012-2017

Use Class	Gained	Lost	Net	
	Floorspace (m2)	Floorspace (m2)	Floorspace (m2)	Land (Ha)
B1a	22,340	-56,896	-34,556	-1.73
B1b	868	0	868	0.09
B1c	1,654	-3,670	-2,016	0.23
B2	5,159	-9,803	-4,644	-0.11
B8	3,996	-7,625	-3,629	0.25
Sub total for B uses	**34,017**	**-77,992**	**-43,975**	**-1**
D2	4478.53	-1272	3206.53	1.88
Total	**72,513**	**-157,257**	**-84,744**	**-1**

Change of Supply Outcomes

3.4 Applying the supply over the period 2012-2017 provides for the unmet requirements that need to be provided for over the remainder of the local plan period to 2033, as shown in Table 5 below:

Table 5: Scenario 2 – Remaining unmet demand 2012-2033 (including 5% vacancy) factoring in change of supply 2012-2017

Use Class	NET Floorspace Completions (2012-2017)		Scenario 2 - 2012-33			
	Floorspace (m2)	Land (Ha)	ORIGINAL REQUIREMENT (inc. 5% vacancy) (from Table 3)		REVISED REQUIREMENT for 2017-2033(inc. 5% vacancy + 2012-2017 completions)	
			Floorspace (m2)	Land (Ha)	Floorspace (m2)	Land (Ha)
B1a	-34,556	-1.73	60,215.80	10	94,771.32	11.7
B1b	868	0.09	8,751.40	2.2	7,883.40	2.1
B1c	-2,016	0.23	6,464.60	1.7	8,480.60	1.5
B2	0	0.00	0.00	0	0.00	0.0
B8	-3,629	0.25	65,406.20	13.1	69,034.70	12.9
B uses sub-total	**-44,570**	**-1**	**140,838**	**27**	**180,170**	**28.2**
D2	3,207	1.9	18,784.00	4.6	15,577	2.7
Total	**-85,934**	**-1.1**	**157,550.20**	**31.4**	**195,747**	**30.9**

Land Supply Requirements

3.5 As set out in the ELR (2016) an additional 2 year land supply to allow for time for developments to be complete should be factored into allocations. Factoring in this in the B use land supply increases the requirement by approximately 7 hectares to

38ha. As see in Table 6 below, there has been a significant increase in the amount of B1a floorspace required. This can be explained by the updated monitoring information in relation to change in supply, as shown in Table 4. This indicates a loss of approximately 34,500 sqm of B1a office space. Records indicate that these losses relate to recent loss of floorspace through ORCs (see following section) and the loss of 24,000 sq.m. B1a office space at George Hudson Street (application reference 14/01383/FULM) which has been developed for student housing.

Table 6: Scenario 2 Employment Land Requirements 2017-2038 (including 5% vacancy), Factoring in Change of Supply 2012-2017 and Including 2 Years Extra Supply

Use Class	Scenario 2 2017-33		Scenario 2 2033-38		Scenario 2 Total 2017-2038	
	Floorspace (m2)	Land (Ha)	Floorspace (m2)	Land (Ha)	Floorspace (m2)	Land (Ha)
B1a	94,771.32	11.7	12,310	2.1	107,081	13.8
B1b	7,883.40	2.1	1,644	0.4	9,527	2.5
B1c	8,480.60	1.5	1,435	0.4	9,916	1.9
B2	0.00	0.0	0	0	0	0.0
B8	69,034.70	12.9	15,705	3.2	84,740	16.1
B uses sub-total	**180,170**	**28.2**	**31,094**	**6**	**211,264**	**34.3**
D2	15,577	2.7	4,398	1.1	19,975	4
Total	**195,747**	**30.9**	**35,492**	**7.1**	**231,239**	**38.1**

Flexibility requirements

3.6 Flexibility requirements were discussed in the original ELR. A number of comments were received through the consultation that further work was needed on assessing flexibility requirements. Make it York stated that it will be important in confirming the employment allocations that the Council has ensured not only sufficient overall quantum but that there is sufficient range and flexibility to deliver land requirements throughout the whole plan period. Following what Make it York call 'significant losses' of office accommodation under permitted development (PD) rights, it has been suggested that there is a severe shortage of high quality Grade A office stock within the city centre and old stock being removed from the market that is not currently being replaced.

3.7 By way of background, in 2013, temporary permitted development rights were introduced to enable offices to be converted to housing without having to apply for planning permission. The Government has now decided to extend this measure and make it permanent. Permitted development rights are subject to prior approval of a limited range of matters (flooding, highways and transport for example), but allow developers to convert offices to residential without conventional planning permission. Since their introduction in2013, there has been considerable use of the 'office-to-resi' PD rights.

3.8 For York, based on completions only, there has been some 19,750sqm of office space lost for residential conversion over the there monitoring years between 2014/15 and 2016/17. The biggest loss of office space has been in the city centre with some 7,840sqm of floorspace, followed by sub-urban locations which have seen approximately 6,680sqm of lost office floorspace. Records show that unimplemented ORC consents contain the potential loss of some 27,300sqm of office floorspace.

3.9 Whilst monitoring data on ORCs indicates some significant losses of office floorspace, it is important to note that this information is already picked up through monitoring data and therefore already factored in to our assessment of need and demand for employment land. Furthermore, as PD changes are only relatively new information is only available for the last three years. This is not considered sufficiently robust to consider added an annual uplift into our employment land requirements for losses of office floorspace to ORCs. There is also much uncertainty as to whether the level of losses experienced will continue given that changes to PD rights were originally temporary which may have meant an initial rush in applications and implementation of consents. It may be that now ORCs have become permanent there will be a slow down in applications.

3.10 In order to increase the attractiveness of the city to potential inward investors, the importance of ensuring that the supply of employment land will be flexible enough to cope with changes in the employment land market is recognised. In the same way, it is important to recognise the possibility of sites not coming forward, to understand the phasing of sites during development and also to offer prospective businesses a range and choice of locations and sizes of buildings. However estimating churn and its relationship to employment driven demand is not straightforward. As such, our approach to deal with choice and churn remains to deal with it through supply not demand. This will enable sufficient flexibility to allow future business needs to be met as individual businesses can have extremely varied criteria for site selection; in relation to the cost, character of site/premises, and transport links. It is also necessary to consider whether the available land is of the right type and in the right location to meet future market demand.

4.0 Land Supply

4.1 Between 18 July and 12 September 2016 a preferred sites consultation was undertaken as part of preparing the new Local Plan. Views were sought on housing and employment requirements as well as potential site allocations to meet the demand. A number of responses were received as part of this consultation in relation to the proposed employment sites.

4.2 The York and North Yorkshire Chambers of Commerce have suggested that on the basis of sites identified in the Preferred Sites Consultation (2016) it is unlikely that the future supply will offer a sufficient range of choices of location for potential occupiers and that there will be a risk that York would lose out on investment for potential occupiers. The Chamber feels that further land should be identified to broaden the portfolio of sites available to cater for York's diverse high value added business. Make it York suggested that allocating land flexibly amongst use classes will help mitigate risk of undersupply and is strongly welcomed. Given forecasting is not an exact science, Make York state that it will be very important to monitor and respond to the change of supply over the whole plan period. Allowing flexibility to

adapt and change use classes within site allocations will be critically important in ensuring the risk of undersupply is mitigated. The York Central Partnership noted that the ELR (2016) allows for 'churn' through the provision of an additional 2 years worth of employment land. However, the fact that the Preferred Sites document (2016) proposed to meet all B1a office need through a single allocation at York Central, may be perceived to undermine the objectives of building in churn. Whilst development will be phased at York Central allowing multiple developers, outlets and phased schemes the partnership suggest that it may be appropriate for the Local Plan to allow small scale B1a uses to be accommodated on additional sites in the district.

4.3 Further work has been undertaken to refine and reconsider previous sites assessments as well as emerging evidence base to consider the sites which best meet the employment need of the city or whether they are best suited for alternative uses. In addition, further work has been undertaken regarding transport and viability. A summary of all sites considered for employment uses and the outcome of the technical economic assessment is set out in Table 7 overleaf. The full scoring against the economic criteria is set out in Annex A. It should be noted that the economic assessment was only one element of the site selection process and a number of other factors were also taken into account. The key principles of the site selection methodology are as follows:

- The protection of the city's unique heritage.
- The Protection of environmental assets.
- Appropriate management of flood risk.
- Achieving accessibility to sustainable modes of transport and a range of services.

4.4 Please see Section 6.0 of the ELR (2016) for a full explanation of the stages undertaken to identify sites and economic appraisal undertaken to assess the suitability of the sites for employment uses.

Table 7: Outcomes of Economic Assessment

Local Plan Ref (2014)	Site Ref	Site Name	Economic Score B1 (Score out of 58)	Economic Score B2/B8 (Score out of 44)
Previously Assessed Sites				
ST5	293	York Central	44	22
ST27	794	University of York Heslington East Campus and Expansion	40	24
E15	828	Land at Hull Road	38	23
E17 (ST19)	847	Northminster Business Park	35	24
E12	684	York Business Park	32	22
ST26	97	South of Elvington Airfield Business Park	29	19
ST25	800	Land South of Designer Outlet	28	21
E16	742	Poppleton Garden Centre	27	20
E4	64	Land at Layerthorpe and James St	26	14
E5	307	Land at Layerthorpe and James St	26	14
E9	602	Elvington Industrial Estate	25	17
ST18	724	Monks Cross North	25	17
SF13 (ST6)	181	Land East of Grimston Bar	24	16
E10	706	Chessingham Park, Dunnington	24	16
E2	635	Land north of Monks Cross Drive	21	15
E7	599	Wheldrake Industrial Estate	21	15
E8	600	Wheldrake Industrial Estate	19	14
E11	639	Annamine Nurseries	17	13
New sites/reassessed sites following additional information submitted through consultation				
SF8		Land adjoining ST19	35	24
	246	Whitehall Grange (Autohorn)	31	20

Local Plan Ref (2014)	Site Ref	Site Name	Economic Score B1 (Score out of 58)	Economic Score B2/B8 (Score out of 44)
	873	Designer Outlet (employment)	28	21
	864	Land North of Elvington Industrial Estate	27	18
SF6		Extension to ST26	25	17
	81	Bull Commercial Centre	25	17
	892	Field No 2439 - Grange Farm Towthorpe York	24	14
	865	Four Alls Public House	24	14
	160	Sites at The Poplars Driffield Road, Murton	22	18
	161	West of Bore Tree Baulk Murton	21	15
	894	Field No 354 Crossmoor Lane Haxby	14	9

5.0 Policy Approach

5.1 A revised policy approach for Policy EC1: Provision of Employment Land, including sites, will be presented here following the decision made by Members at Executive on 13th July 2017.

6.0 Conclusion

6.1 Conclusions will be presented here following the decision made by Members at Executive on 13th July 2017.

Annex A: Economic Assessment of Potential Employment Sites

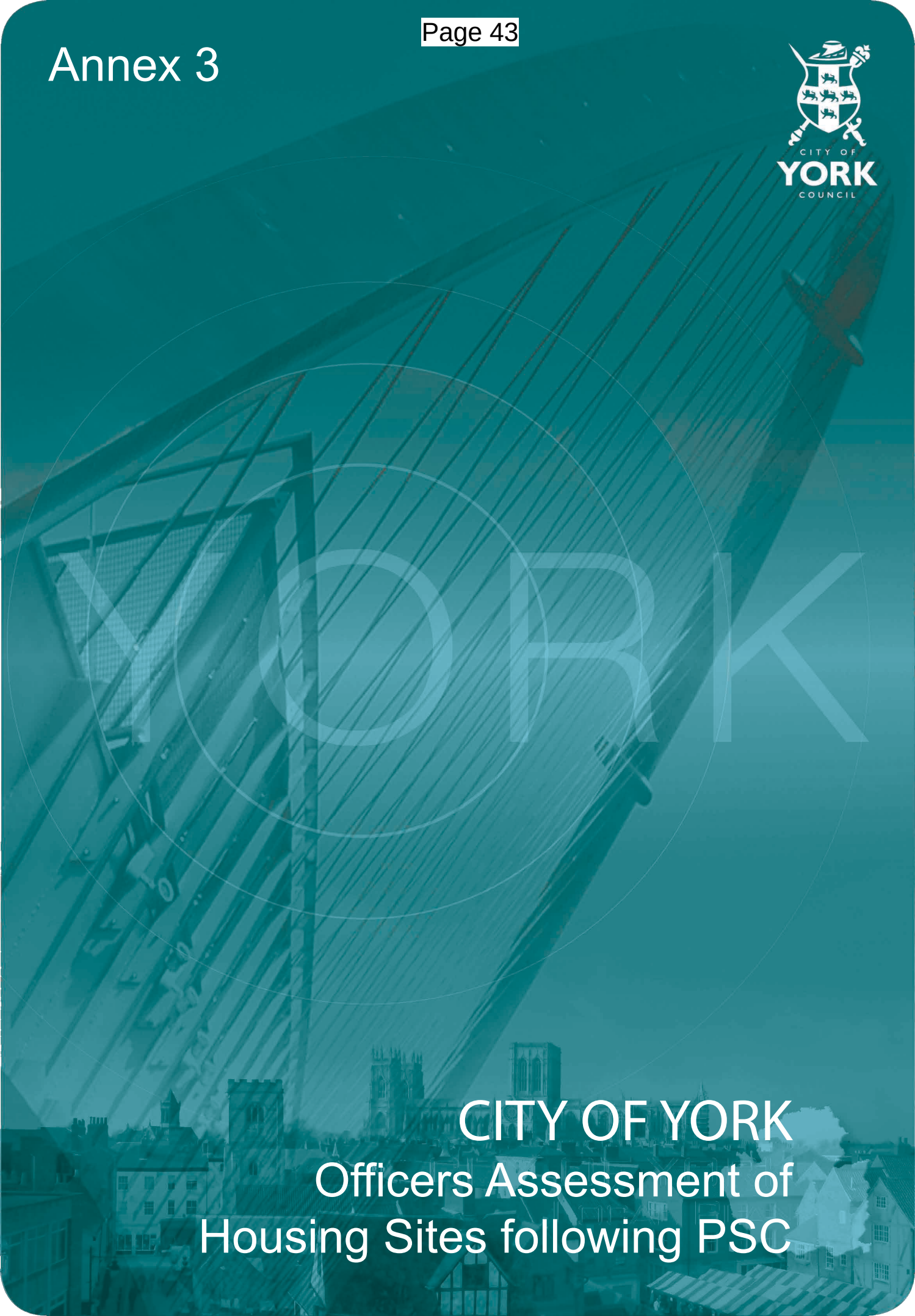
The results presented below are based on the scoring mechanism detailed in Figure 12 of the full ELR (2016).

LPPd Ref (2014)	Site Ref	Site Name	Criterion 1: Travel time to motorway	Criterion 2: Travel time to York railway station (& city centre)	Criterion 3: Agglomeration	Criterion 4: Size of site	Criterion 5: Assessment of current demand	Criterion 6: Proximity to research & knowledge assets	Score for B1 (out of 58)	Score for B8 (out of 44)
Previously Assessed Sites										
ST5	293	York Central	1	5	4	5	3	2	44	22
ST27	794	University Expansion	2	2	4	5	3	4	40	24
E15	828	Land at Hull Road	2	2	5	2	4	4	38	23
E17 (ST19)	904	Northminster	3	2	5	3	4	1	35	24
E12	684	York Business Park	3	3	4	2	3	1	32	22
ST26	97	South of Airfield Business Park	2	1	4	3	3	2	29	19
ST25	800	Land South of Designer Outlet	3	1	2	4	3	2	28	21
E16	742	Poppleton Garden Centre	3	2	4	2	2	1	27	20
E4	64	Land at Layerthorpe and James St	1	3	3	1	2	2	26	14
E5	307	Land at Layerthorpe and James Street	1	3	3	1	2	2	26	14
E9	602	Elvington Industrial Estate	2	1	4	1	3	2	25	17

LPPd Ref (2014)	Site Ref	Site Name	Criterion 1: Travel time to motorway	Criterion 2: Travel time to York railway station (& city centre)	Criterion 3: Agglomeration	Criterion 4: Size of site	Criterion 5: Assessment of current demand	Criterion 6: Proximity to research & knowledge assets	Score for B1 (out of 58)	Score for B8 (out of 44)
ST18	724	Monks Cross North	2	1	3	4	1	2	25	17
SF13 (ST6)	847	Land East of Grimston Bar	2	2	1	2	1	4	24	16
E10	706	Chessingham Park remaining land	2	2	4	1	1	2	24	16
E2	635	Land north of Monks Cross Drive	2	1	3	2	1	2	21	15
E7	599	Wheldrake Industrial Estate	2	1	3	2	1	2	21	15
E8	600	Wheldrake Industrial Estate	2	1	3	1	1	2	19	14
E11	639	Annamine Nurseries	2	1	2	1	1	2	17	13
Previously Assessed Sites										
SF8		Land adjoining ST19	3	2	5	3	4	1	35	24
	246	246 Whitehall Grange (Autohorn)	2	1	3	3	5	2	31	20
	873	Designer Outlet (employment)	3	1	2	4	3	2	28	21
	864	Land North of Elvington Industrial Estate	2	1	4	2	3	2	27	18
		Extension to ST26	2	1	4	1	3	2	25	17

LPPd Ref (2014)	Site Ref	Site Name	Criterion 1: Travel time to motorway	Criterion 2: Travel time to York railway station (& city centre)	Criterion 3: Agglomeration	Criterion 4: Size of site	Criterion 5: Assessment of current demand	Criterion 6: Proximity to research & knowledge assets	Score for B1 (out of 58)	Score for B8 (out of 44)
	81	Bull Commercial Centre	2	1	3	2	3	2	25	17
	892	Field No2439 – Grange Farm, Towthorpe	1	1	2	3	1	4	24	14
	865	Four Alls Public House	1	1	3	1	2	4	24	14
	160	Sites at The Poplars Driffield Road, Murton	3	1	1	2	2	3	22	18
	161	West of Bore Tree Baulk Murton	2	1	2	2	1	3	21	15
	894	Field No354 Crossmoor Lane, Haxby	1	1	1	2	1	1	14	9

Annex 3



CITY OF YORK
Officers Assessment of Housing Sites following PSC

Annex 3: Officers Assessment of Housing Sites following PSC

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Table 1 - Officer assessment of technical evidence - MOD Sites Assessment

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont	Queen Elizabeth Barracks, Strensall	**New site** Smaller area of the wider Queen Elizabeth Barracks site were submitted through the Preferred Sites Consultation by the Defence Infrastructure Organisaiton DIO) but these were subsequently superseded by the announcement that the entire site would be vacated for military use by 2021 and were proposed as residential sites. The complete site was submitted in November 2016 by MOD following the announcement on 7th November 2016. The newly proposed boundaries cover circa 30ha with net developable area of approximately 18ha, approximatley12ha of public open space and an estimated yield of circa 620 dwellings. The Defence Infrastructure Organisation (DIO) has confirmed that the site will be disposed of by 2021 and had carried out technical analysis of the site to inform the site capacity and its deliverability within the plan period (to 2032). Development is anticipated to commence in 2023. The site passes criteria 1 to 4 of the site selection methodology and has been considered by technical officers. No showstoppers to development have been raised at this stage although it is necessary to complete a Habitat Regulations Assessment (HRA) given the sites close proximity to Strensall Common Special Area of Conservation (SAC). This will need to confirm that the proposed development either alone or in combination with other sites in the emerging Plan would not result in an adverse effect on the SAC. The HRA screening is being undertaken to accompany the next stage of consultation for the Local Plan. The site would have a bespoke policy within the Local Plan guiding the principle of its development and covering some of issues raised below. <u>Heritage/Archaeology</u> There are no listed buildings or conservation areas currently designated within this site. However, as

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Queen Elizabeth Barracks, Strensall Continued....	access to the area has always been restricted, no detailed assessment of the existing buildings has been carried out to determine if the buildings merit designation. Historic England recommend that use is made of their pre-application assessment service so that the issue of designation can be addressed. With a site of this size it is important to consider the impact it will have on the historic nature of the city. The area needs to have a distinct identity from Strensall village and not be just a continuation of the existing development there. This was an important military site which played a wider role in its linkages to other military sites in the area and in the history of York's development as a garrison town. It is important that the area shouldn't lose the story of its identity as a military site and that careful consideration should be given to the kind of area/place being created. It will be necessary to identify the presence and assess the significances of archaeological deposits on the site. An archaeological evaluation consisting of geophysical survey and excavation of trenches will be required. This will be used to assess the significances of archaeological features and deposits and will allow decisions about the scale and form of future mitigation measures on the site. There is a reasonable potential for survival of prehistoric and Romano-British features and deposits as well as medieval and later exploitation and occupation of the site. There is a high potential for discovering water logged deposits which would be of high significance and may need to be preserved in situ – this needs to be taken into consideration through the hydrology plan/study. <u>Landscape</u> A Landscape Technical Note has been produced which gives initial analysis. Although this site is associated with Strensall by way of its proximity to the southern extent of the village, it is far removed from the village centre, and is of a very different character. The site should have its own identity and character that reflects the quality of the spacious site, its environmental context, and the natural site assets. The site is currently located within the draft greenbelt; although the parcel of land proposed for allocation contains a high number of buildings, these are located in a spacious and treed setting. The proposed residential areas would result in a much greater density of buildings; however the proposed blocks are excluded from the existing main areas of open space and tree cover.

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Queen Elizabeth Barracks, Strensall Continued....	The context of the barracks is essentially rural, therefore the presentation of the site to Strensall Road and Strensall common is sensitive and this characteristic should be retained or enhanced. There are a high number of very good quality trees on the site. The contribution they make is noted in the Landscape Technical Note and the Tree survey. The tree survey includes recommended root protection areas (RPA) for the trees and a Constraints plan, which is the baseline information required to inform any subsequent development proposals. There are no landscape 'show stoppers', with the caveat that at least all trees of category A and B, and any with a significant ecological value, or of value to the setting of listed buildings, should be retained unless they pose an unreasonable restriction on development and their contribution to the public amenity and amenity of the development is very limited, and their loss is outweighed by the benefits and mitigation provided by the development. <u>Ecology</u> A Habitat Regulation Assessment is being completed for the site to confirm if there is the poetential for impact on Strensall common as well as a people management strategy and well planned openspace within the development. The development is anticipated to result in likely significant effects (to be confirmed through the HRA screening) and therefore the HRA will need to be completed to Appropriate Assessment level. Strensall Common SAC and SSSI are part of a wider landscape and it is important not to physically separate them from this development. Although the common is already under intense recreational pressure, there are listed birds amongst other wildlife and habitats which could be harmed by the intensification of disturbance, the reduction and mitigation of such impacts needs to be given careful consideration without hard physical separation. Strensall Common has biodiversity value above its listed features in the SSSI/SAC designations that will need to be fully considered e.g. ground nesting birds. Potential access points into the planned development also need to consider impacts on Strensall Common. Within the existing barracks themselves are potential areas of UK Priority habitat areas that the

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Queen Elizabeth Barracks, Strensall Continued....	Phase 1 Habitat survey recommends further work is needed before they can be ruled in or out which will require botanical surveys being carried out. The agricultural area to the west of Towthorpe Lines is owned by the MOD and currently tenanted by a farmer but could be released and used as public open space as part of the common. However this would create a physical separation between the farm holding that works on the common and the wider site which would create issues for land management which is essential to the conservation of the site. <u>Flooding/drainage</u> The majority of the site is in flood zone 1 except for a small area to the north in flood zone 2. Given the scale of the site, a full Flood Risk Assessment will be needed and further work needs to be done regarding drainage of the site. Infiltration Sustainable Urban Drainage Systems (SUDS) would be compromised in this location but there is an opportunity to develop comprehensive SuDS for the potential new development. Good Surface Water SuDS can enhance development sites and increase the potential value of homes and the introduction of a lake could work to the advantage of the development site and Strensall Common. The adoption and maintenance of any SUDS features needs to be considered as the council has no capacity to adopt these without funding. Any hydrology plan/study also needs to consider impacts on water logged archaeological deposits and potential impact on the wet nature of the SSSI on Strensall common. <u>Transport/Highways</u> The site passes the minimum site selection criteria for access to services. The nearest existing facilities are in Strensall, it is noted that a new Primary school and a small area of mixed use development including retail and community will need to be included within the site. Further viability testing will need to be carried out early in the programme to confirm the viability (and hence deliverability) of this mixed-use development. Good bus network links already exist to York City Centre and Strensall Village along Strensall road. It

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Queen Elizabeth Barracks, Strensall Continued....	will be necessary to examine the potential for bus services entering the QEB site in order than public transport access is in line with best practise and policy requirements. The potential for new bus services being required needs to be considered as the diversion of existing services along Strensall Road is unlikely to be supported. New and upgraded bus stops are anticipated together with financial support to incentivise bus usage by first occupants and again the viability of additional services would need to be assessed. There are currently very limited cycle links to Strensall to/from the outer ring road. There is potential that contributions from this site could help to enhance the current access links including the construction of a segregated subway to facilitate the crossing of the A1237. Cycle paths would need to be provided along the site frontages connecting into the site and also focus upon the route into the village and local facilities. This could be a combination of segregated and on carriageway. A full transport assessment will need to be provided. Road safety at the Strensall Road / Towthorpe Moor Lane is currently an issue that needs further consideration. Furthermore the local parish council is anxious to avoid Towthorpe Moor Lane being inappropriately used by through traffic. If identified as necessary, mitigation to Strensall Road/Towthorpe Moor Lane junction, will require further consideration and agreement on scope. Potential access points into the planned development also need to consider impacts on Strensall Common. Accessing the potential development via Scott Moncrieff Road to the north would involve upgrading a road which currently crosses the SSSI and SAC and linking the Queen Elizabeth Barracks to the Towthorpe Lines site would introduce increased traffic to the edge of the designations. This would not be supported. <u>Contamination</u> Past activities (including vehicle maintenance and refuelling, firing ranges etc) could have given rise to land contamination, so an appropriate contamination assessment would need to be submitted with any planning application. The MOD advises that the site would be investigated and any threats removed prior to disposal of the site.

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Queen Elizabeth Barracks, Strensall Continued....	<u>Noise</u> The principal noise concern for the site relates to the potential for the continued use of the training areas for army purposes and the potential for adverse effect on any new housing. In particular noise associated with shooting and rifle ranges are of concern, as well as noise associated vehicle movements which may occur. Further assessment will be required. **Officers suggest that the site could be included as a potential housing allocation within the Plan for up to 623 dwellings. Further technical work is progressing on the site including the HRA screening and Appropriate Assessment. The screening assessment will be produced to accompany the next stage of consultation with further work and consultation with the appropriate statutory and specific consultees.** **A bespoke planning policy for the site will need to be included within the draft Plan guiding the principle of its development and covering the issues highlighted by technical officers.** **See map on page 15 for proposed allocation boundary.**
Proposed Allocation	Imphal Barracks, Fulford Road	**New Site** Site submitted November 2016 by MOD. Site boundary circa 30ha with net developable area of approximately 19ha, approximatley11 ha of public open space and an estimated yield of circa 769 dwellings. The Defence Infrastructure Organisation (DIO) has confirmed that the site will be disposed of by 2031 and has carried out technical analysis of the site to inform the site capacity and its deliverability within the post plan period (2032-2037). The site passes criteria 1 to 4 of the site selection methodology and has been considered by technical officers. No showstoppers to development have been raised at this stage although further detailed transport modelling is required to assess the potential impacts on the A19.

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Imphal Barracks, Fulford Road Continued....	The site would have a bespoke policy within the Local Plan guiding the principle of its development and covering some of issues raised below. <u>Heritage/Archaeology</u> This site contains two Grade II listed buildings and the Fulford Road frontage lies within the Fulford Road Conservation Area. However, as access to the area has always been restricted, no detailed assessment of the existing buildings has been carried out to determine if they merit designation. Historic England recommends that use is made of their pre-application assessment service so that the issue of designation can be addressed. Therefore further work needs to be done on understanding the existing structures and if they warrant listing. The Fulford Road Conservation Area boundary currently makes only a minimal incursion into the potential site as this was based only on assessments done from the road itself given the restricted access of the site. It is broadly accepted that this conservation area boundary is irregular in its form and requires revision. It is likely that this revision will take it further into the boundary of the Imphal Barracks site. Therefore the existing buildings need to be assessed as a group to contribute to the conservation area appraisal update and the parade ground as a design concept is also an important feature of the current site which needs to be retained in any future designs to compliment the understanding of the history of the site. This site does not exist as an army barracks in isolation and has linkages to other military sites across the city and is linked to the development of York as a garrison town and this history should be reflected in the design of any potential scheme. It will be necessary to identify the presence and assess the significances of archaeological deposits on the site. An archaeological evaluation consisting of geophysical survey and excavation of trenches will be required. This will be used to assess the significances of archaeological features and deposits and will allow decisions about the scale and form of future mitigation measures on the site. There is a reasonable potential for survival of prehistoric and Romano-British features and deposits

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Imphal Barracks, Fulford Road Continued....	as well as medieval and later exploitation and occupation of the site. There is a high potential for discovering water logged deposits which would be of high significance and may need to be preserved in situ – this needs to be taken into consideration through the hydrology plan/study. <u>Landscape</u> There are no landscape 'show stoppers', with the caveat that at least all trees of category A and B, and any with a significant ecological value, or of value to the setting of listed buildings, should be retained unless they pose an unreasonable restriction on development and their contribution to the public amenity and amenity of the development is very limited, and their loss is outweighed by the benefits and mitigation provided by the development. There are a high number of very good quality trees on the site. The contribution they make is noted in the Landscape Technical Note and the Tree survey. The tree survey includes recommended root protection areas (RPA) for the trees and a Constraints plan, which is the baseline information required to inform any subsequent development proposals. The nature of the public open space should remain natural and open. Any significant built recreational facilities should be kept within the built development zone, not the Public Open Space. The extent to which the development might impact on views would depend on the design detail and on tree and hedgerow retention. <u>Ecology</u> This site has limited biodiversity interest within it except for the potential for bats in the existing buildings for which further assessment is needed. However, the main issue to consider with this site is the proximity and relationship with Walmgate Stray. Walmgate Stray is a UK Priority Habitat for semi-improved grassland and is currently under Higher Level Stewardship management. A large area of open space will be retained on the eastern edge of Imphal Barracks, however it is inevitable that people will also want to use the Stray. The land is managed with stock which would cause conflict with people trying to access the area for recreation e.g. dog walkers. If it becomes

Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Imphal Barracks, Fulford Road Continued....	unviable to graze the land and forces a change of management the value of the grassland would potentially deteriorate. Further Hydrological work is required to assess the potential impact on the Stray and to the value of the grassland. The area and adjacent surrounds are also incredibly wet which contributes to the value of the Uk priority Habitat grassland on Walmgate stray and any changes to hydrology need to consider impact on this. <u>Flooding/Drainage</u> There is pressure on this site and the area in general at present in terms of drainage. The connectivity to the existing drainage network would need to be improved. It would be preferable to go back to base principles in terms of designing a new drainage system for the site and not use the existing historical systems that are currently in place. The site would benefit from a comprehensive modern SuDS scheme. <u>Transport/Highways</u> This site is inherently sustainable given its situation within the main built up area of York its relationship to the city centre and its proximity to shops and facilities in the Fulford Road area. There are good existing pedestrian and cycle networks linking to the city centre and frequent bus services. However given the size and depth of the site it is likely that in actual fact many areas of new housing will fall outside the recognised 400 metres walk distance to a bus stop. This issue would needs to be factored into site planning and the sustainable transport provision overall. There are existing issues with traffic congestion in this area. The base traffic situation on the A19 is that it is at or exceeding capacity in the vicinity of Heslington Lane/Broadway. Further detailed modelling is required to assess the potential implications of the site. The site is not going to be released until 2031 so will not be included until the end of the plan period.

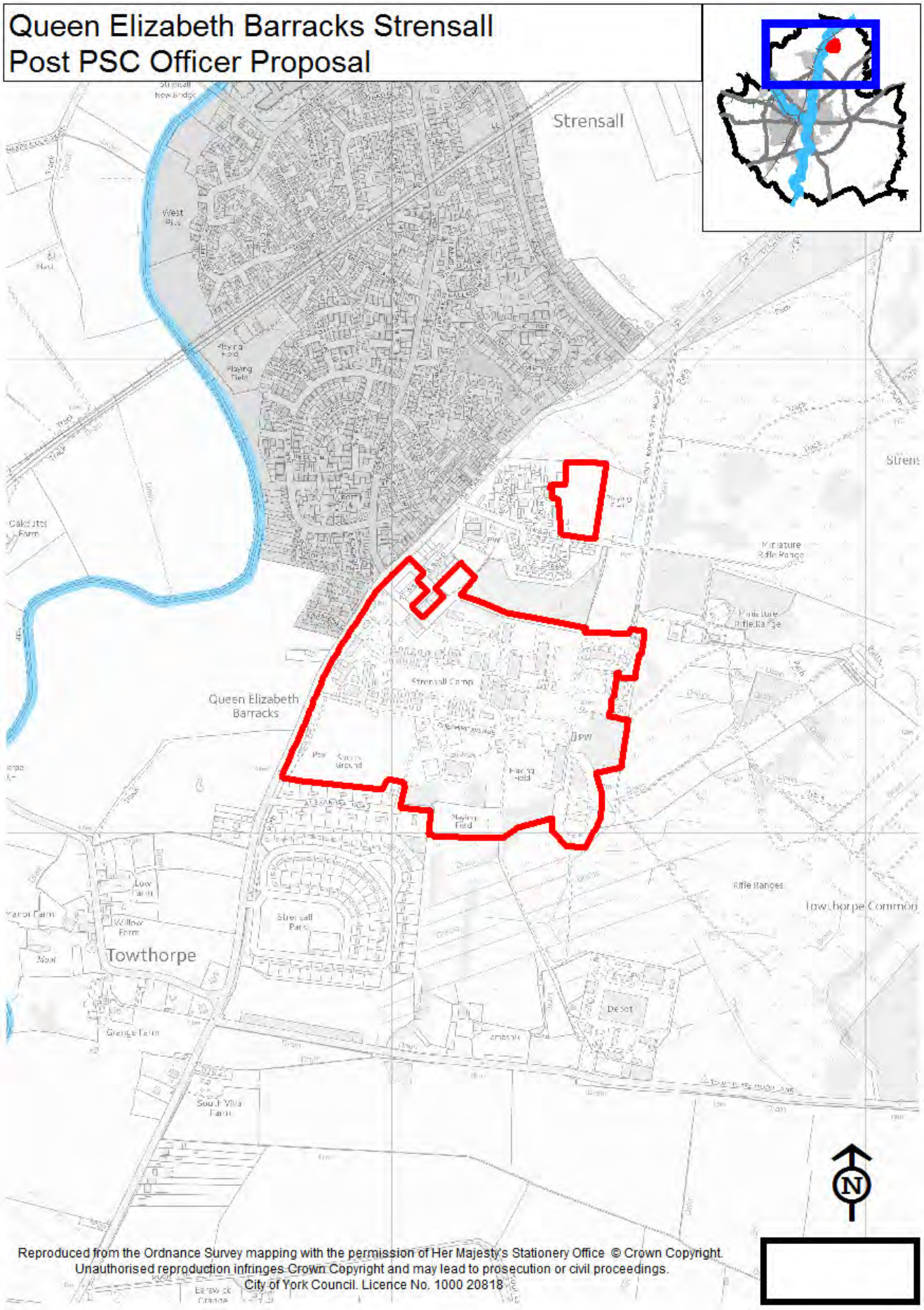
Allocation/ Site Reference	Site Name	Officer Commentary
Proposed Allocation Cont....	Imphal Barracks, Fulford Road Continued....	<u>Contamination</u> Past activities (including vehicle maintenance and refuelling, firing ranges etc) could have given rise to land contamination, so an appropriate contamination assessment would need to be submitted with any planning application. The MOD advises that the site would be investigated and any threats removed prior to disposal of the site. <u>Noise</u> The primary concern regarding Imphal Barracks redevelopment for housing relates to the potential for increased traffic affecting the amenity of existing residential properties in close proximity, in particular increase traffic associated with vehicle access points to the site. An assessment of impact will be required and should be based upon the transport assessment results in terms of predicted vehicle numbers. **Officers suggest that the site could be included as a potential housing allocation within the Plan for up to 769 dwellings. Further technical work is progressing on the site including the required transport modelling and consultation with the appropriate statutory consultees.** **A bespoke planning policy for the site will need to be included within the draft Plan guiding the principle of its development and covering the issues highlighted by technical officers. See map on page 16 for proposed allocation boundary. Also see Table 5 for land submitted under references 624/937/939/943**

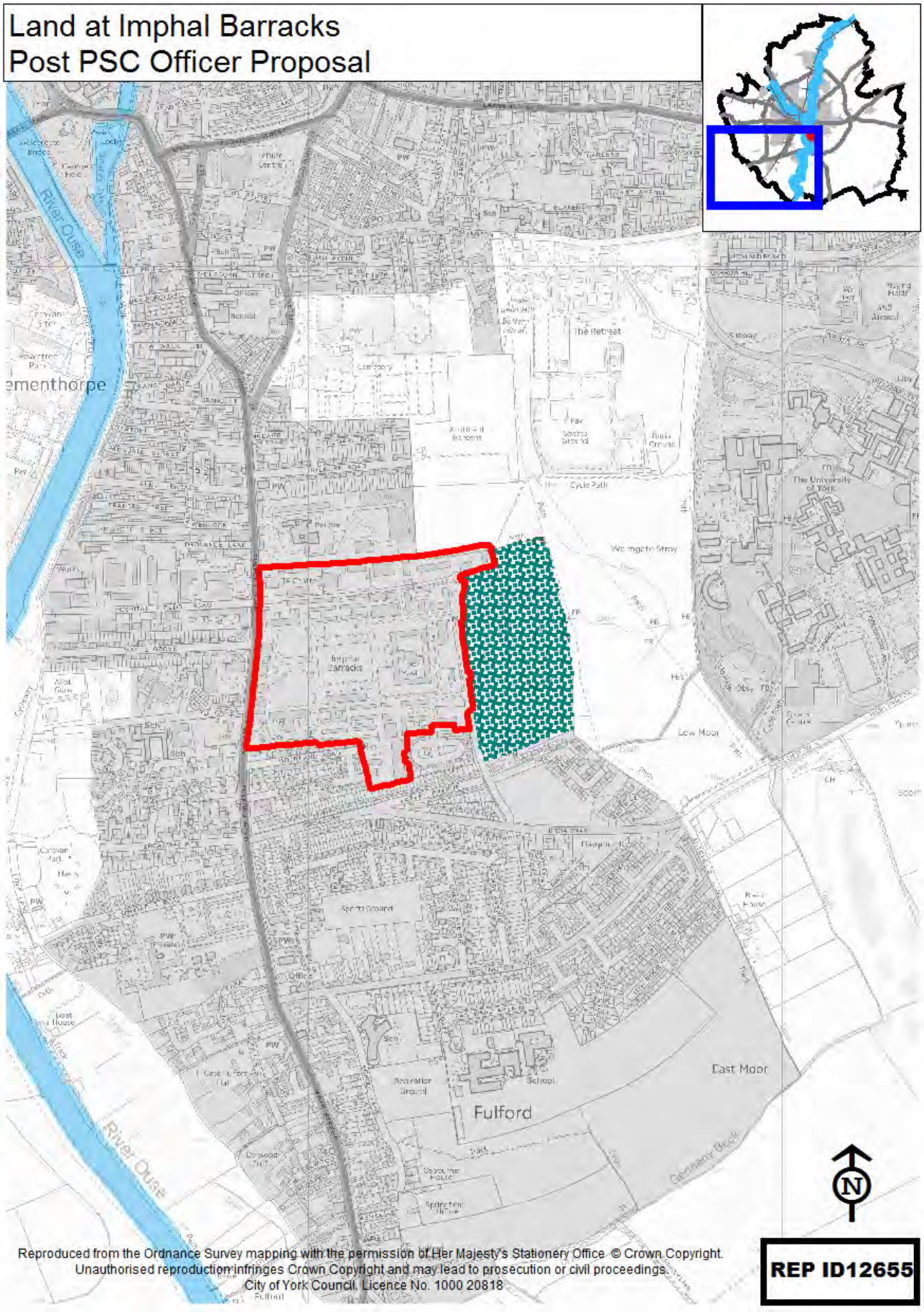
Allocation/ Site Reference	Site Name	Officer Commentary
Site 925	Towthorpe Lines	**New Site** Site submitted for circa 4.5ha and up to 80 dwellings. The site fails criteria 4 (access to services and transport) of the site selection methodology for residential sites. The site passes criteria 1 to 4 of the site selection methodology as a potential employment site. The Defence Infrastructure Organisation (DIO) has confirmed that the site will be disposed of by 2021 and has carried out technical analysis of the site to inform the site capacity and its deliverability within the plan period. The site would have a bespoke policy within the Local Plan guiding the principle of its development and covering some of issues raised below. <u>Heritage/Archaeology</u> There are no listed buildings or conservation areas currently designated within this site. It will be necessary to identify the presence and assess the significances of archaeological deposits on the site. An archaeological evaluation consisting of geophysical survey and excavation of trenches will be required. This will be used to assess the significances of archaeological features and deposits and will allow decisions about the scale and form of future mitigation measures on the site. There is a reasonable potential for survival of prehistoric and Romano-British features and deposits as well as medieval and later exploitation and occupation of the site. There is a high potential for discovering water logged deposits which would be of high significance and may need to be preserved in situ – this needs to be taken into consideration through the hydrology plan/study. <u>Landscape</u> Towthorpe Lines is not associated with Strensall village. It is experienced from Towthorpe Moor Lane which is a rural road. Development of housing on this site would be inappropriate to the character of the lane, the extent of Strensall village, and the character of the greenbelt. Although there is built development on the site, it is set back from the road, and is of an isolated, functional character - very different to residential housing, which is normally associated with a community. Commercial

Allocation/ Site Reference	Site Name	Officer Commentary
Site 925 Cont....	Towthorpe Lines Continued....	development may be appropriate given the sites current use as a depot site in conjunction with the MOD. <u>Ecology</u> As required for the Queen Elizabeth Barracks site a Habitat Regulation Assessment is being completed for the site to confirm if there is the potential for impact on Strensall common as well as a people management strategy and well planned openspace within the development. The development is anticipated to result in likely significant effects (to be confirmed through the HRA screening) and therefore the HRA will need to be completed to Appropriate Assessment level. The road necessary to link this site with Queen Elizabeth Barracks runs along the edge of the SSSI and SAC and has the potential to impact upon them. The upgrade of this road would also separate the farm holding from the wider sites creating issues for land management which is essential to the conservation of the site. This would therefore not be supported. <u>Flooding/drainage</u> The site is in Flood Zone 1. Care should be taken not to disrupt the hydrology of Strensall Common. <u>Transport/Highways</u> This site currently fails the minimum criteria for the site selection criteria 4 - Access to services and Facilities for a residential site. The site could be suitable as an employment site for B2/B8 uses subject to further detailed transport assessment. Road safety at the Strensall Road / Towthorpe Moor Lane junction is currently an issue that needs further consideration. Furthermore the local parish council is anxious to avoid Towthorpe Moor Lane being inappropriately used by through traffic. If identified as necessary, mitigation to Strensall Road/Towthorpe Moor Lane junction, will require further consideration and agreement on scope. <u>Contamination</u> Past activities (including vehicle maintenance and refuelling, firing ranges etc) could have given rise to land contamination, so an appropriate contamination assessment would need to be submitted with any planning application. The MOD advised that the site would be investigated and any threats

Allocation/ Site Reference	Site Name	Officer Commentary
Site 925 Cont...	Towthorpe Lines Continued....	removed prior to disposal of the site. <u>Noise</u> The principal noise concern for this site relates to the continued use of the training areas for army purposes and the potential for adverse effect. In particular noise associated with shooting and rifle ranges are of concern, as well as noise associated vehicle movements which may occur. **Officers suggest that the site could be included as a potential employment allocation within the Plan. Further technical work is progressing on the site including the HRA screening and Appropriate Assessment. The screening assessment will be produced to accompany the next stage of consultation with further work and consultation with the appropriate statutory and specific consultees. See map 925 on page 17 .**

Annex 3: Officers Assessment of Housing Sites following PSC




Land at Imphal Barracks
Post PSC Officer Proposal
River Ouse
The Retreat
Imphal Barracks
Low Moor
East Moor
Fulford
River Ouse
N
REP ID12655
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925 Towthorpe Lines
Miniature Rifle Range
Miniature Rifle Range
Strensall Camp
CHESHIRE AVENUE
Pav
Sports Ground
Playing Field
Playing Field
ALEXANDRA ROAD
Rifle Ranges
Towthorpe Common
Depot
Lambshill
TOWTHORPE MOOR LANE
Earswick Moor
Moor Lane (Track)
Parson's Share
Barnard's Allotment
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Table 2 - Officer assessment of technical evidence - No or minor changes suggested to PSC position

Allocation Reference	Site Name	Officer Commentary
Strategic Sites		
ST1	British Sugar and Manor School	**Total Representations: 52** **Supports: 21** **Objections: 11** **Comments: 23** Amongst others, Nether Poppleton Parish Council and Upper Poppleton Parish Council confirm general support for the principle of development of this Brownfield site as a priority over greenbelt land and other preferred sites, particularly its completion in advance of ST2. Additional comments made around the site's mix of housing, density, transport and access, biodiversity and open/play space provision. The developer/landowner confirms that it is committed to the regeneration of the former British Sugar site and is working with CYC to demonstrate the deliverability of the site; they are working with Officers towards a target determination date for the submitted planning applications towards the end of this year. Objections primarily relate to concerns around the scale of development proposed, impact on congestion (noting the A59), the potential to exacerbate flooding, and the availability of supporting amenities/services. Officers consider that the issues raised through consultation could be dealt with as part the detailed local planning policy for the site which will set out the requirements for the site masterplan including suitable access requirements, provision of public transport, provision of local facilities including education provision. **Officers suggest a minor change could be made to the overall quantum of the British Sugar portion of the site from 1140 at PSC to 1100 to reflect the latest planning application. The remaining 3.6ha on Manor School is being brought forward by CYC through the HCA Strategic Partnership and could deliver up to 100 dwellings. In total the site capacity has increased from 1140 at PSC to 1200 to reflect latest position. See map p.49**

Allocation Reference	Site Name	Officer Commentary
ST2	Civil Service Sports Ground, Boroughbridge Rd	**Total Representations: 41** **Supports: 8** **Objections: 17** **Comments: 17** Statutory consultees including Historic England support the site's planning principles set out in the PSC including the protection of land to the southern part of the site from development as this would help preserve the historic character and setting of the City. The Developer/landowner state that the site's sustainable location and lack of technical constraints make it a suitable site offering affordable housing and a mix range of sizes, types and tenures. The site has a willing landowner and is controlled by a national house builder. They confirm that housing is deliverable within the first 5 years of the plan. A significant factor for those objecting to development of this site is congestion, due to the site's close proximity to the already congested northern ring road. Other common concerns raised in objecting to the site's development include: lack of a need for housing on this site or reference to 'overdevelopment'; loss of Green Belt; insufficient services and amenities to support new development (lack of education provision/nursery space/healthcare); loss of sports facilities and open space. Officers consider that the issues raised through consultation including concerns over transport impacts and the provision of community facilities could be dealt with as part the detailed local planning policy for the site which will set out the requirements for the site masterplan including suitable access requirements, provision of public transport and the provision of local facilities including education provision. **Officers suggest a minor change could be made to the overall quantum of the site from 292 dwellings at PSC to 266 dwellings to reflect the latest planning application.**
ST4	Land adjacent	**Total Representations: 22**

Allocation Reference	Site Name	Officer Commentary
	to Hull Road	**Supports: 11** **Objections: 6** **Comments: 5** Amongst others, Heslington Parish Council and the Heslington Village Trust support the principle of housing development on the site. Both Heslington Parish Council and Heslington Village Trust alongside other respondents support family housing and affordable housing on site but state that student housing should be specifically excluded. The developer/landowners confirm that both landowners are supportive of the allocation, its access proposals and suggested development density. Site is deliverable within the first 5 years of the Plan. Objections include that the site should remain as part of green corridor into the city; that the development will compromise Jubilee Wood and the boundary hedgerows; that the traffic on Hull Road makes residential use untenable; drainage concerns and concerns over the lack of local school space. York Ornithological club states that the planning principles for the site should be amended to make sure that there is appropriate recreational open space on site and that footpaths, hedgerows etc should be routed to guide residents and their pets away from the wildlife sensitive areas of the Heslington East campus. Officers consider that the issues raised through consultation including concerns over transport impacts, the provision of public open space, the protection of Jubilee Woods and the provision of community facilities, including enhancing school provision, can be dealt as part the detailed local planning policy for the site which will set out the requirements for the site masterplan. Amendments will be made to the planning principles to include the protection of Jubilee Woods and provision of adequate open space within the site to reduce any potential impact on the adjacent wildlife habitats. **Officers suggest no change to PSC boundary (7.54ha) or quantum (211 dwellings).**
ST5	York Central	**Total Representations:103** **Supports: 16**

Allocation Reference	Site Name	Officer Commentary
ST5	York Central	**Objections: 38** **Comments: 52** A number of comments support the principle of delivering development on this large brownfield site, including from York and North Yorkshire Chamber of Commerce, Historic England, the York, North Yorkshire and East Riding LEP and Make-it York. Comments raised in support include that the site will enable the creation of a new Central Business District to replace Grade A office losses but that critical infrastructure must be developed alongside (and details made available for consultation); and to the principle of phasing brownfield sites ahead of Greenfield. Some of those writing in support of the scheme query whether the access options proposed are the most appropriate solution, particularly in relation to the loss of Holgate community garden. Although supportive of the principle of development on this brownfield site, Historic England remains unconvinced that the quantum of development proposed is deliverable in a manner that will safeguard the numerous heritage assets in its vicinity, and without harm to the historic core of York. The risk of a development strategy focused on tall buildings and its impact on the historic skyline is also raised by a number of other respondents, including Shepherd Group and Linden Homes. A number of objections query the site's assumed delivery, stating that there is considerable doubt about the viability and deliverability of the site and its lead-in time. There are concerns that the over-reliance on housing delivery from York Central could undermine the potential for the Plan to provide sufficient land to accommodate projected housing need over the Plan period. The cumulative impact of the site on the city's already congested road network is seen as a significant threat, and the lack of detail regarding sustainable transport options inadequate. There are concerns raised that the prospective route for access to the York Central site crosses the community garden, citing the loss of productive and creative gardening and loss of amenity space.

Allocation Reference	Site Name	Officer Commentary
Cont....	Continued....	They note further significant impacts including from additional traffic/pollution on local resident's health and quality of life. Several objections question the basic tenets underpinning the scheme – rather that the site should work for the public benefit, by delivering an appropriate housing mix/density and affordable quota. Further general issues raised regarding the lack of information presented to help people understand the scheme, specifically around transport access and sustainable transport options, housing mix and type, supporting services and amenities and how development could create a new place within an existing community. Since the time of the consultation undertaken in July 2016 the Partnership has been progressing further site masterplan and viability work with City of York Council agreeing to the draw down of funds from the West Yorkshire Transport fund for the site access. This work is ongoing and will be refined through further masterplanning, viability, sensitivity testing and technical assessments to create a framework that will then be used as the basis to deliver the site. The outcome of this work to date is suggesting that the site can deliver a minimum of 1500 dwellings as per the PSC 2016 position. The York Central site is subject to detailed technical work which may increase the overall capacity of the site and its delivery. **Officers consider that the site could be included as a mixed use site with a residential element of 1500 dwellings within the post plan period as per PSC (2016) with 1250 dwellings within the plan period to 2032/33. Work is continuing to progress the masterplanning of the site and this will be reflected as the Local Plan progresses towards Publication stage and reflected in future iterations of the plan. See map on page 50.**
ST8	Land North of Monks Cross	**Total Representations: 53** **Supports: 11** **Objections: 33** **Comments: 15**

Allocation Reference	Site Name	Officer Commentary
ST8 Cont...	Land North of Monks Cross Continued....	A small number of comments support the principle of development on this site. Amongst those writing in support of development, the impact of additional traffic on the A1237 and local routes is a concern. The developer/landowner confirms that the site is deliverable with a national housebuilder onboard. Objectors to housing development on this site comment on the common themes of traffic congestion (noting the impact of the proposed stadium and Vangarde developments); inadequacy of public transport; limited amenities and services. There are also objections relating to the scale of development proposed in the Huntington area, noting the existing impact of significant recent developments on traffic, drainage and future flood risk. Historic England states that, without mitigation, development would harm several elements which contribute to the special character and setting of the City, namely its rural setting and green wedges (in this case, Monk Stray). Suggested mitigation is to pull development further away from the northern ring road and Monks Cross Link Road. Alternative boundaries to the site have been submitted by landowners/developers . They support ST8 PSC boundary in principle but object to the exclusion of land to the west between the allocation and Huntington. They consider that the approach to separate an urban extension with such a large buffer is not an appropriate plan-led approach and do not consider it is justified. It would be more appropriate to reduce the buffer in order to make more efficient use of land. A further alternative boundary is also proposed, including land to the north of North Lane (8.55ha delivering circa 250 additional homes) and increasing overall and annual rates of delivery. It is considered that the re-instatement of land north of North Lane would align with existing built development to the west and the strategic site can be appropriately contained by the A1237. A landscape buffer could be incorporated between the edge of the proposed extension and the A1237. Officers consider that the issues raised through consultation including the concerns raised regarding

Allocation Reference	Site Name	Officer Commentary
		transport impacts of the site (and the cumulative impacts of recent development) can be dealt as part the detailed local planning policy for the site which will set out the requirements for the site masterplan including suitable access requirements and the provision of sustainable transport options. The retention of some hedgerows and inclusion of green corridors within the draft masterplan is positive, as is the proposed nature reserve to the east of the site. However, the Monks Cross Link road is likely to act as a barrier to the dispersal of wildlife and so the green links to this area should not be over-played. Large attenuation ponds are unlikely to be of great benefit to great crested newts. It is reasonable to assume the proposed nature reserve will be subject to recreational pressure which can be at odds with ecological aims, better provision of open space within the development would help to balance this. **Officers consider that no change should be made to the site allocation boundary or the overall quantum of development (968 dwellings) and that it remains as per PSC (2016). Additional open space and ecological mitigation could be included on land to the east of the Link Road submitted as part of the consultation response from landowners/developers. See map 849 on page 51.** **Officers accept in principle the proposal to include land to the east of the Monks Cross Link Road if the planning principles/ bespoke site policy are amended accordingly to make it clear that this additional land would remain in the greenbelt, that open space provision should still be provided to the required quantums within the allocation boundary and that Monks Cross Link Road would need to be reduced in speed through traffic calming measures and provision of pedestrian footways and safe crossing points.**
ST9	Land North of Haxby	**Total Representations: 536** **Supports: 17** **Objections: 454** **Comments: 69** A small number of supports for the site were received for development on the site, where support was recorded, in general there is reference made to the potential for development to benefit the area, through the provision of family and affordable housing, provision of additional amenities including

Allocation Reference	Site Name	Officer Commentary
ST9 Cont.....	Land North of Haxby Continued...	open space and improving supporting infrastructure (road and rail). The developer/landowner confirms that the site is deliverable and viable based on the PSC boundary although the layout of open space within the site should not be fixed through the Local Plan it should be dealt with through the detailed planning application stage. A significant level of objection was received including from Haxby Town Council, Skelton P.C, Haxby and Wigginton Neighbourhood Planning Group. Key issues raised include: • impacts on local traffic congestion particularly on Moor Lane and Usher Lane; • current congestion levels on the A1237 and in particular the Haxby/Strensall roundabout would be compounded by further development. A number of comments refer to the need to dual the outer ring road prior to any further development taking place; • Concern that existing public transport provision is unsatisfactory and could not provide for additional residents; • General support the idea of providing a station at Haxby but need further evidence regarding the viability and adequate funding; • inadequate drainage and sewerage – that the new drainage would need to be installed before any development took place, that the current sewerage system is totally inadequate in the village, that the WWTW at Strensall is at or above capacity and that currently surface water flooding regularly causes the sewers to back up in heavy rain; • Many comments point to the need for development to be self sufficient in amenities/services, including the provision of a primary and secondary school and GP provision; and the • Significant 'piecemeal' development has already taken place in Haxby which has already impacted upon the character of the area and the adequacy of the existing levels of community facilities. Whilst recognising the concerns raised by members of the public through the consultation officers consider that the planning principles for the site would ensure that the site would deliver a significant level of additional openspace and create new local amenities to take pressure of the existing facilities in Haxby and Wigginton including a new primary school. The policy would also ensure that an

Allocation Reference	Site Name	Officer Commentary
ST9 Cont.....	Land North of Haxby Continued...	appropriate drainage strategy would be required to support the development, in consultation with specific bodies including Yorkshire Water and the Internal Drainage Board (IDB) that would ensure that the development would not exacerbate any existing surface water and drainage concerns and that the required connection to the public sewerage network would need to be funded through the site in consultation with Yorkshire Water. The planning principles also make it clear that suitable access would be required to the site including the provision of junction improvements to improve safety and visibility and that the site will need to minimise vehicular trips through the enhanced provision of public transport and integration for walking and cycling routes. Further revisions to the planning principles to address the concerns raised will be considered by officers in consultation with the relevant statutory and specific consultees. **Officers suggest that no change is made to the PSC position however further consideration should be given to the planning principles/site specific policy for the site including the location/configuration of open space within the site boundary.**
ST16	Terry's Extension Sites 1 (Terry's Car Park) & 2 (Land to the rear of Terry's Factory)	**Total Representations: 10** **Supports: 5** **Objections: 5** **Comments: 4** Historic England supports the stated development principles, in particular the requirement that development have strong architectural merit, reflecting the wider Terry's site. Re Extension Site 1: given its location, development should contribute to the architectural merit of the City. Support the intention to limit the height of any new buildings to the permitted height of the single-decked car park. Re Extension Site 2: development should maintain and enhance the formal gardens adjacent to the site. Other supports welcome the use of land for housing provided that design complements and protects views of iconic Terry's factory buildings. Development should incorporate strong links with Sustrans cycle route and bus stops on Bishopthorpe Road. The developer/landowner fully supports the proposed allocations. The sites occupy a sustainable

Allocation Reference	Site Name	Officer Commentary
ST16 Cont...	Terry's Extension Sites 1 (Terry's Car Park) & 2 (Land to the rear of Terry's Factory) Continued.....	location and have access to public transport, public footpaths, cycle route, open space and roads. Some comments consider that the Terry's car park site (site 1) would be more suited to allocation for health or nursery provision for the new residents of the Terry's site, particularly given the increased pressure on nearby existing services. Other comments note that infrastructure (including parking, doctors and schools) in the Southbank area is already struggling, and likely to be further tested by further development. Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a bespoke facility (specification given) (Yorkshire Ambulance Service). Officers consider that the objections/comments regarding the sites can be dealt with through the masterplanning of the site and by amending the planning principles where appropriate to include the provision of suitable access for cyclists and pedestrians including connections to the Sustrans route. In addition provision can be made for the Yorkshire Ambulance request for a spoke facility at the Terry's site. It is considered that whilst the Car Park site would be suitable for other uses including healthcare and nursery uses that the preferable use would be for housing given the site is brownfield land and is in a sustainable location. The developer representation requests that consideration is given to removing the restriction on the height of the development on the former Car Park site as they consider that this would be a wasted opportunity and that such a limited scale of development would not deliver on the wider design objectives identified. They consider that the development of single or two storey houses at any density into his location would look out of place, therefore a development of three or four storey buildings would be appropriate. For site 2 the developer considers that the indicative site capacity of 56 dwellings identified into the site assessment is likely to underestimate the number of dwellings that could potentially be delivered. **Officers consider that the sites should remain as in PSC and that the planning principles to**

Allocation Reference	Site Name	Officer Commentary
ST16 Cont...	Terry's Extension Sites 1 (Terry's Car Park) & 2 (Land to the rear of Terry's Factory) Continued.....	**restrict the height of any future development on the Car Park site Site 1) should be retained to protect the character of the surrounding landscape and prevent significant adverse impact on the openness and setting of the city. The estimated capacity on Site 2 (Rear of Terry's factory) is 56 dwellings based on a standard urban archetype of 95% of the site area (1.18ha) at density of 50dph. It is considered that a higher density and yield may be appropriate on this site subject to detailed consideration against the planning principles but that this should be looked at through the planning application process.** The developer also requests that the council give consideration to extending the Site 1 (Terry's Car Park site) to include additional land to the South and East (site ref 928). They consider this would make a logical extension to the car park site and would be capable of accommodating additional housing development in a sustainable and accessible location without harm to other key interests.
ST31 ST31	Land at Tadcaster Rd, Copmanthorpe Land at	**Total Representations: 92** **Supports: 52** **Objections: 37** **Comments: 7** Support received for the principle of housing development on the site, including from Copmanthorpe Parish Council. It is noted that the site is also included in the emerging Copmanthorpe Neighbourhood Plan. Where support is recorded, in general there is reference to the potential need for additional infrastructure/services to mitigate potential impact. Additional considerations raised through consultation include ensuring the houses are set back from the main road, the need to consider the impact of development on semi-rural character of the village, including appropriate densities and protection of trees and hedgerows; retaining the existing public byway at Yorkfield Lane and that there should be no secondary vehicular access or pedestrian access from Learman's Way. The developer/landowner confirms that the site is viable and deliverable with an estimated yield of up to 200 dwellings. They request a slight boundary change to remove the triangle of land adjacent to the railway line which is not in their control. This would reduce the site size from 8.1 ha (PSC) to 7.53ha with provision of openspace remaining at 2.33ha.

Allocation Reference	Site Name	Officer Commentary
Cont....	Tadcaster Rd, Copmanthorpe Continued....	Historic England objects to the allocation as they consider that development of the site would further reduce the gap between York's urban area and Copmanthorpe, harming a key element of the special character and setting of the City as identified in the Heritage Topic Paper. They recommend that the site be deleted since it is not possible to mitigate against identified harm. RSPB considers that there is currently insufficient information on the potential impacts of ST31 on Askham Bog SSSI, and the required mitigation, in the Local Plan and supporting documents. A number of further issues were raised in objection to development of ST31, as follows: • Impact of additional traffic on local highway network; • Inadequate infrastructure; • Impact on natural environment, including Askham Bog, local wildlife, trees and hedgerows; • Insufficient local amenities; • Impact on flood risk, including potential for surface water flooding impacting Flaxman Croft estate; • Both the scale of development and development density proposed are too high; and • Loss of green belt/agricultural land. Natural England confirms that the combination of the location of the A64 and provision of natural greenspace adjacent to the proposal would adequately mitigate for potential recreational pressures on Askham Bog; the topography of the site reduces the risk of impacts on hydrology from development. They advise that requirement for hydrological investigation and mitigation as necessary is included as a requirement in the plan. They suggest that the Council considers requiring the delivery of the adjacent green space allocation prior to the commencement of development and further advise contact with Yorkshire Wildlife Trust regarding potential for impacts on noted SINC's and uncommon plant species in the area. Yorkshire Wildlife Trust is satisfied that development maintains existing barriers between development and the reserve (Askham Bog), and that any hydrological connection is unlikely.
ST31	Land at	**Officers consider that the site should remain as an allocation but with a minor boundary amendment to remove land not in the ownership of the developer adjacent to the railway line**

Allocation Reference	Site Name	Officer Commentary
Cont....	Tadcaster Rd, Copmanthorpe Continued....	**and to the south of Yorkfield Lane. The planning principles should be amended to make it clear that access to the site would be via Tadcaster Road and that there would not be a secondary access from Learmans Way. In addition reference to the requirement for hydrological investigation and mitigation will be added to the planning principles/policy for the site and a requirement for the delivery of the adjacent green space allocation prior to the commencement of development to ensure protection of the adjacent SSSI. It is considered that the site density of 60% net area at 35 dph is appropriate for the site's edge of village location.** **Officers consider that there could be a minor change in the PSC boundary to remove the triangle of land adjacent to the railway line and to the south of Yorkfield Lane. Reduction in site size to 7.5ha / 158 dwellings (60% @ 35dph). See map 185 on page 52**
ST32	Hungate	**Total Representations: 5** **Supports: 1** **Objections: 2** **Comments: 2** Hungate (York) Regeneration Limited supports provisions for the Hungate site as set out in ST32. Site capacity should reflect the 720 granted by 15/01709/OUTM and further residential capacity on the remainder of the site. Allocation boundary should remove the Hiscox building. Objections and comments on the site were around the additional demand on existing education/medical facilities and the impact on flood risk. **Officers consider that the site should remain as a strategic site in the Local Plan. Of the original consent for 720 dwellings there are a remaining 550 dwellings (at 1st April 2017) which have planning permission and are included as an unimplemented consent. It is considered that a further 328 dwellings could be provided through the remaining phases of the site bringing to overall site capacity to 1041 dwellings. See Map 929 on Page 53.**
ST33	Station Yard, Wheldrake	**Total Representations: 39** **Supports: 8**

Allocation Reference	Site Name	Officer Commentary
		Objections: 31 **Comments: 1** Supports refer to the site being the best options should development land be required in Wheldrake, and that development could help support the village's services. The landowner/developer supports the draft allocation and confirms that it is appropriate, suitable and deliverable for residential development and should be allocated accordingly as set out within the Draft Plan. Wheldrake Parish Council notes that the Village Design Statement does not support the proposed development, which is located on good quality agricultural land and recognised green belt. A Planning Application for development on part of the site has previously been rejected on the grounds of noise impacts on proposed adjacent properties. Site would be more appropriately used for employment expansion. RSPB states that, in the absence of a Habitat Regulations Assessment (HRA) having been completed, this allocation is at risk of being neither legally compliant with the Conservation of Habitats and Species Regulations 2010 nor sound, as it may not be effective, justified or consistent with national planning policy. Several common themes were raised in objection to the proposed allocation, including concerns around the impact of development on local facilities/services and infrastructure capacity; the overdevelopment of the site which is considered to be incompatible with village character. Some comment that development of a smaller scale, on the brownfield part of the site, would be more suitable. There are also concerns raised around impacts on open countryside and views and impact on wildlife. Officers consider that the site is well contained and provides a natural extension to the existing village. There is a need for an assessment of Public Transport to be undertaken including the likely
ST33	Station Yard,	

Allocation Reference	Site Name	Officer Commentary
Cont....	Wheldrake Continued...	need for an uplift in bus services from the site. This requirement is within the planning principles/policy for the site allocation. There is also a need for the required financial contributions for the expansion of existing nursery, primary and secondary provision to meet the anticipated pupil yield. A HRA screening will be undertaken to support the next stage of consultation in line with the regulations. This will take account of both individual sites and potential cumulative impacts of sites on designated areas including Wheldrake Ings and the Lower Derwent Valley. Noise from the existing industrial estate could be an issue and a suitable assessment would be required to determine suitability of the site for residential use. Whilst this is not considered a show stopper for the whole of the site, there is the potential that noise from the industrial estate could make parts of the proposed allocation unsuitable for residential use. There is also the potential that if residential properties were placed next to the industrial estate then this could restrict any further expansion of the industrial estate or prevent existing businesses located on the industrial estate expanding any further. It is, therefore, essential that a noise assessment is carried out to assess the suitability of the site for residential use. It is considered that the planning principles for the site should be amended to reflect the need for a noise assessment to be carried to inform the masterplan for the site and that the developable area could be reduced subject to the results of the assessment in order to provide an adequate buffer to the existing industrial area. **Officers consider that the site should be retained as per the PSC boundary at 6ha and circa 147 dwellings. It should be noted that the final yield of the site may be reduced following the completion of a noise assessment.**
Non- Strategic Sites		
H1	Heworth Green Gas Works	**Total Representations: 8** **Supports: 3** **Objections: 2** **Comments: 3**

Allocation Reference	Site Name	Officer Commentary
H1 Cont...	Heworth Green Gas Works Continued....	Supports refer to the use of a brownfield site for housing and sustainable location. Some concerns over density and provision of suitable access. Objections are based on the potential flood risk of the site and the high density proposed. Also to exploring the use of the site for light industry rather than housing. Comments are also made regarding the loss of Green Space, congestion and inadequate access. Historic England – no objection in principle but given proximity to conservation area (No. 26 Heworth Green) and Grade II listed building on the northern side of the site proposals would need to ensure that those historic elements are not harmed. Developer supports the allocation and estimated yield of 366 dwellings. Site is deliverable partly within 5 years and part phased for longer term. Northern Gas Networks who own the gasholder and associated pipeline infrastructure (0.67ha) are not currently in a position to make land available for re-development. This should not preclude the development of the land owned by National Grid and the site could be masterplanned to protect the short-term amenity of the new residents. Previous EIA demonstrates extent of contamination which can be mitigated and is not considered a showstopper. Land owned by National Grid totals 2.87ha which is immediately available. Technical officers consider that due to the proximity of the site to existing industrial/commercial units and Layerthorpe/Hallfield Road a noise assessment would be required. Also odour may be an issue during development due to previous uses and likely contamination and remediation required. The proposed phasing of the site doesn't necessarily alter this position but this is partly dependent on whether or not the remaining Northern Gas Networks site creates any noise in the area. There is also the risk of developing housing directly adjacent to bulk gas storage facilities in terms of health and safety, and so this would need to be adequately considered. This may possibly be a showstopper and needs to be carefully investigated including relevant consultation with the Health and Safety Executive (HSE). **Officers support the retention of the site for housing as a sustainable use of brownfield land**

Allocation Reference	Site Name	Officer Commentary
		with good access to local facilities subject to further assessment and consultation with the HSE regarding the gas storage facilities on site and the impact this may have on the future development of the site. Officers suggest a minor change could be made to split site into two delivery phases to reflect land ownership and delivery timescales with no change to overall quantum (estimated yield of up to 366 dwellings).
H3	Burnholme School	**Total Representations: 5** **Supports: 2** **Objections: 2** **Comments: 1** Sport England comments received to state that as the allocation contains a playing field it should be noted that approval under the Secretary of State for Education should not be interpreted as being a justification for disposal under the planning process. This approval is in respect of education requirements only. The allocation of this site should be based on a robust evidence base that shows that the site is genuinely surplus for all sports including non-educational sporting use of the site. If this cannot be demonstrated then the playing field should be replaced in accordance with NPPF. Proposals for the site include upgrading the retained playing fields and the retained sports facilities plus investment in a MUGA at a neighbouring school. Report taken to December 2016 Executive to agree programme of delivery for the Burnholme Health and well Being Campus. Report to March Exec to appoint Ashley House and HC-One Group as developer and operator of care home (80 bed care home). Long lease of 1.13 acres (0.45ha) for care home. Residential element of the site is 1.9ha for approximately 72 homes. Proposals for the site include upgrading the retained playing fields and the retained sports facilities plus investment in a Multi Use Games Area (MUGA) at neighbouring school.
H3 Cont...	Burnholme School Continued.....	**Officers suggest a minor change to residential dwelling numbers from 81 dwellings (PSC) to approximately 72 dwellings (site size for residential remains at 1.7ha) to reflect latest Council agreed position on site. Further dialogue with Sport England will be progressed prior to**

Allocation Reference	Site Name	Officer Commentary
		Submission stage.
H5	Lowfield School	**Total Representations: 17** **Supports: 3** **Objections: 10** **Comments: 5** Supports for the site focus on the use of brownfield land for housing, provisions of housing for older persons and the potential for a self build pilot. Objections for the site include concerns over the use of the greenspace and pitches for development – should be kept to just the building footprint/brownfield element only. Concerns over adequate highways infrastructure and access, loss of green space which is important for wildlife habitats and is a local green corridor. Also concerns over the deficiency in open space in Westfield ward including pitch provision. Sport England object to this allocation. Although the grass playing fields are outside the allocation boundary allocation H5 includes a multi use games area marked out for tennis and netball. The loss of this sports facility should be assessed in accordance with para 74 of NPPF. If it cannot be evidenced that the playing field is surplus then it should be replaced. Simply replacing the multi-use games area on existing playing field would itself result in a loss of grass playing field therefore any proposed relocation has to be on land that is not existing playing field. Residential numbers were assessed at 137 however a report taken to December 2016 Executive agreed a spatial plan for 162 homes (which included plots for self build and community build), an 80 bed care home (C2 Use) and public open space of 0.77ha including informal greenspace 0.6ha and allotments 0.17ha. Report states that options for alternate site for existing pitches are being explored.
H5 Cont...	Lowfield School Continued...	**Officers suggest minor change to residential dwelling numbers from PSC from 137 dwellings to approximately 162 dwellings including plots for self build/community build to reflect latest Council agreed position on site. Further dialogue with Sport England will be progressed prior to Submission stage. Westfield ward is deficient in almost all open space typologies so future development must achieve an acceptable balance of on-site open space provision. Re-**

Allocation Reference	Site Name	Officer Commentary
		provision of the sports pitch will also need to be addressed before development commences.
H6	Land R/O The Square, Tadcaster Road	**Total Representations: 21** **Supports: 4** **Objections: 8** **Comments: 10** Supports confirm that the proposed specialised housing for the Wilberforce Trust is a more compatible neighbour to the adjacent St Leonards Hospice. Access needs to be carefully considered including access for emergency vehicles. Objections relate to sensitivity of location close to the hospice and impacts on tranquillity for residents. Concerns are raised surrounding the additional traffic and the increase in congestion, loss of existing greenspace including loss of habitats and mature trees. Representation received from the landowner/developer which confirms proposal for 30-35 residential units for visually impaired tenants plus new headquarters building for Wilberforce Trust. Object to designation as C3b specialist housing within PSC and to site boundary. Site should be extended to include 0.5ha of land to rear of St Leonard's Hospice. C3B is defined as 'not more than 6 residents living together as a single household where car is provided'. Whilst there is a level of care associated with the proposed units this is administered to tenants on an individual basis. Each apartment will be 1 or 2 bed with private bathroom, kitchen and lounge. There will be some shared facilities but the units will function as private dwellings and therefore should be classed as C3 (housing).
H6 Cont...	Land R/O The Square, Tadcaster Road Continued..	**Officers suggest that the site is retained as a specialist housing site for C3b uses. The Strategic Housing Market Assessment concludes that there is a requirement for up to 84 extra care units per annum over the plan period and that this need falls within the objectively assessed housing need. As noted on the PSC analysis the mature trees will need to be protected along with the trees on the eastern boundary which provide a suitable edge to the site and are a valuable landscape asset. The analysis also states that there are great crested**

Allocation Reference	Site Name	Officer Commentary
		newts in the locality so a further detailed ecological assessment would be required including the hedgerows which may contain bat interest.
H7	Bootham Crescent	**Total Representations: 4** **Supports: 1** **Objections: 1** **Comments: 2** Sport England object to the allocation on the basis that the site contains a playing field and that whilst relocation is taking place, the redevelopment of the community stadium included an existing playing pitch, and therefore there will be a net loss of one pitch. The allocation of the site should be based on a robust evidence base that shows the site is genuinely surplus for all sports, including ancillary facilities such as changing rooms, grandstands etc; otherwise, the Council will need to identify potential replacement provision prior to re-development. **Officers suggest no Change to PSC position. Further dialogue with Sport England will be progressed prior to Submission stage**
H8 H8 Cont...	Askham Bar Park and Ride Askham Bar Park and Ride Continued....	**Total Representations: 29** **Supports: 3** **Objections: 22** **Comments: 4** Supports relate to the use of brownfield land for housing. Number of objections received and main issues raised include increased congestion, impact on Askham Bogg, lack of local facilities including school provision and also that it should be used as a site for the creative academy rather than for housing. This includes representation from the Ebor Academy Trust who would like to build a Creative Arts Primary School on the site. Representation states that the Trust have been successful in its free school application for the national funding of a creative arts free school which will provide funding for build, set up and recompense for land. Report to March 2017 Executive on HCA Strategic Partnership includes the site as a potential for accelerated delivery. Gives quantum of up to 100 dwellings. Timescales are to work up business

Allocation Reference	Site Name	Officer Commentary
		case for exec approval in Q2/3 2017, procure builders Q3 2017, planning Q4 2017, commence building Q2 2018 and 1st completions Q1/2 2019. **Officers suggest no change to PSC and retain the site for up to 60 dwellings. This calculation of estimated yield is based on a suburban archetype of 95% net area @ 40 dph**.
H10	The Barbican	**Total Representations: 7** **Supports: 2** **Objections: 2** **Comments: 3** Supports relate to the principle of re-use of brownfield land for housing. Objections relate to the use of the site for high density housing, concerns over adequate local infrastructure and retention of the site for a city park. Historic England - No objection to principle of this application, but given its proximity to city walls (scheduled ancient monument) and central conservation area, proposals would need to ensure that those important historic elements are not harmed. **Officers suggest no change to PSC and retain the site for up to 187 dwellings. This is based on the planning approval granted 2015 for 187 apartments but it is still awaiting legal and conditions approval.**
H20	Oakhaven EPH	**Total Representations: 3** **Supports: 2** **Objections: 0** **Comments: 1** Representation received from CYC Older Persons Accommodation Programme. Care Home closed March 2016. The Executive have agreed to re-develop for extra care housing (Use class C3). The overall quantum for the site is likely to be 30 to 40 units therefore PSC site capacity should be increased. Report to March Exec seeking consent to sell to extra care developer (Ashley House

Allocation Reference	Site Name	Officer Commentary
		PLC). Scheme is for 56 extra care apartments (20 for affordable rent, 5 discount sale, 15 market rent and 16 for sale). CYC to have nomination rights on the 25 apartments for affordable rent and discount sale (25). Completion for Feb 2019. **Officers suggest that the yield of the site is increased to 56 to reflect the latest position on the site. Site will be developed for extra care housing (use class C3). The Strategic Housing Market Assessment concludes that there is a requirement for up to 84 extra care units per annum over the plan period and that this need falls within the objectively assessed housing need.**
H21	Woolnough House	**Total Representations: 3** **Supports: 1** **Objections: 0** **Comments: 2** Representation received from CYC Older Persons Accommodation Programme which states that no decision has yet been made on the future of the site and that it will only close and be available for re-development once consultation on the option to close has been undertaken and following that should Executive make a decision to close. Note that consultation is currently ongoing. Review potential of the site post consultation and prior to the Publication stage of the Local Plan. **Officers suggest that the site is removed as a housing allocation within the Plan as there is no current certainty over delivery as a housing site within plan period.**
H22	Heworth Lighthouse	**Total Representations: 2** **Supports: 1** **Objections: 0** **Comments: 1** **Site is under construction as an extension to Glen Lodge for extra care units (use class C3). Officers suggest that the PSC allocation for 15 units is retained.**
H29	Land at Moor	**Total Representations:90**

Allocation Reference	Site Name	Officer Commentary
	Lane, Copmanthorpe	**Supports:59** **Objections: 25** **Comments: 7** General supports for development of the site in principle but concerns raised over number of dwellings and proposed density. This is linked to capacity of existing infrastructure. Objections on this site relate to concerns regarding access to the site from Moor Lane particularly as it is a narrow road and would require widening which would impact on the existing grass verges. It is also considered that there would be issues regarding visibility and parking. Concerns are also raised regarding access to services and the lack of capacity of existing services including schools. Developer confirms that the site is suitable, available and achievable. Site can deliver the proposed 88 dwellings. Completions anticipated in 2019/20 @ 35 dwellings per annum. Proposed access to Moor Lane. Moor Lane to be widened to meet acceptable highway standards There is sufficient verge space without needing to encroach onto existing properties. **Officers suggest that the site should be retained with no change to the PSC position. Site is also included in the emerging Copmanthorpe Neighbourhood Plan. Site capacity is based on 95% net area at 35 dph.**
H31	Eastfield Lane, Dunnington	**Total Representations:66** **Supports:8** **Objections: 42** **Comments: 16** Supports accept the principle of housing on the site but would need to retain the existing hedgerows. Considered to be the best option for housing in the village. Objections on the site relate to concerns over a suitable access to the site, road safety and visibility

Allocation Reference	Site Name	Officer Commentary
		and the narrowness of Eastfield Lane. Concerns are raised over surface water and drainage issues in the village, the capacity of existing facilities in the village including schools, loss of greenbelt land and the loss of wildlife habitats. Developer/landowner supports the proposed site H31 in Preferred Sites Consultation and confirms that the site is suitable, available and achievable. Site can deliver the proposed 84 dwellings. Completions anticipated in 2019/20 @ 35 dwellings per annum. Officers recognise that development of the site would require improvements to be made to the Eastfield Lane/Church Balk junction and that the carriageway and footpath width along Eastfield Lane would require further detailed assessment to ensure that visibility and safety requirements are met. Highway improvements, including carriageway widening with site boundary would also be required. **Site boundary map submitted with the representation shows a minor change to the PSC site boundary to reflect the removal of an existing dwelling to the north east of the site. This would reduce the site size from 2.5ha to 2.3ha and the estimated yield accordingly from 84 dwellings to 76 dwellings (based on 95% net area at 35 dph). Officers suggest that this minor amendment to the site boundary and numbers are made to reflect landownership. See map 930 on page 54**
H39	North of Church Lane, Elvington	**Total Representations: 100** **Support: 3** **Objections: 91** **Comments: 6** Supports relate to the site being a logical extension to the village and preferable to the allocation of site at Dauby Lane (H26). The developer/landowner supports allocation in principle and confirms that site is suitable,

Allocation Reference	Site Name	Officer Commentary
H39 Cont...	North of Church Lane, Elvington Continued	deliverable and viable. Suggest that site viable to deliver 28 dwellings. Larger boundary could be accommodated without detrimental effect on Green Belt or village. Existing village boundary not defensible in long-term. Reconsider larger site 789 (West of Beckside). Objections are raised in relation to the following issues: • Impact on character of village; • Loss of greenbelt land; • Concerns over access to site and impact on local roads including Beckside and Church Lane. Roads and footpaths are narrow, rural roads and concerns for pedestrian safety and parking; • Impact on surface water and water pressure; • Lack of capacity in existing local facilities including school places; and • Loss of wildlife habitats including SINC quality hedgerows. Environment Agency – site is Located close to River Derwent and Derwent Valley SAC/SPA/Ramsar/SSSI. This is a designated site which is failing to meet its protected area objectives and WFD objectives and efforts to improve this stretch of river and associated water dependent habitats come under the Derwent Restoration Plan. One of the key issues is sediment. Should the site remain as an allocation it would be critical to ensure that sediment from the construction site does not end up in the River or local ditches. Ideally Surface Water should not be discharged into the river. Checks must be made by CYC to ensure that no cross connections on completion to ensure no contamination RSPB - In the absence of a HRA having been completed, this allocation is at risk of being neither legally compliant with the Conservation of Habitats and Species Regulations 2010 nor sound, as it may not be effective, justified or consistent with national planning policy. **Officers consider that the site should be retained as per the PSC boundary at 0.92ha and 32 dwellings. The site provides a natural extension to the existing village and is located within**

Allocation Reference	Site Name	Officer Commentary
		walking distance of local facilities. Previous analysis of the site at PSC confirmed that the Ideally Surface Water should not be discharged into the river. Checks must be made by CYC to ensure that no cross connections on completion to ensure no contamination RSPB - In the absence of a HRA having been completed, this allocation is at risk of being neither legally compliant with the Conservation of Habitats and Species Regulations 2010 nor sound, as it may not be effective, justified or consistent with national planning policy. **Officers consider that the site should be retained as per the PSC boundary at 0.92ha and 32 dwellings. The site provides a natural extension to the existing village and is located within walking distance of local facilities. Previous analysis of the site at PSC confirmed that the southern hedgerow is of SINC quality and would need to be retained. In addition several trees are subject to TPO's and would need to be retained with an appropriate buffer for the tree canopies. A HRA screening will be undertaken to support the next stage of consultation in line with the regulations. This will take account of both individual sites and potential cumulative impacts of sites on designated areas including the Lower Derwent Valley.**
H43	Manor Farm Yard, Copmanthorpe	**Total Representations: 51** **Support: 41** **Objections: 7** **Comments: 4** Supports confirm that the site is suitable for the size of Copmanthorpe and its existing facilities and infrastructure. Objections regarding lack of local infrastructure, housing density too high and the farmyard is habitat to birds and bats. Historic England – Site adjoins boundary of Copmanthorpe Conservation area and Grade II listed building adjacent to north eastern corner of site. The Plan should make it clear that any development

Allocation Reference	Site Name	Officer Commentary
H43 Cont.....	Manor Farm Yard, Copmanthorpe Continued....	proposals would need to ensure that those elements that contribute to the significance of the CA and listed building are not harmed. No representation received from landowner/developer. Site was originally submitted through 2012 Call for Sites. No further representation has been submitted through Preferred Options (2013), Further Sites Consultation (2014) or PSC (2016). **Officers suggest that site should be removed from the Plan due to no confirmation of a willing landowner for the site, a requirement of NPPF. Site may be suitable for development but could come forward through planning application and would therefore be treated as a windfall site.**
H51	Morrell House	**Total Representations: 3** **Support: 1** **Objections: 0** **Comments: 2** Representation received from CYC Older Persons Accommodation Programme. States that Morrell House will remain in operation as a residential care home and will only close and become available for re-development once consultation on the option to close has been undertaken and following that should Executive make a decision to close. **Officer suggest that the site should be removed as a housing allocation within the Plan as there is no current certainty over delivery as a housing site within plan period.**
H52	Willow House EPH	**Total Representations: 5** **Support: 1** **Objections: 1** **Comments: 3** Support for use of brownfield land. Housing should be affordable and priority for young residents of the city who need housing.

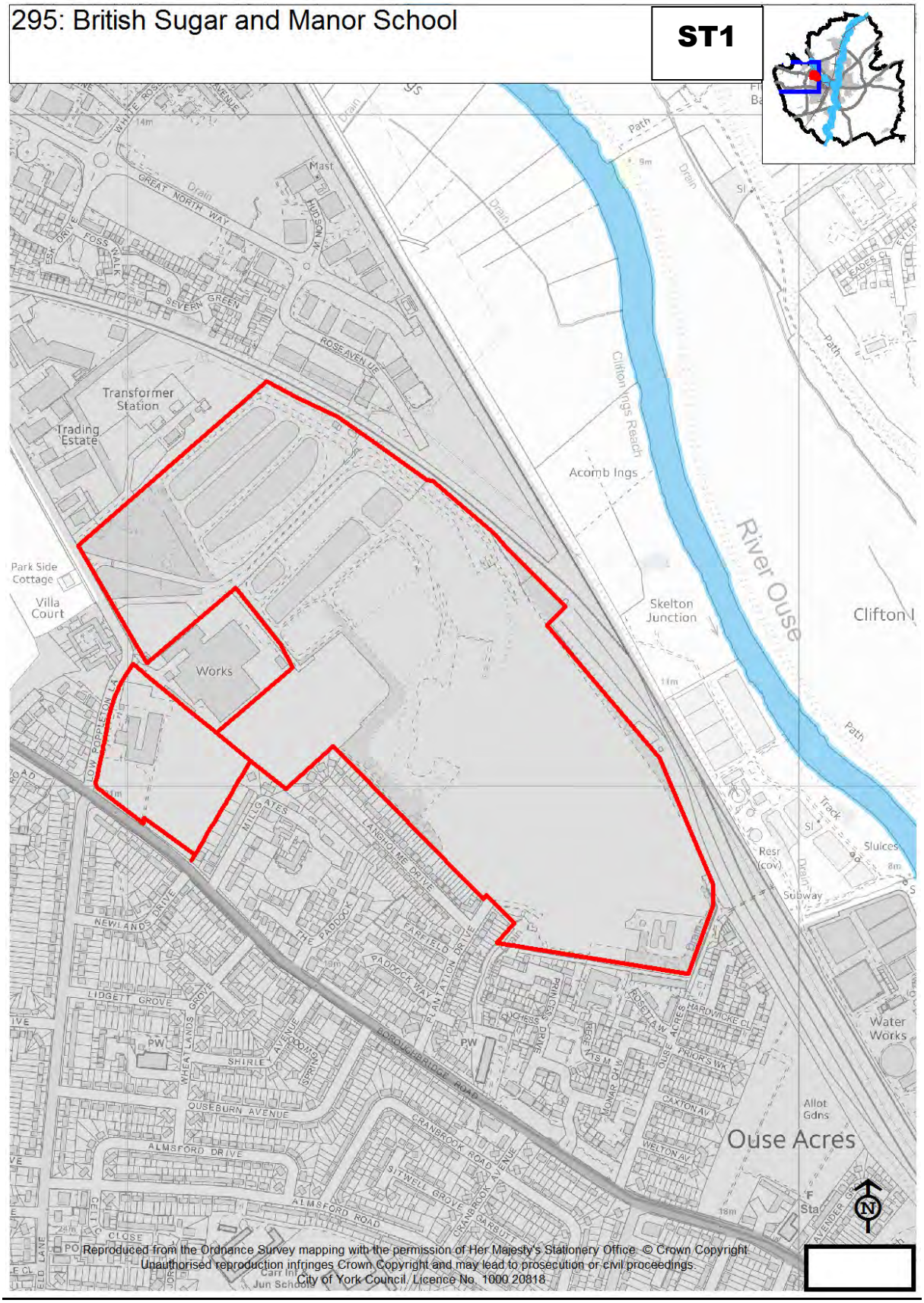
Allocation Reference	Site Name	Officer Commentary
H52 Cont....	Willow House EPH Continued.....	Objection to the closure of the elderly persons home. Historic England – Site adjoins the City Walls (SAM) and CHCCA. Given importance of City Walls great care would need to be taken in order to ensure that the elements which contribute to their significance are not harmed. Option to close the Older Persons Home and sell the site agreed by Executive in November 2016. **Officers suggest that the site should be retained as an allocation. Minor boundary amendment extends the site area to 0.3ha including an existing garage courtyard. Increase to estimated yield from 10 dwellings at PSC to 15 dwellings (100% @ 50 dph).**
H53	Land at Knapton Village	**Total Representations: 27** **Support: 3** **Objections: 22** **Comments: 2** Supports confirm that the site is suitable for hsouing but that the site capacity should be reduced to a maximum of 4 dwellings. Site is included as a potential site in the emerging neighbourhood plan for Rufforth and Knapton but with a maximum capacity of 4 units. Objections raised concerning the impact of 11 dwellings on the character of the village, housing number is too high, narrow lane which is not suitable for widening, current problems with existing drainage which will be exacerbated, loss of agricultural land and impact on mature trees. Also concerning lack of facilities within the village. Representation received from landowner/developer which supports the proposed allocation of land at Knapton village for residential use. Whilst Novus agrees the site is suitable to be allocated for residential use the assessments which have informed the planning application and subsequent feedback from the Council and local residents indicate that the indicative local plan capacity of 11 dwellings is too high. Technical site assessments undertaken to date suggest amendments are needed to the local plan site assessment proformas to indicate that access should be from Main Street and that the indicative capacity of 11 dwellings is too high. Site assessment work undertaken

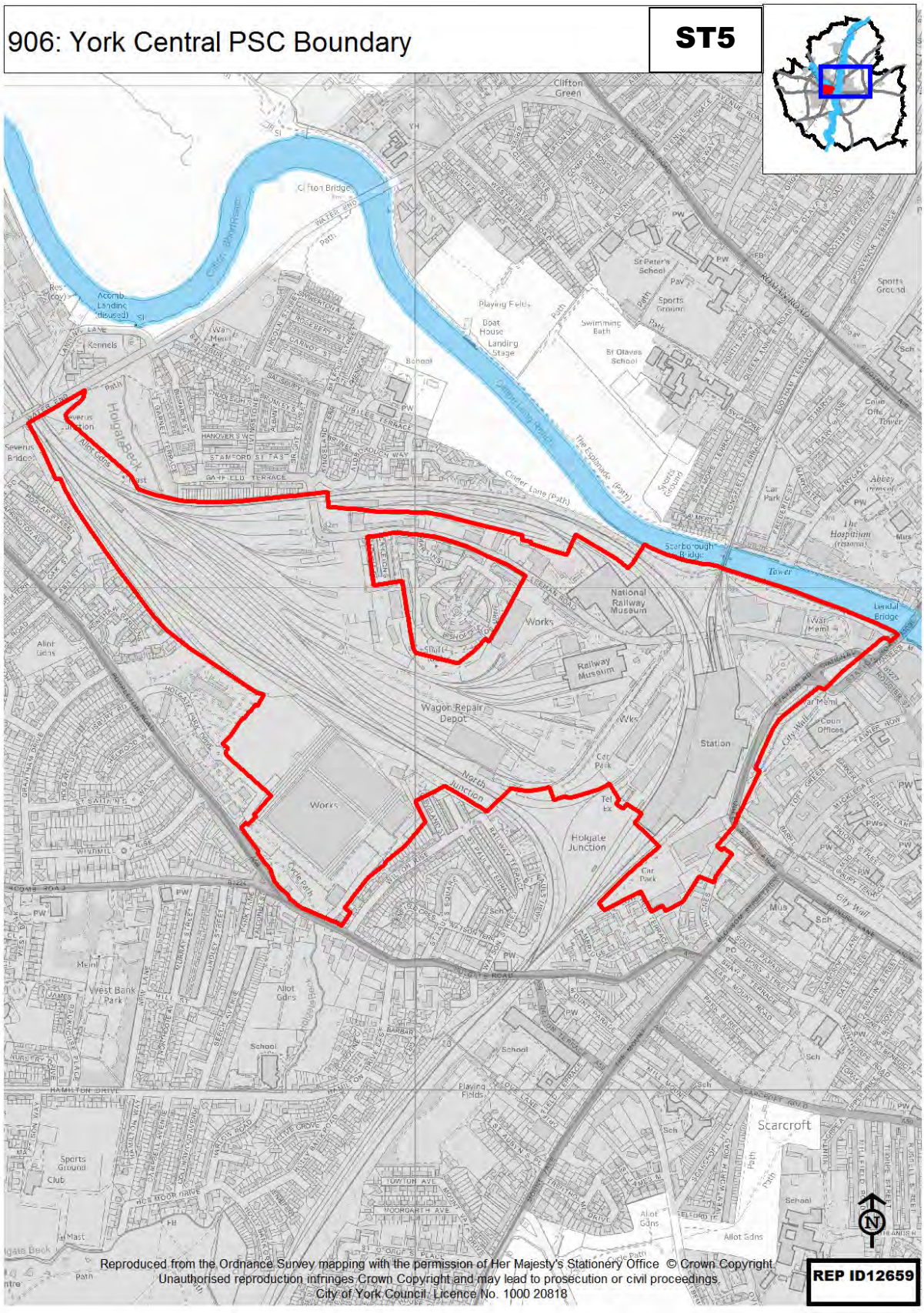
Allocation Reference	Site Name	Officer Commentary
H53 Cont....	Land at Knapton Village Continued....	suggests that it is more appropriate to access the site from Main Street rather than Back Lane. The figure of 11 dwellings included within the PSC is derived by applying a standard density of 35 dph to the site area of 0.33ha assuming a net to gross ratio of 100%. The total site area of 0.33ha includes a small area of land, circa 150 sqm to the east of Knapton Grange which would not be suitable for development and would likely be retained as garden space. Factoring in the retention of trees and hedges also reduces the net developable area. Assessment of the local area suggests that a smaller number would more appropriately reflect the local character. This would also be more inkeeping with the Village Design Statement which states that new infill within the settlement limit should not be so intensive so as to change the open weave of the village's overall character. It is considered that four houses would reflect the character of Knapton and the surrounding density. Planning application for four houses (16/00542/FUL) refused at October Planning Committee. Reasons for refusal are stated as inappropriate development in the greenbelt and no very special circumstances put forward that would outweigh harm incl. impact on openness of greenbelt, conflict with purposes of including land within the greenbelt. **Officers consider that the site should be retained as an allocation which fits with the emerging Rufforth and Knapton Neighbourhood Plan. It is suggested however that the standard density assumption is not applied given the further technical work which has been undertaken and highlighted above. It is considered that the estimated yield should be reduced to 4 dwellings.**
H55	Land at Layerthorpe	**Total Representations: 3** **Support: 2** **Objections: 1** **Comments: 0** Limited number of representations received. Supports agree with use of brownfield land for housing subject to controlling parking on Redeness Street. Objection relates to retaining the site for commercial land.

Allocation Reference	Site Name	Officer Commentary
		Officers suggest that the site should be retained as a housing site as per PSC.
H56	Land at Hull Road	**Total Representations: 24** **Support: 9** **Objections: 9** **Comments: 7** General supports confirm that site is a sustainable location for new housing, there is a need for family and affordable homes and that the site is screened by mature trees. Comments that access should not be taken from Windmill Lane to protect Heslington village. Objections relate primarily to loss of sports pitches and local green space without suitable local replacement and also regarding increased congestion on Hull Road. Also some concerns regarding the high number of dwellings suggested in the PSC. The allocation of the site for residential development is supported by the York St John University. Any future development of the site will have to retain significant tree belts on the northern and eastern boundaries, and existing tree planting on the west boundary. In addition new tree planting will be required to achieve an effective screen between the new development and the tennis centre. Retention of the existing access road will also be needed to maintain access to the tennis centre and to serve the proposed residential development. This would, in effect, divide the site into two developable areas separated by a shared access. This will reduce the capacity of the site to circa 80 dwellings. Sport England comment as follows: 'We note that the playing field will be replaced and equal in terms of quality, quantity and access. In respect of any proposals to replace playing field, replacement must represent a genuine replacement i.e. creation of a new playing field. Improvements to existing playing field do not represent a genuine replacement because the quantity element of the exception has not been addressed only the quality element. The quantity element can

Allocation Reference	Site Name	Officer Commentary
H56 Cont...	Land at Hull Road Continued...	be addressed by bringing into use areas of an existing playing field that are currently incapable of supporting a pitch or pitches without significant works, or creating new playing field on land that is not currently playing field' The planning application (16/02358/OUTM) was approved at planning committee on 15th June subject to referral to the Secretary of State and completion of planning obligations **Officer suggest that the allocation of the site should be retained in the Local Plan but with a reduced estimated yield of up to 70 dwellings to reflect the latest position.**
H57	Poppleton Garden Centre	**Total Representations: 38** **Support: 2** **Objections: 26** **Comments: 11** **Re-considered as employment site to reflect Poppleton Neighbourhood Plan. See Annex x, page x.**

Annex 3: Officers Assessment of Housing Sites following PSC




906: York Central PSC Boundary
ST5
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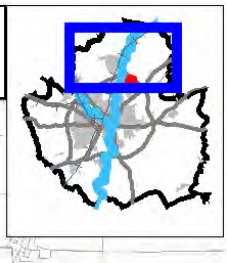
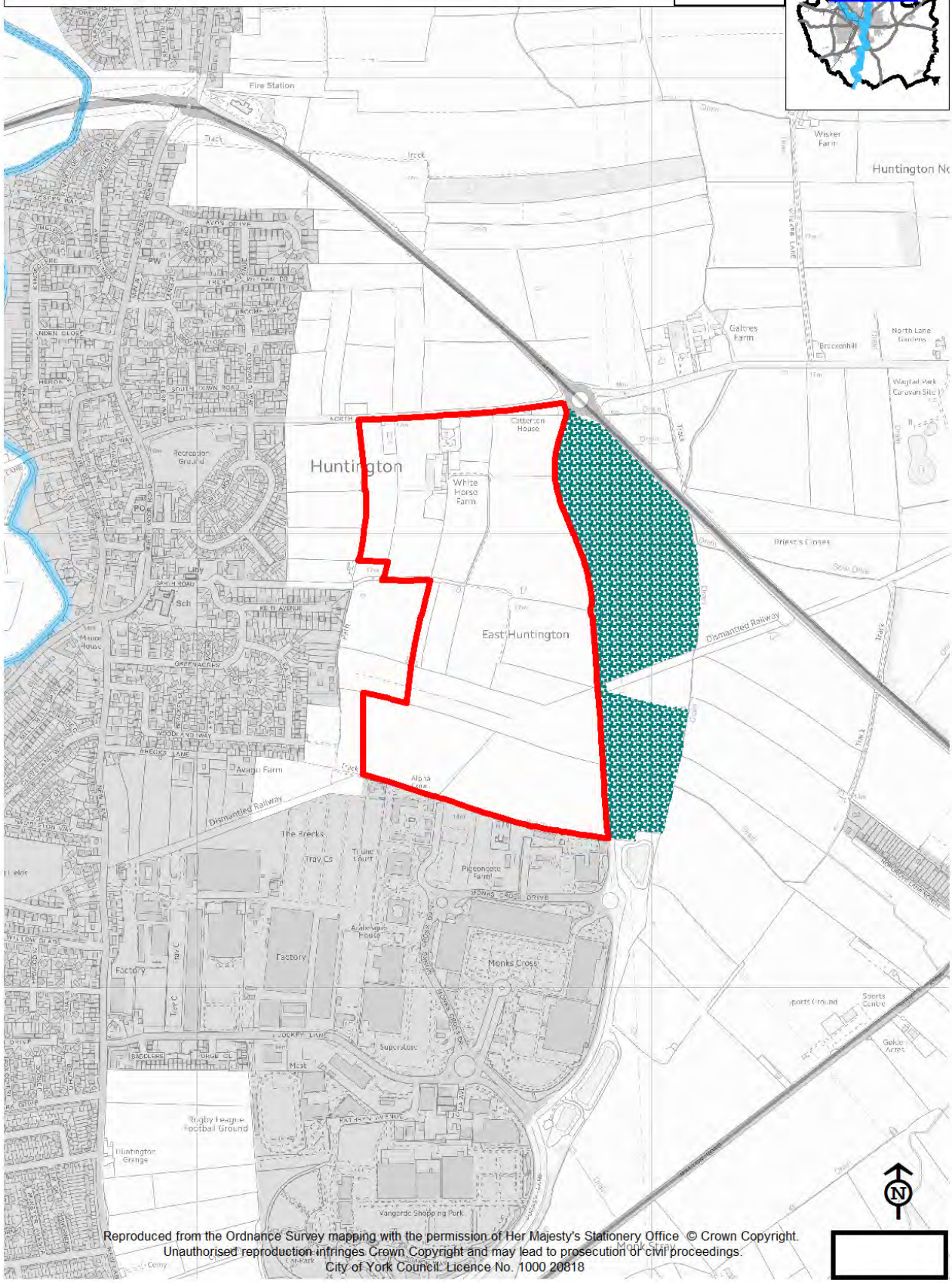
849: Revised North of Monks Cross

ST8





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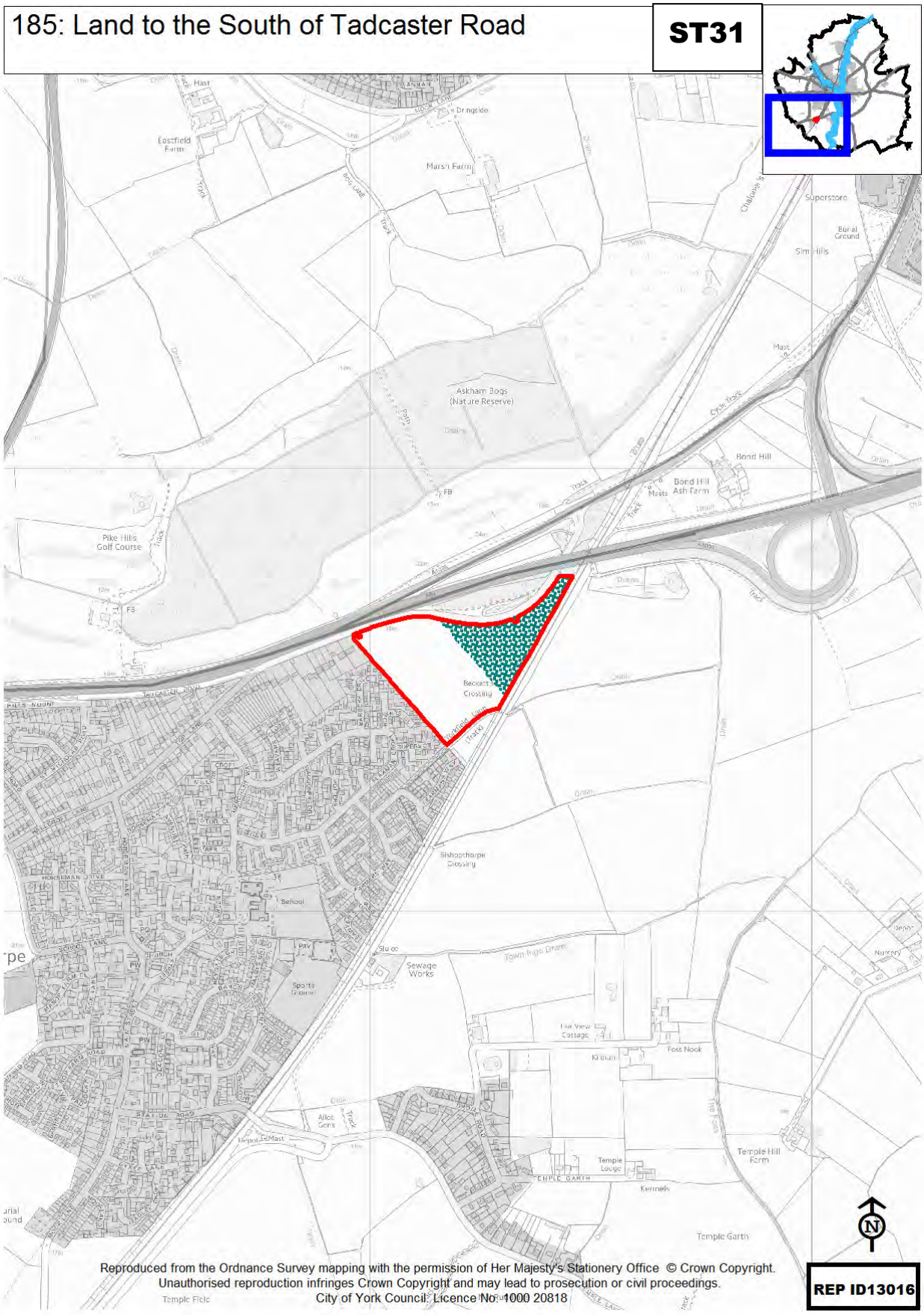
185: Land to the South of Tadcaster Road
ST31
Eastfield Farm
Marsh Farm
Askham Bogs (Nature Reserve)
Pike Hills Golf Course
Bond Hill Ash Farm
Superstore
Burial Ground
Sim Hills
Becket Crossing
Bishopthorpe Crossing
Sewage Works
Sports Ground
Temple Lodge
Temple Hill Farm
Kennels
Temple Garth
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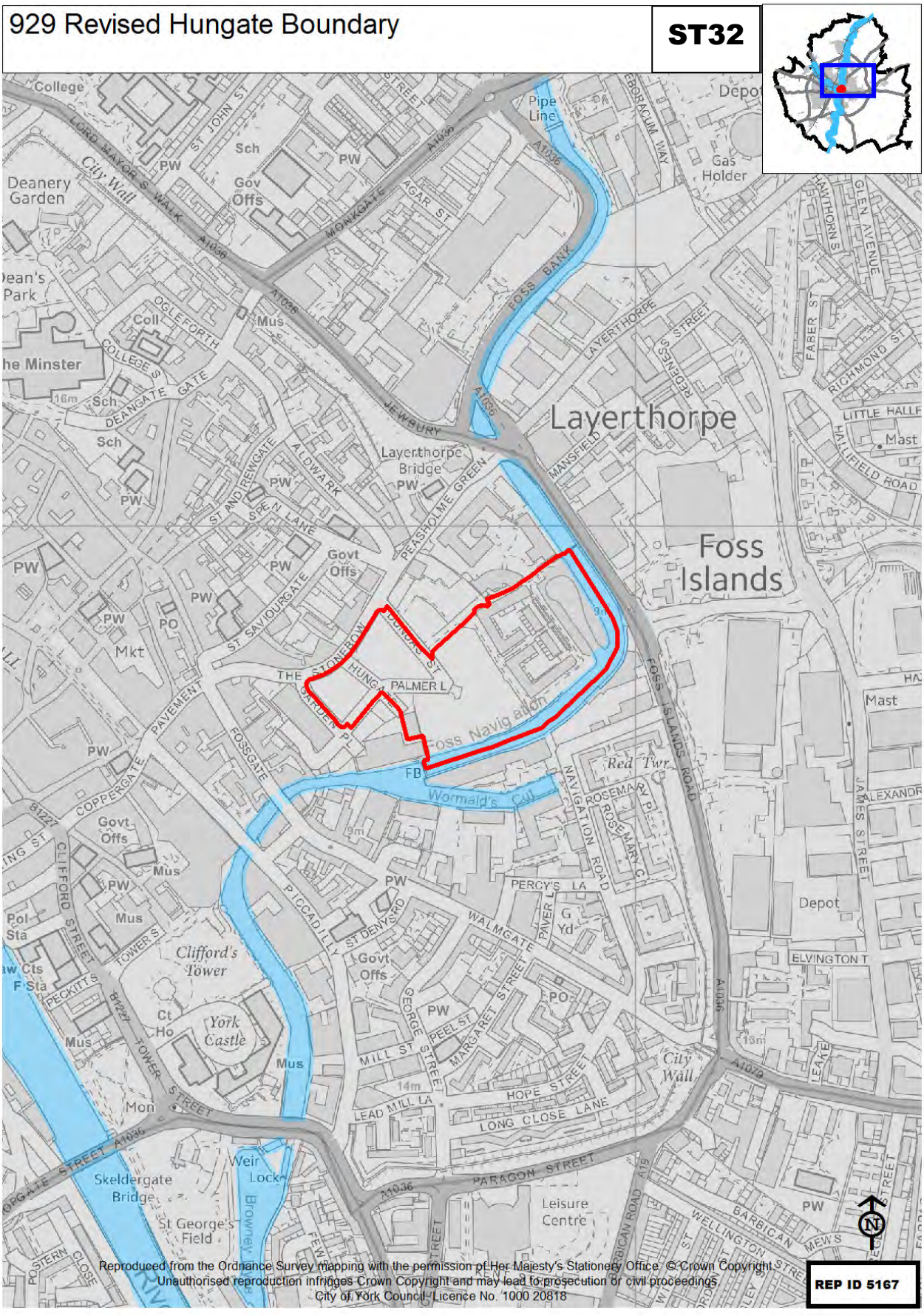
929 Revised Hungate Boundary
ST32
Layerthorpe
Foss Islands
Layerthorpe Bridge
Clifford's Tower
York Castle
Skeldergate Bridge
St George's Field
Leisure Centre
Depot
Gas Holder
Pipe Line
Foss Navig ation
Wormald's Cut
PALMER L
PEASHOLME GREEN
JEWBURY
MONKGATE
FOSS BANK
FOSS ISLANDS ROAD
PARAGON STREET
HOPE STREET
LONG CLOSE LANE
MILL ST
LEAD MILL LA
PICCADILLY
COPPERGATE
PAVEMENT
FOSSGATE
TOWER STREET
CLIFFORD STREET
WALMGATE
PERCY'S LA
ROSEMARY PL
NAVIGATION ROAD
ELVINGTON T
JAMES STREET
HALLIFIELD ROAD
MANSFIELD
LAYERTHORPE
REDEMESS STREET
RICHMOND ST
GLEN AVENUE
HAWTHORNS
FABER ST
LITTLE HALLF
Mast
Red Twr
Govt Offs
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PW
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Coll
Pol Sta
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Mon
G Yd
BARBICAN MEWS
WELLINGTON STREET
BARBICAN ROAD
A1036
A1079
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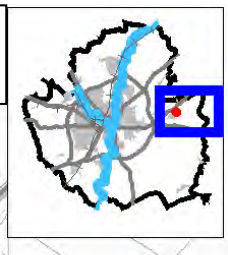
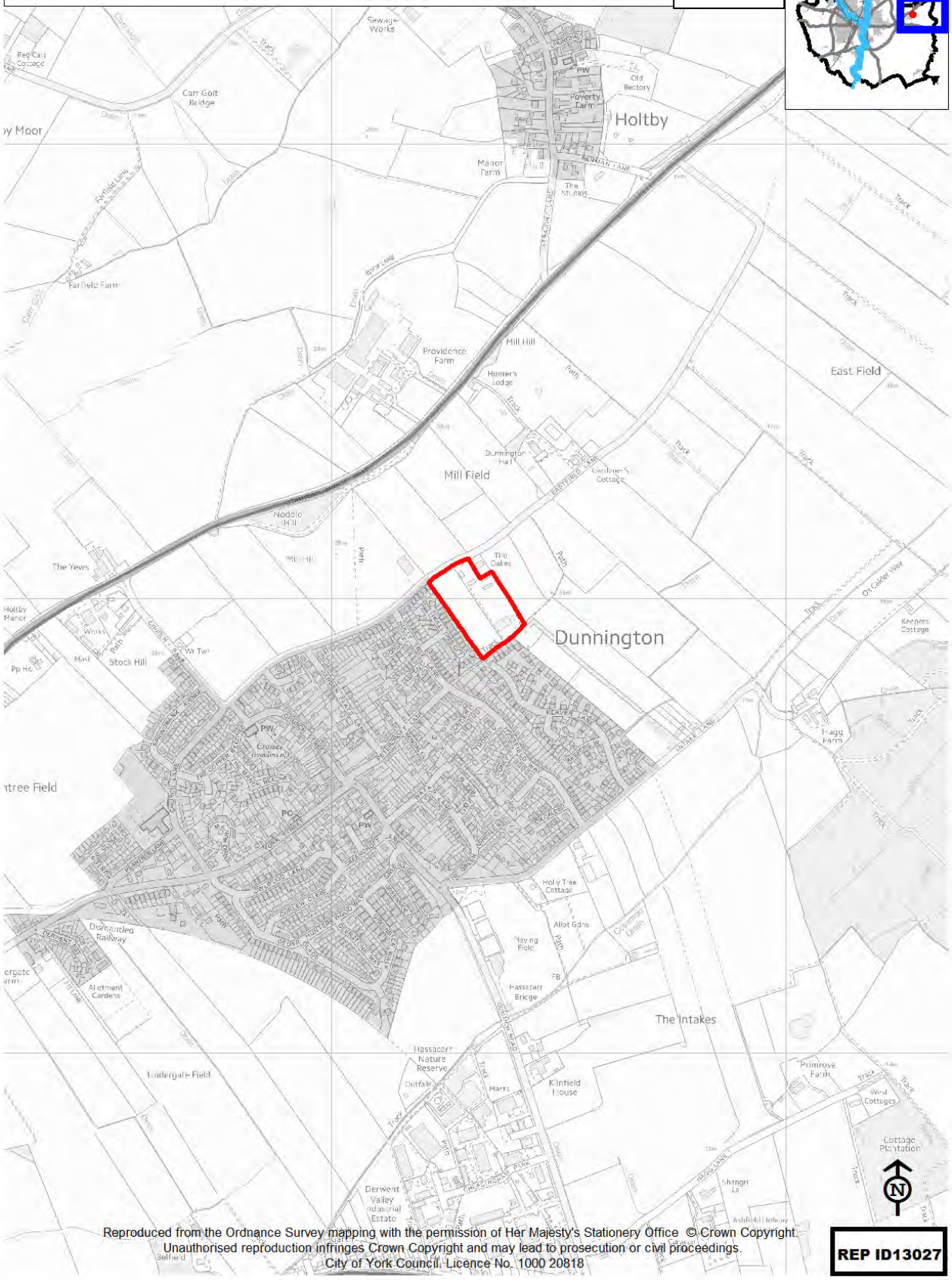
REP ID 5167

930: Revised Eastfield Lane Dunnington

H31





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REP ID13027

Table 3 – Officer assessment of technical evidence where addition or deletion of sites or boundary changes could be beneficial

Allocation Reference	Site Name	Officer Commentary
Strategic Sites		
ST7	Land East of Metcalfe Lane	**Total Representations:37** **Supports: 11** **Objections: 19** **Comments: 12** Historic England notes some potential for development to the east of York and that the extent of the PSC site is a big improvement on Publication Draft Local Plan boundary. However they identify potential harm to the special character and setting of the historic city by removing the gap between the ring road and the edge of York, changing the relationship between York and its villages. Suggested amendment could mitigate against this, notably by moving the eastern edge away from ring road/limiting scale of development. Other objections focus on the need to protect open land from further encroachment; that existing traffic on Hull Road makes residential development untenable; the site has drainage limitations; lack of local school space/other amenities; lack of natural/semi-natural open space. Heworth Without Parish Council welcomes the reduction in size of the proposed development, but suggests that it should be one of the last sites to be developed within the Plan period primarily due to the current infrastructure issues there are at present, most importantly access and the increase in traffic levels that such a development would have on Stockton Lane and Murton Way / Outgang Lane. They note the cumulative impact of traffic from other sites as a further concern. Other comments support the reduction in size of this allocation and scale of development proposed and that the proposal would create a separate 'garden village', distinct from the existing urban area. Changes will help to protect key views to the Minster (fundamental to the setting of York) and

Allocation Reference	Site Name	Officer Commentary
ST7 Cont...	Land East of Metcalfe Lane Continued....	support the proposal to protect the Millennium Way footpath linking York's historic strays with a 50m green buffer. Also support for green wedge from Stockton Lane to Bad Bargain Lane to safeguard the character of the area. Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a spoke facility (specification given) The developer/landowners support the principle of development of this site but state that the site is undeliverable under current proposals as the scale (845 dwellings) is too small to viably accommodate a garden village scheme incorporating substantial community infrastructure which is required to make the site sustainable and to meet the planning principles for the site set out in the PSC document. A new boundary proposed for an increase in site size from 34.5 ha to 44ha based on the evidence submitted demonstrating that the site needs to deliver a minimum of 975 homes. This is in association with the delivery of a Sub-Urban Garden Village design philosophy and the provision of substantial community infrastructure. **Officers suggest an increase to the overall site size from 34.5ha (845 dwellings) at PSC to 44ha (975 dwellings) could be made on the basis of the technical evidence submitted. This reflects developers/landowners concerns raised regarding the viability/deliverability of the PSC site, the related ability to deliver the planning principles including provision of educational and community facilities and concerns over the provision of site access to the south of the site. Officers consider that this boundary amendment could improve the viability of the site and ensure that the planning principles can be delivered. These include the creation of a new local centre providing an appropriate range of shops and community facilities to meet the needs of future residents. It could also allow the creation of a new primary school and the provision of a secondary school (in conjunction with site ST8) to the east of York as there is limited capacity in existing schools. Education and community provision would be required early in the schemes phasing in order to allow the establishment of a sustainable community. The planning principles also require the delivery of high quality, frequent public transport enabling a minimum of 15% of trips to be undertaken using PT as well as optimising pedestrian and cycle connectivity. See map on page 78 see also table 5 for alternative boundaries considered.**

Allocation Reference	Site Name	Officer Commentary
ST14	Land West of Wigginton Road	**Total Representations:113** **Supports: 20** **Objections: 72** **Comments: 27** Support is given to the principle of development in this location on the basis that the necessary dualling of the A1237 should precede any development and that as a stand alone 'garden village' it should provide for its own services and facilities and appropriate infrastructure. Historic England recommends that there is considerable merit in continuing to explore the potential offered by this new settlement - the degree of harm caused to York's special character and setting could be much less than that caused were a similar scale of development located on the edge of the built up area of York, or within existing surrounding villages. The developer/landowners fully support the principle of the proposed allocation, and of delivering a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and open space (incl recreational facilities). However in order to achieve this consideration of additional land is requested and is detailed below. A number of objections were received on this site. Key issues raised include: • Impact of the scale of development proposed on the green belt/landscape/ and agricultural land; • Site's capacity is not of sufficient scale to provide a range of facilities and services required for a stand-alone settlement; • Highways (and associated air quality) impacts will be significant, particularly oto the already congested ring road. Rural roads are already affected - Skelton and settlements to the east already experience traffic seeking to avoid congested ring road in places these roads are too narrow to cope. Developments will exacerbate this problem. Note the cumulative impact of other development;

Allocation Reference	Site Name	Officer Commentary
ST14 Cont...	Land West of Wigginton Road Continued....	• Extensive infrastructure requirements are unlikely to be deliverable in the suggested timescale; • Potential drainage/flooding problems. The developers/landowners put forward two alternative boundary amendments to the PSC site bin order to improve the viability of the site and to ensure the planning principles can be delivered. The first option includes an increase in the site boundary from 55 ha to 65ha delivering a minimum of 1,350 homes (site 915). The second proposal is for an increase in site size to 72.73ha delivering 1,725 homes. **Officers have considered the evidence submitted by the landowner/developer and suggest that an increase to the overall site size from 55ha (1348 dwellings) at PSC to 68ha (1672 dwellings) could be made. This reflects developers/landowners concerns regarding the viability/deliverability of the site and the ability to deliver the planning principles including the significant infrastructure requirements given the sites location adjacent to the A1237. The site's planning principles/policy require the provision of a local centre incorporating appropriate shops, services and community facilities along with on-site nursery and primary provisions and financial contributions for secondary school places. There are also substantial transport infrastructure requirements including new all purpose access roads/roundabouts to the east/south from A1237/Wigginton Road roundabout and off the Wigginton Road (B1363). There is also a requirement to deliver a minimum of 15% public transport trips and high quality safe pedestrian cycle links including the provision of a overbridge to allow access to the Clifton Moor area. Providing sufficient access to and mitigating the impacts of the development would require substantial infrastructure to be put in place at a significant level of cost to the developer. See map on Page 79.** Alternative boundaries submitted for the site are listed in Table 4 and are detailed in the Consultation Statement included as Annex 7 to the Executive report. These representations from the developer included a further extension to the north of the site (6ha) which has not been included by officers due to concerns about the impact of the development on Moor Lane.

Allocation Reference	Site Name	Officer Commentary
ST15	Land West of Elvington Lane	**Total Representations:167** **Supports: 33** **Objections: 103** **Comments: 42** A supportive response was received for the principle of development on this site. Key issues raised include: • Support the principle of developing brownfield land; • Support the opportunities offered by developing a holistically planned settlement • A strategy in which part of York's development needs are met in new freestanding settlements beyond the ring road might help to safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built-up area of York to its surrounding settlements. (Historic England) A number of members of the public support the allocation, on the grounds that it will help meet the development needs of the City, reduce development pressures on other parts of the City, provide a 'garden suburb new village' south of York, support the change to move the site away from the A64, by adding a new junction onto the A64 it would reduce congestion at Grimston Bar, avoid floodplain areas, reduce the size of the site, less obtrusive location, could absorb the housing numbers proposed in site ST33, but also note that the infrastructure requirements, services (eg. Roads, sewers etc) and facilities and the impact on Heslington Tillmire (inc buffer) would need careful consideration. The developers/landowners are generally in support of the allocation but propose an alternative boundary (site ref 924). This includes a 41ha extension to north west of ST15, extension along Elvington Airfield to south-east, removal of land in third party ownership until technical suitability of this area can be proven as being appropriate and necessary and the removal of western airfield component. This would increase the brownfield intake, increase the number of new homes delivered and would create a net-gain in biodiversity.

Allocation Reference	Site Name	Officer Commentary
ST15 Cont...	Land West of Elvington Lane Continued.....	Objections/comments on the site are as follows: <u>Natural Environment/Ecology</u> • The previous Habitat Enhancement Area appears to be excluded from the site map, with no alternative marked. No information is provided to indicate that any work has been undertaken on the recreation strategy. Further, the inclusion of a large part of Elvington Airfield, including parts of the SINC, without assessment of either direct or indirect impacts of the housing allocation, is concerning, particularly in light of the Council's own previously negative assessment of allocation here. If ST15 is allocated in advance of the HEA, the recreation strategy and all other mitigation measures being secured through policy there is a high risk of the allocation being found unsound (RSPB). • Natural England confirms that previous concerns regarding the proximity of the site to the Tilmire SSSI have been partly satisfied as the site has been moved away from the SSSI and proposed housing numbers reduced. Still concerns re potential impacts from visitors to SSSI and consider that mitigation tailored to specific site should be required. Site now closer to Elvington Airfield SINC which will require mitigation. Also consider impact on bird species on candidate SINC and mitigate. We would need to see more details of the mitigation scheme before we could fully assess the impacts of such an allocation. Given the sensitivity of the location, we advise that the council considers including detailed masterplanning of the proposal including mitigation measures and bespoke policy in order to ensure delivery of measures. In addition we would like to see a requirement for mitigation measures to be delivered prior to the commencement of development • Objecting to ST15 Land to the West of Elvington Lane due to, proximity to the impact zone for Lower Derwent Valley Special Protection Area (Flooding and Birds), closeness to the SSSI the Heslington Tilmire, lack of a habitat enhancement area, fragmentation of the Ouse and Lower Derwent Valley and loss of habitats (birds), being within a site of importance for nature conservation, disruption to bird breeding, proximity to A64 deterrent to cyclists, complexity of long term management with multiple landowners, habitat enhancement areas will be difficult to ensure and lack of a master plan. The original habitat enhancement area should remain

Allocation Reference	Site Name	Officer Commentary
ST15 Cont...	Land West of Elvington Lane Continued.....	with buffer areas, a long term management plan is needed, researched access, a recreation plan and a master plan. (Yorkshire Wildlife Trust) • Object to the site because to now include a significant part of the Elvington Airfield site (Site 607) having previously rejected it because of the ecological impact is illogical and inconsistent. No change in circumstances is listed which would explain this choice of a previously rejected site. The site does not avoid impacts on Heslington Tillmire, which is a Site of Special Scientific Interest - the highest national level of environmental protection. The Tillmire is 6km from the River Derwent and the YWT reserve of Wheldrake Ings. It is very likely that birds, particularly waders, will move frequently between the area of the Tillmire where they breed and the Lower Derwent Valley (LDV) for feeding. Much of the L DV is under EU legislation designated a Special Protection Area (SPA) which provides a higher level of protection not only on the SPA but on adjacent areas like the Tillmire. If ST15 remains in the Local Plan any development must be consistent with the following principles: 1. A full objective assessment of the Tillmire for devising measures which will protect and isolate it from any damaging impact from development. Such measures must be implemented before any further development takes place and be fuly funded by landowners/developers; 2. a buffer zone in excess of £500m needs to be established to minimise any form of disturbance or impact on the two SSSIs; 3. the lack of inclusion of a Habitat Enhancement Area (HEA) in the allocation is a retrograde step form the 2014 Local Plan which provided grater certainty that a buffer zone and HEA would be provided; 4. funding needs to be provided by landowners/developers in perpetuity to ensure the ongoing proper management of buffer zones (York Ornithological Club). <u>Traffic and Access</u> • Whilst the Trust supports some of the changes made by CYC since last consultation, there are still concerns over traffic and access through Heslington, site location and Tilmire SSSI, historic views, viability of development which may lead to expansion of site or increase in density (Heslington Village Trust). • The need for new access to the A64 could render the scheme unviable. • Site is remote from public transport access

Allocation Reference	Site Name	Officer Commentary
ST15 Cont...	Land West of Elvington Lane Continued.....	• Note the wider impact of traffic generated/displaced by this development. • Concern around use of Elvington Lane for any form of access to the site. • Allocation has improved since last LP draft - it is reduced in size and located further from A64. A stand alone settlement is likely to cause less harm on the setting on York than an extension on the urban edge. However, it is by no means clear what impact the infrastructure necessary to deliver this new settlement will have upon York's special character and setting. As we made clear in our response to the last consultation, this aspect is of paramount importance. The Plan will need to demonstrate that this area can deliver the scale of growth anticipated in a manner commensurate with safeguarding those elements which make York such a special place. In the absence of this information, this allocation has potential to result in serious harm to SA Objective 14. (Historic England). <u>Delivery issues/other infrastructure</u> • No certainty over delivery rates due to complexities of site including land ownership, viability and developer interest. • Not of sufficient size to deliver required social and physical infrastructure. • Site could only provide new homes at end of plan period due to long lead-in times. • Site scores negatively in interim SA. • Doubts about site's viability and deliverability, particularly because of infrastructure requirements • Smaller more sustainable sites are situated on the edge of the existing settlement that could deliver housing promptly and sustainably and thereby boost housing supply in accordance with national policy. • A wide range of sites should be considered rather than CYC putting all of its eggs in one basket. **Officers have considered the evidence submitted by the landowner/developer and suggest that an increase to the overall site size from 159ha (3,339 dwellings) at PSC to 216ha (3901dwellings) could be made. This reflects developer/landowner concerns raised regarding the viability/deliverability of the site and the ability to deliver the planning principles**

Allocation Reference	Site Name	Officer Commentary
ST15 Cont...	Land West of Elvington Lane Continued.....	**including the significant requirement for ecological mitigation, the infrastructure requirements including a new junction from the A64 and the creation of sustainable transport routes to deliver a minimum of 15% of trips by public transport and the provision of the community infrastructure required to deliver a sustainable garden village including on-site nursery, primary and potentially secondary provision.** **The suggested boundary amendments also reflects consideration of the latest technical evidence relating to ecological mitigation/biodiversity off-setting and the provision of enlarged areas of public openspace and habitat enhancement areas adjacent to Heslington Tillmire (SSSI) and the SINC site to the west of Elvington Airfield. Changes would need to be made to the planning principles for the site to illustrate the extent of the HEA including the addition of this boundary to the proposals map for clarity. It is also considered that the planning principles could be amended to require upfront delivery of the ecological compensation areas including the HEA e.g. prior to construction and for it to be retained in perpetuity. The planning principles would also specify the requirement for greater clarity on recreational routes, particularly in relation to the Tilmire SSSI. See map on Page 80.** Alternative boundaries to the ST15 site were also submitted by separate landowners/developers. These are listed in Table 4 to this annex and are detailed in the Consultation Statement attached as Annex 6 to the Executive report. **Officers are not recommending the inclusion of further land to the north of the PSC boundary adjacent to the Minster Way (42ha) due to concerns relating to landscape and heritage impacts.**
ST17	Nestle South	**Total Representations:9** **Supports: 4** **Objections: 2** **Comments: 3** Historic England supports the Plan's stated Planning Principles and expect much of the commentary regarding the need for a masterplan to be prepared and the retention of those buildings considered to be of importance to be incorporated into the Plan's policy for this allocation.

Allocation Reference	Site Name	Officer Commentary
ST17 Cont....	Nestle South Continued.....	Other respondents support the principle of prioritising housing development on brownfield sites. Those objecting raise concerns regarding increased traffic and congestion, especially on Wigginton road and loss of green space (and wildlife). Comments broadly relate to the need for supporting services and amenities. One comment suggests the site contribute to a stop on the York-Scarborough train line which (along with H7) could facilitate a tram-train service. **A planning application has been submitted for part of the site (17/00284/FULM) for 258 dwellings on approx 2.35ha. Officers consider that this element of the site should be considered as phase 1 of the site with an earlier delivery timeframe. This application was approved at planning committee on the 15th June 2017 subject to confirmation of agreement to appropriate levels of education and open space contributions and completion of a S106 agreement relating to affordable housing provision, open space, education and highways. See map on page 81.** **Officers suggest that the remainder of the overall Nestle South site (4.74ha) could be included in the Local Plan for phase 2 of the site and that it could provide up to 600 additional dwellings based on suitable density levels for this type of site. This would increase the overall quantum for the whole site to circa 860 units. See Map on page 82.**
Former SF15	Land North of Escrick	**Site not included in PSC (2016)** **Total Representations:2** **Supports: 1** **Objections: 1** **Comments: 0** Support for the removal of SF15 from Escrick Parish Council, which was felt to be disproportionate to Escrick and other villages' allocations, poorly served by /accessible to York's infrastructure and services and detrimental to the character of Escrick.

Allocation Reference	Site Name	Officer Commentary
Former SF15 Cont....	Land North of Escrick Continued.....	Objection to the site received from the developer (Linden Homes). Site should be allocated as a housing site (noting new boundary proposed to incorporate land to the east for biodiversity enhancement/amenity/ drainage area as needed), on the following grounds: well positioned site to immediate north of existing built form of Escrick; offers a highly sustainable opportunity - the site is well served by a range of local services and facilities to meet day to day needs and also benefits from frequent bus services along the A19 to York and Selby. Additional buffering could be formed to screen the site further from the surrounding countryside. Previous representations made in respect of highways issues were made in July 2014 that demonstrated that the junction between the A19 and New Road has sufficient capacity to deal with additional residents, connectivity of the site to the existing built form can be improved for pedestrians/cyclists through use of an existing track to west of the site and through a potential new footpath/cycleway at sites south-west edge. The developer would agree to improvements at the junction of Skipwith Road and A19. Pedestrian/cycle links can be improved. Note that surface water drainage solution and provision of an additional biodiversity area at land west of Blanshard's Wood would enhance local bio-diversity.. Any future development would clearly have to pay due regard to the Conservation Area. A comprehensive Landscape Report relating to this site and surrounds has been submitted. Further, in terms of the Council's Duty to Cooperate re Selby, the site provides land for housing within an area appropriate to Selby's spatial strategy. **The site was previously included in the halted Publication Draft Local Plan (2014) as safeguarded land to reflect the position of Selby District Council and their emerging allocations given its location on the boundary between City of York and the Selby district area. The site passes the site selection methodology and there are no showstoppers identified through the technical officer assessment. Officers suggest that the site could be included as an allocation for the post plan period (2033-2038) to reflect the current uncertainty around the position of the emerging Plan Selby. See map on page 83 .**

Allocation Reference	Site Name	Officer Commentary
Non- Strategic Sites		
Site H2b	Land at Cherry Lane	**<u>Deleted H2b: Land at Cherry Lane</u>** **Total Representations: 2** **Supports: 1** **Objections: 1** **Comments: 0** Support for the site's removal from the plan given its potential to impact on one of the City's main approaches/prime attractions (Racecourse) The prospective developer (Shepherd Homes) objects to the site's deletion as they consider it a deliverable and sustainable small site able to feed into the short-term housing supply. **The site was removed from PSC on access grounds given restricted narrow access to the site via Cherry Lane and also because the site contains mature hedgerows and trees which would impact on the developable area. Technical officer assessment considers that the reduced site area could be suitable for development if existing trees and hedgerows can be retained and if it can be developed in a way which retains the rural character of Cherry Lane. See map on page 84.** Alternative boundaries to the H2b were also submitted by separate landowners/developers. These are listed in Table 4 to this annex and are detailed in the Consultation Statement attached as Annex 6 to the Executive report. This larger site submitted to the east is not supported by the technical officer assessment as it is considered this would have an adverse impact on the character of Cherry Lane and the open aspect to the Knavesmire.

Allocation Reference	Site Name	Officer Commentary
Site H12	Land R/O Stockton Lane/Greenfield Park Drive	**<u>Deleted H12: r/o Stockton Lane</u>** **Total Representations: 3** **Supports: 1** **Objections: 2** **Comments: 0** Support for the site's removal on grounds of potential to increase congestion on surrounding roads. Developers/landowner query the Council's stated transport access issues, stating that access to the site is not constrained and the full capacity of the site can be delivered. Planning Application/Transport Assessment is currently being prepared. They consider that the site should be re-examined and re-instated as a housing allocation. **Current planning application awaiting determination for 9 dwellings. The site passes the site selection criteria and technical officer assessment should appropriate access, drainage and design and conservation issues be adequately addressed through the development management process.** **Officers consider therefore that the site could be included as an allocation within the Plan** **See map on page 85.**
Site H23	Grove House	**<u>Deleted H23: Grove House</u>** **Total Representations: 2** **Supports: 0** **Objections: 1** **Comments: 1** Both respondents comment that the site has been marketed. Note that Executive has supported the best offer for the site, for general housing development.

Allocation Reference	Site Name	Officer Commentary
Site H23 Cont.....	Grove House Continued....	**Site was removed from PSC as at that time there was uncertainty over the future use of the site and was therefore not considered suitable for allocation. As confirmed through the consultation the site has now been agreed for sale for re-development. The site has been marketed and Executive has agreed to accept the best offer for the site (general housing).** **Officers consider therefore that the site could be included as an allocation within the Plan** **See map on page 86.**
Site H25	Heworth Green North	**<u>Deleted H25: Heworth Green North</u>** **Total Representations: 1** **Supports: 0** **Objections: 1** **Comments: 0** Tiger Developments, on behalf of the landowner, propose the reinstatement of the site as a designated residential and mixed-use development site within the Council's Local Plan. The site represents an available vacant brownfield site in a suitable location within walking distance to York City Centre. The site has been deleted due to concerns over flooding and issues of deliverability/willingness of the landowner. However, upon review the site is not located within Flood Zone 3 and only partially located within Flood Zone 2. Furthermore, the landowner has already commenced pre-application discussions with the Council over the potential redevelopment of the site, demonstrating a willingness to see the site developed. The site is considered suitable for redevelopment including residential led mixed-use development, hotel, student accommodation or retail. **The site was removed from the PSC due to concerns over flood risk as the site contains areas of flood zone 2 and 3a. It was stated that the site may be suitable for re-development subject to suitable assessment and mitigation. To the north is a residential and employment scheme and to the north west recent a planning permission (14/00112/FULM) for hotel, drive thru and the extension of James Street/Heworth Green Link Road which forms one of the**

Allocation Reference	Site Name	Officer Commentary
Site H25 Cont...	Heworth Green North Continued....	**boundaries to the site. To the north east is the Heworth Gas Works allocation (H1). Representation from landowners confirms that the site is partly in flood zone 2 and not 3a and that this should not be a showstopper as can be mitigated through design. Site boundary submitted through PSC consultation shows site with reduced boundary due to road alignment. This reduces the site area to 0.19ha and therefore is under the 0.2ha site allocation threshold for Local Plan allocation. If the site was to come forward through the planning application process it would therefore be treated as a small site windfall.** **Officers consider therefore that the site should be deleted as an allocation within the Plan as it is under threshold. See map on page 87.**
Site H28	Land to north of North Lane, Wheldrake	**Deleted H28: Land North of North Lane, Wheldrake** **Total Representations: 7** **Supports: 5** **Objections: 1** **Comments: 1** Those supporting the site's removal from the plan do so principally on the grounds that the site is currently Greenfield/ draft green belt and would result in the loss of natural open space. Further access issues and highway safety concerns have been raised. Drainage/sewerage is noted as being a problem in the North Lane area. The prospective developer (Linden Homes) objects to the site's proposed deletion. They consider that the site serves no (or limited) green belt purpose, and that (in response to particular issues raised in PSC, 2016) there are two available vehicular access points to serve the site. On this basis there is no constraint to development and as such it should be allocated for housing. **The site was removed from the PSC due to concerns regarding site access which required further detailed survey/analysis. The PSC stated that the proposed access via Cranbrooks, North Lane or Valley View needed to be investigated further given they are narrow residential streets and that there were potential visibility and footways issues. The representation and**

Allocation Reference	Site Name	Officer Commentary
Site H28 Cont...	Land to north of North Lane, Wheldrake Continued....	**further technical evidence received through the consultation demonstrates that whilst the site has three potential access points via North Lane, Cranbrooks and Valley View that North Lane is the preferred access point and this is supported by the Transport Statement. Assessment through the technical officer groups confirms that there is no 'access' showstopper as the principle of access can be adequately demonstrated**. **Officers consider therefore that the site could be included as an allocation within the Plan see map on page 88.**
Site H37	Land at Greystones, Haxby	**Deleted H37: Greystones, Haxby** **Total Representations: 7** **Supports: 6** **Objections: 1** **Comments: 0** General support for the site's removal from the emerging Plan, including from Haxby Town Council and Strensall with Towthorpe PC, given the likely impact of the scale of development on Haxby's road network. The Developer/landowner refute objections raised to the site's development, namely in relation to technical constraints identified (drainage, green belt and transport). They point to the Council's earlier support for the site as an allocation (Publication stage (Sept 2014). They consider that, as is the case with any new development, it will be required to address any infrastructure deficiencies through appropriate CIL payments at a future planning application stage. The site is promoted alongside a generous provision of enhanced, public open space (incorporating a woodland walk, balancing ponds and reed beds) which is proposed to be dedicated to York City Council/ or Haxby Town Council in perpetuity and to remain within the green belt. **The site was removed from the PSC primarily due to potential drainage and flood risk issues. The site contains elements of flood risk 2 and is adjacent to flood risk zone 3b. The representation confirms that the total site area is 3.57ha with a 1.95ha developable area**

Allocation Reference	Site Name	Officer Commentary
Site H37 Cont...	Land at Greystones, Haxby Continued....	**(55%). The remainder of the site area will be open space. The development and the required SUDS will be located wholly in flood zone 1. Access will be via Greystone Court. Yorkshire Water has confirmed that they have no objection in principle in terms of foul water discharge or surface water.** **Officers consider therefore that the site could be included as an allocation within the Plan see map on page 89.**
H38	Land to rear of Rufforth Primary School	**H38: Land r/o Rufforth School** **Total Representations: 19** **Supports: 8** **Objections: 10** **Comments: 1** Support for the site being included as an allocation focuses on the potential for the site to deliver small scale development/affordable housing in the village. Conditional support from Rufforth and Knapton Parish Council and from the emerging Rufforth and Knapton Neighbourhood Plan points to the need for further consideration to be given to an appropriate mix/type of housing, parking provision, sewerage and drainage. The developer supports the site's development, noting that the site was assessed as part of CYCs rigorous site selection methodology and as a result of passing the process the site was proposed as a housing allocation in previous versions of the draft local plan. Suitability of the site is not therefore in question. They also confirm that the site is available, and deliverable. Those objecting to the site's development point to the likely negative impact on local amenity, namely in terms of additional traffic, impact on village character and community, poor sewerage and drainage (potential for flood risk) and lack of local facilities, including school spaces. Development of green belt land is also a concern. A number of objections comment on the approval of a pig-breeding barn adjacent to the site, bringing it closer to domestic dwellings than when approval was granted.

Allocation Reference	Site Name	Officer Commentary
H38 Cont...	Land to rear of Rufforth Primary School Continued....	**As part of the developer's representation a boundary extension was submitted for the site. In the PSC (2016) Site H38 was allocated for 0.99ha and up to 33 dwellings. The additional land could increase the site by a further 1.42ha (+47 dwellings). The extended site follows the existing field boundary to the rear of the school. The site is well contained with clearly defined boundaries including existing residential properties and tall/extensive hedgerows. The original site (H33) is included within the emerging Rufforth Neighbourhood Plan as a potential residential site**. **Officers suggest that the site could be extended to a total site area of 2.41ha and up to 80 dwellings. This is based on a large village archetype of 95% @ 35dph. See map on page 90.**
H46	Land North of Willow Bank and East of Haxby Road	**H46: Land north of Willow Bank and East of Haxby Road** **Total Representations: 86** **Supports: 5** **Objections: 48** **Comments: 35** Both objections and comments to the scheme raise similar issues: the likely impact of development on traffic and congestion (locally, and onto the A1237), lack of local services/infrastructure, poor drainage and flood risk. Concerns are also raised regarding the loss of the sports club and MUGA in New Earswick. While Joseph Rowntree Housing Trust fully support the site's allocation, they object to the Council's stated reasoning for the split between built and open space; they do not consider it possible to produce a housing scheme for 104 dwellings on approx half of the site in a form which reflects the character of the village itself. It is not accepted that there is a deficiency of open space in New Earswick. It is not accepted that the site is part of a local green infrastructure corridor linking New Earswick and Huntington along the Foss corridor. Ecological concerns have now been clarified and resolved. The site will promote a mixed of cohesive community providing a wide range of housing mix. The site is not at risk of flooding. The proposal will be sustainable in terms of physical characteristics, character and social composition. residential development are to be built away from

Allocation Reference	Site Name	Officer Commentary
H46 Cont...		listed buildings. Changes have been made to the layout of for more flexible living and self- help ethos. This development will help meet the Trust's and The City's need for affordable housing. The proposal will not affect visual importance as views of the church are now all but obscured by the dense tree belt along the eastern boundary and landscape character will be retained. A number of comments were received from specific/statutory bodies, as follows: - Historic England raise no objection in principle, but comment that the plan should make it clear that any development would need to ensure that those elements which contribute to the significance of the New Earswick Conservation Area are not harmed. - Yorkshire Wildlife Trust note that bats are likely to live on site and lighting of new housing would disturb them and the layout of the site will need to factor this in by possibly locating housing to the South of the site. - Wigginton Parish Council do not object in principle but comment that the necessary infrastructure must be addressed before development commences, in terms of schools; housing mix and type; upgrades to transport infrastructure (strategic network and local roads); public transport; congestion and parking; pedestrian safety; sewerage and drainage; employment, training and development; retail facilities; environmental issues; impact of construction on existing residents and businesses. - River Foss Society support the principle of a green corridor, and consider that the run-off from the site could be containable through the implementation of SUDS. **The site was included in the PSC but the overall site size was reduced from the previous allocation in the halted Publication Draft to 2.74ha from 4.16ha and the open space provision was increased and aligned to the south of the site with the development to the north. The PSC site was allocated for up to 104 dwellings The site is owned by JRHT and is proposed as an extension to the garden village. A substantial tree belt already exists to the eastern boundary to form a buffer between any new residential development and the green wedge to east. The tree belt and proposed openspace forms a natural continuation of greenspace**

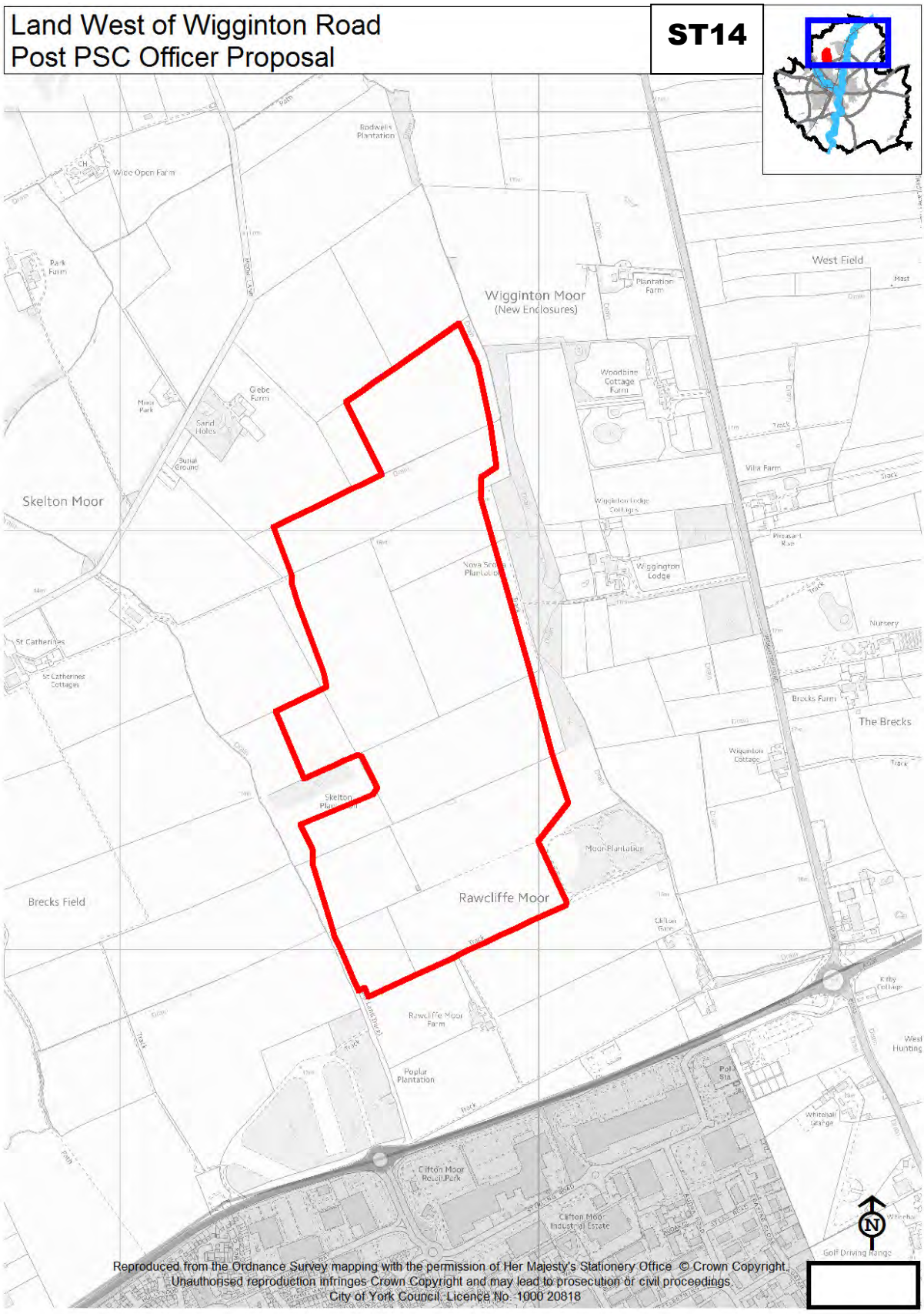
Allocation Reference	Site Name	Officer Commentary
H46 Cont...	Land North of Willow Bank and East of Haxby Road Continued....	**between the site and the River Foss and will link the site to the existing public footpath and cycleway. The proposals follow ecological advice to protect remnant species rich grassland and respond to concerns raised by YWT regarding the number of areas of high quality habitat and mature trees which are valuable for bats to the north of the site and therefore housing would be better located to the south of the site.** **Officers suggest that that the site could be extended to a total site area of 4.16ha and up to 118 dwellings. See map on page 91.**
H54	Whiteland Field, Haxby	**Total Representations: 275** **Support: 10** **Objections: 222** **Comments: 43** A small number of supports for the site were received for development on the site, where support was recorded, in general there is reference made to the suitability of the site for housing and that it is a well contained site. The developer/landowner confirms that the site is deliverable and viable. A significant level of objection was received. Key issues raised include: • impacts on local traffic congestion particularly on Usher Lane; • current congestion levels on the A1237 and in particular the Haxby/Strensall roundabout would be compounded by further development. A number of comments refer to the need to dual the outer ring road prior to any further development taking place; • Concern that existing public transport provision is unsatisfactory and could not provide for additional residents; • inadequate drainage and sewerage – that the new drainage would need to be installed before any development took place, that the current sewerage system is totally inadequate in the village, that the WWTW at Strensall is at or above capacity and that currently surface water flooding regularly causes the sewers to back up in heavy rain; • Many comments point to the need for development to be self sufficient in amenities/services, including the provision of a primary and secondary school and GP provision;

Allocation Reference	Site Name	Officer Commentary
H54 Cont...	Whiteland Field, Haxby Continued....	• Significant 'piecemeal' development has already taken place in Haxby which has already impacted upon the character of the area and the adequacy of the existing levels of community facilities; and • Site is crossed by two high voltage pylons which would be expensive to move or require a reduction in site area. Officers have considered the objections raised and in particular have looked in more detail at the issue regarding the high voltage power lines that cross the site. Advice from National Grid confirms that the site is crossed by the YR400kv route high transmission over head line. National Grid only support proposals for the relocation where such proposals directly facilitate major development or an infrastructure project of national importance. In this case the site is not a strategic site and is not large enough, at 1.3ha to be considered a major development so relocation of the line is unlikely to be supported by National Grid or indeed economically viable for the site developer/landowner. National Grid advice suggest that where lines cross a development site buildings must not be located directly beneath both for residential amenity and safety reasons and so that National Grid maintain access for maintenance. There are statutory clearances between overhead lines and the ground and built structure must not infringe this clearance. **On balance due to the small size of the site (1.3ha) and the fact that the site area would need to be reduced to both provide suitable clearance to the lines and to buffer the railway line to the east officers suggest that the site is removed as a housing allocation. See map on p 92.**
Former SF10	Land North of Riverside Gardens, Elvington	**Deleted Former Site SF10: Riverside Gardens, Elvington** **Total Representations: 2** **Supports: 0** **Objections: 2** **Comments: 0** Barratt and David Wilson Homes object to the deletion of former safeguarded land, and its rejection as a potential housing allocation. The site is deliverable and available now and is under the control of a national housebuilder. The site can be considered achievable as new homes can be delivered on the site within the next 5 years and within the first 5 years of the Local Plan. There are no

Allocation Reference	Site Name	Officer Commentary
Former SF10 Cont....	Land North of Riverside Gardens, Elvington Continued....	technical or environmental (built or natural) constraints which would preclude the development of the site. **The site was previously included as safeguarded land in the halted Publication Draft Local Plan. At that point the site passed the site selection criteria but further information was requested in order to demonstrate suitable access. Landscape impacts on the 4ha site were not considered to be a showstopper as the site is well contained, surrounded on two sides by existing residential and on the other two by mature hedgerows. The site is close to the village centre and can be accessed via Riverside Gardens. It is considered that visual impact on the wider landscape and setting of the village would be relatively limited.** **Officers suggest that that the site could be included with a total site area of 4.15 ha and up to 102 dwellings (70% @ 35dph). See map on page 93.**
New Site 878	Land at Victoria Farm, Rufforth	**New Site submitted through PSC** This is a new site submitted through the PSC. Site is 0.95 ha and could provide up to 32 dwellings. The site is currently used for grazing. The site passes the site selection criteria and there are no showstoppers identified through the technical officer assessment although the site does contain a Tree preservation order which could reduce the capacity of the site as the tree would need to be retained with adequate space for the canopy with any buildings set back. The site represents a small extension to the existing village envelope but is currently not supported as a potential housing site through the emerging Rufforth Neighbourhood Plan due to concerns about the TPO. **Officers suggest that that the site could be included with a total site area of 0.95 ha and up to 32 dwellings (95% @ 35dph). See map on page 94.**
New Site 879	Land at Maythorpe, Rufforth	**New Site submitted through PSC** This is a new site submitted through the PSC. Site is 0.67 ha and could provide up to 22 dwellings. The site is currently used for grazing. Site access would be via Maythorpe. The site passes the site selection criteria and there are no showstoppers identified through the technical officer assessment. The site represents a small extension to the existing village envelope and is supported as a potential housing site through the emerging Rufforth Neighbourhood Plan.

Allocation Reference	Site Name	Officer Commentary
		Officers suggest that that the site could be included with a total site area of 0.67 ha and up to 22 dwellings (95% @ 35dph). See map on page 95.
New Site 938	Former Clifton Without Primary School	**New Site** New site that was included in the report to Executive in March 2017 on the HCA Strategic Partnership as a residential site for 25 dwellings. Site passes the site selection criteria and there are no showstoppers identified through the technical officer assessment. Site boundary may need to be amended to provide land to Cannon Lee school for access arrangements. **Officers suggest that that the site could be included with a total site area of 0.71 ha and up to 25 dwellings. See map on page 96.**

Annex 3: Officers Assessment of Housing Sites following PSC


Land West of Wigginton Road
Post PSC Officer Proposal
ST14
Wigginton Moor
(New Enclosures)
West Field
Skelton Moor
Rawcliffe Moor
Brecks Field
The Brecks
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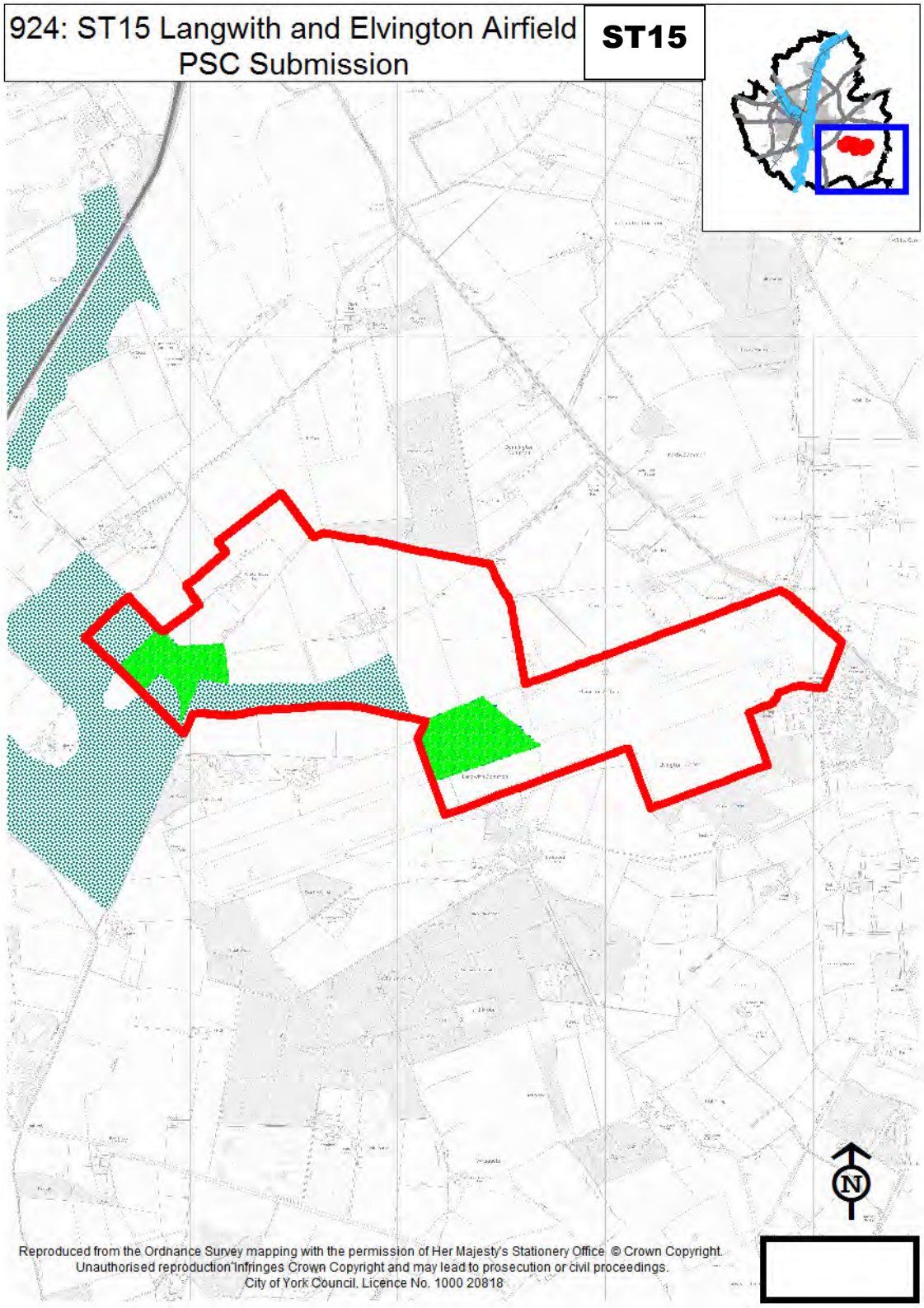
924: ST15 Langwith and Elvington Airfield
PSC Submission
ST15
N
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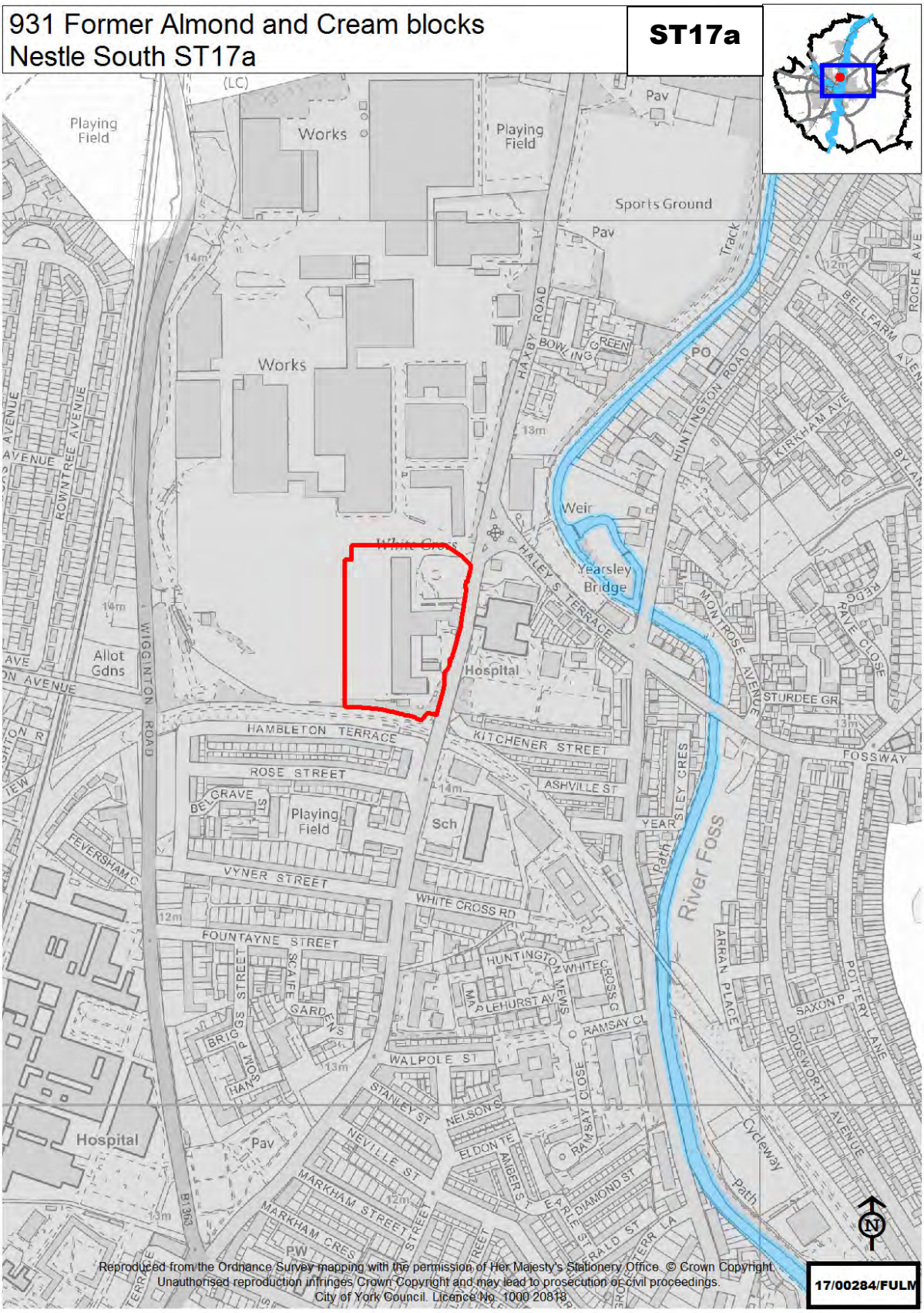
931 Former Almond and Cream blocks
Nestle South ST17a
ST17a
Playing Field
Works
Playing Field
Pav
Sports Ground
Track
Pav
Works
HAXBY ROAD
BOWLING GREEN
PO
HUNTINGTON ROAD
BELLFARM AVEN
ROCHE AVE
KIRKHAM AVE
Weir
Yearsley Bridge
HALEY'S TERRACE
MONTROSE AVENUE
REDCAR AVE CLOSE
STURDEE GR
FOSSWAY
ROWNTREE AVENUE
WIGGINTON ROAD
Allot Gdns
Hospital
HAMBLETON TERRACE
KITCHENER STREET
ROSE STREET
ASHVILLE ST
BEVERLEY GRAVE ST
Playing Field
Sch
YEARSLEY CRES
River Foss
FEVERSHAM CL
VYNER STREET
WHITE CROSS RD
FOUNTAYNE STREET
SCAFFOLD GARDENS
BRIGGS STREET
HANSOM PL
HUNTINGTON MEWS
WHITECROSS CL
MAPLEHURST AV
RAMSAY CL
WALPOLE ST
ARRAN PLACE
SAXON PL
POTTERY LANE
DODSWORTH AVENUE
STANLEY ST
NELSON ST
RAMSAY CLOSE
ELDON TE
AMBER ST
NEVILLE ST
MARKHAM STREET
MARKHAM CRES
DIAMOND ST
Cycleway
Path
Hospital
Pav
PW
B1363
N
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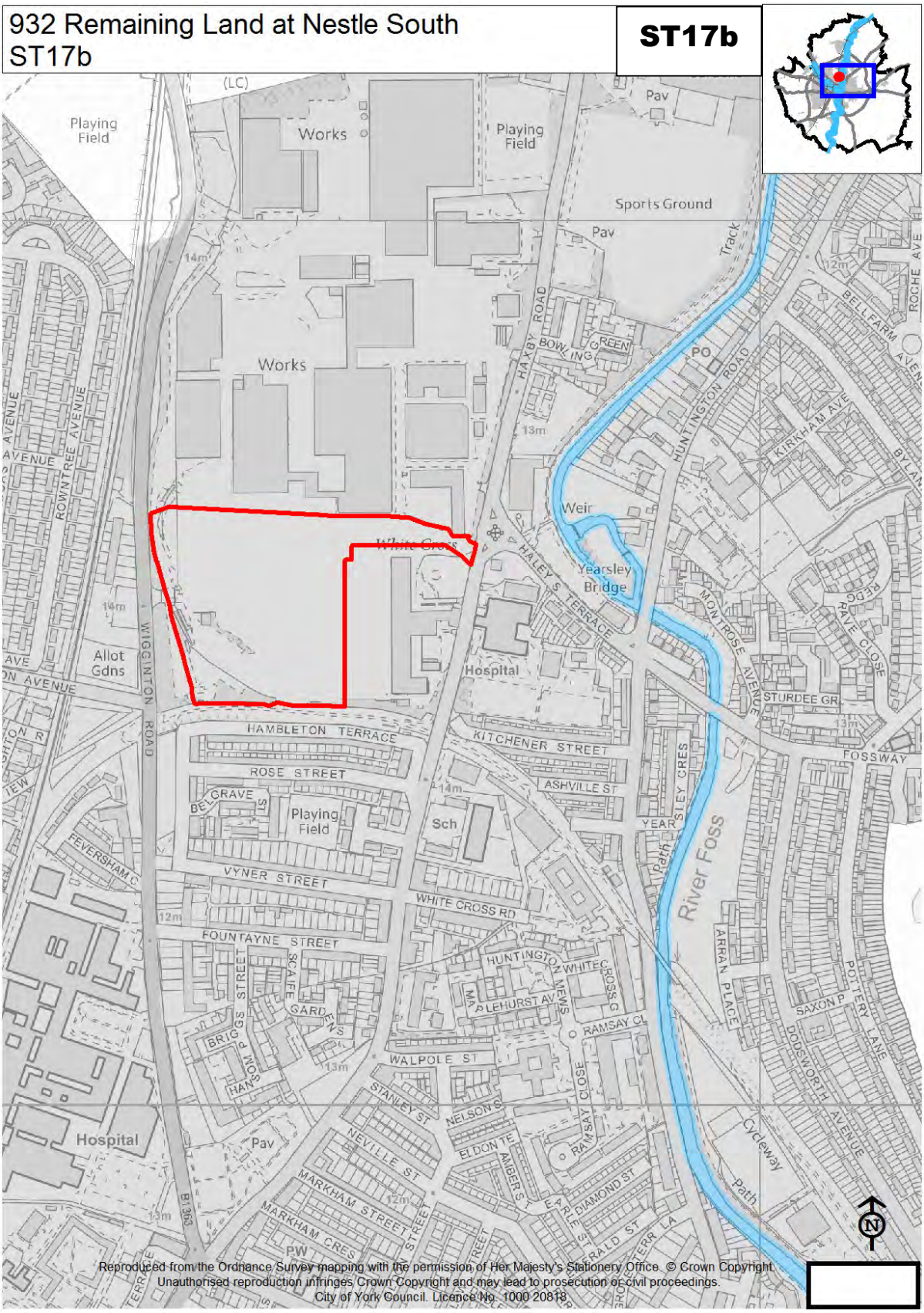
17/00284/FULM

932 Remaining Land at Nestle South
ST17b

ST17b



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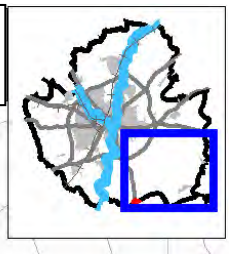
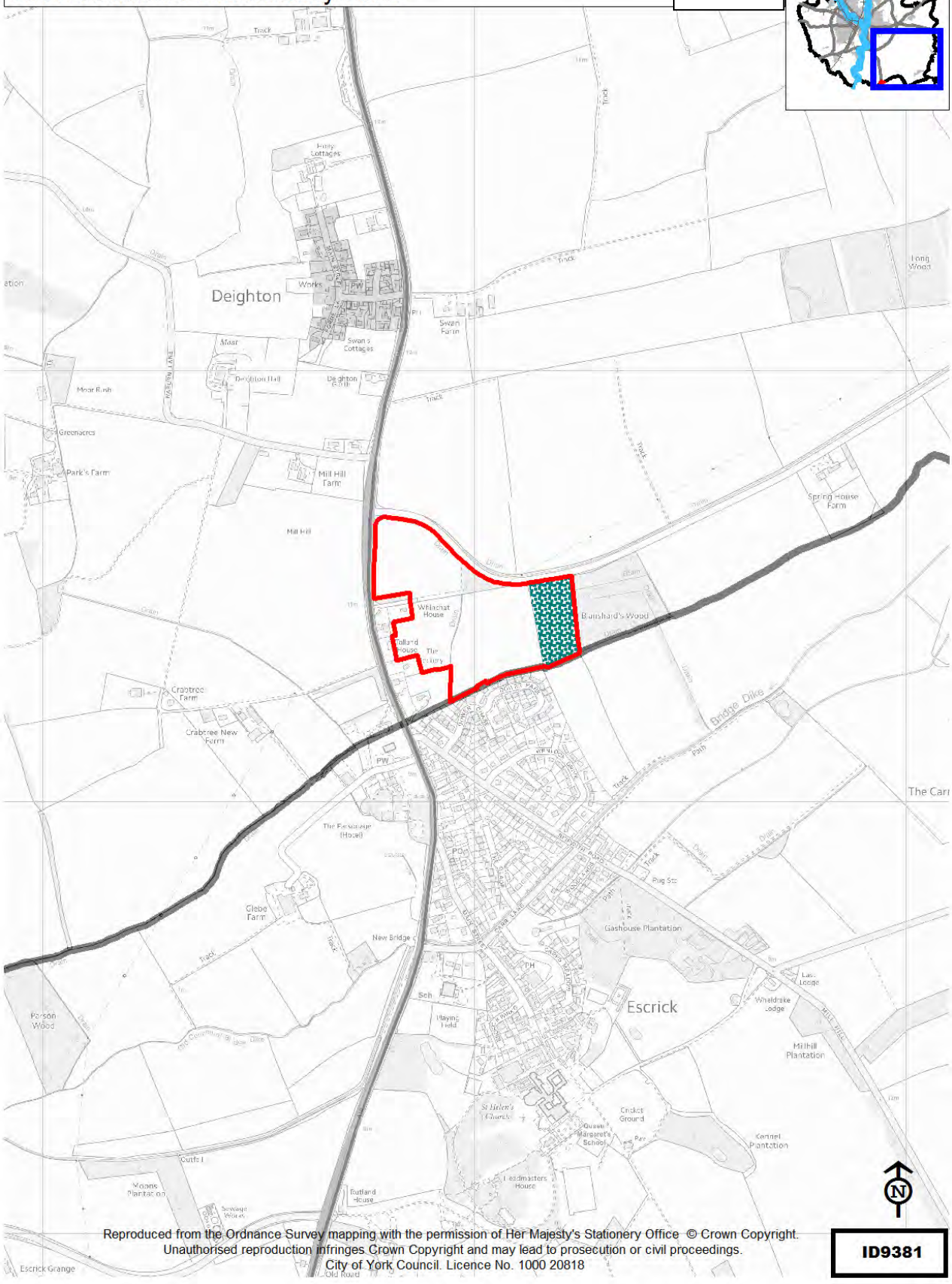
881 Land to the North of Escrick
with additional Biodiversity Area

SF15





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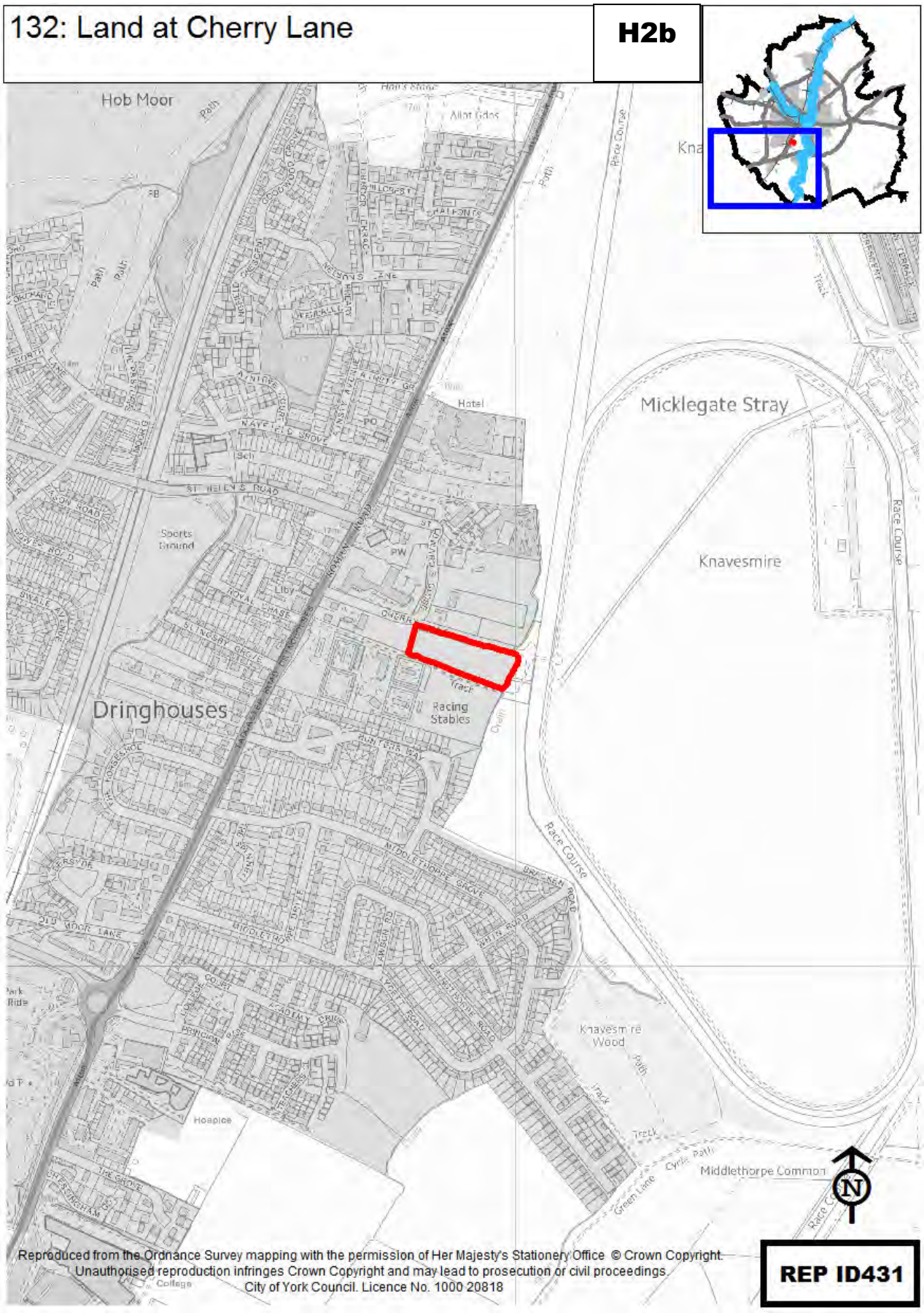
ID9381


132: Land at Cherry Lane
H2b
Hob Moor
Micklegate Stray
Knavesmire
Dringhouses
Racing Stables
Sports Ground
Hospice
Knavesmire Wood
Middlethorpe Common
Race Course
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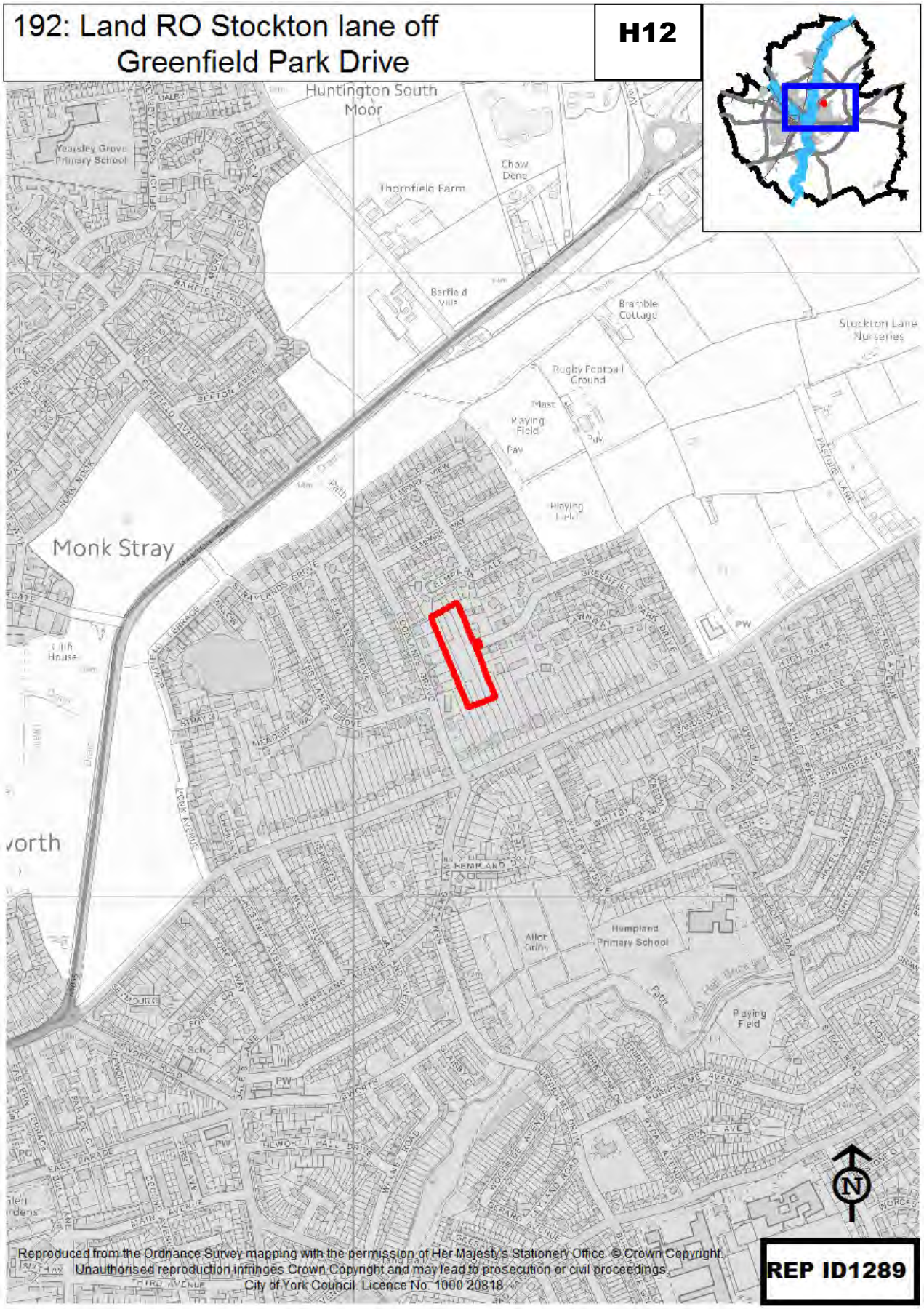
192: Land RO Stockton lane off Greenfield Park Drive
H12
Huntington South Moor
Yearsley Grove Primary School
Thornfield Farm
Chaw Dene
Barfield Villa
Bramble Cottage
Stockton Lane Nurseries
Rugby Football Ground
Mast
Playing Field
Monk Stray
Humpland Primary School
Allot Gdns
Paying Field
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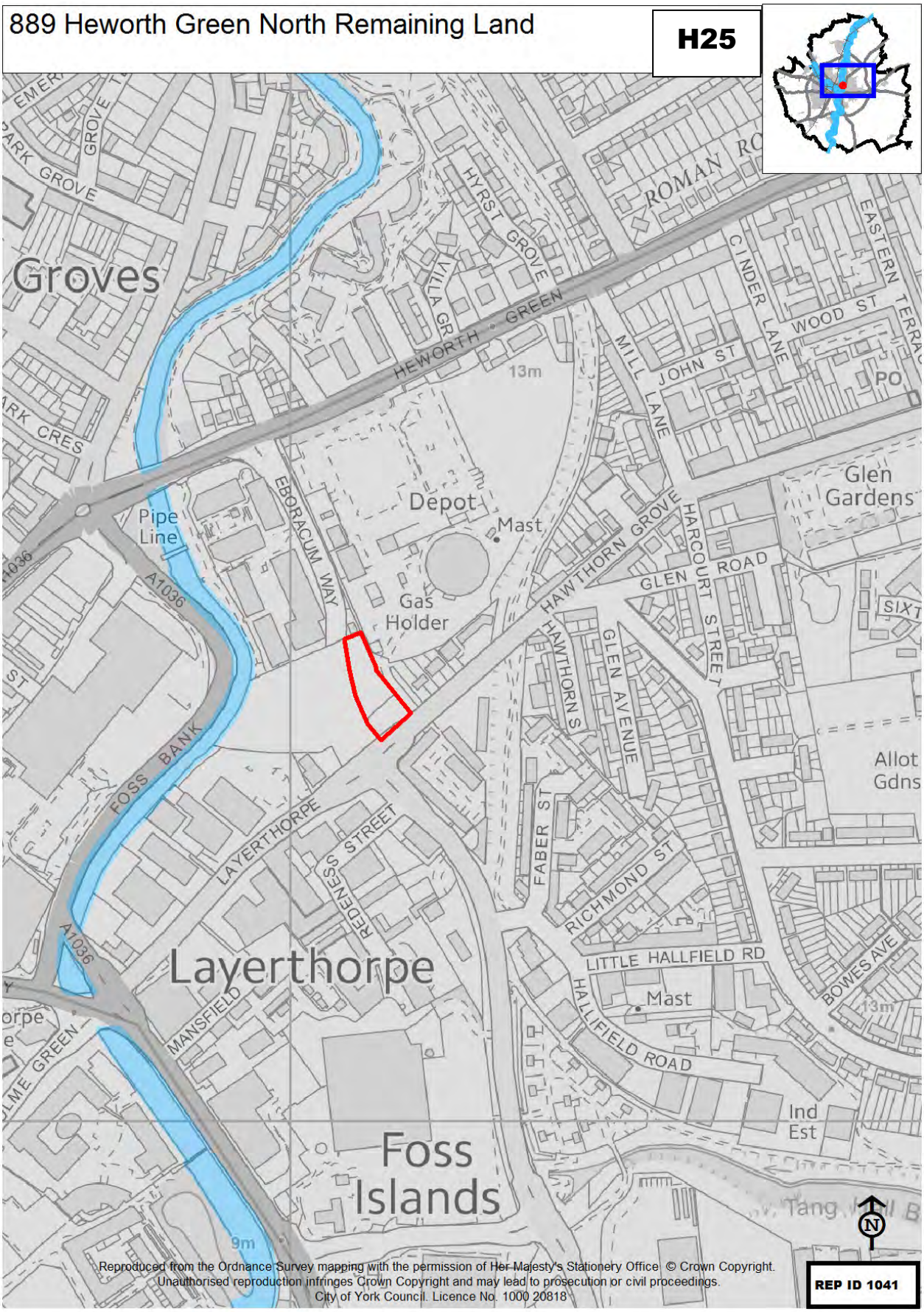
REP ID1289

98: Grove House

H23

REP ID 13171


889 Heworth Green North Remaining Land
H25
Groves
HEWORTH GREEN
13m
Depot
Mast
Gas Holder
Pipe Line
EBORACUM WAY
A1036
HAWTHORN GROVE
HARCOURT STREET
GLEN ROAD
Glen Gardens
CINDER LANE
WOOD ST
JOHN ST
MILL LANE
HYRST GROVE
ROMAN RD
EASTERN TERR
PO
FOSS BANK
LAYERTHORPE
REDNESS STREET
FABER ST
GLEN AVENUE
HAWTHORN S
RICHMOND ST
LITTLE HALLFIELD RD
HALLFIELD ROAD
BOWES AVE
Allot Gdns
Ind Est
Layerthorpe
MANSFIELD
Foss Islands
9m
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REP ID 1041

926: Land to north of North Lane, Wheldrake

H28

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6: Land adjacent to Greystone Court

H37

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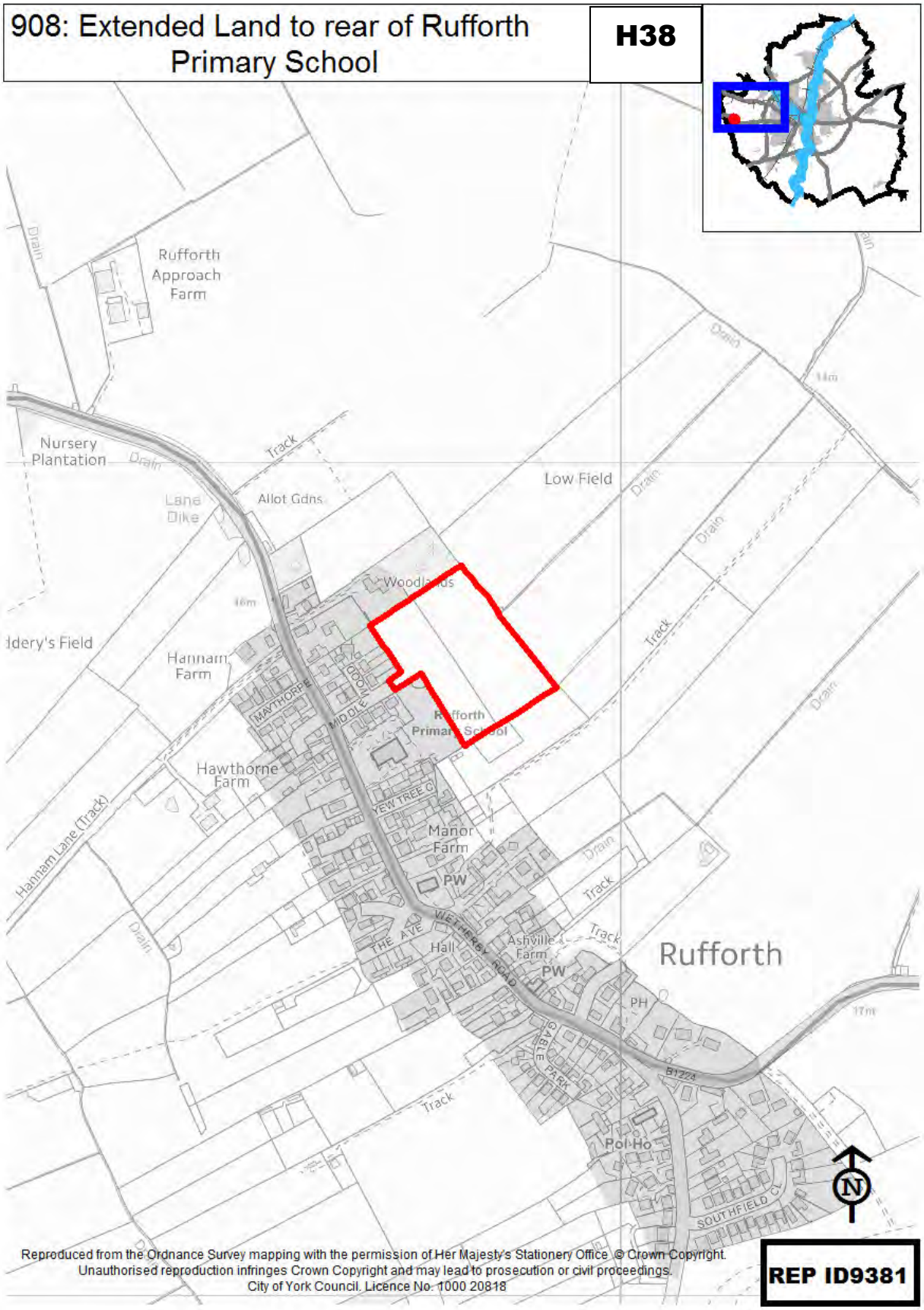
908: Extended Land to rear of Rufforth Primary School
H38
Rufforth Approach Farm
Nursery Plantation
Drain
Track
Lane Dike
Allot Gdns
Low Field
Hannam Farm
MAYTHORPE
MIDDLE
Rufforth Primary School
Hawthorne Farm
YEW TREE C
Manor Farm
PW
Hannam Lane (Track)
THE AVE
WETHERBY ROAD
Hall
Ashville Farm
Rufforth
PH
GABLE PARK
B1224
Pol Ho
SOUTHFIELD CL
N
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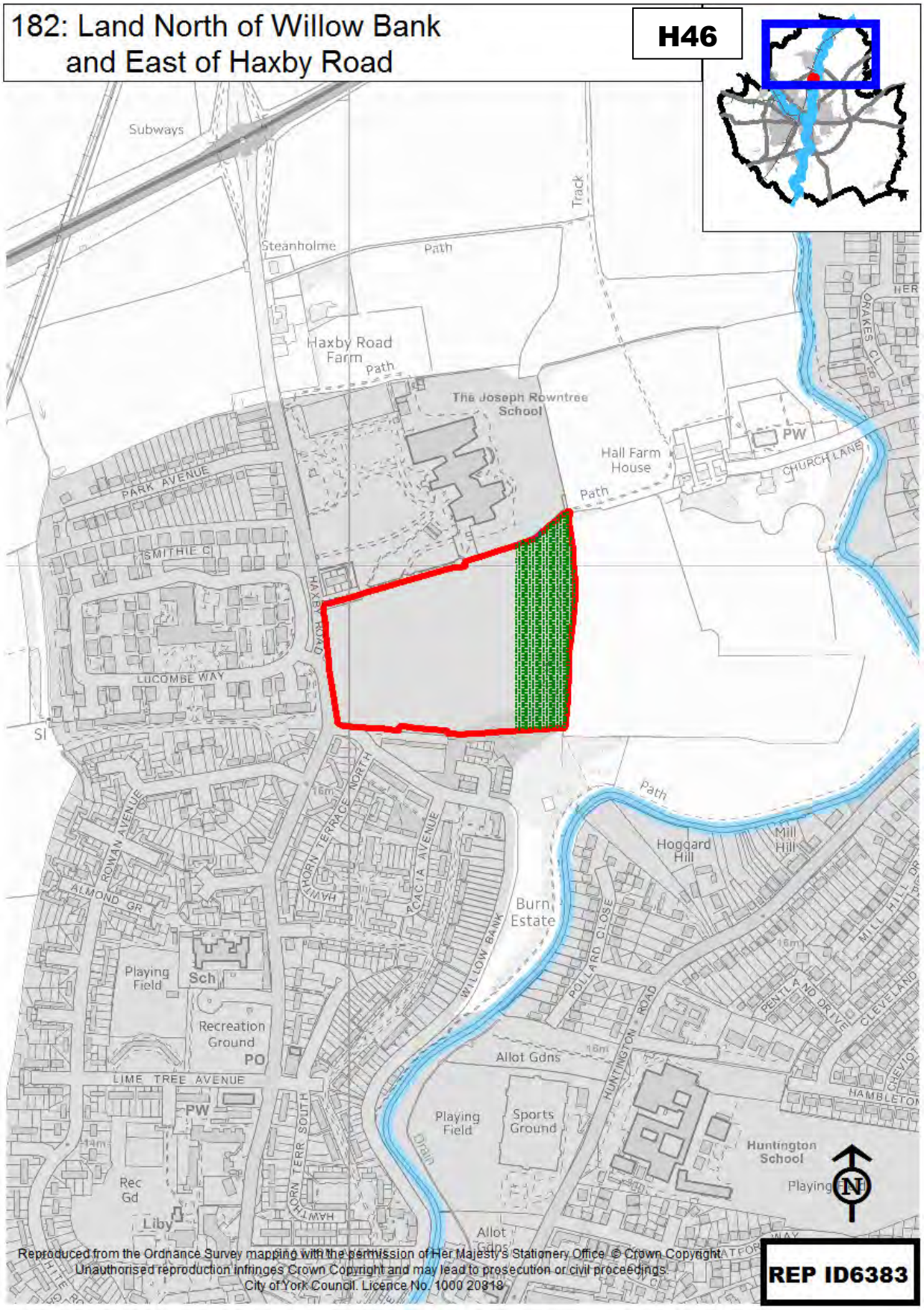
REP ID9381



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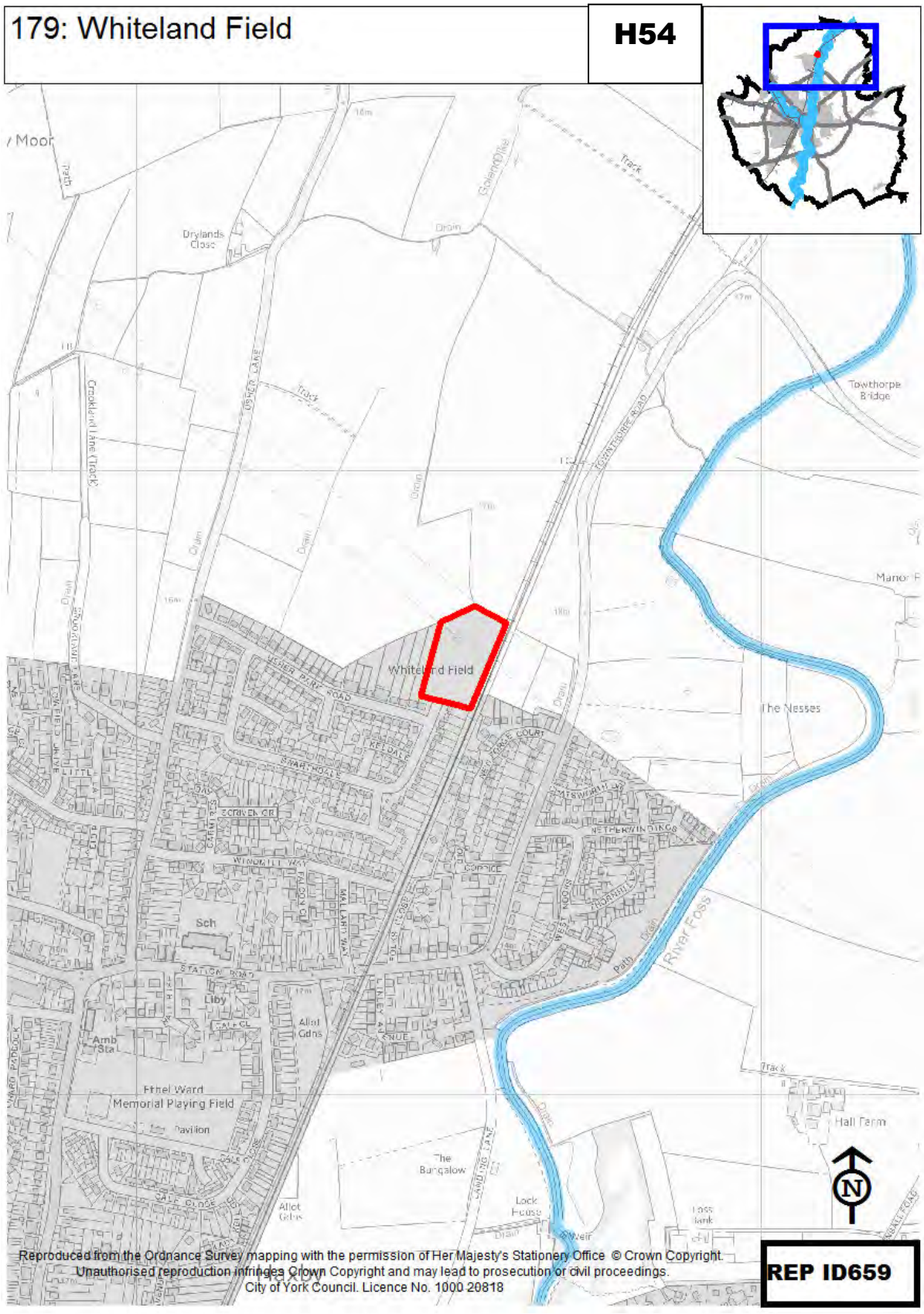
179: Whiteland Field
H54
Whiteland Field
Towthorpe Bridge
The Nesses
River Foss
Ethel Ward Memorial Playing Field
Pavilion
Hall Farm
The Bungalow
Lock House
Weir
Sch
Liby
Amb Sta
Allot Gdns
Drylands Close
Crockeland Lane (Track)
Osbaldwick Beck
Foss Bank
N
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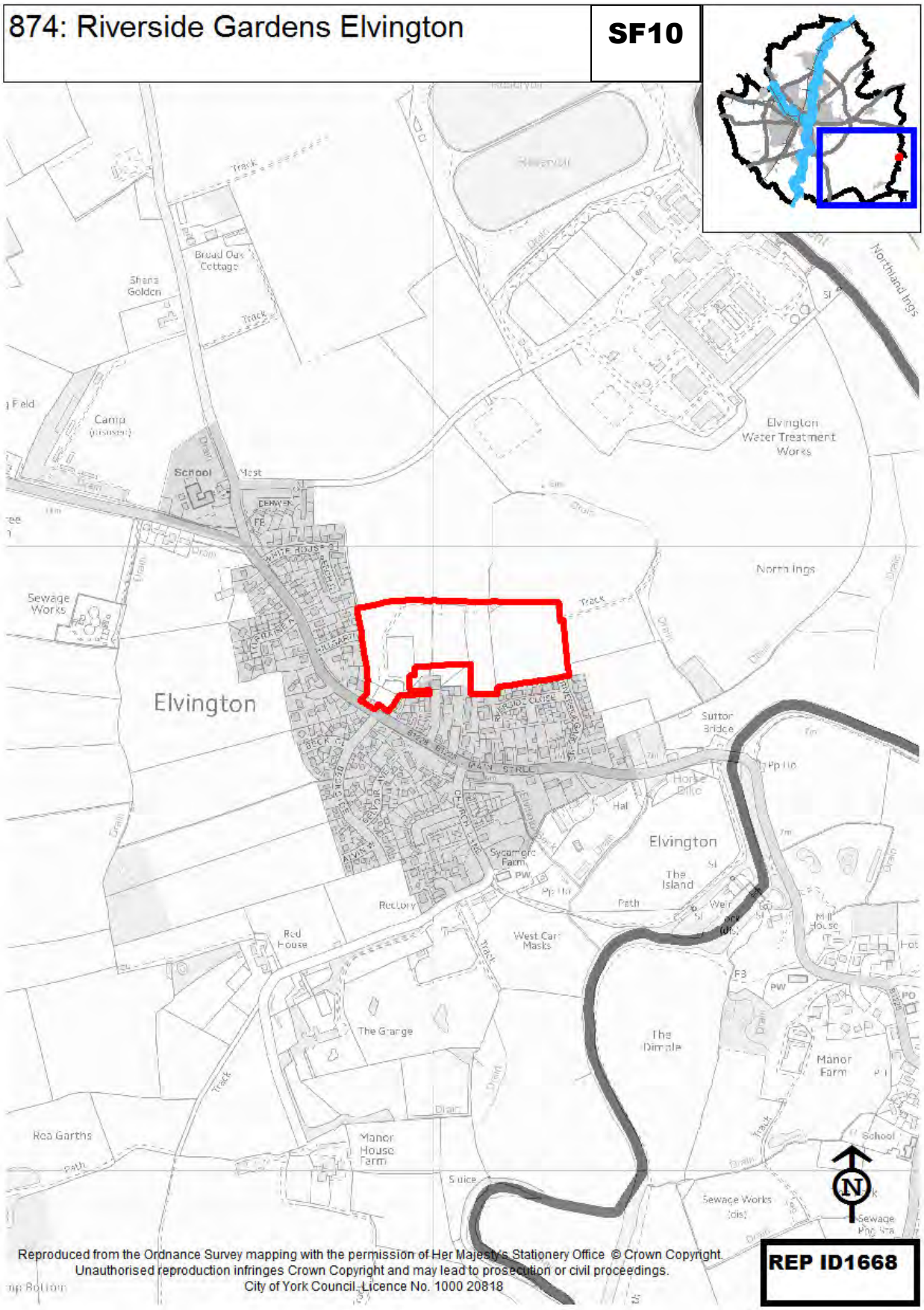
874: Riverside Gardens Elvington
SF10
Broad Oak Cottage
Shiela Golden
Track
Camp (prisoner)
School
Elvington
Water Treatment Works
Northland Ings
North Ings
Sewage Works
Elvington
Sutton Bridge
Horse Bridge
Sycamore Farm
The Island
Rectory
Path
Red House
West Carr Masks
The Grange
The Dimple
Manor Farm
Red Garths
Manor House Farm
Sluice
Sewage Works
N
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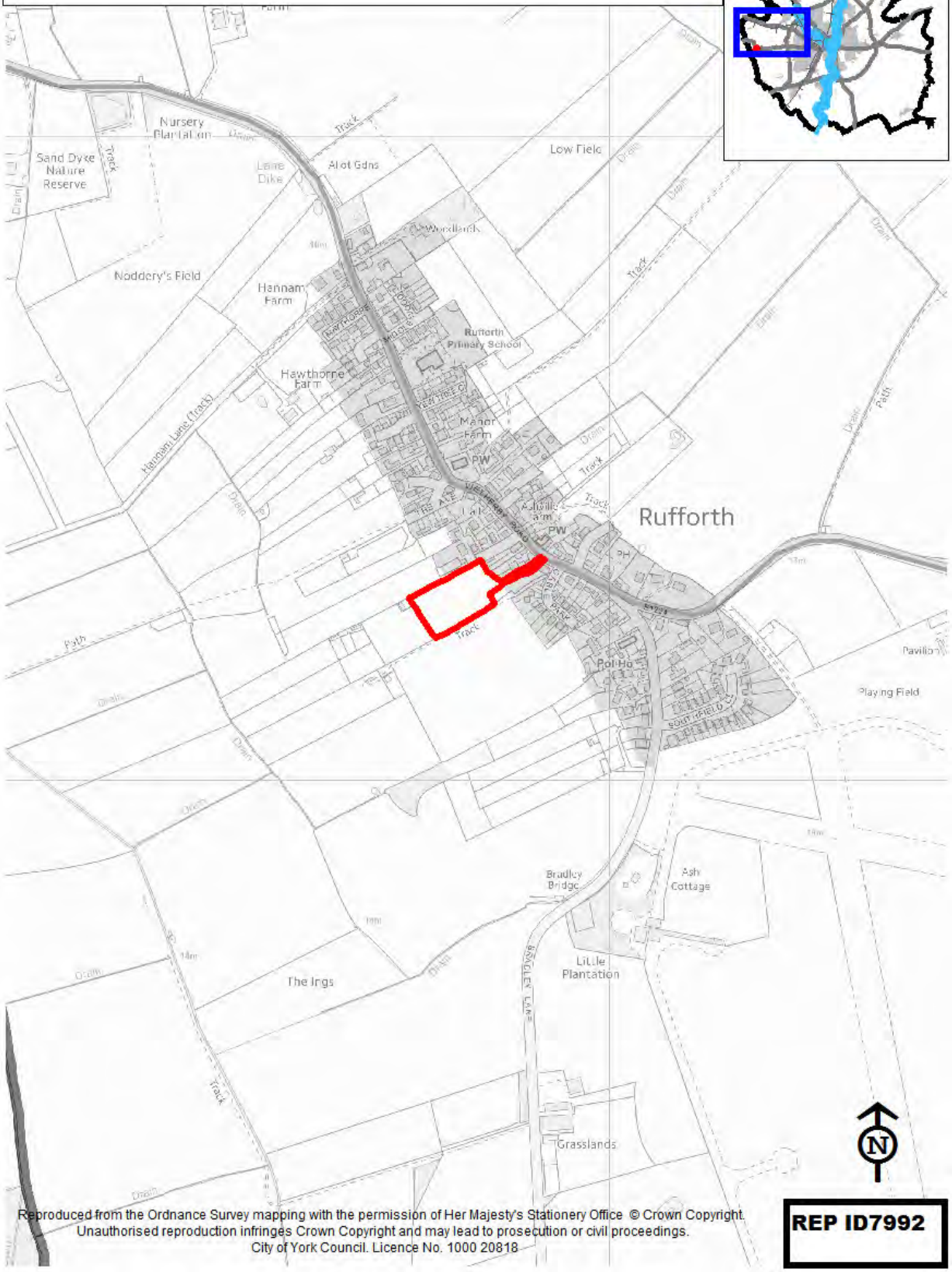
REP ID1668

878: Land at Victoria Farm Close Ruffoth



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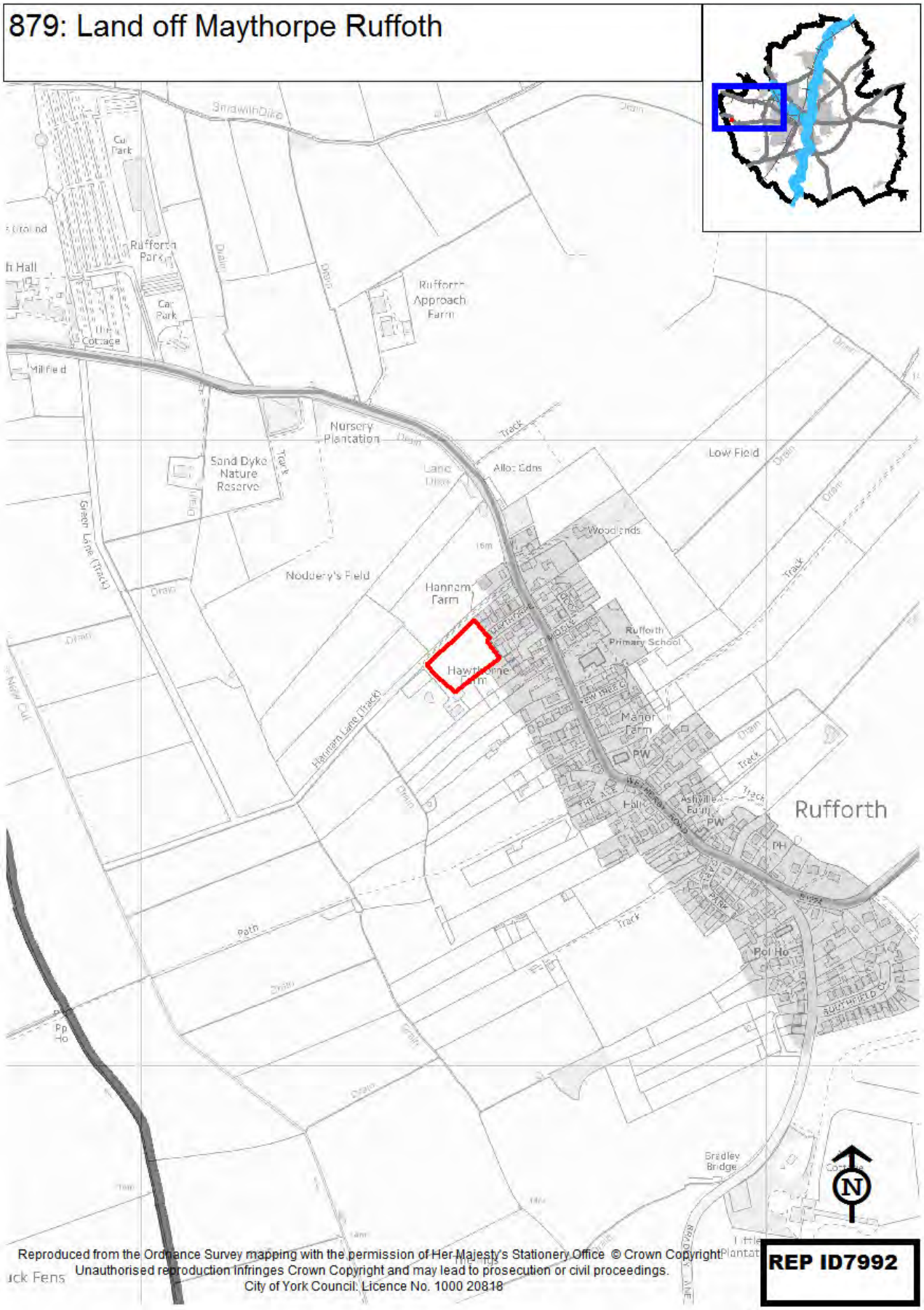
REP ID7992



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938: Former Clifton Without Primary School

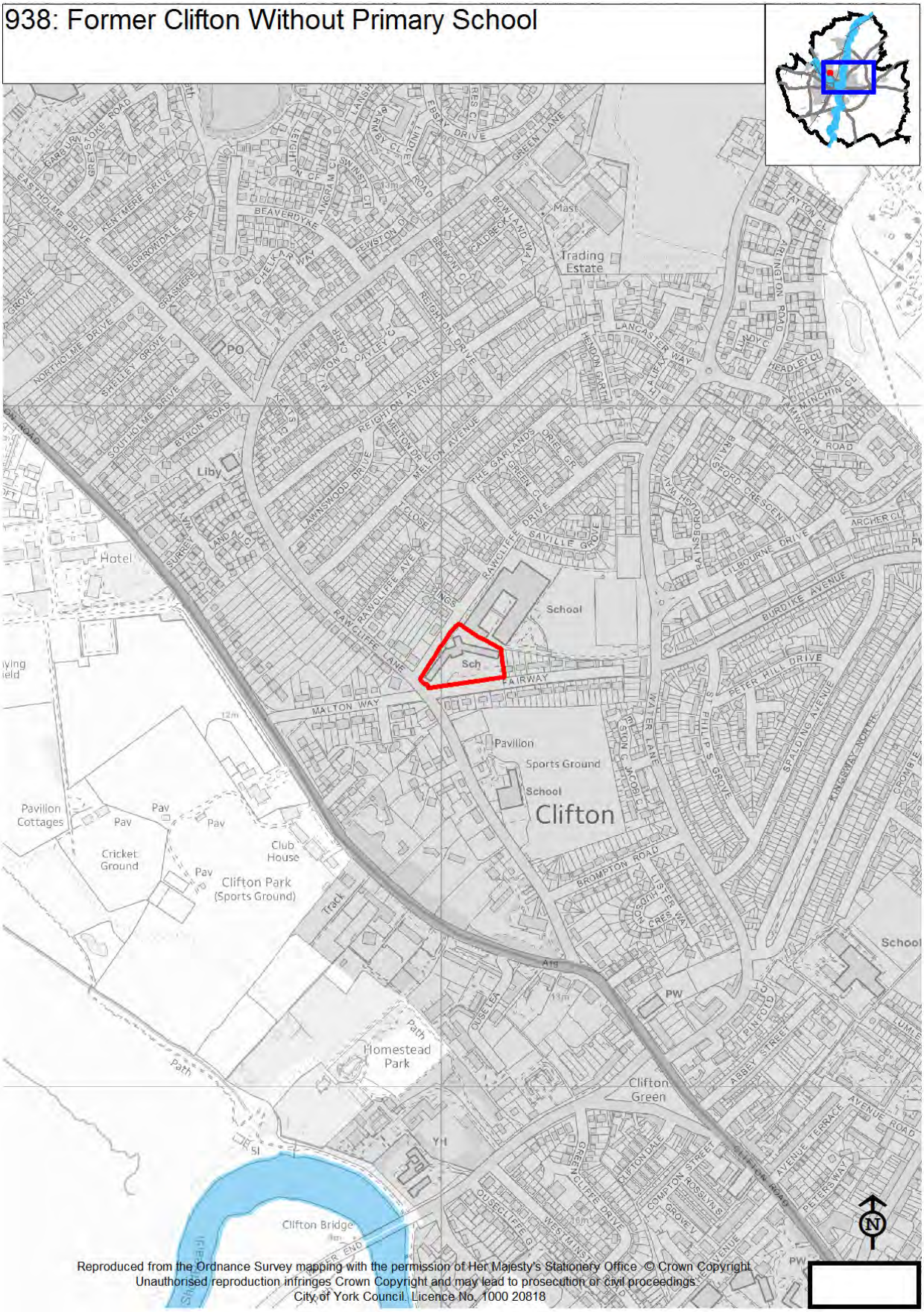

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Table 4 – Officer assessment of technical evidence where addition of sites or boundary changes not accepted

Allocation Ref	Site Name	New Site/Previously Rejected Site
Strategic Sites		
Former ST11	New Lane, Huntington	**Deleted Site ST11:** **Total Representations: 6** **Supports: 2** **Objections: 3** **Comments: 1** Support for the removal of site on the grounds of its potential impact on congestion on surrounding roads, loss of visual amenity and parking. General comments regarding the strain put on the area by recent developments including the stadium. Objection to deletion of site from Paul Butler Planning OBO Barratt and David Wilson Homes who have option on land to north of cemetery**.** They argue that this is one of most sustainable sites, has strong defensible boundaries, no technical constraints, is deliverable and submit a revised masterplan to address concerns re setting of Scheduled Ancient Monument (SAM), creation of public openspace (3.67ha) and frontage to New Lane. Site could offer potential for circa 250 housing units and associated infrastructure improvements. Persimmon Homes (land to the south of the cemetery) object to the site's removal from the Plan, noting that it is located in a very sustainable location close to local facilities including substantial employment, as well as park and ride. Officers did not include the site in the PSC (2016) as it is considered that the site has an important

Allocation Ref	Site Name	New Site/Previously Rejected Site
Former ST11 Cont...	New Lane, Huntington Continued...	role in preserving character and setting of Huntington and provides an important gap between existing residential area of Huntington and the commercial area of Monks Cross. The site also contains SAM – Roman Camp which requires an adequate setting. Site discussed at Technical Officer workshop including the revised masterplan submitted for the land to the north of the cemetery (Barratt and David Wilson Homes). It is considered that the site does offer important relief in what is a dense area of Huntington and has important local amenity value. The revised masterplan does not respond adequately to setting of SAM or the creation of valuable openspace. Officers consider that the site to the south of cemetery should be retained as part of green wedge into Huntington. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 140 .**
Former ST12	Manor Heath, Copmanthorpe	**<u>Deleted Site ST12</u>** **Total Representations: 49** **Supports: 43** **Objections: 3** **Comments: 3** A significant number of responses support the proposed deletion of this site. Commonly these refer to the level of development proposed bringing about an unwelcome change to the character of the village and that Copmanthorpe's services/amenities would be overburdened by additional demand. David Wilson Homes and Linden Homes both object to the deletion of ST12, stating that the site serves little or no green belt purpose and had previously satisfied CYC's site assessment as it was included as a potential allocation at 'Further Sites' stage (site ref 872). They further state that the site is in a highly sustainable location, and there are no technical or environmental constraints that

Allocation Ref	Site Name	New Site/Previously Rejected Site
Former ST12 Cont....	Manor Heath, Copmanthorpe Continued....	would preclude the development of the site. Landowner and developer interest is confirmed. Homes can be delivered on site in the next 5 years, indeed within the first 5 years of the Plan. DWH query why ST31(Land south of Tadcaster Road, Copmanthorpe) has been included as a preferred development site when there are outstanding constraints on delivery, and suggest that ST12 is allocated as a suitable, viable and achievable additional or alternative development site. Site discussed at Technical Officer workshop including the revised masterplans submitted (Barratt and David Wilson Homes to the North and Linden Homes to the South). Site was removed from PSC due to lack of containment, sense of openness and intrusion into open countryside and impact on the rural edge of Copmanthorpe village. The revised masterplans offered an increased belt of buffer planting along western and southern edges as well as landscaped openspaces incl. allotments to create a transition between urban edge and green belt. As part of the land is also owned by Askham Bryan College delivery of site would allow them to continue to invest in York with new technology and capital/estate improvements. Whilst there was some support for the reduced site boundary and extensive buffering offering an element of transition a defined green belt boundary would still have to be artificially created in this location and would not be as robust as the existing boundary currently offered by Manor Heath Road to the east of the proposed site. The roman road which runs through the site is still a gateway to the open countryside and building up on either side of this would be a significant intrusion into the open countryside. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 141.**

Allocation Ref	Site Name	New Site/Previously Rejected Site
Former ST13	Moor Lane, Copmanthorpe	**<u>Deleted Site ST13</u>** **Total Representations: 44** **Supports: 40** **Objections: 3** **Comments: 1** A significant number of responses, support the deletion of this site. Commonly these refer to the level of development proposed bringing about an unwelcome change to the character of the village and that Copmanthorpe's services/amenities would be overburdened by additional demand. Those who support the removal of ST13 from the preferred list of sites generally also support the proposed allocations for Copmanthorpe set out in the Preferred Sites document. Shepherd Group Properties strongly objects to the deletion of ST13, submitting evidence base to respond to the Council's concerns – they argue that this shows the site is suitable, available and viable. Site can be accessed safely - concerns regarding access not previously raised as a showstopper. Consider PSC conclusion is unfounded. ST13 is visually and physically well related to the urban area and development would not have an adverse impact on open countryside. Submitted Transport Assessment and Travel Plan and detailed access drawings. Layout amended removing vehicular access to Barnfield Way and retaining for pedestrian and cycle access only. Access shown to Moor Lane – access drawings shows new priority junction on Moor Lane, south of cemetery at required width (5.5.m) plus footways. Road would need to be widened and land is part of public highway. Technical officer workshop – access is only constraint, mitigation required but not considered a showstopper to development. The evidence submitted through the PSC from the landowner/developer confirms that from a technical perspective the site could be accessed with the required mitigation including widening Moor Lane and is not a showstopper to development. Officers consider however, that there would still be adverse impacts when looked at cumulatively with site H29. On balance it is considered that site H29 would be preferable to site ST13 given it is smaller in scale and would require less mitigation. In addition the development of Site ST13 would extend the

Allocation Ref	Site Name	New Site/Previously Rejected Site
Former ST13 Cont....	Moor Lane, Copmanthorpe Continued....	built edge of Copmanthorpe to the west into open countryside. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 142**
Former ST29	Land at Boroughbridge Road	**Deleted Site ST29** **Total Representations: 14** **Supports: 13** **Objections: 1** **Comments: 0** Amongst others, Nether Poppleton Parish Council, Upper Poppleton Parish Council, Rufforth and Knapton Parish Council, Rufforth and Knapton Neighbourhood Planning Group, and York (Trenchard) Residents Company Ltd support the removal of the site on the grounds of: its role in preserving the historic character and setting of York and neighbouring villages; potential loss of green belt land; potential loss of agricultural land (Grade 2); impact of additional traffic on A59, noting cumulative impact with ST1 and ST2. Site is also stated to be within EA Groundwater Protection Zone 1. Landowners/developers state that the site should be reinstated as a housing allocation since it is not subject to environmental/amenity constraints and does not contribute to green belt purposes. Site does not have technical constraints, has limited ecological importance, masterplan retains existing hedgerows and trees and improves frontage to A59. Scope for access improvements to Boroughbridge road frontage and pedestrian access through Sherwood Grove to Beckfield Lane. Site was removed from PSC due to greenbelt/setting concerns. Views over open countryside as travelling from York towards A59. Site is partially contained but open fields to southern boundary. Site has a role in separating the urban edge of York from Poppleton and preventing coalescence which has already been compromised by Manor School, new A59 roundabout and PFS development. Site discussed at technical officer workshop – concerns remain over impact of site on setting of city

Allocation Ref	Site Name	New Site/Previously Rejected Site
Former ST29 Cont....	Land at Boroughbridge Road Continued....	and coalescence between York main urban area and Poppleton. Also perception of openness, views of open countryside as you travel out of York. Agree that existing Manor School and extended roundabout have already compromised the area to a certain extent but that the development of this site would fill in the gap entirely. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 143.**
Former ST30	Land north of Stockton Lane	**Deleted Site ST30** **Total Representations: 10** **Supports: 4** **Objections: 5** **Comments: 1** Support for the site's proposed de-allocation, including from Heworth Without Parish Council, acknowledges the site's draft green belt status and the important role of this 'green wedge' in preserving the historic character and setting of York. Concerns around impact of development on infrastructure are also noted. Representation received from landowner/developer who consider the site should be allocated for housing development; it is available, suitable and achievable and serves no or limited green belt purpose. Quote advice from previous GB Inspector (1995) - 'Character of site viewed from north to south with north more closely aligned to green wedge, Monk Stray and open countryside but south influenced by urban development to Stockton Lane', 'when viewed from Stockton Lane the character of the site is influenced by existing residential properties to Greenfield Park Drive, the church and dwellings. Largely urbanised and not part of wider countryside or greenwedge'. Only northern boundary is open as eastern boundary is contained by Pasture Lane. Represents 'infill' development. Site removed from PSC due to green belt concerns. Site is considered to play an important role in maintaining green wedge into York from Monk Stray. The site is not contained to northern boundary

Allocation Ref	Site Name	New Site/Previously Rejected Site
Former ST30 Cont...	Land north of Stockton Lane Continued.....	and eastern boundary (Pasture Lane) is a rural track/lane with dispersed intermittent buildings and is not considered to provide containment to the site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page144.**
Former ST10/ SF12 Site 880	Land at Moor Lane, Woodthorpe	Representation received from HOW Planning OBO Barwood Strategic Land promoting 104ha site with up to 1250 dwellings. Technical evidence submitted including: OAN, Delivery Statement/Masterplan, Water Technical Note, Transport Technical Note, Ecology Technical Note, Heritage Technical Note and Landscape Technical Note. Site is a sustainable urban extension with strong physical defensible boundaries. Comprehensive engagement with NE and YWT. 15 months of hydrological modelling and monitoring. Extensive ecological survey work incl. Phase 1 and 2 habitat survey, aquatic invertebrate survey, Arboriculture Survey, LVIA, ALC and Soils baseline assessment and Archaeological assessments incl geophysical survey and trial trenching. This is a previously considered site with a smaller 17ha site being included as a potential allocation in the 2013 Preferred Options Local Plan and then subsequently included as potential safeguarded land at Publication Draft (2014) due to concerns over the technical information required, particularly with regards to ecological and hydrological mitigation and the potential impact on Askham Bogg SSSI. The site was then removed at PSC. The larger site has always been rejected as part of the site selection process as it falls within a historic character and setting area – area protecting the rural setting and therefore fails criteria 1 of the site selection methodology. Whilst it is acknowledged that both the previously considered smaller 17ha site and the newly promoted 104ha site are controlled by a willing landowner, and the smaller site extent meets the first stages of the site selection methodology the potential for ecological impact on the adjacent Askham Bog SSSI, and potential implications of any mitigation approach on site viability and deliverability are still uncertain. The severity and complexity of these issues is likely to be increased for the larger site extent, due to closer proximity to the SSSI and larger quanta of development.

Allocation Ref	Site Name	New Site/Previously Rejected Site
		In addition, there are key and fundamental landscape and greenbelt/ heritage impact concerns relating to the larger proposed site allocation. The further ecological technical report submitted through the PSC consultation have been considered by officers and do not provide significant data. Their conclusion about the hydrological connectivity has not changed (i.e. the SSSI is principally rain-fed not surface water fed); it is stated that 12 months hydrological monitoring has been undertaken although the data has not been presented. One of the key points is the uncertainty around the effectiveness of the proposed mitigation - there are no proposals to demonstrate how the level in the buffer 'lake' would be maintained or how issues such as sustaining acceptable nutrient concentrations in this water would be addressed. Concerns that any lowering of the water levels in Holgate Beck would lead to increased drainage form the Bog and so lowering of the water table there have not been addressed in any detail, only stating that the flow regime could be controlled. There is no detail to the water management strategy. There are still concerns that the proposed buffer zone is too narrow, with some research indicating that 300-400m would be needed to be an effective barrier to impacts such as predation by domestic cats. The fundamental landscape impact concerns remain and the majority of the larger site falls within an area designated within the Historic character and setting area – area protecting rural setting and the Heritage Impact Assessment undertaken to date identifies the potential for serious harm to heritage characteristics. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 145 .**

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 122	Windsor House EPH	Site is under Local Plan allocation threshold of 0.2ha (site is 0.18ha). If site comes forward through the planning application process it would be considered as a small site windfall. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 146.**
Site 165	Westfields, Wigginton	Previously rejected site. Representation received from Persimmon Homes. Object to site not being included in PSC. Disagree with reasons for rejection and consider that the site will provide a natural extension to Wigginton and has clear defined boundaries. New masterplan submitted with access from Westfield Lane and Walmer Carr. This site is entirely within an Extended Green Wedge (D1) and therefore fails criteria 1 of the site selection paper methodology (environmental constraints). No technical evidence has been submitted through the PSC to articulate why this area should not form part of the extended green wedge. No change to previous position. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 147.**
Site 170	Ponds Field, Heslington	Previously rejected site. Representation received from Persimmon Homes. Object to site not being included in PSC. Disagree with reasons for rejection as do not consider that the site will compromise setting of Heslington Village, coalescence between Heslington with Badger Hill or damage the Green Infrastructure corridor. New masterplan submitted with revised access from Windmill Lane rather than Field Lane. Officers have further considered the revised masterplan submitted through the PSC. The *Proposed public open space* does not tally with the *Potential open space* shown on the *Site analysis*. The latter shows a width of open space alongside Windmill Lane that relates to the *Existing vegetation* within the eastern campus. In any case, this does not retain a meaningful separation – physically or

Allocation Ref	Site Name	New Site/Previously Rejected Site
		visually, between Badger Hill and Heslington village. Whilst the revised site access – on Windmill Lane – results in a reduced impact on Field Lane, the imposing *Proposed Residential parcels* in effect fill this remaining critical gap. It is considered that the critical gap provided by Pond Fields also strongly relates to the campus master plan which deliberately leaves the western portion of the campus free of built development, i.e. Pond Fields reflects the openness that is provided on the opposite side of the road, thus the two act both individually and in partnership to reinforce the open setting of Heslington university/Heslington village. The proposed design provides an open space off Windmill Lane – most of which is natural amenity space created around the exiting pond and vegetation. The need for sustainable drainage may further reduce the available open space. The *buffer planting,* which would provide a limited amount of seasonal screening, would not mitigate the loss of undeveloped land between Badger Hill and Heslington **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 148.**
Site 171	Lime Tree Farm, Common Lane, Heslington	This site boundary has been previously considered through earlier iteration of the site selection process. The representation received from Persimmon homes objects to the earlier technical officer comments but does not provide any further detailed evidence to overcome the issues presented. The majority of the area is designated open space (4.36ha of it is natural/semi natural) and it therefore fails criteria 2 of the site selection methodology (existing open space). The remaining available land which is not designated as open space is 0.78ha and the majority of this already contains existing built structures. No technical evidence has been submitted which the council accepts which would change the designation of this land from openspace.

Allocation Ref	Site Name	New Site/Previously Rejected Site
	Lime Tree Farm, Common Lane, Heslington	No further landscape assessment submitted to substantiate comments made. These fields are part of the setting of the original village of Heslington and help to define its character and boundaries as well as adding to the enjoyment of the Public Right of Way (PROW). **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 149.**
Site 220	Land at Lowfield Lane, Knapton	Previously rejected site. Representation received from planning agent OBO landowner. Site resubmitted for residential and confirmation that site is considered to be suitable and deliverable. No additional technical evidence submitted as part of the representation. Site is isolated and does not have sustainable access to services or public transport. Development of the site would compromise the setting of York and of Knapton village consisting of a significant intrusion into open countryside. Not considered a suitable site for residential development. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 150.**
Site 755	Land East of Strensall Road	Previously rejected site. Representation received from planning agent OBO landowners. Object to site not being included in PSC. Site is considered to be a sustainable extension to Earswick village. No additional technical evidence submitted as part of the representation. Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as a residential site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 151.**
Site 768	Land to the West of Moor	Previously rejected site. Representation from planning agent OBO landowner. Re-consider site for

Allocation Ref	Site Name	New Site/Previously Rejected Site
	Lane, Copmanthorpe	residential allocation. Was previously allocated as part of safeguarded land (SF5) at Local Plan Publication Draft (2014). Access would via Moor Lane in conjunction with ST13 allocation (not included within PSC, 2016). Submitted Transport and Access Statement. Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as a residential site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 152.**
Site 789	Land at Beckside, Elvington	Representation received from planning agent OBO Landowner. Objects to rejection of the site for residential allocation or safeguarded land. No additional evidence submitted through PSC. No landscape or visual impact assessment including assessment of key views submitted as set out as part of previous Site Selection Paper reports. It is maintained that the development of this site would constitute a considerable extension to Elvington Village in a sensitive location which would impact on a number of sensitive residential receptors and a number of public right of ways (PROW's). **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 153.**
Site 820 and Site 923	Land at Poppleton and Land at Poppleton (Phase 1)	Previously rejected site. Representation received from planning agent OBO landowner for wider site of 39.3 ha to be safeguarded. Refers to masterplan and evidence previously submitted as part of 2014 Further Sites Consultation. Separate representation received for 1st phase of the site for up to 200 dwellings and provision of upgrade to level crossing, car parking for Poppleton station and area of open land in perpetuity. Previously submitted as individual sites and then as a cumulative larger site (39.3ha) which all fail

Allocation Ref	Site Name	New Site/Previously Rejected Site
	Land at Poppleton and Land at Poppleton (Phase 1) Continued...	criteria 1 of the Site Selection Paper methodology (environmental assets) as within historic character and setting designations – area preventing coalescence (G5). Further evidence submitted as part of 2014 Further Sites Consultation including landscape appraisal, transport statement and masterplan. Site was rejected on the basis of landscape concerns and archaeology/heritage concerns. It is considered that this area of land is important for the setting of the city and for the setting of Poppleton due to the open landscape it provides especially as viewed from the ring road. The land prevents the coalescence between Poppleton and the city and retains a degree of separation between Upper Poppleton and Nether Poppleton. The masterplan addresses some of these issues by retaining some openspace and screening to the ring road and railway line and the village extensions would be naturally split by the railway and openspace/natural features. However, the site is still considered to be unsuitable as a plan allocation. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 154.**
Site 861/862	The Retreat	Site submitted by planning agents on behalf of the Retreat Hospital. The site contains an existing hospital (C2) specialising in mental health. Needs to relocate into modern fit for purpose hospital facility to secure long term future. New facility needs significant level of cross subsidy to achieve a viable solution. Necessary funds needed from conversion of listed building to create approx 100 residential units and new build to create 150 dwellings. Seek allocation as mixed use strategic site to include residential institution (C2), Day Care clinic (D1) and housing C3 including conversion and new build. Site area is 16.2ha including existing buildings, grounds, sports facilities (cricket pitch and tennis courts) and agricultural grazing land. There have been recent planning consents for demolition of existing buildings and replacements as well as some building in the walled garden.17/00959/FUL - Creation of an enclosed landscaped garden adjacent to the Kemp Unit, including erection of a retaining wall, fences and railings (revision to approval 16/00711/FUL to reduce size of garden) - Approved

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 861/862 Cont.....	The Retreat Continued.....	15/00421/FUL - Erection of a patient accommodation block and day care centre with associated landscaping following demolition of the existing student accommodation building - Approved 15/00419/FUL - Erection of a patient accommodation block and day care centre with associated landscaping following demolition of the existing student accommodation building - Approved The entire 16ha site is within the draft green belt and Walmgate Stray wraps around the site. The site contains a number of listed buildings: Grade 2; The Retreat Hospital Heslington Road (861 Section) Grade 2; Garrow House Heslington Road. - Student accommodation? (on 862 section of site) Grade2;Summerhouse (861 Section) All of the buildings on the site are within a conservation area. The conservation area is based on the openness of the area and the existing buildings and their setting. The north west corner is a designated Area of Archaeological Importance (AAI) which includes a Scheduled Ancient Monument - this is the mound which forms part of the civil was siege monument - SMR No. 287; Lamel Hill (Anglo-Saxon Tumulus). A small area to the north east (*62 parcel) also overlaps with the City Centre AAI. There is an Anglo/roman burial ground on site which is a huge cemetery the full extent of which is still unknown and runs underneath the existing buildings. There is also a burial ground which contains many Quakers including Joseph Rowntree. The Gardens of the site contain elements of designated open space which includes a cricket pitch, bowling green and tennis courts. It is known that the tennis courts have not been taken care of and have therefore degraded over time. All of the site to the south of existing buildings is designated as part of Green Wedge C3 and the site is very important in contributing to the openness and feel of that green wedge as well as it

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 861/862 Cont.....	The Retreat Continued.....	playing an important role in terms of biodiversity. The mature trees to the east of the site are important and although there is an enclosure wall to the south of these, the area is open to the East. The wall returns around the burial ground. All of the site is sensitive in terms of its impact on heritage and landscape. The area closest to the road has views of the Wolds and is prominent in how it can be perceived. The sports ground and area to the north form plateaus. Even though the site is walled the higher areas offer views in and out of the area which contribute to a sense of openness which needs to be preserved. All of the cemetery, sports facilities and burial ground form part of the setting of Walmgate stray. It would be impossible to retain the landscape character of the area if new buildings were added. The area to the south is not just one big field but contains many different elements, it merges with the adjacent university land and creates good landscape flow into this and grazing land. There could be some support for retaining and converting existing buildings to the North but it would be difficult to define a green belt boundary around this. The entire site is currently within the greenbelt and needs to remain so. Access could be taken off Heslington Road but Green Dykes Hill is very steep and has a sharp bend - there are concerns as to whether further access form here would be safe. The Northern Section of the Site is within 250m of the AQMA on Lawrence Street. No technical evidence submitted as part of the consultation. Due to the significant constraints of the site and the importance of the whole site to the character setting of the City it is considered that any future development of the site needs to be assessed through Planning application processes and not as an allocation in the Local Plan. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 155.**
Site 863	Clifton Park	This site has been previously considered under site reference 187 in previous site selection reports and failed criteria 1 (environmental assets) as the site is part of green wedge (C6) and abuts the

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 863 Cont....	Clifton Park Continued....	River Corridor (B1) in the Historic Character and Setting appraisal work (2003, 2011,2013). Representation received from developer through PSC seeking allocation of 12.9ha with developable area of 3.3ha/90dwellings and open space to create new city park of 9.6ha. New masterplan submitted to create a new City Park to the eastern section directly below the former hospital site and adjacent to Shipton Road. Site continues to fail criteria 1 (environmental assets) as part of green wedge and River corridor. Site is not considered suitable for development even at the reduced level proposed in the revised materplan. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 156.**
Site 871	Land East of Northfield Lane	Representation received from planning agents on behalf of landowner. 48ha ha site submitted for up to 1000 units. Proposed boundary change to previously rejected site 250. Site is in single ownership, is close to existing services along Beckfield Lane and Boroughbridge Road and access can be provided via A59. Site has no specific landscape features with some mature hedgerows and trees providing dense screening to A1237. Landscape assessment submitted by CSA Environmental. Views from A1237 limited and where views exist it presents a blunt edge to the settlement. The proposals would retain the southern part of the site as farmland with housing on northern part set back from road frontage with new landscaping. Phase 1 Habitat Survey shows predominantly intensively farmed arable fields. Some smaller grazed semi-improved permanent grassland to south. Some nesting habitats potential in farm buildings. Site fails criteria 1 as it is within historic character and setting area, partly area preventing coalescence (G4) and area retaining rural setting. This land creates a physical and visual separation between the A1237 and the main urban area of York and between Knapton and Beckfield Lane.

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 871 Cont.....	Land East of Northfield Lane Continued.....	Whilst it is acknowledged that landscaping could provide some mitigation the introduction of a solid form in this location would compromise what is currently open countryside. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 157.**
Site 875	Land beyond Riverside Gardens, Elvington	Alternative boundary of previously considered site. Additional land (12.75ha) to north submitted as safeguarded land through the PSC (2016). No further evidence submitted. Previous technical officer comments stated that the development of the site would materially affect the character of the eastern boundary of the village. Development of the site would bring the edge of the village closer to the River Derwent corridor and public rights of way (PROW). The site would visually impact on a significant number of residential receptors and Stamford Bridge (bridge). **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 158.**
Site 882	Land East and West of Askham Lane/A1237	Previously rejected site. Submission by planning agent OBO landowner/developer. Objects to lack of housing or safeguarded land allocation. Site can deliver 500+ houses. Site split by Askham Lane and is currently agricultural land. Eastern section is smaller and comprises an agricultural field bound to west by Askham Lane and to east by field boundary and beyond The Gallops and Osprey Close. The northern and southern boundaries of eastern section is bounded by existing hedgerow boundaries. Larger western section consist of two fields with western boundary to A1237 and to east by Askham Lane. Links to Site 782 and H9 parcels to north of eastern section. Reference to previous evidence including Archaeology, Transport and Infrastrcuture Report, Masterplan and Landscape and Visual Impact Assessment. Site is within historic character and setting area - area retaining rural setting and therefore fails criteria 1 (environmental assets) of the site selection paper methodology. It is considered that the development of the site would compromise the setting of the city especially given the gentle topography of the site and that the rural edge of the city would be lost especially when experienced

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 882 Cont....	Land East and West of Askham Lane/A1237 Continued....	on the approach to Askham Lane and the A1237. The landscaping proposed would not mitigate for the loss of openness, impact on landscape character or on the setting of the city. The introduction of high hedging could not mitigate for this impact as the introduction of buildings in this location would still introduce a solid form which would compromise the fluidity and feel of the landscape. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 159.**
Site 887	Land East of Northfield Lane, Poppleton	Previously considered site. Officers consider that this site provides a buffer between development at North minster Business Park and the A1237. Allowing built development to stretch closer to the western boundary of the ring road would increase the feeling of urbanisation in this area. The development of this open area would significantly reduce the gap between the Ring Road and what in effect would become the southern edge of Poppleton village. Development of this area would consolidate development in this area Potential access to the site is proposed from two points on Northfield Lane. Further traffic assessments would need to be carried out as to the impact any potential site would have on the existing road network and in particular the junction with the A59 and the A59/A1237 roundabout. Any study would also need to take account the use of the road and the proposed expansion of Northminster Business Park. The site is some distance from Poppleton village and associated facilities including shops, GP surgery and primary school. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 160.**
Site 891/922	Galtres Garden Village	New Site submitted through PSC (2016) Original site submitted through PSC was for 38.7ha and up to 953 dwellings. The site passes the

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 891/922 Cont...	Galtres Garden Village Continued....	first 3 site selection criteria but based on this boundary fails the sustainable access criteria (4a and 4b) not meeting the minimum scoring threshold for residential sites. The location of the site adjacent to the A1237 means it currently has very limited access to existing services and does not attain the minimum score required to be considered further as a potential residential site. The revised submission extends the site to 78.8ha (up to 1500 dwellings) and includes the provision of a pedestrian and cycle footbridge over the A1237 which would potentially improve its access to existing facilities within the Huntington area. It is not currently clear what services this would then bring within a suitable walking/cycling distance. It is noted that the revised masterplan includes the provision of a 'village hub' which it is proposed would include a primary school, playing pitches and retail/community facilities (circa 0.15ha). Provision of a village centre including an appropriate range of shops and community facilities would be essential to make this site function as a sustainable settlement. This provision would need to taken into account in considering the overall viability of the site. Through the Local Plan spatial strategy and the evidence base we have identified those areas that are most important for maintaining the historic character and setting of York. The Galtres Village site is located directly adjacent to the A1237 and it is considered that the site boundary and layout reflects neither an urban extension or a separate settlement or 'garden village'. It is not considered that the site reflects the urban form of York which is a compact city surrounded by a 'clock face' of smaller independent villages. This also reflects previous consultation comments received from statutory consultees including Historic England. Whilst it is accepted that the revised masterplan includes a widened landscape buffer to the A1237 it is not considered it provides an adequate setting for the site. In terms of access it is proposed that the site would be accessed from a realigned North Lane roundabout with a 5 arm junction and an additional road access to the east of the roundabout onto North Lane. A bus only link is also proposed to the A1237. Providing suitable access to the site and mitigating the impacts of this site on the highway network are likely to be difficult and expensive which would impact on the site viability and deliverability. The submissions to date do not evidence

Allocation Ref	Site Name	New Site/Previously Rejected Site
		a suitable, safe access that is acceptable to the Council. Overall there are concerns regarding the viability and deliverability of the site based on the provision of the community facilities and services required in order for it to function as a sustainable settlement and in addition the required highway mitigation including the potential new junctions/roundabouts to the A1237 and proposed footbridge over the A1237. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 161.**
Site 892	Land at Grange Fm, Strensall Rd,	New Site submitted through PSC Site fails criteria 1 (environmental assets) as it is within an area preventing coalescence (G1) in the Historic Character and Setting work (2003,2011,2013) criteria 1 **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 162.**
Site 894	Land at Crossmoor Lane and Usher Lane, Haxby	New Site submitted through PSC (2016) Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as a residential site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 163.**
Site 902	Land south of Strensall Village	Alternative boundary of previously considered site (Site 825/SF1) SF1 (825) Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as a residential site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 164.**

Allocation Ref	Site Name	New Site/Previously Rejected Site
Non- Strategic Sites		
H26	Land at Dauby Lane, Elvington	**<u>Deleted Site H26: Land at Dauby Lane, Elvington</u>** **Total representations: 19** **Supports:2** **Objections:16** **Comments: 1** Supports for the removal of the site consider that H26 does not offer an alternative to H39 and is not logical site for housing development. A number of objections to the removal of the site from members of the public and Elvington Parish Council. They consider that site H26 should be re-allocated and replace site H39 (Land to North of Church Lane, Elvington). Reasons for this include that H26 is a larger site so could provide a better mix of family housing including affordable homes, has direct access to Elvington Lane so would cause less impact on the village centre, is close to facilities including the school, medical centre and open space and would also bring the two areas of the village together and create better linkages. Representation received from planning agent on behalf of developer. They object to the removal of the land from the Plan due to disagreement with the overall housing requirement (OAN), lack of safeguarded land policy, density assumptions and concerns over York Central (ST5) and Land West of Elvington Lane (ST15) delivery. Site previously passed CYC Site Selection criteria and serves no or limited greenbelt purpose as previously included as allocation. The site is well contained visually and physically and is at the heart of the settlement. This is a small gap in an otherwise built up settlement and allocation would not harm the character or form of Elvington. No constraints as proven by previous evidence submitted for the site including archaeology (evaluation and trail trenching), flood risk and drainage, air quality assessment, transport assessment, travel

Allocation Ref	Site Name	New Site/Previously Rejected Site
H26 Cont....	Land at Dauby Lane, Elvington Continued....	plan, ecological appraisal and bat survey. Site was removed from PSC due to concerns regarding the impact of the development on the character of the village given its development would extend the village well beyond the main village centre and settlement limits. The site currently provides a gap between the main village centre and the industrial/commercial areas to the north. Whilst it is recognised that the site is partially contained by hedge and tree screening to the north west, Elvington Lane to the south and SINC to the west it is considered that the site would still constitute a significant change to the shape and form of the current village. Officers consider that the H39 site offers a more logical extension to the existing village and that on balance would be preferable to H26. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 165.**
H27	The Brecks, Strensall	**Deleted Site H27: Land at the Brecks, Strensall** **Total representations: 76** **Supports:72** **Objections:2** **Comments: 2** Number of supports for the removal of the site at PSC including from the parish council and members of the public. Many recognise that that the village of Strensall is already large enough and that the existing infrastructure including roads, drainage and sewerage and community facilities including schools, shops and GP's are at capacity already. Also concerns over the impact of the development on what is currently natural/semi-natural open space and potential impacts on Strensall Common SSSI. Objection to the sites removal from the landowner/developer. They state that the site has consistently been excluded from draft green belt boundaries and CYC has confirmed on may

Allocation Ref	Site Name	New Site/Previously Rejected Site
H27 Cont.....	The Brecks, Strensall Continued.....	occasions that it does not serve and green belt purposes. It is incorrect for CYC to rely on SoS and Inspector's conclusions in relation to the call-in Inquiry in discounting Brecks Lane as an allocation as this decision was made in the context of the site being situated within the Green Belt and whether its development was justified by very special circumstances (and it was found that it was not). This 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 that would have no unacceptable environmental impacts or create unacceptable impacts upon amenity of new and existing residents. There are no insurmountable constraints and the site is deliverable within 5 years. The site has recently been refused by the Inspector and Secretary of State at appeal and the decision concluded that the development of the site would impact on the purposes of greenbelt including on opened, encroachment and unrestricted sprawl. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 166.**
H30	Land South of Strensall Village	**Deleted Site H30: Land south of Strensall Village** **Total representations: 78** **Supports:72** **Objections:1** **Comments: 1** Number of supports for the removal of the site at PSC including from the parish council and members of the public. Many recognise that that the village of Strensall is already large enough and that the existing infrastructure including roads, drainage and sewerage and community facilities including schools, shops and GP's are at capacity already. There was also concerns raised regarding the narrow access to the site and the impact on the village centre which is already congested.

Allocation Ref	Site Name	New Site/Previously Rejected Site
H30 Cont....	Land South of Strensall Village Continued....	Objections from various landowner/developers seeking the allocation of the site for housing development. The site was part of a larger area of land proposed for housing in the Preferred Options Local Plan 2013. From the Council's methodology it is clear therefore that the site has been run through a detailed suitability assessment process and has been judged to be in a sustainable location, relatively unconstrained and suitable for development. The revised access design provides an acceptable junction with The Village and is of a sufficient standard to serve up to 25 dwellings, thus is more than sufficient to serve a development of 11 dwellings. Overall the proposal satisfies local and national planning policy requirements and in the absence of a 5-year land supply there is a need to allocate sites such as the objection site (H30 (part)) that can be brought forward quickly to address the significant underprovision in housing supply across the plan period and, more particularly in the first 5 years of the plan Representation also received from landowner of land both sides of railway line who states the proposal would include provision of land for a car park for proposed rail halt. Proposing eco/self build scheme with modular construction. Provision of low cost self build plots using modular construction. Application (15/02353/OUTM) refused 12/1/2016. Appeal dismissed 27/10/16 (APP/C2741/4/16/3154113). Inspector concluded that site is within general extent of GB as saved by RSS. Appellant argued site was not within general extent due to enclosure and separation from open countryside. Inspector concluded that the site had a fringe of village location with housing to north and east, open fields to west and railway line to south with open countryside beyond. Strensall is already a significant size with extensive modern housing extending from historic core. Unrestricted sprawl applicable here and proposal would conflict with this purpose. Site is not within settlement limits of village and is undeveloped Greenfield parcel on edge of village with open countryside to south and west. Considered to be encroachment into open countryside. Very special circumstances not demonstrated.

Allocation Ref	Site Name	New Site/Previously Rejected Site
H30 Cont....	Land South of Strensall Village Continued....	Highways Safety – Supplementary transport note submitted in appeal which addressed CYC concerns and incl. revised access design. Appears to include adequate visibility splays and shared access way sufficient to serve development and not prejudice future development of adjacent land. The site has recently been refused by the Inspector and Secretary of State at appeal and the decision concluded that the development of the site would impact on the purposes of greenbelt including on openness, encroachment and unrestricted sprawl. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 167.**
H33	Water Tower Land, Dunnington	**<u>Deleted Site H33: Water Tower Lane, Dunnington</u>** **Total representations: 15** **Supports:15** **Objections: 1** **Comments: 0** Supports for the removal of the site including from Parish Council and members of the public. Considered that Eastfield Lane forms a clear and well defined boundary for the northern edge of the village. This land is part of the York Moraine and is currently productive agricultural land. Inclusion of this land for development would compromise defensible Green Belt boundaries. Any additional housing in this location would potentially make the already precarious surface water drainage issue for the village much worse. The development of this site would impact the junction of Church Balk / Eastfield Lane, which is already problematic. Considered that development would destroy ancient native hedgerows, would seriously affect drainage capacity and cause more flooding, have negative impacts on parking and congestion in the centre of the village at the "Cross" area, changes to road may harm the conservation area, concerns over access and congestion around

Allocation Ref	Site Name	New Site/Previously Rejected Site
H33 Cont....	Water Tower Land, Dunnington	Pear Tree Lane School, the development would over look the cemetery and intrude on people tending to graves and increased demand for facilities in Dunnington requiring extra funding. Objection to the sites removal from landowner/developer. Site would create a consistent boundary to the northern edge of the village following the line already established by houses to the west of Church Balk and continued by the expansion of the cemetery. Consider that ther water tower is local landmark and is the first property on Church Balk as you approach from the north. The existing dormer bungalows on southern side have already shifted settlement limit to the north of Eastfield lane and development of this site will establish a consistent boundary filling in gap between existing housing. York Moriane is low curving ridge and the gradual fall from the north to south is only perceptible on site. Travelling south along Church Balk towards the village core the views are screened by high hedging on western boundary. Masterplan provides extensive landscape buffer to Church Balk and the Roam Road can be accommodated within the site layout. Further land can be made available for additional car parking for Dunnington Church and also for playing pitches to north between Water Tower and A166. H33 submitted plus further 2.4ha to north (as previously rejected). It is accepted that the site is partially contained by trees and appropriate landscaping could mitigate some impacts however the existing trees are intermittent and there are views into the site from Church Balk. The site is part of the York Moraine which forms parts of the character and setting of the village. Further extension of the site to the north would impact on the character and setting of the village, it is important to retain the separation to the A166. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 168.**

Allocation Ref	Site Name	New Site/Previously Rejected Site
H34	Land North of Church Lane, Skelton	**<u>Deleted Site H34: Land north of North Lane, Skelton</u>** **Total representations: 6** **Supports:3** **Objections: 3** **Comments: 0** Support for the removal of the site from Parish Council and the Skelton Village Action Group. Objection from planning agent on behalf of landowner. Landowner objects to the removal of former allocation H34, the suggested housing requirement and the lack of safeguarded land policy and allocations. The site previously passed the Council's site selection criteria and was proposed for allocation in the Preferred Options Draft and the Publication Draft version of the Plan. The PSC gives the reason for removal of the site as access concerns and impact on conservation area. Disagree with the reasons and submit a Transport and Access Statement and a detailed drawing of the proposed access arrangements. Also demonstrate that the widening of Church Lane has been kept to a minimum and would only affect the section of Church Lane which runs the width of the site and away from Skelton conservation area and St Giles Church. Representation also received from further developer objecting to removal of site. Church Lane is a single carriageway with grass verges. In order to accommodate the proposed development, Church Lane would need to be widened and would also be required to provide a footway either side. This widening would need to be carried out from the junction of Church lane with the A19 to a point further East, beyond where the site access for H34 would meet Church Lane. While Church lane is not entirely within the conservation area it is directly adjacent to its boundary and within proximity to St Giles Church (Grade 1 Listed Building). The National Planning Policy

Allocation Ref	Site Name	New Site/Previously Rejected Site
H34	Land North of Church Lane, Skelton	Framework asks that Local Planning authorities identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development which might affect the setting of a heritage asset) as heritage assets are irreplaceable, any harm should require clear and convincing justification. Church Lane is of significance to Skelton Conservation area and St Giles Church as it provides the approach to both and is therefore part of the context and setting of both heritage assets. The Synopsis of what makes Skelton Conservation Area Special (which can be viewed online here: https://www.york.gov.uk/info/20215/conservation_and_listed_buildings/1325/conservation_areas_in_york) notes that although more recent suburban style houses have been introduced along Church Lane "it is lined by trees and hedges, sufficient to maintain the county lane character". When discussing the main elements of the character and appearance of the village, the way that boundary walls, hedges, grass verges and roadside trees lead naturally from one part of the village to another is also listed as being an important consideration. The necessity to widen Church Lane would remove its country lane character, grass verges and trees, thereby having a potentially negative impact on the heritage assets. The additional traffic which would be generated by a development of this size and could potentially add to congestion on the existing roads of the village and may have a potentially negatively impact on the villages existing character. The submitted documents have been reviewed and it is noted that while the access could technically be widened sufficiently, if this were to include much needed footways and provide pedestrian access to the bus stops on the A19 this would still result in the loss of grass verges at an important entry point to the village and would significantly change the nature of the area in this location. It is considered that suitable access to the site could not be designed without adversely

Allocation Ref	Site Name	New Site/Previously Rejected Site
H34	Land North of Church Lane, Skelton	impacting on the character of this narrow lane which forms part of the Skelton conservation area and the wider setting for St Giles Church. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 169.**
H35	Land at Intake Lane, Dunnington	**<u>Deleted Site H35: Land at Intake Lane, Dunnington</u>** **Total representations: 17** **Supports:14** **Objections: 3** **Comments: 0** Support for the removal of this site including from the Parish Council and members of the public. Development of this site would require access from Intake Lane, which is a narrow lane at this point. Any development on this site will probably precipitate development of the north side of Intake Lane, which would lose the rural character of the existing cluster of 4 houses further along the lane. The lane itself is of particular value to the village as it is used regularly for walking to Hagg Wood and the surrounding countryside as part of Route 66. The site is "landlocked" as requires the purchase of some of the allocated land, development would threaten ancient native hedgerows, the development would seriously affect drainage capacity and cause more flooding, negative impacts on parking widening highways and congestion (Common Rd and Intake Lane). The Landowner/developers object to the proposed deletion of housing allocation H35, to the suggested housing requirement and to the lack of a safeguarded land policy and allocations.. Disagree with the proposed removal of the site in PSC on access grounds. Demonstrate through submission that Barratt and David Wilson Homes have an option to acquire the H31 site. The option requires B&DWH to provide an access through to allow the development of H35. We have

Allocation Ref	Site Name	New Site/Previously Rejected Site
H35	Land at Intake Lane, Dunnington	demonstrated that the layout plan for H31 shows an access from Eastfield Lane through the development and also that the developer of H35 controls all the land up to the southern boundary of H31. On this basis there is no access constraint to the development and it should be re-allocated for housing. Officers have considered the evidence submitted through the PSC and whilst this lessens the risk of site H35 being landlocked, it doesn't eliminate the risk entirely, as it will need Barratt and David Wilson Homes to actually purchase the land and construct the access. Failure to do both of these will result in Site H35 still being landlocked. Given the layout and shape of the site it would also result in an elongated access road through H31into H35. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 170.**
H50	Land at Malton Road, Huntington	**Deleted Site H50: Land at Malton Road, Huntington** **Total representations: 3** **Supports:1** **Objections: 1** **Comments: 1** One support received to the removal of the site from PSC. Comment received from the Environment Agency (EA) who state that they are 'pleased to see that floor risk has been given significant importance during the site assessment process and they welcome the further review of sites to ensure that a sequential approach is taken'. Also state that 'in line with the sequential approach to location of new development as per the NPPF they support the removal of sites on flood risk grounds where there are other suitable sites available at a lower risk'.

Allocation Ref	Site Name	New Site/Previously Rejected Site
H50 Cont....	Land at Malton Road, Huntington Continued...	In relation to this site they state that 'they are pleased to see Site H50 removed'. Objection received from planning agent on behalf of landowner/developer. Object to the removal of the site in PSC on flood risk/sequential test grounds. Site is in a sustainable location close to local facilities and has well defined boundaries. The 7.1ha site could provide up to 150 dwellings. PSC removed site on sequential test grounds stating that other sustainable sites in lower flood risk zone. PSC states that part of site in flood zone 3a and 3b and majority in flood zone 2. Previously submitted Lidar data confirms that smaller area within zones 2, 3a and 3b than in current EA and SFRA. Majority of site is in flood zone 1. PSC also states that site is in a green wedge adjacent to Monk Stray and gives a sense of openness along New Lane separating existing Huntington area from commercial area of Monks Cross. Previously submitted GreenBelt Appraisal (URS) demonstrates that development would not compromise the green wedge and would not impact on views of the Minster from A1036. Officers consider that whilst part of the site is in a lower flood risk zone there are still concerns regarding the impact of the development of the site on the green wedge adjacent to Monk Stray and the current sense of openness experienced along New Lane which provides separation between the existing Huntington area and the commercial area of the Monks Cross development. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 171.**
Site 3	Chowdene	Previously rejected site. No further evidence submitted. Site fails criteria 1 of the site selection methodology as within a Site of Local Interest (SLI) – Monks Cross Balancing Ponds and there are great crested newts in the surrounding area. Also the site is adjacent to area of importance for historic character and setting – green wedge (C2). **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 172.**

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 9	Land to west of Common Road, Dunnington	Previously rejected site considered previously under site references 697 and 328. Representation from planning agent on behalf of landowner/developer. Objects to the lack of a specific policy dealing with specialist older persons accommodation and the corresponding lack of site specific allocations and in particular the inclusion of the site to the west of Common Road Dunnington . The need for elderly person's accommodation is demonstrated in the SHMA. The site would provide much needed accommodation for the elderly and provide a significant area of open space. Development only proposed on the area of land that lies within flood zone 1. Large part of site is within flood zone 3 so previously discounted. The proposed scheme for the site has been discussed at a meeting of Dunnington Parish Council and initial discussions with Dunnington and Grimston Sports and Leisure Centre. The proposals include the erection of a 2 storey retirement living apartment block of 35 units with associated parking (use class C3). This element of development would take up only a small proportion of the site area all within flood zone 1. It is envisaged that the bulk of the site would be given over for the provision of additional sports facilities and the creation of areas of ecological enhancement. The second element of the development is a proposed new cricket pitch which will replace the existing cricket pitch on the opposite side of Common Road allowing the existing pitch to be converted into additional sports facilities. It is proposed that a new car park and pavilion is provided for the cricket facility within the site. The proposed development is to be accessed via a single priority junction onto Common Road to serve the retirement scheme and the sports facilities and car park. Site has been considered previously and rejected as a residential sites as part of the site is within flood risk zone 3a which means that part the site fails criteria 3 of the site selection methodology and this effectively splits the site in half. The northern remaining land parcel is approx 0.98ha and is a triangle of land which would not fit well with the urban form of Dunnington in terms of structured residential development and would offer no identifiable or logical boundaries.

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 9 Cont.....	Land to west of Common Road, Dunnington Continued....	The site is also important to the setting of the village, namely division from the adjacent industrial park. Furthermore, it is considered that this site would substantially effect the southern boundary of the village. The significant screening and landscaping required to mitigate would also in itself impact on the character and setting of the area. The site is also adjacent to Hassacar pond SINC site and there are Great Crested Newts within the site. The site is partly located in an area of high flood risk (zone 3a) and therefore an exceptions test will need to be undertaken and a Flood Risk Assessment will be required, regardless of size of the development, in line with the Council's Strategic Flood Risk Assessment. Whilst the site may be found to be suitable for the proposed older persons accommodation it is considered that this should be assessed through the detailed planning application process and that given the sequential approach taken to the allocation of sites in the Local Plan that the site should not be allocated for residential use. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 173.**
Site 23	Acomb Grange	Previously rejected sites as part of larger amalgamated site 302. Representation received from landowner. Would like site re-considered for housing. Site submitted through Call for Sites and subsequent consultation on the local plan. Site is not currently in use and is well screened by woodland. The site is adjacent to Chapelfields and has existing access via former Wetherby Turnpike and Broad Lane. The site would be suitable for 3-4 bungalows with good access to local facilities. The site is surrounded by existing residential use. Site is part of Historic Character and Setting Area - Area Retaining Rural Setting' designated in the

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 23 Cont...	Acomb Grange Continued.....	2013 Historic Character and Setting Paper and therefore fails criteria 1 of the site selection methodology (environmental assets). The land between the A1237 and Chapelfields, to the south of the B1224 and Askham Lane provides an interface between the built up part of York and the flat rural areas adjacent to the Outer Ring Road. In character terms it is a continuation of the land between Moor Lane and Askham Lane, to the west of Woodthorpe. Therefore, it is considered that this designation should be extended north, as far as the B1224, between Chapelfields and the A1237. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 174.**
Site 82	Land at Knapton Lane	Site submitted for re-consideration for residential development of 14 dwellings. The site is immediately available for residential development and is under the sole ownership of the developer. The site comprises vacant vegetated land located to north of Knapton Lane and is bounded by residential development to the north, east and south across Knapton Lane. The site would provide logical infill and settlement rounding off and a more rational and defensible boundary line to existing development. The site was subject to a planning application for residential development in 2015 (15/01711/OUTM) which was refused on 16/12/15 on the basis that the Council concluded that the site did not represent appropriate development in the greenbelt and no special circumstances were demonstrated, harm to the character and appearance of the area through estate development rather than frontage development, loss of habitats and biodiversity and loss of TPO trees. The loss of habitats and TPO reasons for refusal can be addressed by replacement planting. The applicant owns the field to the west (Ten Thorne Lane) which is not proposed for development but can provide a tree buffer or small woodland which would provide habitat and replacement trees of better quality than the trees subject to TPO (CYC341). An ecological appraisal was submitted with the application which concluded no conclusive evidence of any specifically protected species. The other reasons for refusal can be addressed through site layout. The site fails criteria 1 of the site selection paper (environmental assets) as it falls within area

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 82	Land at Knapton Lane Continued....	preventing coalescence G4. This site is an important green buffer between the city and knapton Having separate villages which surround York's Main urban area are a key part of York's development history and this aspect is considered important in maintaining the special character of York moving forward hence the identification of areas preventing Coalescence in the Green Belt Appraisal document 2003. Also concern about the impact on the setting of the city and the loss of this open aspect on approaching the main urban area. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 175.**
Site 112	Brook Nook, Osbaldwick	Previously rejected site. Site fails criteria 1 of the site selection paper methodology (environmental assets) as it within an area of importance for the historic character and setting of the City - Area preventing coalescence (G2). Part of the site also falls within flood zone 3a/3b. Part of the site also falls within flood zone 3a/3b. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 176.**
Site 191	Land at Avon Drive	Representation from developer/landowner submitting details and evidence from application and appeal. Recent appeal on the site dismissed by the Inspector. Previous reasons for rejection as a site allocation remain. Landscape/setting concerns regarding the impact on openness and bringing development directly adjacent to the A1237. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 177.**
Site 215	Black Dyke Farm, Upper Poppleton	Previously rejected site. Large part of the site is within an area of importance to the historic character and setting of the city - Area protecting village setting (E2) and therefore fails criteria 1 of the site selection methodology. The remainder of the site outside of this constraint is under the site

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 215 Cont...	Black Dyke Farm, Upper Poppleton Continued...	allocation threshold of 0.2ha. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 178.**
Site 291	Land west of Bishopthorpe	Previously rejected site. Site is within an area of importance to the historic character and setting of the city - Area protecting village setting (E4) and therefore fails criteria 1 of the site selection methodology. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 179**
Site 737	Church Balk, Dunnington	Previously rejected site. 1.85ha site currently in arable use and bounded by substantial hedgerows. Site lies on west of Church Balk, Dunnington. Site is located in flood zone 1. Site can be accessed from Church Balk which has a good connection to the A166. The site is available and deliverable. Site previously failed site selection process at technical officer stage due to landscape impacts. Considered that development of the site would impact on the setting of Dunnington village and that the village boundary needs to maintain separation to main arterial road. No additional evidence submitted through PSC. Previous reasons for rejection still stand. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 180**
Site 738	Land south side of Intake Lane	Previously rejected site. Representation from landowner/developer. Site re-submitted for housing. Site previously failed site selection process at technical officer stage due to landscape impacts. Considered that development of the site would impact on the setting of Dunnington village. Intake Lane provides a identifiable containment to the village edge. No additional evidence submitted through PSC. Previous reasons for rejection still stand.

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 738 Cont....	Land south side of Intake Lane Continued...	**Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 181**
Site 752	Land at East Field, Wheldrake	Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as a residential site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 182 .**
Site 767	Land East of Selby Road, Fulford	Previously rejected site. Site is within an area of importance to the historic character and setting of the city - green wedge (C5) and therefore fails criteria 1 of the site selection methodology. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 183**
Site 792	Land South of Foxwood Lane	Previously rejected site. Site is within an area of importance to the historic character and setting of the city - Area protecting rural setting and therefore fails criteria 1 of the site selection methodology. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 184**
Site 866	The Fox Pub, Holgate	**New Site submitted through PSC (2016)** Site measures 0.19ha and is therefore under allocation threshold for the Local Plan of 0.2ha. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 185**

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 867	Land at Derwent Arms, Osbaldwick	**New Site submitted through PSC (2016)** The submission is for a 1ha site to the rear of the Derwent Arms but aims to retain the Pub in its existing use. The proposal is for a 70 bed care home in this location The site lies entirely within a designated heritage asset – Osbaldwick Conservation Area and is within close proximity of listed buildings. No evidence submitted to demonstrate impact on the heritage assets. In line with NPPF requirements proposals will be required to maintain or enhance existing urban spaces, views, landmarks, and other townscape elements, which contribute to the character or appearance of the area. Ecological evidence is required to understand species on site. It is understood that part of the grassland has been less intensively managed, which could result in botanical interest. The existing hedgerows are likely to provide habitat for nesting birds, foraging and commuting bats. Furthermore, this area is sensitive to the introduction of new lighting sources and the impact these could have on wildlife. It is important to maintain a dark corridor in this area. The site is located within a District Green Corridor as set out in the City of York Biodiversity Action Plan (Draft, 2013); Osbaldwick / Tanghall Beck Corridor (District Corridor 16). The boundaries of the corridors are indicative but sites of lower individual interest can have their value enhanced through their position in linking other sites together. Great crested newts have been recorded within the area (from the Derwenthorpe development site) and there are ponds with connecting habitat within 500m of the site. The site may support suitable terrestrial habitat for amphibians and impact on great crested newts should be assessed. Mature hedgerows are a key landscape feature particularly to the western boundary to Metcalfe Lane and northern boundary of the site, which in turn connects into the wider landscape. These

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 867	Land at Derwent Arms, Osbaldwick	features need further consideration. The Strategic Flood Risk Assessment shows that the site is adjacent (at the southern boundary) to an area of high flood risk (zone 3). While a needs survey for the care home has been submitted no evidence in relation to the sites constraints has been received. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 186**
Site 868	Half Moon Pub, Strensall	**New Site submitted through PSC (2016)** Site is 0.17ha and is therefore under allocation threshold for the Local Plan of 0.2ha. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 187**
Site 869	The Marica Pub, Bishopthorpe	**New Site submitted through PSC** Site is 0.17 ha and is therefore under allocation threshold for the Local Plan of 0.2ha. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 188**
Site 870	Nags Head, Askham Bryan	**New Site submitted through PSC** Site is within an area of importance to the historic character and setting of the city - area protecting village setting (E1) and therefore fails criteria 1 of the site selection methodology. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 189**

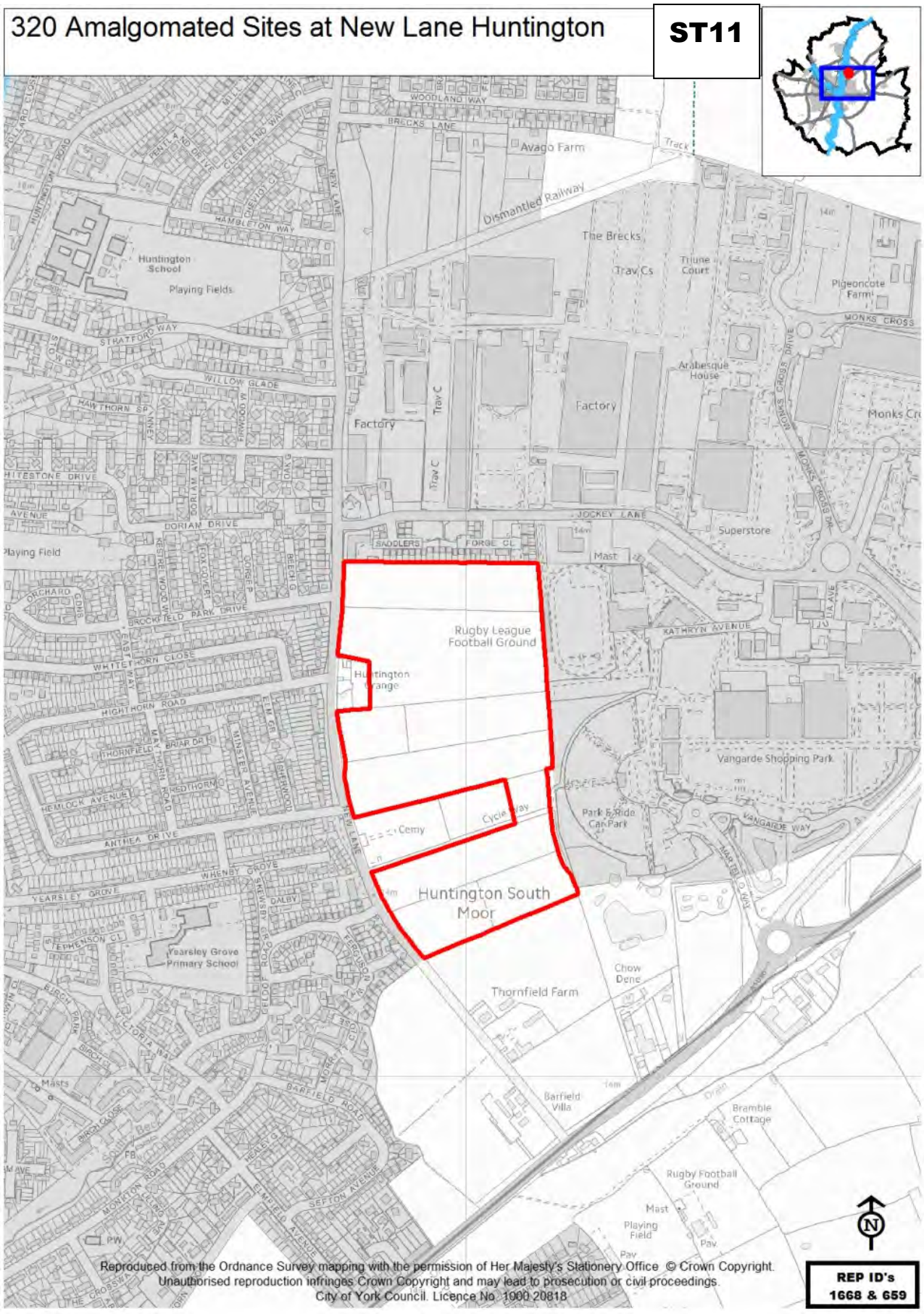
Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 884	Land SW of A1237/A59 junction	**New Site submitted through PSC (2016)** Site is within an Site of Local Interest (SLI) – Wheatlands Reserve and therefore fails criteria 1 of the site selection methodology (environmental assets). **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 190**
Site 885	Minster Equine Vetinary Clinic, Northfield Lane	**New Site submitted through PSC** Re-considered as employment site to reflect Poppleton Neighbourhood Plan. Please see refer to Annex 4 and page 191 of this document.
Site 886	Land at Northfield Lane	**New Site submitted through PSC (2016)** Officers consider that this site provides a buffer between development at North minster Business Park and the A1237. Allowing built development to stretch closer to the western boundary of the ring road would increase the feeling of urbanisation in this area. The development of this open area would significantly reduce the gap between the Ring Road and what in effect would become the southern edge of Poppleton village. Development of this area would consolidate development in this area Potential access to the site is proposed from two points on Northfield Lane. Further traffic assessments would need to be carried out as to the impact any potential site would have on the existing road network and in particular the junction with the A59 and the A59/A1237 roundabout. Any study would also need to take account the use of the road and the proposed expansion of Northminster Business Park. The site is some distance from Poppleton village and associated facilities including shops, GP surgery and primary school. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 192**

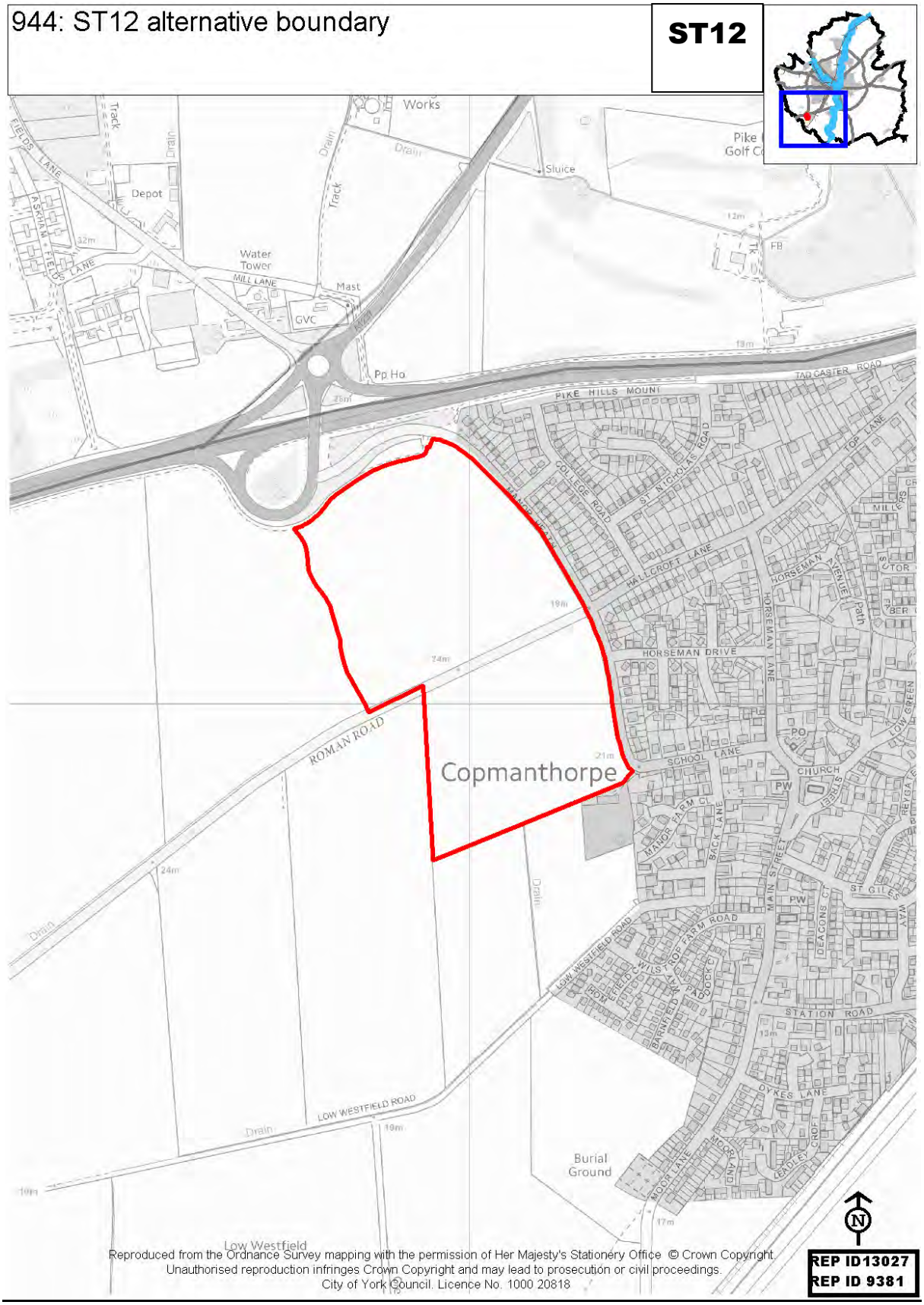
Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 890	Luigis Restaurant, Northfield Lane	**New Site submitted through PSC (2016)** Re-considered as employment site to reflect Poppleton Neighbourhood Plan. Please see refer to Annex 4 and page 193 of this document.
Site 893	Sun and Moon Cottage, Bad Bargain Lane	**New site** Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as a residential site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 194**
Site 895	Meadow Farm, Cross Moor Lane, Haxby	**New Site submitted through PSC (2016)** Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as a residential site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 195.**
Site 897	Land Adjacent to Landing Lane Haxby	**New site submitted through PSC** Site is within an area of importance to the historic character and setting of the city - area preventing coalescence (G1) and therefore fails criteria 1 of the site selection methodology. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 196.**
Site 899	York Road Dunnington Reduced Boundary	Alternative boundary of previously considered site (Site reference 74). Site is not considered suitable for residential development. The site is outside of the existing settlement limits of the village and its development would impact on the character and setting of

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 899	York Road Dunnington Reduced Boundary Continued...	Dunnington Village particularly on the approach to the village via York Road. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 197.**
Site 900	Tregarth Stables and Haxby Road Farm	Alternative boundary of previously considered site (site 68). Resubmitted but no new technical evidence submitted. Site is within an area of importance to the historic character and setting of the city - area preventing coalescence (G1) and therefore fails criteria 1 of the site selection methodology. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 198**
Site 941	Elm Tree Farm, Elvington	This site is an alternative boundary to that previously considered under reference 747 in earlier iterations of site selection work. The proposals ask for consideration of a smaller site of 0.4ha of agricultural land for up to 15 dwellings. The parcel of land proposed is smaller than that previously considered but still falls entirely within a site which has been designated as having importance to nature conservation (SINC Site 84). No evidence has been received which would explain how the ecological interest in this site could be mitigated. The site therefore fails criteria 1 of the site selection methodology (environmental assets). **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 199**
Site 942	Chapelfields PSC Submission	This site is an alternative boundary to that previously considered under reference 831 and 778 in earlier iterations of site selection work. The revised submission submitted through PSC proposes 90 dwellings taking access from Grange

Allocation Ref	Site Name	New Site/Previously Rejected Site
Site 942 Cont....	Chapelfields PSC Submission Continued....	Lane. The masterplan presents a reduced boundary to the south west of the site to take account of previously raised concerns in respect of landscaping. The further evidence has been considered and it is considered that this area is still sensitive to development which could compromise the setting of the city and the rural edge as experienced from the A1237. The site fails criteria 1 of the site selection methodology as it falls entirely within an area protecting the rural setting of the city designated in the Historic Character and Setting Topic Paper (2013). **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 200**

Annex 3: Officers Assessment of Housing Sites following PSC





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131: Moor Lane, Copmanthorpe
ST13
Copmanthorpe
ROMAN ROAD
HORSEMAN DRIVE
HORSEMAN LANE
SCHOOL LANE
CHURCH STREET
MAIN STREET
BACK LANE
MANOR FARM CL
LOW GREEN
School
Sports Ground
BARONS CRESCENT
FAIRFAX CL
ST GILES WAY
DEACONS CT
STATION ROAD
WILSTROP FARM ROAD
PADDOCK
LOW WESTFIELD ROAD
DYKES LANE
MOOR LANE
LEADLEY CROFT
Depot
Mast
Burial Ground
Low Westfield
Green Balk (Track)
Temple Field
Roxley
Path
Moor Lane Farm
Track
EARFIT LANE
Earfit Lane (Track)
Drain
LC
PO
PW
Pav
REP ID10097
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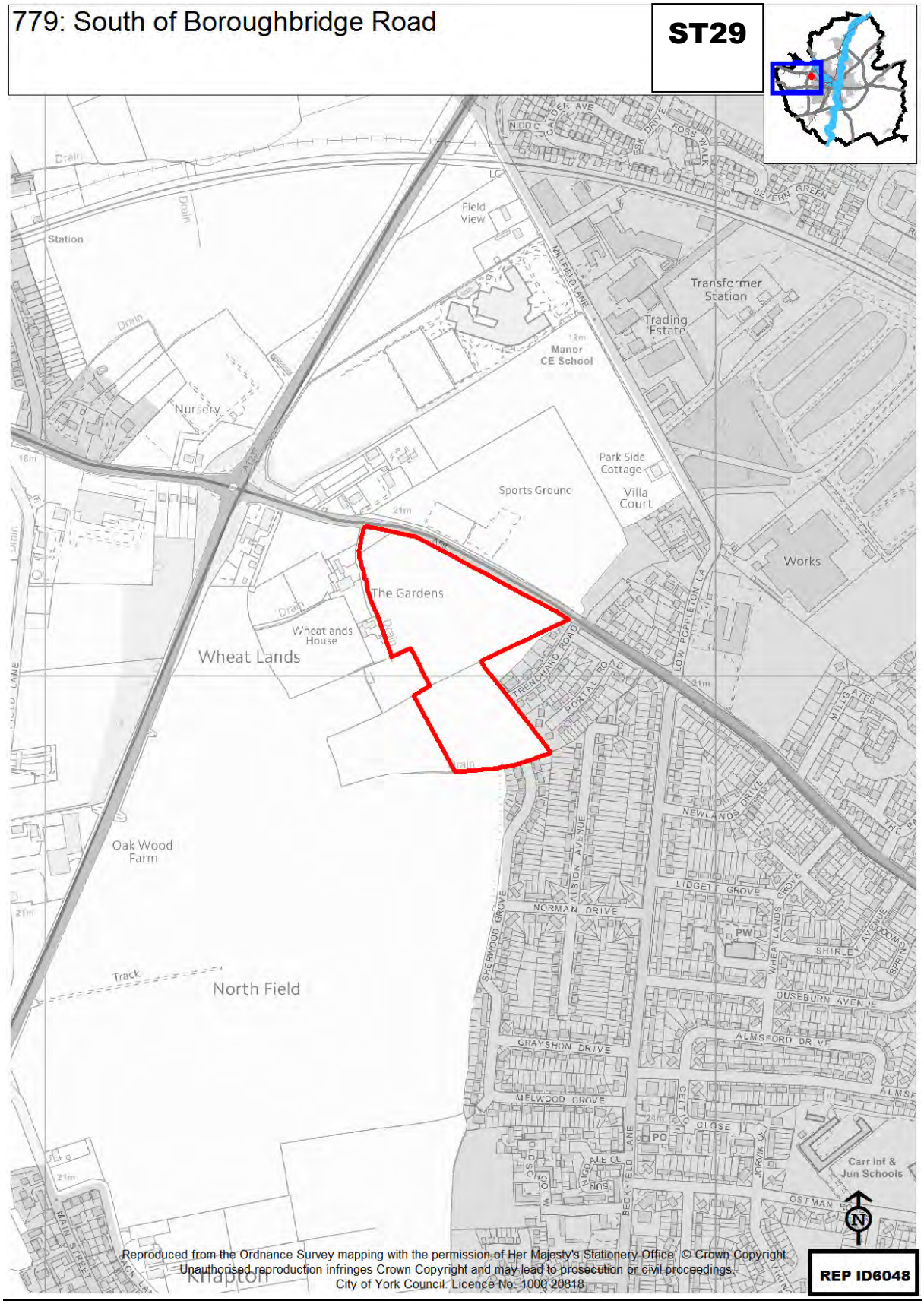
779: South of Boroughbridge Road
ST29
Drain
Station
Field View
Transformer Station
Trading Estate
Manor CE School
Nursery
Park Side Cottage
Villa Court
Sports Ground
Works
The Gardens
Wheatlands House
Wheat Lands
Oak Wood Farm
North Field
Track
Carr Inf & Jun Schools
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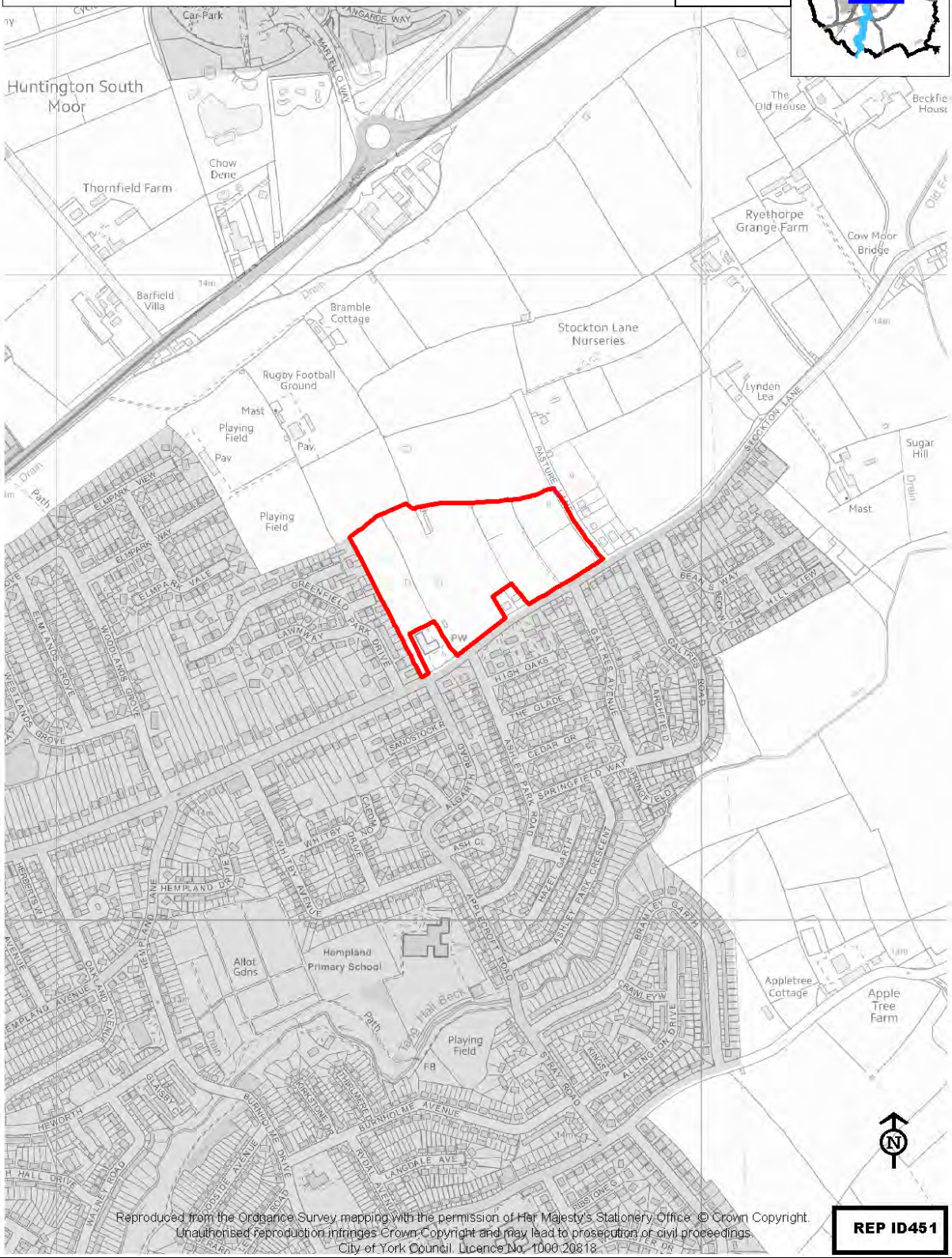
REP ID6048

187: Open Pasture Land North of Stockton Lane

ST30



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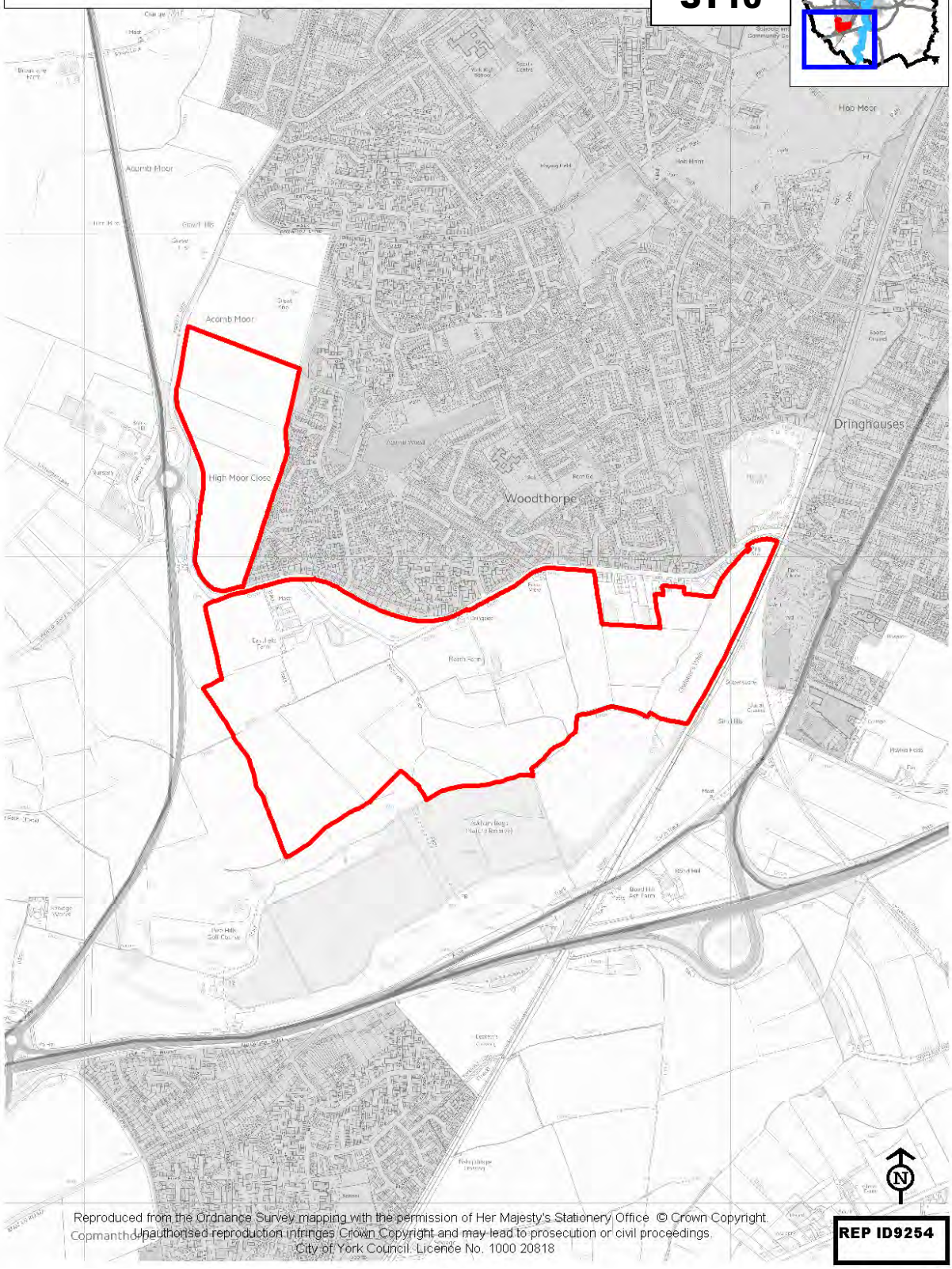
880: ST10 Alternative Boundary

SF12/ ST10



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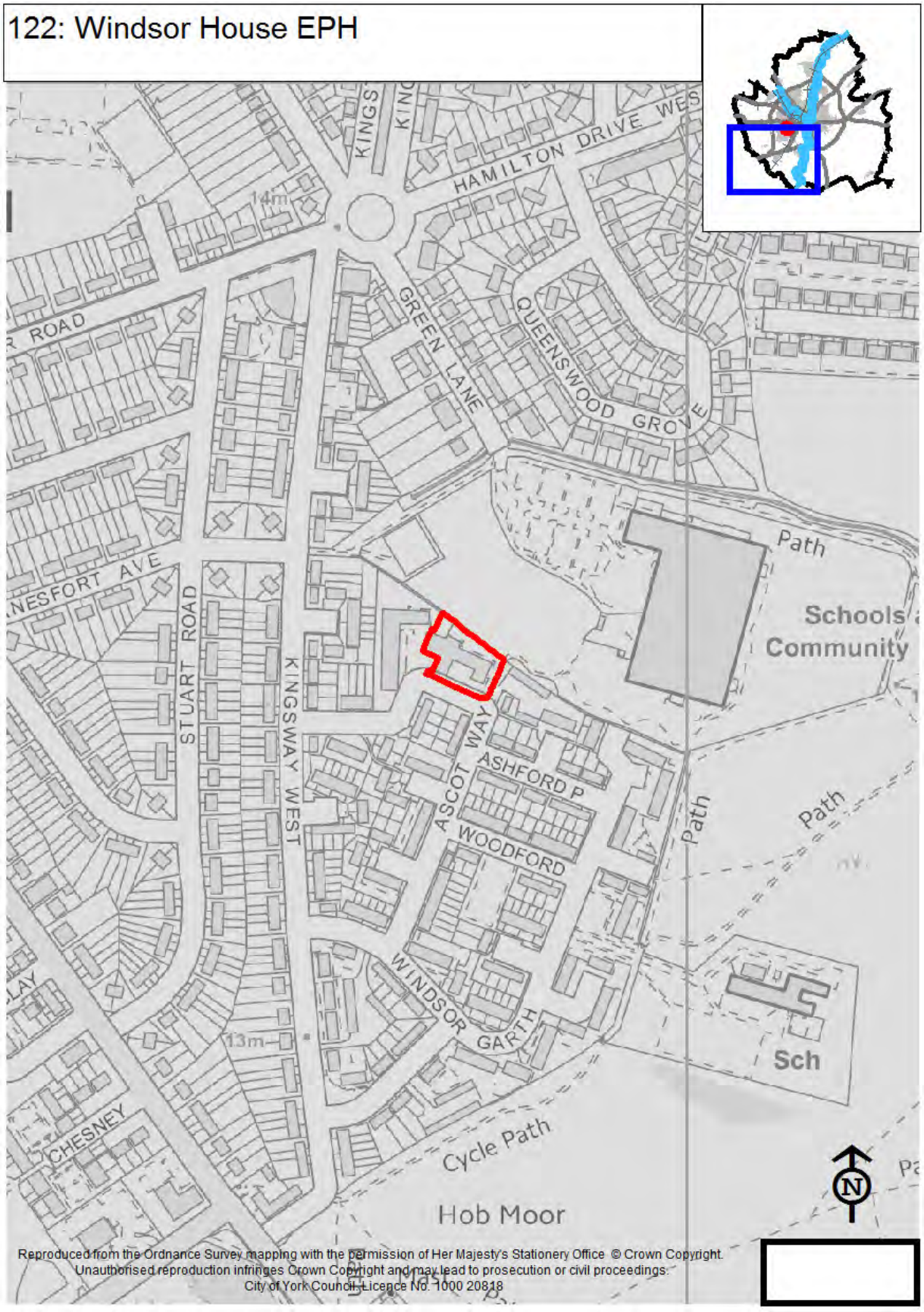
122: Windsor House EPH
HAMILTON DRIVE WEST
KINGS
KING
14m
GREEN LANE
QUEENSWOOD GROVE
ROAD
NESFORT AVE
STUART ROAD
KINGSWAY WEST
ASCOT WAY
ASHFORD P
WOODFORD
WINDSOR GARTH
13m
CHESNEY
Path
Schools
Community
Path
Path
Sch
Cycle Path
Hob Moor
N
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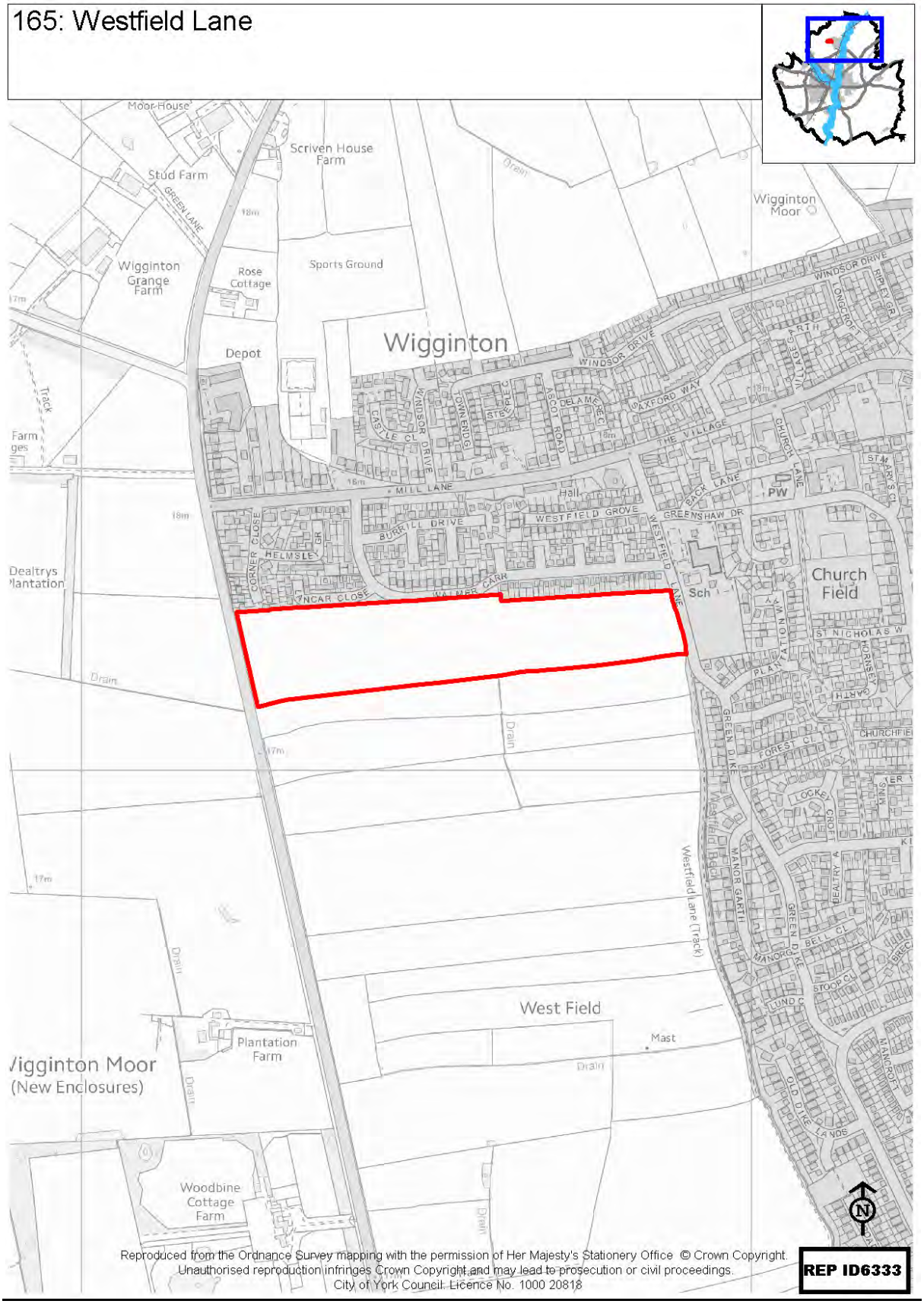

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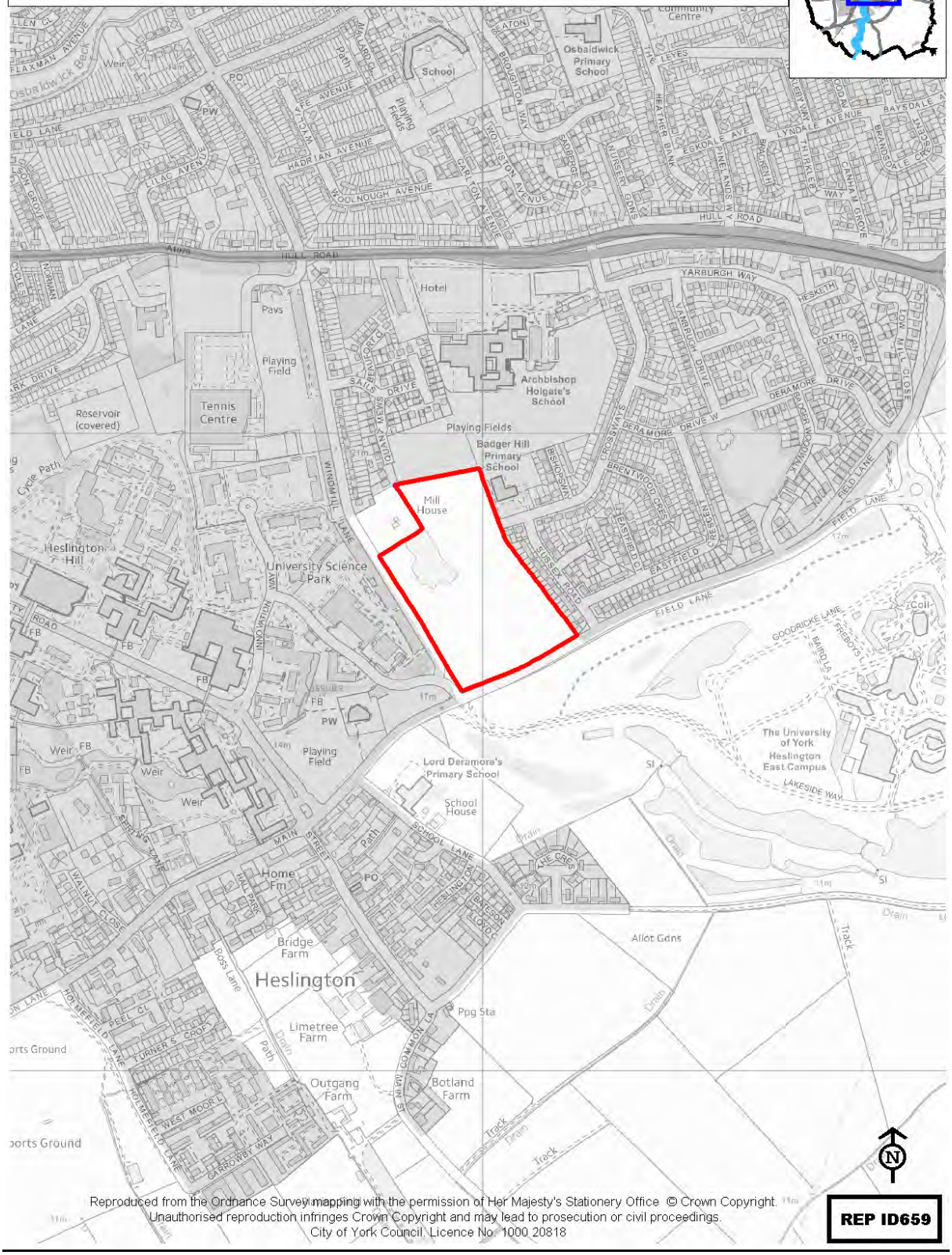
170: Pond Field



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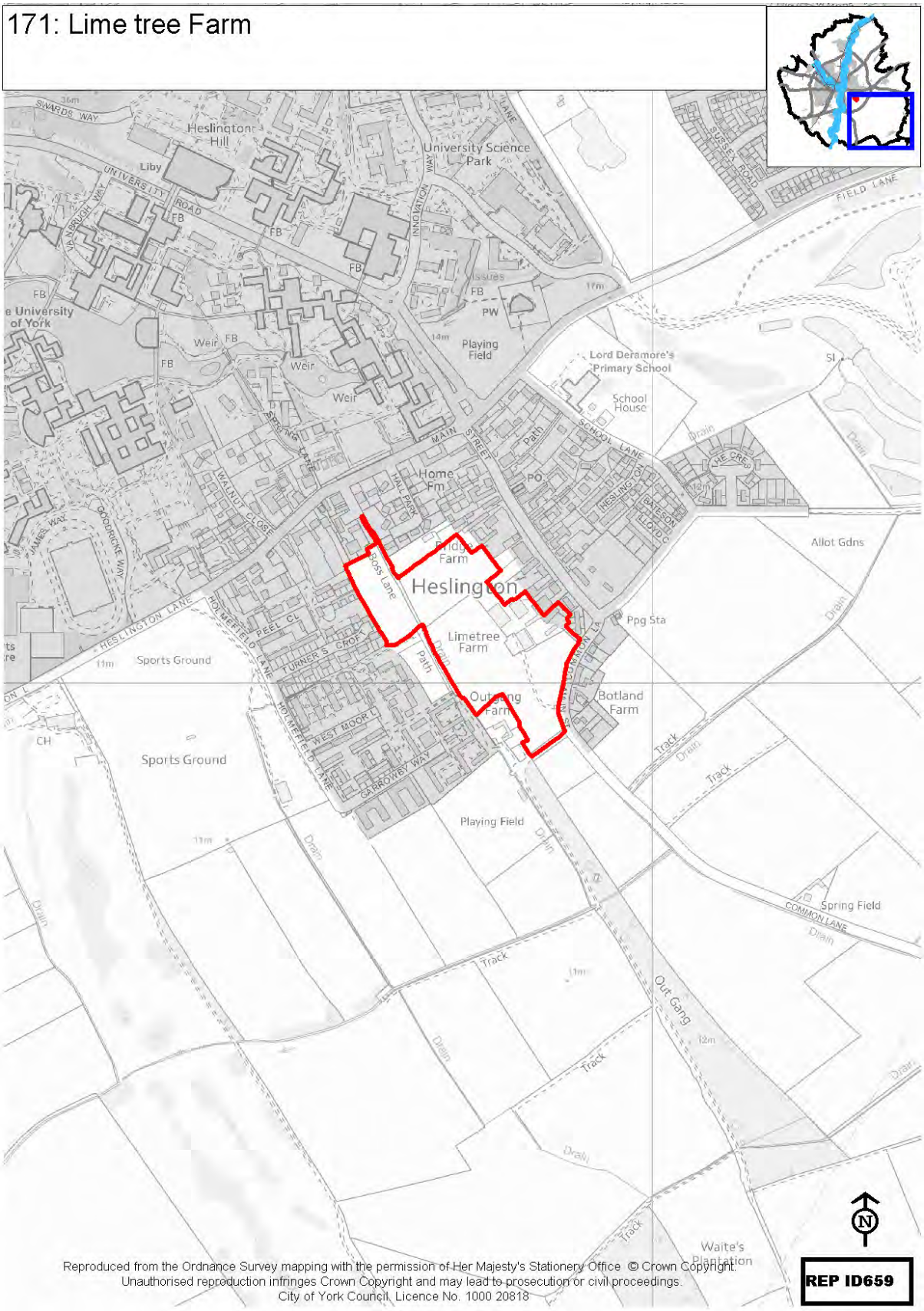
171: Lime tree Farm



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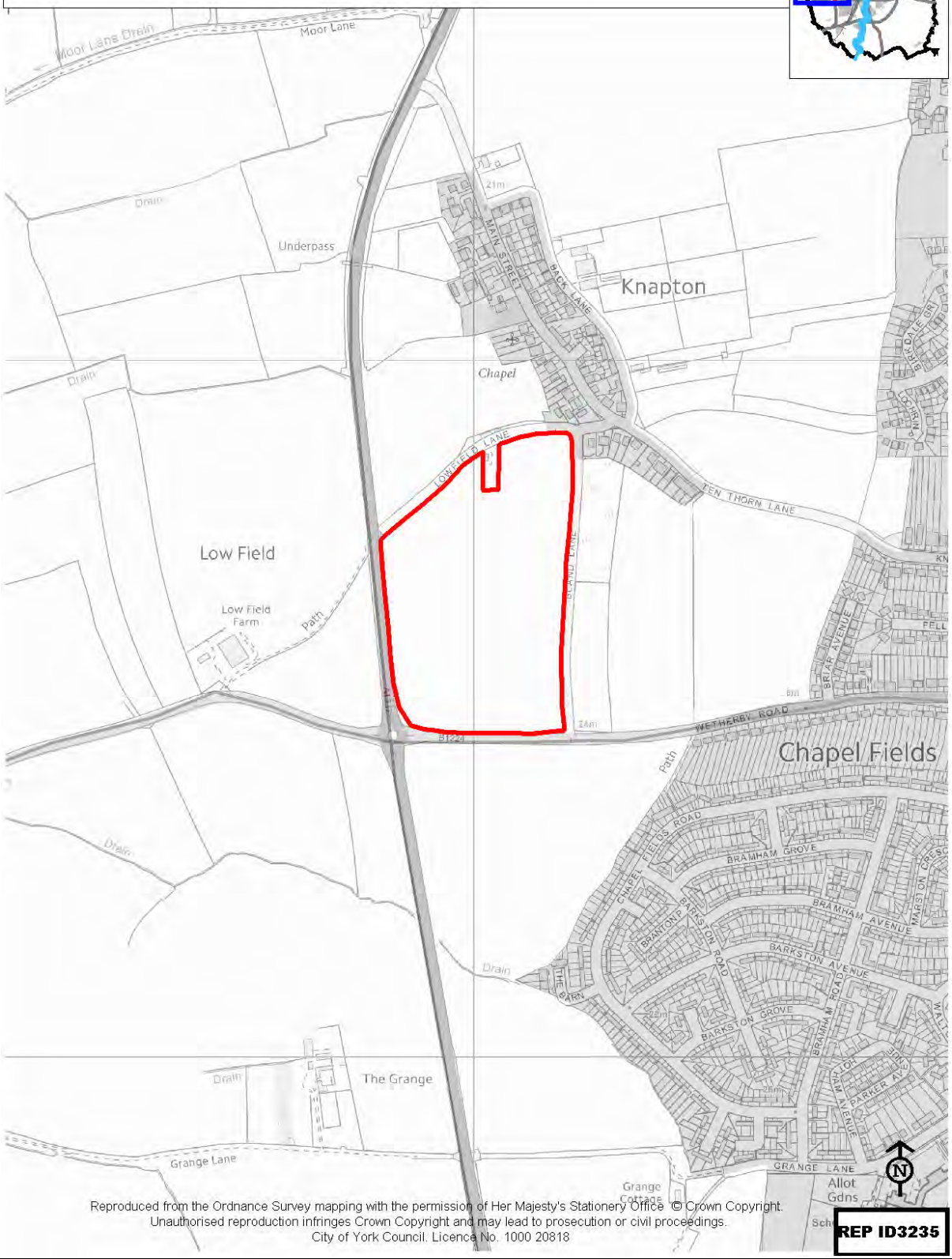
220: Land at Wetherby Road, Knapton



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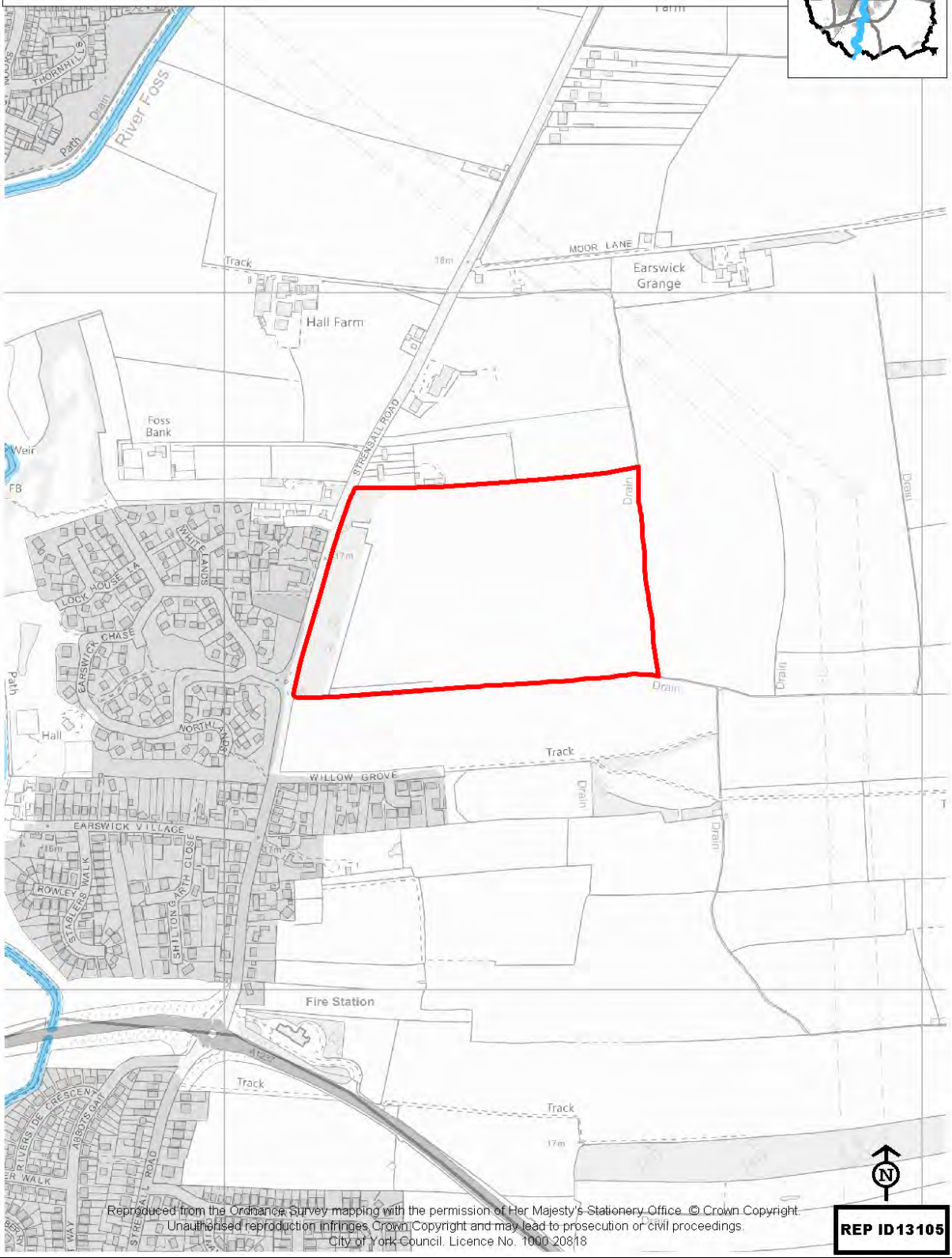
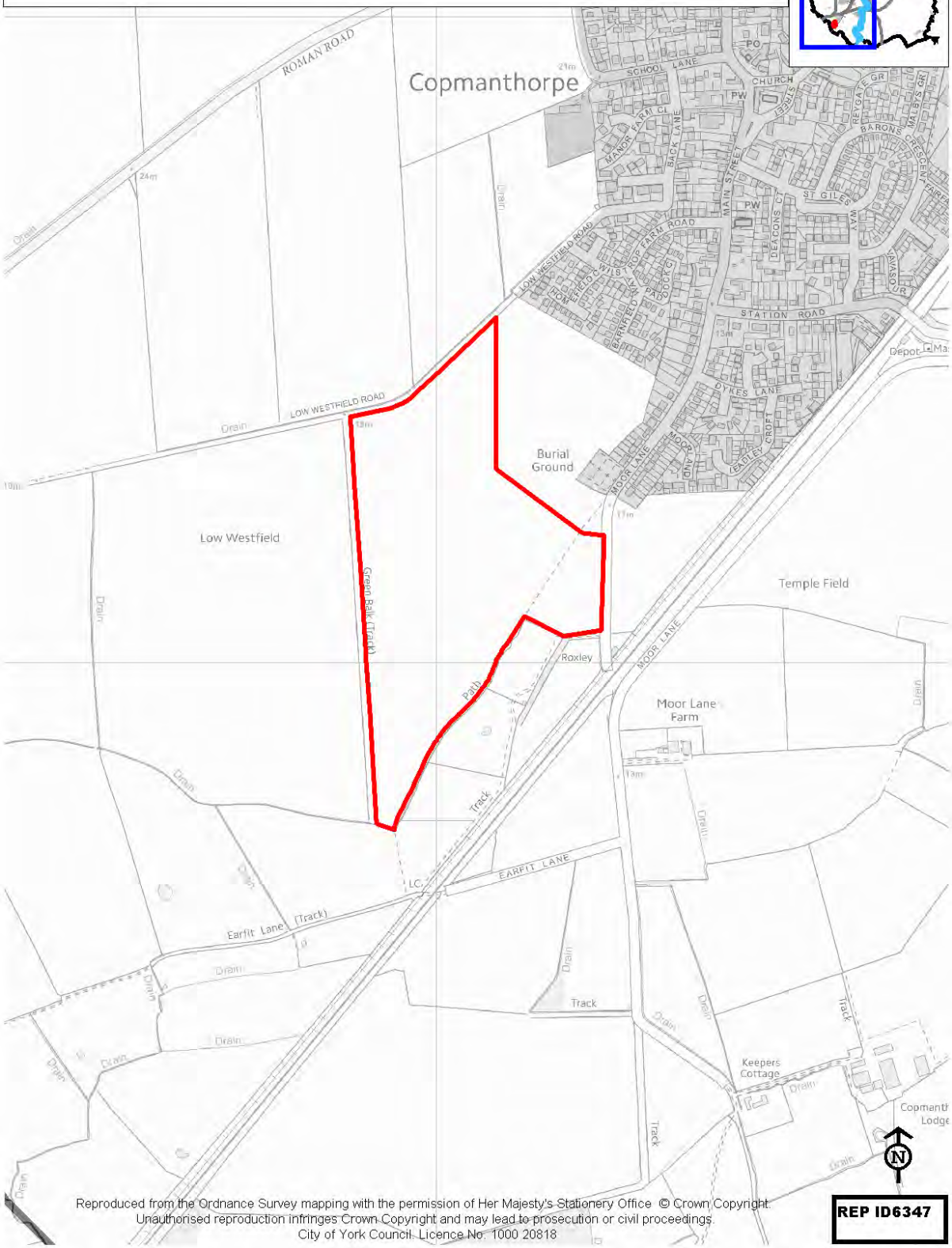
755: Land to the East Strensall Rd Earswick



768: Land to the West of Moor Lane, Copmanthorpe



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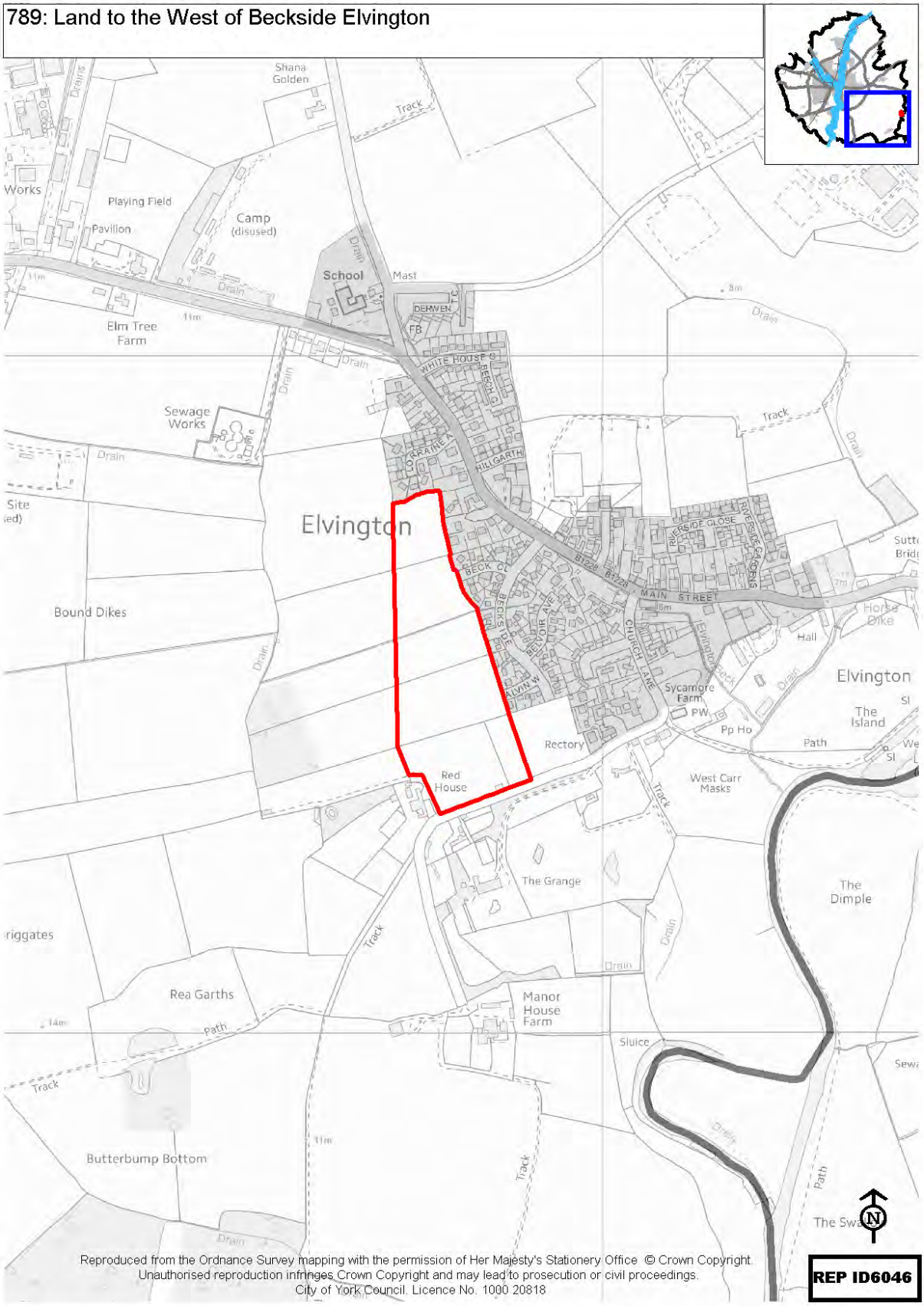
789: Land to the West of Beckside Elvington



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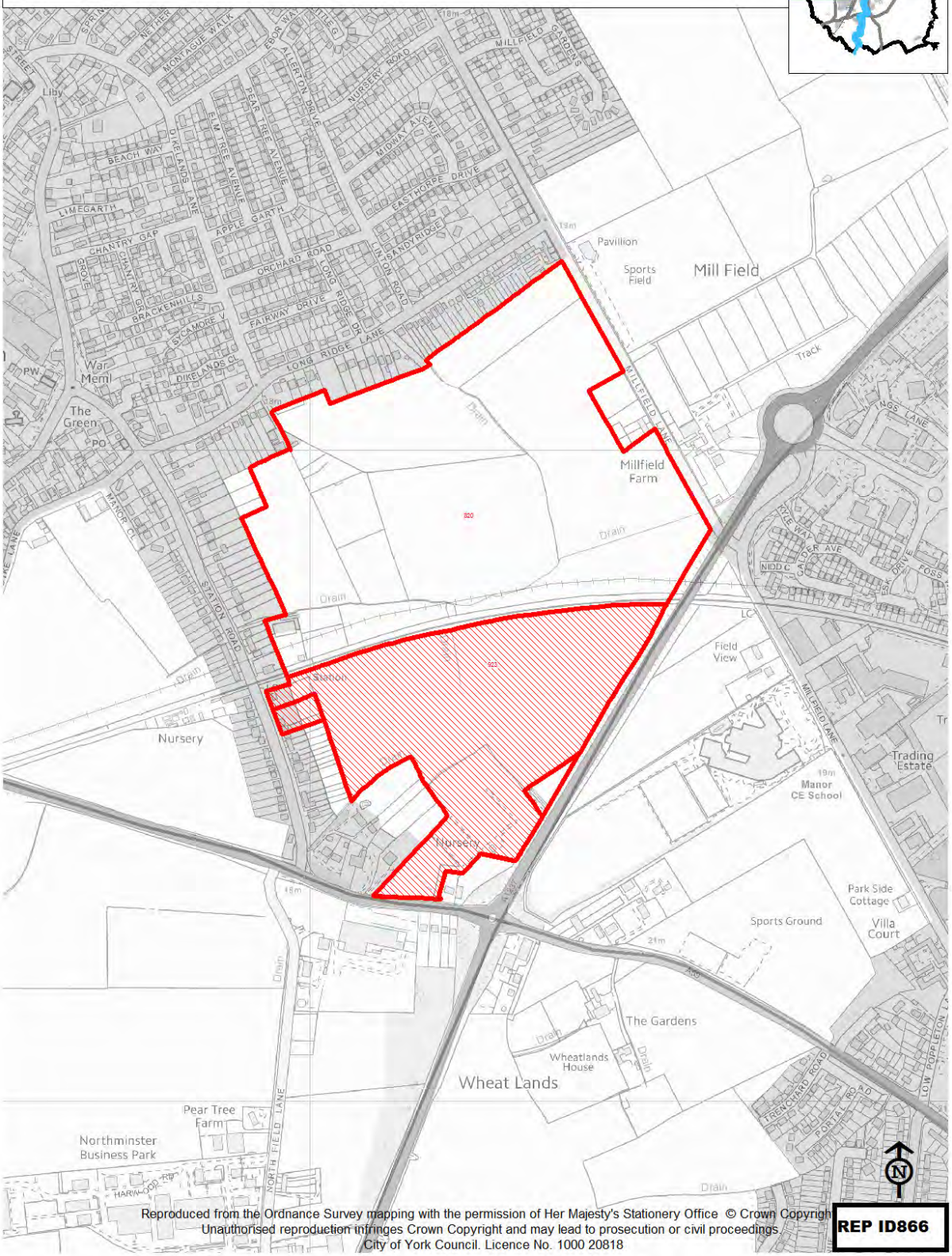
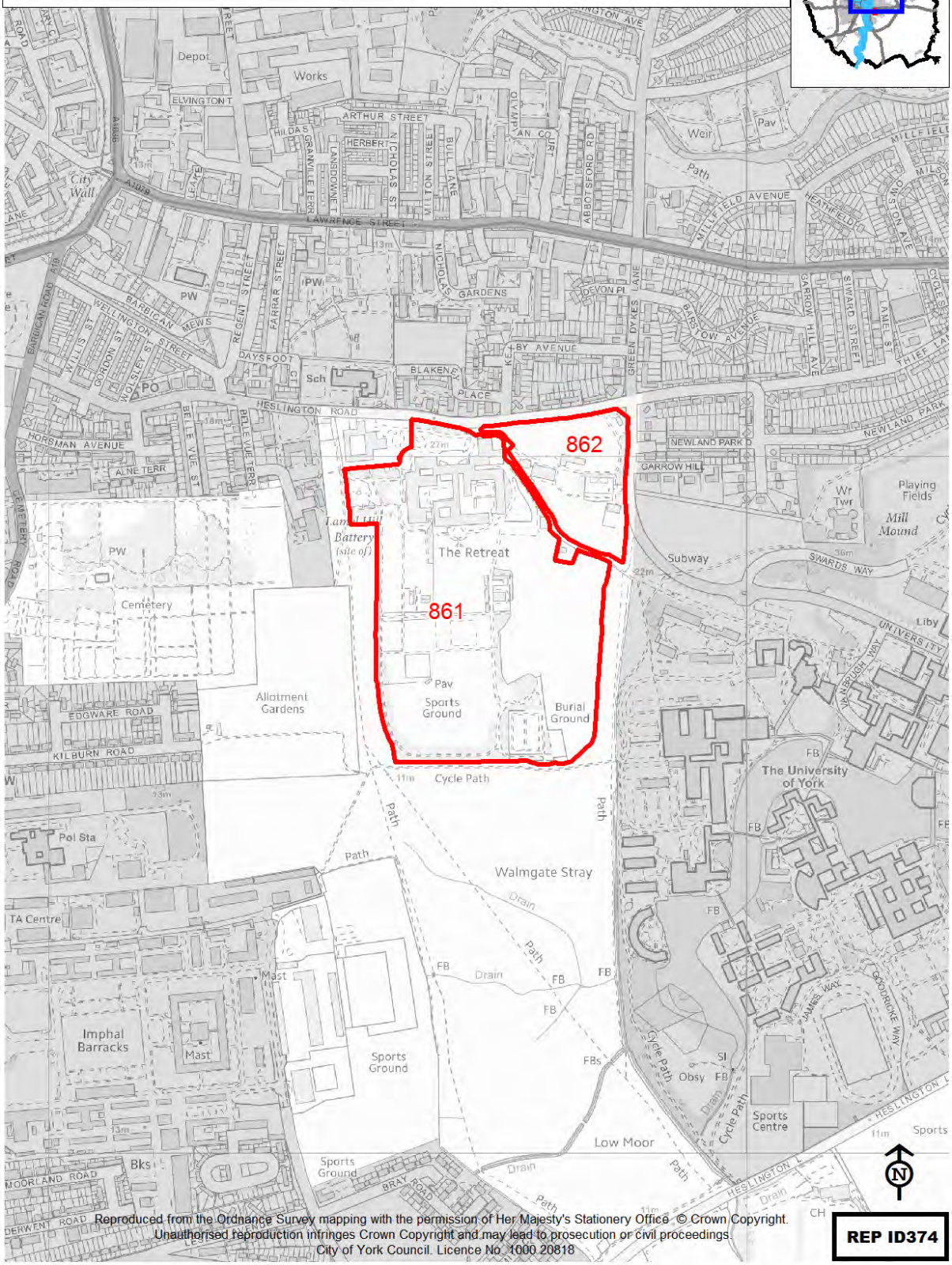
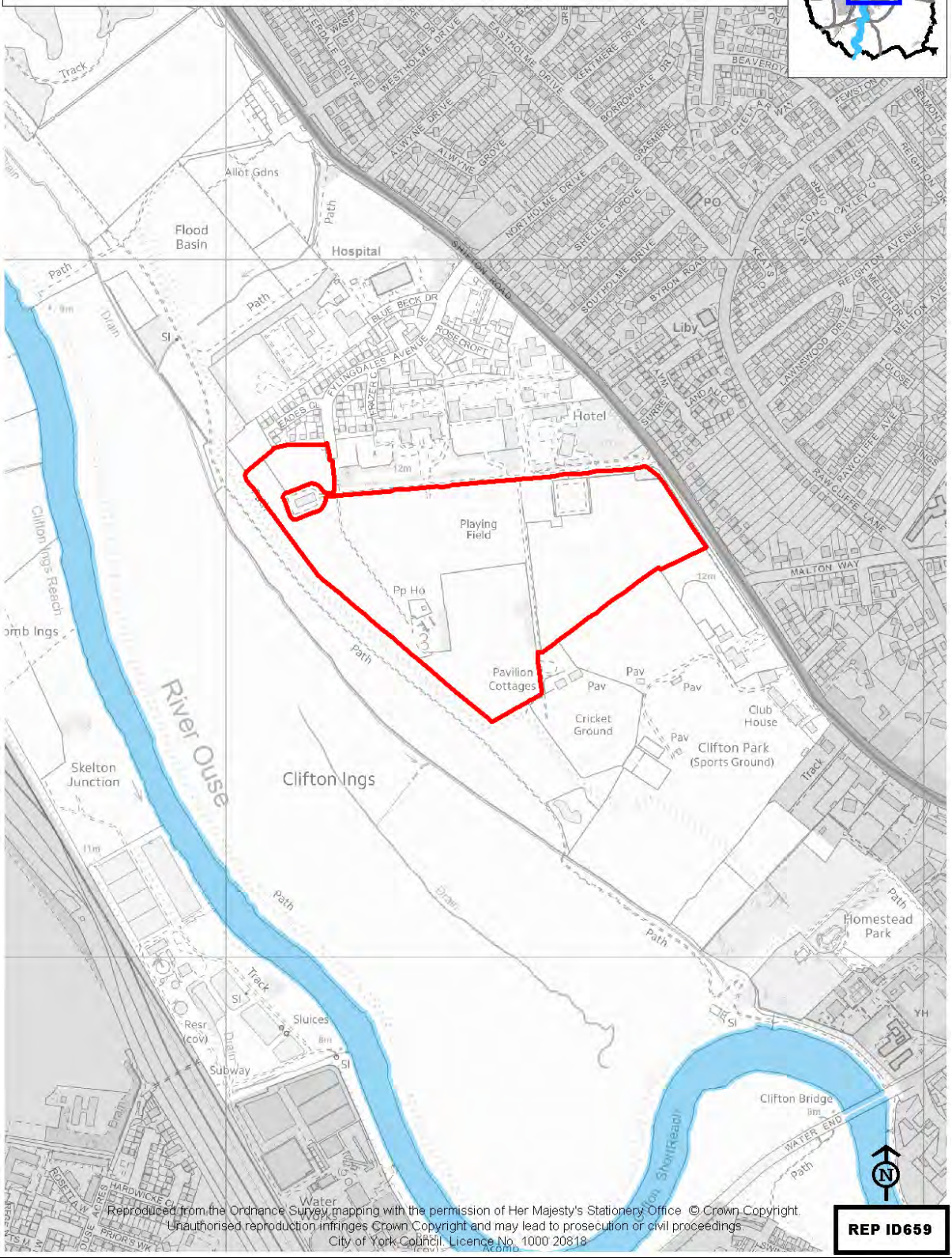
820/923: Between Poppleton and A1237

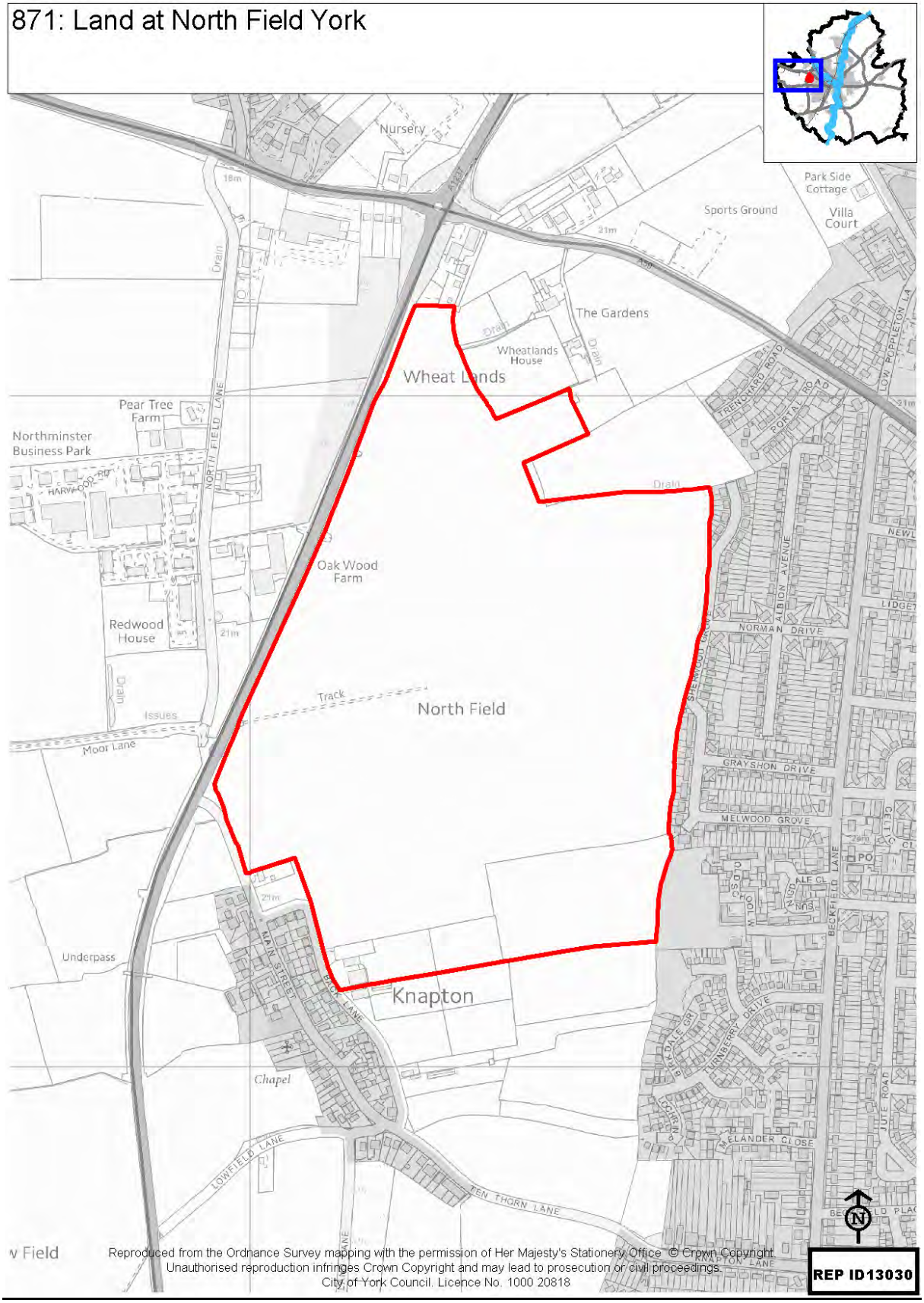


861 & 862 : Land at the Retreat



863: Land South and west of Clifton Park




871: Land at North Field York
Nursery
Park Side Cottage
Sports Ground
Villa Court
The Gardens
Wheatlands House
Wheat Lands
Pear Tree Farm
Northminster Business Park
Oak Wood Farm
Redwood House
Track
North Field
Issues
Moor Lane
Underpass
Knapton
Chapel
Drain
NORTH FIELD LANE
LOW POPPLETON LANE
ALBION AVENUE
NORMAN DRIVE
GRAYSHON DRIVE
MELWOOD GROVE
BECKFIELD LANE
MAIN STREET
BACK LANE
LOWFIELD LANE
TEN THORN LANE
JUTE ROAD
ELANDER CLOSE
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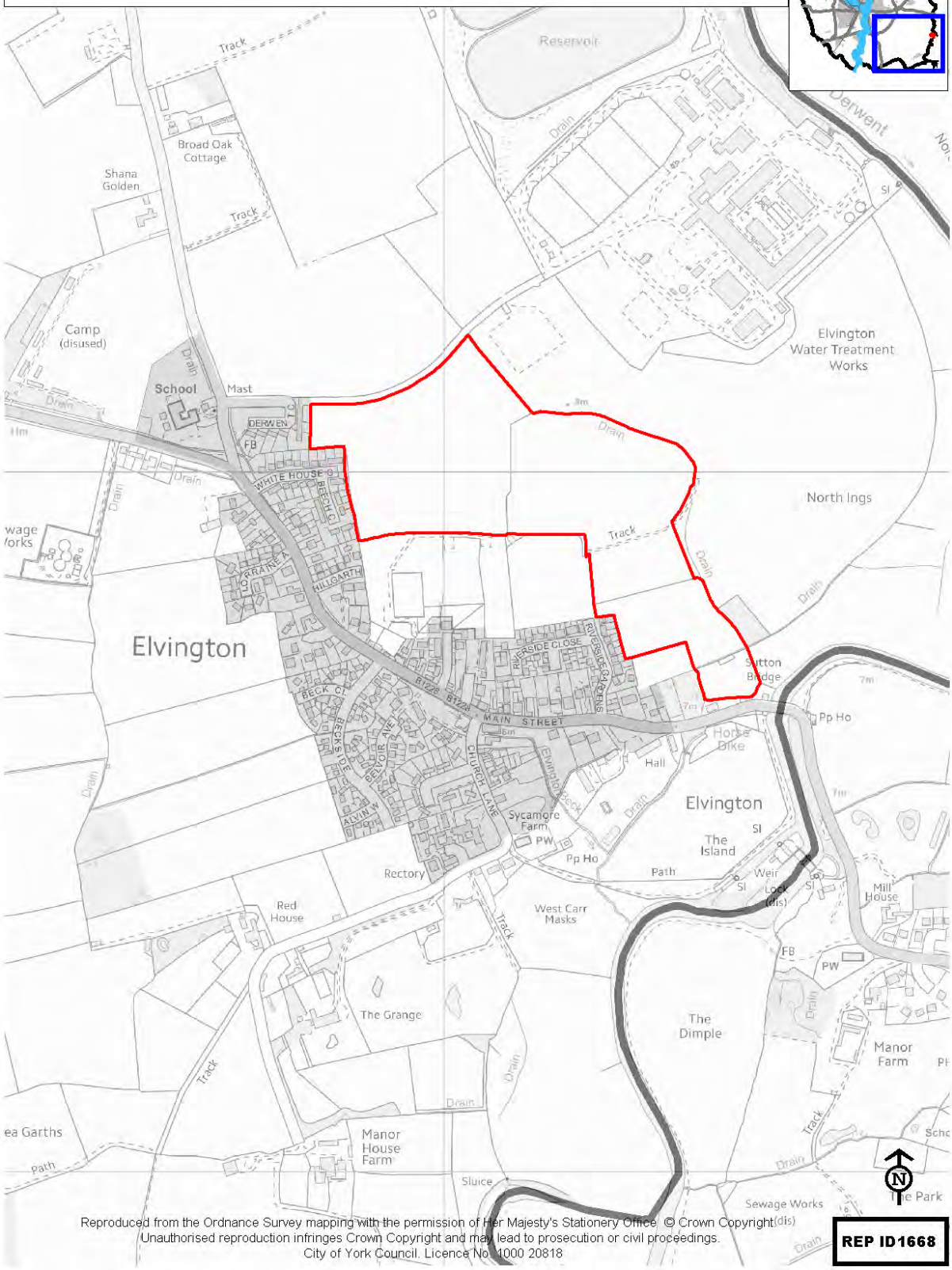
REP ID13030

875: Land beyond Riverside Gardens



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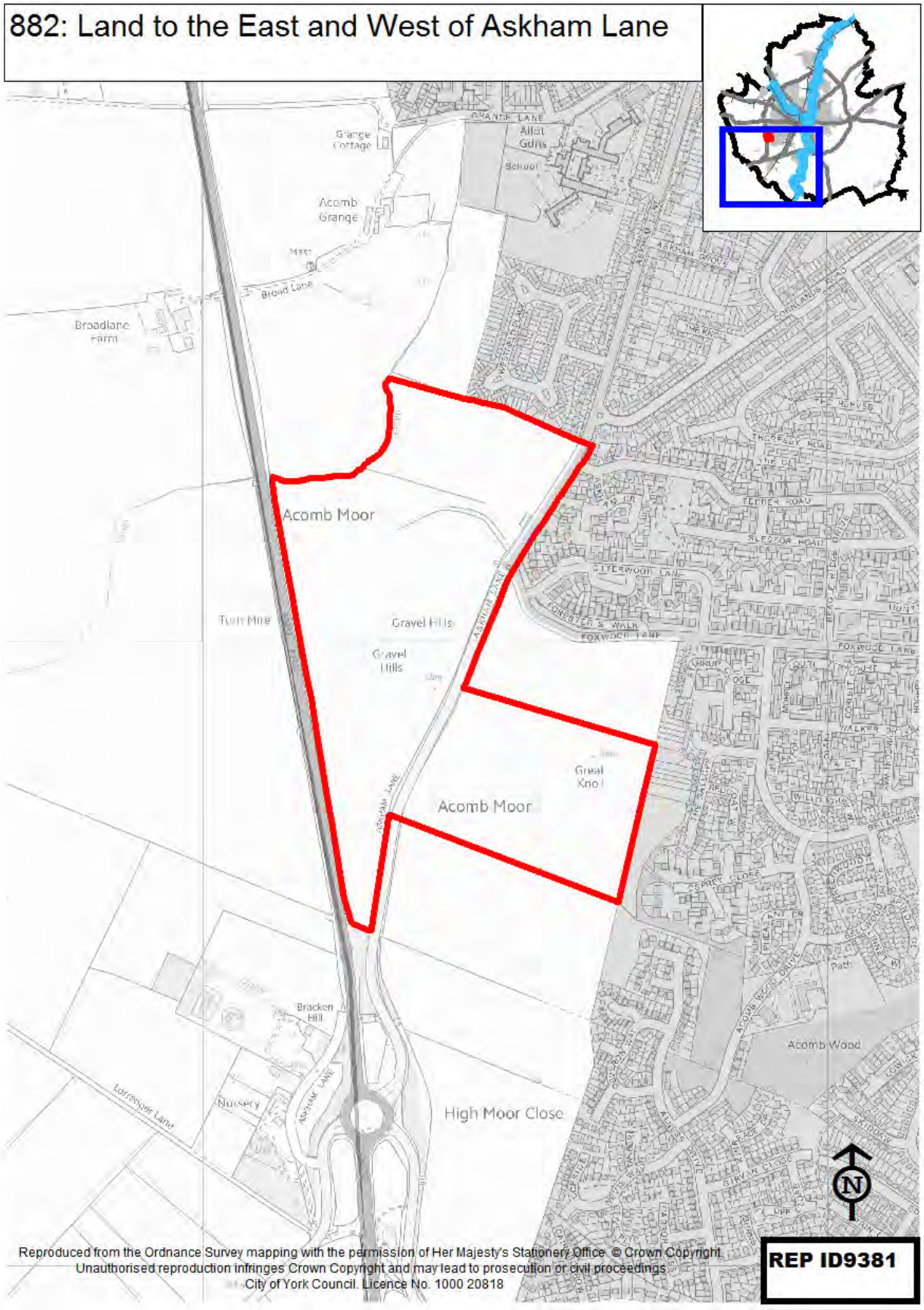
882: Land to the East and West of Askham Lane
Acomb Moor
Acomb Moor
Gravel Hills
Gravel Hills
Great Knoll
High Moor Close
Acomb Wood
Bracken Hill
Nursery
Broadlane Farm
Acomb Grange
Grange Cottage
Allot Gdns
School
Broad Lane
Tum Mire
Askham Lane
Lofthouse Lane
Foxwood Lane
Foresters Walk
Clifton Moor
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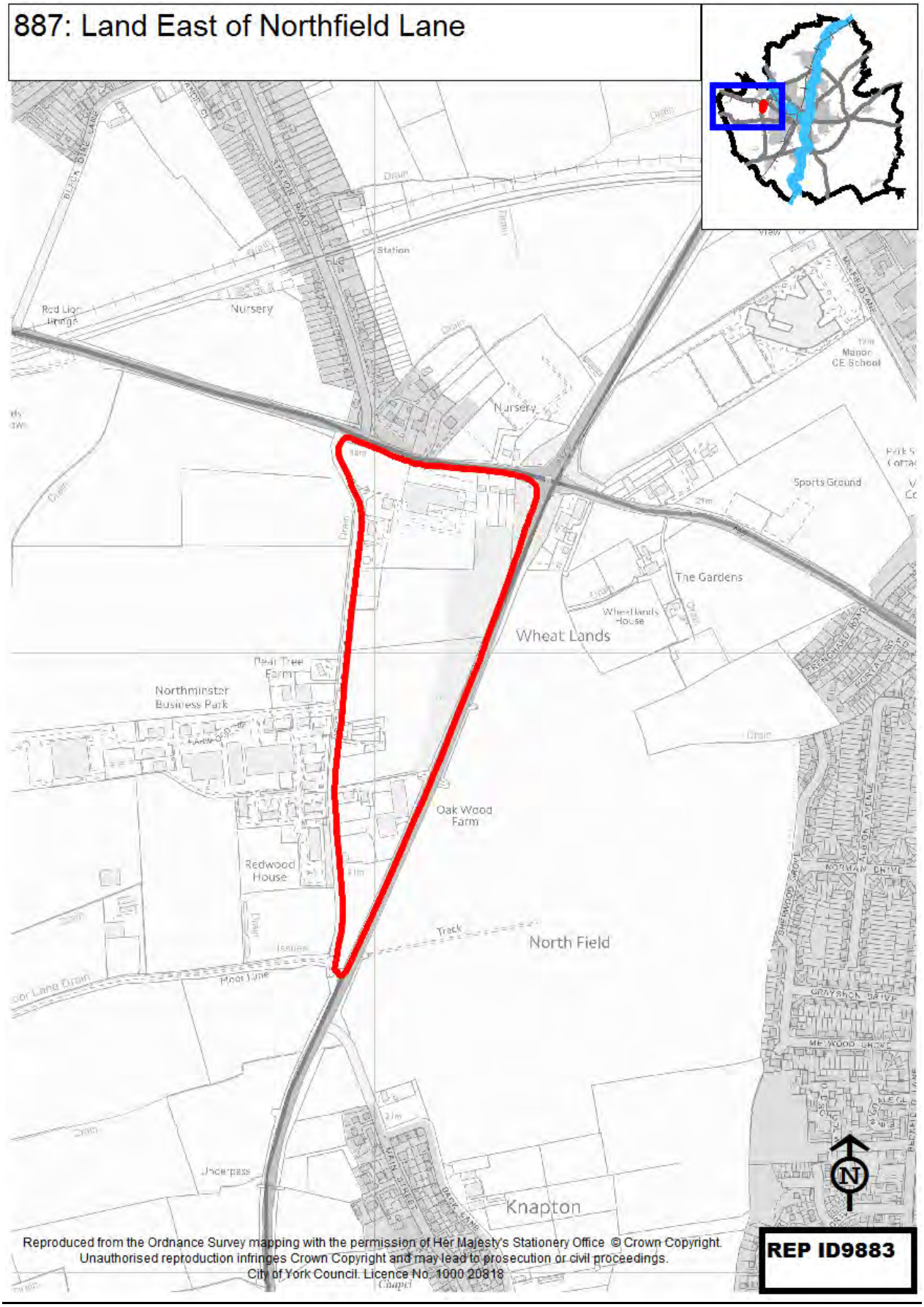
887: Land East of Northfield Lane
Nursery
Station
Nursery
Manor CE School
Sports Ground
The Gardens
Wheat Lands
Northminster Business Park
Oak Wood Farm
Redwood House
North Field
Knapton
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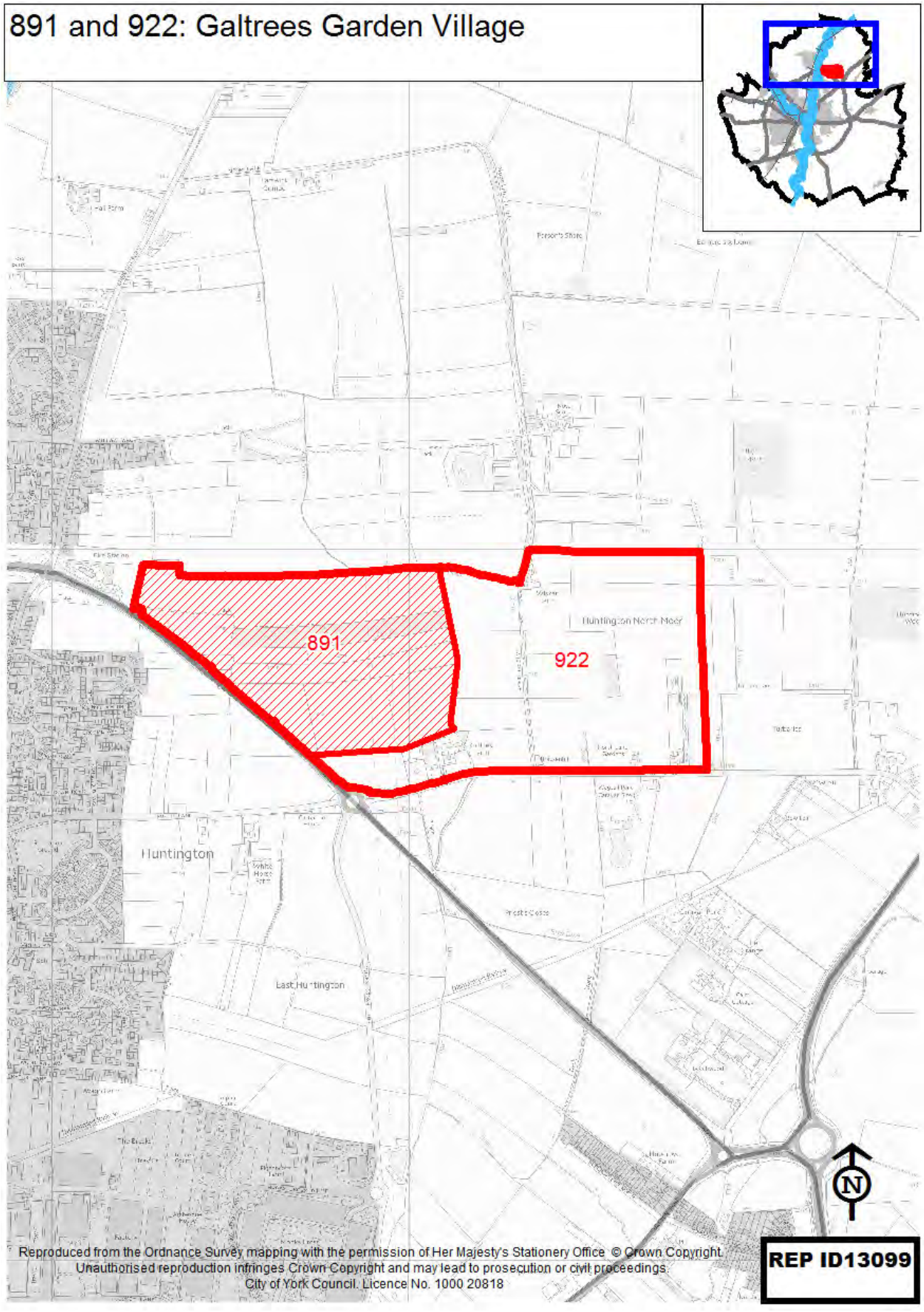
891 and 922: Galtrees Garden Village
891
922
Huntington
Huntington North Moor
East Huntington
N
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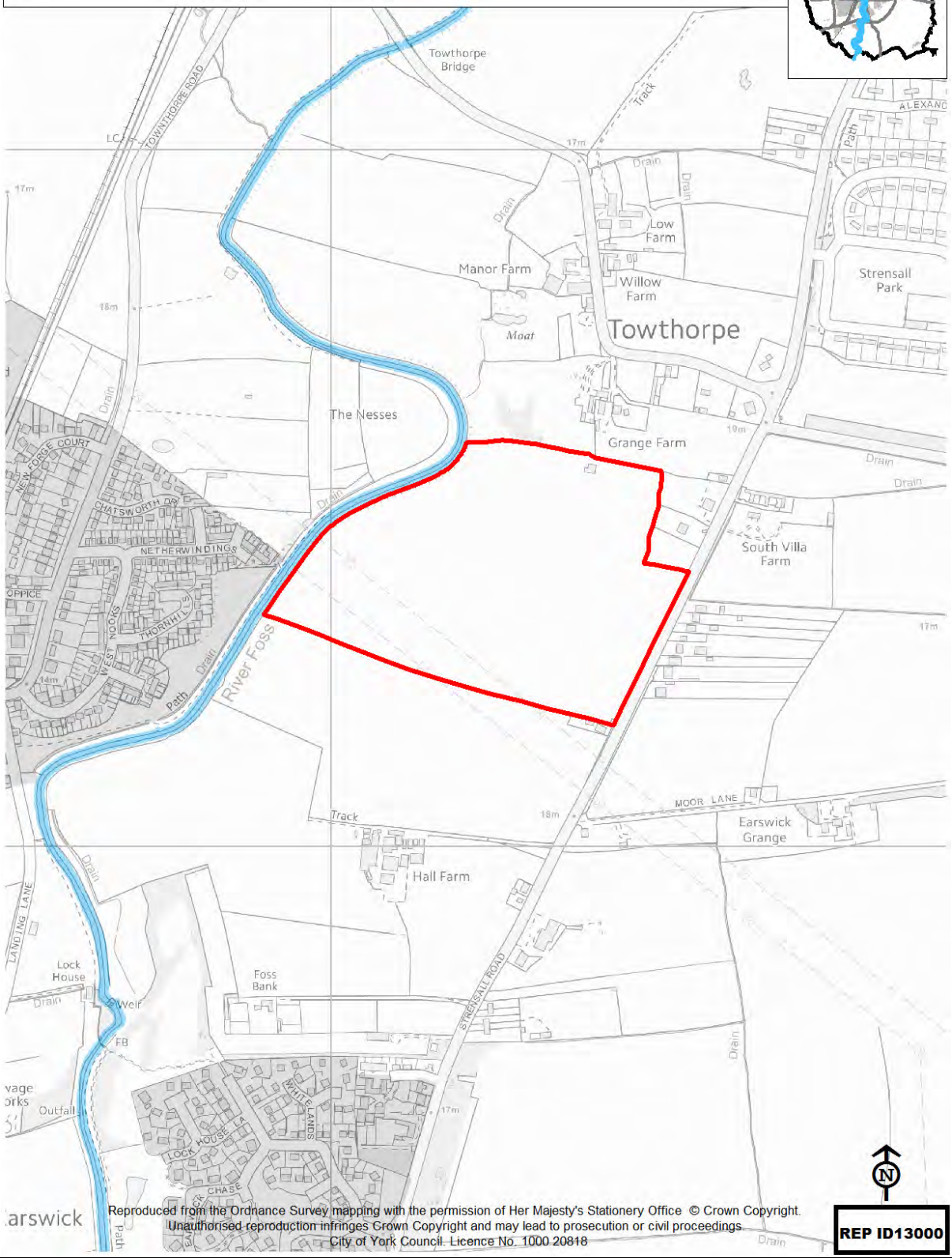
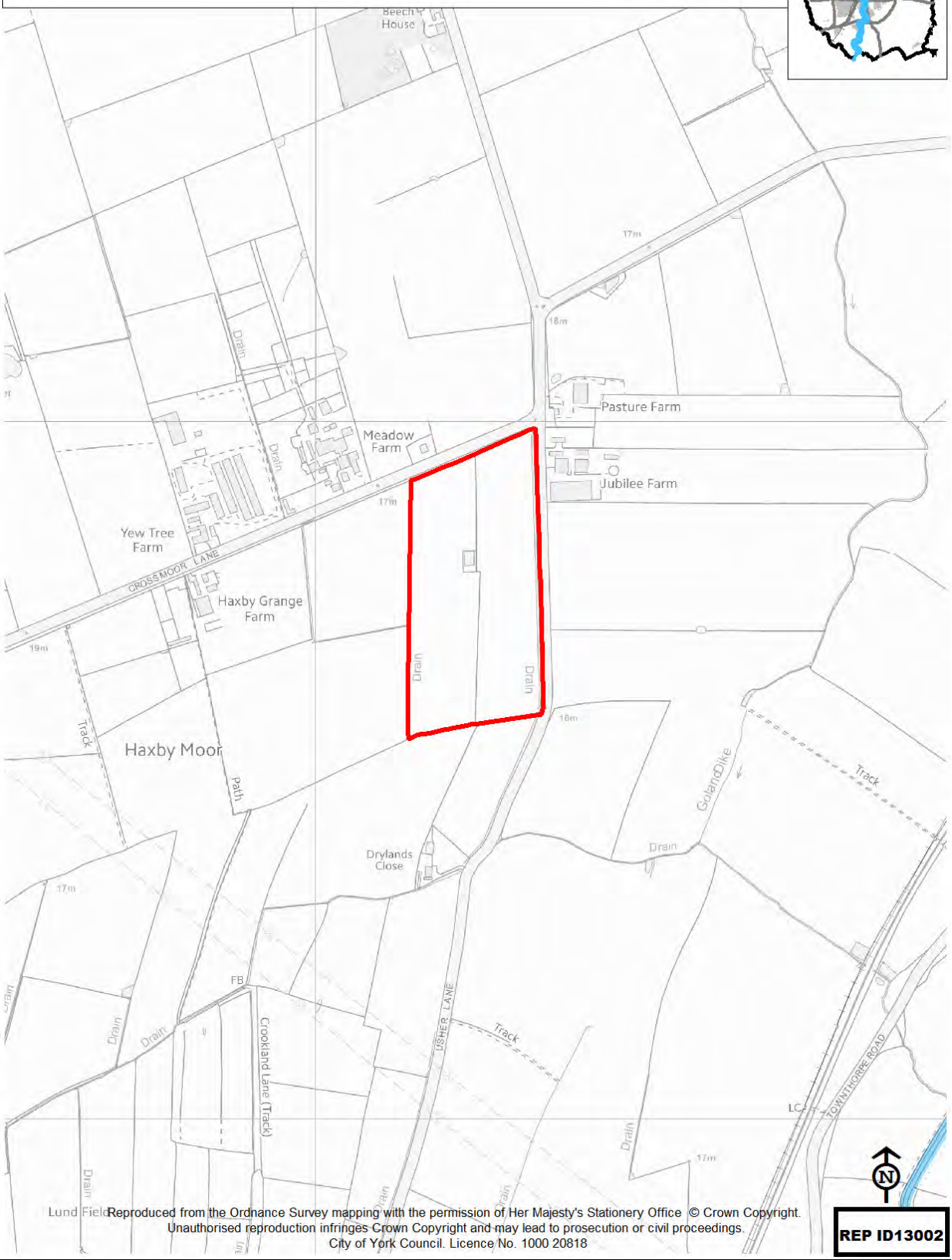
892: Land at Grange Farm Strensall Road



894: Land at Crossmoor Lane and Usher Lane Haxby



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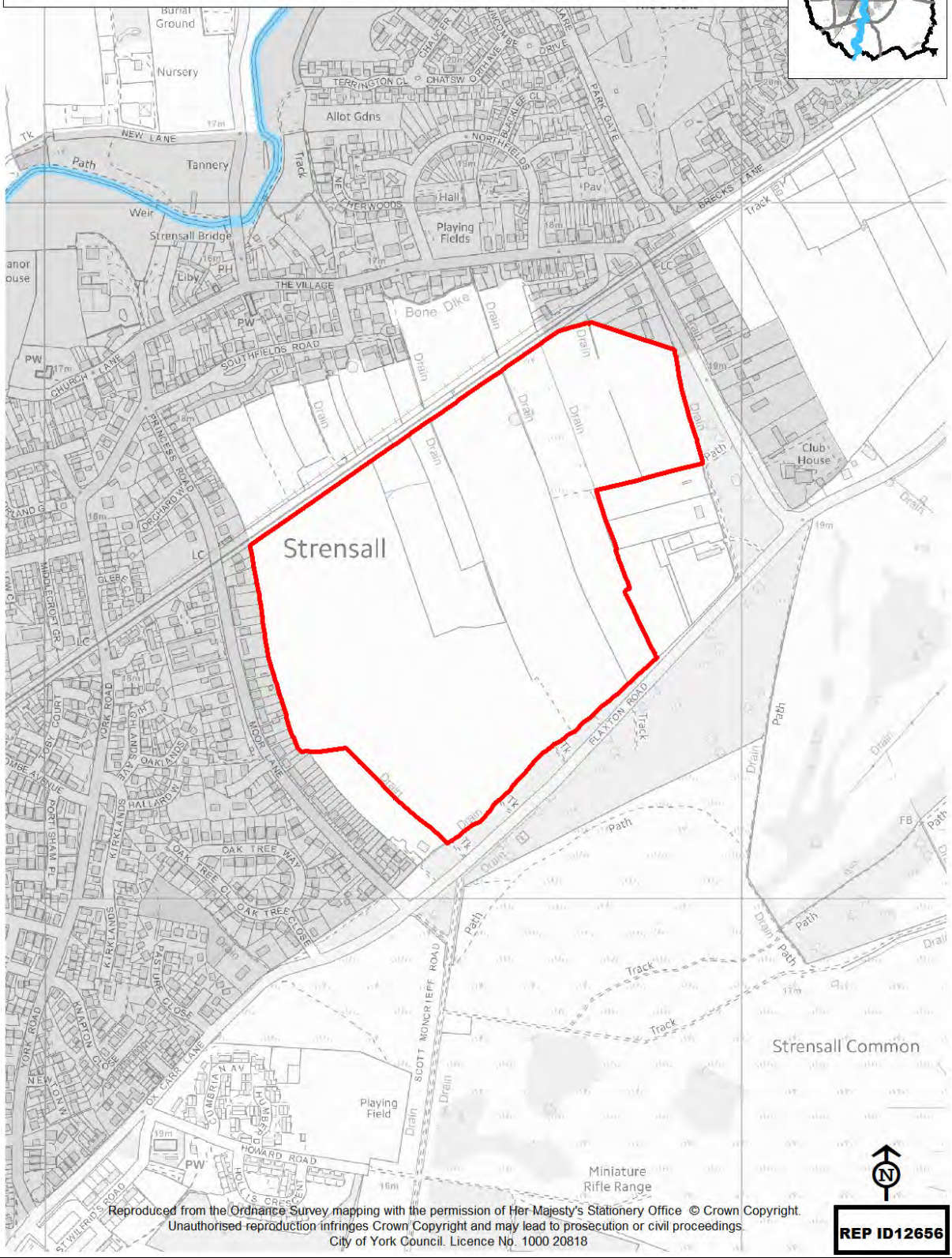
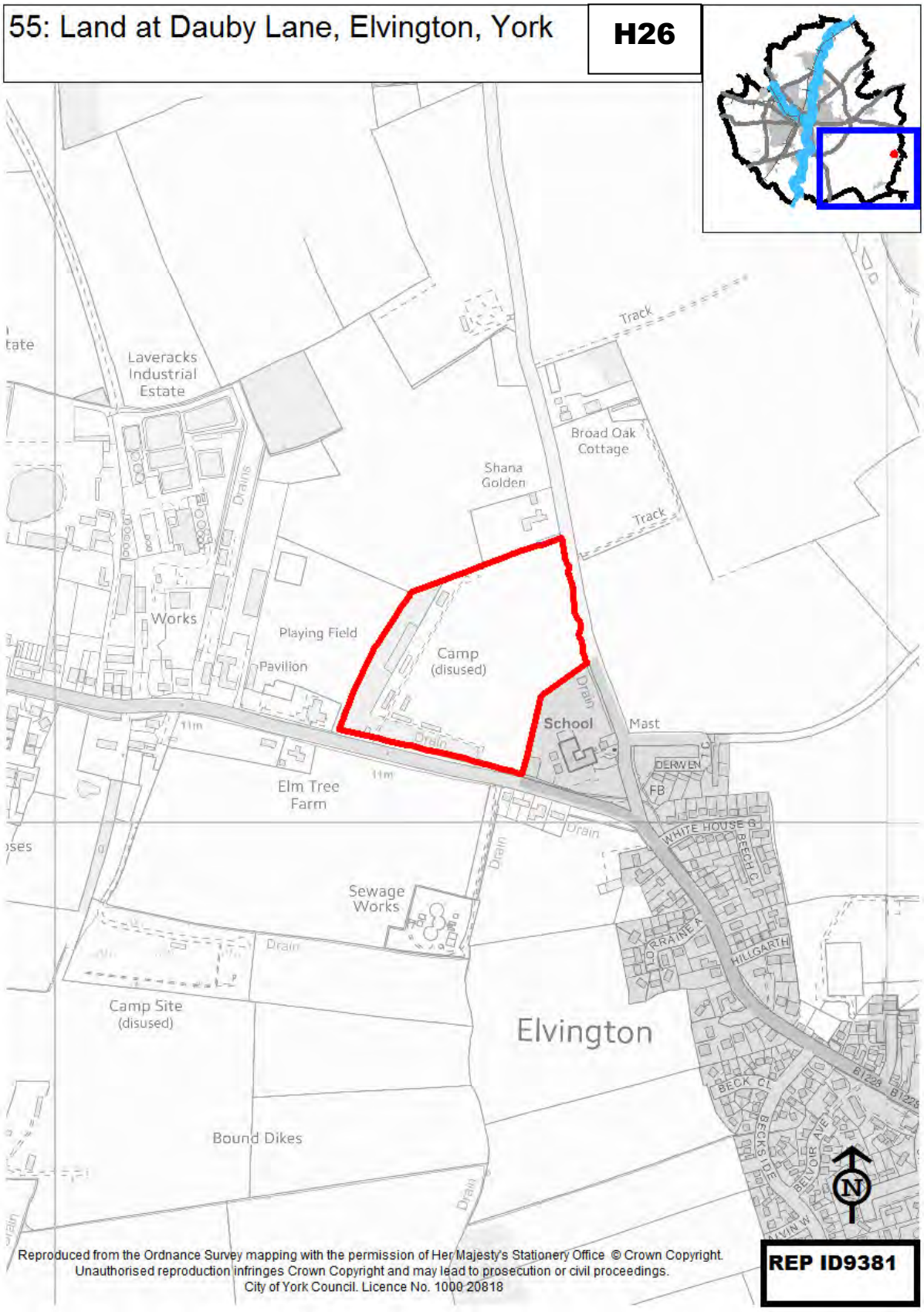
902: Land South of Strensall Village




55: Land at Dauby Lane, Elvington, York
H26
Laveracks Industrial Estate
Track
Broad Oak Cottage
Shana Golden
Track
Drains
Works
Playing Field
Pavilion
Camp (disused)
Drain
School
Mast
Drain
11m
11m
Elm Tree Farm
DERWEN
FB
WHITE HOUSE G
BEECH G
Drain
Drain
Sewage Works
LORRAINE A
HILLGARTH
Drain
Camp Site (disused)
Elvington
BECK CI
B1228
B1228
BECKSIDE
BELVOR AVE
Bound Dikes
Drain
N
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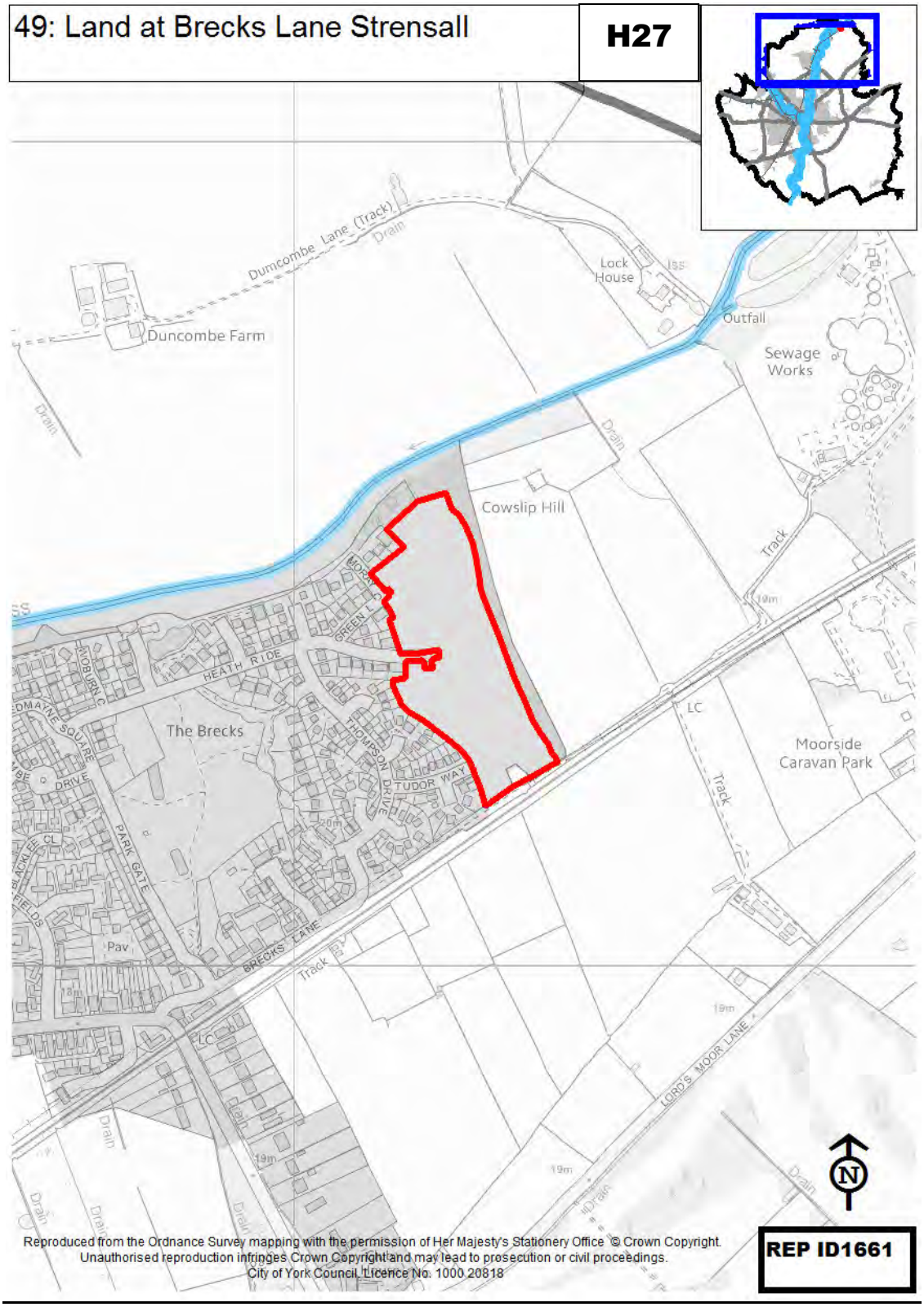
49: Land at Brecks Lane Strensall
H27
Duncombe Lane (Track)
Drain
Duncombe Farm
Lock House
Outfall
Sewage Works
Cowslip Hill
Track
The Brecks
Moorside Caravan Park
LC
BRECKS LANE
LORD'S MOOR LANE
N
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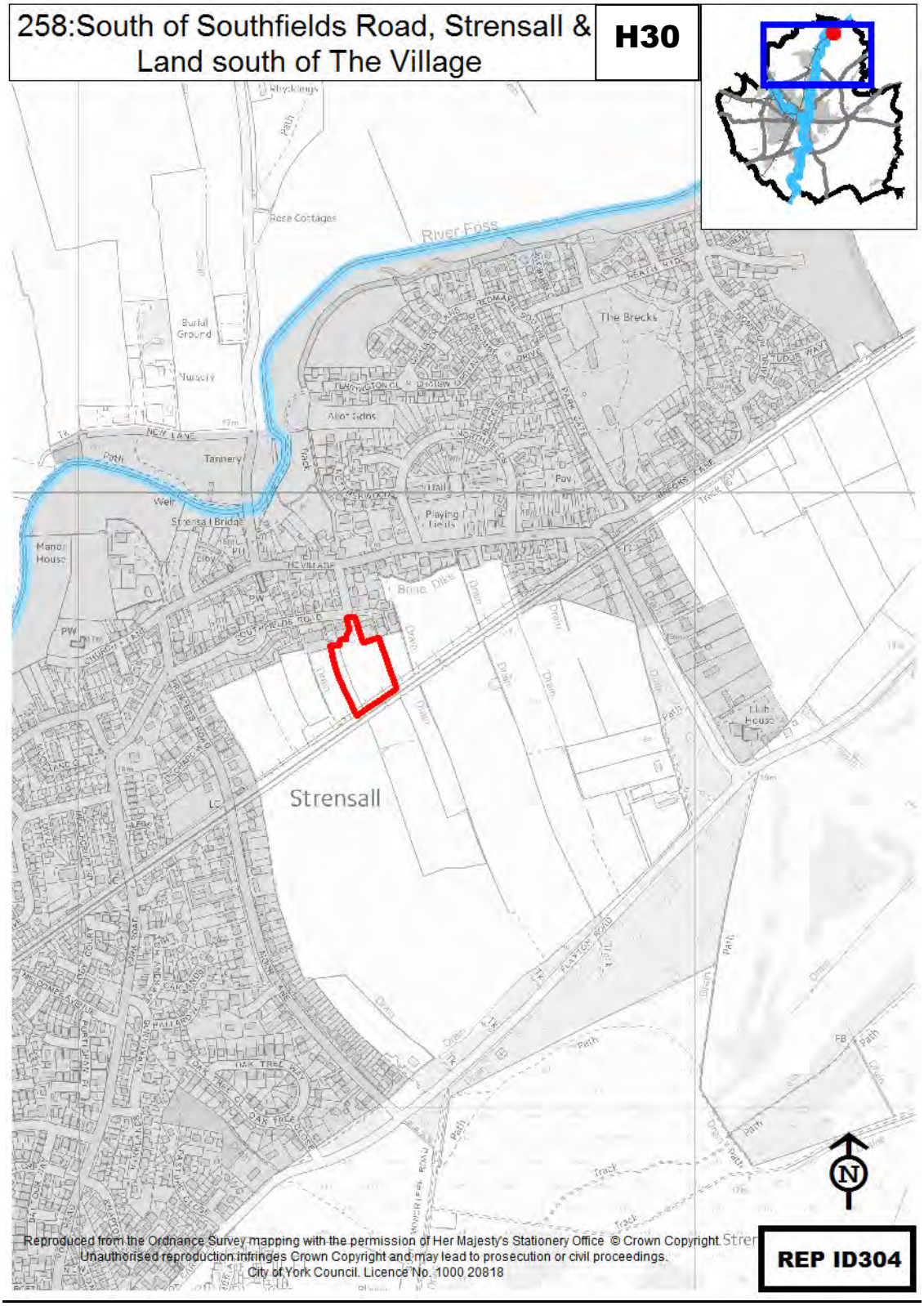
258:South of Southfields Road, Strensall & Land south of The Village
H30
River Foss
Rose Cottages
Build Ground
Nursery
The Brecks
Tannery
Weir
Strensall Bridge
Manor House
Playing Fields
Bone Dike
Strensall
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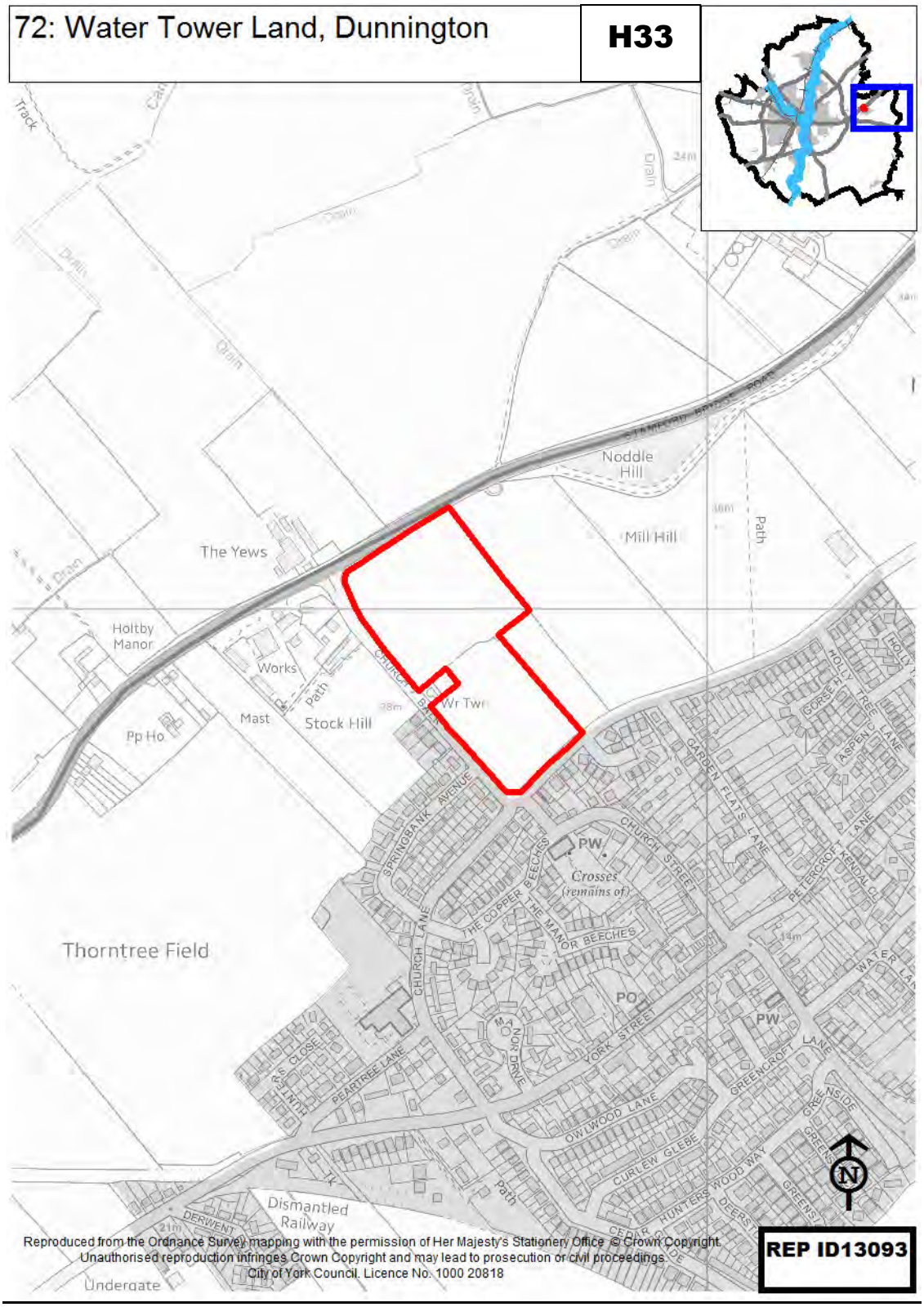
72: Water Tower Land, Dunningon
H33
Noddle Hill
Mill Hill
The Yews
Holtby Manor
Works
Mast
Stock Hill
Pp Ho
Thorntree Field
Crosses (remains of)
PW
PO
Dismantled Railway
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903: Land North of Church Lane, Skelton
H34
New Farm Cottages
Field
New Farm
13m
Drain
Drain
Track
Spring Hill Farm
Skelton Hall
PW
21m
CHURCH LANE
ST GILES ROAD
THE VILLAGE
19m
Hall
PH
PASTURE CLOSE
THE VALE
ARTHUR PL
GRANGE CLOSE
FAIRFIELDS DRIVE
Drain
STRIPE LANE
13m
Toll Bar Cott
Skelton Nurseries
Golf
N
REP ID 12560
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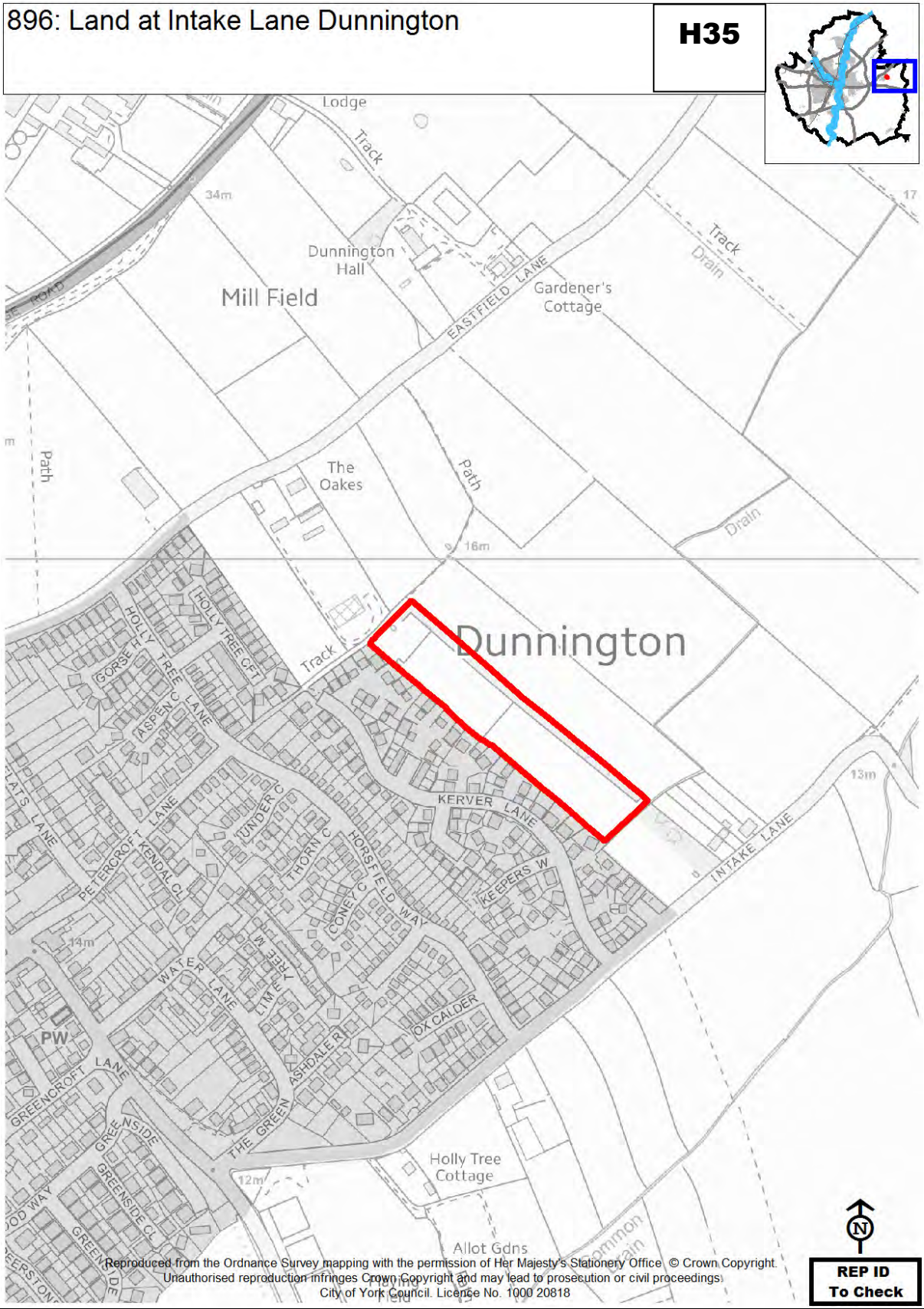
896: Land at Intake Lane Dunnington
H35
Lodge
Track
34m
Dunnington Hall
Mill Field
EASTFIELD LANE
Gardener's Cottage
Track
Drain
17
Path
The Oakes
Path
Drain
16m
Track
Dunnington
HOLLY TREE GORSE H
HOLLY TREE CFT
ASPEN C
LANE
KERVER LANE
INTAKE LANE
13m
UNDER C
THORN C
HORSFIELD WAY
KEEPERS W
KENDAL CL
PETERCROFT LANE
CONEY C
14m
WATER LANE
LIMETREE W
OX CALDER
PW
ASHDALE R
GREENCROFT LANE
THE GREEN
GREENSIDE
GREENSIDE CL
12m
Holly Tree Cottage
Allot Gdns
N
REP ID
To Check
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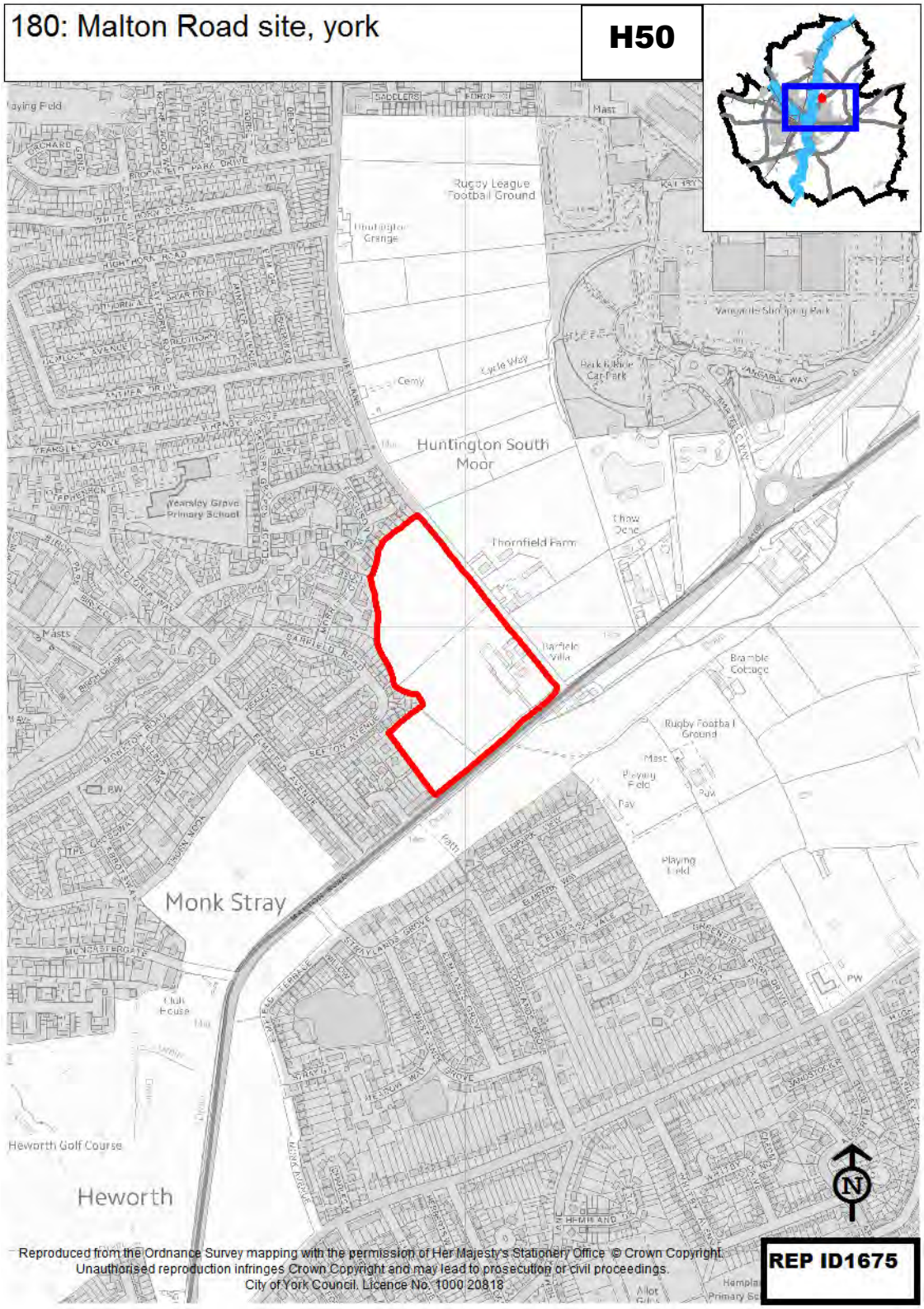
180: Malton Road site, york
H50
Rugby League Football Ground
Huntington Grange
Huntington South Moor
Yearsley Grove Primary School
Thornfield Farm
Thaw Dene
Barfield Villa
Bramble Cottage
Rugby Football Ground
Playing Field
Monk Stray
Heworth Golf Course
Heworth
N
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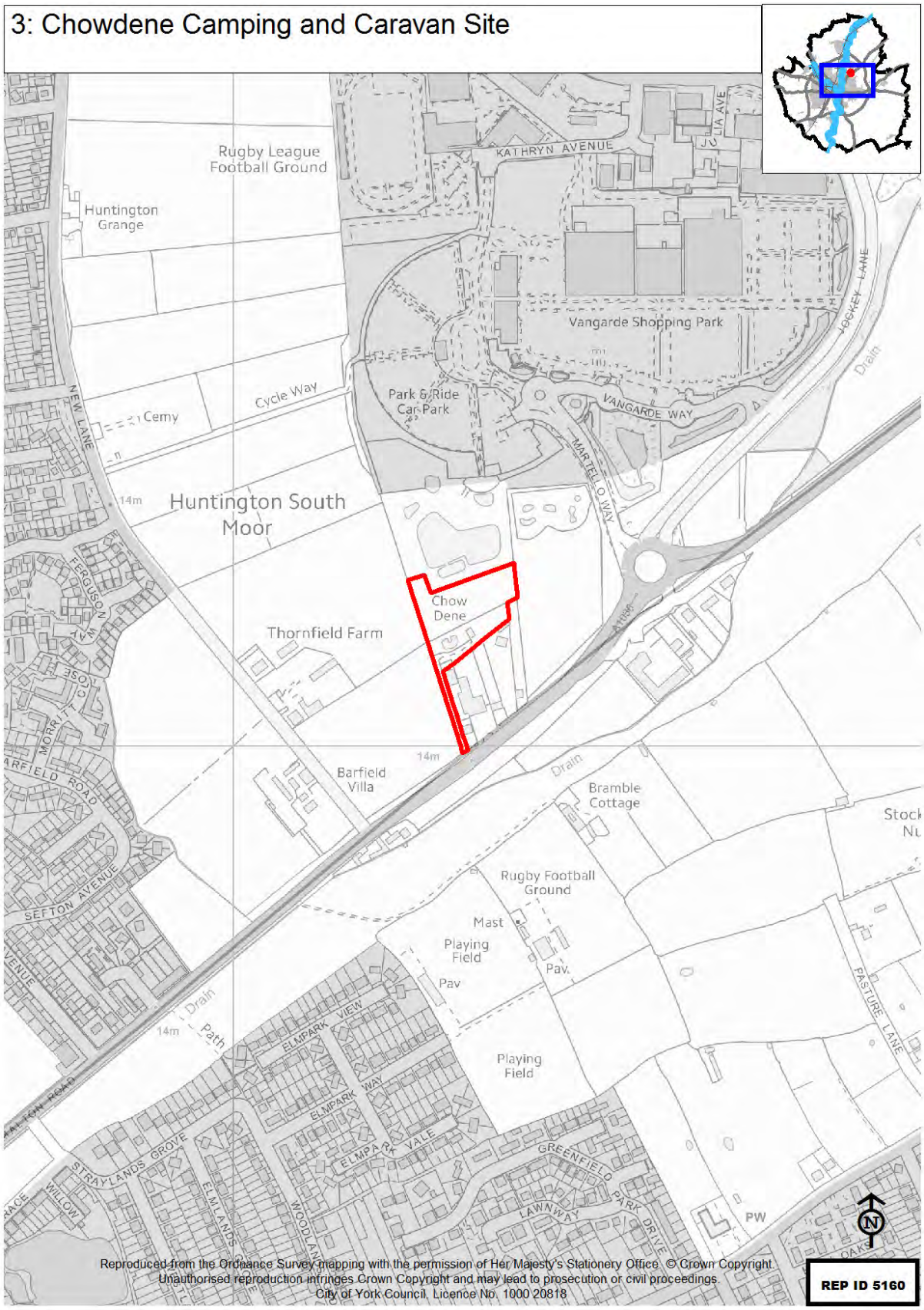
3: Chowdene Camping and Caravan Site
Rugby League Football Ground
Huntington Grange
KATHRYN AVENUE
JULIA AVE
JOCKEY LANE
Vangarde Shopping Park
Drain
Park & Ride Car Park
VANGARDE WAY
MARTELLO WAY
Cycle Way
Cemy
NEW LANE
14m
Huntington South Moor
Chow Dene
Thornfield Farm
A1036
FERGUSON WAY
CLOSE
MORRIT
ARFIELD ROAD
Barfield Villa
14m
Drain
Bramble Cottage
Stock Nu
SEFTON AVENUE
Rugby Football Ground
Mast
Playing Field
Pav.
Pav
Drain
14m
Path
ELMPARK VIEW
ELMPARK WAY
ELMPARK VALE
Playing Field
PASTURE LANE
STRAYLANDS GROVE
ELMLANDS
WOODLAND
GREENFIELD PARK DRIVE
LAWNWAY
PW
OAK
N
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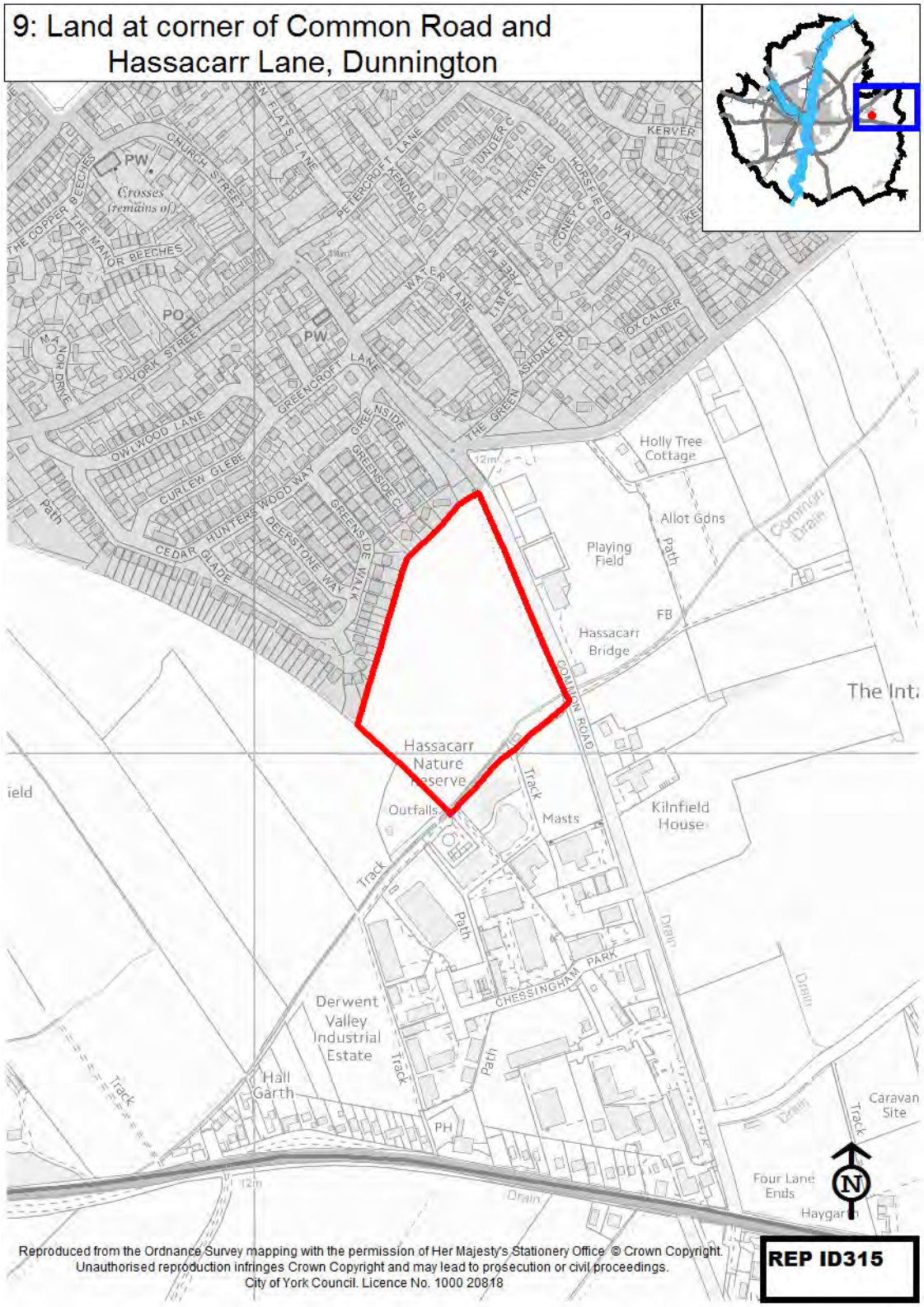
9: Land at corner of Common Road and Hassacarr Lane, Dunnington
Holly Tree Cottage
Allot Gdns
Playing Field
Common Drain
Path
FB
Hassacarr Bridge
COMMON ROAD
The Int
Hassacarr Nature Reserve
Outfalls
Track
Masts
Kilnfield House
Path
Drain
CHESSINGHAM PARK
Derwent Valley Industrial Estate
Track
Path
Hall Garth
PH
Caravan Site
Four Lane Ends
Haygarth
N
Crosses (remains of)
PW
PO
CHURCH STREET
THE COPPER BEECHES
THE MANOR BEECHES
YORK STREET
MANOR DRIVE
OWLWOOD LANE
CURLEW GLEBE
CEDAR GLADE
HUNTERS WOOD WAY
DEERSTONE WAY
GREENSIDE WALK
GREENSIDE CL
GREENCROFT LANE
THE GREEN
WATER LANE
ASHDALE RI
FOX CALDER
HORSEFIELD WAY
KERVER
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23: The Paddock Acomb Grange
CHAPEL FIELDS ROAD
BRAMHAM GROVE
BRAMHAM AVENUE
BARKSTON ROAD
BARKSTON AVENUE
BARKSTON GROVE
BRAMHAM ROAD
WALTON PL
PARKER AVE
GRANGE LANE
Drain
THE BARN
Grange
Grange Cottage
Allot Gdns
School
Acomb Grange
Mast
Broad Lane
ASKHAM LANE
WESTFIELD PLACE
Acomb Moor
N
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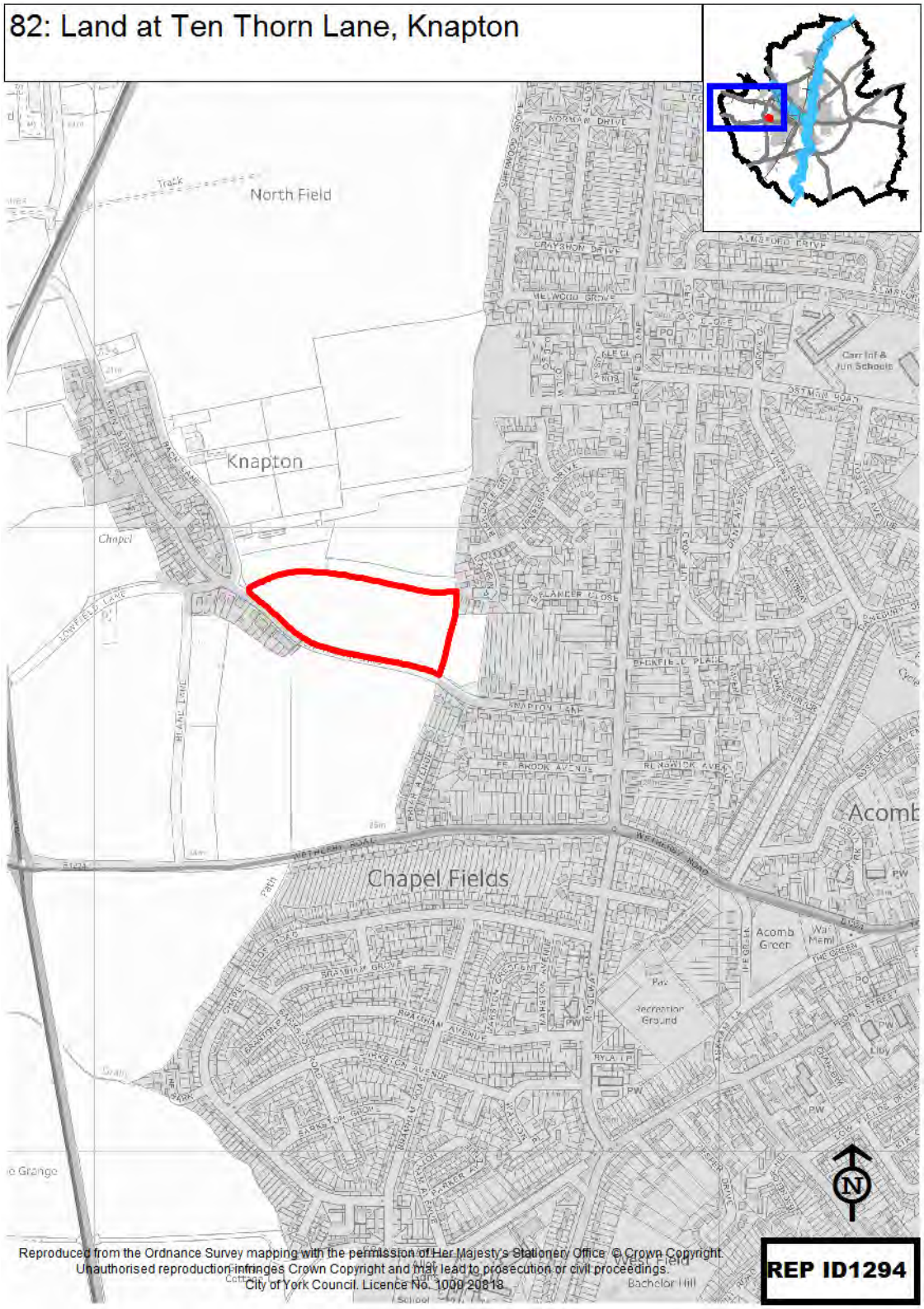
82: Land at Ten Thorn Lane, Knapton
North Field
Knapton
Chapel Fields
Acomb
Acomb Green
Recreation Ground
Carr Inf & Jun Schools
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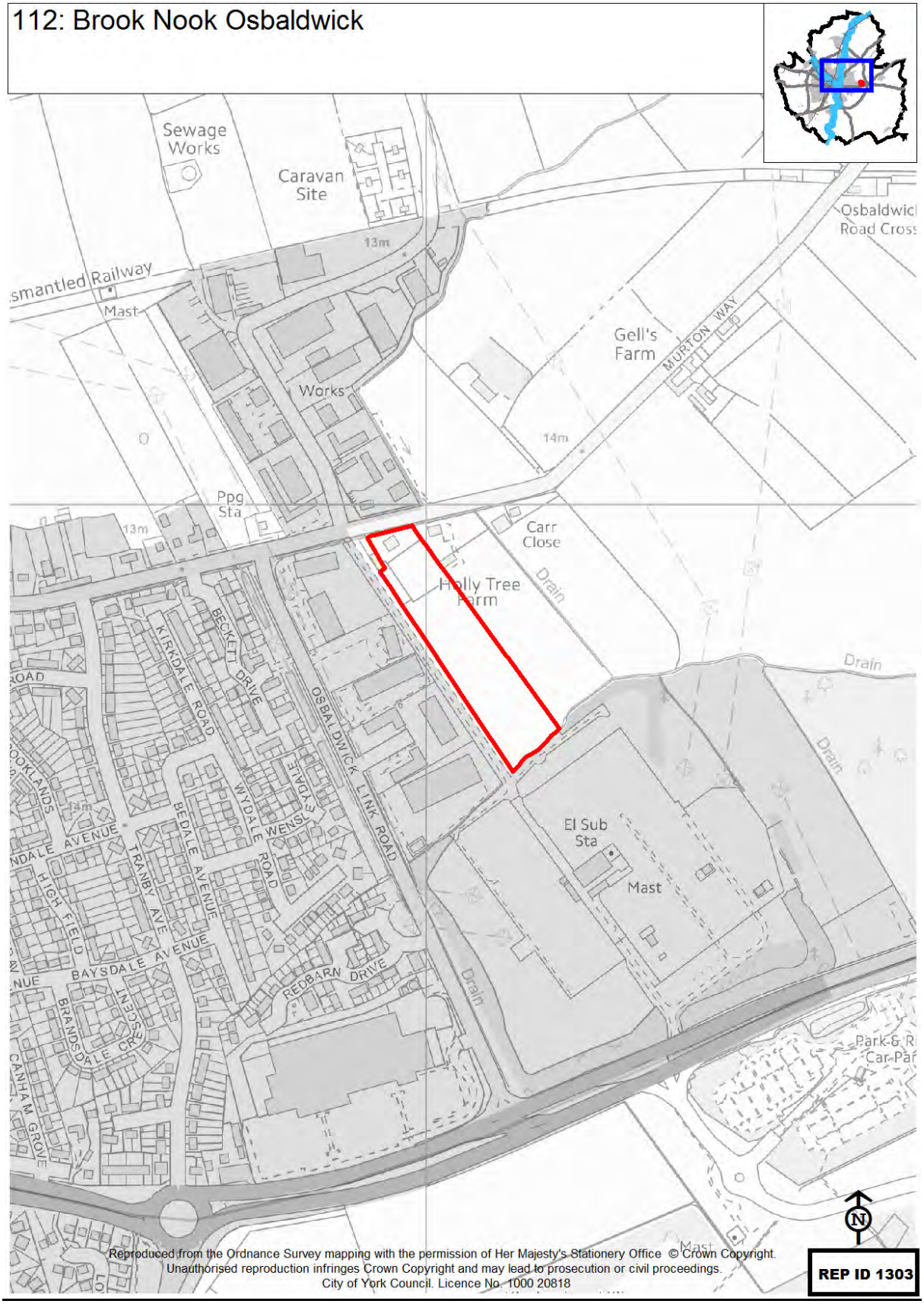
112: Brook Nook Osbaldwick
Sewage Works
Caravan Site
13m
smantled Railway
Mast
Works
Gell's Farm
MURTON WAY
14m
Ppg Sta
13m
Carr Close
Holly Tree Farm
Drain
Drain
Drain
Drain
KIRKDALE ROAD
BECKETT DRIVE
OSBALDWICK LINK ROAD
WYDALE ROAD
BEDALE AVENUE
TRANBY AVENUE
BAYSDALE AVENUE
REDBARN DRIVE
BRANDSDALE CRESCENT
CANHAM GROVE
HIGH FIELD
El Sub Sta
Mast
Mast
N
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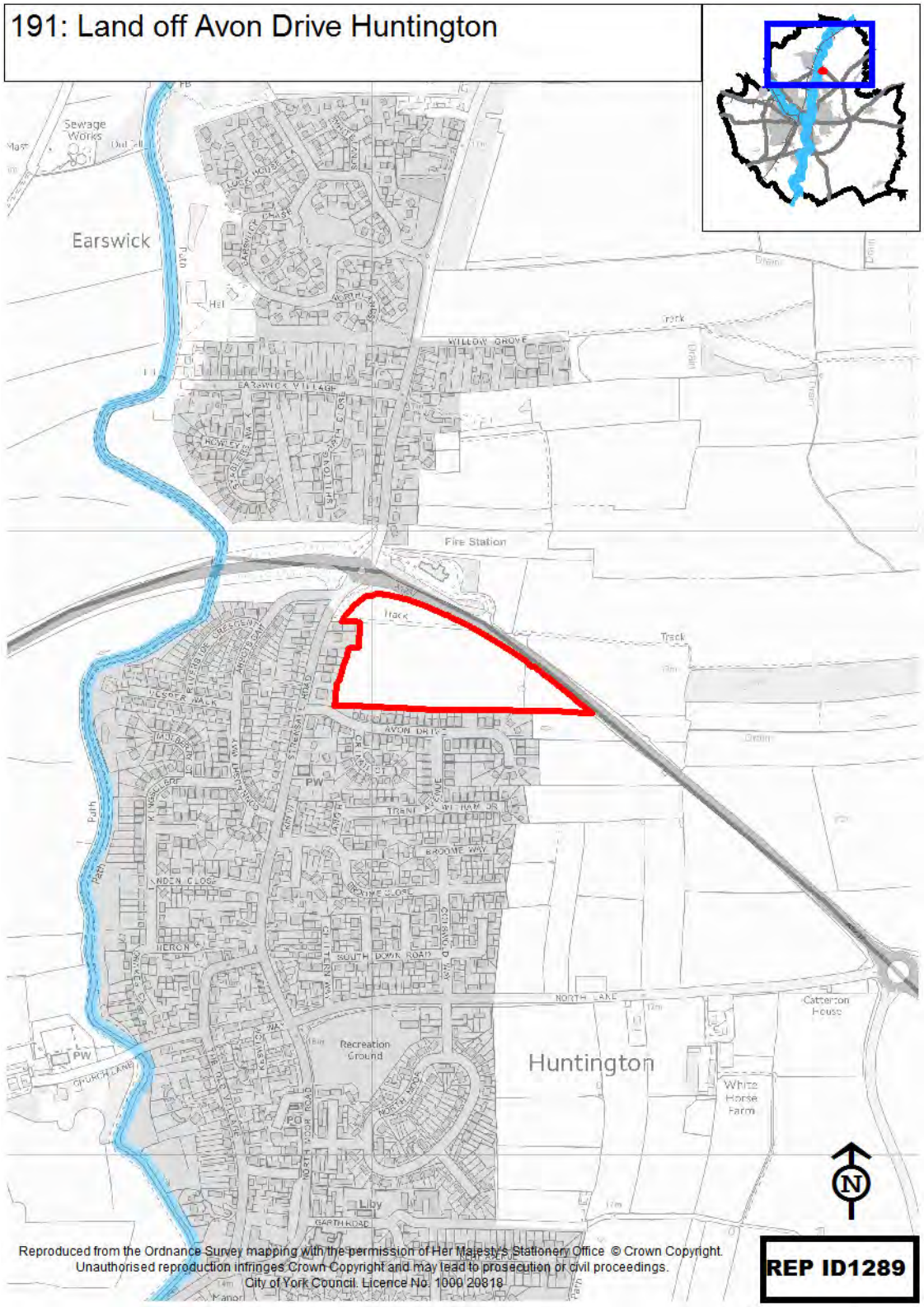
191: Land off Avon Drive Huntington
Earswick
Sewage Works
Fire Station
Track
Huntington
Recreation Ground
White Horse Farm
Catterton House
NORTH LANE
AVON DRIVE
BROOME WAY
SOUTH DOWN ROAD
CHURCH LANE
GARTH ROAD
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215: Black Dyke Farm, Upper Poppleton
LIMEGARTH
APPLE GARTH
CHANTRY GAP
CHANTRY GROVE
ORCHARD ROAD
BRACKENHILLS
SYCAMORE V
FAIRWAY DRIVE
LONG RIDGE DR
LONG RIDGE LANE
DIKELANDS CL
Upper Poppleton
PW
War Meml
The Green
PO
BEECH GROVE
WEST FIELD
LOW CROFT
HODGSON LANE
BLACK DIKE LANE
MANOR CL
STATION ROAD
Drain
Station
LC
Red Lion Bridge
Nursery
Burlands Bungalow
BURLANDS LANE
Bur Field
18m
N
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REP ID 1718

291: Land West of Bishopthorpe
Track
Drain
Drain
11m
Drain
Middl
I
Crematorium
Path
Sluice
Wall Ridge Reach
Palace Gardens
Warren Pond
Issues
Ppg Sta
TK
Palace Gardens Cottage
Garth Cottage
Bishopthorpe Garth
Drain
Bishopthorpe
Bishop Thorpe Reach
River Ouse
Fulford I
The Palace
PW
Hall
War Meml
CHURCH LANE
St Andrew's Church (remains of)
9m
CHANTRY LANE
Path
The Chantry
NEW LA
KIRKWELL
School
PO
PW
9m
MAIN STREET
FERRY LANE
Pav
Playing Field
School
SCHOOL LANE
Liby
CROFT COURT
MONTAGUE ROAD
DE GREY PL
DRUMMOND AVENUE
MYRTLE AVENUE
CODA AVENUE
THE COPPICE
APPLETON ROAD
Allot Gdns
MAPLE AV
N
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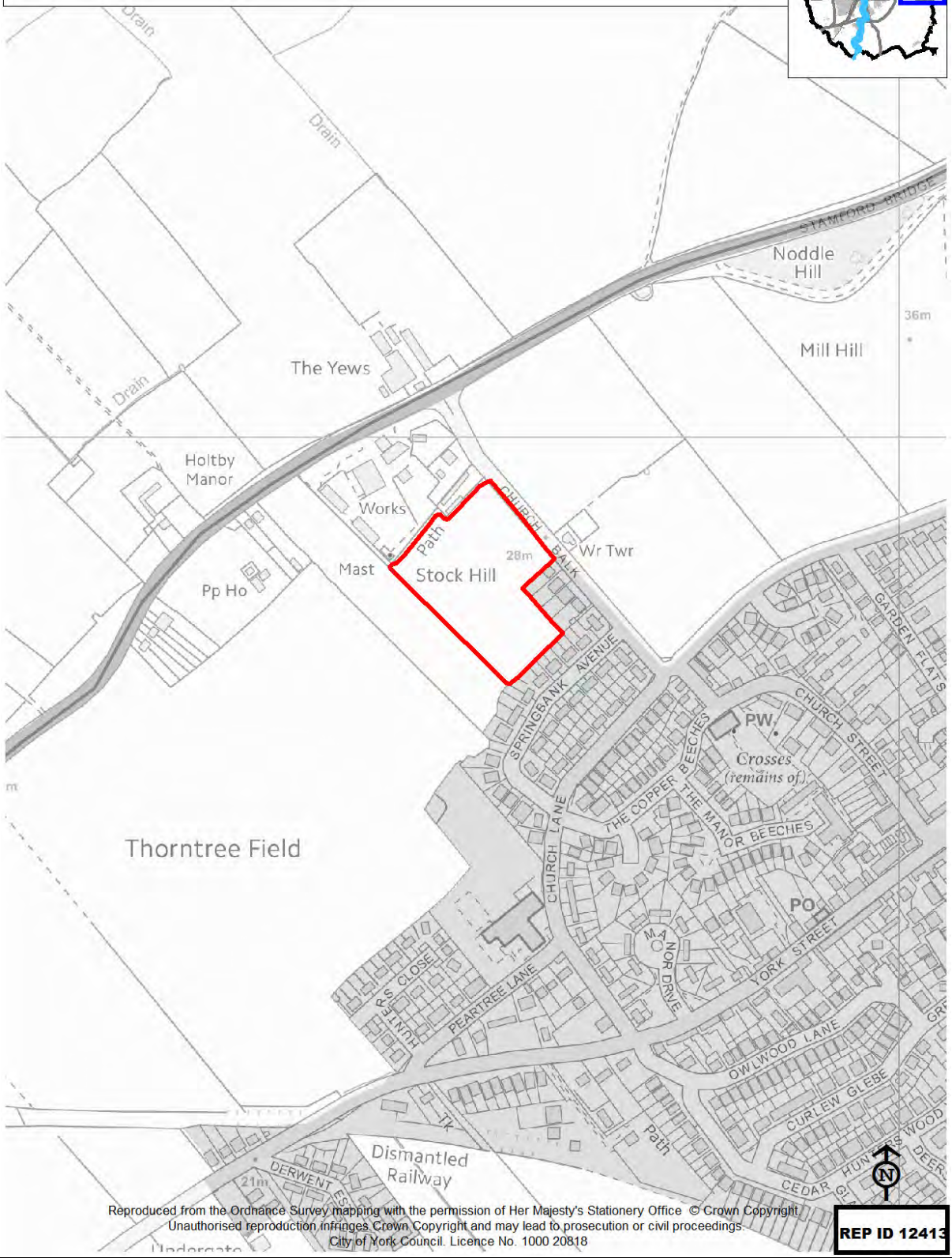
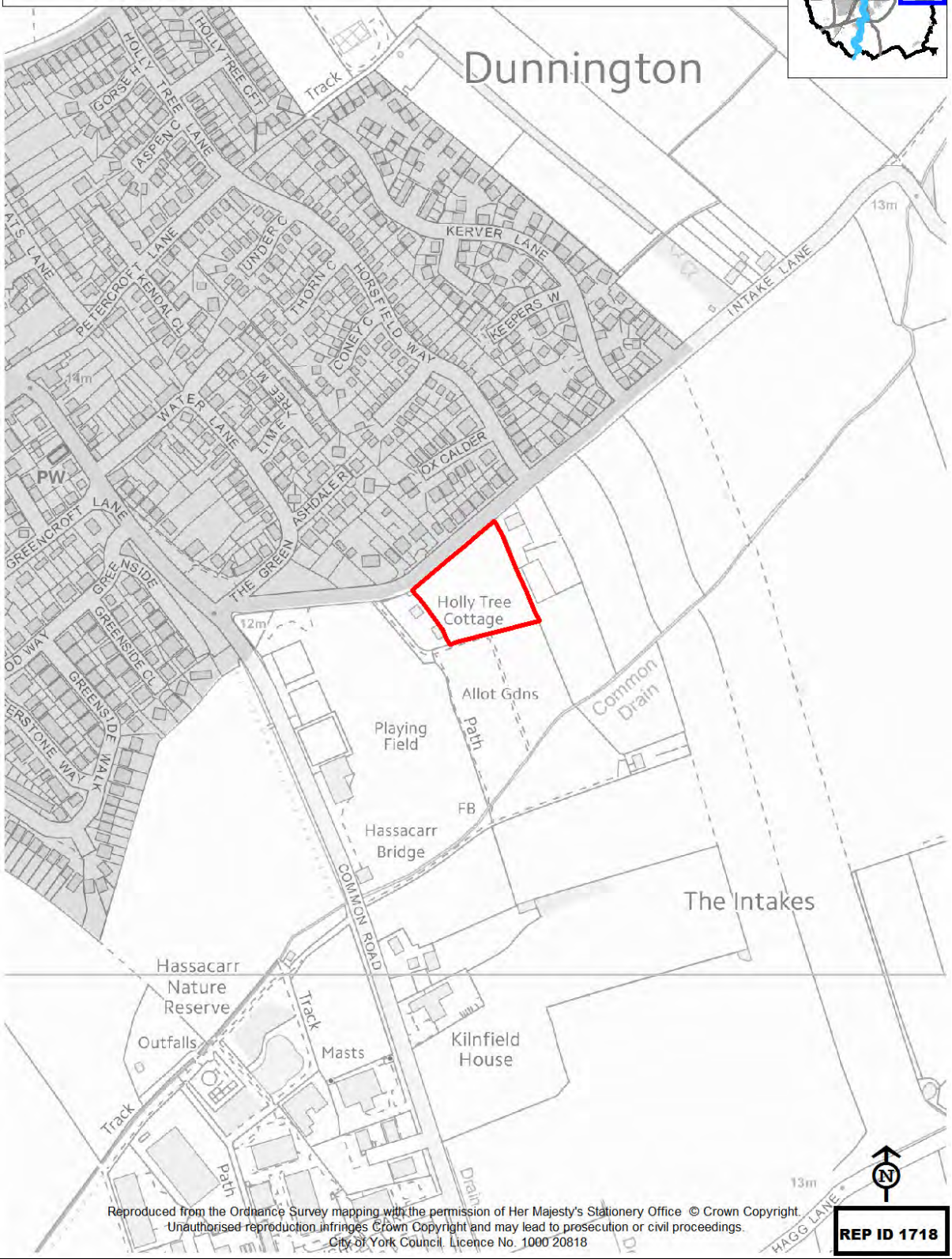
REP ID 432

737: Stock Hill Field, Church Balk, Dunnington



738: Land to the south side of Intake Lane
Dunnington



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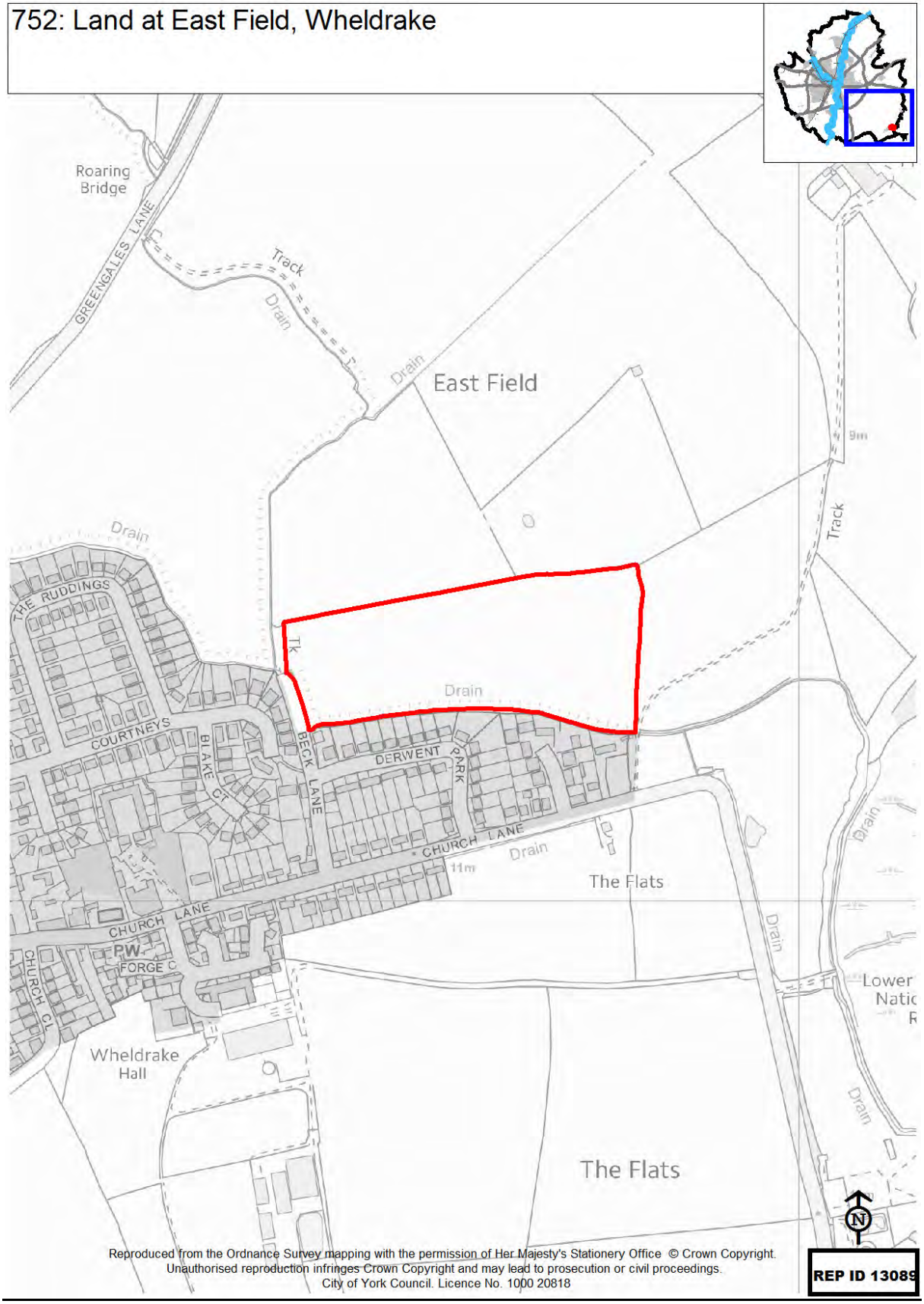
752: Land at East Field, Wheldrake
Roaring Bridge
GREENGALES LANE
Track
Drain
East Field
Drain
Drain
Track
THE RUDDINGS
COURTNEYS
BLAKE CT
BECK LANE
DERWENT PARK
Tk
Drain
CHURCH LANE
11m
Drain
The Flats
CHURCH LANE
PW
FORGE C
CHURCH CT
Wheldrake Hall
Drain
Drain
Lower Natic
The Flats
N
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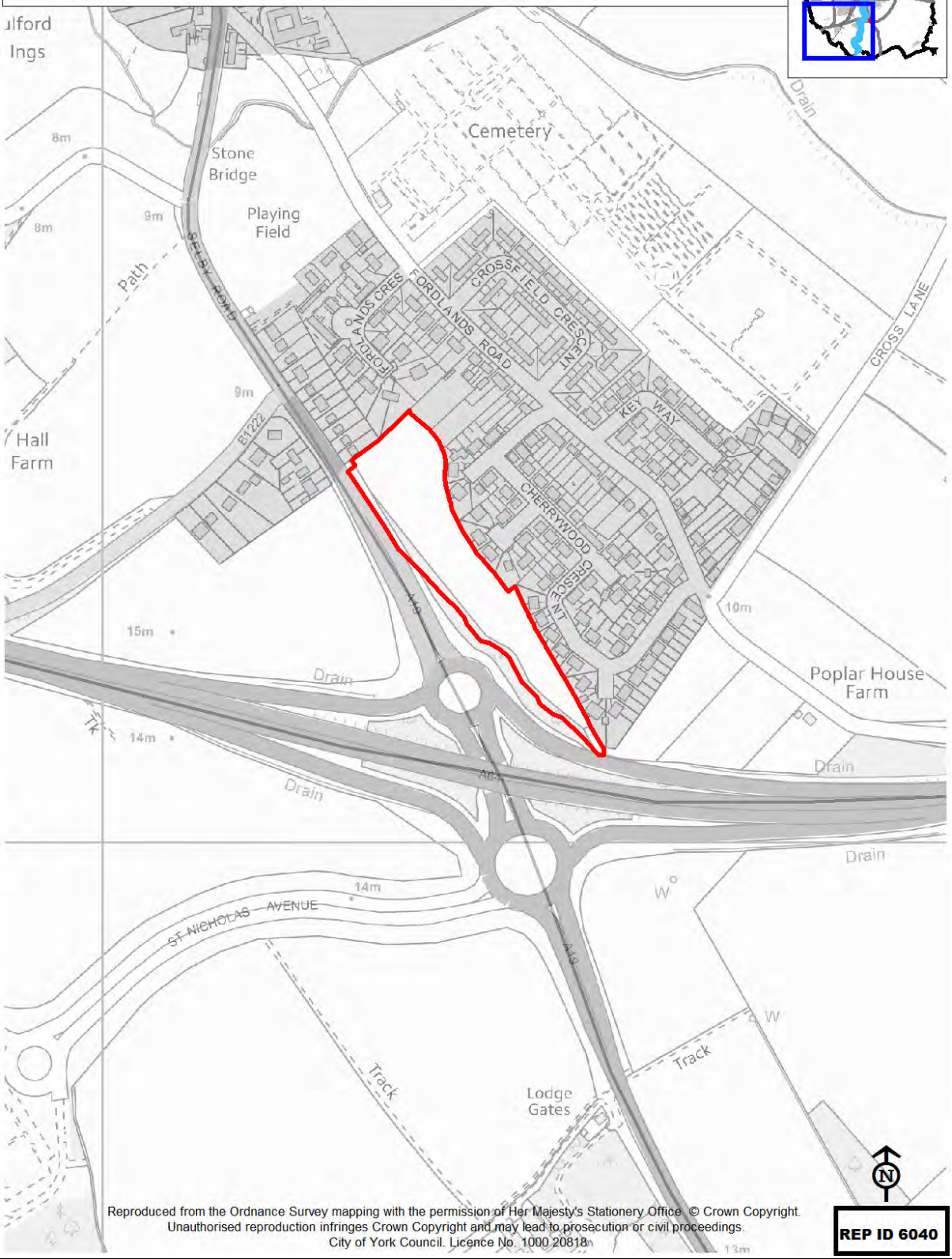
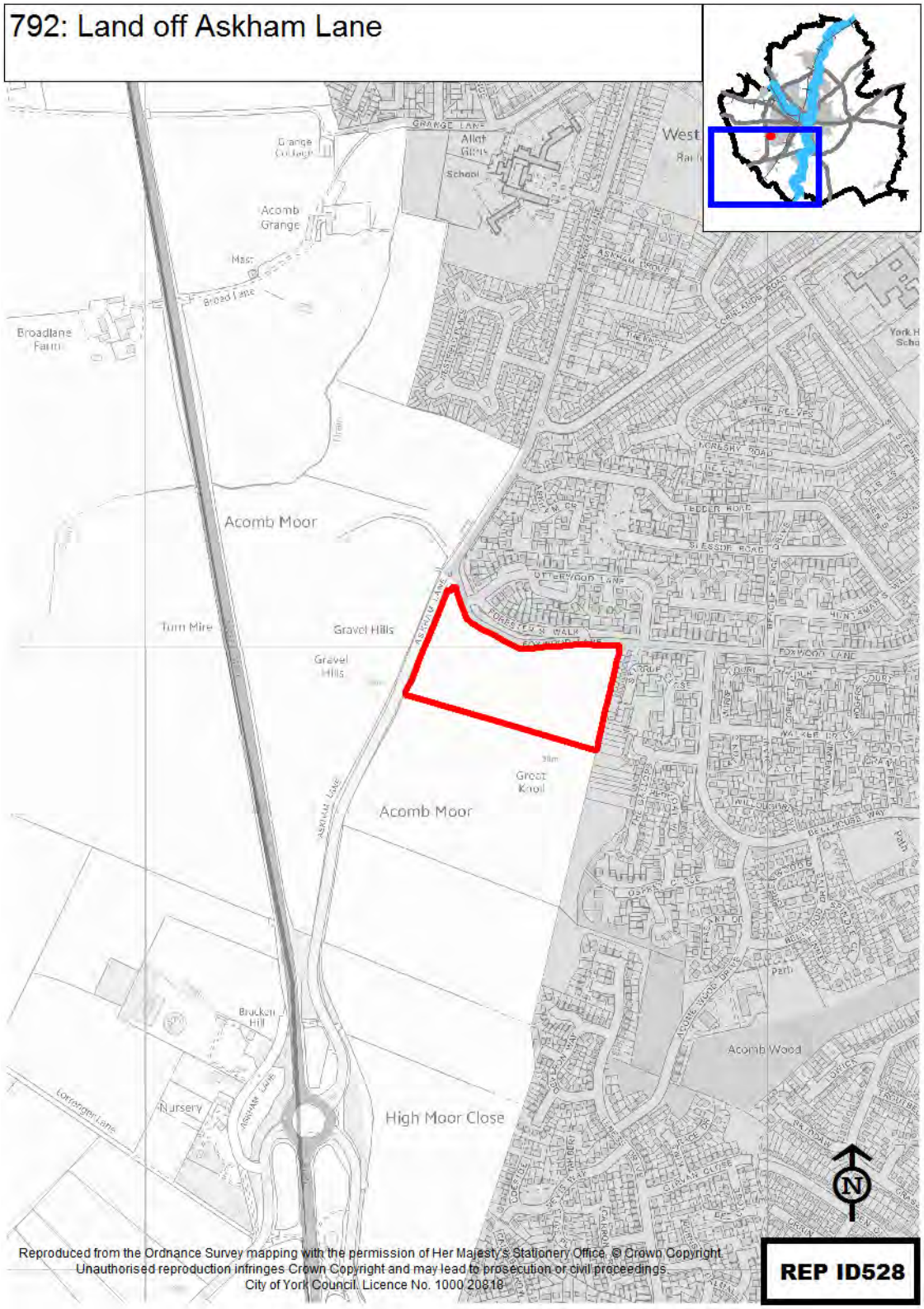
767: Land East of Selby Road




792: Land off Askham Lane
Acomb Moor
Turn Mire
Gravel Hills
Gravel Hills
Great Knoll
Acomb Moor
High Moor Close
Acomb Wood
Broadlane Farm
Acomb Grange
Broad Lane
Bracken Hill
Nursery
Lorrenger Lane
Askham Lane
Foxwood Lane
Tedder Road
Scissde Road
Thorpe Road
Grange Lane
Allot Gdns
School
West
N
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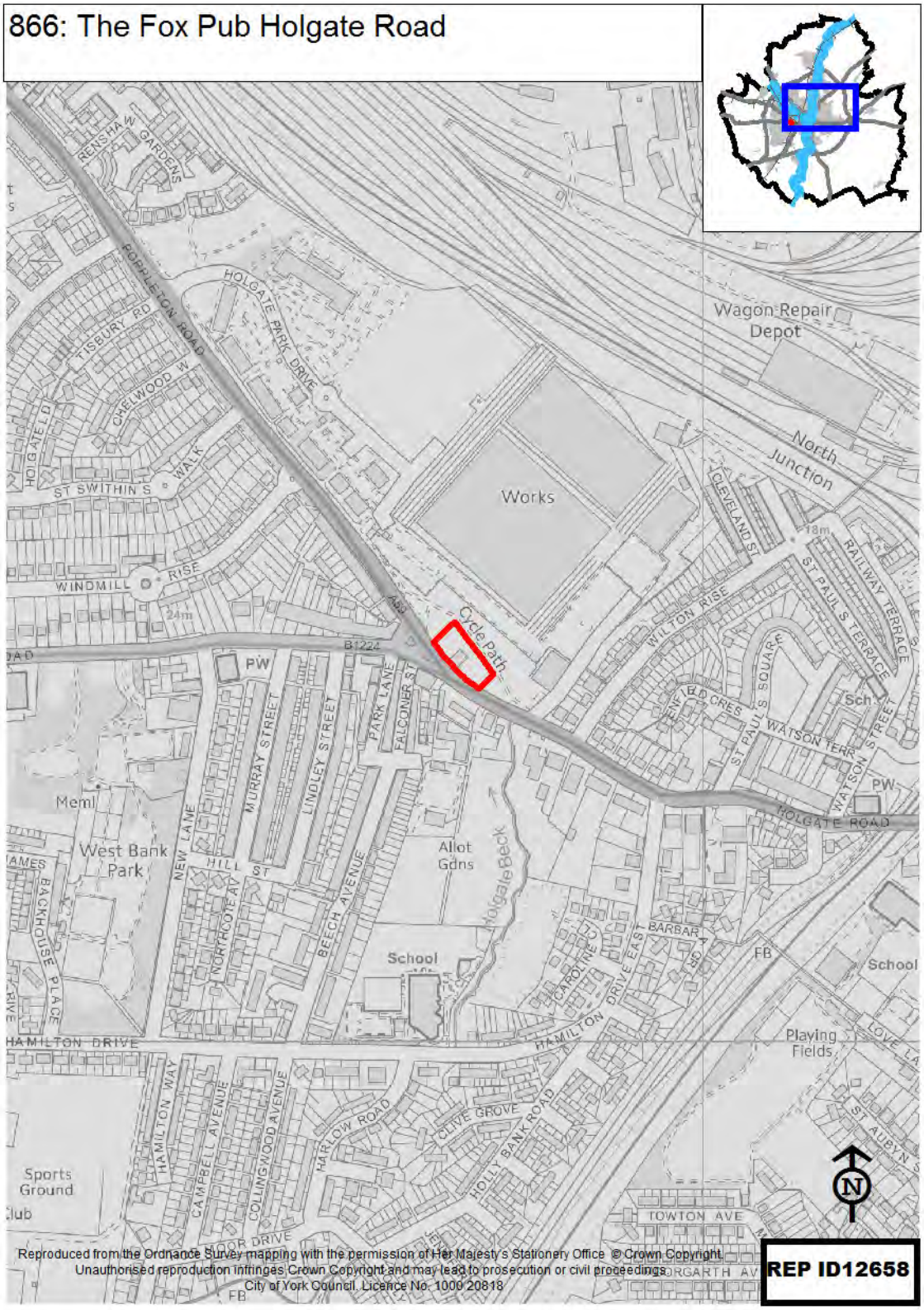
866: The Fox Pub Holgate Road
Wagon Repair Depot
North Junction
Works
Cycle Path
B1224
A59
Allot Gdns
West Bank Park
Meml
School
Playing Fields
Sports Ground
Holgate Beck
HOLGATE ROAD
HAMILTON DRIVE
WINDMILL RISE
ST SWITHIN'S WALK
RENSHAW GARDENS
ROPHLETON ROAD
HOLGATE PARK DRIVE
TISBURY RD
CHELWOOD W
HOLGATEFIELD
CLEVELAND ST
RAILWAY TERRACE
ST PAUL'S TERRACE
ST PAUL'S SQUARE
WILTON RISE
WATSON TERR
WATSON STREET
MURRAY STREET
LINDLEY STREET
PARK LANE
FALCONER ST
NEW LANE
HILL ST
BEECH AVENUE
NORTHCOTE AV
BLACKHOUSE PLACE
HAMILTON WAY
CAMPBELL AVENUE
COLLINGWOOD AVENUE
HARLOW ROAD
CLIVE GROVE
HOLLY BANK ROAD
CAROLINE DRIVE EAST
TOWTON AVE
ST AUBYN
LOVE LA
PW
FB
18m
24m
N
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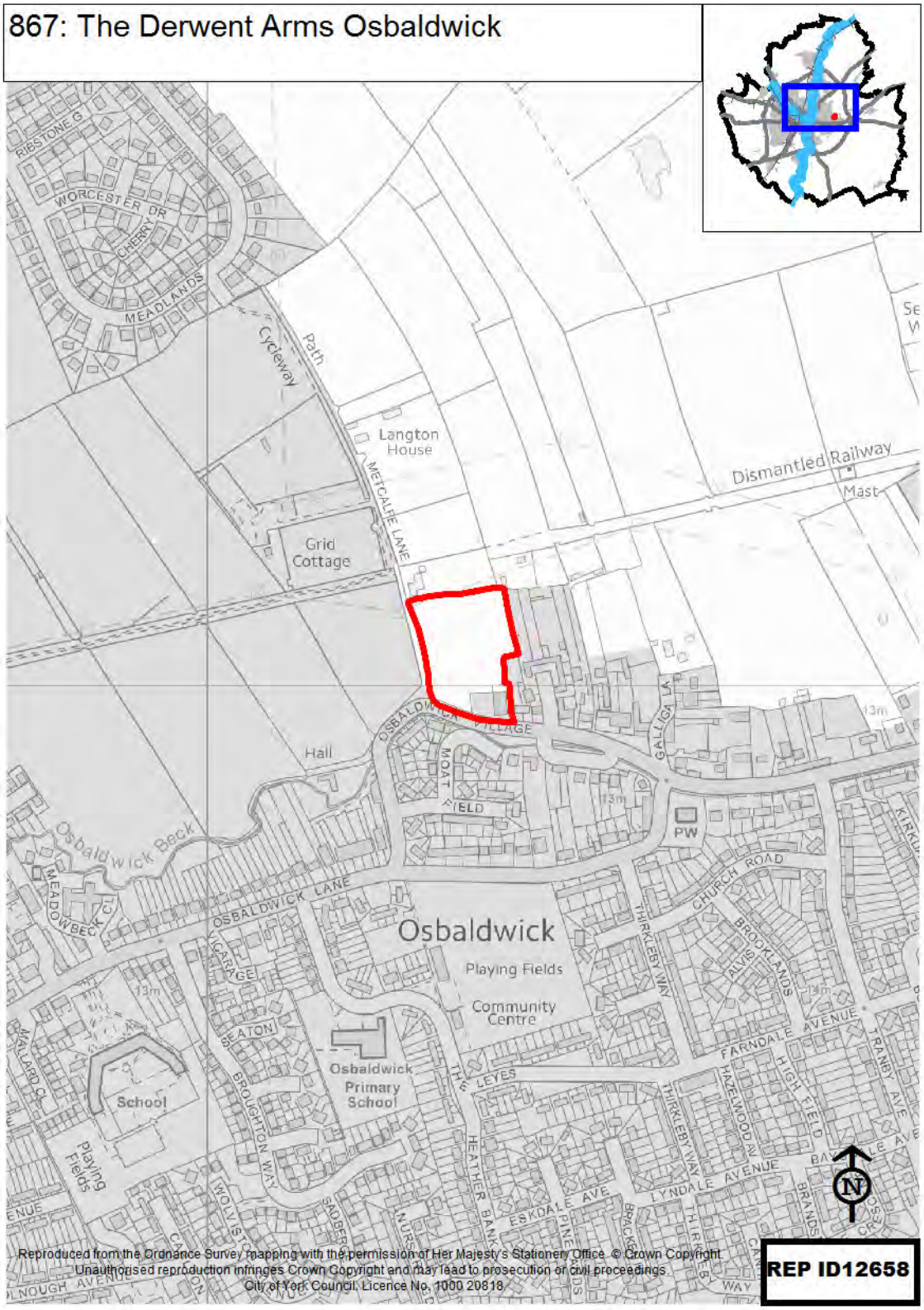
867: The Derwent Arms Osbaldwick
Langton House
Dismantled Railway
Mast
Grid Cottage
METCALFE LANE
Cycleway
Path
Hall
Osbaldwick Beck
OSBALDWICK LANE
Osbaldwick
Playing Fields
Community Centre
Osbaldwick Primary School
School
playing Fields
CHURCH ROAD
PW
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868:Land Adjacent to the Half Moon Pub Strensall
Rose Cottages
Drain
Burial Ground
Nursery
NEW LANE
Tk
Path
Tannery
Track
Weir
Strensall Bridge
Manor House
Liby
PH
THE VILLAGE
PW
SOUTHFIELDS ROAD
CHURCH LANE
Bone Dike
Drain
Allot Gdns
TERRINGTON CL
CHATSW
CHAUCER LANE
REDMAYNE
DUNCOMBE
ORMAVE
BACKLEE CL
NORTHFIELDS
NETHERWOODS
Hall
Playing Fields
Works
School
WEST END
MOORLAND CL
WILKINSON WAY
RIVERSIDEWALK
MIDDLECROFT DRIVE
WOOD CL
MIDDLECROFT GR
LOW CL
GLEBE CL
PRINCESS ROAD
ORCHARD WAY
LC
Strensall
YORK ROAD
OAKLANDS
MOOR LANE
MELGOMBE AVE
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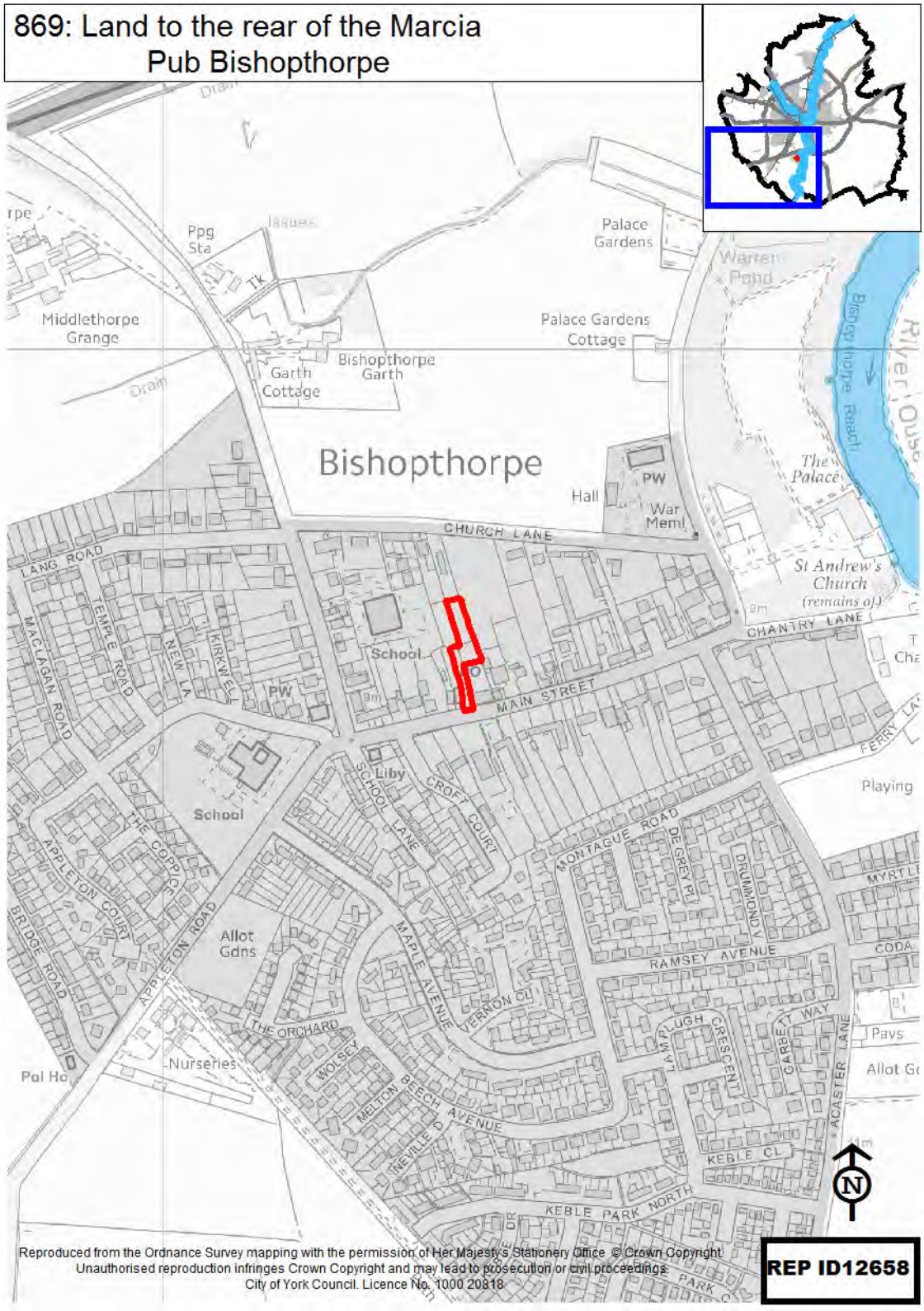

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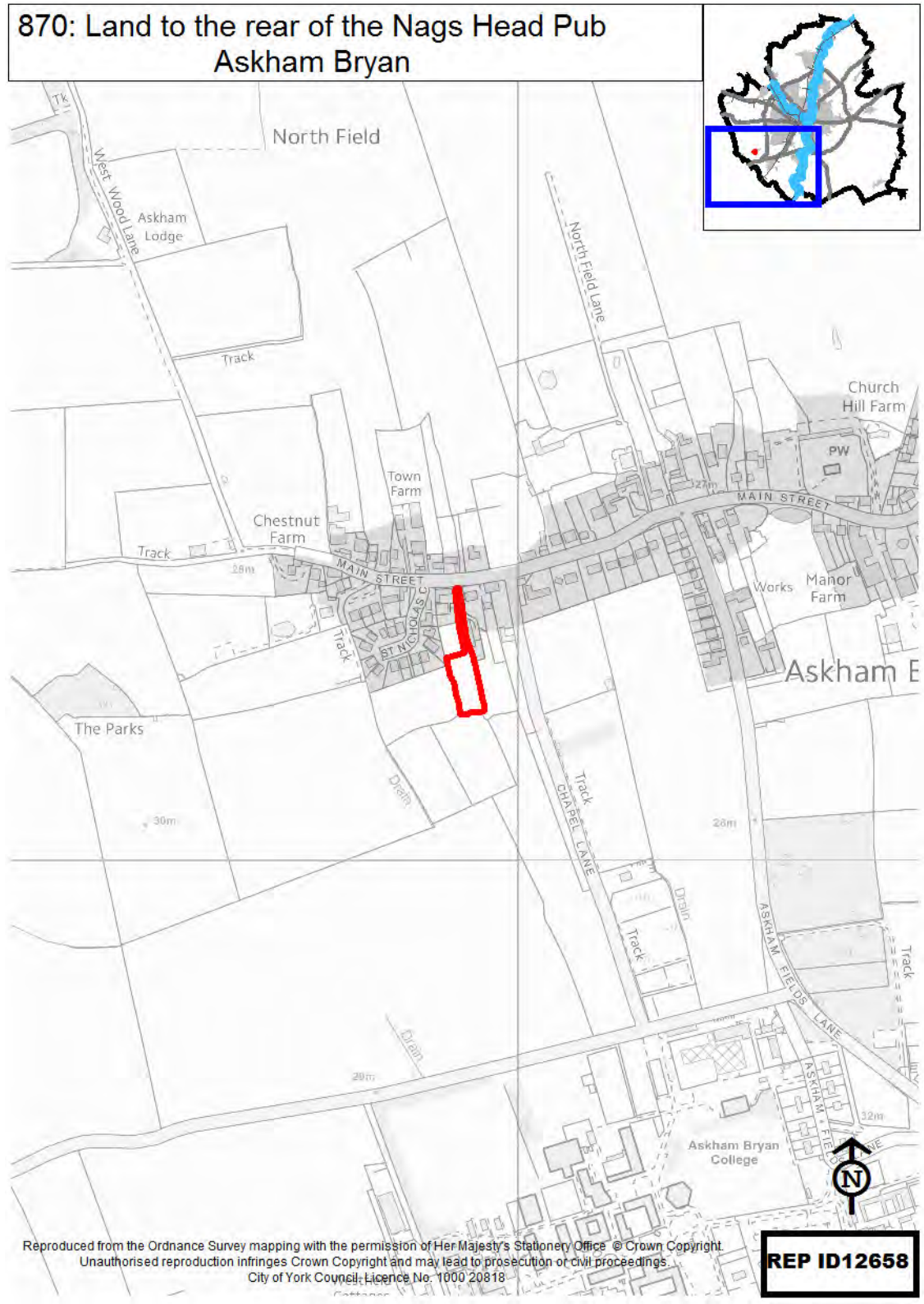
870: Land to the rear of the Nags Head Pub
Askham Bryan
North Field
West Wood Lane
Askham Lodge
Track
North Field Lane
Church Hill Farm
PW
Town Farm
MAIN STREET
Chestnut Farm
Track
28m
MAIN STREET
ST NICHOLAS CL
Works
Manor Farm
Askham E
Track
The Parks
Drain
30m
Track
CHAPEL LANE
28m
Drain
Track
ASKHAM FIELDS LANE
Track
Drain
29m
Askham Bryan College
32m
N
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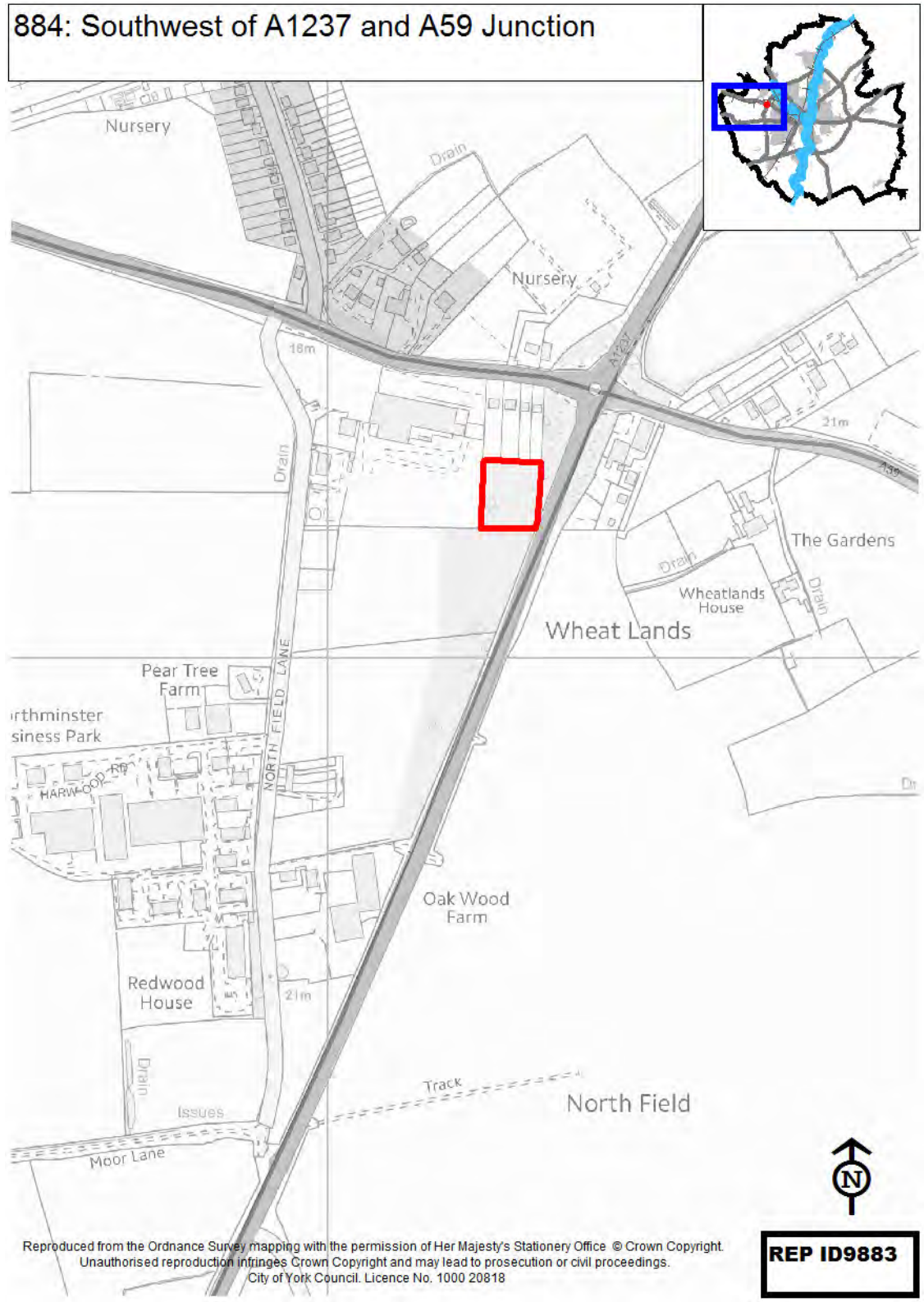
884: Southwest of A1237 and A59 Junction
Nursery
Drain
Nursery
18m
A59
21m
Drain
The Gardens
Drain
Wheatlands House
Drain
Wheat Lands
Pear Tree Farm
NORTH FIELD LANE
Oak Wood Farm
Redwood House
21m
Drain
Track
North Field
Issues
Moor Lane
N
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REP ID9883

885: Minster Equine Veterinary Clinic
Nursery
Drain
Nursery
18m
A19
21m
Drain
The Gardens
Drain
Wheatlands House
Drain
Wheat Lands
Pear Tree Farm
NORTH FIELD LANE
Oak Wood Farm
Redwood House
21m
Drain
Track
North Field
Issues
Moor Lane
N
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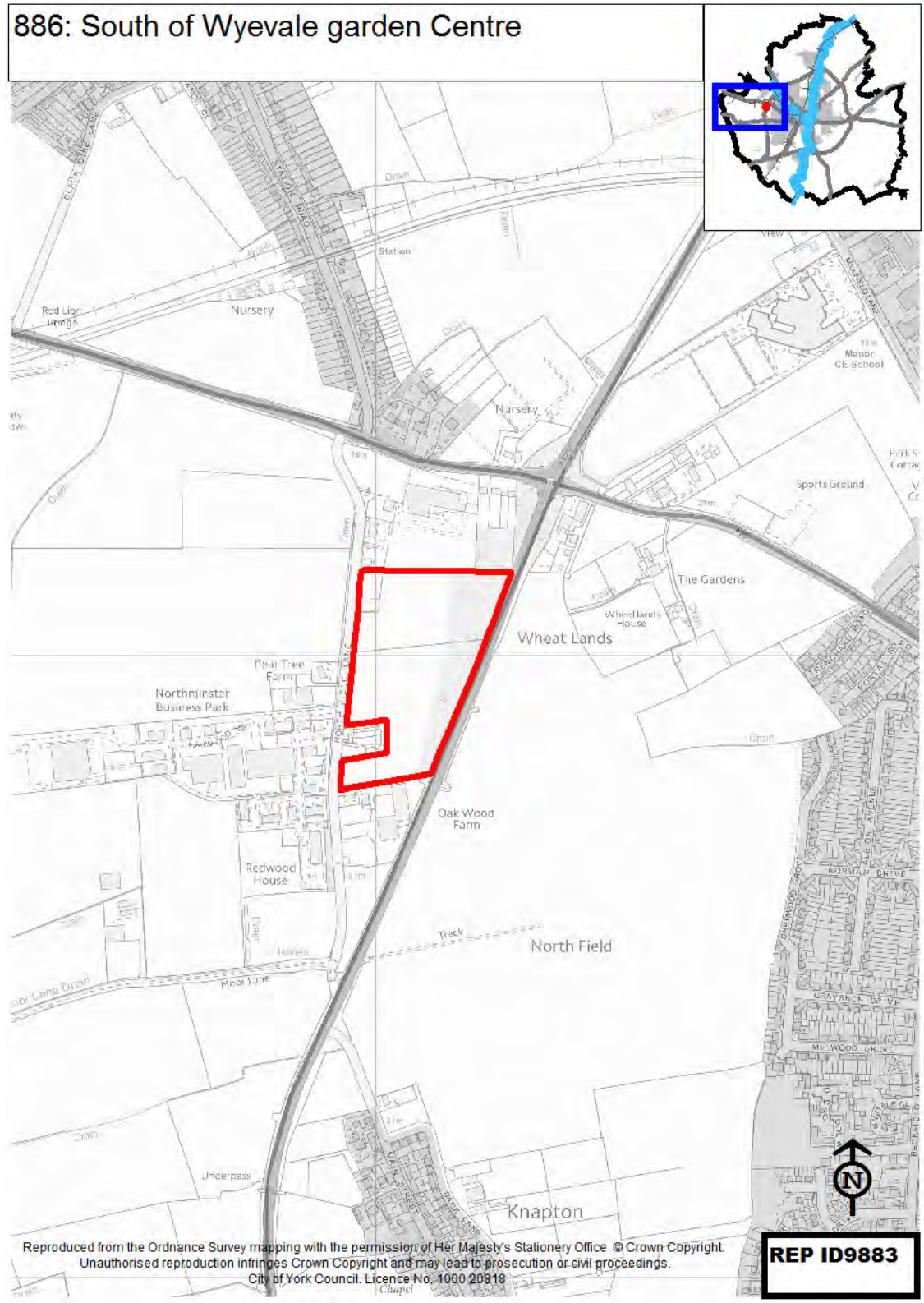
REP ID9883


886: South of Wyevale garden Centre
Nursery
Station
Red Lion Inn
Manor CE School
Sports Ground
The Gardens
Wheat Lands
Wheat Lands House
Northminster Business Park
Oak Wood Farm
Redwood House
North Field
Knapton
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REP ID9883

890: Luigis
Station
Nursery
Nursery
Drain
Drain
Drain
Drain
18m
Wheat Lands
Pear Tree Farm
Northminster Business Park
HARWOOD RD
NORTH FIELD LANE
Oak Wood Farm
Redwood House
21m
N
REP ID13092
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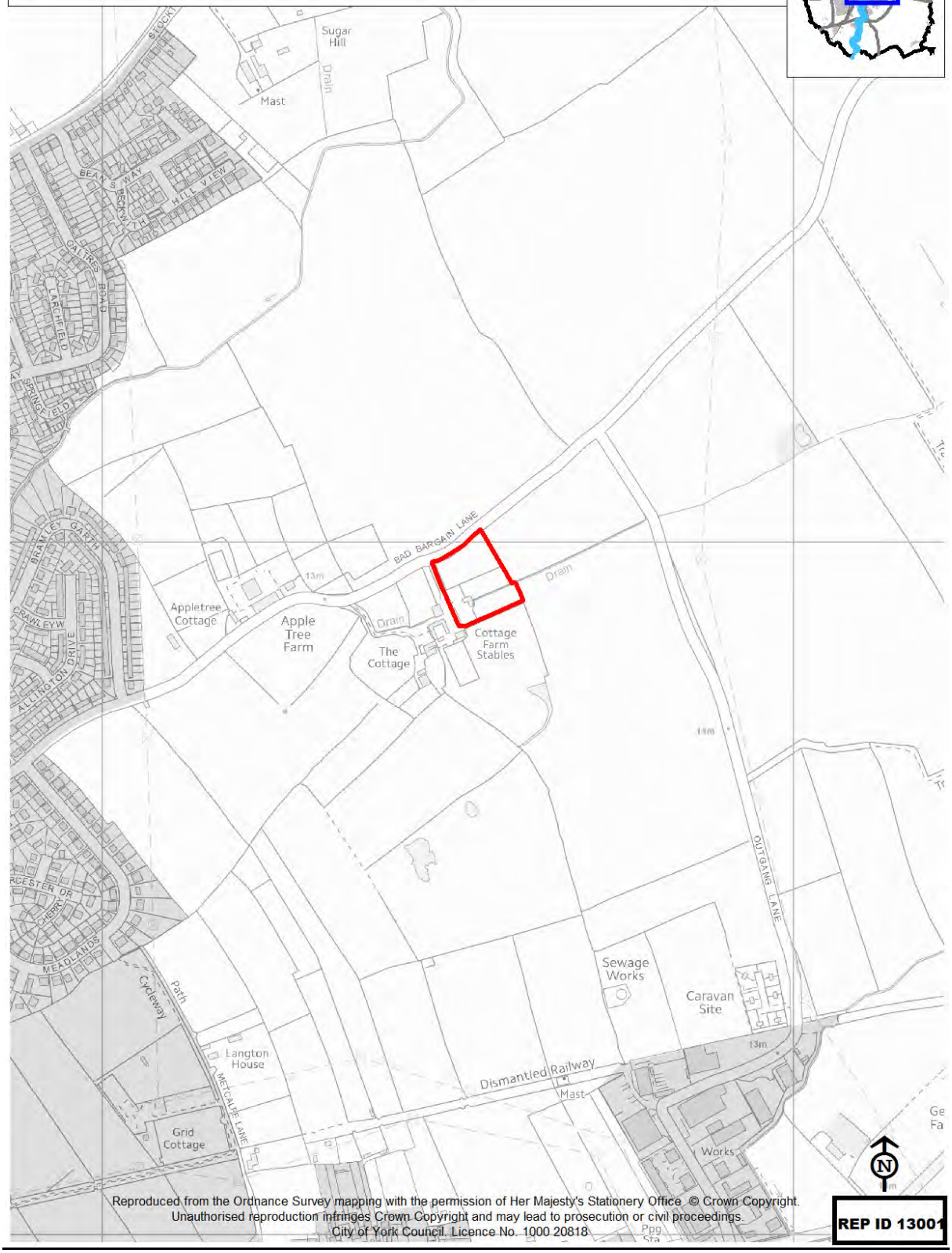
893: Sun and Moon Cottage, Bad Bargain Lane



895:Meadow Farm, Cross Moor Lane, Haxby
Haxby Lodge Farm
Golden Hill Farm
Haxby Moor
Beech House
Chaloner Pond
Meadow Farm
Pasture Farm
Jubilee Farm
Yew Tree Farm
CROSSMOOR LANE
Haxby Grange Farm
Thornville
Fir Croft Farm
Haxby Moor
Drylands Close
The Lodge
Meadow Court
Crookland Lane (Track)
USHER LANE
Cemy
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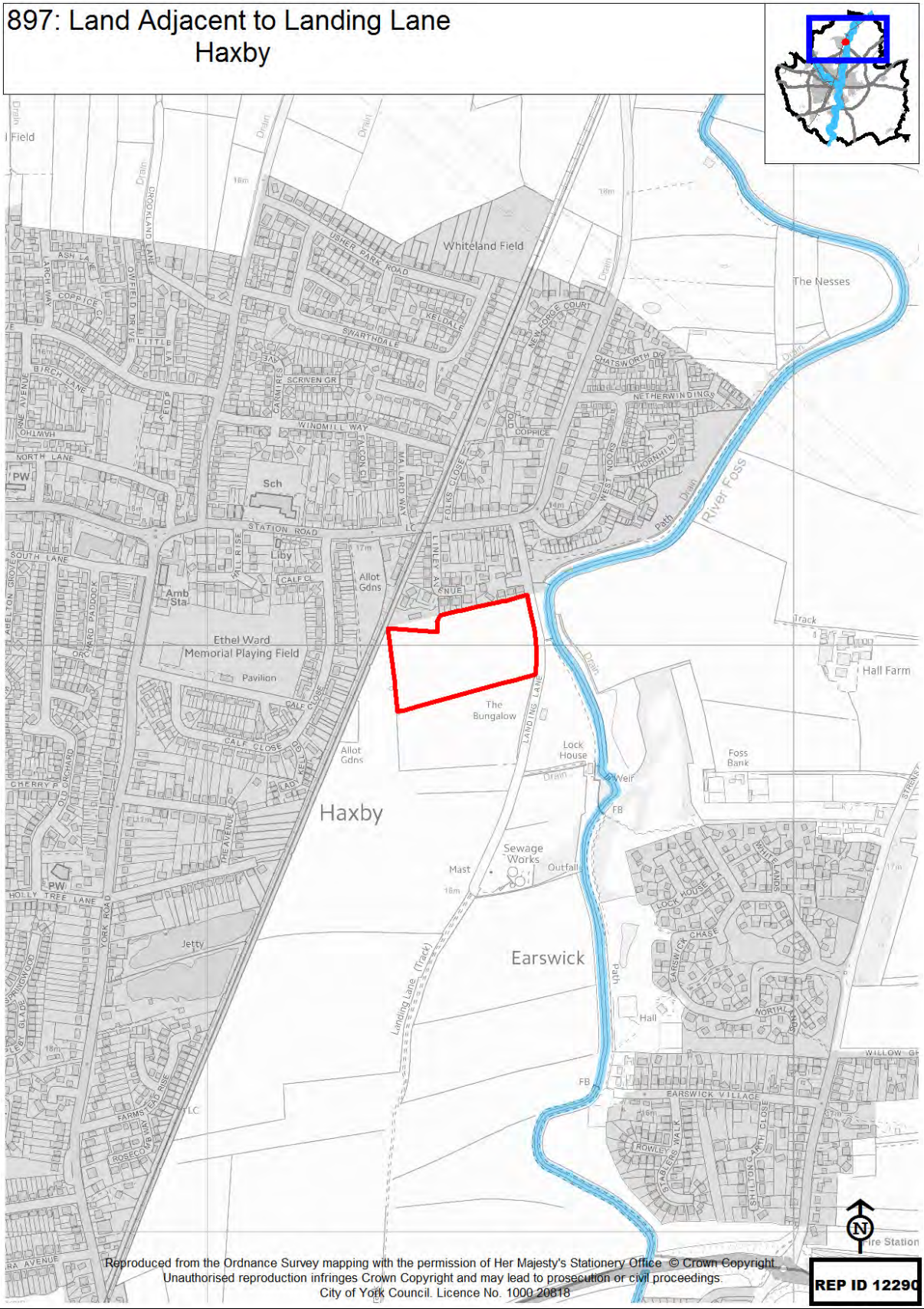
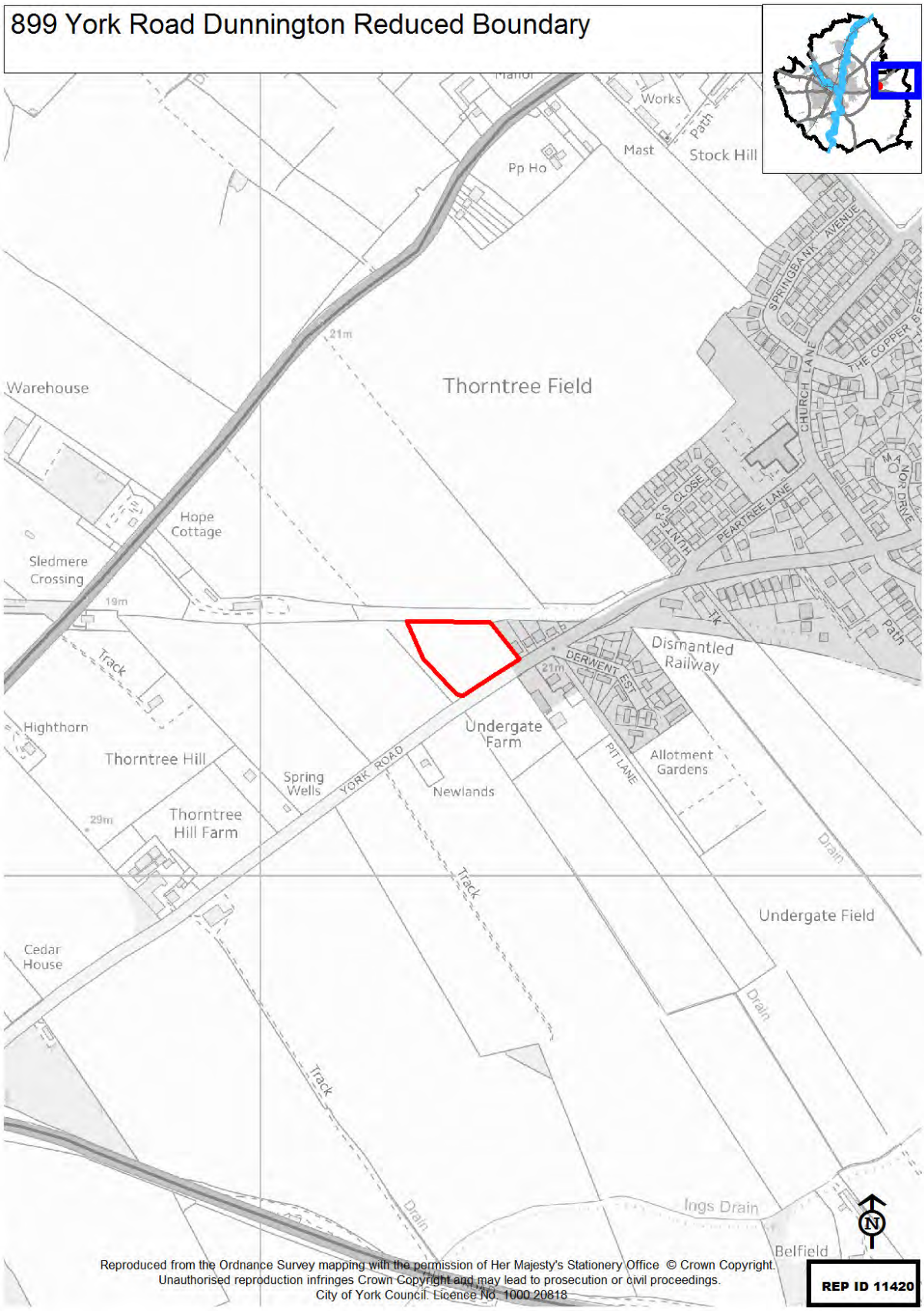
REP ID 13002

897: Land Adjacent to Landing Lane Haxby




899 York Road Dunnington Reduced Boundary
Works
Path
Mast
Stock Hill
Pp Ho
Thorntree Field
Warehouse
Hope Cottage
Sledmere Crossing
Track
Highthorn
Thorntree Hill
Thorntree Hill Farm
Spring Wells
YORK ROAD
Newlands
Undergate Farm
Dismantled Railway
DERWENT EST
PIT LANE
Allotment Gardens
Undergate Field
Drain
Cedar House
Ings Drain
Belfield
SPRINGBANK AVENUE
THE COPPER BEECHES
CHURCH LANE
MOOR DRIVE
HUNTS CLOSE
PEARTREE LANE
Path
21m
19m
29m
N
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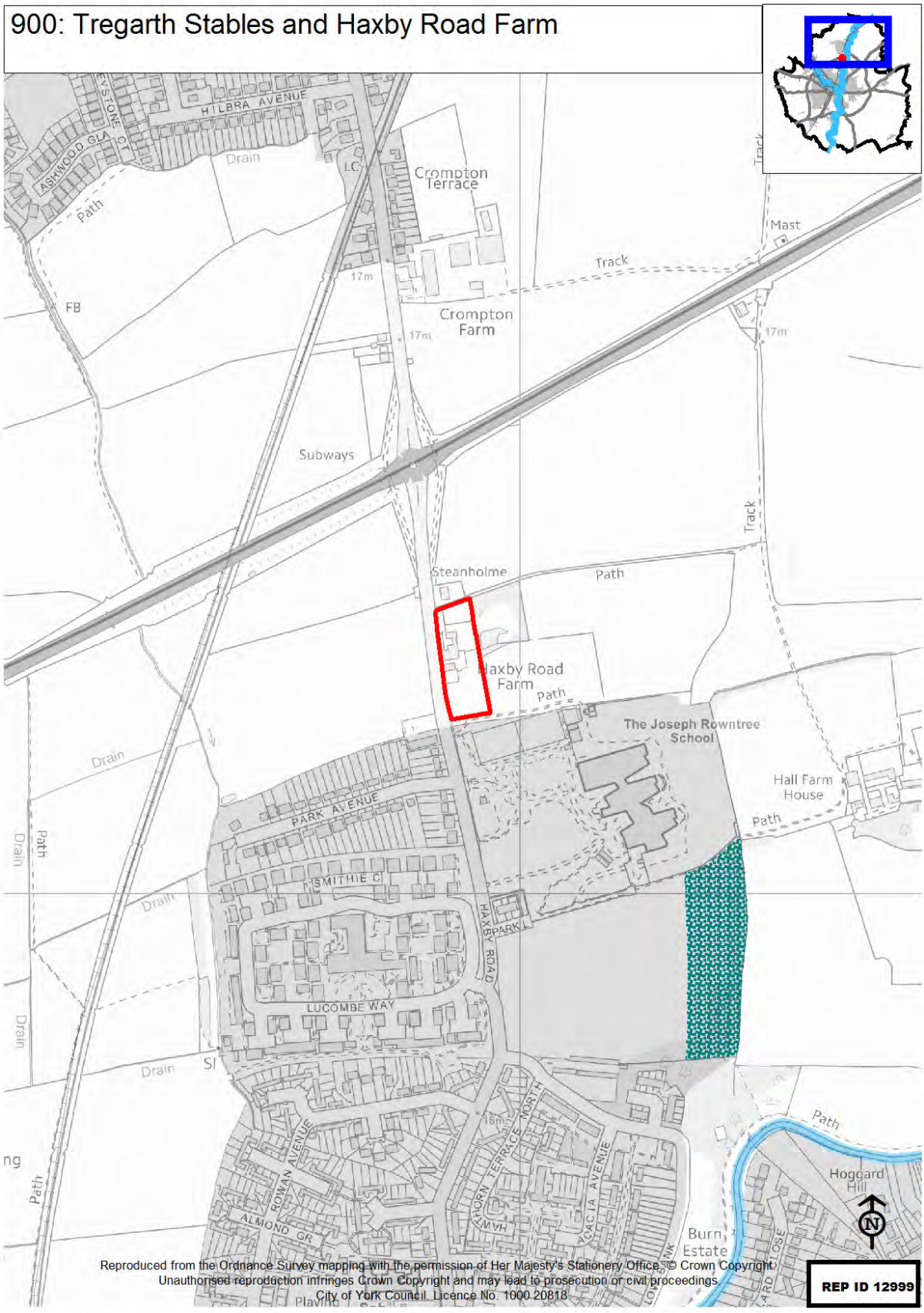
900: Tregarth Stables and Haxby Road Farm
HILBRA AVENUE
ASHWOOD GLA
EYSTONE C
Drain
LC
Crompton Terrace
Path
Track
Mast
17m
FB
Crompton Farm
Subways
Steanholme
Path
Haxby Road Farm
The Joseph Rowntree School
Hall Farm House
PARK AVENUE
SMITHIE C
HAXBY PARK
HAXBY ROAD
LUCOMBE WAY
ROWAN AVENUE
ALMOND GR
THORN TERRACE NORTH
ACACIA AVENUE
Hoggard Hill
Burn Estate
Playing
N
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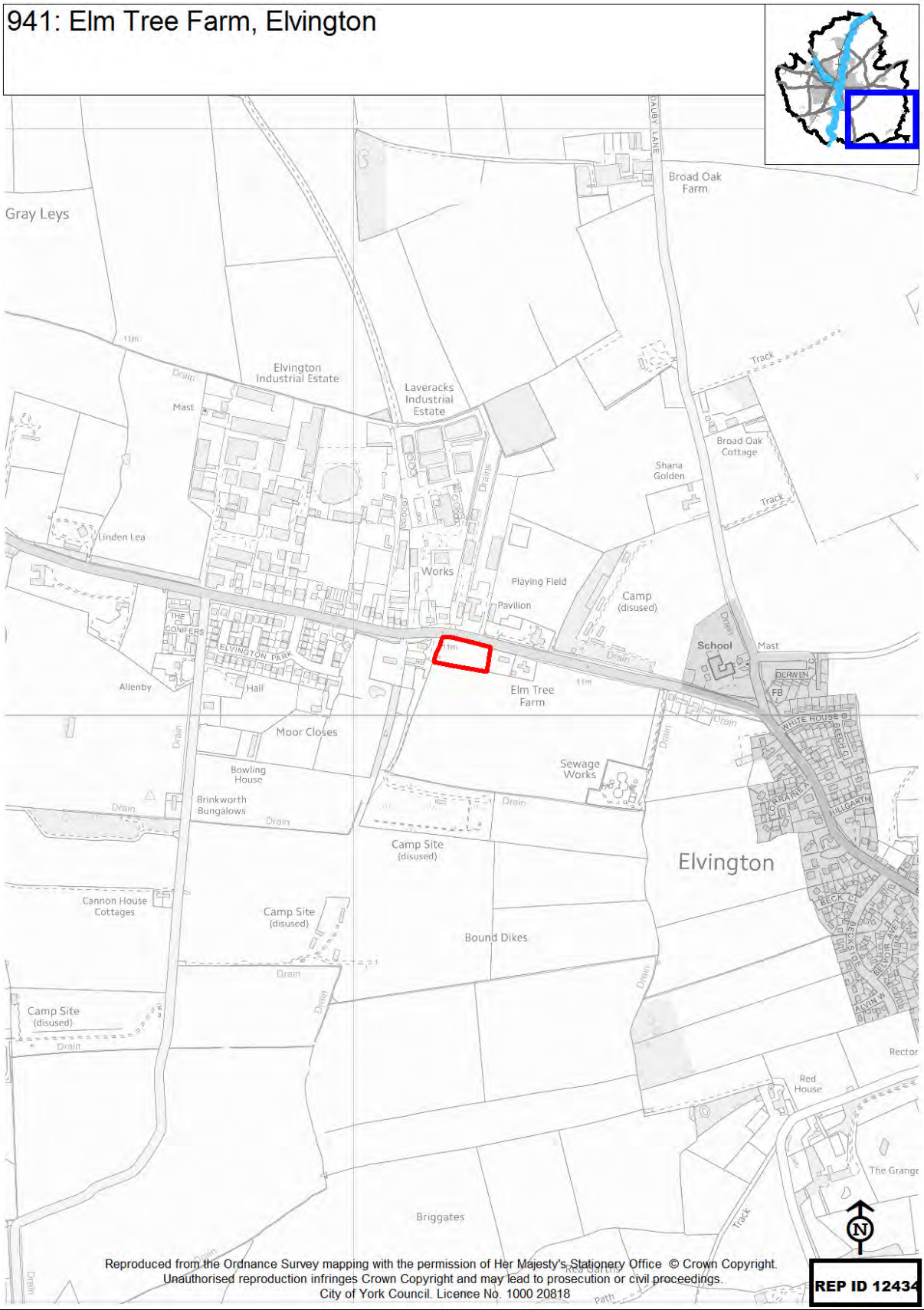
941: Elm Tree Farm, Elvington
Gray Leys
Broad Oak Farm
DAUBY LANE
Elvington Industrial Estate
Laveracks Industrial Estate
Mast
Drain
Track
Broad Oak Cottage
Shana Golden
Linden Lea
Works
Playing Field
Pavilion
Camp (disused)
THE CONIFERS
ELVINGTON PARK
Allenby
Hall
Elm Tree Farm
School
Moor Closes
Bowling House
Brinkworth Bungalows
Sewage Works
Camp Site (disused)
Elvington
Cannon House Cottages
Bound Dikes
Rectory
Red House
The Grange
Briggates
N
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942: Chaplefields PSC Submission
Chapel Fields
WETHERBY ROAD
B1224
A1237
Path
CHAPEL FIELDS ROAD
BRAMHAM GROVE
BRAMHAM AVENUE
MARSTON CRESCENT
MARSTON AVENUE
BRANTON P
BARKSTON ROAD
BARKSTON AVENUE
BARKSTON GROVE
BRAMHAM ROAD
MALTON PL
HOTHAM AVENUE
PARKER AVE
Drain
THE BARN
The Grange
GRANGE LANE
Grange Cottage
Allot Gdns
School
Acomb Grange
Mast
Broad Lane
Broadlane Farm
ASKHAM LANE
WESTFIELD PLACE
Acomb Moor
26m
24m
22m
N
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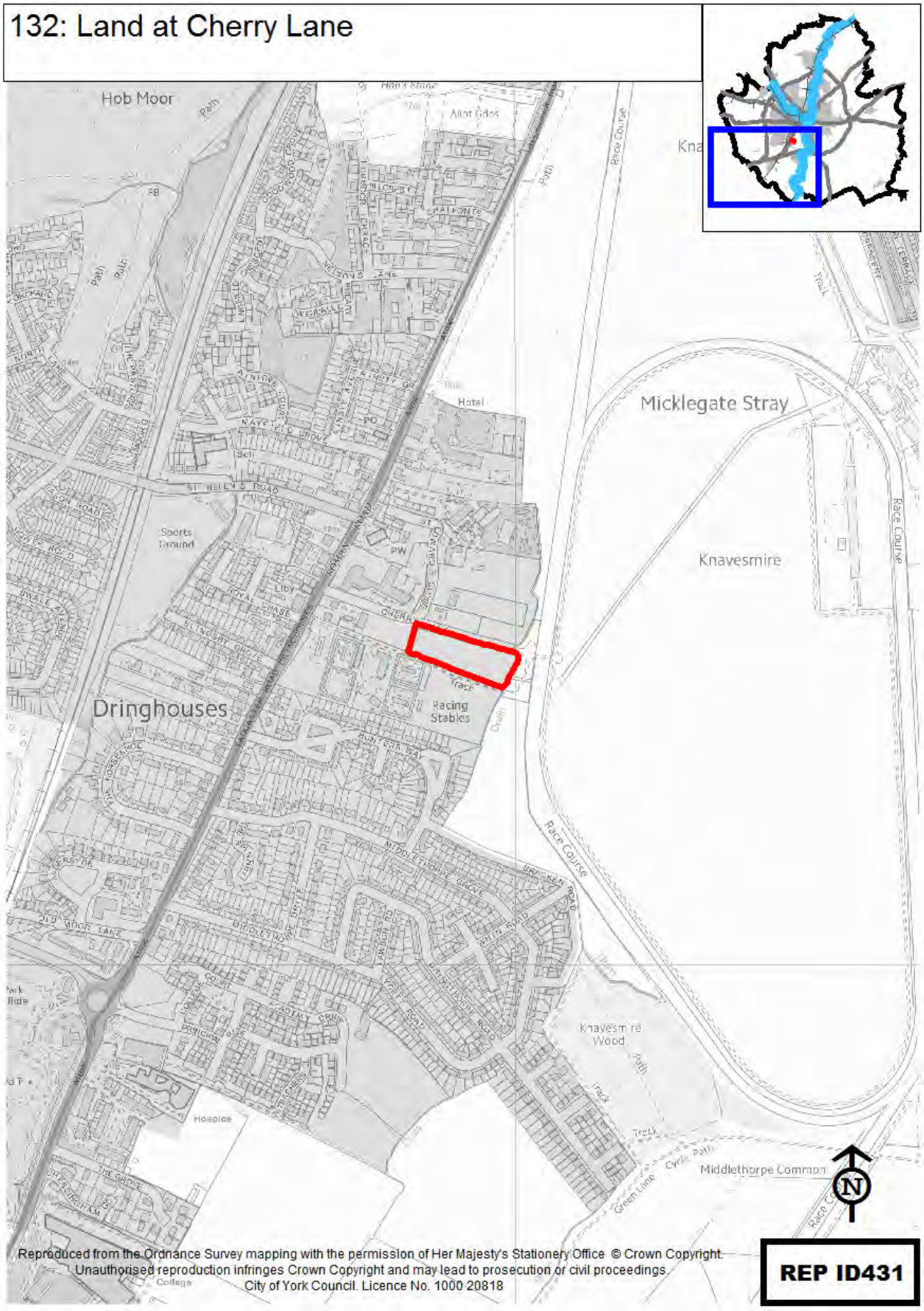
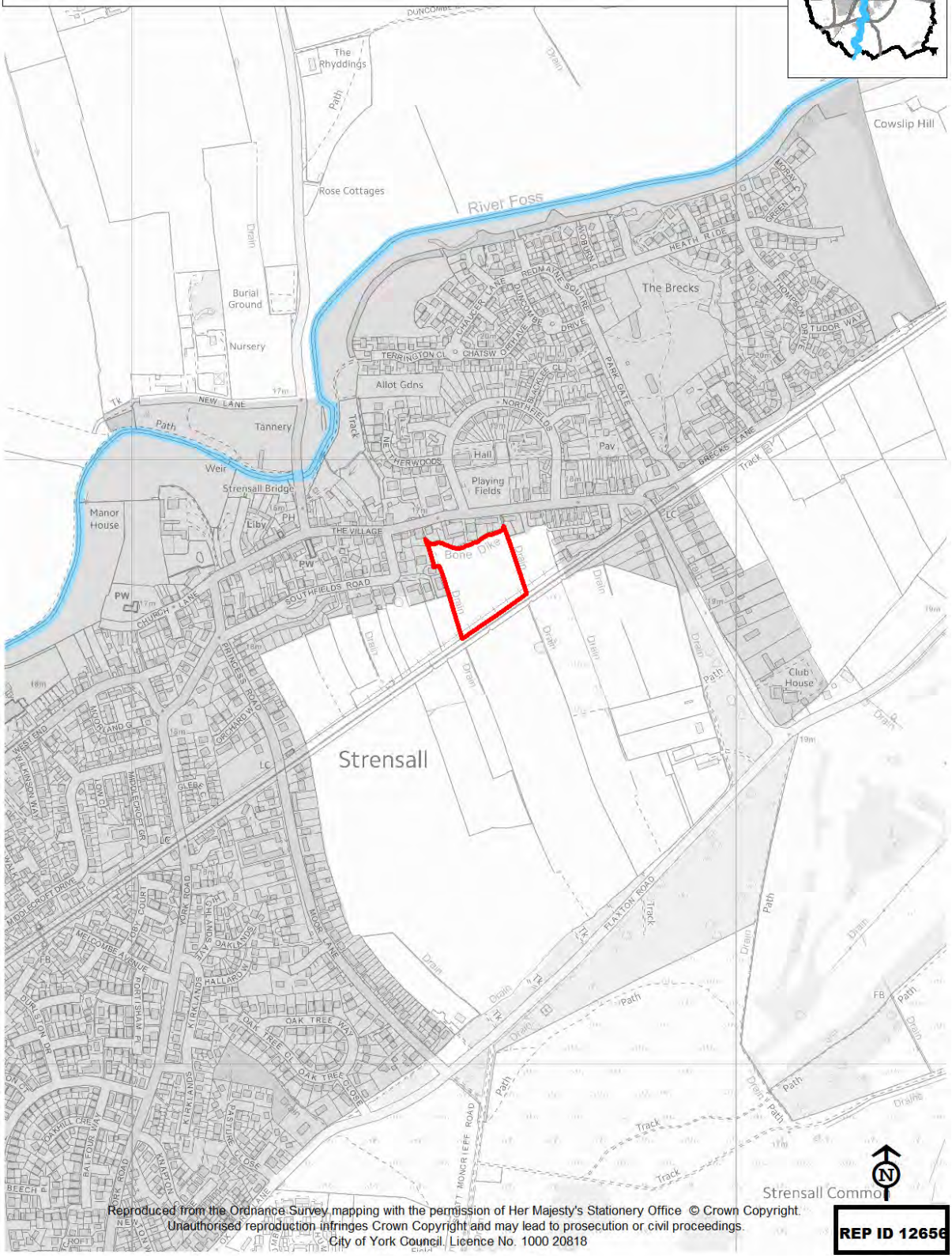
Table 5: Alternative boundaries to Sites which are not accepted (please refer to the Consultation Statement attached as Annex 6 to this report)

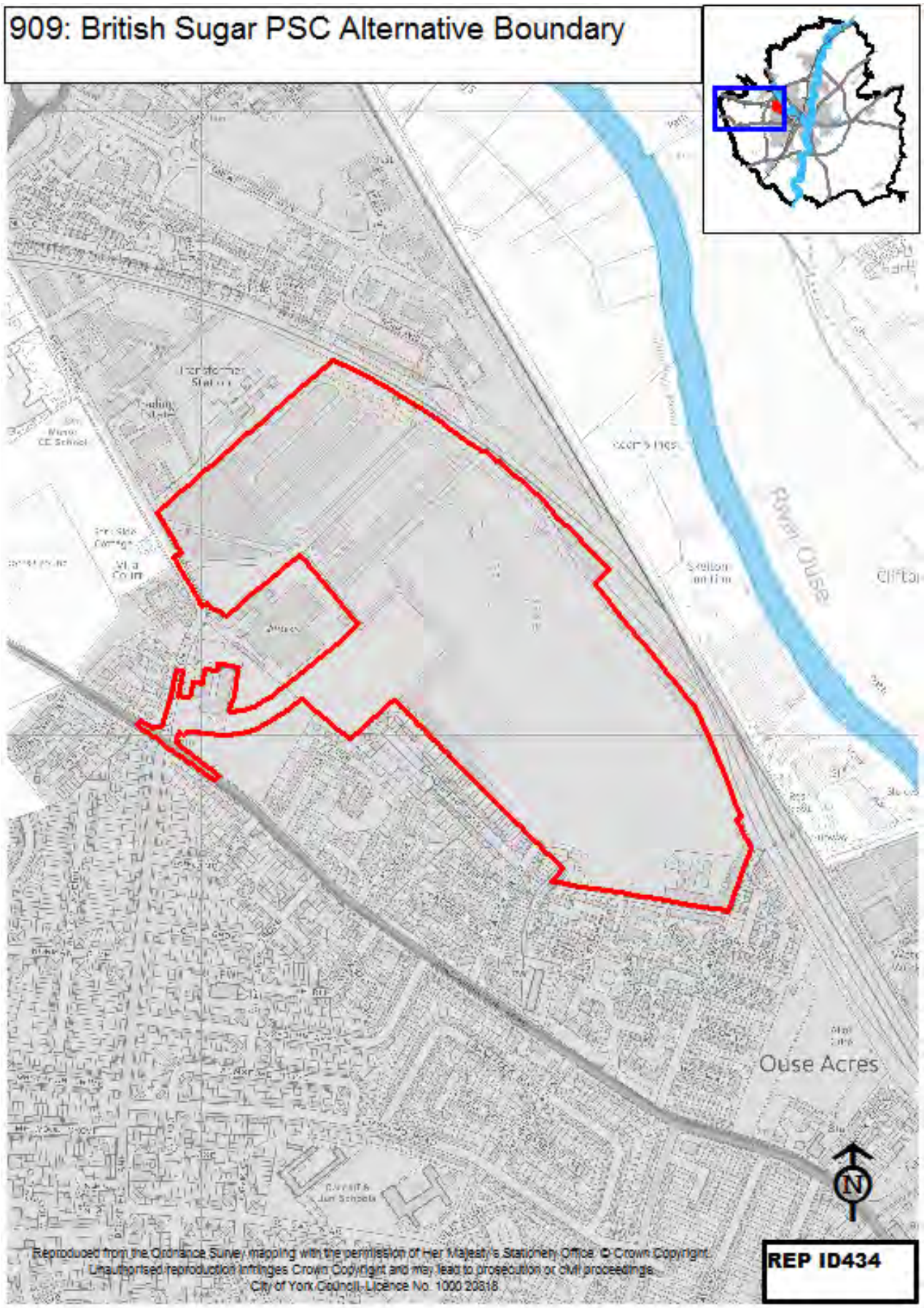
H2b	Site 132 Land at Cherry Lane (H2b)	
H30	Site 901 Land between village and railway line, Strensall	Alternative boundary of previously considered site
ST1	Site 909 British Sugar	Alternative boundary of previously considered site
ST7	Site 876 Land to the South of ST7	Alternative boundary of previously considered site
	Site 912 ST7 Alternative Land-Stockton Ln to Bad Bargain Ln	Alternative boundary of previously considered site
	Site 933 ST7 Alternative Boundary	Alternative boundary of previously considered site
ST8	Site 905 ST8 Alternative boundary	Alternative boundary of previously considered site
	Site 914 ST8 Alternative Land to North and Nature Reserve	Alternative boundary of previously considered site
	Site 913 Land North of Monks Cross	Alternative boundary of previously considered site
ST14	Site 915 ST14 Alternative Option 1350 Homes	Alternative boundary of previously considered site
	Site 916 ST14 Alternative Option	Alternative boundary of previously considered site
ST15	Site 821 Whinthorpe FSC Allocation	Alternative boundary of previously considered site
	Site 877 Alternative boundary for ST15	Alternative boundary of previously considered site
	Site 888 Land to SW of ST15	Alternative boundary of previously considered site
	Site 924 ST15 Langwith with Elvingotn Airfield	Alternative boundary of previously considered site
ST16	Site 928 Land surrounding Terrys car park	Alternative boundary of previously considered site
	Sites 917 918 919 920 and 920	Original submission – superseded.
	Sites at Queen Elizabth Barracks Strensall	Original submission
	Sites 624/937/939/943 at Imphall Barracks	Original submission

Annex 3: Officers Assessment of Housing Sites following PSC



901: Land between The Village and the railway line Strensall




909: British Sugar PSC Alternative Boundary
River Ouse
Ouse Acres
N
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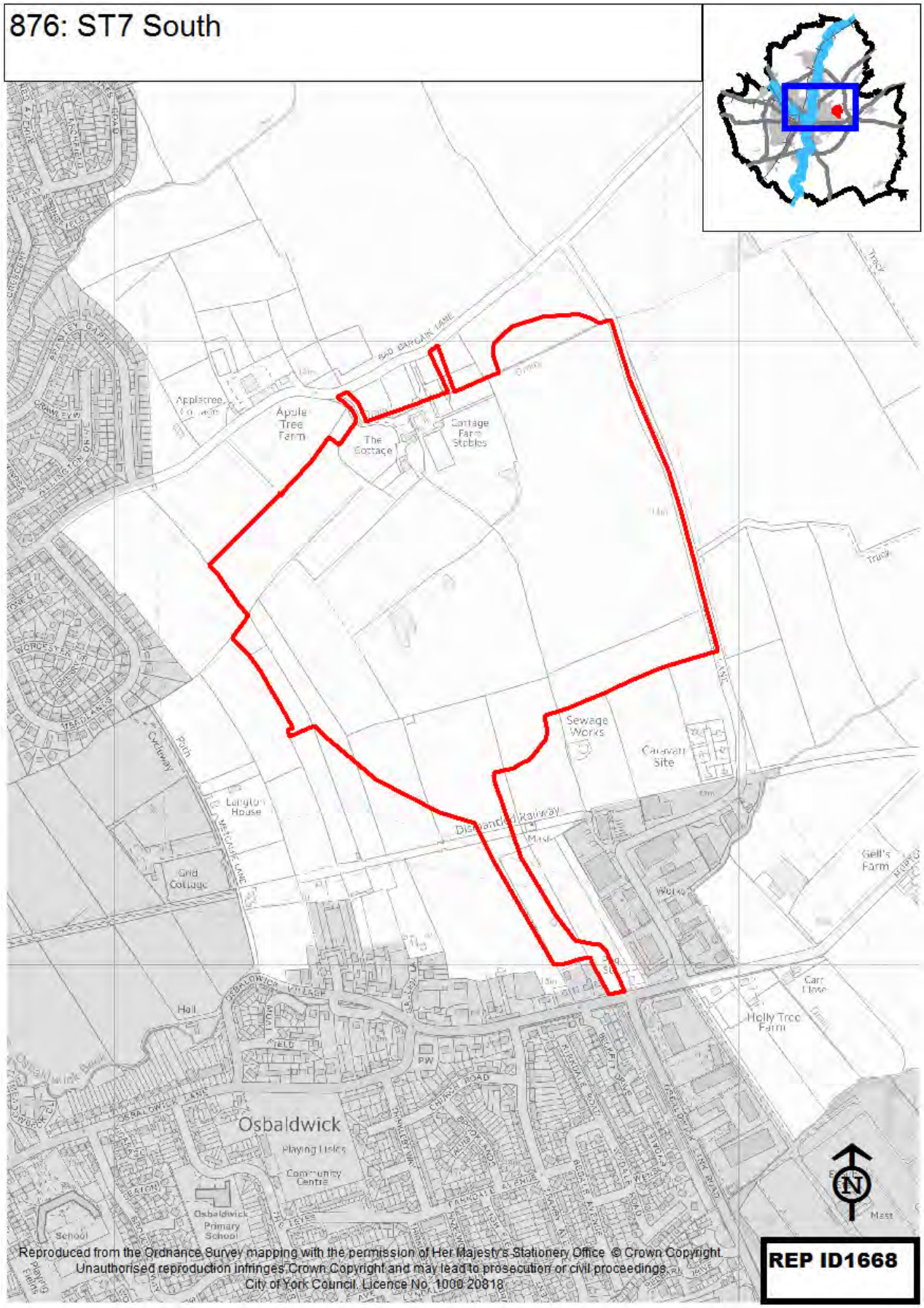
876: ST7 South
Apple Tree Farm
The Cottage
Cottage Farm Stables
Sewage Works
Caravan Site
Langton House
Grid Cottage
Gell's Farm
Holly Tree Farm
Osbaldwick
Playing Fields
Community Centre
Osbaldwick Primary School
Hall
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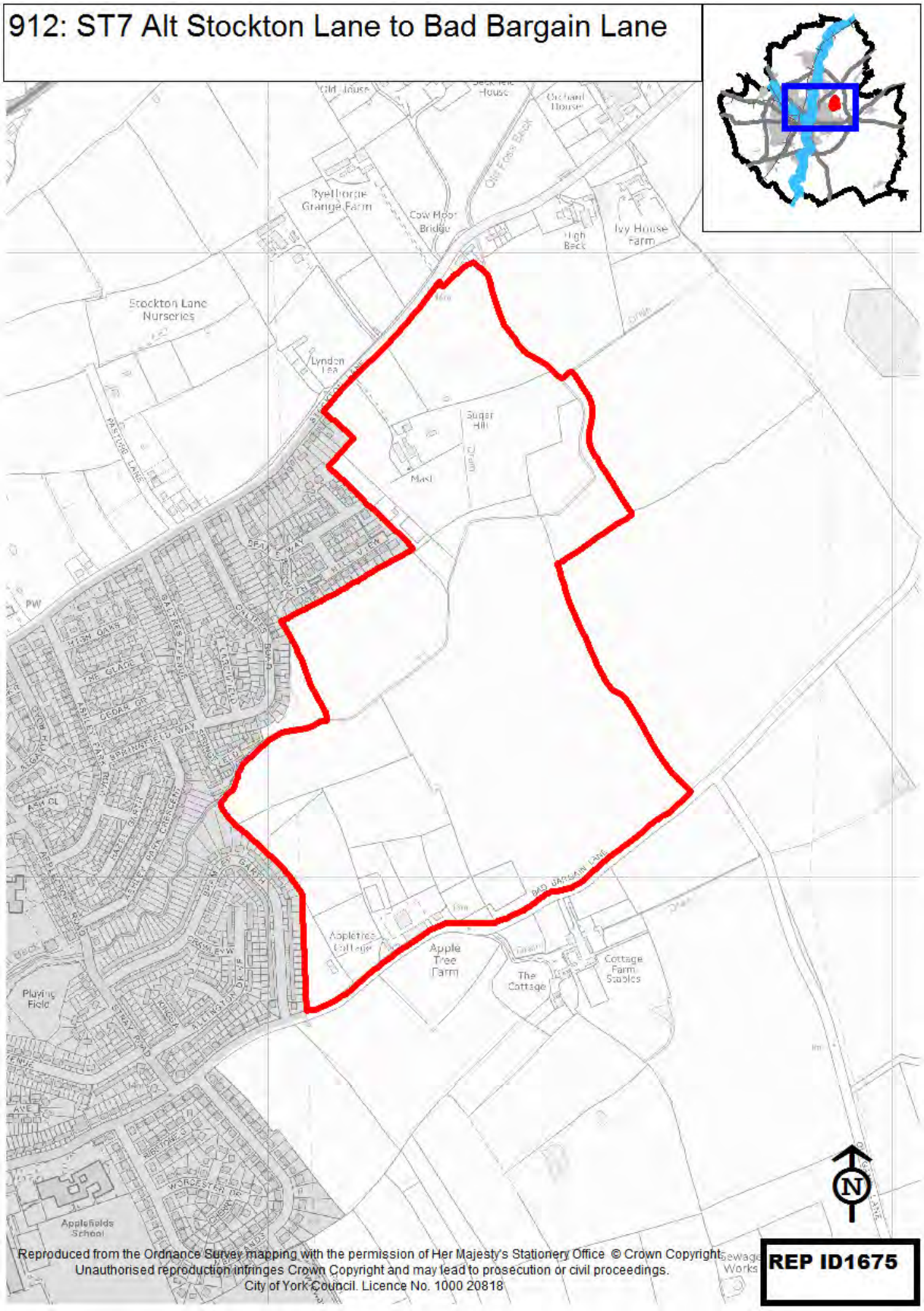
912: ST7 Alt Stockton Lane to Bad Bargain Lane
Ryelbergh Grange Farm
Cow Moor Bridge
Old Foss Beck
High Beck
Ivy House Farm
Stockton Lane Nurseries
Lynden Lea
Sugar Hill
Mast
Bad Bargain Lane
Appletree Cottage
Apple Tree Farm
The Cottage
Cottage Farm Stables
Playing Field
Applefields School
Sewage Works
N
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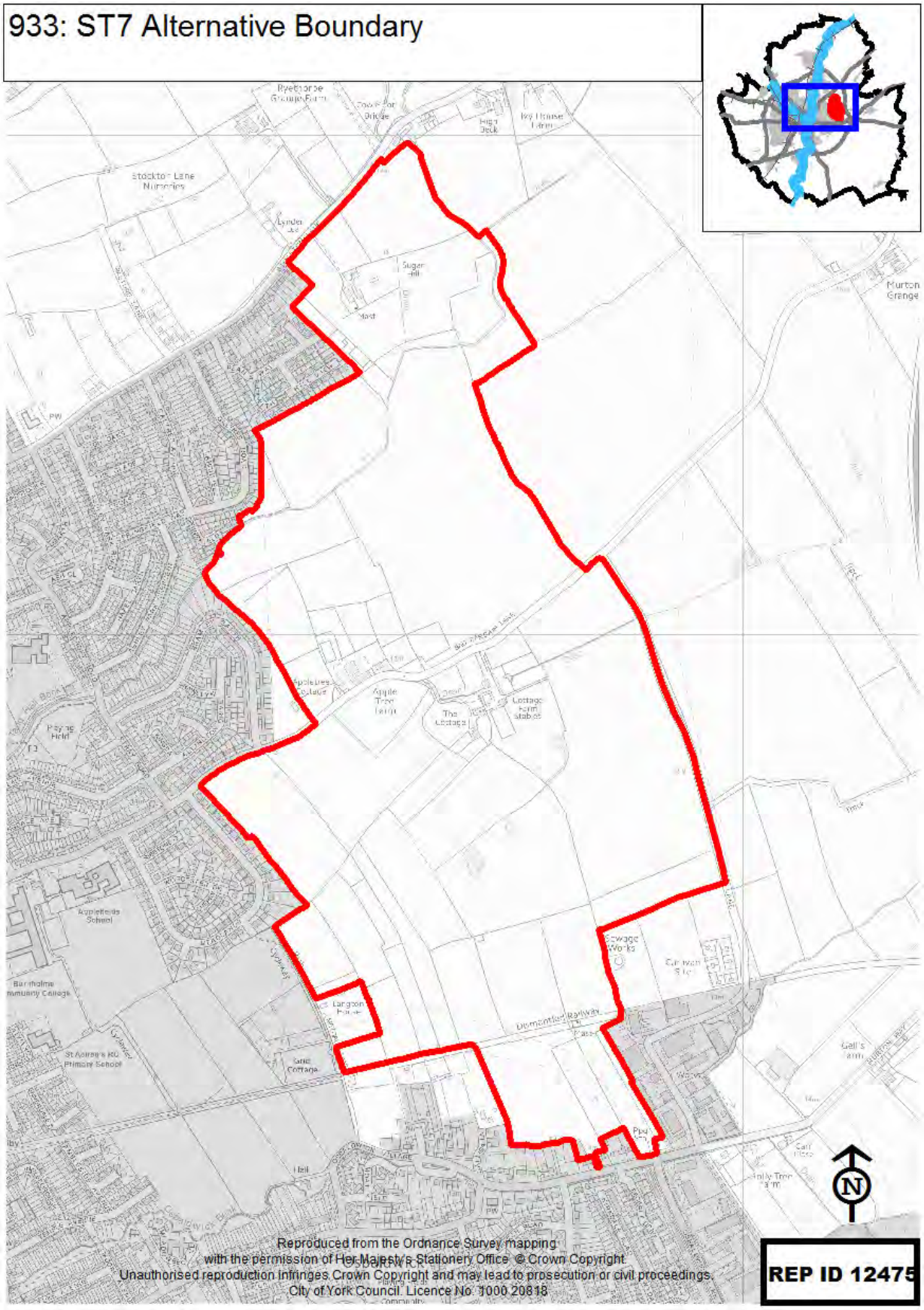
933: ST7 Alternative Boundary
Stockton Lane Nurseries
Sugar Hill
Murton Grange
Apple Tree Farm
The Cottage
Cottage Farm Stables
Applethorpe School
Barnholme Community College
St Aidan's RC Primary School
Sewage Works
Dismantled Railway
Gate Cottage
Gill's Farm
Holly Tree Farm
N
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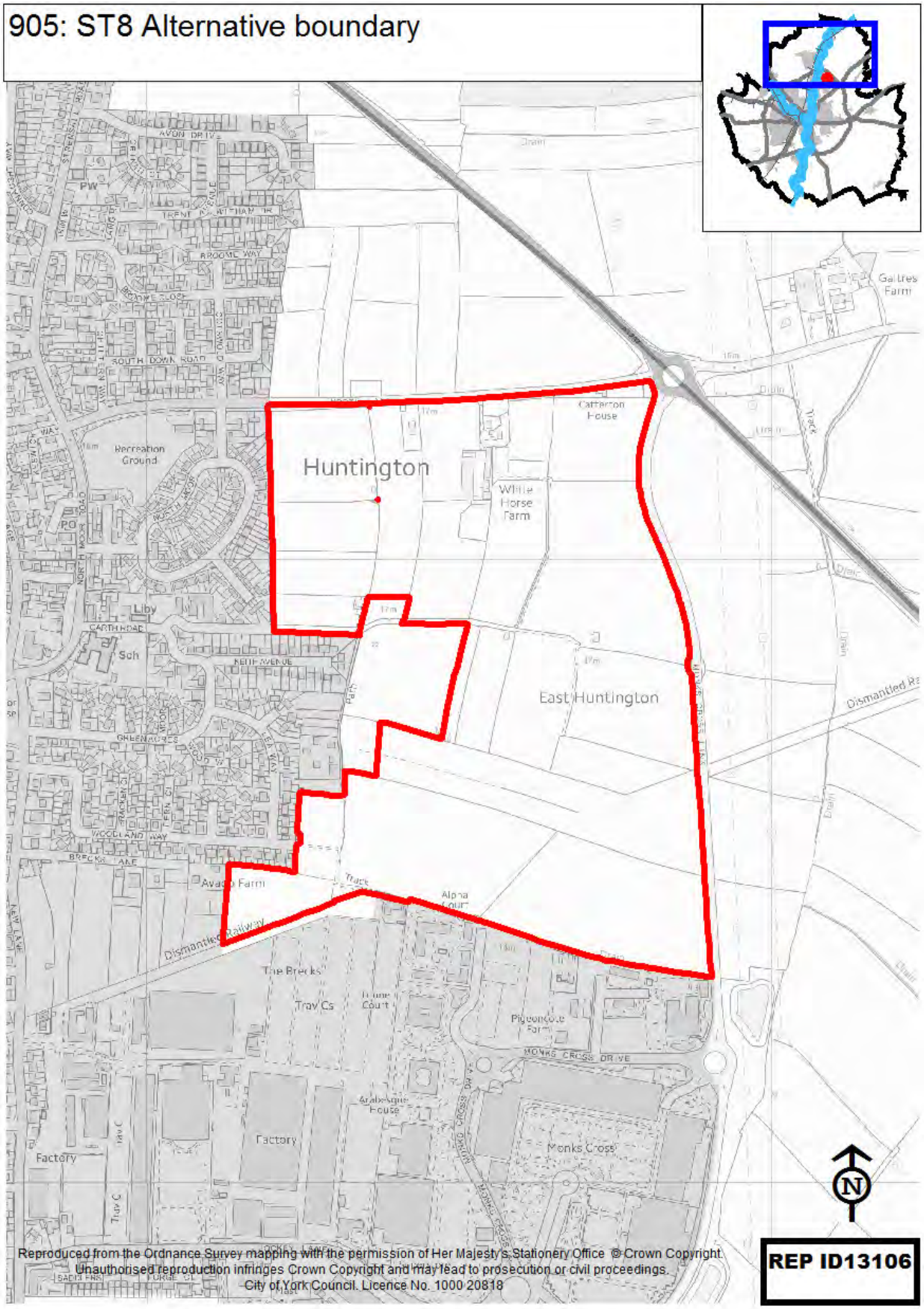
905: ST8 Alternative boundary
Huntington
East Huntington
White Horse Farm
Catterton House
Recreation Ground
Liby
Sch
Avalon Drive
Broome Way
South Down Road
Keith Avenue
Greenacres
Woodland Way
Avalon Farm
Dismantled Railway
The Brecks
Trav Cs
Pigeoncote Farm
Monks Cross Drive
Monks Cross
Factory
Factory
Gallows Farm
Dismantled Rail
N
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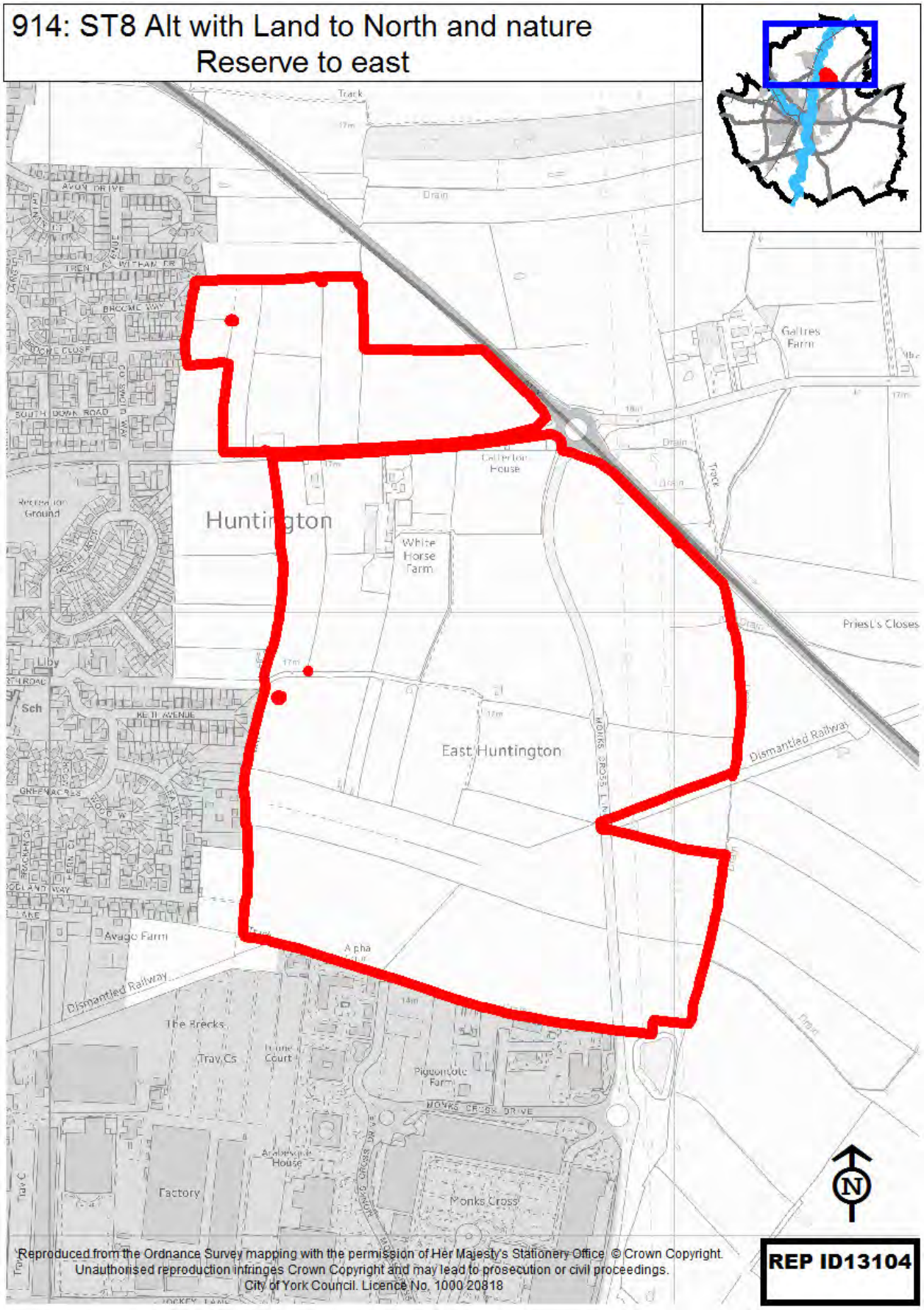
914: ST8 Alt with Land to North and nature Reserve to east
Huntington
East Huntington
Gallires Farm
White Horse Farm
Priest's Closes
Dismantled Railway
Monks Cross
Factory
Monks Cross Drive
Avago Farm
The Brecks
Pigeoncote Farm
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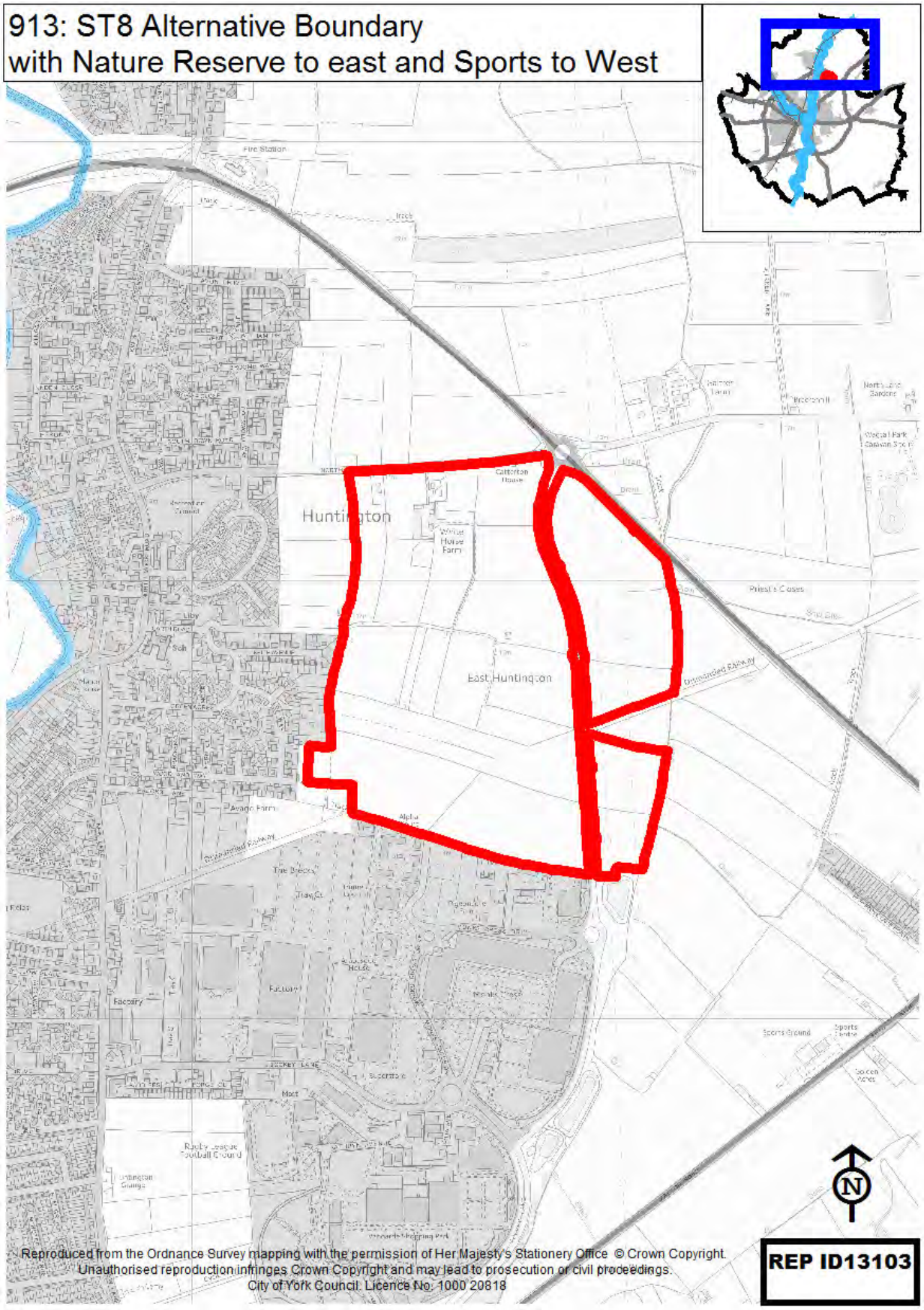
913: ST8 Alternative Boundary
with Nature Reserve to east and Sports to West
Huntington
East Huntington
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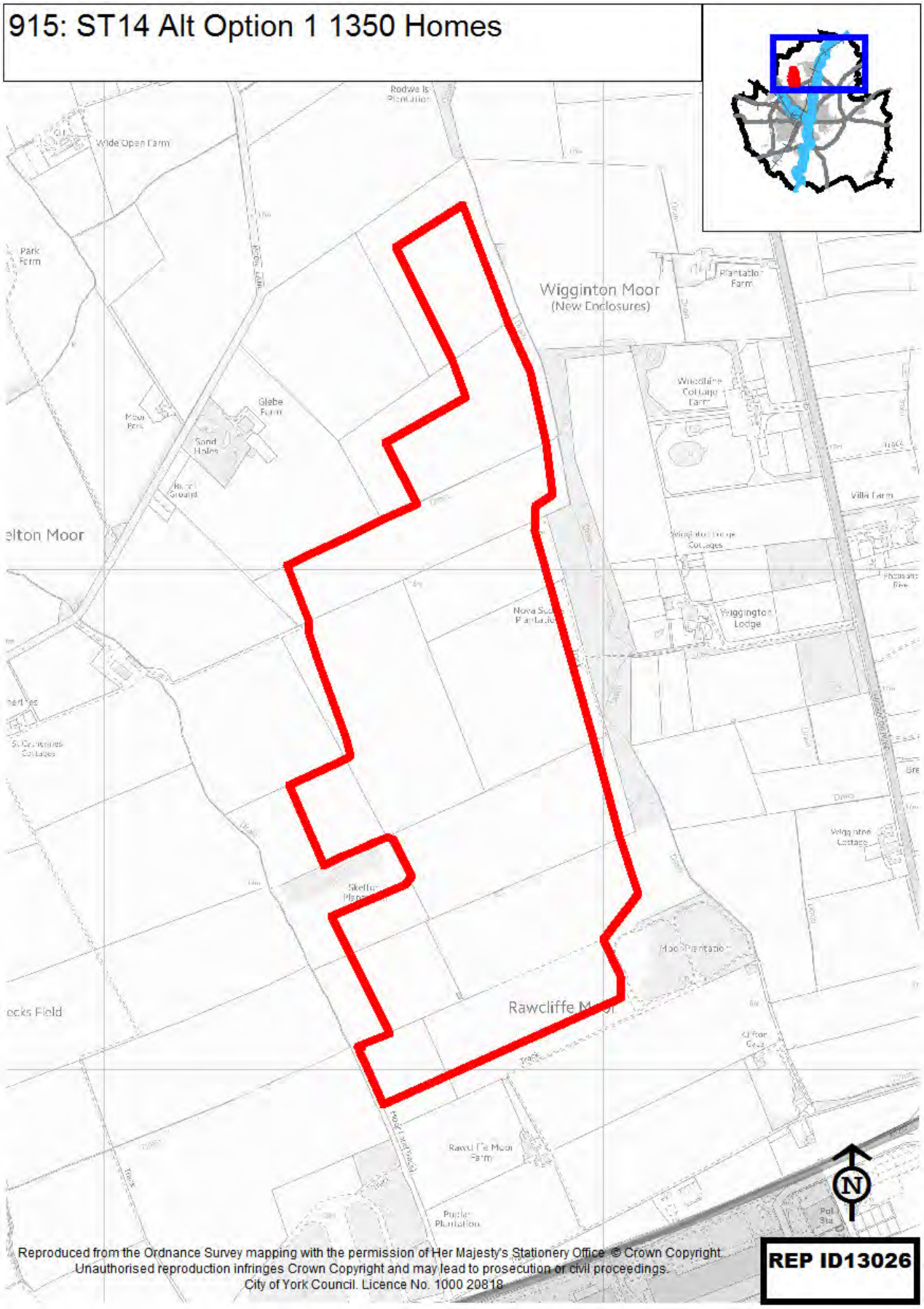
915: ST14 Alt Option 1 1350 Homes
Wide Open Farm
Park Farm
Wigginton Moor
(New Enclosures)
Plantation Farm
Glebe Farm
Sand Holes
Wigginton Lodge
Rawcliffe Moor
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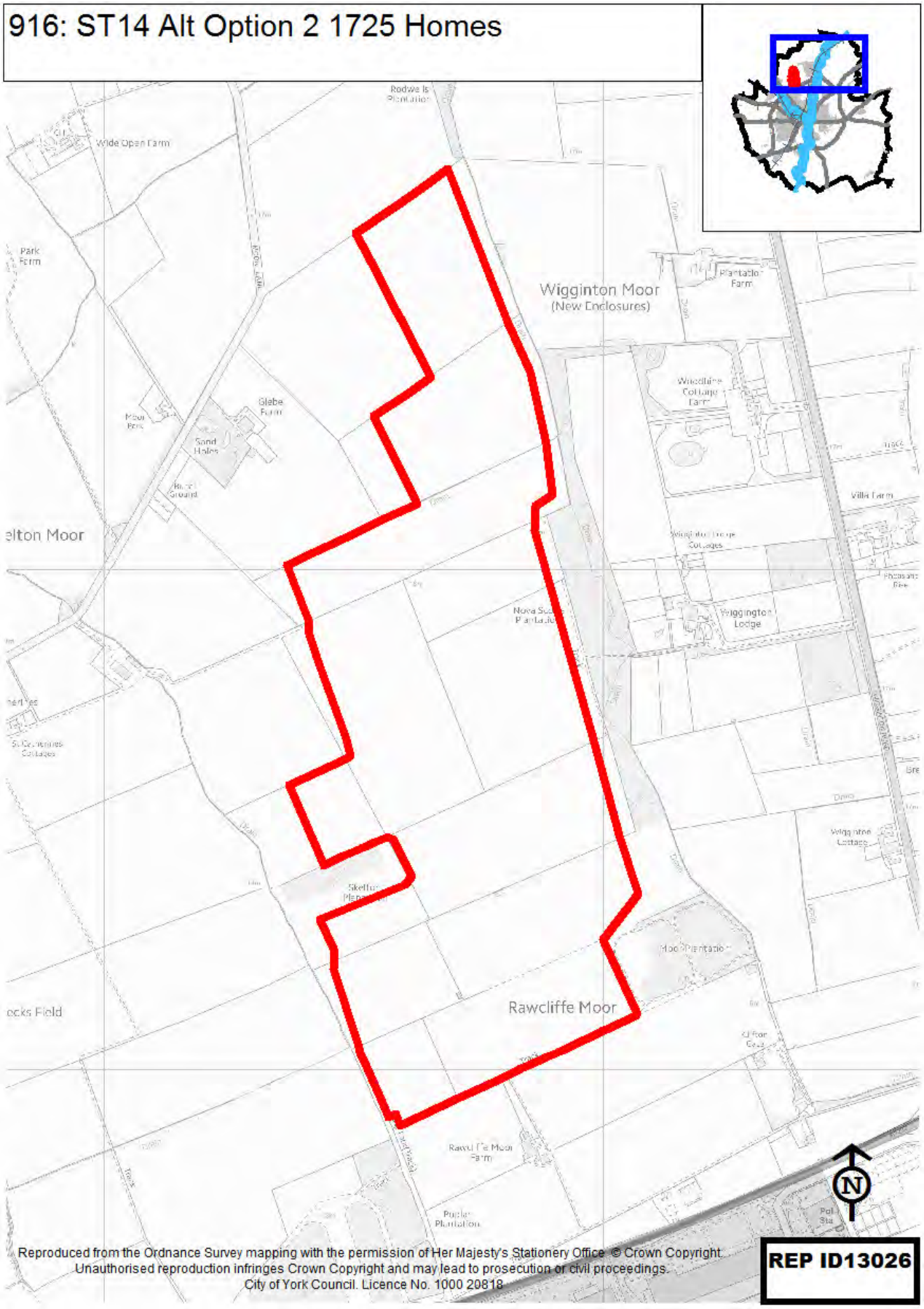
916: ST14 Alt Option 2 1725 Homes
Wide Open Farm
Park Farm
Wigginton Moor
(New Enclosures)
Plantation Farm
Glebe Farm
Sand Holes
elton Moor
Wigginton Lodge
Rawcliffe Moor
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821 Whinthorpe FSC Allocation
A64
Heslington
Derwent Nurseries
Clock Farm Bungalow
Ox-Close Farm
Spring Field
Tillmire Drain
Grange Farm
Prospect Farm
Primrose Hill Farm
White House Farm
Till Mire
Whin Covert
Coppers Plantation
Langwith Lodge
Heslington Common
Tillmire Farm
Elvington Airfield
Fir Tree Farm
Blackwoods Farm
Wheldrake Wood
Link Hall Cottages
Lockwood's Plantation
N
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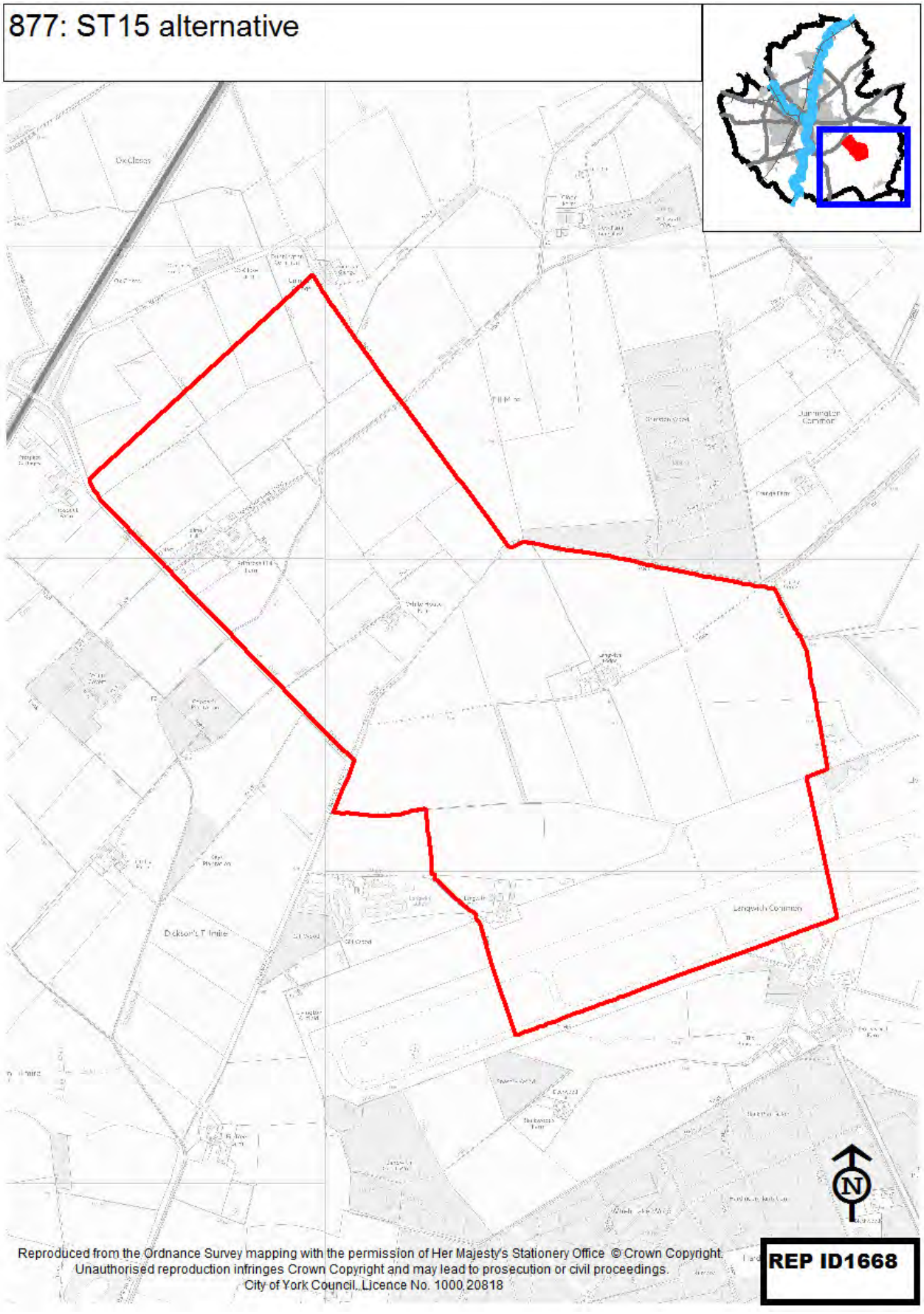
877: ST15 alternative
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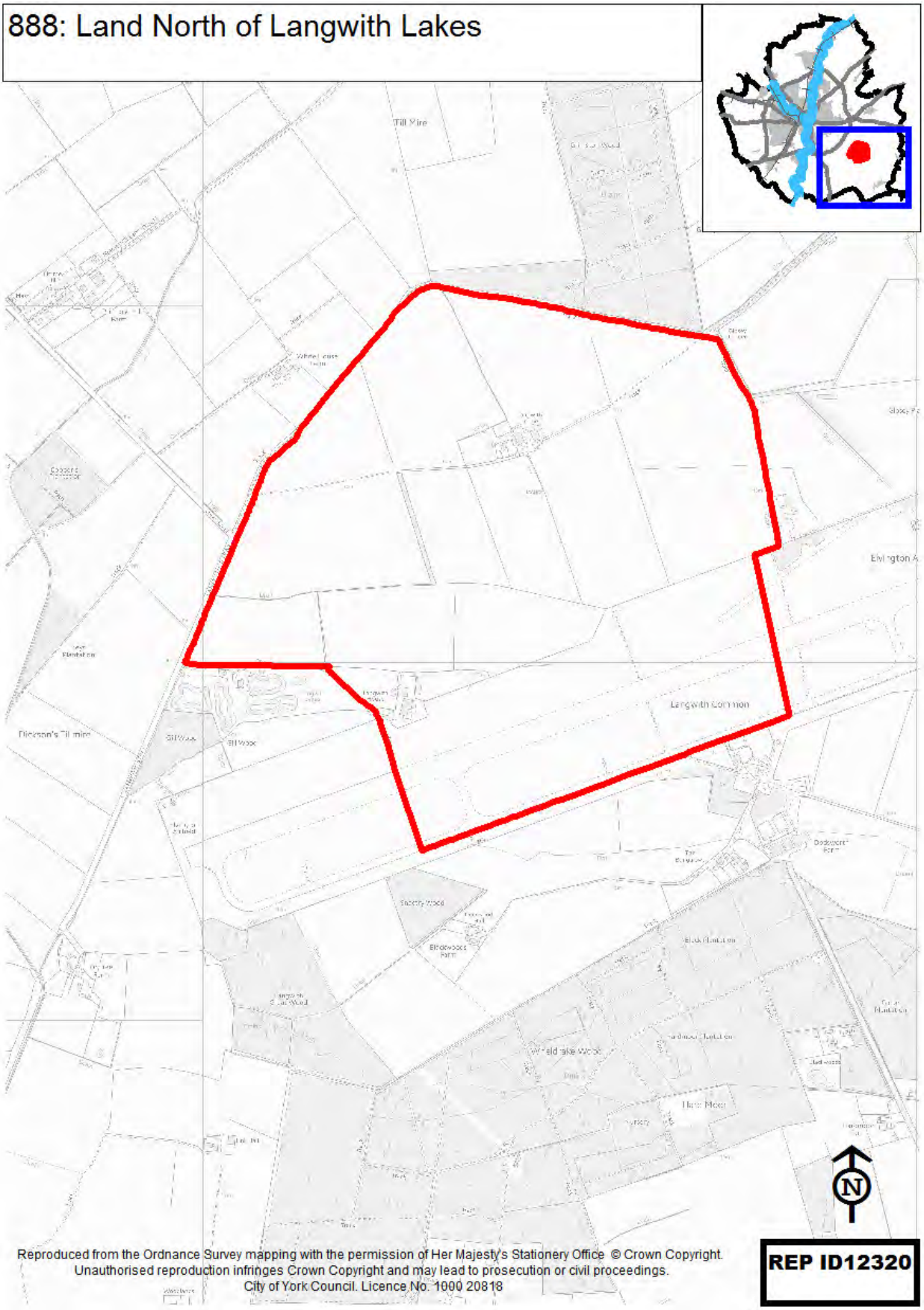
888: Land North of Langwith Lakes



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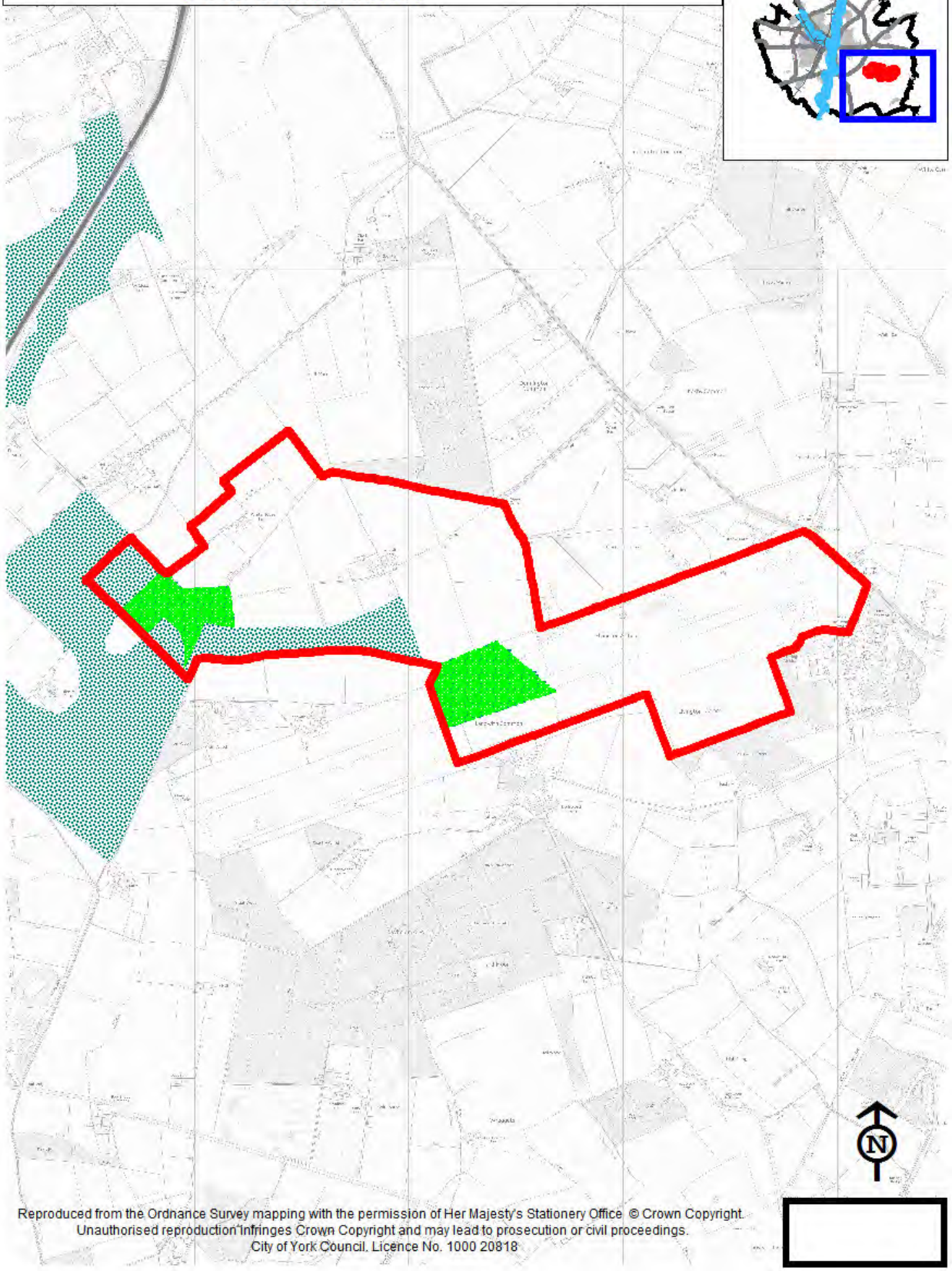
924: ST15 Langwith and Elvington Airfield PSC Submission



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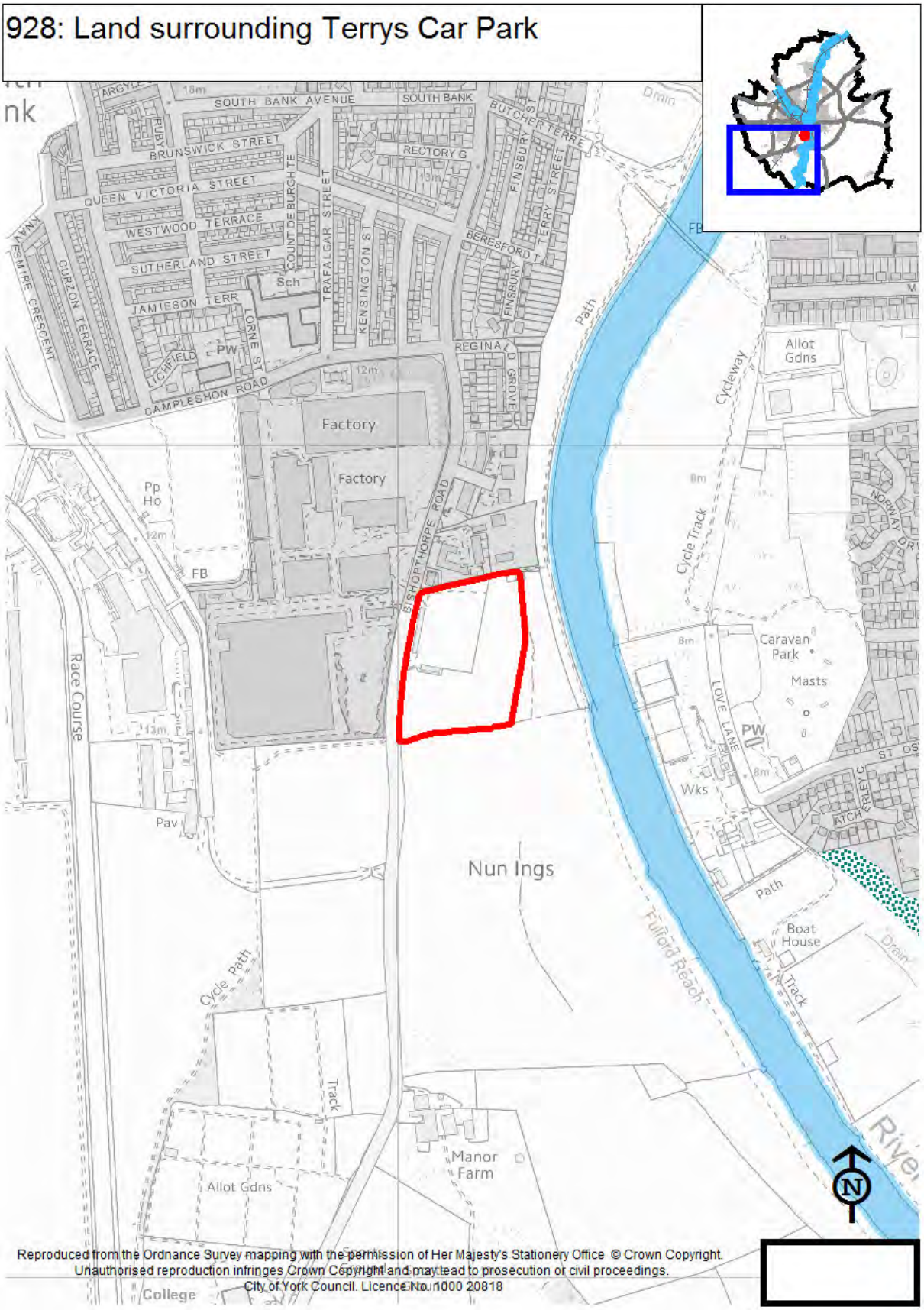
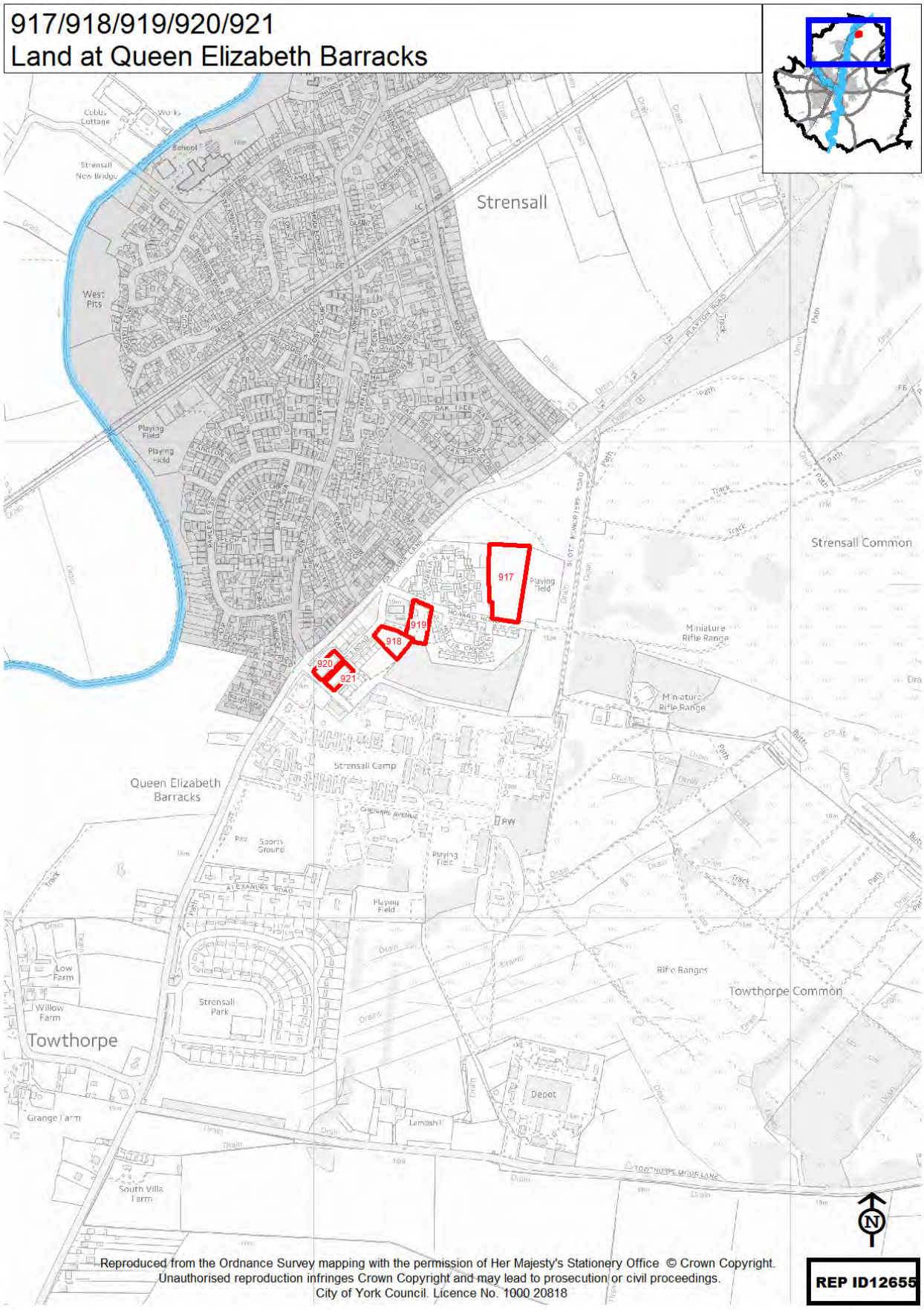
928: Land surrounding Terrys Car Park




917/918/919/920/921
Land at Queen Elizabeth Barracks
Strensall
Strensall Common
Queen Elizabeth Barracks
Towthorpe
Towthorpe Common
Strensall Camp
Miniature Rifle Range
Rifle Ranges
Depot
Playing Field
Sports Ground
Strensall Park
West Pits
Grange Farm
Low Farm
Willow Farm
South Villa Farm
917
918
919
920
921
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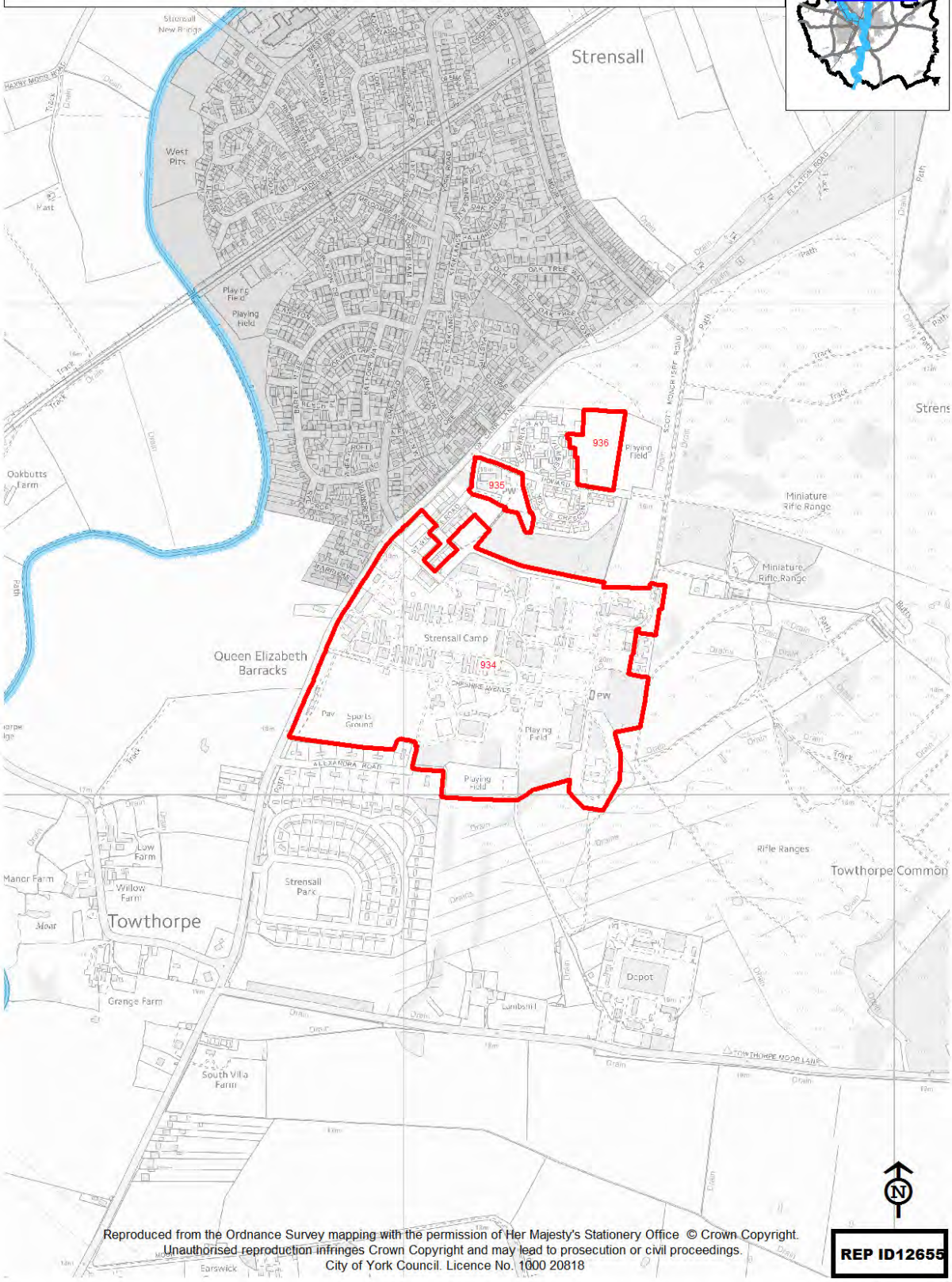
934/935/936: Queen Elizabeth Barracks Strensall



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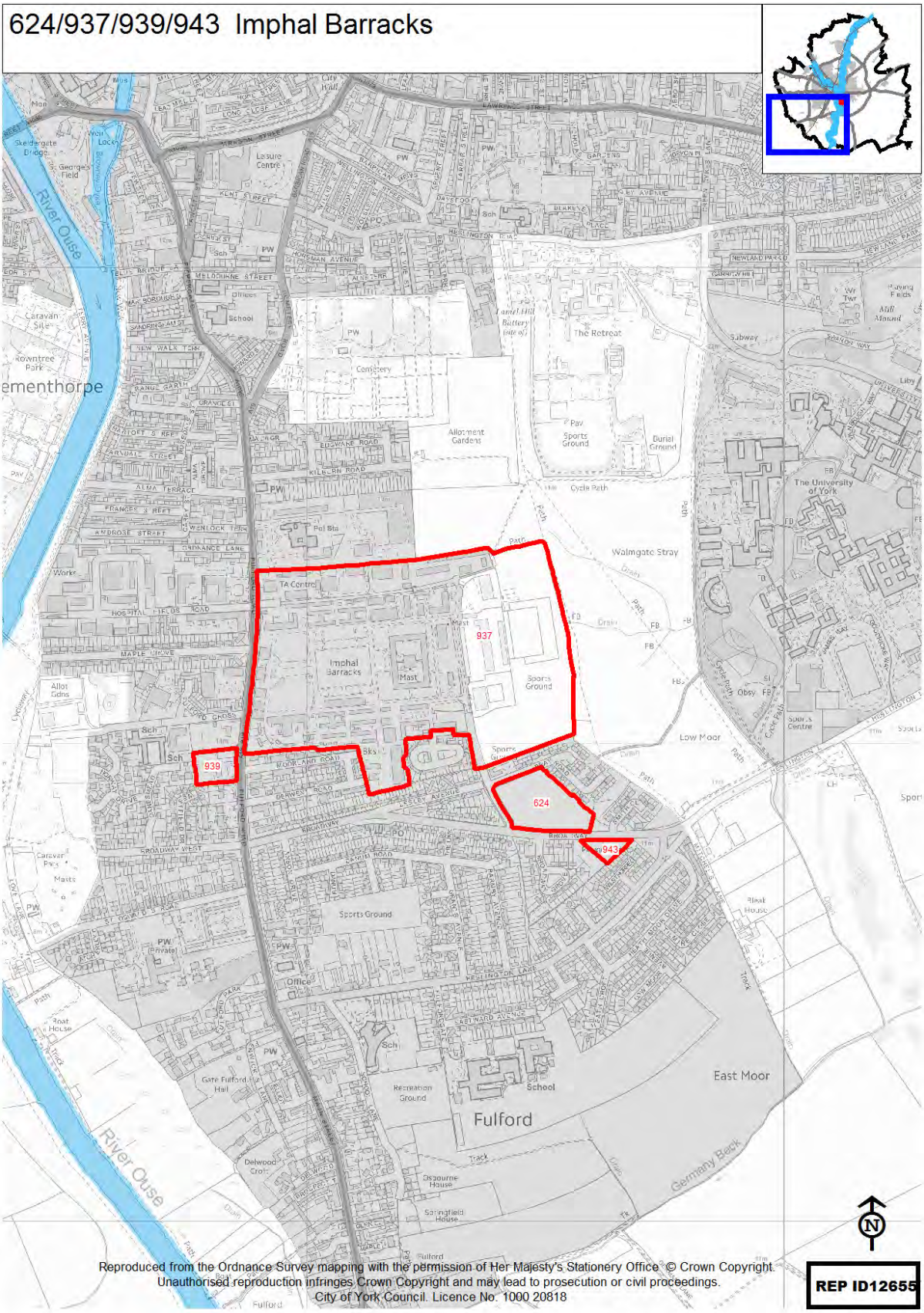
624/937/939/943 Imphal Barracks



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Annex 3: Officers Assessment of Housing Sites following PSC

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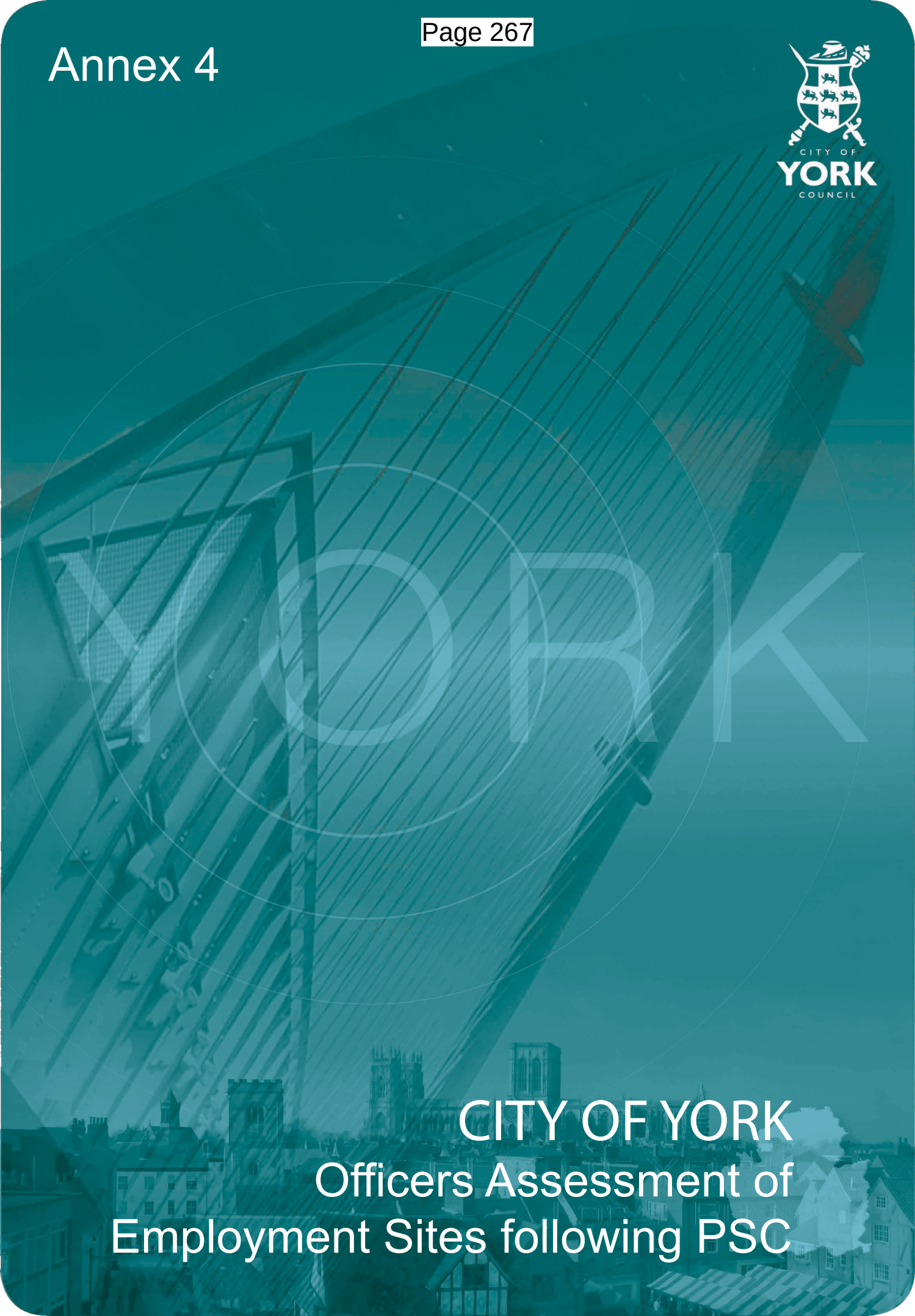
Annex 4



CITY OF YORK
Officers Assessment of Employment Sites following PSC

Annex 4: Officers Assessment of Employment Sites following PSC

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TABLE 1 - OFFICER ASSESSMENT OF TECHNICAL EVIDENCE - NO OR MINOR CHANGES SUGGESTED TO PSC POSITION 2

TABLE 2 – OFFICER ASSESSMENT OF TECHNICAL EVIDENCE WHERE ADDITION OR DELETION OF SITES OR BOUNDARY CHANGES COULD BE BENEFICIAL 12

TABLE 3 – OFFICER ASSESSMENT OF TECHNICAL EVIDENCE WHERE ADDITION OF SITES OR BOUNDARY CHANGES NOT ACCEPTED 45

Table 1 - Officer assessment of technical evidence - No or minor changes suggested to PSC position

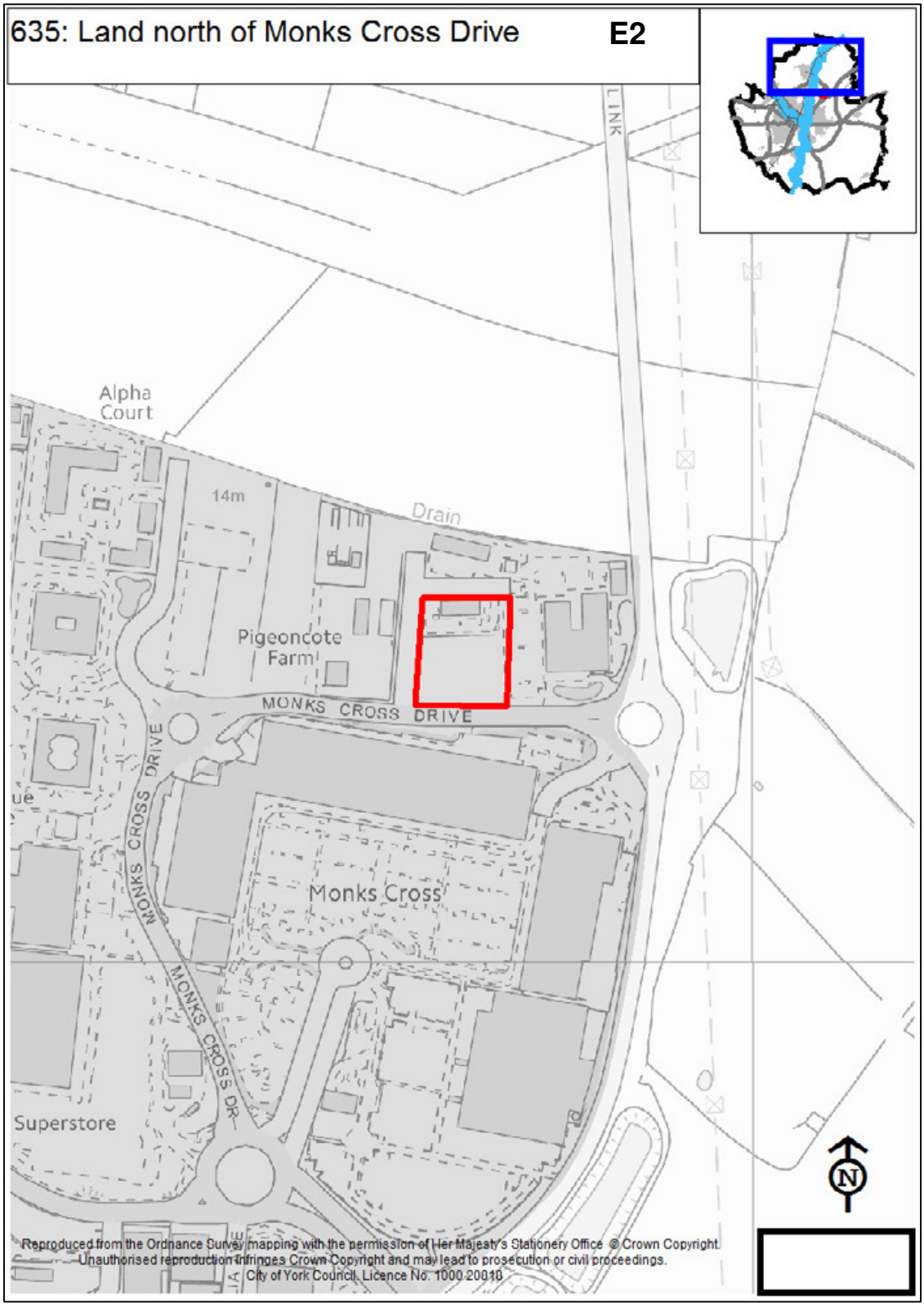
Allocation Ref	Site Name	Officer Commentary
Non Strategic Sites		
E2 (Site 635)	Land North of Monks Cross Drive	**Total Representations: 7** **Supports: 2** **Objections: 3** **Comments: 2** General supports for the site based on it being a brownfield site and infill development in an existing commercial area. Objections relate to the increase in traffic congestion in an area that has already seen significant development over recent years. Planning application (16/00665/FULM) granted and now part complete for electrical retail store, remainder of the site has consent for a drive thru restaurant which is not yet complete. **Officers suggest that the site is removed from the Plan as it is currently under construction.**
E8 (site 600)	Wheldrake Industrial Estate	**Total Representations:5** **Supports: 0** **Objections: 5** **Comments: 0** Objection to the site state that the proposed expansion would have an adverse impact on this primary gateway to village as it will be dominated by industrial type buildings. The Wheldrake Conservation area is close to proposed site. This area of grassland greatly enhances the main

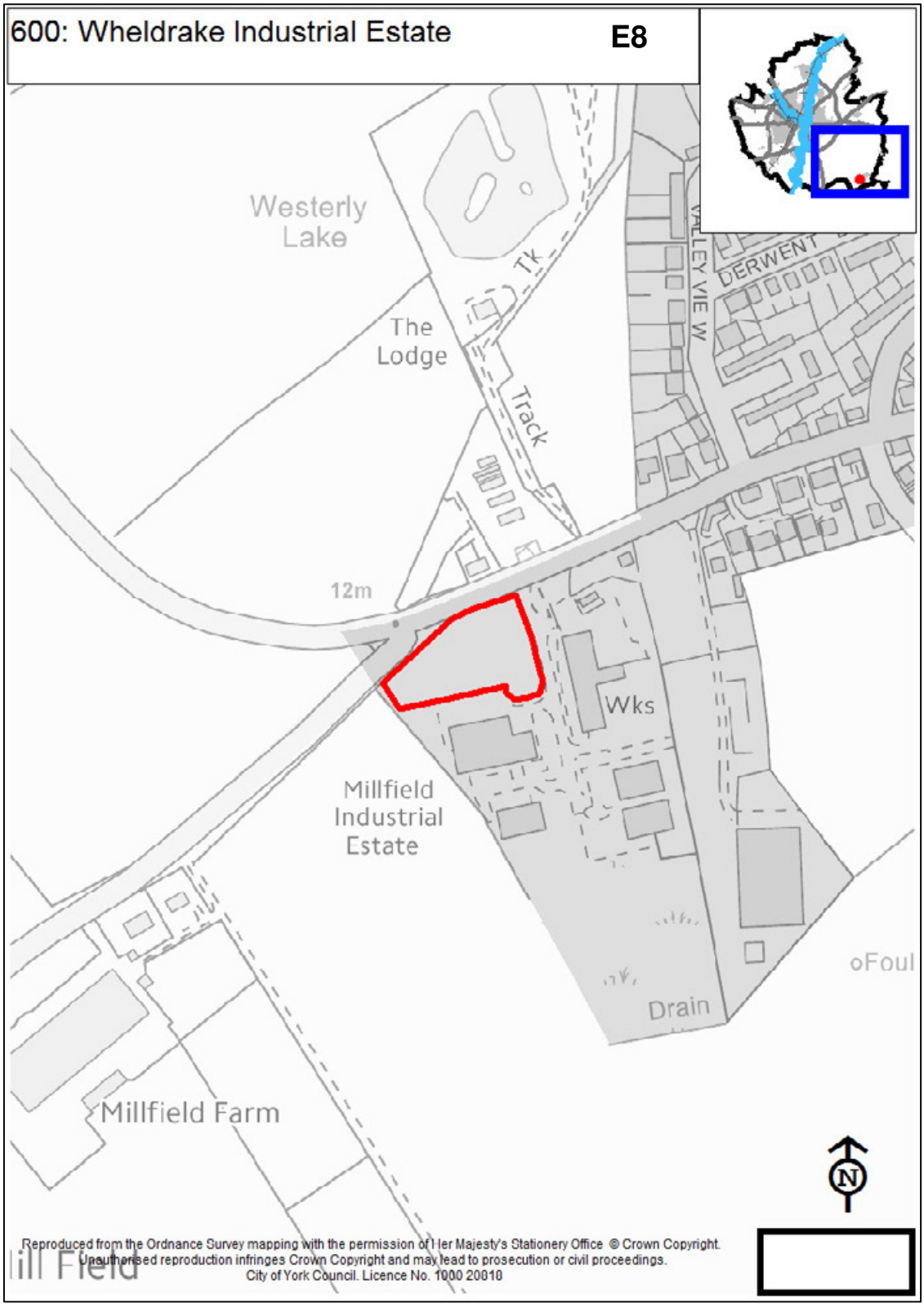
Allocation Ref	Site Name	Officer Commentary
		approach to the village and makes industrial estate less intrusive. Development of the site would degrade the value of historic village street & Conservation Area. The site is located at the entrance to the industrial estate and would provide an infill site suitable for commercial uses. Whilst the Employment Land Review (ELR) ranks the site fairly lowly in terms of market attractiveness the site is a vacant plot within an existing business park and it is considered appropriate to retain as an employment allocation. **Officers suggest that the site is retained as an employment site as per PSC.**
E9 (Site 602)	Elvington Industrial Estate	**Total Representations:13** **Supports: 6** **Objections: 7** **Comments: 1** Number of supports including from the Parish Council. Correction that site is Greenfield rather than brownfield as quoted in PSC. Inclusion of this site is sensible but development should be limited to small units for small, high value businesses. Developer/landowner offers support to the allocation of the site. Strongly support its inclusion as it forms a natural extension to the existing business parks at Elvington Airfield. There is already interest in the site. Therefore the site may be developed and occupied before the Local Plan process has been completed. We believe that further land should be allocated to for development to respond to the on going demand for land in this location. Objections to the site concern residential amenity issues. They state that there are already noise and air pollution in the area and huge volumes of traffic. This proposal will only add to the problems with more noise, pollution etc. Suggest proposal be dismissed on these grounds as well as on safety to children walking this route to school and playground and doctors surgery.

Allocation Ref	Site Name	Officer Commentary
		The site would provide an infill opportunity and it is considered that objections raised regarding residential amenity could be dealt with through the detailed planning process for any proposal. It is considered appropriate to retain this site as an employment allocation within the plan. **Officers suggest that the site is retained as an employment site as per PSC.**
E10 (Site 706)	Chessingham Park, Dunnington	**Total Representations:4** **Supports: 3** **Objections: 1** **Comments: 0** Supports from the Parish Council and members of the public as this develops a currently derelict site which is infill development. Objection states that there are empty units already so why build more. The site is located within the existing business park and would provide a small infill site suitable for employment uses. **Officers suggest that the site is retained as an employment site as per PSC.**
E11 (Site 639)	Annamine Nurseries, Jockey Lane, Huntington	**Total Representations:3** **Supports: 1** **Objections: 1** **Comments: 1** Support for the re-development of brownfield land Objection relates to the traffic growth along Brockfield Road and Brockfield Park Drive. Must be a traffic alleviation plan to prevent the residential area becoming inhabitable.. Dualling of the ring road would be the favoured option and/or a new road linking H146 through to the head of

Allocation Ref	Site Name	Officer Commentary
E11 cont.. (Site 639)		New Lane with Huntington Road. Representation received from planning agent on behalf of landowner/developer. Support the proposed allocation of E11 in the Local Plan but object to the range of employment uses being restricted to B1c, B2 and B8 (including an element of B1a if associated with existing uses) only. Request that the range of suitable land uses appropriate on the site be amended to include all of the traditional employment uses B1a/b/c B2 and B8. **Officers consider that the site should be retained as an employment site and that the proposed uses could be widened to include B1(a) office to offer greater flexibility.**
E12 (Site 684)	York Business Park	**Total Representations:1** **Supports: 1** **Objections: 0** **Comments: 0** Support for infill development in existing built-up area. Application 16/00179/FULM granted for erection of motor vehicle dealership with associated parking and display. Currently under construction. **Officers suggest that the site is removed from the Plan as it is currently under construction.**

Annex 4: Officers Assessment of Employment Sites following PSC




600: Wheldrake Industrial Estate
E8
Westerly Lake
TK
The Lodge
Track
VALLEY VIE W
DERWENT
12m
Wks
Millfield Industrial Estate
Drain
oFoul
Millfield Farm
N
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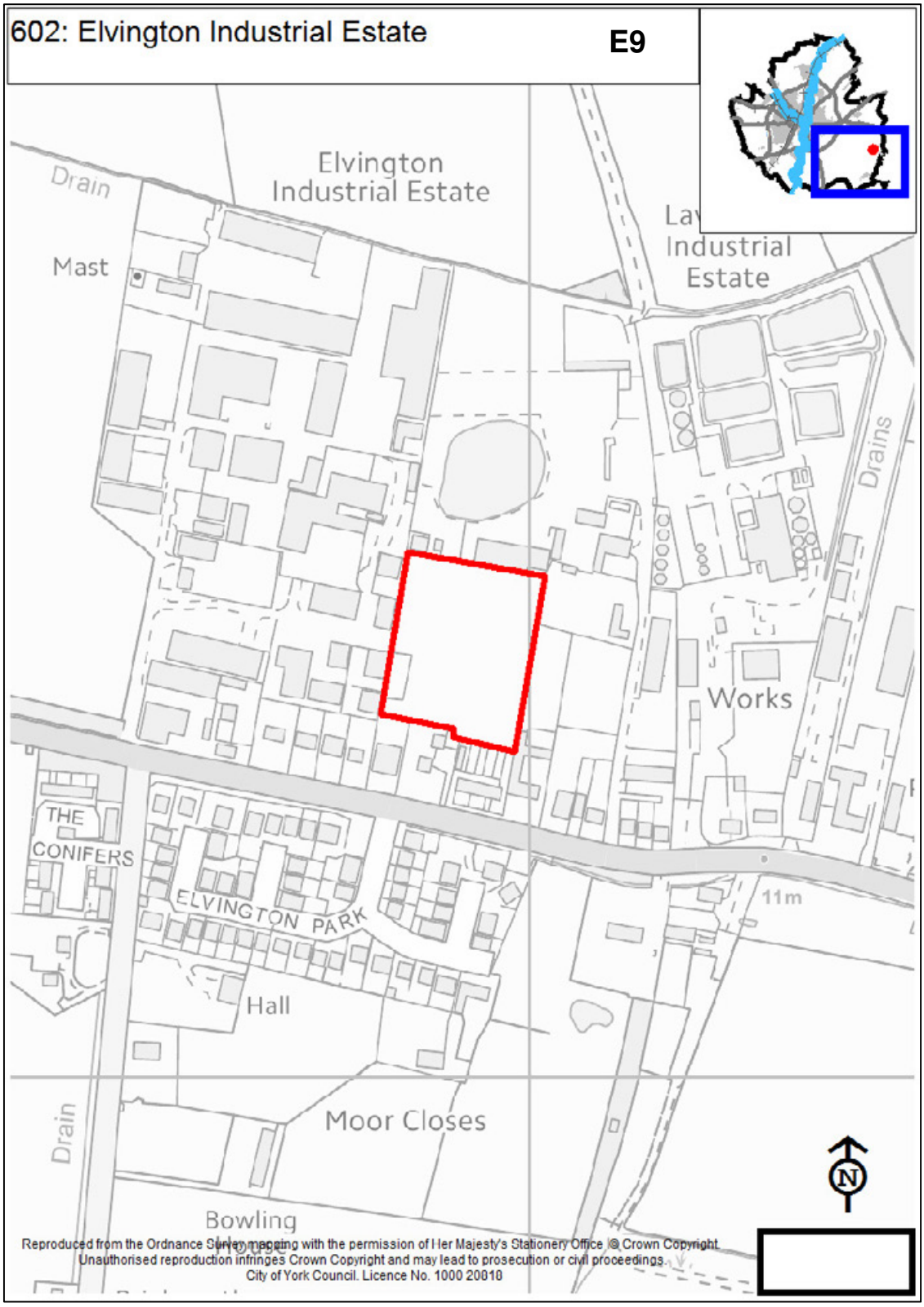
602: Elvington Industrial Estate
E9
Elvington Industrial Estate
Drain
Mast
Industrial Estate
Drains
Works
THE CONIFERS
ELVINGTON PARK
11m
Hall
Moor Closes
Drain
Bowling
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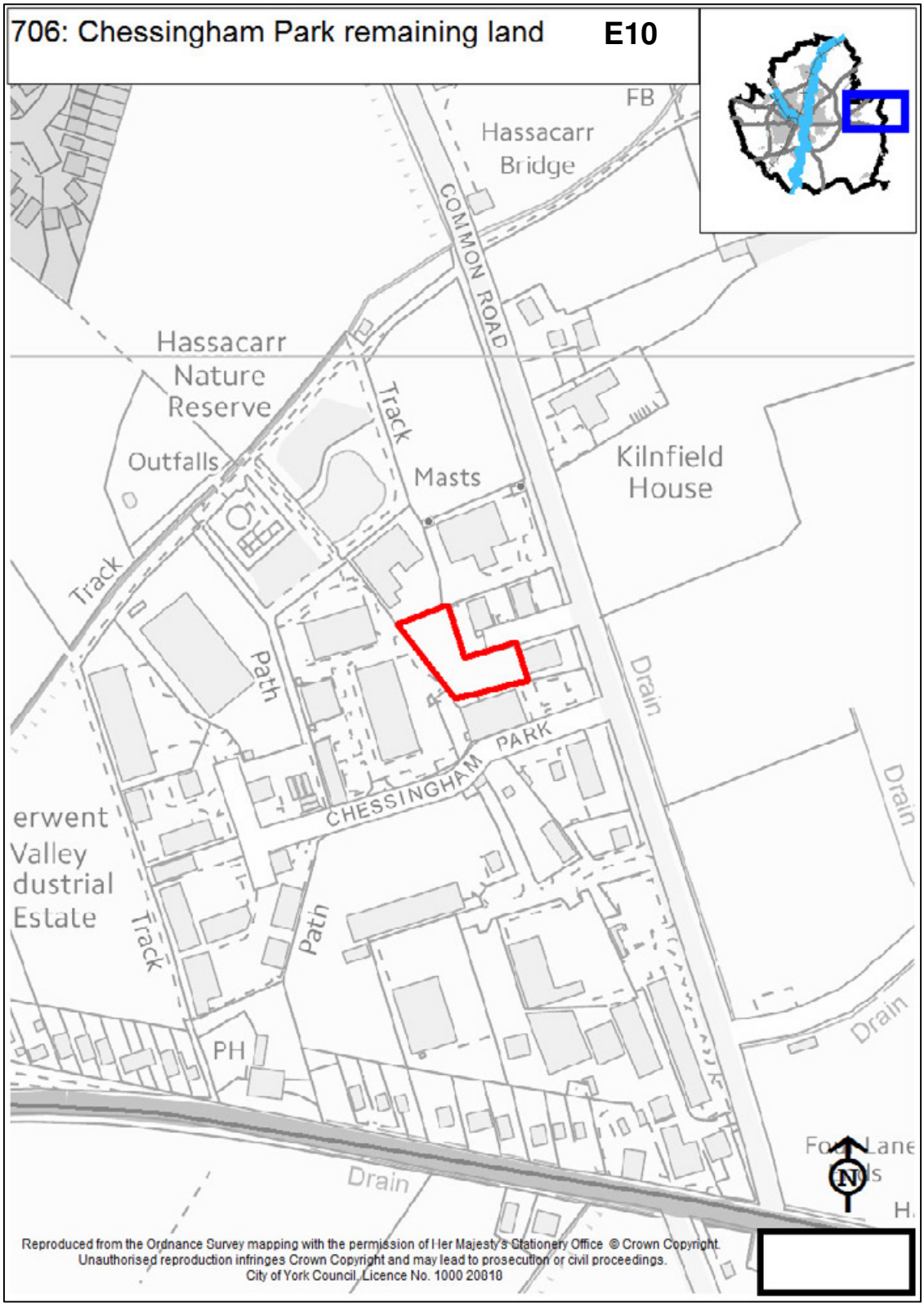
706: Chessingham Park remaining land
E10
FB
Hassacarr Bridge
COMMON ROAD
Hassacarr Nature Reserve
Track
Outfalls
Masts
Kilnfield House
Track
Path
Drain
CHESSINGHAM PARK
erwent Valley dustrial Estate
Track
Path
Drain
Drain
PH
Drain
N
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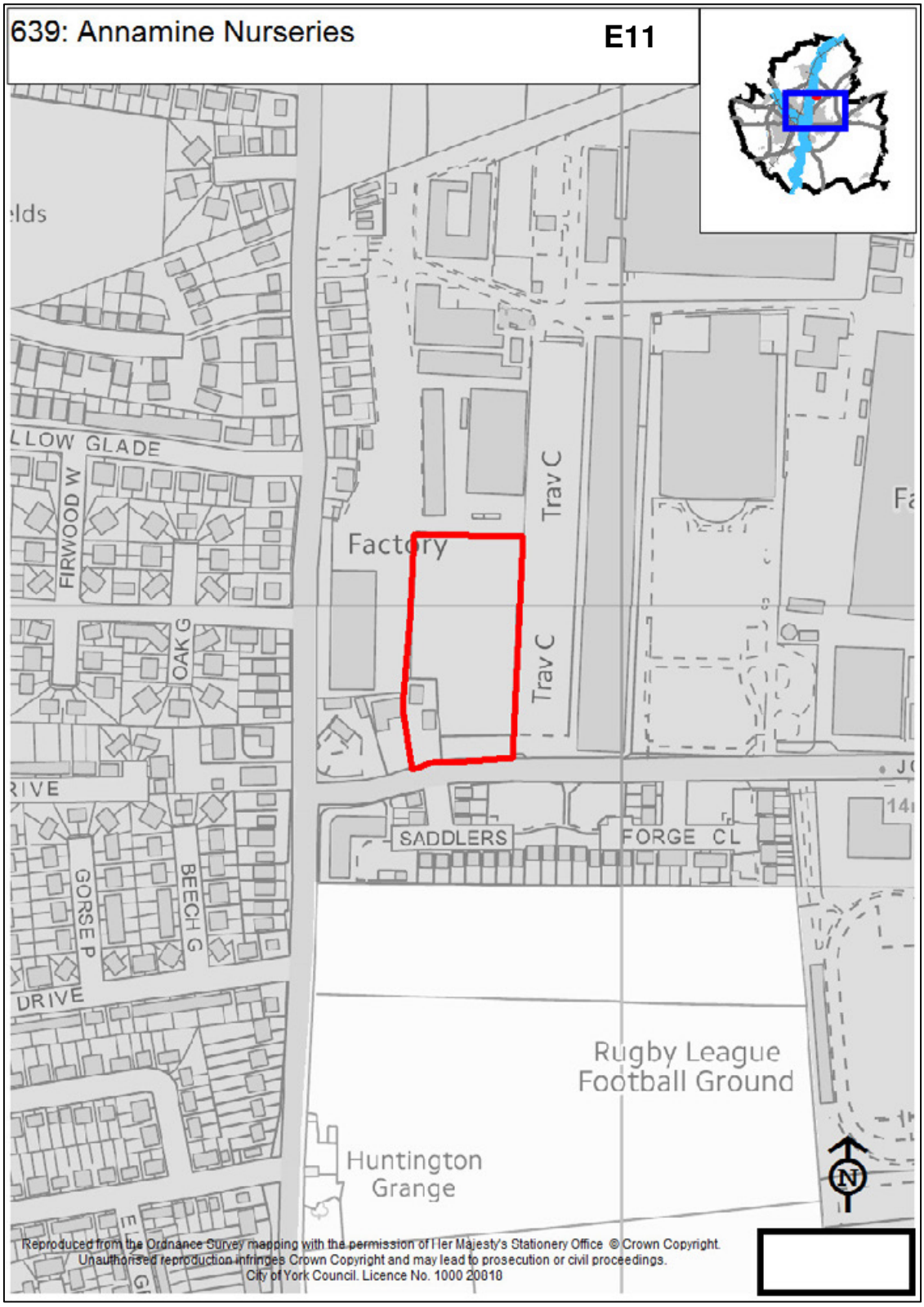
639: Annamine Nurseries
E11
Factory
Trav C
Trav C
SADDLERS
FORGE CL
Rugby League
Football Ground
Huntington
Grange
FIRWOOD W
OAK G
GORSE P
BEECH G
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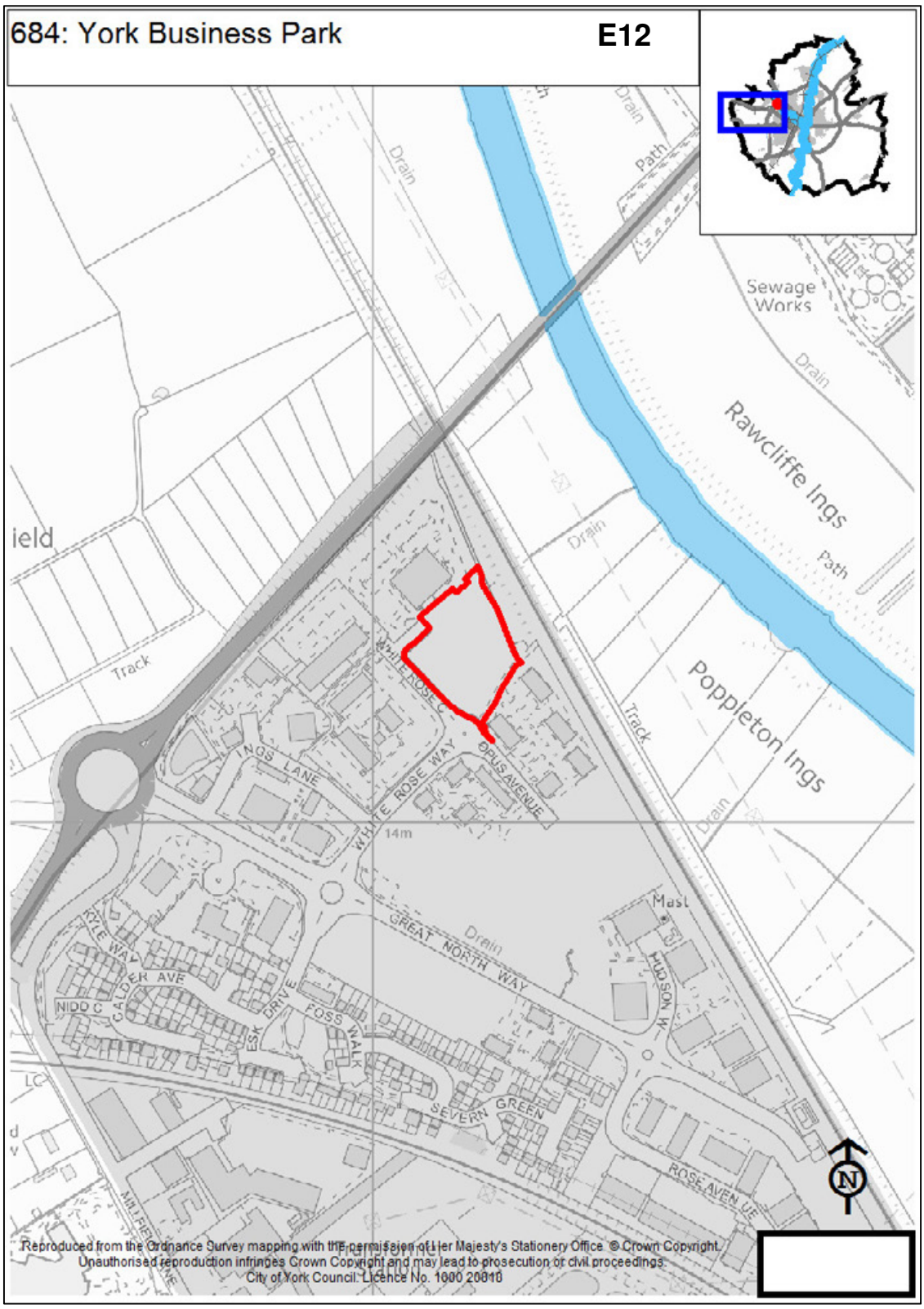
684: York Business Park
E12
Sewage Works
Rawcliffe Ings
Poppleton Ings
Drain
Path
Track
ield
INGS LANE
WHITE ROSE WAY
OPUS AVENUE
14m
GREAT NORTH WAY
Mast
HUDSON W
RYLE WAY
CALDER AVE
NIDD C
ESK DRIVE
FOSS WALK
SEVERN GREEN
ROSE AVEN UE
N
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Table 2 – Officer assessment of technical evidence where addition or deletion of sites or boundary changes could be beneficial

Allocation Reference	Site Name	Officer Commentary
Strategic Sites		
ST5 (Site 906)	York Central	**Total Representations:103** **Supports: 16** **Objections: 38** **Comments: 52** A number of comments support the principle of delivering development on this large brownfield site, including from York and North Yorkshire Chamber of Commerce, Historic England, the York, North Yorkshire and East Riding LEP and Make-it York. Comments raised in support include that the site will enable the creation of a new Central Business District to replace Grade A office losses but that critical infrastructure must be developed alongside (and details made available for consultation); and to the principle of phasing brownfield sites ahead of Greenfield. Some of those writing in support of the scheme query whether the access options proposed are the most appropriate solution, particularly in relation to the loss of Holgate community garden. Although supportive of the principle of development on this brownfield site, Historic England remains unconvinced that the quantum of development proposed is deliverable in a manner that will safeguard the numerous heritage assets in its vicinity, and without harm to the historic core of York. The risk of a development strategy focused on tall buildings and its impact on the historic skyline is also raised by a number of other respondents, including Shepherd Group and Linden Homes.

Allocation Reference	Site Name	Officer Commentary
ST5 Cont... (Site 906)		A number of objections query the site's assumed delivery, stating that there is considerable doubt about the viability and deliverability of the site and its lead-in time. There are concerns that the over-reliance on housing delivery from York Central could undermine the potential for the Plan to provide sufficient land to accommodate projected housing need over the Plan period. The cumulative impact of the site on the city's already congested road network is seen as a significant threat, and the lack of detail regarding sustainable transport options inadequate. There are concerns raised that the prospective route for access to the York Central site crosses the community garden, citing the loss of productive and creative gardening and loss of amenity space. They note further significant impacts including from additional traffic/pollution on local resident's health and quality of life. Several objections question the basic tenets underpinning the scheme – rather that the site should work for the public benefit, by delivering an appropriate housing mix/density and affordable quota. Further general issues raised regarding the lack of information presented to help people understand the scheme, specifically around transport access and sustainable transport options, housing mix and type, supporting services and amenities and how development could create a new place within an existing community. Since the time of the consultation undertaken in July 2016 the Partnership has been progressing further site masterplan and viability work with City of York Council agreeing to the draw down of funds from the West Yorkshire Transport fund for the site access. The outcome of this work to date is suggesting that the site can deliver a minimum of 61,000 sq m of B1a office floorspace (GEA). This is a reduction to the position in PSC which included up to 80,000 sqm B1a office.

Allocation Reference	Site Name	Officer Commentary
ST5 Cont... (Site 906)		**Officers consider that the site should be included as a mixed use site within the plan with an employment allocation of circa 61,000 sqm of B1 a office floorspace within the plan period. This is a slight reduction on the PSC position of 80,000 sqm B1a. This reflects the latest position for the site confirmed by the York Central partnership. Work is continuing to progress the masterplanning of the site and this will be reflected as the Local Plan progresses towards Publication stage and reflected in future iterations of the plan.**
ST6 (Site 181/ 847) ST6 Cont...	Land at Grimston Bar	**Total Representations:17** **Supports: 3** **Objections: 9** **Comments: 6** A small number of responses support the general principle of development on the site for employment uses. Noting the potential impact of development on this open and visually prominent site, and the likely substantial traffic adding to congestion/air pollution, a number of respondents object to the site's allocation including Heslington Parish Council and Fulford Parish Council. Historic England object to the site given the risk of serious harm to the special character and setting of York, which it would not be possible to mitigate They consider it will harm a number of elements identified in heritage topic paper as key to the historic character and setting of York. The topography of the site (slope of terminal moraine) makes any development on site particularly noticeable in views from A64 particularly travelling south. Will reduce gap between A64 and edge of City to 250m and cause considerable harm to views towards eastern edge of city. Would harm relationship between York and Murton. Representation received from developer/landowners. Support the employment allocation but

Allocation Reference	Site Name	Officer Commentary
(Site 181/ 847)		promoting larger mixed use site. Propose an alternative site boundary, returning to previously submitted boundary (Site reference 181). Landowners remain willing to discuss the appropriate extent and mix of development in the context of the need for the Local Plan to provide more housing land, a greater range of small and medium sized housing sites and options for employment development to meet future as yet identified development needs. In the alternative, the site should be excluded from the green belt and identified as safeguarded land to provide flexibility in the longer term. They state that they have removed the northern part of site from the proposal due to prominence to A64. A1079 already heavily influenced by built and other commercial development and provides a good opportunity for a viable mixed use site. **The site has been considered by the technical officer group and this has confirmed that access to the site could be a showstopper. It would be difficult to introduce a new signalised junction given the distance to Grimston Bar roundabout. The site would therefore require a new access off A64 which may make development of this scale unviable. It is not considered that the site could be made larger to potentially increase the viability of the site due to the significant landscape/heritage concerns given prominence of views from A64 and the topography of the site.** **Officers consider that the site should be removed as an employment allocation given the transport showstopper identified.**
ST19 (Site 857)	Northminster Business Park	**Total Representations:31** **Supports: 3** **Objections: 23** **Comments: 6** A small number of responses support the principle of the allocation, including Northminster

Allocation Reference	Site Name	Officer Commentary
ST19 Cont... (Site 857)		Ltd who states that the existing internal infrastructure is capable of being extended to allow immediate further development. The area is suitable for all types of use class/ occupiers Access will be via the existing site entrance. The park is well screened and extensions will be integrated into this environment. Works will take place to help deliver a sustainable and integrated transport system helping to ease the traffic burden. The proposed allocation and safeguarding of additional land on surrounding land to the South, North and West of the Park could provide further capacity to meet employment needs for the future. All surface and foul water run- off is privately managed on site and controlled at agreed rates with the IDB and Yorkshire water. Proposes that the site is allocated for use class B1 (b), B1 (c) B2 and B8. Amongst others, Nether Poppleton Parish Council, Upper Poppleton Parish Council, and Historic England object to the scale of development proposed and its likely impact on the openness of the green belt, historic character and setting of the city and villages of Poppleton and Rufforth. Historic England Advises that, to retain separation between Northminster and nearby villages, the southern extent of the site should extend no further than the existing car park to the south of Redwood House. Amongst many others, the Parish Councils note a number of further concerns, including: • the impact of transport access and egress on residents, stating that it would further impact on their quality of life and increase problems at an already congested junctions; • whether employment expansion in this area is justified given that office space elsewhere remains vacant; • amenity impacts – Northfield Lane is use by walkers, cyclists, horse-riders etc; • loss of agricultural land. One objection states that the site should be instead used for residential development. Rufforth and Knapton Parish Council does not object to the proposed business park

Allocation Reference	Site Name	Officer Commentary
ST19 cont... (Site 857)		expansion, but suggests that conditions are attached to any future consent to control access, hedging, building height, employment type and potential buffer zones. Other comments, including from Rufforth and Knapton Neighbourhood Planning Group, recognise that it does offer significant opportunities for the wider area although raise concerns over the scale/type/density of development proposed, and its impact on traffic, local amenity and green belt character. The PSC included an allocation of 15ha to the south of the existing business park. This allocation is supported by the landowners/developers. The representation from the landowners/developers includes an illustrative masterplan showing a 2.5ha parcel to the south of existing park as the first phase and then further phases across the remaining land. Officers consider that the split of use classes should reflect the existing split of 40/60 B1 to B2/B8. The existing internal infrastructure is capable of being extended for further phases incl. internal roadways, drainage, planting and utilities. As per the planning principles for the site it will be important for the site masterplan to adequately consider landscaping of the site particularly to its southern boundary in order to mitigate impacts and screen the development providing an appropriate relationship with the surrounding landscape. The site will need to include a high quality landscape scheme to ensure an appropriate relationship with the surrounding countryside particularly to the west of the site and to the south including the relationship with Moor Lane (bridleway) and the village of Knapton. Access to the site would be via the existing Northminster Business Park entrance to the A59 and detailed consideration will need to be given through a detailed transport assessment and Travel Plan to promote sustainable transport choices and ensuring good pedestrian and cycle links. Initial transport modelling of residential and employment allocations has shown that excessive queues and delays are being forecast in the Poppleton area, exacerbated by the potential level of development projected for that area, including potential employment sites at

Allocation Reference	Site Name	Officer Commentary
ST19 cont... (Site 857)		Northminster Business Park (ST19), Land to the North of Northminster Business Park and the former Poppleton Garden Centre. The initial modelling undertaken assumes trip rates generated by B1 (office) use only at Northminster Business Park and Land to the North of Northminster Business Park. However, if the existing split at Northminster Business Park is continued at 40/60 B1a to B2/B8 the delays forecast may be an overestimate at this initial stage and would need to be subject to more detailed assessment. **Officers suggest that the 15ha allocation at PSC could be retained to provide approximately 49,500 sqm of floorspace across the B1, B2, B8 uses based on a split of approximately 40/60 B1a to B2/B8 which is the current ratio at the existing business park. Given the potential transport issues raised this would need to be subject to a more detailed assessment.** **The ratio of land (ha) to floorspace (sqm) has been reduced from the PSC position (15ha/60,000 sqm) to reflect further evidence submitted on out of centre employment plot ratios across the city. These are approximately 3,300 sqm of floorspace per ha.**
Site 907	Land to the north of Northminster Business Park	**New site submitted through PSC** Land to the North of Northminster Business Park has been submitted by the landowners for consideration. This could provide 20 ha of employment land to the west of the city for B1a, B2 and B8 uses close to the park and ride. Technical officer assessment confirms site passes criteria 1 to 4 and there are no showstoppers for development. The site could help to increase flexibility over the Local Plan period in an attractive location for employment uses as well as providing a potential alternative to York Central for B1a uses in the earlier part of the plan period. The site is well contained on three sides by Park and Ride, Northfield Lane and existing business park. It would be important for the site masterplan to adequately consider landscaping of the site providing an appropriate relationship with the surrounding landscape and to the A59.

Allocation Reference	Site Name	Officer Commentary
Site 907 cont...		Access to the site would be via Northfield Lane entrance to the A59 and detailed consideration will need to be given through a detailed transport assessment and Travel Plan to promote sustainable transport choices and ensuring good pedestrian and cycle links. Initial transport modelling of residential and employment allocations has shown that excessive queues and delays are being forecast in the Poppleton area, exacerbated by the potential level of development projected for that area, including potential employment sites at Northminster Business Park (ST19), Land to the North of Northminster Business Park and the former Poppleton Garden Centre. The initial modelling undertaken assumes trip rates generated by B1 (office) use only at Northminster Business Park and Land to the North of Northminster Business Park. However, if the existing split at Northminster Business Park is continued at 40/60 B1a to B2/B8 the delays forecast may be an overestimate at this initial stage and would need to be subject to more detailed assessment. **Officers consider that this site could either be considered as an additional allocation or as an alternative allocation to that to the south of Northminster Business Park (ST19) of 20ha to provide approximately 66,000 sqm of floorspace across the B1, B2, B8 uses (based on a ratio of 40/60 B1 to B2/B8. Given the potential transport issues raised this would need to be subject to a more detailed assessment.** **The ratio of land to floorspace reflects further evidence submitted on out of centre employment plot ratios across the city. These are approximately 3,300 sqm of floorspace per ha.**
ST26 (Site 97)	Land at Elvington Airfield Business Park	**Total Representations:19** **Supports: 9** **Objections: 6** **Comments: 5** Amongst others, Elvington Parish Council support the principle of developing the site. Conditions on support include:

Allocation Reference	Site Name	Officer Commentary
ST26 cont... (Site 97)		• That development should be conditional on archaeological/ecological assessment; • restricted B1/B8 use; • weight limits on Main Street. The developer/landowner supports the allocation of the site and confirm that there is already interest in the site. Therefore the site may be developed and occupied before the Local Plan process has been completed. They believe that further land should be allocated to for development to respond to the on going demand for land in this location. The density assumptions used suggest more land will be required to deliver the amount of development envisaged for the site. We believe the whole site is required because this is the only basis on which we understand all identified demand will be met. There is demand for the land within a much shorter time period than the council envisages. The Council should consider allocating the remaining part of the previously safeguarded land for development within the plan period. Objectors to the scheme cite the impact of development on agricultural land/open countryside, increased volumes of heavy goods vehicles and impact on Elvington Lane and Village as significant concerns. Comments reflect concerns above. Yorkshire Wildlife Trust also comments that there is potential for considerable ecological interest on site and adaptation measures must be included through very well designed green space. The PSC included an allocation of 7.6ha as an extension to the existing business park. The representation received on behalf of the landowner/developer supports the allocation but asks for the land to the west to be considered. Demand evidence submitted by the landowner/developer shows demand for new space over plan period and a shortage of B2/B8 provision in south and east of the city. Lower density assumptions than those included in the PSC (2016) would mean a need for the original site plus additional land. The site is attractive to both indigenous companies wanting to expand and new companies

Allocation Reference	Site Name	Officer Commentary
ST26 cont... (Site 97)		relocating. The current business park is fully occupied except 1ha with extant consent for B2/B8. Technical officer assessment supports the larger allocation in principle to meet the identified demand and to provide choice and flexibility in the provision of employment land across the city. The site will require detailed ecological assessment to manage and mitigate potential impacts. The site is adjacent to two site of local interest (SLI) and candidate SINC sites and previous surveys have indicated that there may be ecological interest around the site itself. The site is also within the River Derwent SSSI risk assessment zone and will need to be assessed through the Habitat Regulation Assessment process required to accompany the Plan. The proposal would result in material impacts on the highway network particularly on Elvington Lane and the Elvington Lane/A1079 and A1079/A64 Grimston Bar junctions. A detailed Transport Assessment and Travel Plan would be required. **Officers suggest that consideration could be given to increasing the allocation to 15 ha in total to provide approximately 10ha net of employment land equating to 33,000 sqm of floorspace over the plan period. The ratio of land to floorspace has reduced from the PSC position to reflect further evidence submitted on out of centre employment plot ratios across the city. These are approximately 3,300 sqm of floorspace per ha.**
ST27 (Site 852)	University of York Expansion	**Total Representations: 27** **Supports: 5** **Objections: 12** **Comments: 12** Supports comment that vehicular access from the A64 would be essential to protect

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		sustainable transport priority access into Heslington East northern access points. Managing cumulative impact of traffic generation will need significant investment in sustainable transport solutions (light rail/tram link) to join site to city centre, university campuses and ST15. Generally, where members of the public supported the allocation, it was suggested that certain criteria are met – such as no direct access from Heslington, uses should only be for University use rather than general employment, public rights of way are protected, and the historic views of the City are not compromised, it reflects evidence that well connected locations close to knowledge base are a significant driver for investment in the science / technology sectors. Heslington Village Trust comment that provided the planning principles set out in PSC document are adhered to it should be possible to develop the site without compromising the setting of Heslington and historic views of York. Land is good agricultural land and classified as green belt. The proposal would compromise setting of the village and views. Village will be used as main thoroughfare between new development and Heslington West (Heslington PC). Where members of the public objected, the comments were generally based on loss of Green Belt, loss of open space, adverse effect on historic character and setting / visual impact, over development in this location, access / traffic concerns, parking pressures, and that the University should be providing more on-site student accommodation. Also concerns that Heslington should be protected from becoming a direct route between the two campuses, land at the western campus should be developed before the eastern side and any associated housing should be subject to an Article 4 Direction. Other objections stated that the site highly visible from A64 and would intrude into open land, development would be contrary to green belt purposes, new junction off A64 would have landscape impacts, even with new A64 junction, development would have serious traffic

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		consequences. York Ornithological Trust comments that this is a potential SINC site, but the PSC document does not mention the wildlife value of the southern part of this site. As a result there is no discussion of mitigation measures and without these it is likely there would be a significant negative impact on the wildlife value of the site. Historic England considers that the proposal could harm two elements which contribute to special character of the historic city. Prominent views of site from A64 very close to ring road and expansion would change relationship between York and countryside to south. The proposed landscape buffer could be damaging if it adds 'alien' features to flat landscape. Site could damage relationship between York and its villages, reducing the gap. The University supports the principle of allocation, providing expansion space guaranteeing the University's future contribution to the need for education and research, and to the local, regional and national economies. Comment references the Publication draft Local Plan 2014, which states 'without the campus extension, the University will not be able to continue to grow beyond 2023'. The University appreciates the benefits of exploiting synergies with the proposed new settlement (ST15) to the west of Elvington Lane, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15. The University object to the proposed ST27 boundary in the PSC 2016 consultation. They state that the development potential of the proposed allocation is significantly reduced by the need to incorporate a substantial landscape buffer to A64 and the exclusion of land east of Green Lane, which is outside the control of the University. The remainder of the allocation would be only 21.5ha.s, providing for less than 50% of the University's expansion needs within the plan period to 2032, and could not cater for compliance with Council policy on the provision of student housing and knowledge based business facilities. See supporting 'Assessment of Visual effects' for further appraisal. Note that to not provide for the University's future development needs would impact on the City's ability to confirm a

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		permanent green belt for the first time. The site was reduced in PSC from 25ha at Publication Draft to 21.5ha to remove field to west to help to protect the setting of Heslington Representation received on behalf of University of York states that the needs analysis undertaken concludes 32.5ha gross site area is required to meet needs of University to 2032**.** In addition 3 boundary alternatives were included in the submission. Option1 is the preferred option which is the previous Publication Draft boundary. This would give a net development area of 22.5ha with a substantial landscaping buffer to the south. The western boundary of the site would also require suitable boundary treatment which would be provided within the allocation. This allocation would meet the identified need to 2032. This would also deliver the planning principles for the site, which would ensure no vehicle access to Heslington, a low density development to reflect campus 3, access to the southern side of lake (potentially shared with new junction of A64 for the ST15 site), 3 x 650 bed colleges, economic activity linked to University and an academic research facility. Alternative options showing development further south could work given the infrastructure required for the potential new A64 junction for ST15 which would introduce built development. Campus 3 has already changed to a degree the nature of the landscape and has 'urban influences' particularly at night when lit. There is the opportunity for an innovative masterplan that works with the landscape setting and creates a new part of city. Historic England continues to object to the allocation. They recognise the importance of the university to the city but consider that expansion needs to be delivered in a manner which best safeguards the elements which contribute to the setting of the city. The University of York is a key component of the long term success of the city and it is important to provide a long term opportunity for the University to expand. It offers a unique opportunity to attract businesses to the city that draw on the Universities applied research and there is lots of evidence across the country showing the benefits of co-locating such

Allocation Reference	Site Name	Officer Commentary
ST27 cont.. (Site 852)		businesses with a University. The University proposal is a priority in the Local Economic Plan (LEP) and within the Council's Economic Strategy which recognises the need to drive the University and research led growth in high value sectors. The site will also facilitate the re-configuration of the existing Campus 3 site to provide additional on-campus student accommodation helping to reduce the impacts on the private rented sector. **Officers suggest that consideration is given to increasing the allocation to 26 ha in total to provide approximately 26,000 sqm of employment floorspace based on an approximate 10% employment use along with the provision of 3 x 650 bed student colleges and an academic research facility to meet the needs of the University over the plan period.**
Site 864	Land to the north of Elvington Industrial Estate	**New site submitted through PSC** New site submitted through PSC for consideration as an additional employment site to the north of the existing Elvington Industrial Estate. Site is 5.4ha and is currently in agricultural use (Grade 3). The site can be accessed from the north of the existing industrial estate. The existing industrial estate benefits from a very high level of occupancy which demonstrates that this location is sound commercially and evidence from local estate agents suggests there is an unmet demand for additional employment floorspace in this area. The site passes the site selection methodology and technical officers consider that there are no showstoppers to the potential development of this site. The site could provide additional employment land to help to increase flexibility over the Local Plan period in an attractive location for employment uses. The site boundaries are clearly defined by mature hedgerows and the site is well screened. **Officers suggest that consideration is given to this potential new allocation of 5.4ha to provide approximately 17,820 sqm of floorspace for B2, B8 uses. The ratio of land to floorspace reflects further evidence submitted on out of centre employment plot ratios**

Allocation Reference	Site Name	Officer Commentary
		across the city. These are approximately 3,300 sqm of floorspace per ha.
Site 246	Whitehall Grange, Autohorn, Wigginton Road	**Site not included in PSC (2016)** Planning permission (16/01446/OUTM) has been granted for the demolition of existing buildings and the use of the land as a car storage facility for up to 2000 cars. A 2-storey, 3000sqm office building for approximately 200 staff would be located at the northwest corner of the site. **Officers suggest that the Whitehall Grange site is allocated as a strategic employment site within the Local Plan to reflect the planning consent granted.**
Non Strategic Sites		
E5 (Site 201)	Land at Layerthorpe/ James Street	**Total Representations: 2** **Supports: 1** **Objections: 1** **Comments: 1** Support for the principle of infill development. Representation received from planning agent on behalf of company who have a long leasehold interest in part of site. Consider this is an inappropriate allocation, not required for employment use and unlikely to be made available to accommodate the proposed re-development. Site is only 0.2ha and has a planning application pending (15/01571/FULM) on part of site for student accommodation. This application was deferred at planning committee pending further information on flood risk. Confirms that there are a number of long lease holders who do not want to be constrained by employment allocation. Gradual loss of employment to other uses in the area including leisure, student accommodation and residential. Removing part of site covered by pending planning app will take site under threshold.

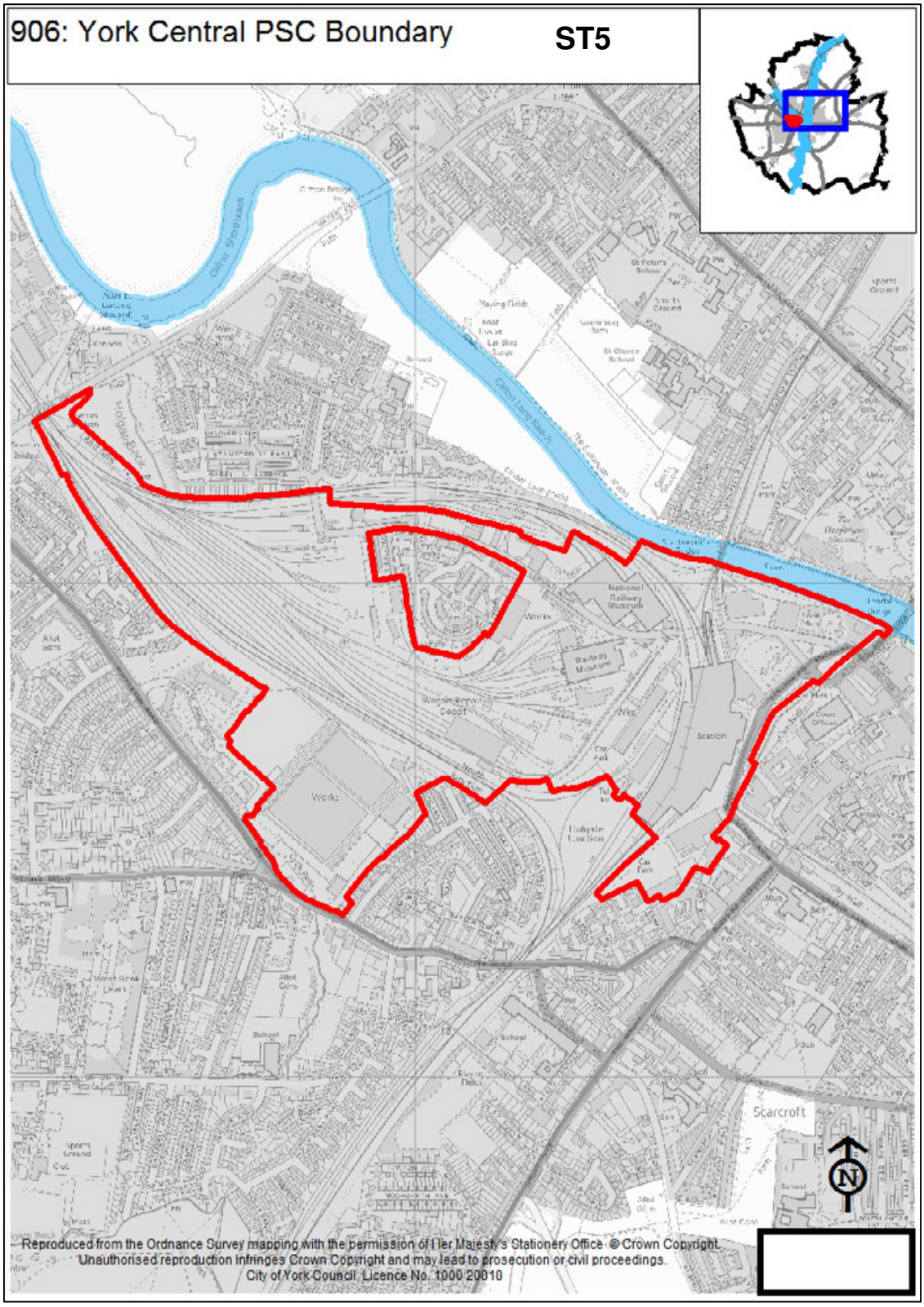
Allocation Reference	Site Name	Officer Commentary
		Officers suggest that the site is removed as an employment allocation given the lack of a willing land owner and application pending for student housing.
Site 742	Bull Commercial Centre, Stockton on the Forest	**Site not included in PSC (2016)** Representation received for reconsideration as an extension to the existing employment site to allow for indigenous companies to expand. The site is a former meat/livestock centre that was given consent as a light industrial employment site in 1987 and contains approximately 3,000 sqm of light industrial small scale workshops/units. The extension would provide a further 3ha providing up to 10,000 sqm of floorspace. The site has existing access onto Stockton Lane. The site currently provides a number of relatively low cost starter and nursery units for small businesses housed in self contained small units. The proposed extension to the existing site is well screened by existing trees and hedgerows and would provide a logical extension to the existing site to allow for the expansion/reconfiguration of existing premises and/or the provision of additional starter units for new occupiers. **Officers suggest that consideration is given to this site as a potential new allocation of 3ha to provide approximately 10,000 sqm of floorspace for light industrial units. The ratio of land to floorspace reflects further evidence submitted on out of centre employment plot ratios across the city. These are approximately 3,300 sqm of floorspace per ha.**
Site H57 (Previous E16) Site 885	Poppleton Garden Centre Minster Equine Veterinary Clinic,	**Total Representations: 38** **Supports: 2** **Objections: 26** **Comments: 11** The supports consider that the proposed allocation of the site for residential purposes in the

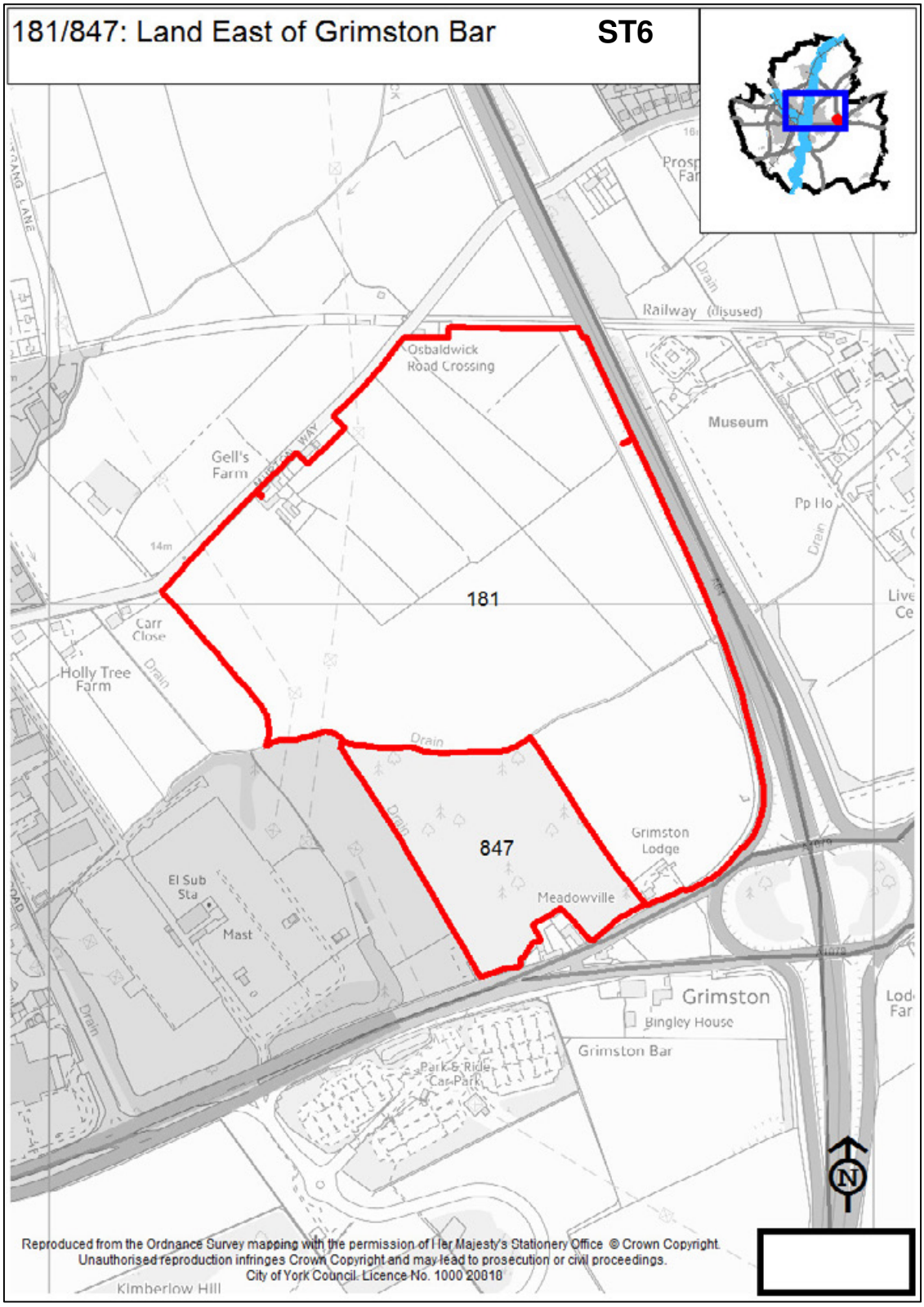
Allocation Reference	Site Name	Officer Commentary
Site 890	Northfield Lane Luigis Restaurant, Northfield Lane	PSC (2016) Will make a positive contribution towards meeting the Council's identified housing need. Housing on this site is consistent with one of core planning principles of NPPF that local authorities should encourage re-use of brownfield sites provided not of high environmental value. Pressure would be removed from green field development. Accessibility is excellent due to proximity of P&R and is well located in relation to Poppleton village, whilst recognised that connectivity to existing community can be improved as a result of development of site. Both Nether and Upper Poppleton Parish Council's comments that there is a need for houses but also for sustainable employment, which is currently provided by the existing garden centre. Concern is raised about the impact of urban sprawl on this rural area. At present there is severe flood risk on the road created by paving and large non-porous surfaced areas. Carr Dyke runs at capacity, increasing the risk of flooding to York. Increased housing in this area will only add to the risk of flooding. Sustainable transport using the P+R scheme is unrealistic as it is time-limited and not routed through the village where services are located. Other objections to the site as a residential allocation comment that the existing garden centre is well used, that the site lies outside the village settlement line, concern of urban sprawl, use of park and site unrealistic, Must be looked at alongside ST19 in terms of impact on access to A59. Sustainable transport using the P+R scheme is unrealistic as it is time-limited and not routed through the village where services are located. There will be a lack of school places at local primary and secondary schools along with pressure at medical facilities. Houses at this site break the separation between houses on A59 and those at other side of ring road. The current garden centre is in keeping with the green belt area and separates the current developments. Other brownfield sites should be developed first. Historic England object to the sites inclusion as a residential allocation stating that It is likely

Allocation Reference	Site Name	Officer Commentary
Site 890 cont...		that this allocation would cause harm to a number of elements identified as contributors to the historic character and setting of York - reducing the gap between Northminster Business Park and the perceived southern boundary of Poppleton. Mitigation measures should include reducing the scale of the site to remove land to the south of the existing buildings. Historic England have no objection to redevelopment of the part of the site currently occupied by existing buildings. The site has been reconsidered by technical officers and it is considered that the Poppleton Garden Centre site along with two smaller newly submitted sites adjacent to the existing garden centre (Minster Equine (0.35ha) and Luigis restaurant (0.21 ha)) could be combined to provide an employment allocation of approximately 3.4ha. This could provide approximately 11,000 sqm of floorspace across the range of employment use classes. It is considered that employment uses would be more suitable than residential given the surrounding uses along Northfield Lane, which are largely commercial except for a small terrace of existing residential properties. The site provides good accessibility to the city given its proximity to Poppleton Bar Park and Ride and is located within a reasonable distance to Poppleton village although it is recognised that connectivity would need to be improved through the development of the site. Initial transport modelling of residential and employment allocations has shown that excessive queues and delays are being forecast in the Poppleton area, exacerbated by the potential level of development projected for that area, including potential employment sites at Northminster Business Park (ST19), Land to the North of Northminster Business Park and the former Poppleton Garden Centre. The initial modelling undertaken assumes trip rates generated by B1 (office) use only at Northminster Business Park and Land to the North of Northminster Business Park. However, if the existing split at Northminster Business Park is continued at 40/60 B1a to B2/B8 the delays forecast may be an overestimate at this initial stage and would need to be subject to more detailed assessment.

Allocation Reference	Site Name	Officer Commentary
Site 890 cont...		**Officers suggest that consideration is given to the re-allocation of Poppleton Garden Centre along with the newly submitted Minster Equine Centre and Luigis restaurant for 3.4ha to provide approximately 11,000 sqm of floorspace for employment uses. The ratio of land to floorspace reflects further evidence submitted on out of centre employment plot ratios across the city. These are approximately 3,300 sqm of floorspace per ha. Given the potential cumulative transport issues raised in the initial transport modelling this would need to be subject to a more detailed assessment.**
Site 795	Greenacres, Murton	**Site not included in PSC (2016)** Site resubmitted for consideration as B2/B8 employment site. Site previously passed criteria 1 to 4 of SSP but failed technical officer assessment on landscape grounds: *"The current site provides openness that can be observed from the A166 although the site is viewed against a backdrop of sheds, warehouses etc associated with Friars Close and the Livestock Centre.* ***A Landscape and visual appraisal should be conducted to investigate these aspects****"* A landscape assessment has been submitted through the PSC alongside a transport assessment. It is considered that the site may be appropriate for some employment development. The site would represent a logical extension to the adjacent commercial land uses subject to an appropriate scale/density of development and adequate landscape treatment. **Officers suggest that consideration is given to the inclusion of a new allocation of 1.95ha to provide approximately 6,000 sqm of floorspace for light industrial units. The ratio of land to floorspace reflects further evidence submitted on out of centre employment plot ratios across the city. These are approximately 3,300 sqm of floorspace per ha.**

Annex 4: Officers Assessment of Employment Sites following PSC




181/847: Land East of Grimston Bar
ST6
Railway (disused)
Osbaldwick Road Crossing
Museum
Gell's Farm
181
847
Carr Close
Holly Tree Farm
Drain
El Sub Sta
Mast
Meadowville
Grimston Lodge
Grimston
Bingley House
Grimston Bar
Park & Ride Car Park
Kimberlow Hill
N
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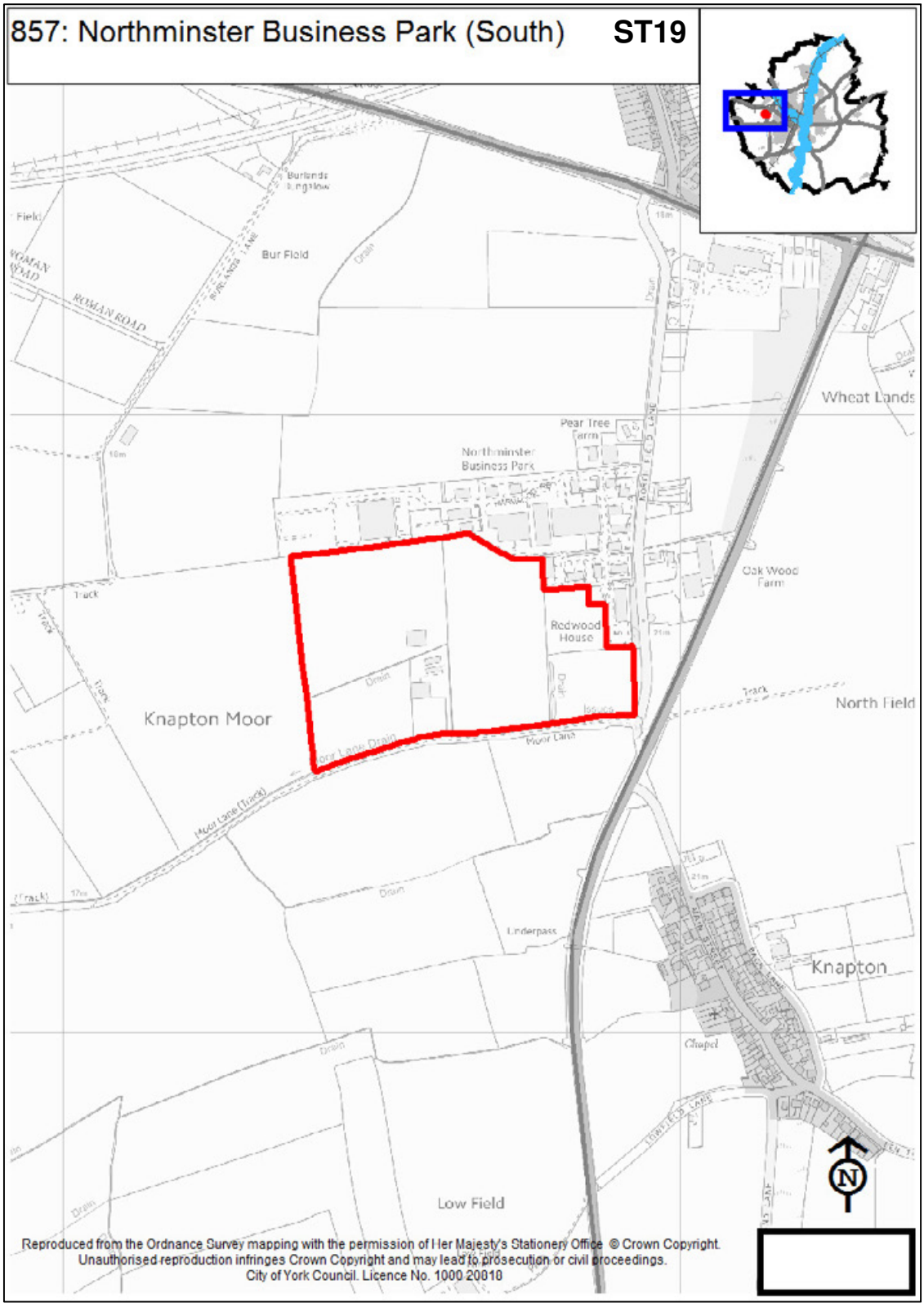
857: Northminster Business Park (South)
ST19
Bur Field
ROMAN ROAD
Wheat Lands
Pear Tree Farm
Northminster Business Park
Oak Wood Farm
Redwood House
Knapton Moor
North Field
Moor Lane
Moor Lane (Track)
Underpass
Knapton
Chapel
Low Field
N
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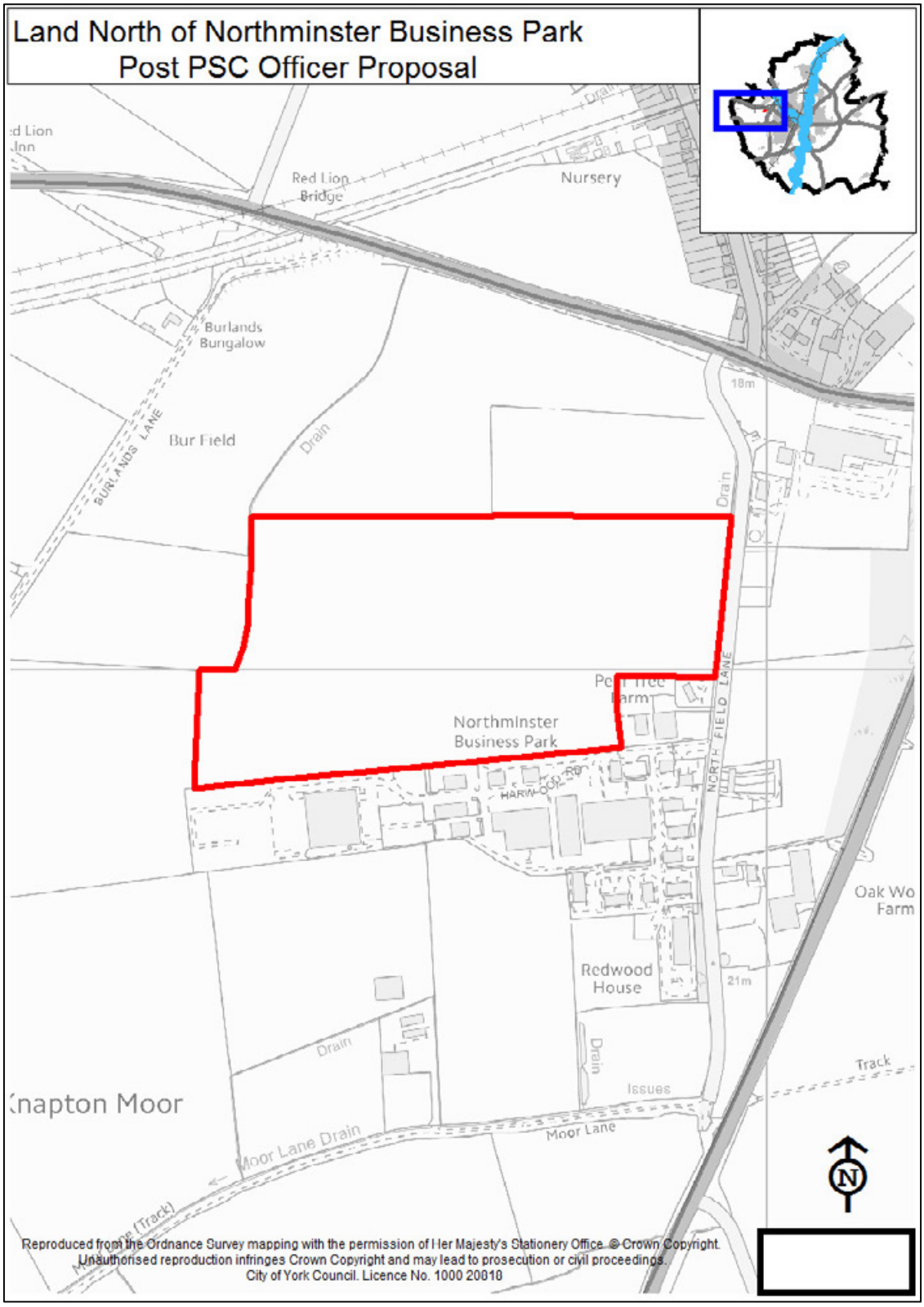
Land North of Northminster Business Park
Post PSC Officer Proposal
Red Lion Bridge
Nursery
Burlands Bungalow
Bur Field
Drain
NORTH FIELD LANE
Northminster Business Park
Redwood House
Oak Wo Farm
Track
Issues
Moor Lane
Moor Lane Drain
18m
21m
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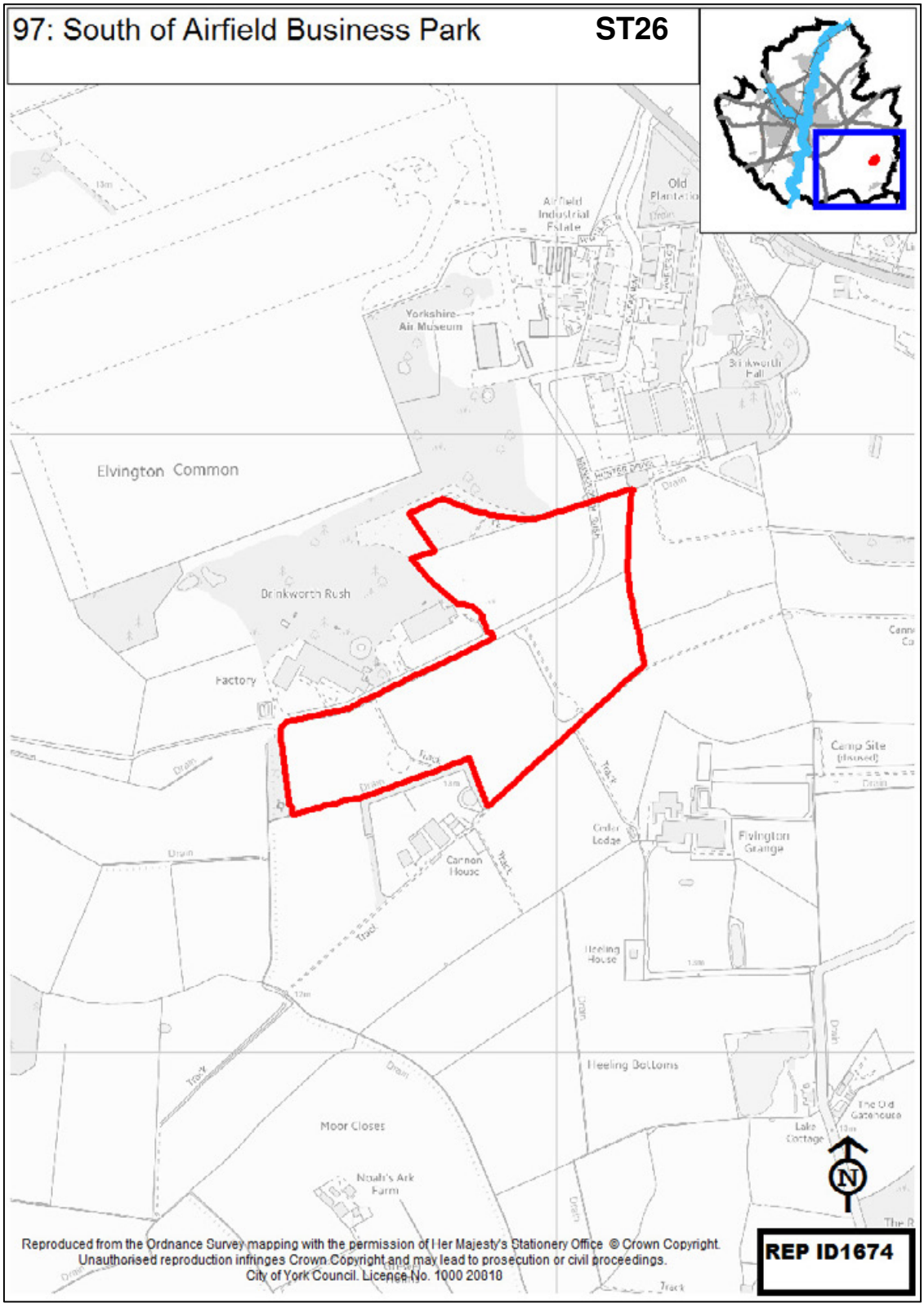
97: South of Airfield Business Park
ST26
Elvington Common
Drinkworth Rush
Factory
Yorkshire Air Museum
Airfield Industrial Estate
Old Plantation
Drinkworth Hall
Carmon House
Cedar Lodge
Elvington Grange
Camp Site (disused)
Heeling House
Heeling Bottoms
Moor Closes
Noah's Ark Farm
Lake Cottage
The Old Gatehouse
Track
Drain
N
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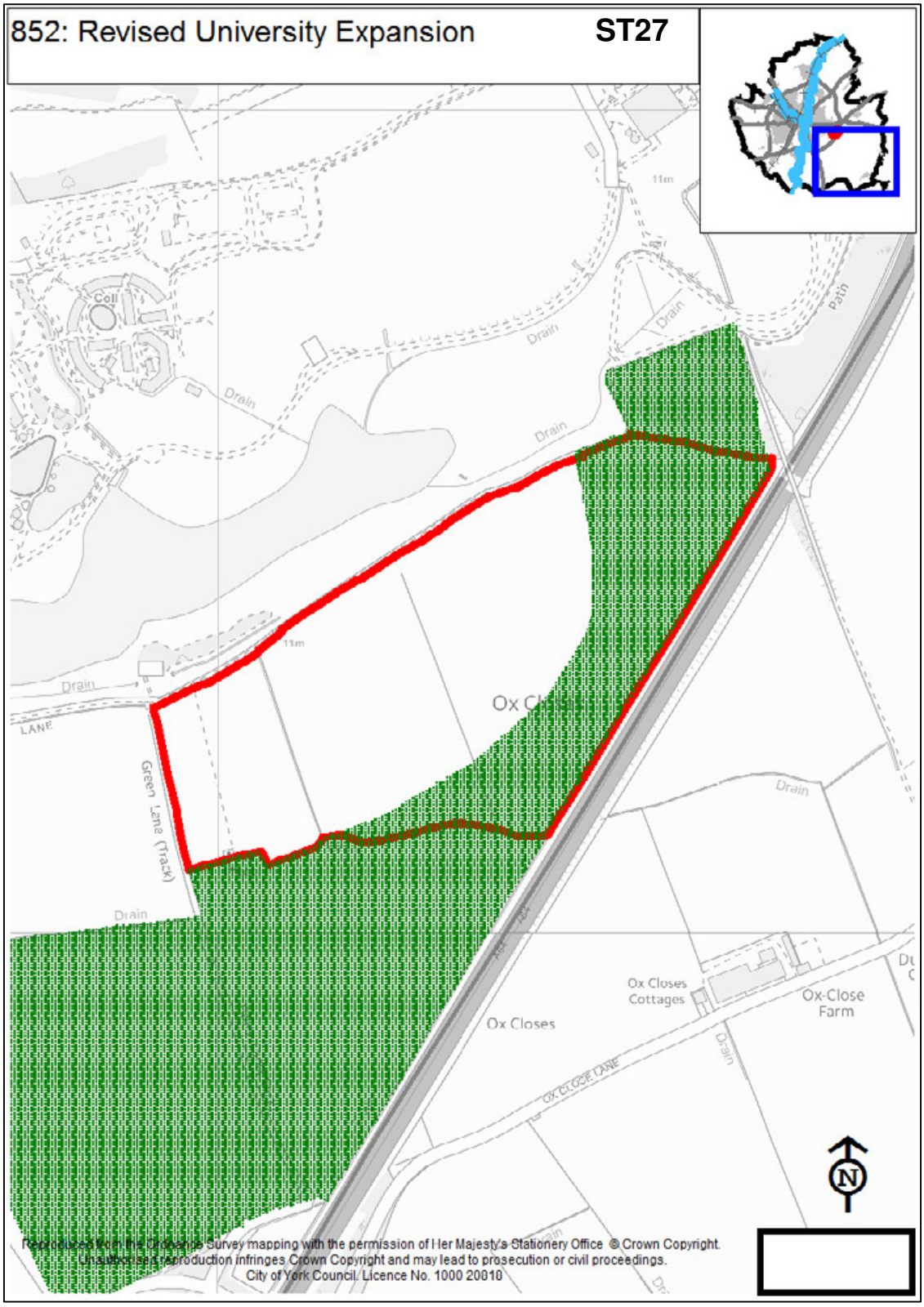
REP ID1674


852: Revised University Expansion
ST27
Drain
Green Lane (Track)
Ox Closes
Ox Closes Cottages
Ox-Close Farm
OX CLOSE LANE
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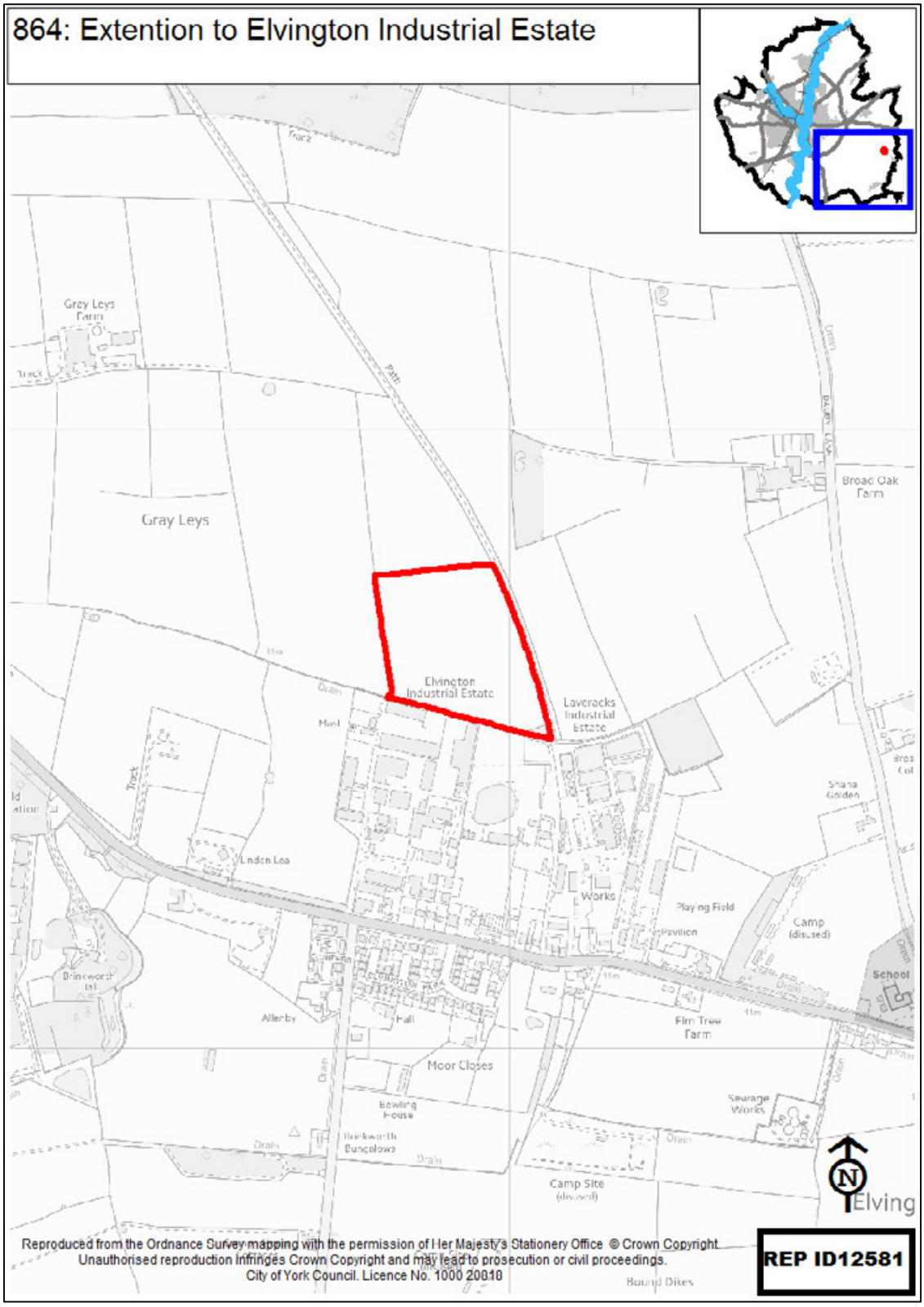
864: Extention to Elvington Industrial Estate
Gray Leys Farm
Gray Leys
Broad Oak Farm
Elvington Industrial Estate
Laverocks Industrial Estate
Linden Lea
Works
Playing Field
Pavilion
Camp (disused)
School
Allerby
Hall
Elm Tree Farm
Moor Closes
Bowling House
Sewage Works
Camp Site (disused)
Bound Dikes
Elving
REP ID12581
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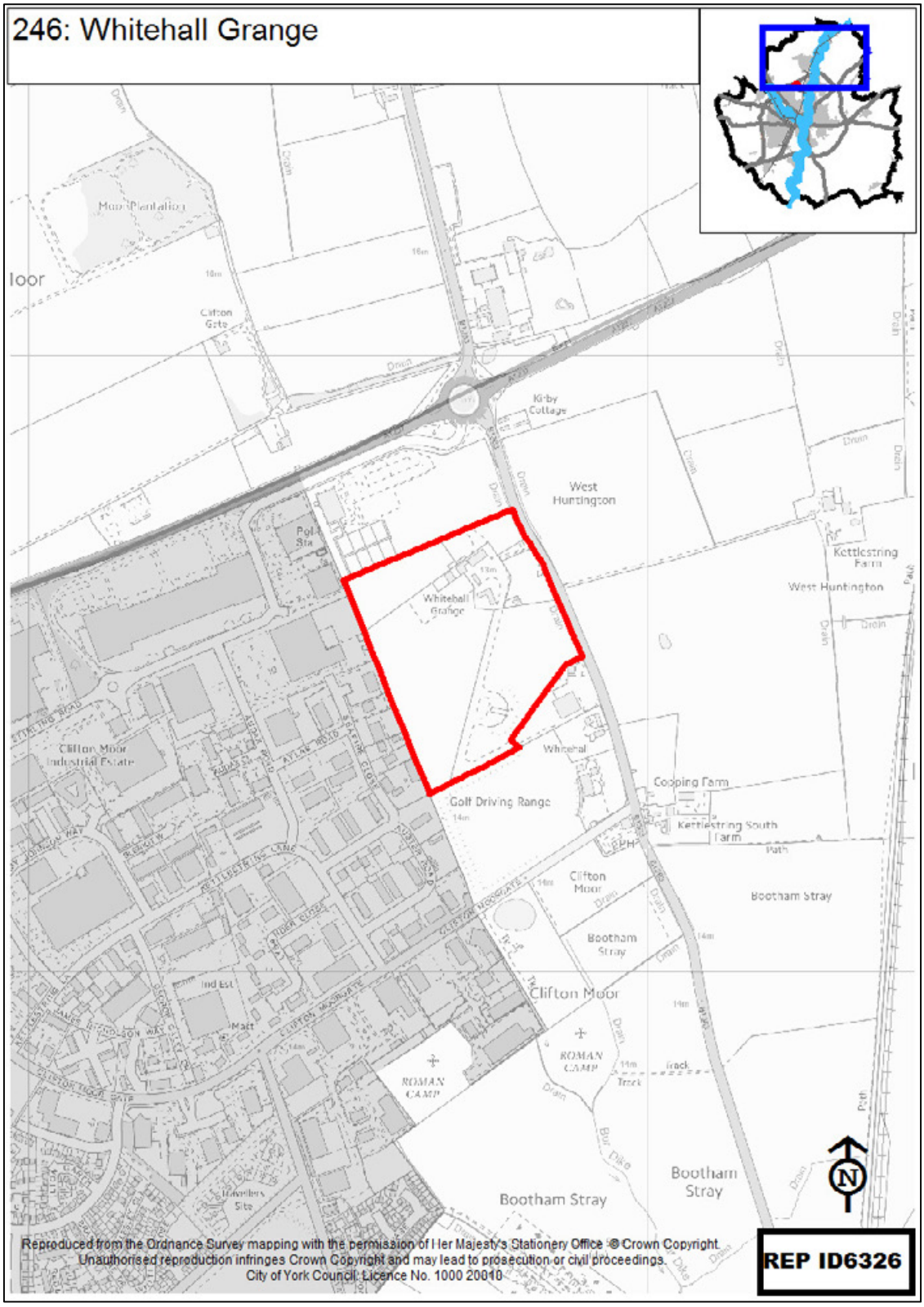
246: Whitehall Grange
Kirby Cottage
West Huntington
Kettlestring Farm
West Huntington
Whitehall Grange
Clifton Moor Industrial Estate
Golf Driving Range
Whitehall
Copping Farm
Kettlestring South Farm
Clifton Moor
Bootham Stray
Bootham Stray
Clifton Moor
ROMAN CAMP
ROMAN CAMP
Bootham Stray
Bootham Stray
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REP ID6326

201: Horwell Brothers Ltd
Depot
Pipe Line
EBORACUM WAY
Gas Holder
A1036
AGAR ST
FOSS BANK
LAYERTHORPE
REDEANESS STREET
HAWTHORN ST
GLEN AVENUE
FABER ST
RICHMOND ST
LITTLE HA
HALLIFIELD RO
Layerthorpe
JEWBURY
Layerthorpe Bridge PW
PEASHOLME GREEN
MANSFIELD
Foss Islands
9m
DUNDAS ST
PALMER L
HUNGATE
Foss Navigation
FOSS ISLANDS ROAD
Red Twr
Mast
N
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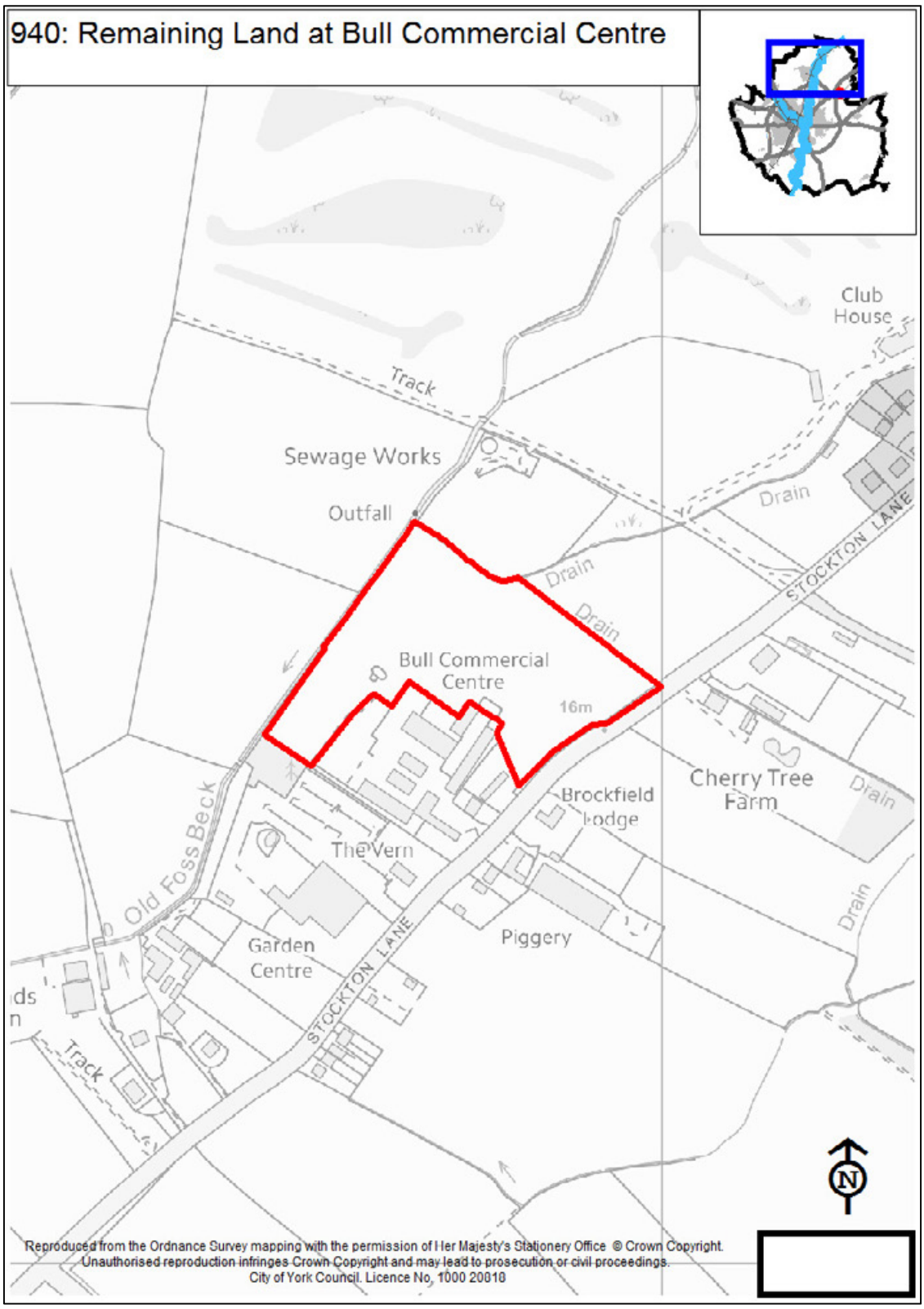
940: Remaining Land at Bull Commercial Centre
Club House
Track
Sewage Works
Outfall
Drain
Drain
Drain
STOCKTON LANE
Bull Commercial Centre
16m
Cherry Tree Farm
Drain
Brockfield Lodge
The Vern
Old Foss Beck
Garden Centre
Piggery
STOCKTON LANE
Drain
Track
N
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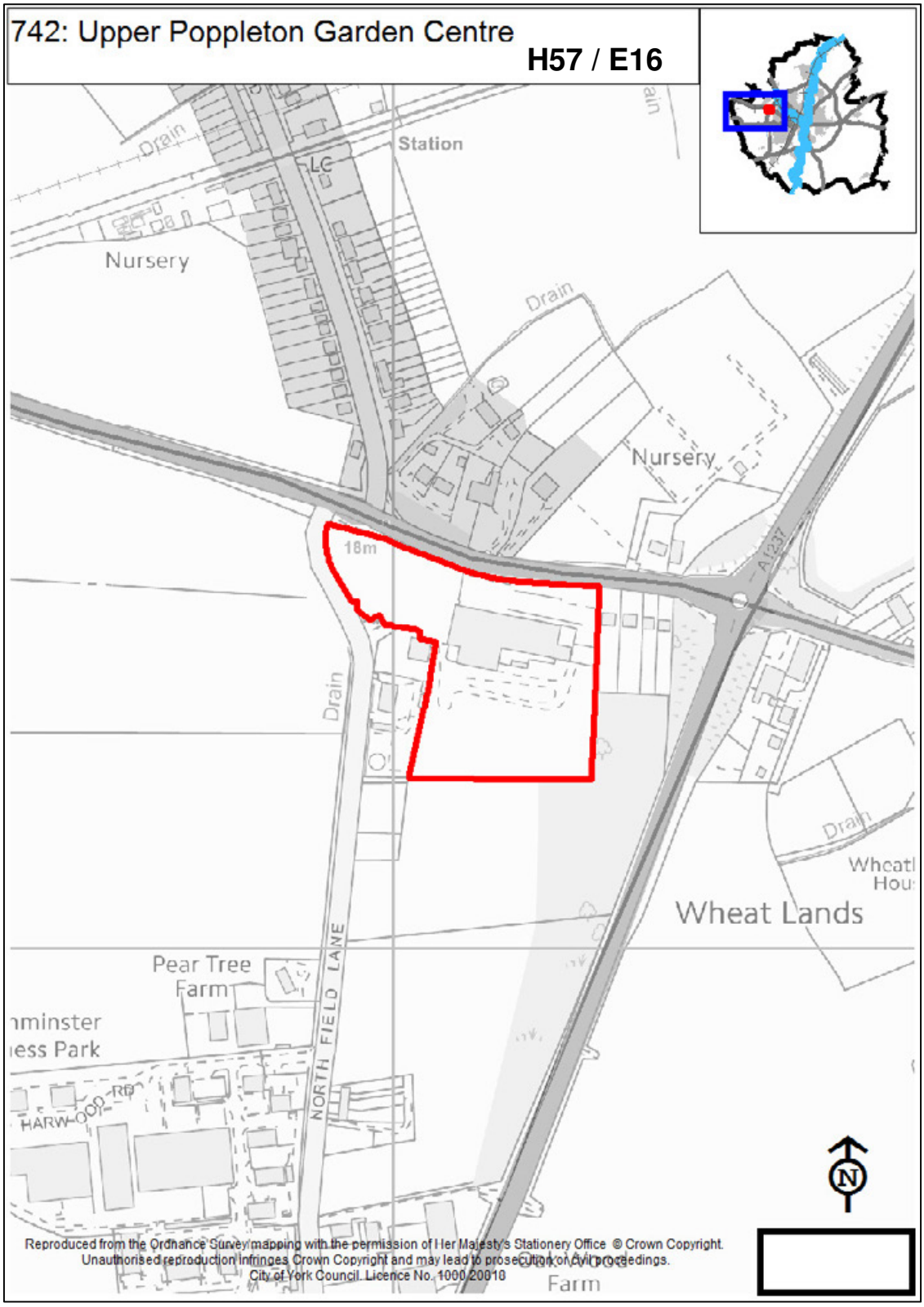
742: Upper Poppleton Garden Centre
H57 / E16
Station
LC
Drain
Nursery
Drain
Nursery
18m
A1237
Drain
Drain
Wheat Lands
Pear Tree Farm
NORTH FIELD LANE
HARWOOD RD
Farm
N
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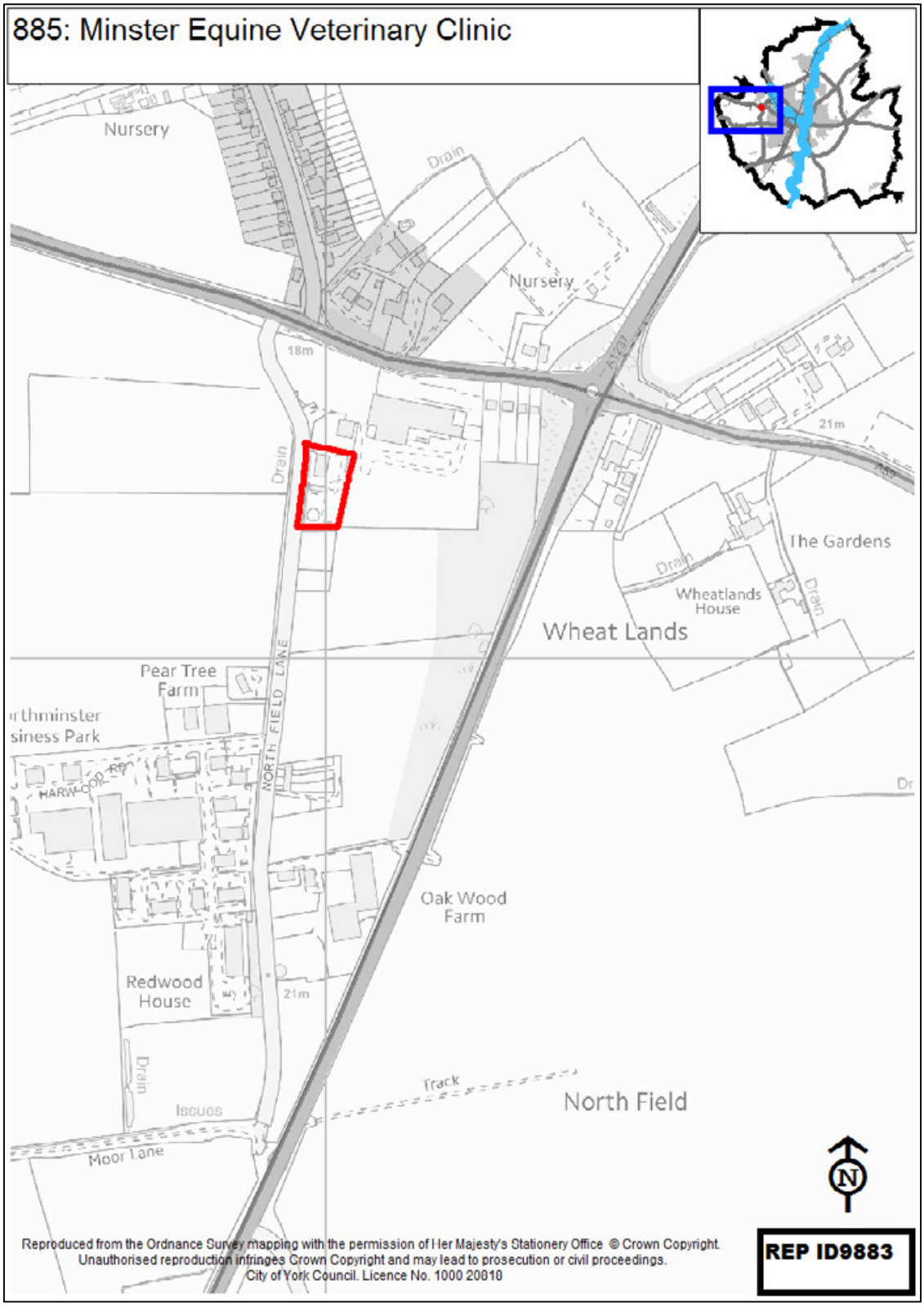
885: Minster Equine Veterinary Clinic
Nursery
Drain
Nursery
18m
A1237
21m
A59
Drain
The Gardens
Drain
Wheatlands House
Drain
Wheat Lands
Pear Tree Farm
NORTH FIELD LANE
Oak Wood Farm
Redwood House
21m
Drain
Track
North Field
Issues
Moor Lane
N
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REP ID9883

890: Luigis
Station
Nursery
Drain
Nursery
18m
A1237
Wheat Lands
Pear Tree Farm
Northminster Business Park
HARWOOD RD
NORTH FIELD LANE
Oak Wood Farm
Redwood House
21m
N
REP ID13092
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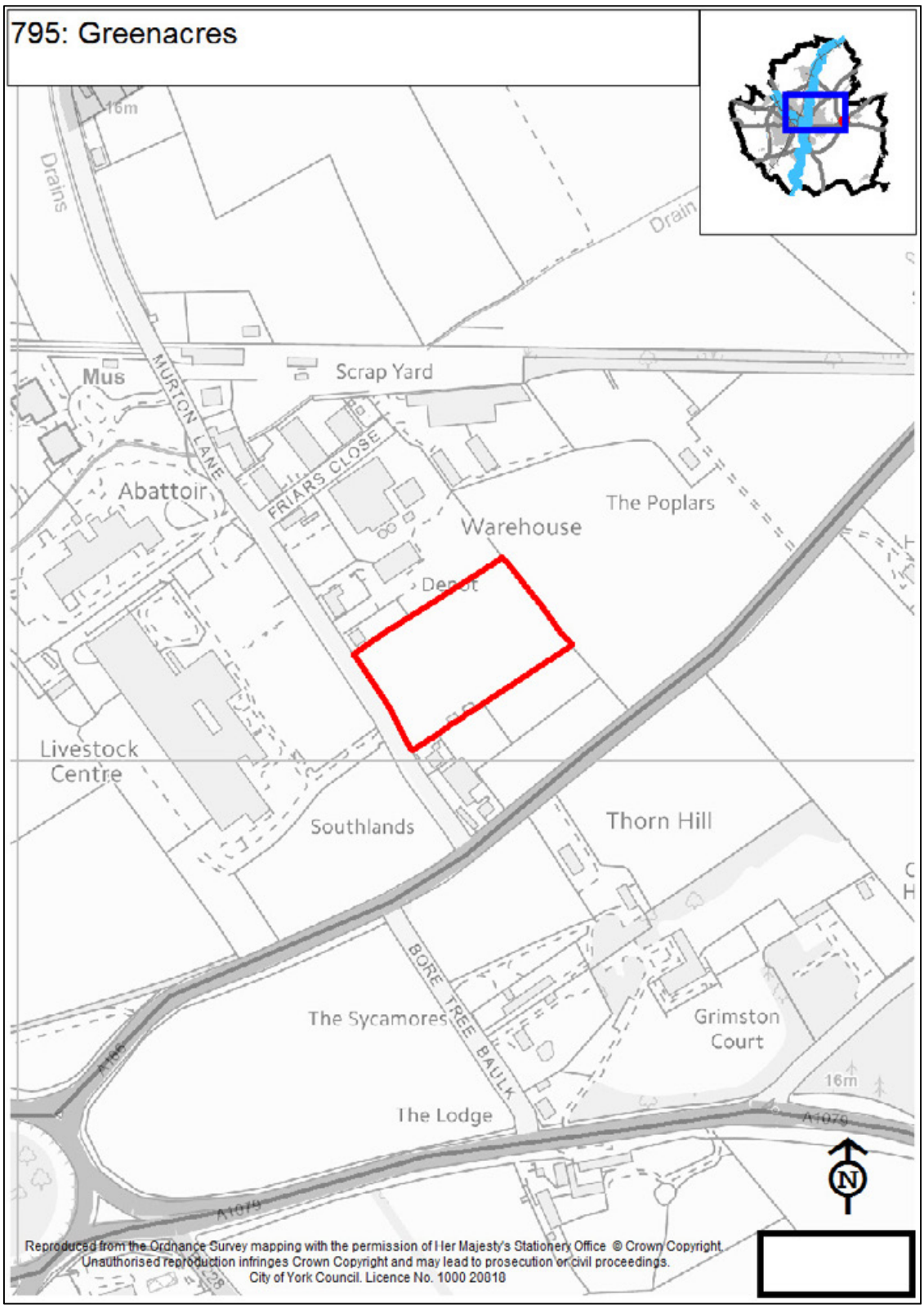
795: Greenacres
16m
Drains
Drain
Mus
MURTON LANE
Scrap Yard
FRIARS CLOSE
Abattoir
The Poplars
Warehouse
Depot
Livestock Centre
Southlands
Thorn Hill
BORE TREE BAULK
The Sycamores
Grimston Court
16m
A166
The Lodge
A1079
A1079
N
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Table 3 – Officer assessment of technical evidence where addition of sites or boundary changes not accepted

Allocation Reference	Site Name	New Site/ Previously Considered Site
Strategic Sites		
ST21	Designer Outlet	**Total Representations: 2** **Supports: 1** **Objections: 1** **Comments: 0** Comment notes that the removal of the site will help protect Fulford Community Orchard, a much valued local facility. York Designer Outlet supports the removal of the Designer outlet from the green belt, but strongly object to the removal of the strategic leisure allocation. Deletion of the allocation fails to recognise the importance of the YDO which provides 1,500 full and part time jobs and is one of the largest employers in the area. The deletion fails to acknowledge that without an allocation on the Site or an acknowledgement of its importance in the Local Plan, the future of the YDO as a driver of sustainable economic growth in York remains uncertain. Rep states that the site should be reinstated as a Strategic Economic development site rather than a Strategic Leisure Location. Site was previously identified as a 12,000 sqm leisure development subject to a detailed retail impact assessment to assess any potential adverse impacts on York city centre and other sequentially preferable sites. Whilst the role of the site in York's economy is recognised the site is in an out of centre location and therefore any future proposals should be assessed through the planning application process against relevant policies in the NPPF and the emerging Local Plan rather than through a specific allocation. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 51.**

Allocation Reference	Site Name	New Site/ Previously Considered Site
ST25	Land south of Designer Outlet	**Total Representations: 2** **Supports: 1** **Objections: 0** **Comments: 1** Comment notes that the removal of the site will help protect Fulford Community Orchard, a much valued local facility. Mc Arthur Glen's aspiration for the land south of the YDO is to support the additional development on the site by providing an opportunity for additional car parking/enhanced park and ride facilities. They do not object to the removal of the Strategic Site for Employment, but request that the Local Plan recognises the important role that this Green Belt site has in providing an opportunity for Park and ride facilities, an appropriate use in the Green Belt. The site was previously identified as a strategic employment allocation however further assessment of the site confirmed that the existing boundary treatment to the south of the existing site which consists of a belt of mature trees provides a strong defined green belt boundary and helps to screen the existing site from the surrounding open countryside. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 52.**
Site 873	Land East of Designer Outlet	Boundary change to previously considered site (site reference 798). Representation from planning agent on behalf of landowner/developer. 18ha land to east of Designer outlet proposed for B1a/B1b employment allocation. Site is easily accessible with adjacent P&R and existing road infrastructure to Designer Outlet which could accommodate additional traffic. Would balance employment supply both in terms of deliverability issues with YC and lack of alternative/additional B1a locations and also is located to the south of City which lacks employment provision. Close to A64/A19 and attractive location for inward

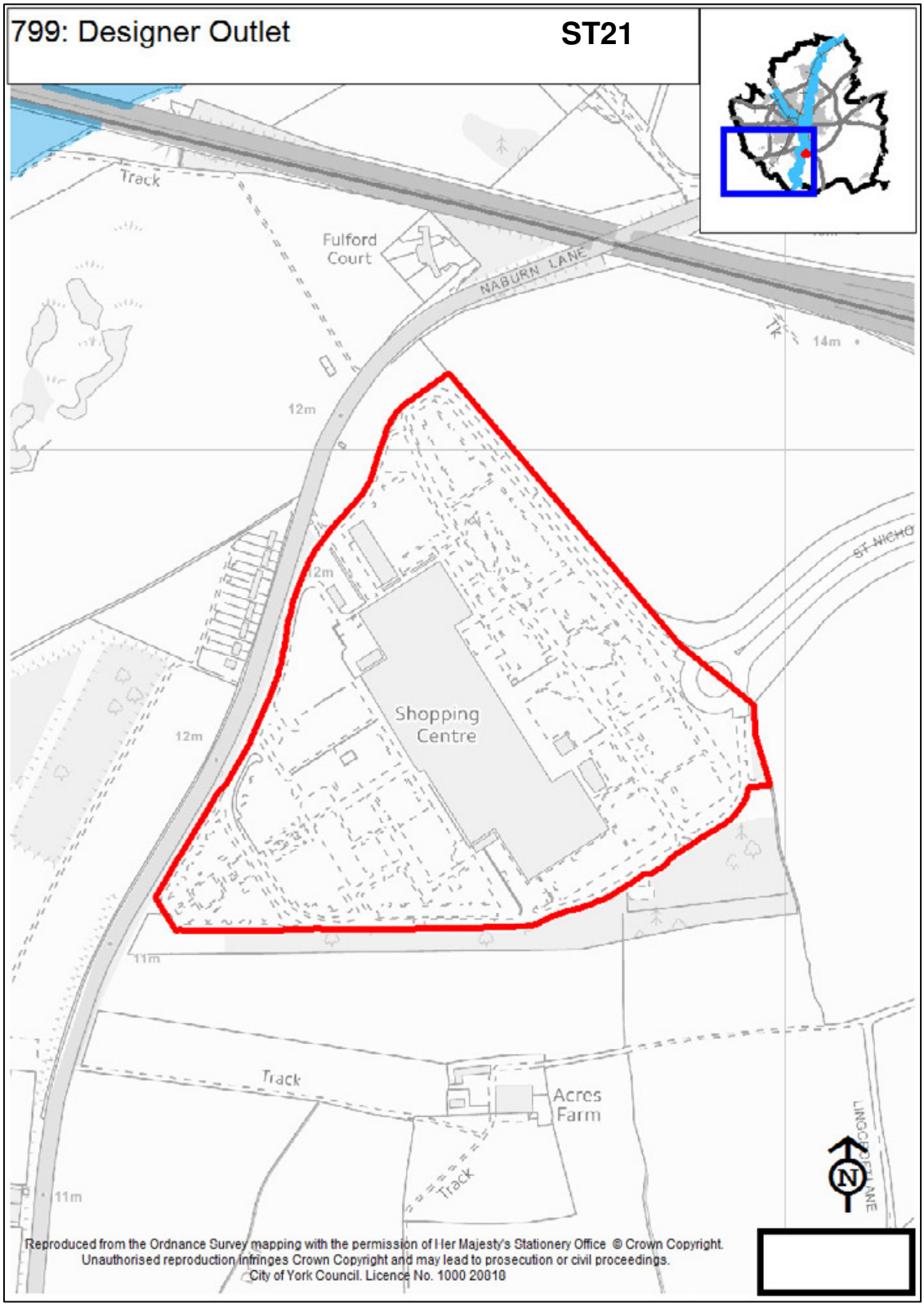
Allocation Reference	Site Name	New Site/ Previously Considered Site
Site 873 cont...		investors. Clear and defensible boundaries. Would create 'campus style' business park with extensive landscaping and restrict height to that of the existing Designer Outlet to reduce impacts on the surrounding landscape. Additional evidence submitted including Employment Needs Report (Regeneris), Heritage Settings Assessment, Interim Landscape & Visual Briefing and Sustainability Appraisal. The site falls entirely within a green wedge designated as part of the historic character and setting Appraisal (2003, 2011, 2013) and therefore fails criteria 1 of the site selection methodology (environmental assets). The further landscaping evidence has been reviewed and it is still considered that the scheme would have a negative impact on the setting of the city as it would bring development right up to the A19 on a key approach to the city. It is acknowledged that the proposed landscaping scheme and the reduced height/density of this revised proposal could help to mitigate some impacts however there would still remain a solid development within what is currently a fluid landscape creating a visual impact on what are currently open fields viewed from the A19. The surrounding open countryside currently presents a rural approach to the city and to Fulford village. There are also significant transport constraints on the A19 which would be exacerbated through the further expansion of the Designer Outlet and the introduction of B1a (office) use and the associated trips. Whilst it is recognised that the adjacent Park and Ride would offer a sustainable alternative to car use there would still be a significant amount of peak hour trips created through the development of this site as proposed. **Officers consider that the site should not be included as an allocation in the emerging**

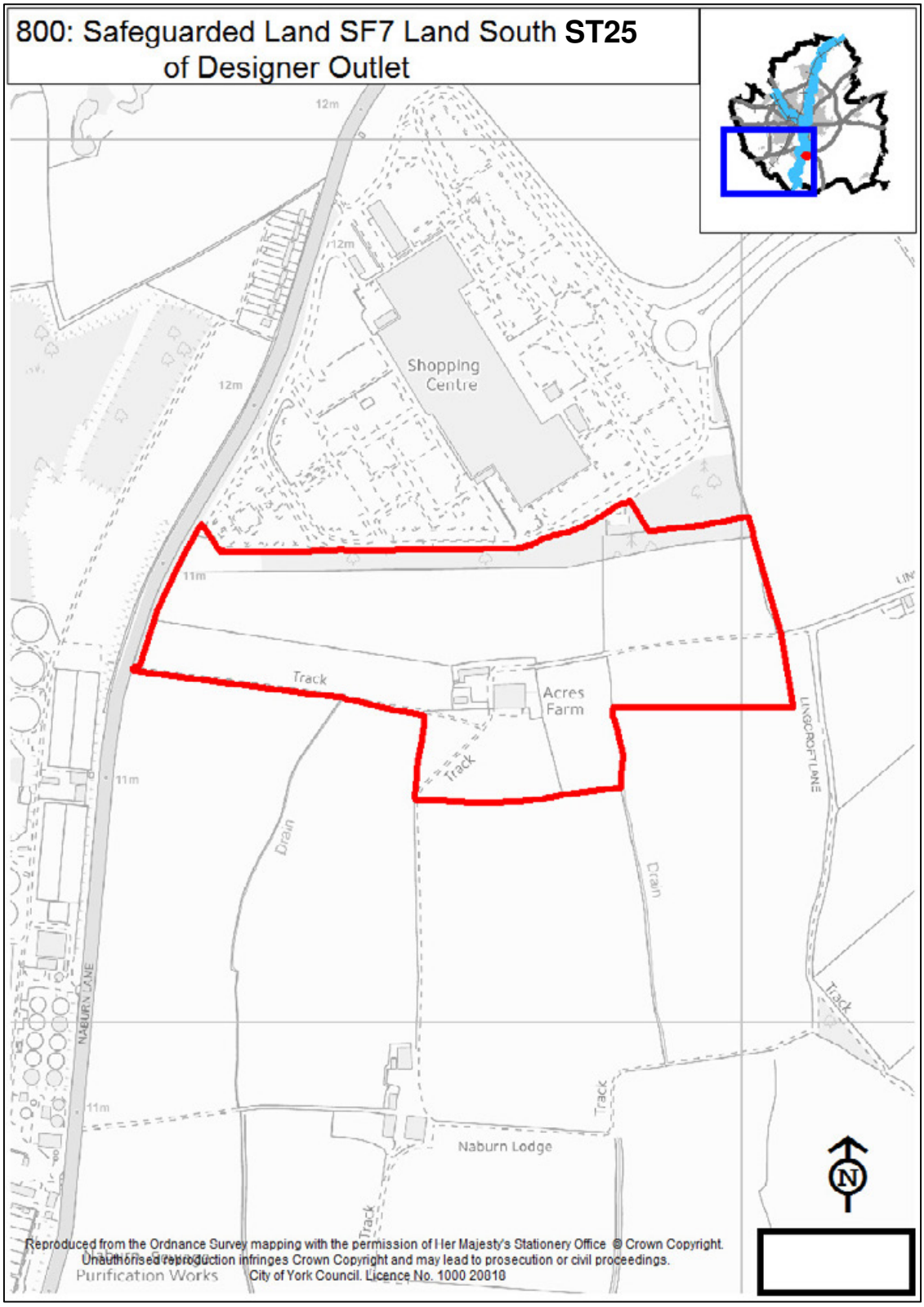
Allocation Reference	Site Name	New Site/ Previously Considered Site
		Local Plan. See map on page 53.
Site 892	Land at Grange Farm, Strensall Road, Towthorpe	**New Site submitted through PSC (2016)** Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as an employment site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 54.**
Site 894	Land at Cross Moor Lane and Usher Lane, Haxby	**New Site submitted through PSC (2016)** Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as an employment site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 55.**
Non Strategic Sites		
Site 112	Brook Nook, Osbaldwick	Previously rejected site. Site fails criteria 1 of the site selection paper methodology (environmental assets) as it within an area of importance for the historic character and setting of the City - Area preventing coalescence (G2). Part of the site also falls within flood zone 3a/3b. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 56.**
Site 160	Land at Grimston Bar	Previously rejected site. Representation from planning agent on behalf of landowner asking for the land to be re-considered as an employment allocation. No new technical evidence submitted. The site previously failed technical office comments on both transport and landscape grounds. In relation to transport the site would need a new direct access either off the A166

Allocation Reference	Site Name	New Site/ Previously Considered Site
Site 160 cont...		or the A1079 and is also not well connected by either pedestrian, cycle or public transport routes. In terms of landscape the site is isolated and is tight against three main arterial roads into the city. The site would have a negative impact on the setting of the city. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 57.**
Site 161	Land at Murton Lane Industrial Estate	Previously rejected site. Representation from planning agent on behalf of landowner asking for the land to be re-considered as an employment allocation. No new technical evidence submitted. The site previously failed technical office comments on both transport and landscape grounds. In relation to transport the site is considered unsustainable and is not well connected by either pedestrian, cycle or public transport routes. In terms of landscape the site is tight against the A166 (Stamford Bridge Road) and would create a significant extension to the urban area. The site would have a negative impact on the setting of the city. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 58.**
Site 865	Four Alls Public House, A64	**New Site submitted through PSC (2016)** Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as an employment site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 59.**
Site 895	Meadow Farm Crossmoor Lane,	**New Site submitted through PSC (2016)**

Allocation Reference	Site Name	New Site/ Previously Considered Site
Site 895 cont...	Haxby	Site fails criteria 4 (access to facilities and transport) of the Site Selection Paper methodology and is therefore not considered suitable as an employment site. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 60.**
Site 898	Land at the Old Slip Inn, Malton Road	Previously rejected site. Site fails criteria 1 of the site selection paper methodology (environmental assets) as it within a green wedge (C2). No further technical evidence submitted. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 61.**
Site 899	York Road Dunnington Reduced Boundary	Alternative boundary of previously considered site (Site reference 74) Site is not considered suitable for employment development. The site is outside of the existing settlement limits of the village and its development would impact on the character and setting of Dunnington Village particularly on the approach to the village via York Road. **Officers consider that the site should not be included as an allocation in the emerging Local Plan. See map on page 62.**

Annex 4: Officers Assessment of Employment Sites following PSC




800: Safeguarded Land SF7 Land South of Designer Outlet **ST25**
12m
12m
12m
Shopping Centre
11m
Track
Acres Farm
Track
11m
Drain
Drain
LINGCROFT LANE
NABURN LANE
11m
Track
Track
Naburn Lodge
Purification Works
N
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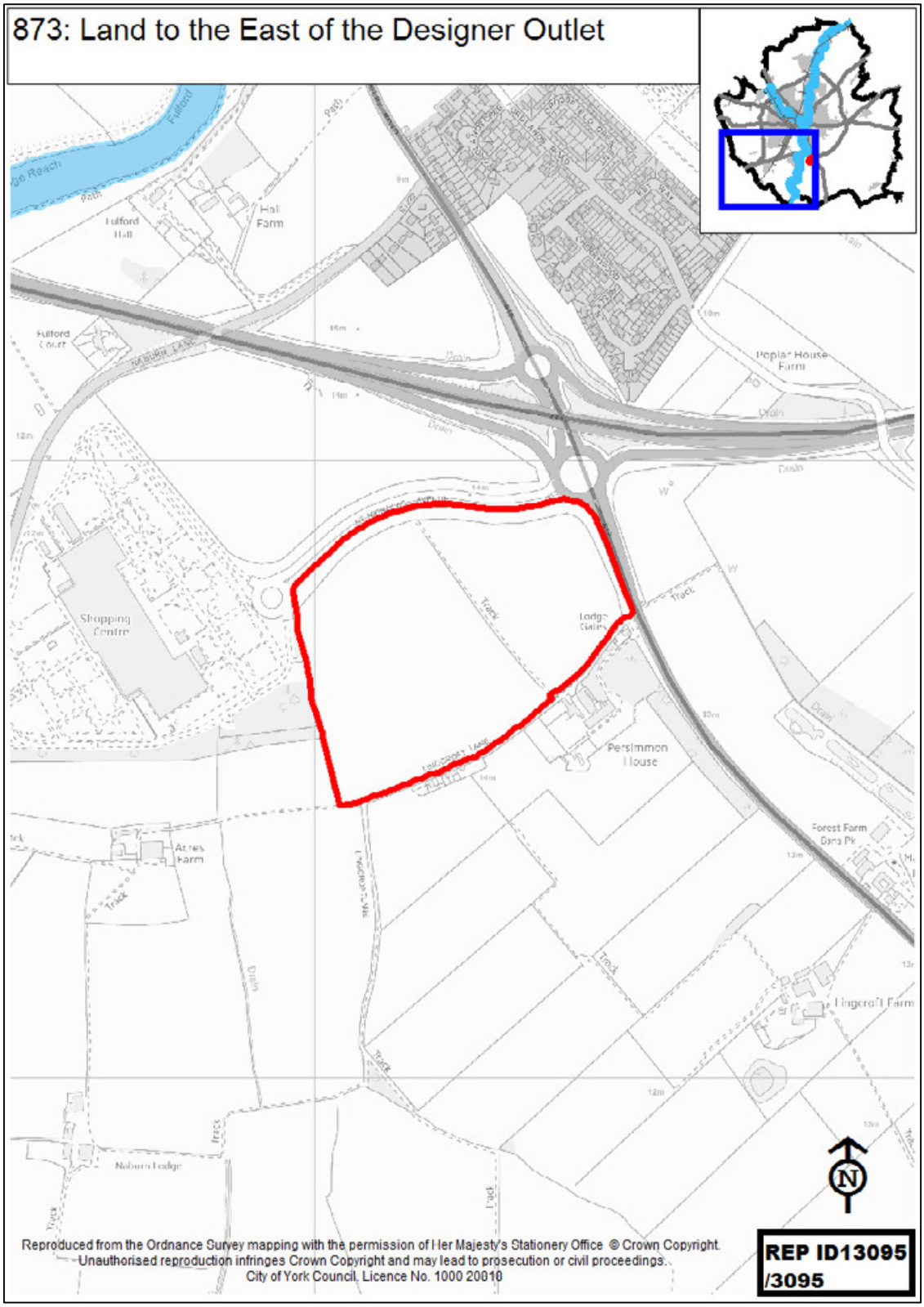
873: Land to the East of the Designer Outlet
Hall Farm
Fulford Hall
Fulford Court
Poplar House Farm
Shopping Centre
Persimmon House
Forest Farm
Acres Farm
Nabum Lodge
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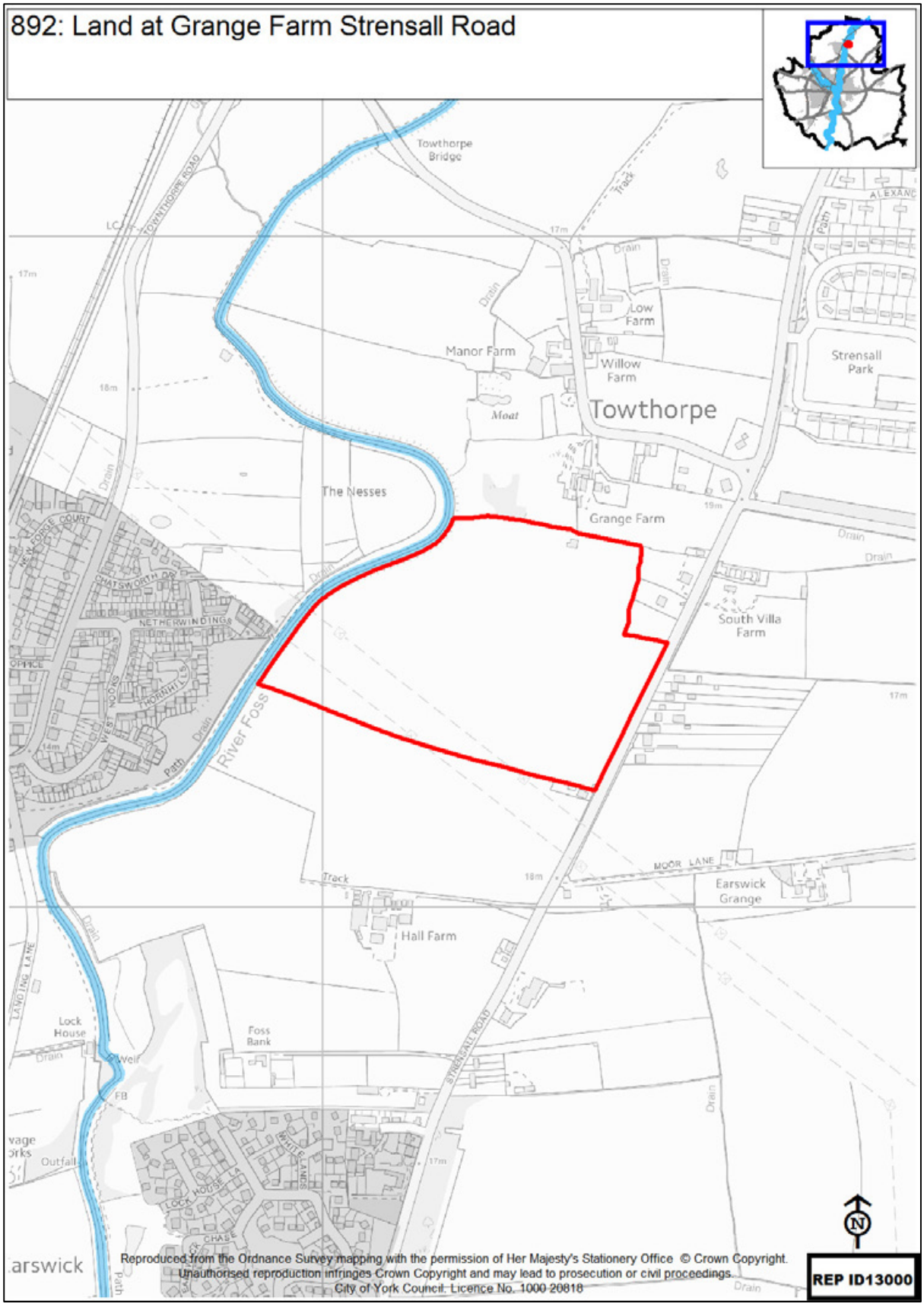
REP ID13095 /3095


892: Land at Grange Farm Strensall Road
Towthorpe Bridge
Towthorpe
Manor Farm
Low Farm
Willow Farm
Moat
Strensall Park
The Nesses
Grange Farm
South Villa Farm
River Foss
Hall Farm
Earswick Grange
MOOR LANE
Lock House
Foss Bank
Weir
Outfall
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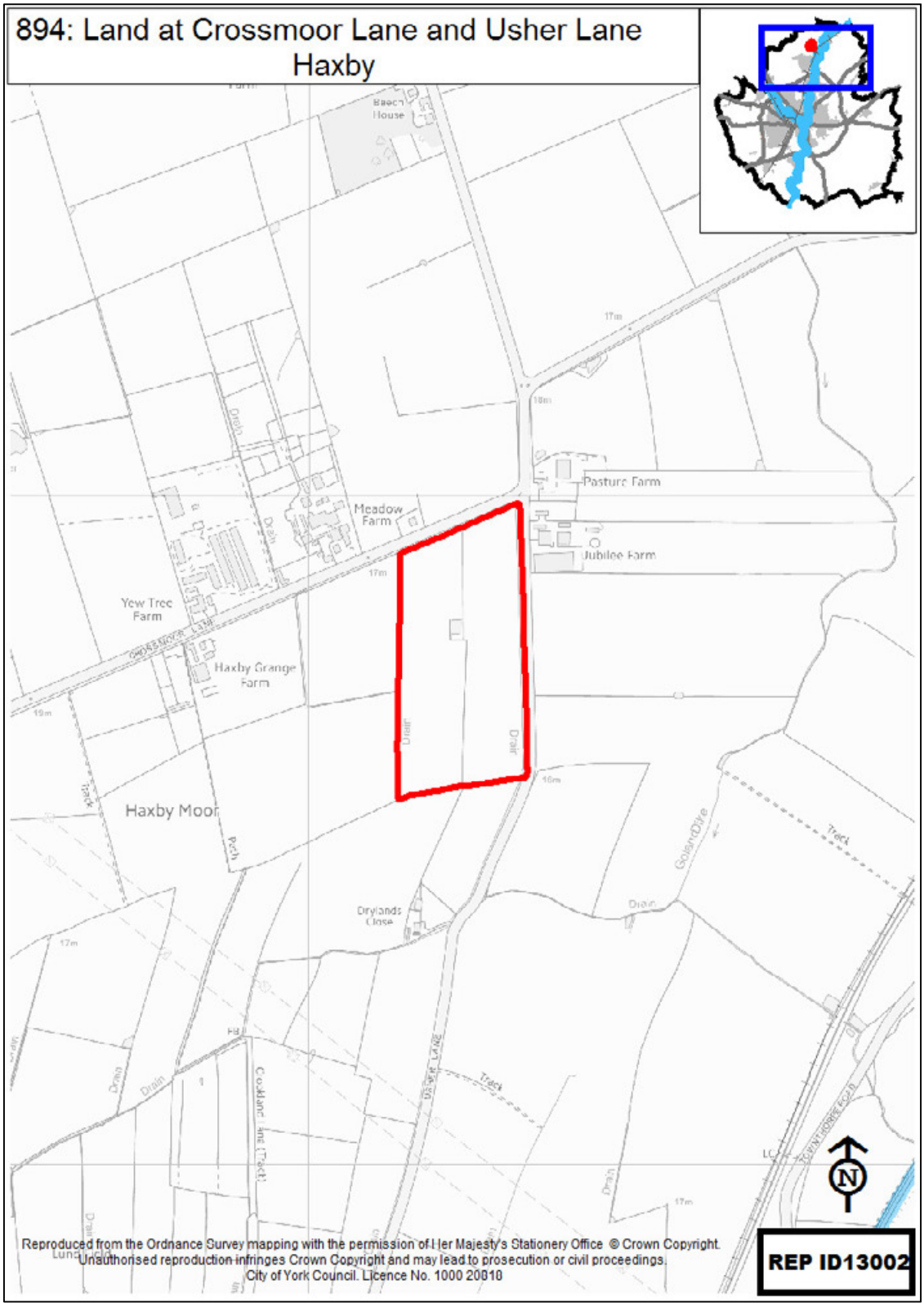
894: Land at Crossmoor Lane and Usher Lane
Haxby
Meadow Farm
Pasture Farm
Jubilee Farm
Yew Tree Farm
Haxby Grange Farm
Haxby Moor
Drylands Close
Drain
Track
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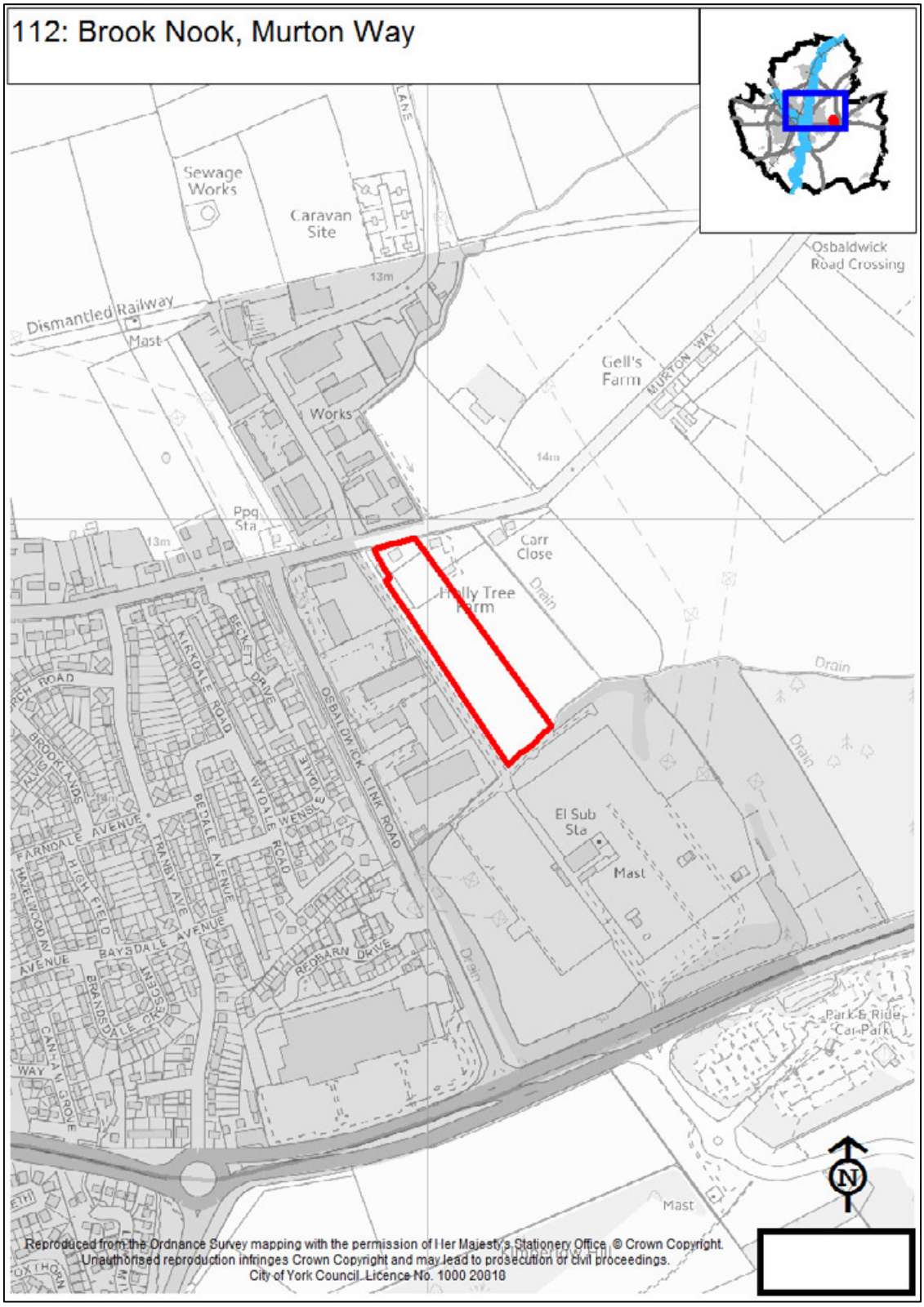
112: Brook Nook, Murton Way
Sewage Works
Caravan Site
Dismantled Railway
Mast
Works
Ppg Sta
Gell's Farm
MURTON WAY
Osbaldwick Road Crossing
Carr Close
Holly Tree Farm
Drain
El Sub Sta
Mast
OSBALDWICK LINK ROAD
BECKETT DRIVE
KIRKDALE ROAD
WYDALE ROAD
BECDALE AVENUE
TRAILBY AVE
BAYSDALE AVENUE
REDBARN DRIVE
FARNDALE AVENUE
BROOKLANDS
HIGH FIELD
HAZELWOOD
BRANSDALE CRESCENT
CANAL GROVE
Park & Ride Car Park
N
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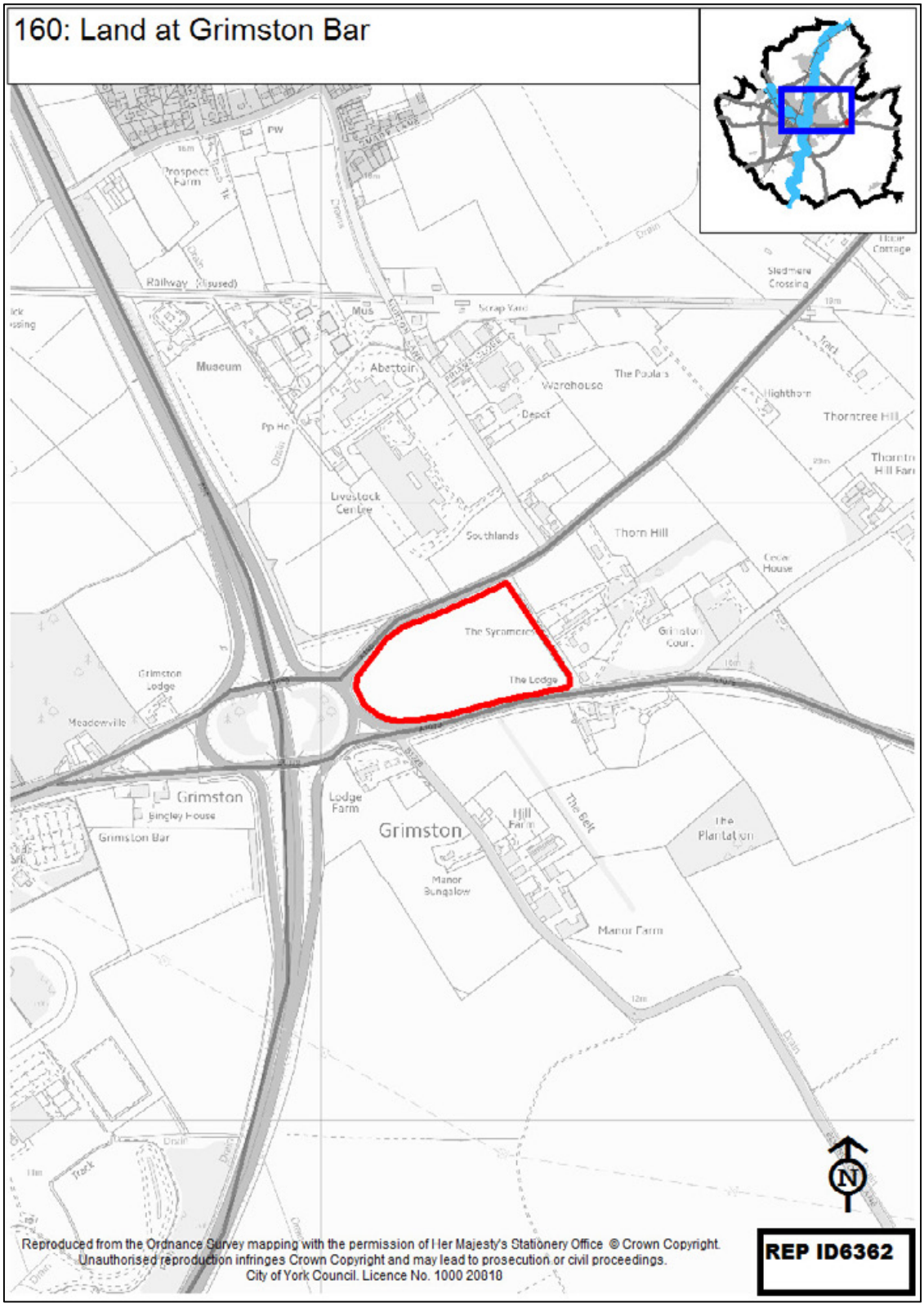
160: Land at Grimston Bar
Railway (disused)
Museum
Abattoir
Warehouse
Depot
Livestock Centre
Southlands
Thorn Hill
The Lodge
Grimston Lodge
Meadowville
Grimston
Bingley House
Grimston Bar
Lodge Farm
Grimston
Manor Bungalow
Manor Farm
Thorntree Hill
Sledmere Crossing
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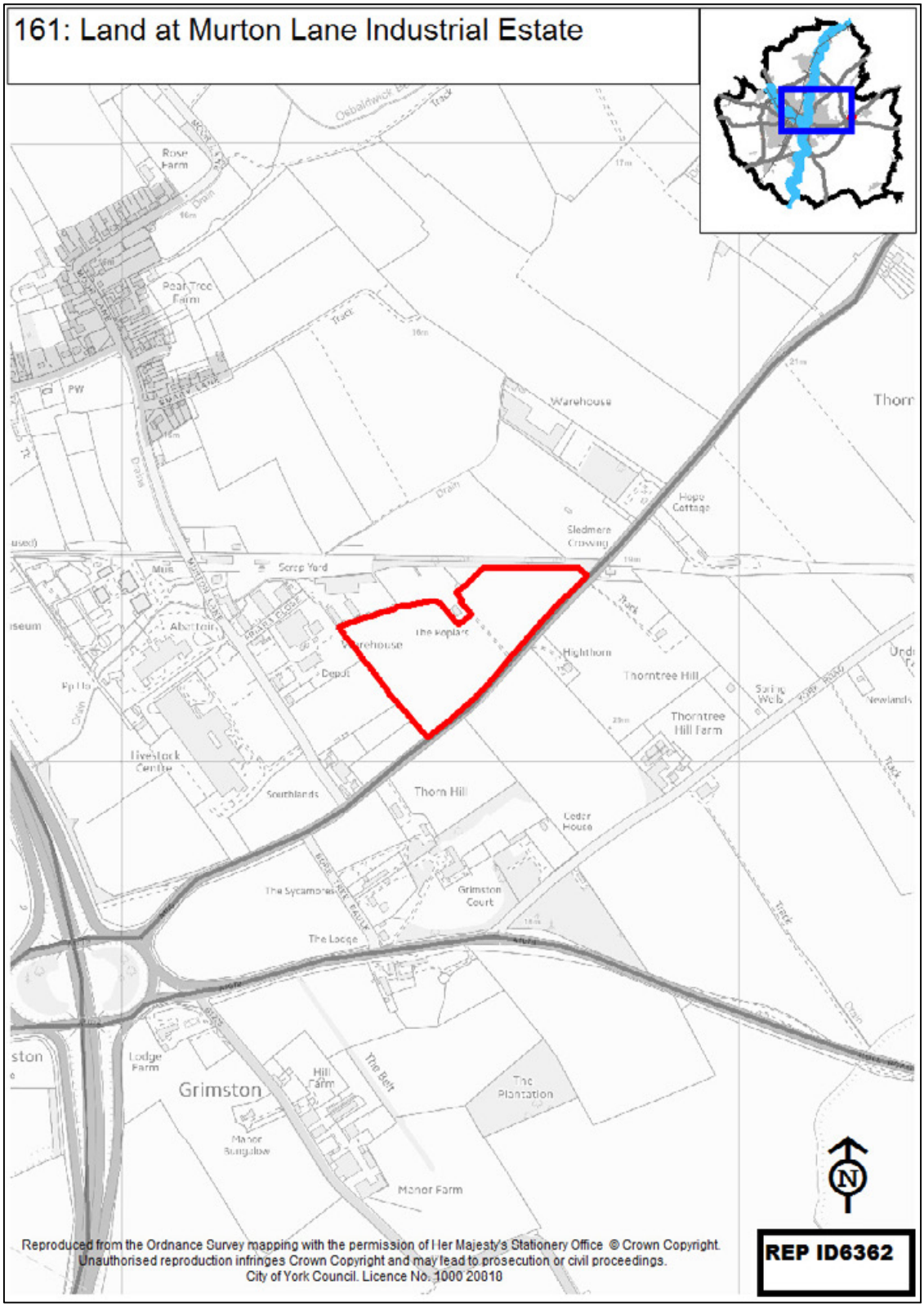
161: Land at Murton Lane Industrial Estate
Rose Farm
Peartree Farm
Warehouse
Hope Cottage
Sledmere Crossing
Scrap Yard
Mills
Depot
Highthorn
Thorntree Hill
Thorntree Hill Farm
Livestock Centre
Southlands
Thorn Hill
Cedar House
The Sycamores
Grimston Court
The Lodge
Lodge Farm
Grimston
Hill Farm
The Belt
The Plantation
Manor Bungalow
Manor Farm
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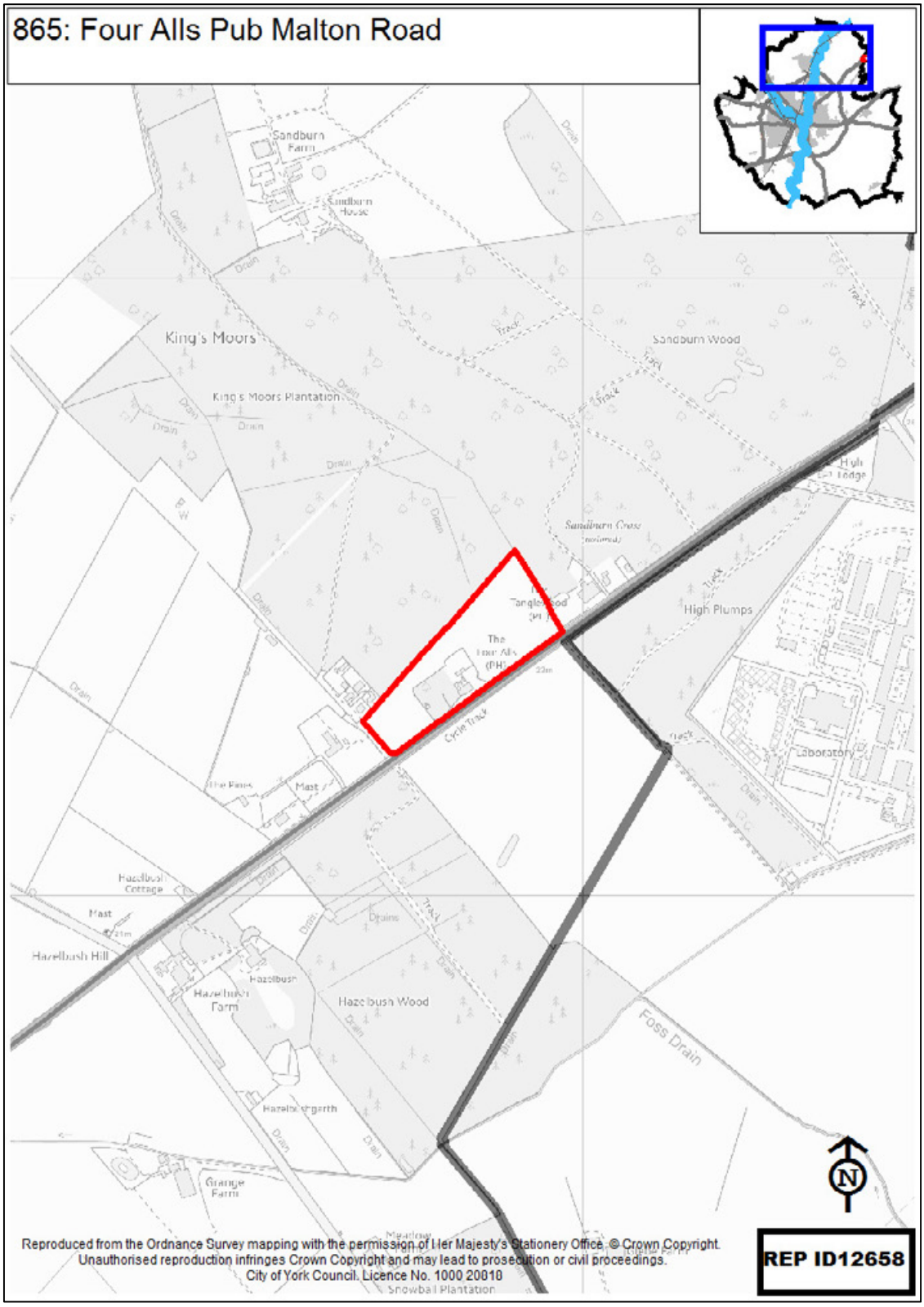
865: Four Alls Pub Malton Road
Sandburn Farm
Sandburn House
King's Moors
King's Moors Plantation
Sandburn Wood
High Lodge
Sandburn Cross
High Plumps
The Four Alls (PH)
Cycle Track
Laboratory
Mast
Hazelbush Cottage
Hazelbush Hill
Hazelbush Farm
Hazelbush Wood
Foss Drain
Grange Farm
Snowball Plantation
N
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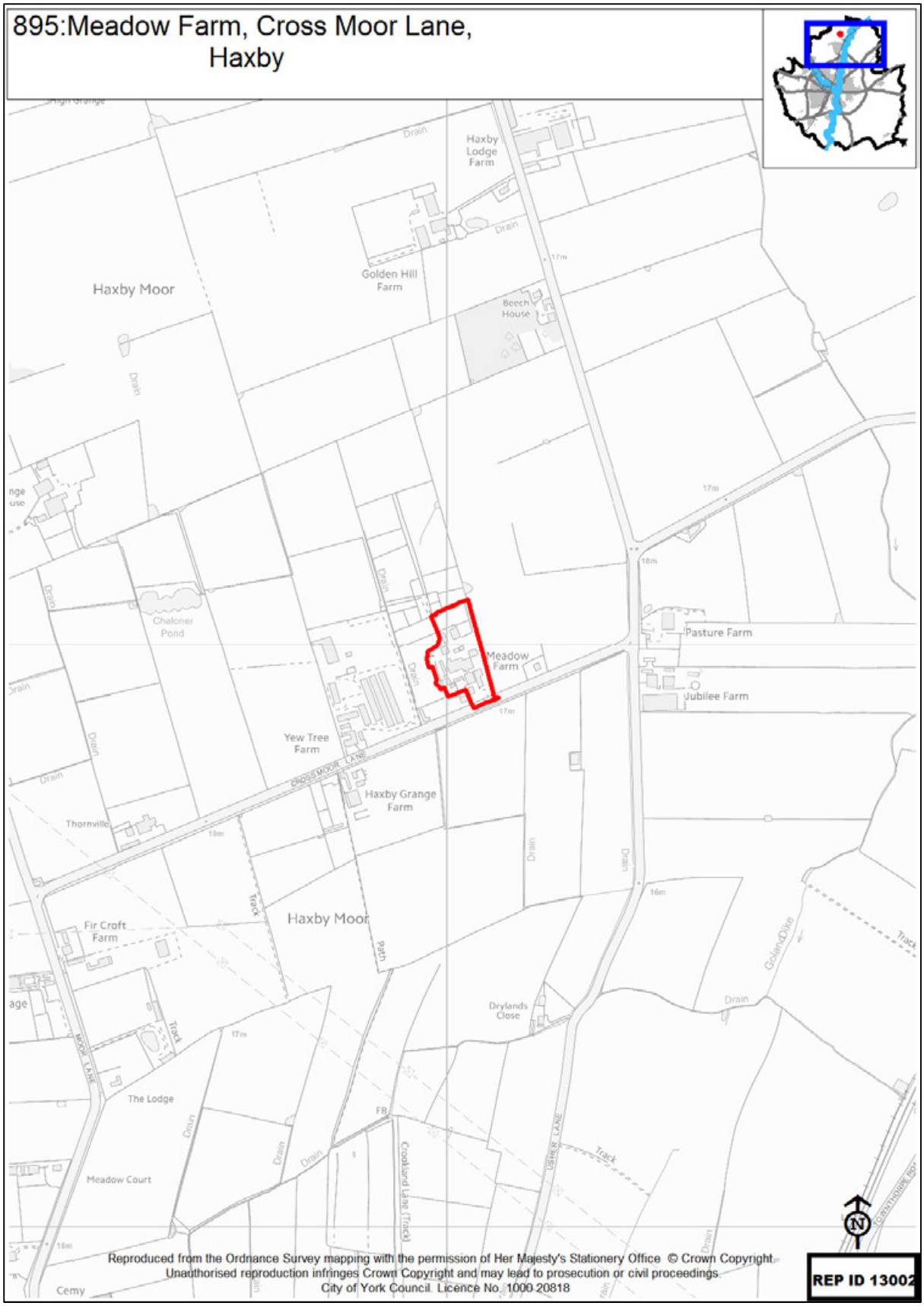
895:Meadow Farm, Cross Moor Lane, Haxby
Haxby Lodge Farm
Golden Hill Farm
Haxby Moor
Beech House
Chaloner Pond
Meadow Farm
Pasture Farm
Jubilee Farm
Yew Tree Farm
Haxby Grange Farm
Thornville
Fir Croft Farm
Drylands Close
The Lodge
Meadow Court
Crookland Lane (Track)
Golands Dike
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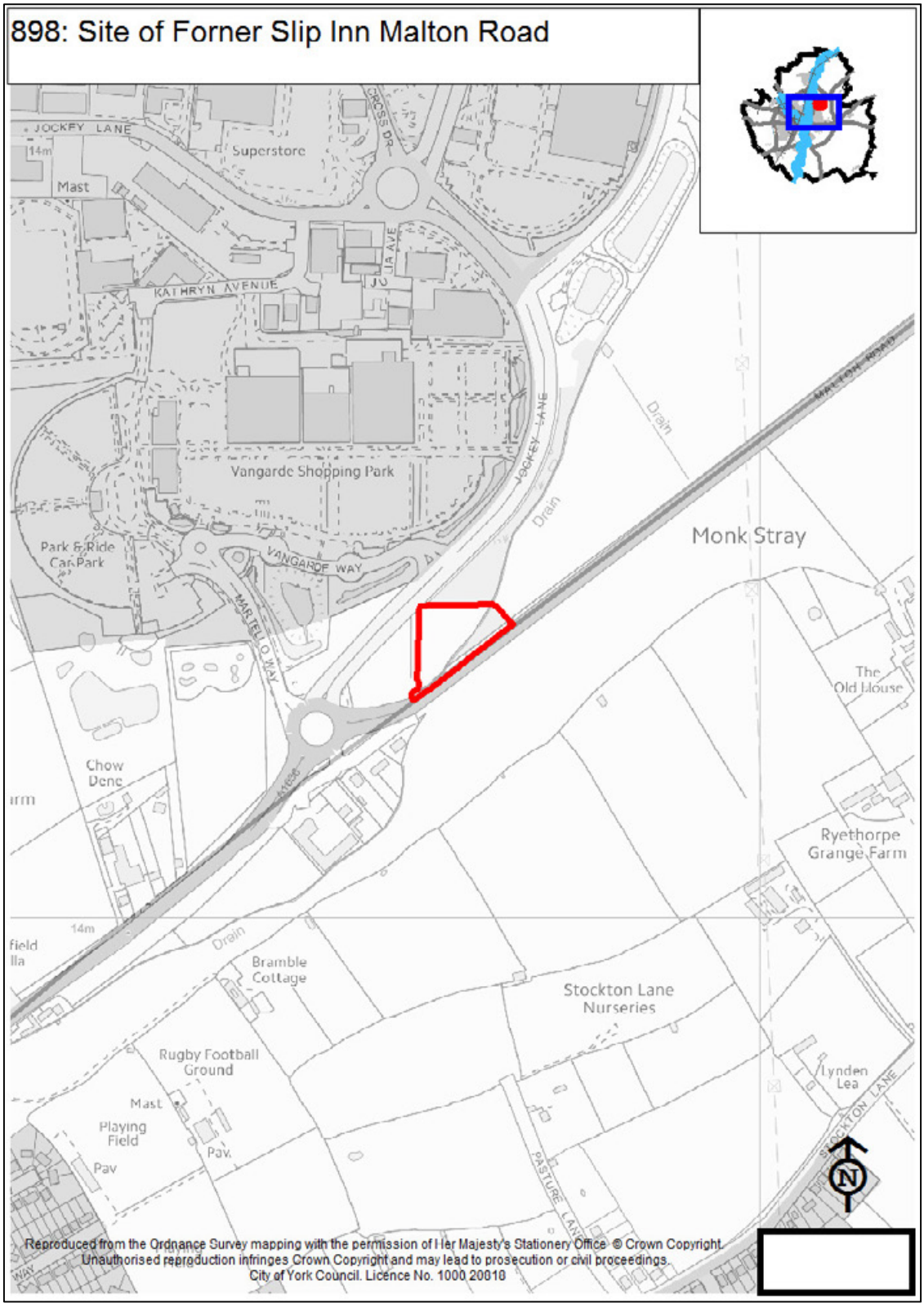
898: Site of Forner Slip Inn Malton Road
JOCKEY LANE
14m
Mast
Superstore
CROSS DR
KATHRYN AVENUE
JA AVE
Vangarde Shopping Park
Park & Ride Car Park
VANGARDE WAY
MARTELLO WAY
JOCKEY LANE
Drain
Drain
Monk Stray
The Old House
Chow Dene
Ryethorpe Grange Farm
14m
Drain
Bramble Cottage
Stockton Lane Nurseries
Rugby Football Ground
Mast
Playing Field
Pav
Pav
Lynden Lea
STOCKTON LANE
PASTURE LANE
N
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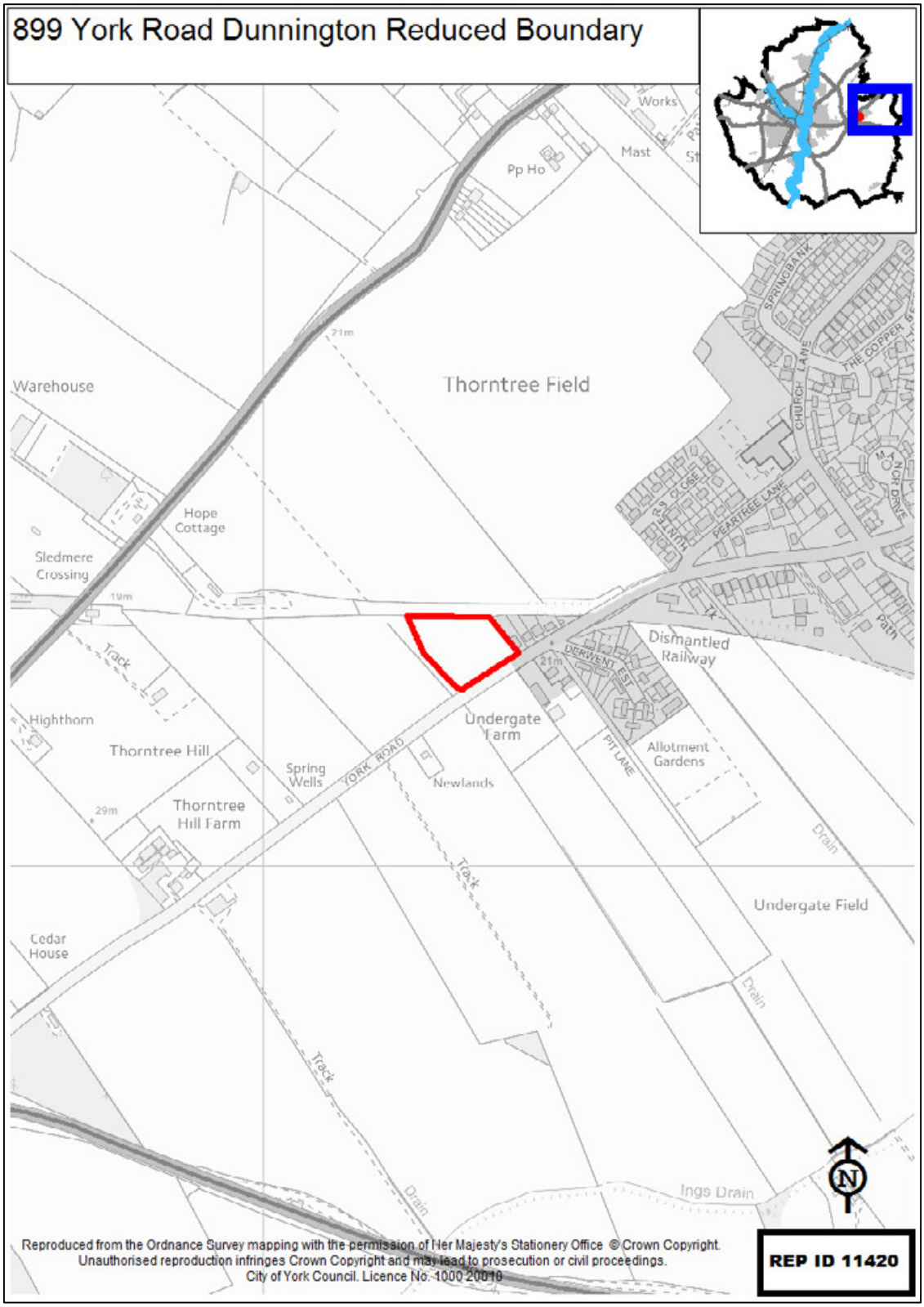
899 York Road Dunnington Reduced Boundary
Works
Mast
Pp Ho
Thorntree Field
Warehouse
Hope Cottage
Sledmere Crossing
Track
Highthorn
Thorntree Hill
Thorntree Hill Farm
Spring Wells
YORK ROAD
Undergate Farm
Newlands
Dismantled Railway
DERWENT EST
PIT LANE
Allotment Gardens
Undergate Field
Drain
Cedar House
Ings Drain
SPRINGBANK
THE COPPER
CHURCH LANE
MANOR DRIVE
PEARTREE LANE
HUNTS CLOSE
Path
N
REP ID 11420
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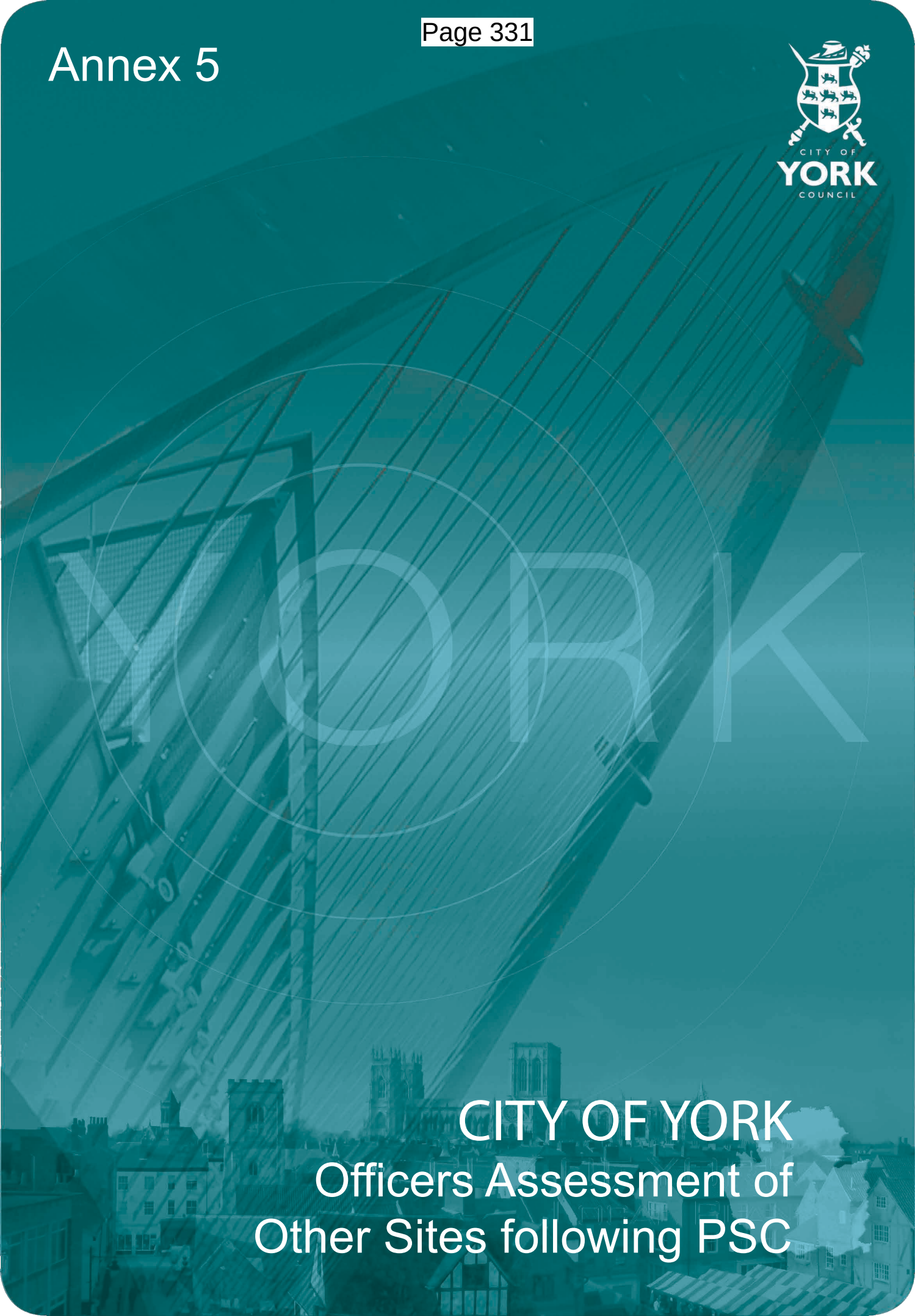
Annex 5



CITY OF YORK
Officers Assessment of Other Sites following PSC

Annex 5: Officers Assessment of Other Sites following PSC

Allocation Reference	Site Name	Officer Commentary
SH1	Heworth Croft	Response received from planning agents on behalf of York St John University reiterating their desire to see this site allocated for Student Housing. Sport England have confirmed they have no objection to re-development of site and confirmed that as the new Synthetic Outdoor Pitches at Mille Crux will be accessible by public transport they will provide a quantitative replacement for the facilities to be lost also will be better quality with improved management arrangements. Development needs to be restricted to land in FZ 3a and sequential/exceptions test submitted. The development footprint of the scheme also needs to be set back from River Foss to create an increased buffer but subject to detailed design in line with the Initial Flood Risk Assessment the flood risk management issues can be addressed. Whilst a Landscape Principles plan has been submitted and it is acknowledged that development of the site has the potential to improve environmental aspects of the space, it still constitutes an overall loss of open space along the Foss corridor (regional GI) and the impact needs carefully considering in detail through any planning application. The site is adjacent to the River Foss, within the River Foss Regional Green Infrastructure Corridor. The Extended Phase 1 Habitat Survey has provided information about the habitats on sites which were found to be of moderate interest, in particular the semi-improved grassland in the northern corner of the site which supports a colony of marbled white butterfly. The survey confirms that the River Foss is considered to be excellent commuting and foraging habitat for bats and suitable for otters, therefore the original comments are still valid with regard to providing a buffer which retains the existing trees and the design of any buildings and lighting on site. This would include any proposed bridge across the river. Further surveys still need to be undertaken to establish how bats are using the corridor (and site) in order to inform site design. **Officers consider that the site should remain as an allocation for Student Housing in the emerging Local Plan. See map 137 on page 5 .**

Annex 5: Officers Assessment of Other Sites following PSC

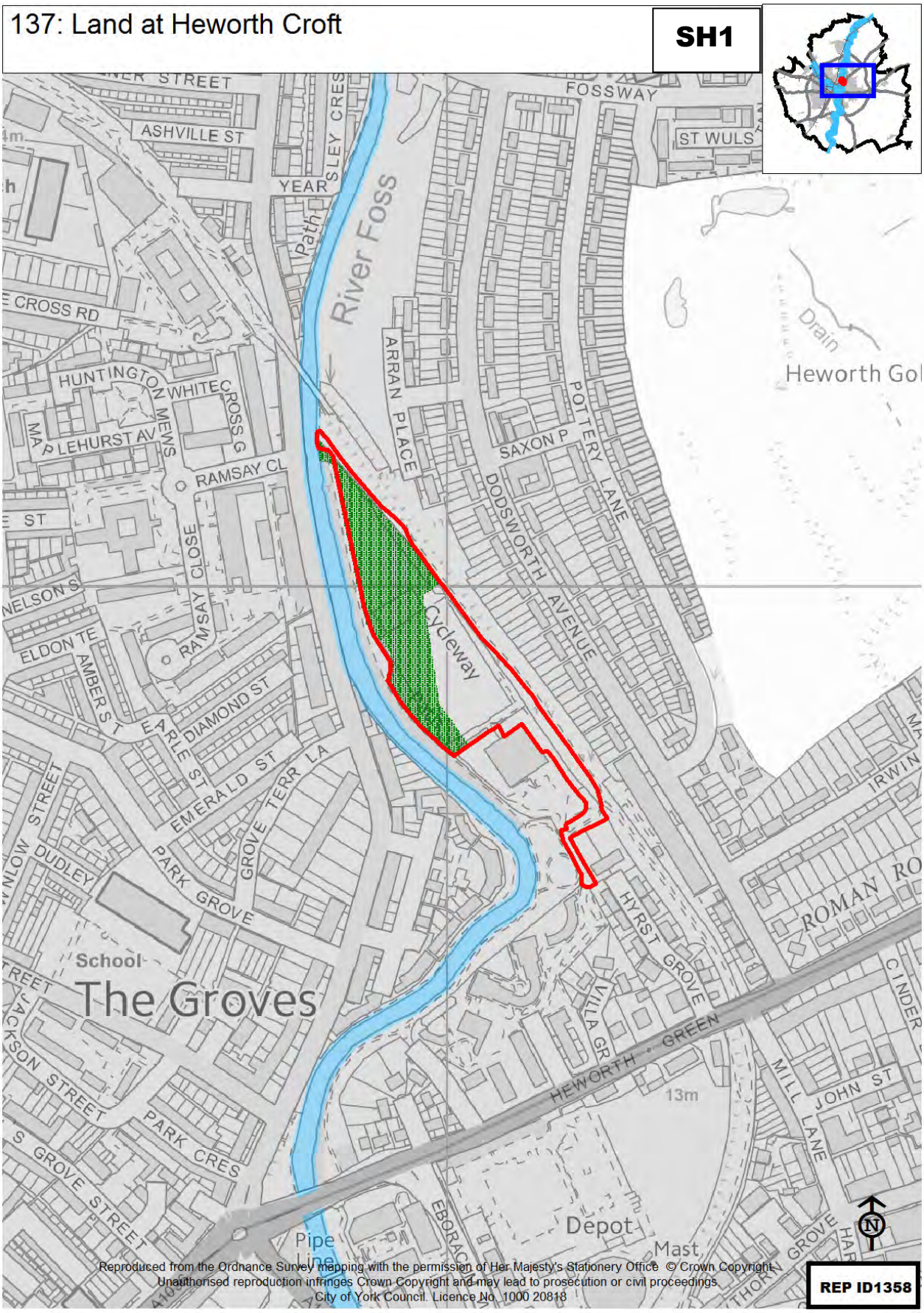
Site 883	Wheatlands Woodland Site of Local Interest 131.	A representation received from Planning Agents on behalf of the landowner proposes de-allocation of Site of Local Interest to nature conservation (SLI) Wheatlands Woodland was established approx. 20 years ago as a community woodland with permissive access to the public and managed for nature conservation. Wheatlands Woodland is noted as a 'Site of Local Interest' (Ref: 131) as a young-mature broadleaved woodland with sown wildflower grassland. Sites of Local Interest are sites that do not fulfil the criteria for the local designation as a Site of Importance for Nature Conservation (SINC), but on which there is some interest and they do have significant value in helping to maintain the network of biodiversity across York. The woodland is connected to a local green infrastructure corridor '12 The Ring Road'. Young plantations may not have accumulated the ecological value of ancient woods, but they still support a range of wildlife. For example bat activity in the 2015 survey although low was focused around the woodland and connecting hedgerows, and the ecology report draws the conclusion that in the context of the wider area which is largely devoid of significant foraging resources, the hedgerow on site, and the woodland along its eastern boundary represent relatively high value foraging habitat. It will also provide habitat for nesting birds, invertebrates and small mammals. **Officers consider that the site should remain as a designated site of Local Interest to Conservation in the emerging Local Plan. See map 883 on page 6.**
Site 139	BioRad	The BioRad site has been considered in the past for its potential as a housing allocation as well as for openspace in conjunction with the adjacent Mille Crux Sports Pitches managed by the University of York St John. The site (ref 139) was analysed for its potential for residential use against our site selection methodology. The overall conclusion stated that the site was rejected for residential use as it failed criteria 1, due to being within a regional green corridor. The site was included as openspace in conjunction with York St John University under policy U5 in earlier revisions of the plan. One of the requirements of the NPPF however is to understand whether the site has a willing landowner for a particular use and thus that the site is available. The Tees, Esk and Wear Valleys NHS Foundation Trust have identified the Biorad site as their preferred location for a new hospital. Our initial analysis against criteria 1-3 of the methodology

	Bio-Rad Continued	would support the site being suitable for this use as the requirements for hospital use differ to the requirements for residential development. **Officers propose to remove this land from Policy U5 and allocate it as a site for Health Care Facilities in the form of a new Mental Health Hospital for York. See map 139 on page 77.**
OS1	Land North of Manor CE Academy	A planning application by Manor CE Academy was approved in January 2014 (13/03354/FULM) for: *'Change of use of agricultural land to sports pitches, allotments, and informal landscaped open space, construction of hard surfaced recreational area, excavation of pond and associated footpaths, car parking and a 6m high ball fence'.* Consequently the land to the north west of the Manor CE Academy has been shown on the Proposals Map as both Educational Establishment and New Open Space (complimenting the existing Educational Establishment allocation on the existing Manor CE Academy site). NYCC are still in the process of acquiring this land for the use of Manor School **Officers propose no change for this site, and that is should remain allocated as Openspace/Education OS1. See map 230 on page 8.**
OS2	Land South West of Heslington Playing Fields	This site was (Site 232) was originally submitted through the 2012 Call for sites by the Council Sports Department as the Playing Fields Association were in negotiation with the landowner and farmer in the interest of creating new playing fields for the community however there has been no advancement from the Parish Council or other bodies in bringing the site forward as open space. **Officers propose to remove this site (OS2) as there is no certainty over its delivery. See map 232 on page 9.**
OS3	Land to North of Poppleton Juniors, Millfield Lane, Poppleton	This site was (Site 237) was originally submitted through the 2012 Call for sites by the Council Sports Department. It was proposed that the site could be accessed through the adjacent sports club and that the site could provide Cricket pitch facilities for the community once the existing agricultural tenancy had expired. **Officers propose no change for this site (OS3) and that it should remain allocated as Openspace OS3. See map 237 on page 10.**

Annex 5: Officers Assessment of Other Sites following PSC

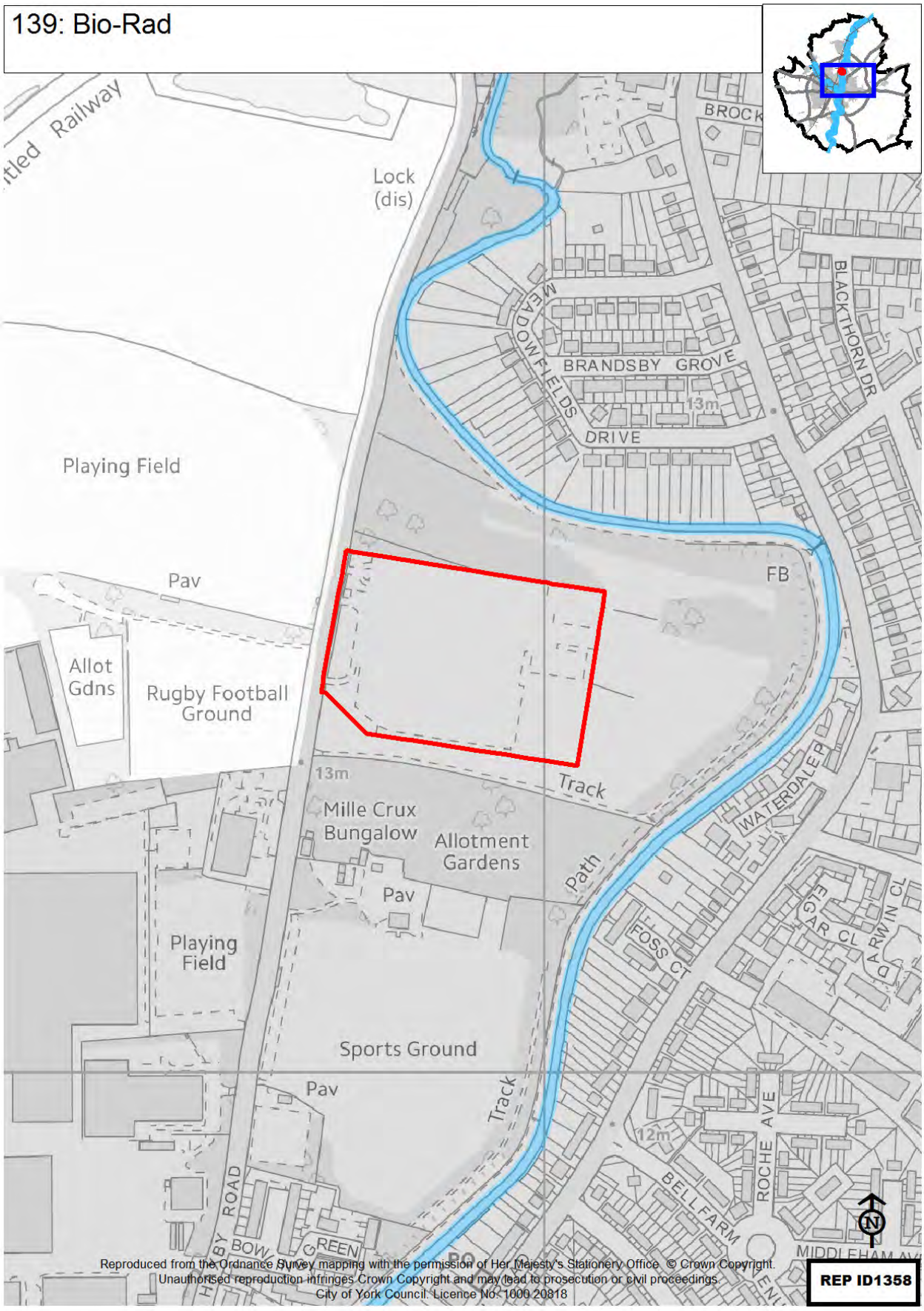
OS4	Land at Temple Road, Copmanthorpe	This site was to be brought forward through the funding of housing allocation ST12 and initially intended to be used in conjunction with Copmanthorpe Sports Club, although Janet O'Neill argued that the sites open space provision would be provided for in the strategic green space to the west of ST12). As ST12 is no longer proposed a housing allocation this parcel of land is no longer though to have a willing landowner for the purpose of developing the site as openspace and would no longer have the funding to enable its delivery. Concerns have also been raised as to the accessibility of the site from the existing village given the speration of the railway line. **Officers propose to remove of this site (OS4). See map 206 on page 11.**

Annex 5: Officers Assessment of Other Sites following PSC



Annex 5: Officers Assessment of Other Sites following PSC

Annex 5: Officers Assessment of Other Sites following PSC



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Annex 5: Officers Assessment of Other Sites following PSC

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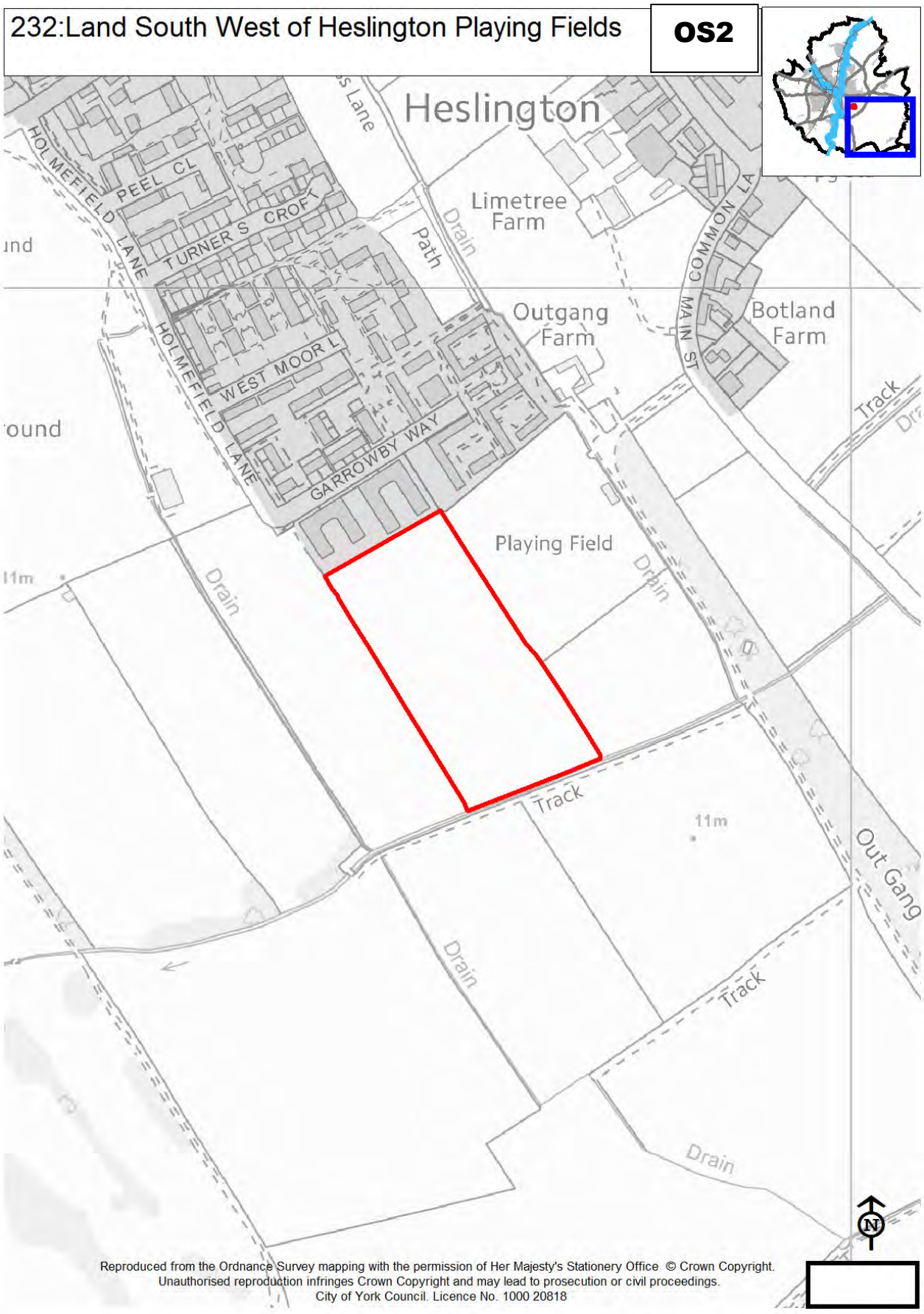
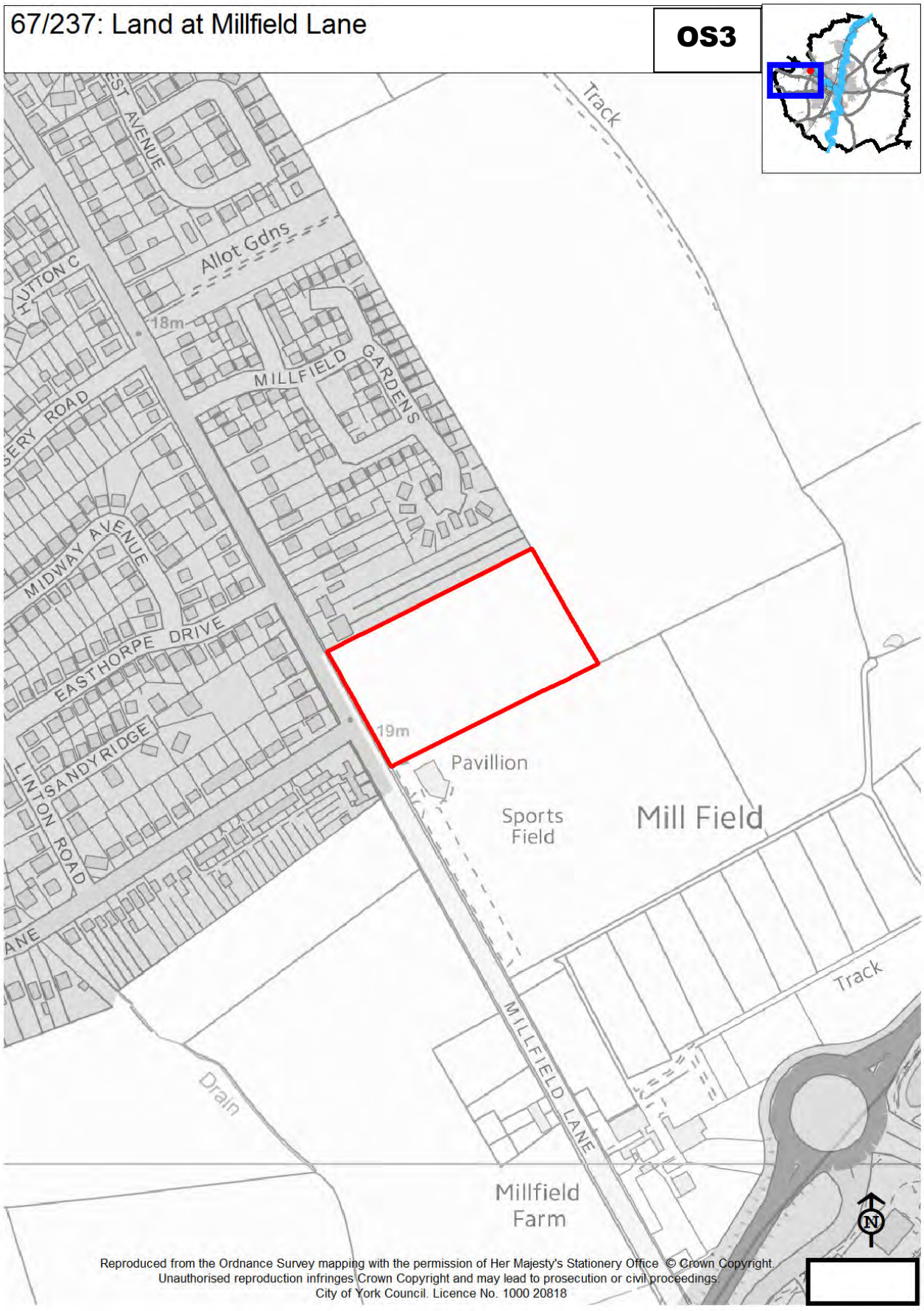
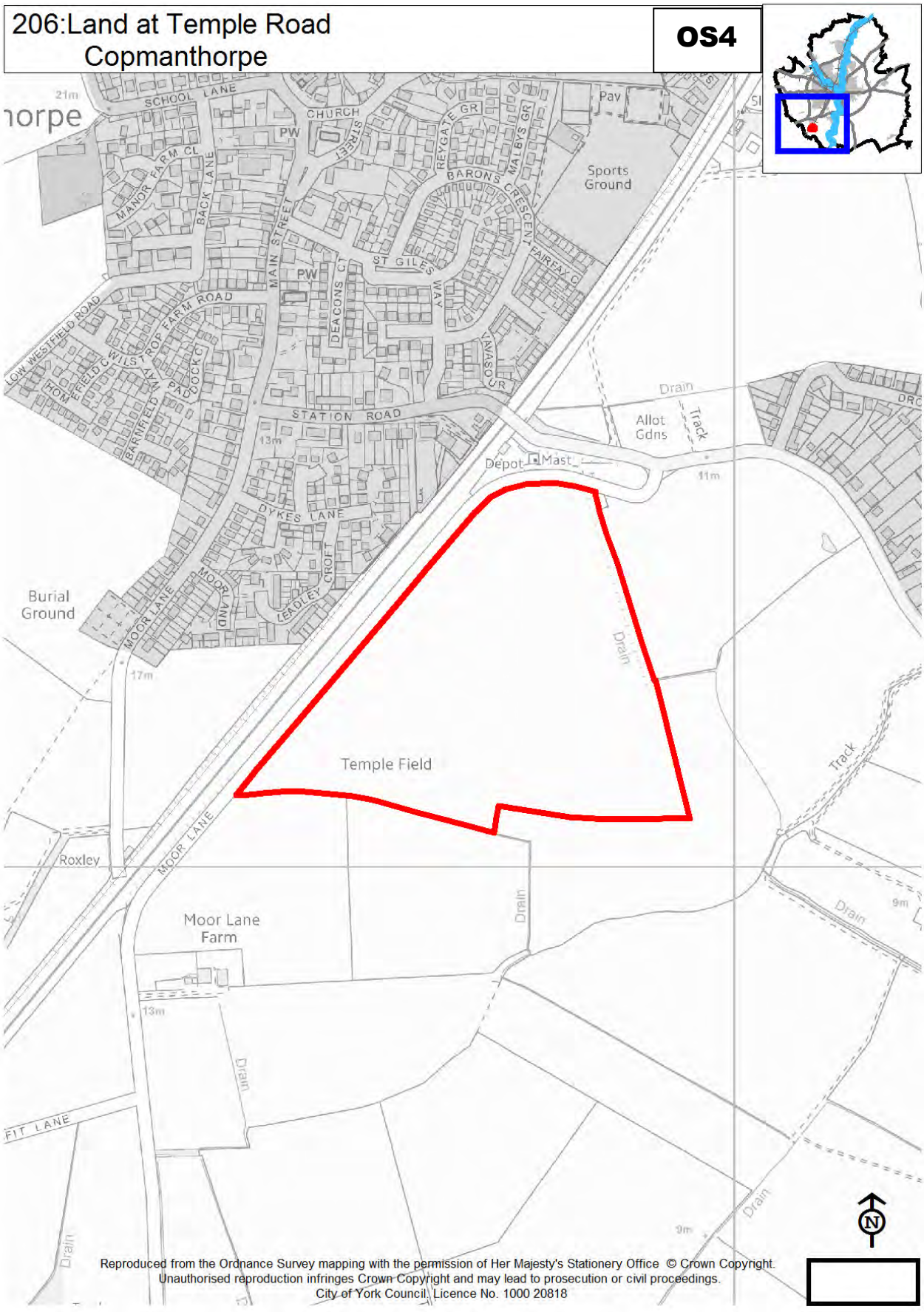


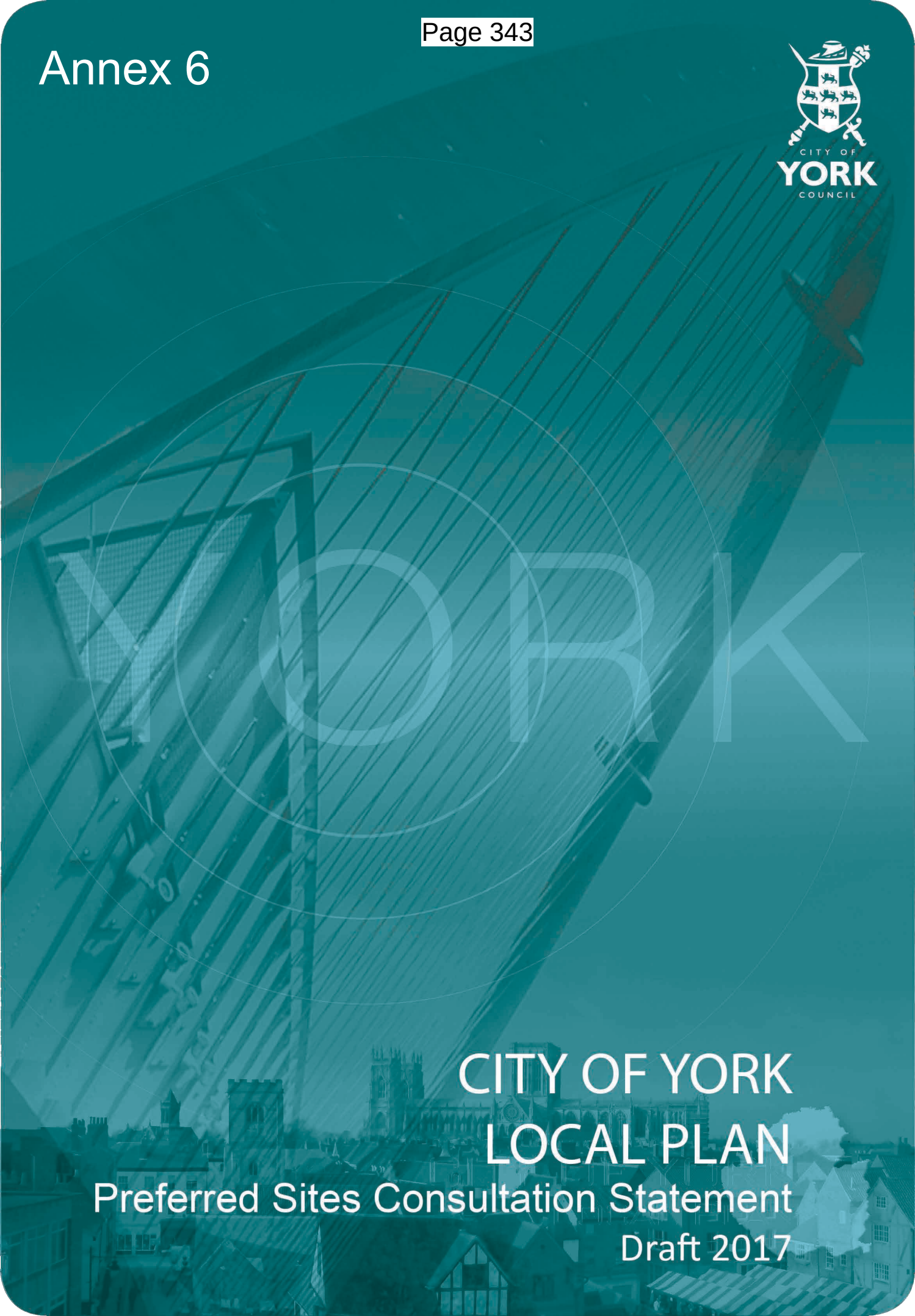
Annex 5: Officers Assessment of Other Sites following PSC



Annex 5: Officers Assessment of Other Sites following PSC



Annex 6



CITY OF YORK LOCAL PLAN

Preferred Sites Consultation Statement

Draft 2017

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Annex A Copy of comments form
Annex B: List of Local Plan database consultees
Annex C: Copy of letters/email to consultees

1.0 Introduction

1.1 Following approval at Executive on 30th June 2016, 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. At this stage of plan preparation there is no regulatory framework to adhere to, however the proposed consultation strategy is in accordance with the Council's adopted Statement of Community Involvement (2007).

1.2 The purpose of this report is to summarise this Preferred Sites consultation; it outlines 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. At the Plan's examination stage we will need to demonstrate that we have considered 'reasonable alternatives'; this process of iterative consultation will be critical in evidencing the Plan's development.

1.3 Copies of all responses received can be found on our website. A formal regulation 22(1)(c) statement will be prepared at such time as the local plan is submitted to the Secretary of State for examination. This statement relates only to responses received through the formal consultation period.

2.0 Consultation Documents

2.1 A number of documents were produced as part of the consultation to inform people of the process, how they could respond, and ways in which they could contact the Planning and Environmental Management team.

2.2 The following main consultation documents were produced:

- Local Plan – Preferred Sites (2016) including zone based maps and individual site plans;
- Strategic Housing Market Assessment & Addendum (2016)
- Employment Land Review (2016)
- Windfall Analysis Technical Paper (2016)
- Sustainability Appraisal
- Local Development Scheme (2016)

2.3 A comments form was available (see Annex A) and a series of large scale maps illustrating the further sites on an area by area basis were also prepared to help people interpret how the further sites relate to their communities. All relevant supporting documents and evidence base documents associated with the local plan were already published and available on the council's website, with a direct link provided from the main further sites consultation webpage.

3.0 Who was invited to make representations

3.1 To support the production of York's Local Development Framework (now Local Plan), the Council have compiled a database to include statutory/specific consultation bodies and stakeholders, alongside individuals and groups who have registered an interest in the York development plan process, or have expressed an interest in being kept informed of the Plan's progression towards adoption (please see Annex B for further details).

3.2 All Members received a briefing note setting out the proposed consultation strategy, and a copy of the main documents was placed in the Member's group rooms at West Offices. Consultation with neighbouring authorities, as part of the duty to cooperate, consisted of a series of 1-1 meetings and utilised existing structures through Local Government North Yorkshire and York and the Leeds City Region. Internal consultation was also undertaken with relevant officers.

3.2 Specific Consultees include Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and parish councils. This group of consultees 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.

3.3 All other consultees on our database (around 10,000), which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York, 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 sent to consultees can be found at Annex C. In addition, the Council sought to further publicise the Preferred Sites consultation and give details on how and when comments could be made. This is discussed in Section 4 below.

4.0 How people were invited to make representations

4.1 The Local Plan Preferred Sites consultation was undertaken in accordance with the Council's adopted Statement of Community Involvement (2007).The consultation strategy was produced alongside colleagues in the Council's Communications Team and Neighbourhood Management Team. The consultation included:

- a press release to advertise consultation and how to respond was issued 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 (see below);
- exhibition boards and consultation documents including response forms available at ward committee meetings;
- meetings with statutory consultees[1] 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.

4.2 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.

[1] Statutory consultees are Historic England (HE), Environment Agency (EA), Natural England (NE) and Highways England (HEng).

4.3 A series of targeted meetings and exhibitions were arranged to publicise the consultation and engage with interested parties. Six exhibitions were planned at locations across the city, to coincide with the Zones set out in the PSC document. 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.

- 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

A further exhibition was held on request, targeting Holgate Ward, with more focus given to the York Central development (St Paul's Church, Holgate – 14th September 2016).

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

- Osbaldwick and Derwent - 12th July
- Haxby and Wigginton - 13th July
- Micklegate - 13th July
- Dringhouses and Woodthorpe - 19th July
- Huntington and New Earswick - 27th July
- Strensall Ward - Walkabout Monday 8th August
- Clifton Ward - 23rd August
- Rural West Ward - 23rd August
- Fulford and Heslington - 7th September

4.5 A briefing session for Parish Councils was held in July with the York Local Council Association, which includes representatives from all Parish Councils across York.

4.6 In addition to the more formal approaches for cooperating with prescribed bodies and other relevant organisations, City of York Council has engaged on an on-going 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. The following meetings took place as part of Preferred Sites consultation.

East Riding of York Council	Discuss City of York Local Plan Preferred Sites Consultation Document and potential cross-boundary issues.	26/07/16
The Environment Agency (EA)	Discuss potential flood alleviation schemes	01/09/16
Harrogate Borough Council	CoYC and HBC to update each other of the latest position regarding their respective local plans and discuss cross-boundary issues. Also discuss the need for HBC to be consulted on the Poppleton Neighbourhood Plan HRA.	25/04/17
Historic England	Discuss City of York Local Plan Preferred Sites Consultation (PSC) Document and strategic issues	18/07/16
North Yorkshire County Council	Discuss City of York Local Plan PSC Document and potential cross-boundary issues.	31/08/16
Selby District Council	Discuss City of York Local Plan PSC Document and potential cross-boundary issues.	29/09/16
York, North Yorkshire and East Riding Local Enterprise Partnership (LEP)	LEP-chaired workshop to enable CYC's officers to receive / discuss views from the officers attending representing prescribed bodies to help CYC show that cooperation under the duty can or will lead to improved outcomes as the CYC Local Plan progresses from 'Preferred Sites' to 'Publication Draft'.	13/10/16
Yorkshire Water	Confirm that there are not likely to be any water supply or waste water treatment 'showstoppers' and discuss Yorkshire Water's infrastructure	12/08/16

	investment plans.	

This table excludes regular sub-regional or sub-area meetings, and meetings for specific projects, where formal minutes or notes are otherwise available, 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 Group

4.7 Twitter/Facebook was used to publicise the start of the consultation and again towards the end of the consultation period to make people aware that the deadline for comments is approaching.

5.0 Main issues raised

1.1 The purpose of this section is to outline the main issues raised by respondents as part of the further sites consultation.

1.2 It is important to note that the Preferred Sites consultation document is not a full Local Plan. Consultees were made aware that responses to this consultation should only relate to the sites and / or information set out in the Preferred Sites (2016) Consultation document or associated technical documents, and that further consultation on a Publication Local Plan would take place at a later date. However, acknowledging that respondents commented more widely on Local Plan 'themes', our summary aims to capture responses in the widest sense – Section 6 provides thematic summaries of key issues raised. It should be noted that the views expressed below are of those who submitted representations as part of the consultation and not necessarily the views of City of York Council. For clarity, a single consultee's response may have captured multiple times in reference to a single site (where they have objected to some elements of the site proposal, but support others, for example).

5.2 Respondents include residents, interest groups, parish councils, prescribed bodies[2], developers, agents and land owners.

[2] Under the Duty to Co-operate Local Authorities are required to demonstrate cooperation in plan making with adjoining authorities and other organisations. The Town and Country Planning (Local Planning) (England) Regulations 2012 prescribes those bodies to which the Duty to Co-operate applies.

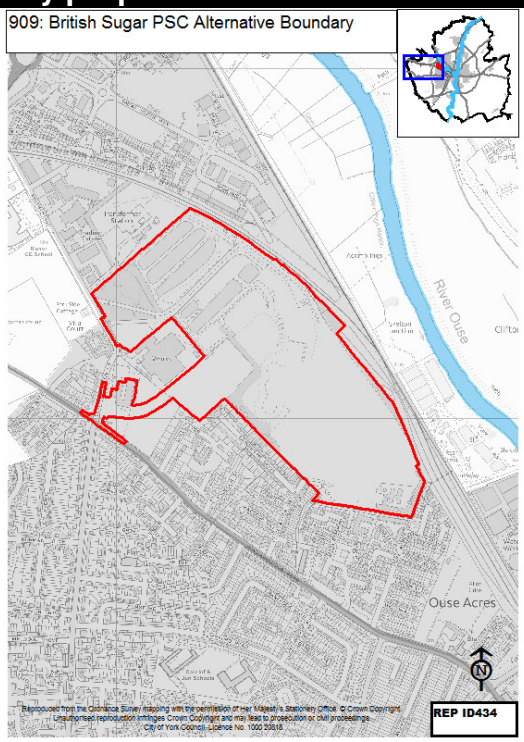
Potential Strategic Housing/Employment Allocations

ST1: British Sugar
ST2: Civil Service Sports Ground
ST4: Land Adj Hull Road
ST5: York Central
ST6: Land North of Grimston Bar
ST7: Land East of Metcalfe Lane
ST8: Land North of Monks Cross
ST9: Land North of Haxby
ST14: Land to West of Wigginton Road
ST15: Land to West of Elvington Lane
ST16: Terrys
ST17: Nestle South
ST19: Northminster Business Park (formerley E17)
ST26: Land South of Elvington Airfield
ST27: University of York
ST31: Land South of Tadcaster Road, Copmanthorpe
ST32: Hungate (Phases 5+)
ST33: Station Yard, Wheldrake

ST1: British Sugar			
Total representations: 52	**Support: 21**	**Objections: 11**	**Comments: 23**
Key Issues Raised			
Support	Amongst others, Nether Poppleton Parish Council and Upper Poppleton Parish Council voice general support for the principle of development of this Brownfield site as a priority over greenbelt land and other preferred sites, particularly its completion in advance of ST2. Additional comments made around the site's mix of housing, density, transport and access, biodiversity and open/play space provision. British Sugar is committed to the regeneration of the former British Sugar site and has worked with CYC to demonstrate the deliverability of the site; they are working with Officers towards a target determination date for the submitted planning applications towards the end of this year. The site will provide significant housing numbers, in line with CYC's spatial strategy and vision. Note their objections to policy content below.		
Objection	British Sugar make a number of suggested changed to the drafted policy wording around the following issues: estimated site yield/mix, Green Infrastructure, Access and Movement and the range of supporting amenities to be provided on site. RSPB notes that there is currently insufficient information on the potentially negative impacts and required mitigation. This must be		

	addressed before this allocation is adopted. Other general objections relate to concerns around the scale of development proposed, impact on congestion (noting the A59), potential to exacerbate flooding, and the availability of supporting amenities/services.
Comment	York Bus forum comment on the need to encourage public transport usage. A number of responses refer to the need for the development to create a successful new place with all the required facilities. Comments refer to concerns around protecting the site's environmental quality (AQ/noise/ contamination), lack of need for employment land, need for affordable housing and elderly persons housing, lack of infrastructure (education and medical facilities etc), impact on the natural environment and transport issues with increased traffic.

ST1: Alternative boundary proposed



British Sugar

Representation recieved includes submitted map above

ST1: General Area comments for Area 5

Total representations: 23	**Support: 1**	**Objections: 6**	**Comments: 10**

Key Issues Raised	
Support	General support for development in area 5
Objection	Concern for the cumulative effect of development in this area of York, and its impact on increased congestion/traffic, inadequate drainage and infrastructure/services.

Comment	In general, comments reflect concerns raised above, namely in relation to the large amount of housing proposed in this area of York, and its impact on increased traffic inadequate drainage and lack of infrastructure and services.

ST2: Civil Service Sports Ground			
Total representations: 41	**Support: 8**	**Objections: 17**	**Comments: 17**
Key Issues Raised			
Support	Miller Homes state that the site's sustainable location and lack of environmental/technical planning impediments make it a suitable, 'inclusive' development opportunity, offering affordable housing and a mix range of sizes, types and tenures. The site has a willing landowner and is controlled by a national house builder. Housing is deliverable within the first 5 years of the plan. Note that the capacity of the site is suggested as 292 and whilst this presents a good estimate of capacity this should be expressed as an approximate. Historic England supports the Plan's stated Planning Principles, protecting land to the southern part of the site from development; this would help preserve the historic character and setting of the City. British Sugar does not object in principle to the site's development – note further comments below.		
Objection	A significant factor for those objecting to development of this site is congestion, due to the site's close proximity to the already highly congested northwest portion of the northern ring road, for which no provision for the increased traffic seems to be forthcoming. Other common concerns raised in objecting to the site's development include: lack of need for housing on this site or reference to 'overdevelopment'; loss of Green Belt and querying the site's brownfield status; insufficient services and amenities to support new development (lack of education provision/nursery space/healthcare); loss of sports facilities and open space.		
Comment	British Sugar refers to the Plan's supporting text, noting that the need for additional primary school capacity generated by this development (but delivered on the British Sugar site) should be properly funded through S106 contributions. Further, as both the British Sugar / former Manor School sites take their primary access from Boroughbridge Road, it is important that the Civil Service development is responsible for addressing its own impacts. Accordingly, any highways improvements that may be required to mitigate impacts from the development of Site Ref. ST2 on the surrounding highways network should be funded by the developers of the site only and should not unduly burden development by British Sugar or other neighbouring landowners. The allocation states that 'the longer term potential for the British Sugar site to have rail links to the York rail station is being investigated and this could also increase the accessibility of this site in the longer term'. The proposed development of the British Sugar site does not prejudice the future provision of such rail links at a future time should this be feasible and		

	viable. Amongst other respondents, both Nether and Upper Poppleton Parish Council state that the site should not be developed until at least 500 houses have been developed on ST1 and its impact on services is fully analysed. Comments reflect the general concerns of those objecting to the scheme. A number of comments (including from the Parish Council's) ask that further information is made available before development progresses further, including around: the likely housing mix; nature of supporting infrastructure (including school, nursery and healthcare provision); further traffic impact analysis and mitigation measures; archaeological site inspections; impact on nature conservation.

ST2: General Area comments for Area 5			
Total representations: 23	**Support: 1 relevant**	**Objections: 5 relevant**	**Comments: 11 relevant**
Key Issues Raised			
Support			
Objection	The general public express concerns for the large amount of housing in this area of York. There are also concerns for; increased traffic inadequate drainage and lack of infrastructure and services.		
Comment	The general public express comments on the large amount of housing in this area of York. There are also comments on; increased traffic inadequate drainage and lack of infrastructure and services.		

ST4: Land adj Hull Road			
Total representations: 22	**Support: 11**	**Objections: 6**	**Comments: 5**
Key Issues Raised			
Support	Amongst others, Heslington Parish Council, Heslington Village Trust, Melrose Industries Plc and Persimmon Homes support the principle of housing development on the site. Both Heslington Parish Council and Heslington Village Trust alongside other respondents support family housing and affordable housing on site but state that student housing should be specifically excluded. Melrose Industries Plc confirm that the landowner is supportive of the allocation., its access proposals and suggested development density. Persimmon Homes confirms that there are two full planning applications for development of the site. Persimmon Homes has an option agreement with the owner and it is their intention to commence development as soon as possible.		

Objection	Cllr Waters objects to development on the following grounds: site should remain as part of green corridor into the city; development will compromise Jubillee Wood and boundary hedgerows; traffic on Hull Road makes residential use untenable (see Inspector's comments re Sainsbury's/B+Q); drainage concerns; lack of local school space. York Ornithological club states that, in the absence of suitable mitigation measures, they oppose the development of the site. "We believe that a development of over two hundred houses should include appropriate recreational open space on site and that footpaths, hedgerows etc should be routed to guide residents and their pets away from the wildlife sensitive areas of the Heslington East campus."
Comment	Historic England raise no objection to the site's allocation, but comment on its proposed use, stating that it would be better considered in the context of the future needs of the University, enabling a positive reduction in the scale of ST27. Other comments reflect concerns raised above, namely in relation to increased student housing, lack of infrastructure (medical facilities and educational facilities etc), loss of green field land, transport issues with increased traffic and the impact on drainage.

ST4: General Area comments for Area 4			
Total representations: 9	**Support: 1 relevant to ST4**	**Objections: 1 relevant to ST4**	**Comments: 3 relevant to ST4**

Key Issues Raised	
Support	General support for Area 4's proposals.
Objection	Concern that the impact of development proposed has not been tested yet.
Comment	Issues raised include the impact of development on character and setting of the City and imbalance in the area's housing stock (studentification).

ST5: York Central			
Total representations: 103	**Support: 16**	**Objections: 38**	**Comments: 52**

Key Issues Raised	
Support	A number of comments support the principle of delivering development on this large brownfield site, including from York Central Partners, York and North Yorkshire Chamber of Commerce, Historic England, the York, North Yorkshire and East Riding LEP, Make-it York, Holgate Liberal Democrats and Barratt and David Wilson Homes. Comments raised in support include that the site will enable the creation of a new Central Business District to replace Grade A office losses; that critical infrastructure must be developed alongside (and details made available for consultation); and to the principle of phasing brownfield sites ahead of Greenfield. York Central Partners request that the city centre boundary is widened to include York Central. Some of those writing in support of the scheme query whether the

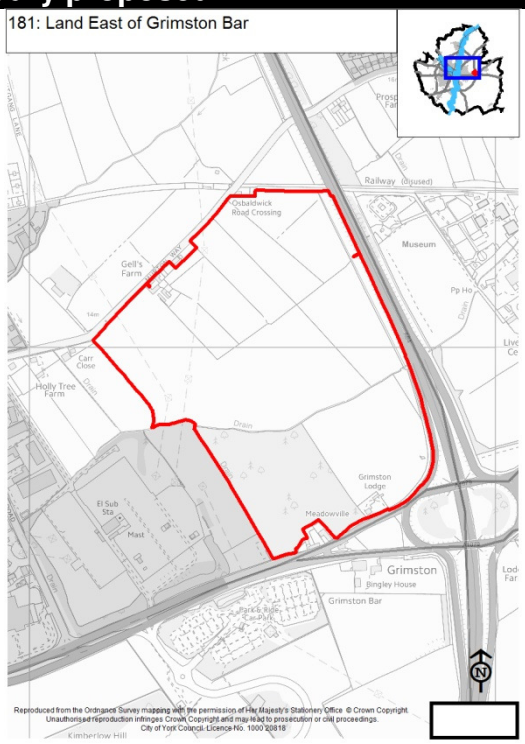
	access options proposed are the most appropriate solution, particularly in relation to the loss of Holgate community garden.
Objection	Although supportive of the principle of development on this brownfield site, Historic England remains unconvinced that the quantum of development proposed is deliverable in a manner that will safeguard the numerous heritage assets in its vicinity, and without harm to the historic core of York. The risk of a development strategy focused on tall buildings and its impact on the historic skyline is also raised by a number of other respondents, including Shepherd Group and Linden Homes. A number of objections query the site's assumed delivery, stating that there is considerable doubt about the viability and deliverability of the site and its lead-in time. The over-reliance on housing delivery from York Central could undermine the potential for the Plan to provide sufficient land to accommodate projected housing need over the Plan period. (Linden Homes and Miller Homes / Grimston Bar Development Group, Taylor Wimpey and Linden Homes / Barratt and David Wilson Homes / Taylor Wimpey / Joseph Rowntree Housing Trust / Linden Homes / Shepherd Group / Johnson Mowat). In addition, Linden Homes state that there is no developer interest and the site is not attractive due to high risk associated with its development. The cumulative impact of the site on the city's already congested road network is seen as a significant threat, and the lack of detail regarding sustainable transport options inadequate. Amongst others, Friends of Holgate Garden and St Pauls Primary School are particularly concerned that the prospective route for access to the York Central site crosses the community garden, citing the loss of productive and creative gardening and loss of amenity space. They note further significant impacts including from additional traffic/pollution on local resident's health and quality of life. Several objections, including from Labour Party (Holgate Ward) and St Pauls Primary School question the basic tenets underpinning the scheme – rather that the site should work for the public benefit, by delivering an appropriate housing mix/density and affordable quota. Further general issues raised regarding the lack of information presented to help people understand the scheme, specifically around transport access and sustainable transport options, housing mix and type, supporting services and amenities and how development could create a new place within an existing community.
Comment	The Environment Agency notes that the development offers an opportunity to de-culvert a section of Holgate Beck. A sequential approach to the layout of the site should be taken which locates the most vulnerable uses in the areas of least risk. No development at all should take place in flood zone 3b. In tandem with objections raised, some comments raise scepticism as to

	whether and when the site will be available for development – in view of the site's strategic importance to the Local Plan, if these fundamental questions cannot be answered there is a real threat that the Plan will fail the soundness test. (York and North Yorkshire Chamber of Commerce/Redrow Homes/Yorvik Homes). Specific issues include: lack of clarity on amount of available commercial/residential land - should additional land be provided elsewhere as a 'Plan B'?; what sort of mix/type of mix/type of housing is proposed, and will it meet York's needs, including an element of affordable; what supporting development is proposed (shops, green space, doctors etc).; impact of 'high rise' on historic character and setting of the city. York Green Party supports the requirement for supporting social infrastructure, and the principle of producing SPD to guide development, but believes ambitions for the scheme should be higher. York Central needs to be a zero carbon development, requiring excellent standards of sustainable building and design throughout, as well as very low car use – a model of sustainable design for the 21st Century. Amongst many others, Friends of Holgate Community Garden raise concerns that the prospective route for access to the York Central site crosses the community garden, citing the loss of productive and creative gardening and loss of amenity space. They note further significant impacts including from additional traffic/pollution on local resident's health and quality of life. Similar general issues raised regarding the lack of information presented to help people understand the scheme, specifically around transport access and sustainable transport options, housing mix and type, supporting services and amenities (including support to retain the Railway Institute as a community asset)and how development could create a new place within an existing community. Oakgate and Caddick Group comment on the overreliance on York Central for the city's future provision of land for B1a and that, due to deliverability challenges (access issues/compulsory purchase orders/lack of developer involvement) it could take at least 10 years before any office development is delivered.

ST5: General Area comments for Area 4			
Total representations: 9	**Support: 1 relevant**	**Objections: 1 relevant**	**Comments: 2 relevant**

Key Issues Raised	
Support	
Objection	The general public express concerns that development proposed has not been tested yet.
Comment	The general public express comments on the impact the increased number of houses in this area will have and that the Holgate area is already overpopulated.

ST6: Land north of Grimston Bar			
Total representations: 17	**Support: 3**	**Objections: 9**	**Comments: 6**
Key Issues Raised			
Support	A small number of responses support the general principle of development on the site. Amongst them, Grimston Bar Development Group, Taylor Wimpey and Linden Homes support the site's reallocation as a mixed-use development. Failing this, they request the site is removed from the green belt and identified as safeguarded land.		
Objection	Noting the potential impact of development on this open and visually prominent site, and the likely substantial traffic adding to congestion/air pollution, a number of respondents object to the site's allocation. (Heslington Parish Council / Fulford Parish Council / Cllr Mark Warters). Historic England recommend the site is deleted given the risk of serious harm to the special character and setting of York, which it would not be possible to mitigate.		
Comment	Murton Parish Council does not object to the development, but notes the need for continued dialogue: rep raises concerns over the potential impact of traffic on congestion/Hull Road residents, impact of flooding and visual impact of development on historic landscape. Before the proposals can be supported there would need to be a number of reassurances. Other comments received reflect these concerns.		
ST6: Alternative boundary proposed			



Grimston Bar Development Group, Taylor Wimpey and Linden Homes

Rep proposes alternative site boundary, returning to previously submitted boundary (ref 181). Following discussions with Planning and other technical Officers Taylor

Wimpey and Linden Homes submitted reps supporting development of the site as a comprehensive mised-use scheme. Preferred Sites consultation rejects a comprehensive mixed-use development and reverts to a proposed employment allocation at the southern corner of the site, adjacent to the A1079. Landowners remain willing to discuss the appropriate extent and mix of development in the context of the need for the Local Plan to provide more housing land, a greater range of small and medium sized housing sites and options for employment development to meet future as yet identified development needs. In the alternative, the site should be excluded from the green belt and identified as safeguarded land to provide flexibility in the longer term.

ST6: General Area comments for Area 4			
Total representations: 9	**Support:** 2 relevant	**Objections:** 1 relevant	**Comments: 2 relevant**
Key Issues Raised			
Support	Area 4: Welcome many of the proposals in the draft Local Plan which are directly related to the Parish in particular the buffer zones to protect the Parish's environment. (Murton Parish Council)		
Objection	The general public express concerns that development proposed has not been tested yet.		
Comment	The general public express comments on the impact the increased number of houses in this area will have on the city, the green belt and the historic setting of York.		

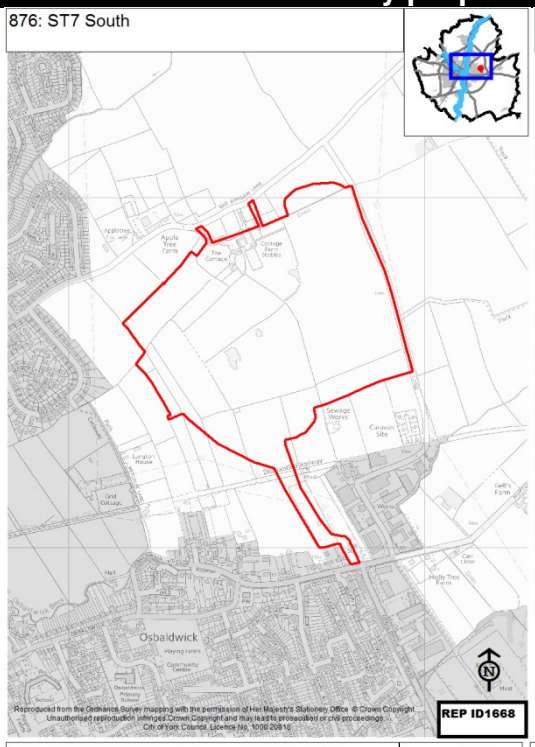
ST7: Land east of Metcalfe Lane			
Total representations: 37	**Support: 11**	**Objections: 19**	**Comments: 12**
Key Issues Raised			
Support	<u>General support for the principle of development/Garden Villages</u> A supportive response was received for the principle of development on this site, including from Persimmon Homes, Taylor Wimpey, Barratt and David Wilson Homes, TW Fields, and AAH Planning (obo a landowner). Note that each developer has submitted alternative boundaries to those proposed in the Preferred Sites plan – see below. Key issues raised include: • Support the principle of developing brownfield land; • Support the opportunities offered by developing a holistically planned settlement • Scale of development is more appropriate and would not be as impactful on established communities as pervious iteration.		
Objection	Persimmon Homes, Taylor Wimpey, Barratt and David Wilson Homes, TW Fields, and AAH Planning (obo a landowner) object to the site's proposed boundary on a number of grounds, including: • Site is undeliverable under current proposals – scale is too small to viably accommodate garden village scheme incorporating substantial community infrastructure;		

	• Artificial buffers, such as the green wedge, would make access to facilities more difficult and is contrary to established best practice. Site is now remote from the main urban area; Further objections disagree with the Council's conclusion that the site is suitable and deliverable for the scale of housing proposed – there is a risk that if this site is not delivered the Council will be unable to demonstrate a sufficient supply of deliverable housing land. Historic England notes some potential for development to the east of York and that the extent of this site is a big improvement on last draft. However they identify potential harm to the special character and setting of the historic city by removing the gap between the ring road and the edge of York, changing the relationship between York and its villages. Suggested amendment could mitigate against this, notably by moving the eastern edge away from ring road/limiting scale of development. Amongst others, Cllr Warters (Osbaldwick and Derwent Independent) points to the site's green belt status, and the need to protect open land from further encroachment. Further issues raised include that traffic on Hull Road makes residential development untenable; the site has drainage limitations; lack of local school space/other amenities; lack of natural/semi-natural open space. Transport and access issues are a common concern.
Comment	Heworth Without Parish Council welcomes the reduction in size of the proposed development, but suggests that it should be one of the last sites to be developed within the Plan period primarily due to the current infrastructure issues there are at present, most importantly access and the increase in traffic levels that such a development would have on Stockton Lane and Murton Way / Outgang Lane. They note the cumulative impact of traffic from other sites as a further concern. Cllr Ayre (Heworth Without Lib Dems) supports the reduction in size of this allocation and scale of development proposed and that the proposal would create a separate 'garden village', distinct from the existing urban area. Changes will help to protect key views to the Minster (fundamental to the setting of York) and support the proposal to protect the Millennium Way footpath linking York's historic strays with a 50m green buffer. Pleased that Heworth Without will be protected by a green wedge from Stockton Lane to Bad Bargain Lane to safeguard the character of the area. However, he comments that local residents continue to have significant concerns about the proposed development and opposed to the level of housing planned. Key challenges will be to ensure appropriate access routes are in place and local congestion is not made worse. Also a further challenge will be to ensure an appropriate level of services are provided with sufficient education and community provision. Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a spoke facility (specification given)

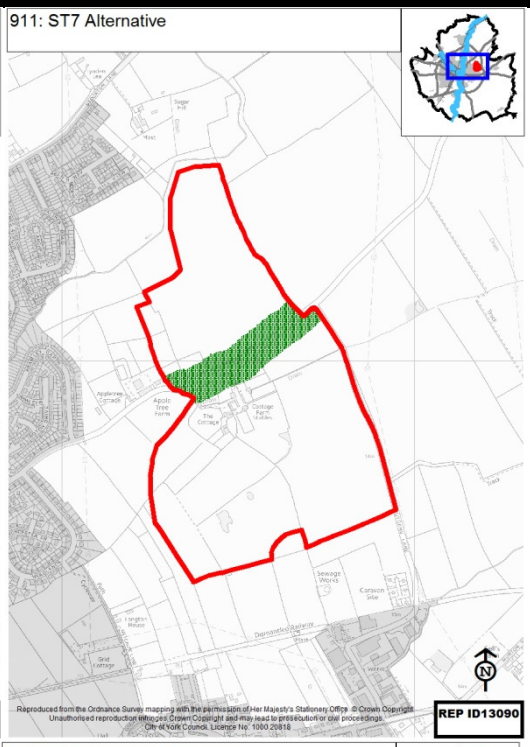
	General comments raise concern about the impact on local services/amenities supporting new development (incl natural habitats); impact of further traffic on existing congestion; lack of local employment, and; impact of development on open countryside/green belt and coalescence with Osbaldwick village. Where support is voiced, it is generally for the reduced scale of development

ST7: Alternative boundary proposed

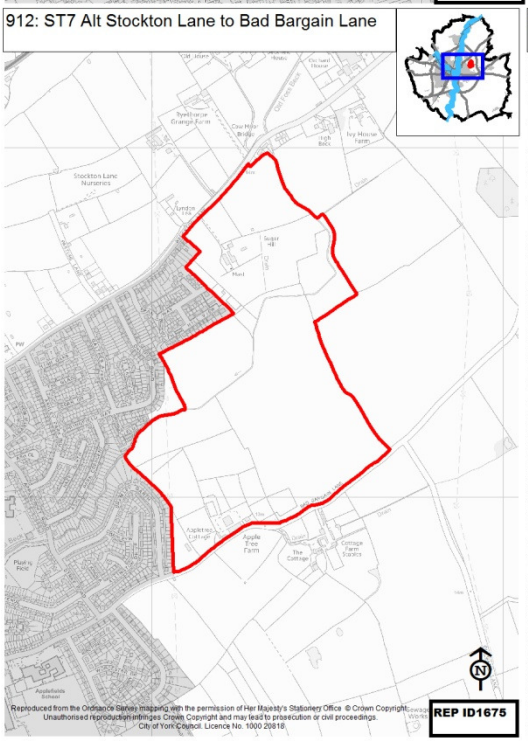
876: ST7 South



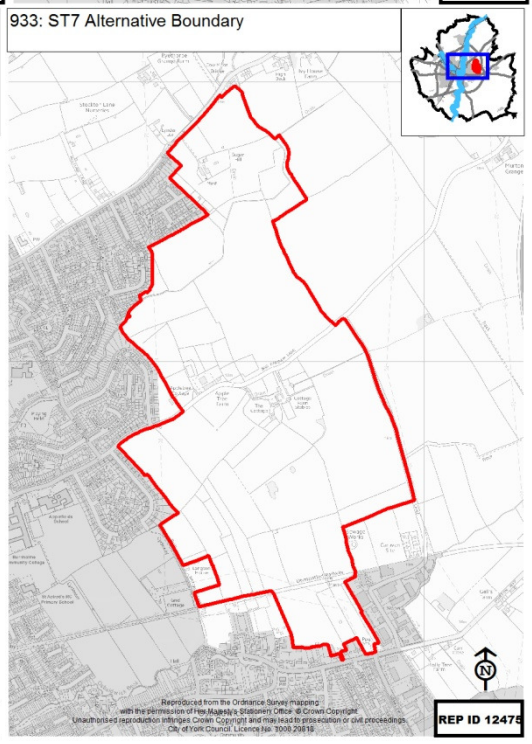
911: ST7 Alternative



912: ST7 Alt Stockton Lane to Bad Bargain Lane



933: ST7 Alternative Boundary



Barratt & David Wilson Homes

Propose alternative boundary to include additional land currently to the south of Bad Bargain Lane. Approx 41 ha. Suggested allocation could accommodate 784 dwellings with a density of circa 32 dph. Object to the land allocated as green wedge to west of ST7. Artificial buffers will make access to facilities more difficult and is against established good practice. Various elements of technical work has been undertaken which demonstrates that there are no constraints that would prevent the development of the site coming forward for residential development. It is anticipated that the suggested allocation could accommodate 784 dwellings with a density of circa 32 dwellings per hectare. The indicative layout includes land for the provision of a new primary school and playing fields, as well as a community hub, public open space, SUDS, pedestrian/cycle linkages together with areas of open space and landscaping. As noted within our overarching representations the objectively assessed need identified by the Council is insufficient and as such additional land will be required in order to meet the Cou ncil's housing needs. It is considered that the existing site boundary of proposed allocation ST7 should be expanded to include our Client's land interest to the south and west, to assist in meeting the shortfall in proposed allocations. Furthermore, the level of developable areas identified by the Council for proposed allocations, together with the proposed densities are not considered to be deliverable. When this is considered across the authority, this further exacerbates the shortfall in provision of housing allocations. The site is considered to be available for development now as all landowners have made the land available for development and there are no legal constraints that would prevent the site coming forward. The site is considered to be achievable for residential development and there is an excellent prospect that the site can be developed in the short term.

TW Fields

New boundary proposed. Evidence demonstrates that the allocation boundary needs to be expanded to deliver a minimum of 975 homes. This is in association with the delivery of a Sub-Urban Garden Village design philosophy and the provision of substantial community infrastructure. Importantly, the increase in land area would not have an impact on coalescence with the existing urban edge and surrounding settlements. The indicative master plan identifies the site's potential to: retain existing landscape features, achieve access to the site for pedestrians, cyclists and vehicles, providing easy access to public transport(including bus routes provided through the site) and services which exist within the locality, deliver sustainable drainage systems, provide 10.31ha of public open space distributed evenly throughout the site and provide ecological mitigation through the retention of the existing features and through compensatory provision for any los of the existing SINC within the site. Agree with CYC's conclusion that the site does not fulfil any of

the five Green Belt purposes. The site is located in a highly sustainable area adjacent to the City of York. There is an abundance of services and facilities located within walking and cycling distance to the site in the settlement areas of Osbaldwick, Burnholme, Heworth and Tang Hall. The representor envisages that a planning application will be submitted by Summer 2018, following the adoption of the Local Plan. Currently envisaged that first dwelling completions on the site will take place in 2019/20 following the submission of an outline planning application, subsequent reserved matters applications and initial site infrastructure works. The potential size of the site offers the opportunity for three builders to develop the scheme simultaneously. Therefore, it is anticipated that the development will deliver a yield of at least 90 homes per annum with the potential to deliver up to 120 homes per annum. The build out of 975 homes achieved in 2030/2031. The site is achievable for residential development now as there is a realistic prospect that the site can deliver new homes within the next 5 years and indeed within the first 5 years of the adoption of the Local Plan. The representor would like to work alongside CYC to formulate a site specific strategic development policy to be included within future versions of the Local Plan.

Taylor Wimpey

Proposed alternative boundary includes a site heavily influenced by the landscape and visual opportunities and constraints, and by the landscape strategy and recommendations as set out in the landscape and visual appraisal previously submitted by HS2 Landscape Partnership (January 2014). It was developed as part of an iterative process to minimise perceived loss of visual amenity or harm to existing landscape features and character, in order to maximise the opportunities provided by the site's landscape setting. The result is a development with the potential to fulfil a housing need in an area largely previously identified in the councils Preferred Option Plan, but which has improved access, does not impinge on the setting of any Conservation Areas and which provides significant planning gain in terms of improved public access, strong green infrastructure and the creation of a new purpose designed, defensible Green Belt. This ST7 alternative has the potential to make a better connection to Stockton Lane making better use of public transport links to the City Centre. This ST7 proposal has the ability to deliver a viable “garden city” sustainable urban extension which provides for circa 750 dwellings.

Persimmon Homes

New boundary proposed - rep supports the principle of development in this location but objects to the undeliverable boundary. Instead, it states that the boundary in the 'halted' (publication ref 933) local plan be reintroduced and allocated for residential development. In view of the exhaustive discussions about vehicular access in the

recent past it was with considerable surprise that the LPPS reverted to allocating a site without sufficient vehicular access. Unless the allocation is extended to Stockton Lane in the north and an adopted road in the south the allocation cannot be included in assessment as delivering new houses.

AAH Planning obo landowner

New boundary proposed, removing green wedge (it states that the boundary in the 'halted' (publication ref 933) local plan be reintroduced and allocated for residential development). Proposal suggests scheme will aim to deliver upwards of 15% of trips to be undertaken using public transport - this appears to be a low target. A natural expansion of settlement would not have same issues with closer connection to existing services and facilities. Current proposals create an island divorced from the settlement with no real link and the green wedge will serve no real purpose. NPPF provides guidance on local green spaces and these may be designated anywhere where the space is demonstrably special to the local community - this has not been demonstrated. It would be recommended that the proposals be amended to remove the green wedge and underlying green belt and instead propose a true expansion of the settlement.

ST7: General Area comments for Area 4			
Total representations: 9	**Support: 2 relevant**	**Objections: 1 relevant**	**Comments: 2 relevant**

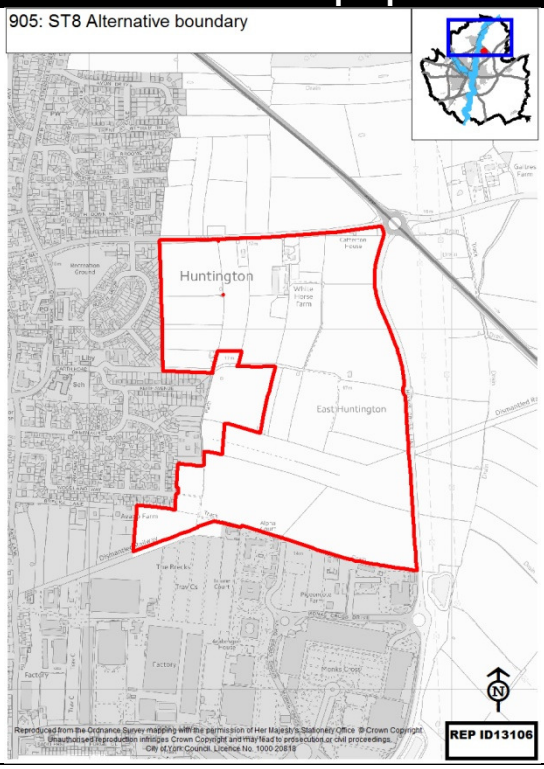
Key Issues Raised	
Support	Area 4: Welcome many of the proposals in the draft Local Plan which are directly related to the Parish in particular the buffer zones to protect the Parish's environment. (Murton Parish Council)
Objection	General concerns that development proposed has not been tested yet.
Comment	General comments on the impact the increased number of houses in this area will have on the city, the green belt and the historic setting of York.

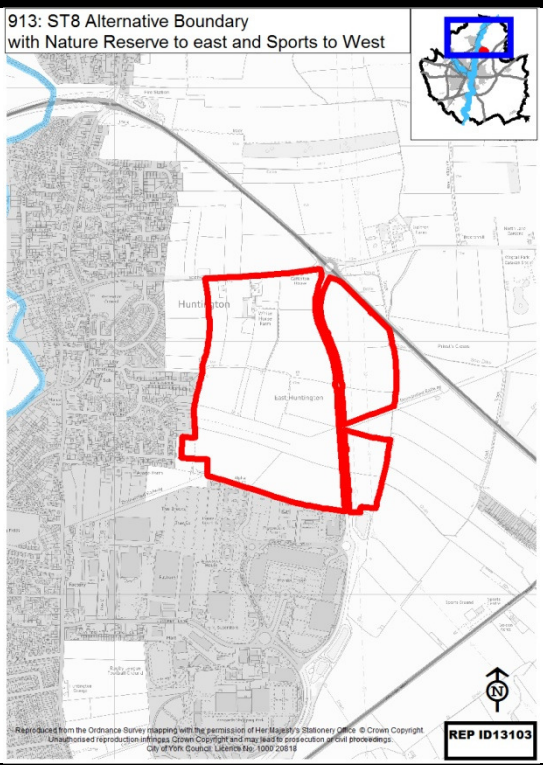
ST8: Land north of Monks Cross			
Total representations: 53	**Support: 11**	**Objections: 33 (including objection to boundary proposed)**	**Comments: 15**

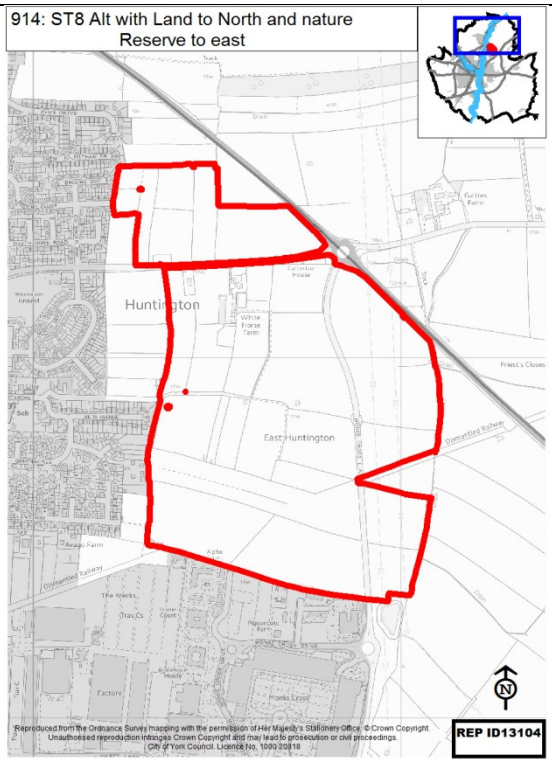
Key Issues Raised	
Support	A small number of comments support the principle of development on this site, including from Strensall with Towthorpe Parish Council, Barratt and David Wilson Homes, Redrow Homes and GM Ward Trustees, Redrow Homes and Linden Homes and Huntington and New Earswick Liberal Democrat Cllrs (Councillors Runciman, Cullwick and Orrell). Note that even amongst those writing in support of development, the impact of additional traffic on the ORR/local routes is a concern. Response confirms that the site is deliverable with a national

	housebuilder onboard. Note that Redrow Homes and GM Ward Trustees propose externalising open space to the east of the site (site ref 913).
Objection	Objectors to housing development on this site comment on the common themes of traffic congestion (noting the impact of the proposed stadium and Vangarde developments); inadequacy of public transport; limited amenities and services. Amongst other respondents, Huntington and New Earswick Liberal Democrat Councillors object to the scale of development proposed in the Huntington area, noting the existing impact of significant recent developments on traffic, drainage and future flood risk. Historic England states that, without mitigation, development would harm several elements which contribute to the special character and setting of the City, namely its rural setting and green wedges (in this case, Monk Stray). Suggested mitigation is to pull development away from the northern ring road and Monks Cross Link Road. The detrimental impact of development on green belt character is also noted by several other respondents.
Comment	In general, comments reflect the concerns raised above, namely that while noting that housing needs to go somewhere, the infrastructure necessary to accommodate growth must be put in place before development takes place. This particularly relates to alleviating congestion on the ORR (Wigginton Parish Council/Julian Sturdy MP) Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a spoke facility (specification given)

ST8: New boundaries proposed







Johnson Mowatt [redacted]

Alternative boundary requested. Support ST8 in principle but object to the exclusion of land to the west between the allocation and Huntington. Consider that the approach to separate an urban extension with such a large buffer is not an appropriate plan-led approach. Do not believe that this is justified by council reasoning. It would be more appropriate to reduce the buffer in order to make more efficient use of land. Consider that this buffer would not fulfil green belt purposes.

Redrow Homes and Linden Homes

Alternative boundary proposed, reintroducing land to the north of North Lane (8.55ha delivering circa 250 homes), increasing overall and annual rates of delivery (site ref 914). Comment objects to the principle of separating urban extensions from the existing urban area. The re-instatement of land north of North Lane will align with existing built development to the west and the strategic site can be appropriately contained by the A1237. Similar to the required considerations of the proposed ST8 site, a landscape buffer could be incorporated between the edge of the proposed extension and the A1237. Access to the land north of North Lane would be from North Lane, with no new direct access to the A1237. This aligns with one of the planning principles of the proposed ST8.

General issues raised in relation to Area 6/North of Outer Ring Road			
Total representations: 71	**Support: n/a**	**Objections: n/a**	**Comments: 2**

Key Issues Raised	
Support	n/a
Objection	n/a
Comment	Comments in general can be attributed specifically to the ST8 site, but a couple of general comments are relevant. While Huntington and New

	Earswick Liberal Democrat Councillors appreciate that CYC Officers are required to devise a Local Plan that meets with legislation, they note the unsustainable pressure placed on this part of the City by recent levels of development (Vangarde, Huntington Stadium and two housing developments). Recent floods have highlighted the drainage problems in this area with water levels never being higher in living memory. The Environment Agency has said attention will have to be paid to the whole of the Foss Basin not just adequacy of the Barrier. All recent developments have added water to the river system and take away land that acts as water storage. It is not equitable to Huntington residents who have suffered considerable development or sensible in terms of future flooding risk that there be further major house building or other development in Huntington and New Earswick area.

ST9: Land North of Haxby			
Total representations: 536	**Support: 17**	**Objections: 454**	**Comments: 69**
Key Issues Raised			
Support	A small supportive response was received for development on the site, including from the Diocese of West Yorkshire and the Dales and Linden Homes and Barratt and David Wilson Homes, who confirm that the estimated development capacity can be delivered in the Plan period. Strensall and Towthorpe Parish Council recognise that the package of sites identified in Area 6 represent the views of the residents of the Parish. Where support was recorded, in general there is reference made to the potential for development to benefit the town, whether through providing affordable housing, additional amenities or improving supporting infrastructure (road and rail).		
Objection	Significant level of objection received in response to proposed development at ST9 (including from (Haxby Town Council, Skelton P.C, Haxby and Wigginton Neighbourhood Planning Group, (Cllr Cuthbertson/Haxby and Wigginton Liberal Democrats).) . Key issues raised include: <u>Transport and road safety:</u> • Site has no access to York/Leeds except by road through Haxby and Wigginton. Development would exacerbate local congestion, which is already significant. Particular concerns around impact on Moor Lane and Usher Lane, which are seen as incapable of absorbing additional traffic. “Additional housing will increase significantly the volume of traffic on Usher Lane. Road is narrow and becomes congested towards junction with Station Road and safe speed limits are exceeded. Road calming measures must be imposed and improvements to junction of Station Road/Usher Lane for safety of pedestrians who frequently cross here to access school and shops”. • Issues with northern ring road (A1237/A64) and Haxby/Strensall		

roundabout would be compounded by further development north of Haxby. A number of comments refer to the need to dual the outer ring road prior to any further development taking place.

- Concern that existing bus provision is already unsatisfactory and could not provide for additional residents.
- Reopening Haxby station – while many support the idea of providing a station at Haxby, many question that funding will be available to enable it.

<u>Inappropriate/inadequate access to the site</u>

<u>Green Belt:</u>

- Site is located in the Green Belt – development of housing is an inappropriate use.

<u>Drainage and sewerage:</u>

- Potential for flooding caused by development on a green field site. A common concern relates to inadequate drainage and sewerage - "New drainage would need to be installed before any development took place; Sewerage system is totally inadequate in the village. The WTP at Strensall is at or above capacity. Suggest that it would not be possible to connect to the current public sewer network, but a separate discharge route would be required for any development site to be enhanced or a new facility provided"; further, that " currently surface water flooding regularly causes the sewers to back up in heavy rain. The whole SE corner of the site is flagged up as a flood risk on the Environment Agency website. When the fields flood, it takes a long time to clear."
- sewerage and drainage - development must not progress before new provision is installed and in full working order. Under no circumstances must new property connect up to the existing sewer and drainage system;

<u>Local facilities and amenities</u>

Many comments point to the need for development to be self sufficient in amenities/services, including provision of a primary and secondary school. Issues include:

- Lack of parking in the town centre
- Lack of school space (noting the demolition of Oaken Grove)
- Healthcare – reference to appointment waiting time of 2 weeks
- Lack of green/open space
- Employment – none provided through development of the site and little local employment. Likely that new residents would commute to York and beyond.

<u>Overdevelopment in Haxby – impact on the character of the place and community spirit</u>

- Haxby and Wigginton have been subject to massive incremental

and piecemeal growth over a number of years with no planning of the infrastructure and other facilities are already inadequate and badly designed. “A rise of over 20% in the number of houses is unsupportable. Unless infrastructure improvements are made before additional housing, the Plan would be totally unacceptable.”

- The number of houses indicated for this phase is too large for the community, retail and business facilities in the centre of Haxby. If additional development at all is to be undertaken, it should cover a smaller area and include a much smaller number of houses
- Specific protections which will retain community character/protect natural and green space, must be written into the masterplan/neighbourhood plan. (Haxby and Wigginton Neighbourhood Planning Group)

<u>Impact on environment</u>

- loss of ridge and furrow on the land and possible roman remains
- loss of grade 3a agricultural land

<u>Conflict with SA objectives</u>

- Typically, comments query the SA’s statement that the site has access to services and transport routes. “The Sustainability Appraisal is totally wrong not to have column 2 as at best dark yellow for ST9 and red for all other sites in Haxby. This would especially be the case with air quality, as this will deteriorate with the thousands of extra cars in Haxby. The statement that the site has access to services and transport routes is wrong. Currently services are not available in the village, similarly health provision is not currently available.”; “ The proposal is on Greenfield, so it does not meet SA objectives 8, 9, 10, 14 or 15.”

Typical representative objections:
“Haxby has already been overdeveloped, access, infrastructure, parking, sewerage, capacity at health centre, schools are all problems now. Any new development should be on a completely new site away from suburbs with its own new roads, sewers, shops, schools, and medical centre. Properties on Usher Lane already have high levels of standing water, whilst properties on Towthorpe Road had gardens and garages flooded on Boxing Day. Off West Nooks water table is so high water stands in many places during winter. There are only 3 roads connecting Haxby and the planned new development (A64, A1237, And York Road) - none can take more traffic. They come to a standstill and result in poor air quality and increased dangers to cyclists and pedestrians. Dualling of the A1237 and A64 has been promised for decades - no new development should take place until this has happened. A new station is unlikely, and new timetables will mean level crossings will be closed more frequently. Junctions in Haxby are already a problem (Usher Lane and Station Road). Access roads to and from the new development would feed into Usher Lane and Moor lane both country lanes with increased traffic levels and increasing speeds.”

	"This would be an unacceptable impact on Haxby. Access onto Usher lane/Station Road junction would impact on existing capacity and highlight safety issues. Development would destroy valuable Grade 3a agricultural land and key views. This intrusion into open countryside would represent urban sprawl into a Greenfield/green belt site. Haxby is already over developed and will reduce the green corridor along Usher Lane and Moor lane. Access to local services is already inadequate. Existing drainage. sewerage and flooding issues in Haxby are already serious. There is limited capacity at local primary and secondary schools. Green space should be provided on Moor Lane and Usher lane if development is to be visually acceptable. Haxby suffers traffic congestion already any addition to this may change character of main routes into the village. Air quality from traffic affecting residents and school children should be considered. The A1237 is gridlocked at times an additional 735 dwellings will add to pressures. No explanation is provided on how the ring road will be improved and funding obtained. Schools, shops and medical services will be over burdened. The site is crossed by power lines and the public foul sewer network does not have adequate capacity. Rural development should be less than 30 dpha. This site is in the green belt and mature trees and hedgerows are likely to be removed to allow development."
Comment	Common comments include that, whilst not objecting to the principle of development and the need for additional homes (including affordable homes), necessary infrastructure must be provided before development commences and a number of further issues addressed, namely relating to school spaces; housing mix and type; upgrades to transport infrastructure (strategic network and local roads); public transport; congestion and parking; pedestrian safety; sewerage and drainage; employment, training and development; retail facilities; environmental issues; impact of construction on existing residents and businesses. Further, this should be set out in the emerging Plan. Transport and traffic is a specific concern especially on the following routes: junctions at Moor Lane in Wigginton, Haxby Moor Road at New Bridge/ West End, Wigginton Roundabout at the B1363/ A1237 junction, Usher Lane, Station Road, York Road, The village roundabout junction, Moor Lane The Village junction, B1363, A1237 Haxby and New Earswick roundabout, the A1237 Wigginton Roundabout and Towthorpe Road. (Wigginton Parish Council. Julian Sturdy MP, Haxby and Wigginton Neighbourhood Planning Group/Cllr Cuthbertson, Haxby and Wigginton Liberal Democrats) The Yorkshire Ambulance Service requests that specific text is included within the allocation to make provision for a spoke facility (specification given). Queries raised re probability of effective road infrastructure being funded (Skelton P.C.) Note: cemetery is shown incorrectly – plan should be redrawn to

	include proposed extension.

General issues raised in relation to Area 6/North of Outer Ring Road			
Total representations: 71	**Support: 2 relevant to Haxby area**	**Objections: 36**	**Comments: 27**

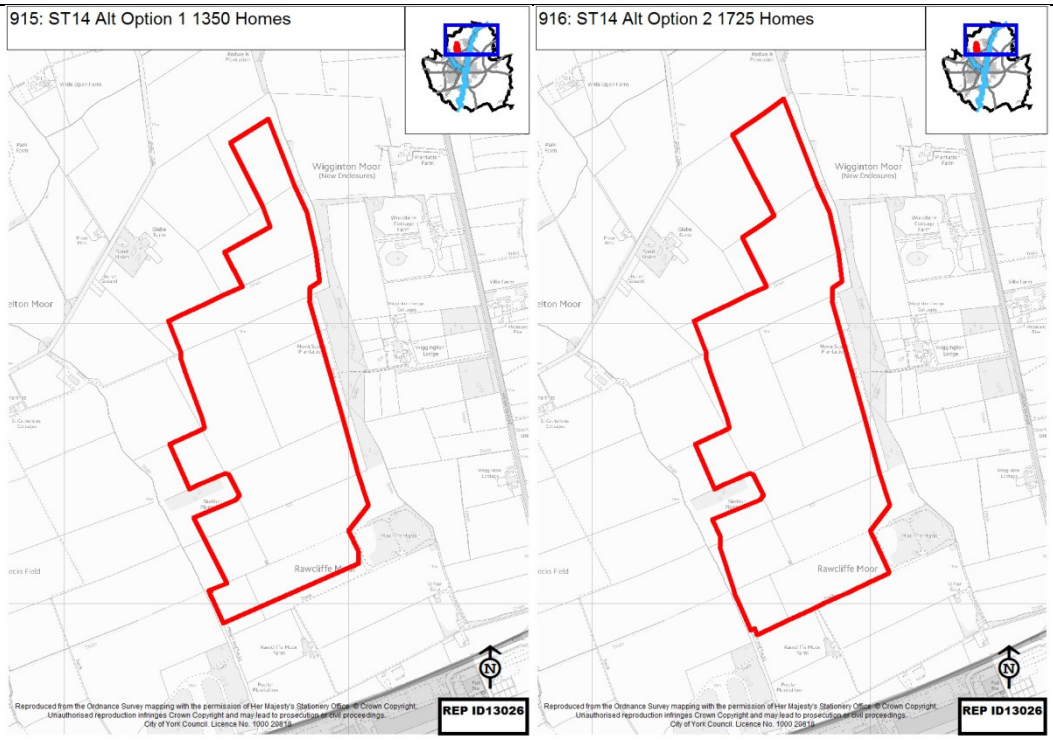
Key Issues Raised	
Support	General support for reduced housing numbers in Haxby area.
Objection	Those commenting on the principle of development north of the ring road/Haxby/Wigginton typically mirror the concerns attributed to ST9 itself, namely the likely increase to existing local traffic congestion, air and noise pollution, lack of local amenities, drainage/sewerage under capacity, lack of employment in York for new residents, and congestion on A64 and A1237. A common statement is that the area is already overdeveloped and no new homes should be built in the area until the outer ring road is dualled and an additional access road built (Haxby and Wigginton Neighbourhood Plan Steering Group).
Comment	Those commenting on the principle of development north of the ring road/Haxby/Wigginton typically mirror the comments attributed to ST9 itself. General support for the principle of housing development but concern that the likely impacts on local infrastructure, amenities and services should be mitigated against (Haxby Town Council/Wigginton Parish Council, Julian Sturdy MP, Cllr Cuthbertson as ward councillor, Haxby and Wigginton Liberal Democrats). Skelton Village Trust note that major sections of the ORR cannot cope with existing traffic flows. Problems include access restrictions experienced by emergency services. Providing adequate road capacity for forecast future demand is essential to allow for future housing growth.

ST14: Land west of Wigginton Road			
Total representations: 113	**Support: 20**	**Objections: 72**	**Comments: 27**

Key Issues Raised	
Support	Amongst a number of other respondents, Strensall with Towthorpe Parish Council, Clifton Without Parish Council, Haxby and Wigginton Neighbourhood Plan Steering Group give conditional support to the principle of development in this location, stating the following conditions: • Dualling of the A1237 should precede any development (Clifton Without PC); • Development should precede H54 and ST9, given the infrastructure involved (H+W NPSG); • Site should be expanded to incorporate more housing/conversely that smaller site size is more realistic; • As a stand alone village in its own right it should provide for its own services and facilities and appropriate infrastructure; Historic England recommends that there is considerable merit in continuing to explore the potential offered by this new settlement - the

	degree of harm caused to York's special character and setting could be much less than that caused were a similar scale of development located on the edge of the built up area of York, or within existing surrounding villages. Note objection below. Barratt Homes, David Wilson Homes and TW Fields fully support the principle of the proposed allocation, and of delivering a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and open space (incl recreational facilities). Site is suitable and in a highly sustainable, unconstrained location. The site is available now and is in the control of a national housebuilder and regional development company who are actively seeking to secure planning permission. The site can be considered achievable as homes can be delivered on the site during the next 5 years, and indeed within the first 5 years of the Plan. Note suggested boundary changes as per the below.
Objection	Significant level of objection received in response to proposed development at ST14, including from Haxby Town Council, Rawcliffe Parish Council, Skelton Parish Council, Historic England, York Green Party, CPRE, Julian Sturdy MP, Skelton Village Trust, Airedon Planning and Design and JJ Gallagher Ltd. Key issues raised include: • Impact of the scale of development proposed on the green belt/landscape/ and agricultural land. Historic England states that an incursion of this size in the open countryside around the historic city is likely to harm the special character and setting of York. At this stage it has not yet been made clear what impact the infrastructure necessary to facilitate this development may have on the elements which contribute to the special character and setting of the City - without this, this allocation has the potential to result in serious harm; • Site's capacity is not of sufficient scale to provide a range of facilities and services required for a stand-alone settlement; • Highways (and associated air quality) impacts will be significant, particularly onto the already congested ring road. Rural roads are already affected - Skelton and settlements to the east already experience traffic seeking to avoid congested ring road in places these roads are too narrow to cope. Developments will exacerbate this problem. Note the cumulative impact of other development; • Extensive infrastructure requirements are unlikely to be deliverable in the suggested timescale; • Potential drainage/flooding problems. JJ Gallagher Ltd considers that development could set an unwelcome precedent and result in unrestricted sprawl into the Green Belt, noting that the site's development conflicts with three of five key purposes of green Belt. Disagree with the Council's conclusion that the site is suitable and deliverable for the scale of housing proposed in York. The approach that the Council has adopted of seeking to preserve the

	setting and character of York lacks transparency and is at the expense of the other purposes of Green Belt. There is a risk that if this site is not delivered the Council will be unable to demonstrate a sufficient supply of deliverable housing land. The evidential basis to justify the selection of the site through the emerging Local Plan has not been provided by the Council.
Comment	Those who do not object to the site's inclusion raise a number of similar concerns to those noted above, principally that development must be self sufficient in providing services/amenities; impact of pressure on the ring road/other parts of the highway network and how this would be alleviated – need for a masterplan to demonstrate how the impact of additional traffic can be managed, particularly at peak times; development should precede ST9 and H54 given necessary investment in infrastructure; need for further archaeological investigation; potential flooding/drainage issues; (including from Wigginton Parish Council, Haxby and Wigginton Lib Dems, Cllr Ian Cuthbertson (Haxby and Wigginton Cllr). Linden Homes and Miller Homes query the Council's green belt assessment, and the conclusion that ST14 is likely to cause less harm than ST30. Linden Homes, Persimmon Homes and Taylor Wimpey consider that infrastructure for site delivery is likely to be long, complex and costly. Not of sufficient size to deliver required social and physical infrastructure. Site could only provide new homes at end of plan period due to long lead-in times. No certainty over delivery rates due to complexities of site including land ownership, viability and developer interest.
ST14: Alternative boundary proposed	



Barratt Homes, David Wilson Homes and TW Fields

New boundary proposed (1). 65.36ha delivering a minimum of 1,350 homes at the site and ensuring CYCs Planning Principles are delivered (site 915). Site is suitable and in a highly sustainable, unconstrained location. The site is available now and is in the control of a national housebuilder and regional development company who are actively seeking to secure planning permission. The site can be considered achievable as homes can be delivered on the site during the next 5 years, and indeed within the first 5 years of the Plan.

Barratt Homes, David Wilson Homes and TW Fields

New boundary proposed (2). 72.73ha delivering 1,725 homes with proportionate enhancement of Planning Principles (site 916). Site can provide additional capacity to accommodate CYC's annual housing requirement should it increase. Reduced southern boundary to Clifton Moor (413m). Reduced open space within the site - notes substantial areas of open space on the site's western boundary. Note that technical review of SHMA suggests that there is a compelling case for the release of additional land as housing allocations in oreder to meet the City's full OAHN, such as through the proposed amended boundary. Site is suitable and in a highly sustainable, unconstrained location. The site is available now and is in the control of a national housebuilder and regional development company who are actively seeking to secure planning permission. The site can be considered achievable as homes can be delivered on the site during the next 5 years, and indeed within the first 5 years of the Plan.

General issues raised in relation to Area 6/North of Outer Ring Road			
Total representations: 71	**Support: 1 relevant**	**Objections: 36**	**Comments: 27**
Key Issues Raised			
Support	General support for proposed sites in Area 6		
Objection	Those commenting on the principle of development north of the ring road/Haxby/Wigginton typically mirror the concerns attributed to ST9 itself, namely the likely increase to existing local traffic congestion, air and noise pollution, lack of local amenities, drainage/sewerage under capacity, lack of employment in York for new residents, and congestion on A64 and A1237. A common statement is that the area is already overdeveloped and no new homes should be built in the area until the outer ring road is dualled and an additional access road built (Haxby and Wigginton Neighbourhood Plan Steering Group).		
Comment	Those commenting on the principle of development north of the ring road/Haxby/Wigginton typically mirror the comments attributed to ST9 itself. General support for the principle of housing development but concern that the likely impacts on local infrastructure, amenities and services should be mitigated against (Haxby Town Council/Wigginton Parish Council, Julian Sturdy MP, Cllr Cuthbertson as ward councillor, Haxby and Wigginton Liberal Democrats). Skelton Village Trust note that major sections of the ORR cannot cope with existing traffic flows. Problems include access restrictions experienced by emergency services. Providing adequate road capacity for forecast future demand is essential to allow for future housing growth. One comment considers ST14 as the preferred development option for growth north of York.		

ST15: Land west of Elvington Lane			
Total representatives commenting on ST15: 167	**Support: 33**	**Objections: 103** (includes 2no. duplicate objections which refer to the SA as well as Preferred Sites doc)	**Comments: 42**
Key Issues Raised			
Support	<u>General support for the principle of development/Garden Villages</u> A supportive response was received for the principle of development on this site, including from Historic England, CPRE, Julian Sturdy MP, Barratt and David Wilson Homes, University of York, [redacted], York Action Group Alliance, Sandby (York) Ltd and Oakgate/ Caddick Group. Key issues raised include: • Support the principle of developing brownfield land; • Support the opportunities offered by developing a holistically planned settlement • A strategy in which part of York's development needs are met in new freestanding settlements beyond the ring road might help to		

	safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built-up area of York to its surrounding settlements. (Historic England) Enhancing the natural environment Potential transport/highway improvements • The University of York appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15 - greatly advantageous to business users and relieving congestion on the Grimston Bar junction. Discussions have been held between the developers of ST15 to explore the opportunities of linking the University campus with this development, creating a sustainable community and an ideal location for staff to live with easy non-car access (O'Neill Associates obo University of York). Note queries re cost of delivering access A number of members of the public support the allocation, on the grounds that it will help meet the development needs of the City, reduce development pressures on other parts of the City, provide a 'garden suburb new village' south of York, support the change to move the site away from the A64, by adding a new junction onto the A64 it would reduce congestion at Grimston Bar, avoid floodplain areas, reduce the size of the site, less obtrusive location, could absorb the housing numbers proposed in site ST33, but also note that the infrastructure requirements, services (eg. Roads, sewers etc) and facilities and the impact on Heslington Tillmire (inc buffer) would need careful consideration.
Objection	Significant level of objection received in response to proposed development at ST15, including from Yorkshire Wildlife Trust, Heslington Village Trust, Heslington Parish Council, Elvington Parish Council, Fulford Parish Council, Cllr Warters, Historic England (in relation to absence of information confirming development would safeguard those elements which make York such a special place), Shepherd Group Properties Ltd, Shepherd Homes, RSPB, Taylor Wimpey, York Ornithological Club, Miller Homes, Linden Homes, Persimmon Homes and Taylor Wimpey, JJ Gallagher Ltd, Joseph Rowntree Housing Trust, Johnson Mowat, Avant Homes, KCS Developments, Redrow Homes and Linden Homes, [redacted]. Key issues raised include: Development in green belt/open countryside • The development of this strategic site conflicts with three of the five key purposes of Green Belt, namely to: check the unrestricted sprawl of large built-up areas; assist in safeguarding the

countryside from encroachment; and preserve the setting and character of historic towns.

- Development would have an urbanising effect on the open countryside.

Impact on the natural environment

- The previous HEA appears to be excluded from the allocation, with no alternative marked. No information is provided to indicate that any work has been undertaken on the recreation strategy. Further, the inclusion of a large part of Elvington Airfield, including parts of the SINC, without assessment of either direct or indirect impacts of the housing allocation, is concerning, particularly in light of the Council's own previously negative assessment of allocation here. If ST15 is allocated in advance of the HEA, the recreation strategy and all other mitigation measures being secured through policy there is a high risk of the allocation being found unsound (RSPB).

- Objecting to ST15 Land to the West of Elvington Lane due to, proximity to the impact zone for Lower Derwent Valley Special Protection Area (Flooding and Birds), closeness to the SSSI the Heslington Tilmire, lack of a habitat enhancement area, fragmentation of the Ouse and Lower Derwent Valley and loss of habitats (birds), being within a site of importance for nature conservation, disruption to bird breeding, proximity to A64 deterrent to cyclists, complexity of long term management with multiple landowners, habitat enhancement areas will be difficult to ensure and lack of a master plan. The original habitat enhancement area should remain with buffer areas, a long term management plan is needed, researched access, a recreation plan and a master plan. (Yorkshire Wildlife Trust)

- Object to the site because to now include a significant part of the Elvington Airfield site (Site 607) having previously rejected it because of the ecological impact is illogical and inconsistent. No change in circumstances is listed which would explain this choice of a previously rejected site. The site does not avoid impacts on Heslington Tillmire, which is a Site of Special Scientific Interest - the highest national level of environmental protection. The Tillmire is 6km from the River Derwent and the YWT reserve of Wheldrake Ings. It is very likely that birds, particularly waders, will move frequently between the area of the Tillmire where they breed and the Lower Derwent Valley (LDV) for feeding. Much of the L DV is under EU legislation designated a Special Protection Area (SPA) which provides a higher level of protection not only on the SPA but on adjacent areas like the Tillmire. If ST15 remains in the Local Plan any development must be consistent with the following principles: 1. A full objective assessment of the Tillmire for devising measures which will protect and isolate it from any damaging impact from development. Such measures must be

	implemented before any further development takes place and be fuly funded by landowners/developers; 2. a buffer zone in excess of £500m needs to be established to minimise any form of disturbance or impact on the two SSSIs; 3. the lack of inclusion of a Habitat Enhancement Area (HEA) in the allocation is a retrograde step form the 2014 Local Plan which provided grater certainty that a buffer zone and HEA would be provided; 4. funding needs to be provided by landowners/developers in perpetuity to ensure the ongoing proper management of buffer zones (York Ornithological Club). <u>Traffic and Access</u> • Whilst the Trust supports some of the changes made by CYC since last consultation, there are still concerns over traffic and access through Heslington, site location and Tilmire SSSI, historic views, viability of development which may lead to expansion of site or increase in density (Heslington Village Trust). • The need for new access to the A64 could render the scheme unviable. • Site is remote from public transport access • Note the wider impact of traffic generated/displaced by this development. • Concern around use of Elvington Lane for any form of access to the site. <u>Lack of important detail –</u> note also comments under 'Impact on the natural environment' above • Concern about lack of detail on impact to local area on infrastructure, especially transport links to A64 and B1228. The effects on local countryside could be vast. • Historic setting - The approach that the Council has adopted of seeking to preserve the setting and character of York lacks transparency and is at the expense of the other purposes of Green Belt. There is a risk that if this site is not delivered the Council will be unable to demonstrate a sufficient supply of deliverable housing land. The evidential basis to justify the selection of the site through the emerging Local Plan has not been provided by the Council • Welcome reduction in size and the fact that it is now partly brownfield. However, consider that for development of this scale, there are too many unknown issues including lack of information on biodiversity mitigation, traffic infrastructure and landscape strategy (Heslington PC). • Allocation has improved since last LP draft - it is reduced in size and located further from A64. A stand alone settlement is likely to cause less harm on the setting on York than an extension on the urban edge. However, it is by no means clear what impact the infrastructure necessary to deliver this new settlement will have upon York's special character and setting. As we made clear in

	our response to the last consultation, this aspect is of paramount importance. The Plan will need to demonstrate that this area can deliver the scale of growth anticipated in a manner commensurate with safeguarding those elements which make York such a special place. In the absence of this information, this allocation has potential to result in serious harm to SA Objective 14. (Historic England). • Site has not yet been subject to full Sustainability Appraisal. <u>Delivery issues/other infrastructure</u> • No certainty over delivery rates due to complexities of site including land ownership, viability and developer interest. • Not of sufficient size to deliver required social and physical infrastructure. • Site could only provide new homes at end of plan period due to long lead-in times. • Site scores negatively in interim SA. • Doubts about site's viability and deliverability, particularly because of infrastructure requirements – "Best case scenario is that an application will be prepared and submitted on receipt of the Inspectors Report and applied a 5 year lead in period to allow for the promoters to identify a developer, the determination of the planning application, S106, reserved matters approval contractual negotiations and significant infrastructure delivery. ST34 is unlikely to deliver more than 835 dwellings in the plan period a shortfall of 775 when compared to that predicted in the Local Plan" (Linden Homes). <u>Availability of alternatives</u> • Smaller more sustainable sites are situated on the edge of the existing settlement that could deliver housing promptly and sustainably and thereby boost housing supply in accordance with national policy. • A wide range of sites should be considered rather than CYC putting all of its eggs in one basket. Elvington Parish Council comment that splitting the airfield runway would be absurd on historical reasons, strategic need, recreational use and tourism which is an economic strategic priority for York. If built ST15 should be further north and west. The A64 separates the site from Heslington and as proposed is too close to Elvington and Wheldrake and would dominate the area. Underground fuel pipelines at the airfield could lead to a contamination issue (Elvington PC)

	A number of members of the public object to the allocation on the grounds th it is totally unsuitable for housing, is in an unsustainable location, too large (smaller size than original but more houses indicates potential house cramming), too much reliance on the site providing housing for the City, no need for a garden village, overall the development is not necessary, loss of Green Belt, impact on historic character of York / rural character, loss of agricultural land, development is disproportionate to surrounding area / villag ST15 and expansion of industrial estates near the airfield would result in urb sprawl, needs relocating closer to the A64 so it doesn't impinge on the Airfiel and Elvington & Wheldrake, traffic congestion, loss of wildlife / impact on SS Tillmire, impact on Wheldrake Woods, impact on surrounding villages, unsustainable location, loss of runway / airfield (strategic asset), impact on tourism, impact on Air Museum and users of airfield, lack of infrastructure, damage to cultural heritage, much of the site is in Flood Zone 2, over development, lack of employment facilities, pollution, loss of footpaths / cycle tracks, drainage problems, question how the site will be serviced, contamination from airfield use (under ground fuel pipes), concern over poss pedestrian / cycle access along Long Lane / Common Lane, traffic access vi Heslington must be avoided at all costs, no large developments should take place outside the Ring Road, lack of schools, doctors surgeries etc, development will be the size of Pocklington and will need comparable infrastructure.
Comment	• The Environment Agency notes the change in site boundary, and that the site is now located primarily in Flood Zone 1. They advise that a sequential approach to the layout of the site should be taken with all development in Flood Zone 1, with Flood Zones 2 & 3 being left as green open space • East Riding of York Council query whether the scale and type of development proposed on ST15 and ST27 (within the plan period) would be able to support the construction of a new junction on the A64. • Natural England confirms that previous concerns regarding the proximity of the site to the Tilmire SSSI have been partly satisfied as the site has been moved away from the SSSI and proposed housing numbers reduced. Still concerns re potential impacts from visitors to SSSI and consider that mitigation tailored to specific site should be required. Site now closer to Elvington Airfield SINC which will require mitigation. Also consider impact on bird species on candidate SINC and mitigate. We would need to see more details of the mitigation scheme before we could fully assess the impacts of such an allocation. Given the sensitivity of the location, we advise that the council considers including detailed masterplanning of the proposal including mitigation measures and bespoke policy in order to ensure delivery of measures. In addition we would like to see a requirement for mitigation measures to be delivered prior to the commencement of development. Given the need for a Sustainability Appraisal and assessment of alternatives we would re-iterate our earlier advice that alternative locations in

less sensitive areas be fully explored before any allocation is made in the Local Plan.

- Some concerns regarding green belt however a stand alone new village is preferable to 'bolting on' large areas of housing to existing village (like ST33). The development would integrate infrastructure to help achieve sustainability objectives and a Garden Village design would provide appropriate spatial layout of housing, green space and amenity open space. (Wheldrake PC).

- To facilitate ST15 objectives, significant visual and acoustic landscape separation from any new settlement must be incorporated to minimise potential conflict between the proposed residential and established aviation uses. Comment requests that due recognition be given to the Museum and Memorial's long-established and fundamental operation requirements (note reference to 1998 Development Brief) (Yorkshire Air Museum & Allied Air Forces Memorial).

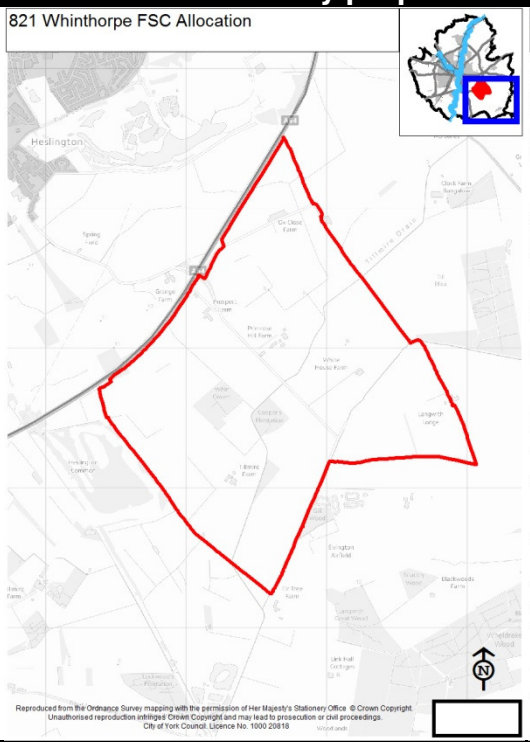
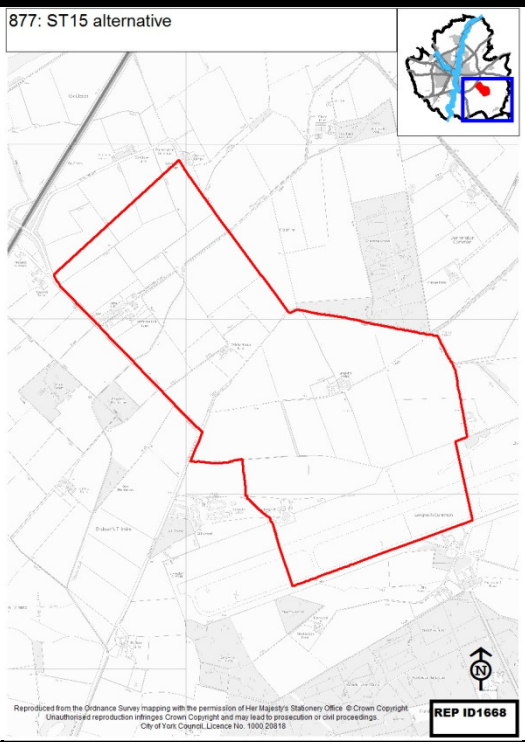
- Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a spoke facility (specification given) (Yorkshire Air Ambulance Service)

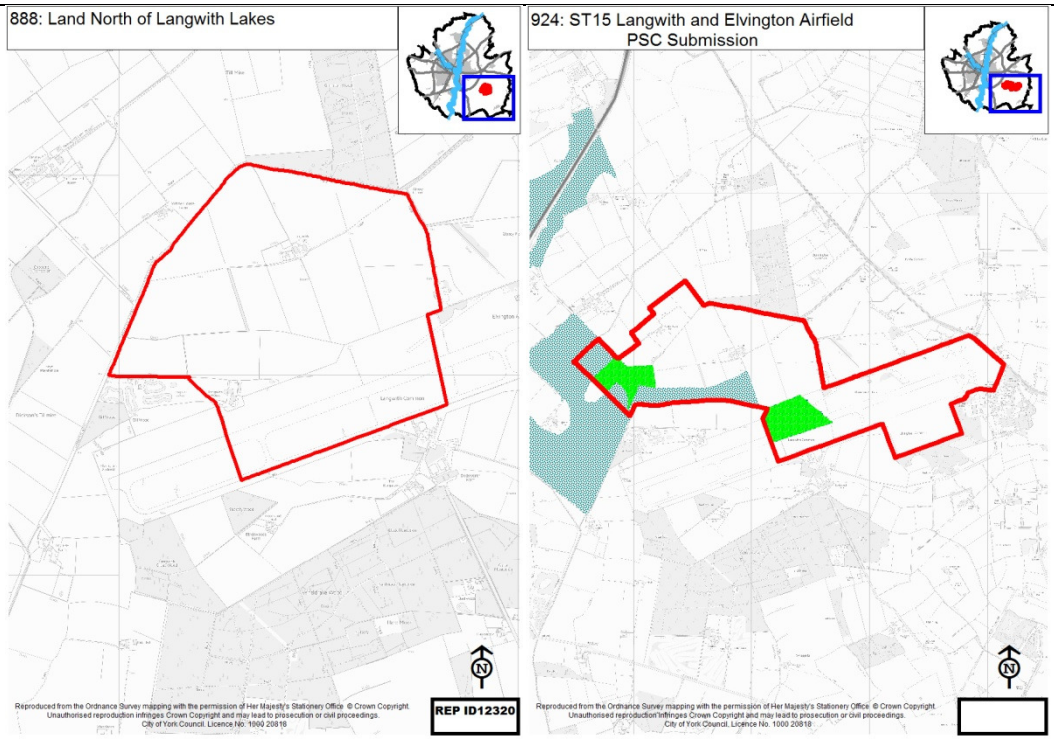
- Changes to site's capacity and location (further south of the ORR) mean ambitions for sustainable transport provision are less likely to be delivered. Note support for continued inclusion of measures to protect the Tilmire (York Green Party).

- Notes proximity of the site to proposed alternative site for business park (Land East of York Designer outlet). This could provide employment opportunities for ST15's new residents. (How Planning obo Oakgate Group and Caddick Group).

- Support the reduction in size of this allocation from 392ha to 159ha and from 4680 homes to 3340 and back the proposal to move the site southwards to protect the character and setting of York and Heslington Village as well as utilising the brownfield development opportunity at Elvington Airfield. However, also recognise that local residents continue to have concerns about the proposed development. A key challenge will be to address issues over transport infrastructure. There should be no car or bus access through Heslington Village and access to site coming via the A64 and Elvington Lane. A robust transport strategy will need to consider access issues for local residents and work should ensure the protection of Heslington Tilmire SSSI (Cllr Keith Aspden).

A number of members of the public have commented on the allocation, on the grounds of the fact that the change of name / reference has caused confusion, development should be contained so it doesn't spread

	over the existing runways, loss of tourism to the City due to the development on the airfield, no vehicle access should be allowed through Heslington, the SSSI should be protected, there should be a comprehensive transport plan, needs school / medical / shopping provision, access should be retained for existing users (eg. Langwith fishing lakes, cycle tracks, footpaths etc), should be developed at suburban densities, access / traffic congestion on A64 and surrounding roads would need careful consideration, farming and wildlife should be protected where possible, might be lots of unresolved planning issues to deal with before the site can be delivered, the benefits to be afforded to development from integrating the wood into masterplanning at the design stage, concerns about the access, student accommodation, loss of emergency landing on the airfield, the need for a water treatment facility, loss of the site as a cycle route, should be more info provided on the mitigation for transport / congestion and access issues, the site is huge and will have impacts on infrastructure and services, other sites (such as Westfield Lane, Wigginton should be considered instead, site needs direct access on to A64 and a new road network, site needs to be developed on a 'Yorkshire' theme, University expansion should be on inside of ring road, should be no access Heslington and consideration needs giving to construction traffic routes, emergency access routes, needs landscaping / screening (and green wedge), concern that tenant farmers will loose livelihood with minimal compensation, new housing should be subject to an Article 4 Direction to protect family homes, welcome CYC's recognition of earlier concerns about traffic issues, impact on SSSI, agricultural land etc, .
ST15: Alternative boundary proposed	
	



Barratt & David Wilson Homes

AMENDED SITE BOUNDARY NO.1: Support the principle of the proposed allocation of a new settlement in this location of the City by CYC. Object to the current allocation boundary of ST15 (ST34). To ensure the provision of a deliverable development proposal, which delivers circa 5,000 homes alongside each of CYC's proposed 'Planning Principles', comment suggests: BDW's land (NW of the proposed allocation) should be included within the amended boundary (site ref 821, which reflects Further Sites and halted Publication Plan); better located to provide a viable/feasible principal access point to the A64; additional land is needed to ensure that the development is deliverable and viable, helping achieve Garden Village aims of substantial community infrastructure, public open space and strategic green space, . The increase in the size of the allocation will provide a proportionate uplift in the social and economic benefits that the development can provide and provide greater flexibility in meeting the City's housing needs/delivering long term permanence to the Green Belt (Barratt & David Wilson Homes).BDW's development proposals would preserve and potentially enhance the biodiversity value of Heslington Tillmire SSSI by proving a 400m buffer zone between the SSSI and the development proposals, but also through the provision of additional landscaping and ecology areas adjacent to the SSSI. Maintains historic and landscape character of the area (key views to York Minster maintained and strategically placed open space will deliver permanent future boundaries to the site); mantains significant separation distances between the site and surrounding areas (1km from Elvington Lane and 1.5km from Heslington Village). Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links, including Elvington Industrial Estate to the south. The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

Barratt and David Wilson Homes

AMENDED SITE BOUNDARY NO.2: Support the principle of the proposed allocation of a new settlement in this location of the City by CYC. Object to the current allocation boundary of ST15 (ST34) as it needs to be expanded in order to deliver a development of 4,000 homes (plan submitted, site ref 877). In order to ensure the provision of a deliverable and viable development proposal, which delivers the number of homes prescribed by CYC as a minimum, alongside each of CYCs proposed 'Planning Principles', BDW's land located to the north west of the allocation boundary should be included within an amended boundary for the site. In order to deliver a Garden Village design philosophy, with the provision of substantial community infrastructure, public open space and strategic green space, additional land is needed to ensure that the development is deliverable. The increase in size of the allocation will provide greater flexibility in meeting the City's housing needs, deliver long term permanence of the Green Belt and provide a proportionate uplift in the social and economic benefits that the development can provide to the City. The inclusion of BDW's land within the allocation boundary will increase the viability and feasibility of providing the principal access point to the A64 by moving the allocation boundary closer to the A64 BDW's development proposals would preserve the biodiversity value of the Heslington Tillmire SSSI (proximity to SSSI is as per preferred site proposal). Proposed scheme would preserve historic and landscape character of this area of the City (key views to York Minster; strategically placed open space/new landscape will deliver permanent future boundaries to the site). Separation distances between the site and surrounding areas will remain substantial with a distance of 1km from Elvington Lane and 1.5km from Heslington. Pedestrian and cycle connections will be provided throughout the site, with connectivity to existing links including Elvington Industrial Estate. The development proposals replicate the historical development patterns of the City in respect of the formation of a satellite settlement located on the periphery of the main urban edge.

[redacted]

Propose amended boundary to include 6.7ha field to the south west quadrant of ST15. Logical extension and would 'square off' the new village (Site 888)

Sandby (York) Ltd and Oakgate / Caddick Group

Generally in support of the allocation but propose alternative boundary (site ref 924). This includes 41ha extension to north west of ST15, extension along Elvington Airfield to south-east, removal of the 'Handley Land' until technical suitability of this area can be proven as being appropriate and necessary, removal of western airfield component. This would increase brownfield intake, increase number of new homes delivered, create a net-gain in biodiversity. Would begin delivery in early stages of plan period

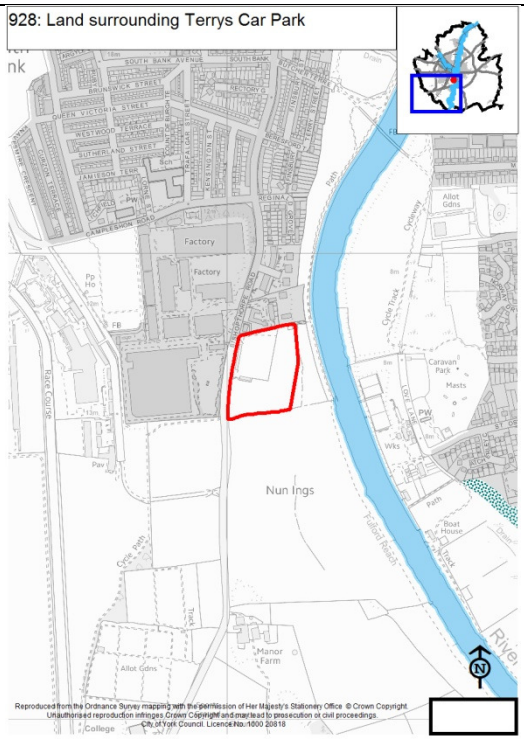
General issues raised in relation to Area 2			
Total representations: 6	**Support:** n/a	**Objections:** 1	**Comments:** 5

Key Issues Raised	
Support	N/A
Objection	• Objection to the development in the Elvington area on the

	following grounds: proposed housing levels are too high and likely to exacerbate existing traffic congestion; likely adverse impact on wildlife; development will erode the character and identity of Elvington Village.
Comment	• Area 2: Elvington - The LP Preferred Sites has been subject to 2 local public drop in sessions to assess public opinion. The PC does not oppose new residential/employment developments - but the PC has never been asked what the village actually needs - we consider the methodology to be wrong. It is clear that the village needs a better mix of properties such as larger houses and affordable homes (Elvington PC). • Other comments raised suggested that the preferred sites in this area could ruin the rural setting of Elvington (which needs protecting) and a 'new town' could be damaging to the area, especially if no infrastructure to support it. It was also suggested that the area should be left for business expansion , such as the University of York and Elvington (Research laboratories and agricultural museum. Conversely, it was also suggested that the area could support more development as it would not impact on existing residents of York and would give easy access for the A64, for employers and retailers.

ST16: Terry's			
Total representations: 10	**Support: 5**	**Objections: 5**	**Comments: 4**
Key Issues Raised			
Support	Historic England supports the stated development principles, in particular the requirement that development have strong architectural merit, reflecting the wider Terry's site. Re Extension Site 1: given its location, development should contribute to the architectural merit of the City. Support the intention to limit the height of any new buildings to the permitted height of the single-decked car park. Re Extension Site 2: development should maintain and enhance the formal gardens adjacent to the site. York Green Party welcomes the use of land to the rear of the Terry's factory (site 2) for housing provided that design complements and protects views of iconic Terry's factory buildings. Development should incorporate strong links with Sustrans cycle route and bus stops on Bishopthorpe Road. Henry Boot Developments fully support the proposed allocation of the former Terry's Car Park site for housing (Site 1). The site occupies a sustainable location and has access to public transport, public footpaths, cycle route, open space and roads. Given the topography and level of enclosure the site does not survey green belt purpose. The site would be subject to limitations on, scale, height and massing, character, openness and should have strong architectural merit. Note also objection to boundary.		

Objection	York Green Party considers that the Terry's car park site (site 1) would be more suited to allocation for health or nursery provision for the new residents of site 1, given the increased pressure on nearby existing services. Other comments note that infrastructure (including parking, doctors and schools) in the Southbank area is already struggling, and likely to be further tested by further development. Henry Boot Developments raise the following issues re ST16 (sites 1 and 2). ST16_1: We would take the view that to restrict the height of the permitted single deck car park would be a wasted opportunity and that such a limited scale of development would not deliver on the wider design objectives identified. The development of single or two storey houses at any density into his location would look out of place, therefore a development of three or four storey buildings would be appropriate. This site should be reclassified as having no significant effect/ no clear link to SA Objective; ST16_2: Key design principles, central open space, reinforcement of existing planting, perimeter streets/ circulation route and parking, three storey built development and rising to four storeys in key land mark locations. It is considered that the indicative site capacity of 56 dwellings identified into the site assessment is likely to underestimate the number of dwellings that could potentially be delivered. This site should be reclassified as having no significant effect/ no clear link to SA Objective
Comment	Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a bespoke facility (specification given) (Yorkshire Ambulance Service) Further issues raised around the potential for the site 1 to flood, and parking provision.
ST16: Alternative boundary proposed	



Henry Boot Developments

Request that the council give consideration to extending this allocation to include additional land to the South and East (site ref 928). This would make a logical extension to the car park site and would be capable of accommodating additional housing development in a sustainable and accessible location without harm to other key interests.

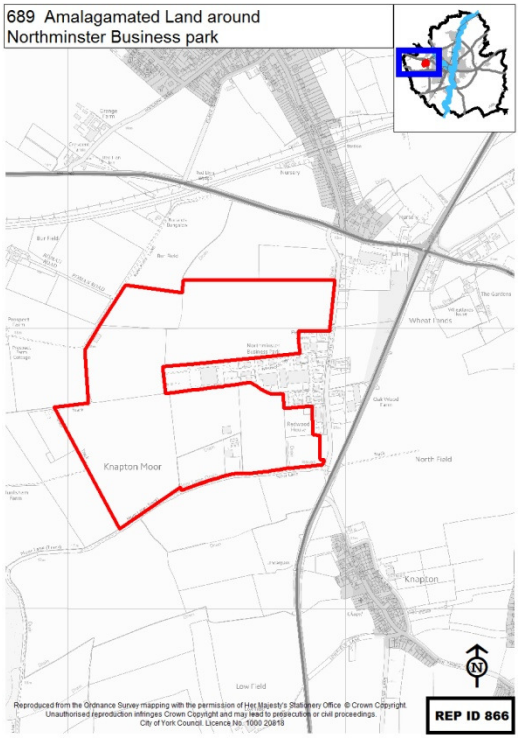
ST17: Nestle South			
Total representations: 9	**Support: 4**	**Objections: 2**	**Comments: 3**
Key Issues Raised			
Support	Historic England supports the Plan's stated Planning Principles and expect much of the commentary regarding the need for a masterplan to be prepared and the retention of those buildings considered to be of importance to be incorporated into the Plan's policy for this allocation. Other respondents support the principle of prioritising housing development on brownfield sites.		
Objection	Those objecting do so on the following grounds: increased traffic and congestion, especially on Wigginton road and loss of green space (and wildlife).		
Comment	Comments broadly relate to the need for supporting services and amenities. One comment suggests the site contribute to a stop on the York-Scarborough train line which (along with H7) could facilitate a tram-train service.		
ST17: General Area comments for Area 4			

Total representations: 9	Support: 1 relevant	Objections: 1 relevant	Comments: 2 relevant
Key Issues Raised			
Support			
Objection	The general public express concerns that development proposed has not been tested yet.		
Comment	The general public express comments on the impact the increased number of houses in this area will have on the city, the green belt and the historic setting of York.		

ST19: Northminster Business Park (formerly E17)			
Total representations: 31	**Support: 3**	**Objections: 23**	**Comments: 6**
Key Issues Raised			
Support	A small number of responses support the principle of the allocation, including Northminster Ltd who state that the existing internal infrastructure is capable of being extended to allow immediate further development. The area is suitable for all types of use class/ occupiers will be available. Access will be via the existing site entrance. The park is well screened and extensions will be integrated into this environment. Works will take place to help deliver a sustainable and integrated transport system helping to ease the traffic burden. The proposed allocation and safeguarding of land on surrounding land to the South, North and West of the Park will provide further capacity to meet employment needs for the future. All surface and foul water run- off is privately managed on site and controlled at agreed rates with the IDB and Yorkshire water. No archaeology has been found on site. Ecology is not a concern. Proposes that the site is used for use class B1 (b), B1 (c) B2 and B8. (note suggested boundary change).		
Objection	Amongst others, Nether Poppleton Parish Council, Upper Poppleton Parish Council, and Historic England object to the scale of development proposed and its likely impact on the openness of the green belt, historic character and setting of the city and villages of Poppleton and Rufforth. Historic England Advises that, to retain separation between Northminster and nearby villages, the southern extent of the site should extend no further than the existing car park to the south of Redwood House. Amongst many others, the Parish Councils note a number of further concerns, including: • the impact of transport access and egress on residents, stating that it would further impact on their quality of life and increase problems at an already congested junctions; • whether employment expansion in this area is justified given that office space elsewhere remains vacant; • amenity impacts – Northfield Lane is use by walkers, cyclists, horse-riders etc; • loss of agricultural land.		

	One objection states that the site should be instead used for residential development.
Comment	Rufforth and Knapton Parish Council does not object to the proposed business park expansion, but suggests that conditions are attached to any future consent to control access, hedging, building height, employment type and potential buffer zones. Other comments, including from Rufforth and Knapton Neighbourhood Planning Group, recognise that it does offer significant opportunities for the wider area although raise concerns over the scale/type/density of development proposed, and its impact on traffic, local amenity and green belt character.

ST19: Alternative boundary proposed



Northminster Ltd

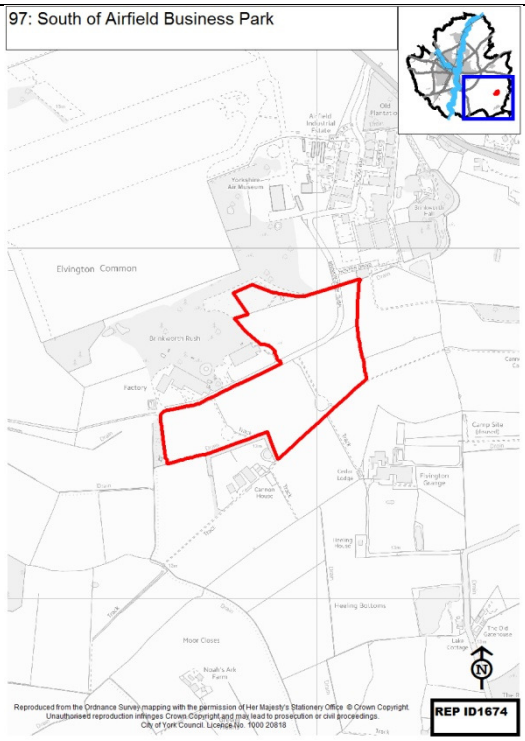
Northminster Ltd have submitted various representations to previous stages of the Local Plan process to present the case for the allocation land at Northminster Business Park. This includes a masterplan which shows the potential to lay the Park out across land to the south of the existing business park (includes fmr E17 allocation) with the opportunity for further expansion to the north (masterplan attached). Rep suggests 2.5 ha located to the south east of the existing business park could come forward for development initially, as this land is owned by Northminster Limited and is ready for development. The remaining land would then come forward in phases.

ST19: General Area comments for Area 5

Total representations: 23	**Support: 1 relevant**	**Objections: 3 relevant**	**Comments: 9 relevant**

Key Issues Raised	
Support	
Objection	General concerns for the large amount of housing in this area of York. There are also concerns for; increased traffic inadequate drainage and lack of infrastructure and services.
Comment	General comments on the large amount of housing in this area of York. There are also comments on; increased traffic inadequate drainage and lack of infrastructure and services.

ST26: Land south of Elvington Airfield			
Total representations: 19	**Support: 9**	**Objections: 6**	**Comments: 5**
Key Issues Raised			
Support	Amongst others, Elvington Parish Council and W Birch and Sons support the principle of developing the site. Conditions on support include: • That development should be conditional on archaeological/ecological assessment; • restricted B1/B8 use; • weight limits on Main Street. W Birch and Sons further confirm that here is already interest in the site. Therefore the site may be developed and occupied before the Local Plan process has been completed. We believe that further land should be allocated to for development to respond to the on going demand for land in this location. (note suggested boundary alteration)		
Objection	Objectors to the scheme cite the impact of development on agricultural land/open countryside, increased volumes of heavy goods vehicles and impact on Elvington Lane and Village as significant concerns.		
Comment	Comments reflect concerns above. Yorkshire Wildlife Trust also comments that there is potential for considerable ecological interest on site and adaptation measures through very well designed green space.		
ST26: Alternative boundary proposed			



W Birch and Sons

Extension to ST26. We believe that further land should be allocated for development to respond to the on going demand for land in this location. The density presumptions suggest more land will be required to deliver the amount of development envisaged for the site. We believe the whole site is required because this is the only basis on which we understand all identified demand will be met. There is demand for the land within a much shorter time period than the council envisages. The Council should consider allocating the remaining part of the safeguarded land SF6 for development, i.e. land to the west of site 97.

ST26: General Area comments for Area 2			
Total representations: 6	**Support: 0**	**Objections: 1 relevant**	**Comments: 4 relevant**

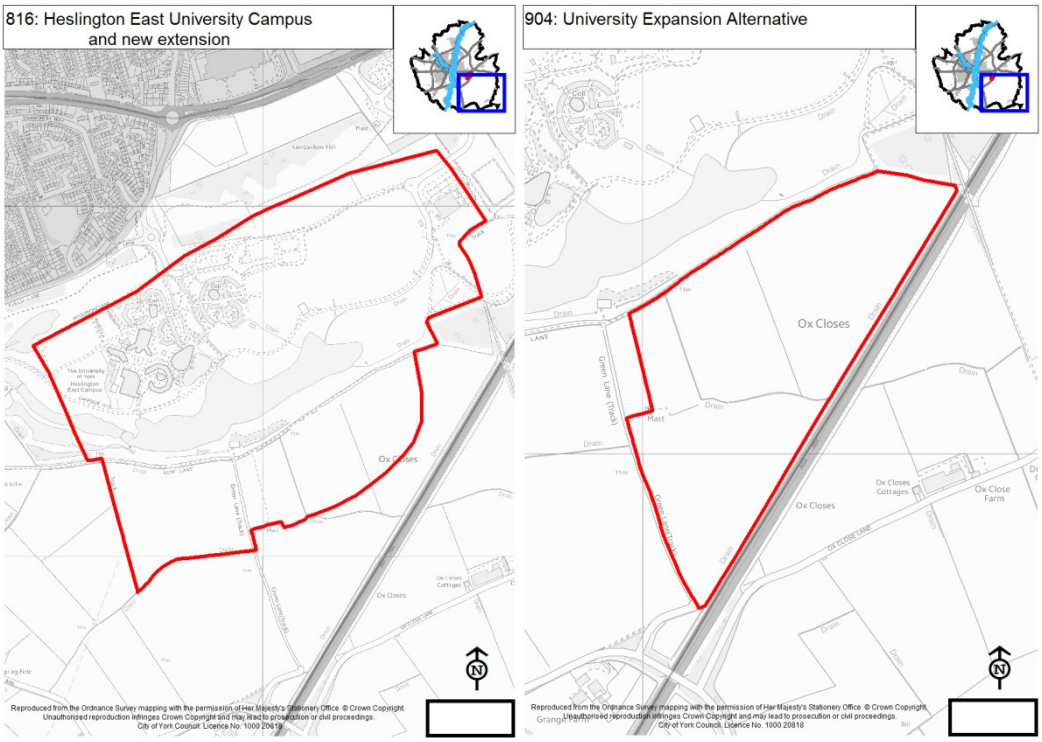
Key Issues Raised	
Support	
Objection	The general public express concerns for issues with; increased housing, increased traffic and congestion (note also implications for highway safety/pollution), negative impacts on wildlife, character and identity.
Comment	The general public express comments that, the area should not be used for housing and should be left for the expansion of the university, the need for affordable homes and concerns for increased traffic.

ST27: University of York			
Total representations: 27	**Support: 5**	**Objections: 12**	**Comments: 12**
Key Issues Raised			
Support	• Note that vehicular access from the A64 would be essential to protect sustainable transport priority access into Heslington East northern access points. Managing cumulative impact of traffic generation will need significant investment in sustainable transport solutions (light rail/tram link) to join site to city centre, university campuses and ST15 (York Green Party). • Supports principle of allocation, providing expansion space guaranteeing the University's future contribution to the need for education and research, and to the local, regional and national economies. Comment references the Publication draft Local Plan 2014, which states 'without the campus extension, the University will not be able to continue to grow beyond 2023'. The University appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST34 (O'Neill Associated on behalf of University of York); • Generally, where members of the public supported the allocation, it was suggested that certain criteria are met – such as no direct access from Heslington, uses should only be for University use rather than general employment, public rights of way are protected, and the historic views of the City are not compromised, it reflects evidence that well connected locations close to knowledge base are a significant driver for investment in the science / technology sectors.		
Objection	• Land is good agricultural land and classified as green belt. The proposal would compromise setting of the village and views. Village will be used as main thoroughfare between new development and Heslington West (Heslington PC). • Site highly visible from A64 and would intrude into open land, development would be contrary to green belt purposes, new junction off A64 would have landscape impacts, even with new A64 junction, development would have serious traffic consequences (Fulford PC); • The development potential of the proposed allocation is significantly reduced by the need to incorporate a substantial landscape buffer to A64 and the exclusion of land east of Green Lane, which is outside the control of the University. The remainder of the allocation would be only 21.5has, providing for less than 50% of the University's expansion needs within the plan period to 2032, and could not cater for compliance with Council policy on the provision of student housing and knowledge based business facilities. See supporting 'Assessment of Visual effects' for further		

	appraisal. Note that to not provide for the University's future development needs would impact on the City's ability to confirm a permanent green belt for the first time. (O'Neill Associates on behalf of University of York); • YOC oppose the development of this site. This is a potential SINC site, but the PSC document does not mention the wildlife value of the southern part of this site. As a result there is no discussion of mitigation measures and without these it is likely there would be a significant negative impact on the wildlife value of the site (York Ornithological Club). • Proposal could harm two elements which contribute to special character of the historic city. Prominent views of site from A64 very close to ring road and expansion would change relationship between York and countryside to south. Landscape buffer could be damaging if it adds 'alien' features to flat landscape. Site could damage relationship between York and its villages, reducing the gap. Could result in serious harm to SA objective 14 (Historic England). • Where members of the public objected, the comments were generally based on loss of Green Belt, loss of open space, adverse effect on historic character and setting / visual impact, over development in this location, access / traffic concerns, parking pressures, and that the University should be providing more on-site student accommodation, Heslington should be protected from becoming a direct route between the two campuses, no additional infrastructure or roads in the green belt, needs buffers, over development of Heslington, land at the western campus should be developed before the eastern side, any associated housing should be subject to an Article 4 Direction, more work places will create more demand for housing,
Comment	• Provided the planning principles set out in PSC document are adhered to, should be possible to develop site without compromising setting of Heslington and historic views of York (Heslington Village Trust); • ERYC queried whether the scale and type of development proposed on ST15 and ST27 (within the plan period) would be able to support the construction of a new junction on the A64 (East Riding of Yorkshire Council). • The site should be designed so that new lakes, scrub and grass land do not lose their value for wildlife and that ecological impacts and the needs assessment should be included in the notes for ST27 (Yorkshire Wildlife Trust). • Where members of the public commented, the comments were generally based on the recognition of the need for a thriving

university, but need for screening, consideration of access / parking issues, protection of wildlife / ecology, visual protection, the retention of public rights of way, loss of agricultural land & loss of views to the Wolds, needs direct route on to A64, increased traffic on B1228 will destroy bridleways, paths etc, essential that traffic should not access site from Low Lane .

ST27: Alternative boundary proposed



University of York (O'Neill Associates)

Objection to ST27 boundary. See alternative boundaries proposed as per the below. The development potential of the proposed allocation is significantly reduced by the need to incorporate a substantial landscape buffer to A64 and the exclusion of land east of Green Lane, which is outside the control of the University. The remainder of the allocation would be only 21.5ha.s, providing for less than 50% of the University's expansion needs within the plan period to 2032, and could not cater for compliance with Council policy on the provision of student housing and knowledge based business facilities. See supporting 'Assessment of Visual effects' for further appraisal. Note that to not provide for the University's future development needs would impact on the City's ability to confirm a permanent green belt for the first time.

Suggested amended site boundary 1 - as per 2014 Draft Local Plan 'Publication' allocation (site 816). For the University, this is the option that can best meet its development land requirements over the plan period, fundamental in terms of the local plan being able to confirm permanent Green Belt boundaries for the city for the first time. This boundary provides the best prospect of incorporating the expansion site with the existing campus and, due to the wide landscape buffer to the south of the allocation, would have less impact on the historic setting. It does not intrude into

important open areas, such as Strays or river corridors. It has the greatest prospect of aiding the City in meeting its educational and student housing aspirations, while meeting visual mitigating requirements, transport provision and other stated principles. The University appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15. See supporting 'Assessment of Visual effects' for further appraisal.

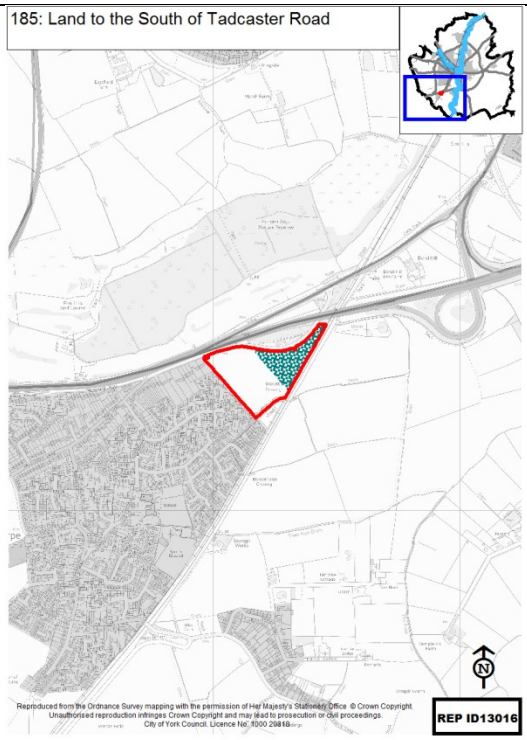
Suggested amended site boundary 2 - as per ST27, and including land to the south (see map, as per site 904). This option would provide significantly more potential than ST27 alone (around 21ha developable area, plus further 9ha open space/buffer). It does not intrude into open areas, such as Strays or river corridors. The University appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15. See supporting 'Assessment of Visual effects' for further appraisal.

General issues raised in relation to Area 2			
Total representations: 6	**Support: n/a**	**Objections: 5**	**Comments: 1**

Key Issues Raised	
Support	N/A
Objection	• Objection to the development in the Elvington area on the following grounds: proposed housing levels are too high and likely to exacerbate existing traffic congestion; likely adverse impact on wildlife; development will erode the character and identity of Elvington Village.
Comment	• Area 2: Elvington - The LP Preferred Sites has been subject to 2 local public drop in sessions to assess public opinion. The PC does not oppose new residential/employment developments - but the PC has never been asked what the village actually needs - we consider the methodology to be wrong. It is clear that the village needs a better mix of properties such as larger houses and affordable homes (Elvington PC). • Other comments raised suggested that the preferred sites in this area could ruin the rural setting of Elvington (which needs protecting) and a 'new town' could be damaging to the area, especially if no infrastructure to support it. It was also suggested that the area should be left for business expansion, such as the University of York and Elvington (Research laboratories and agricultural museum). Conversely, it was also suggested that the area could support more development as it would not impact on existing residents of York and would give easy access for the A64, for employers and retailers.

ST31: Land south of Tadcaster Road_Copmanthorpe			
Total representations: 92	**Support: 52**	**Objections: 37**	**Comments: 7**
Key Issues Raised			
Support	Support received for the principle of housing development on the site, including from Copmanthorpe Parish Council, Cllr David Carr and Gladman Developments. It is noted that the site is also included in the draft Copmanthorpe Neighbourhood Plan. Where support is recorded, in general there is reference made to the potential for Copmanthorpe to absorb the proposed scale of development without undue pressure on existing services/infrastructure, or that the Plan should provide for additional infrastructure/services to mitigate potential impact. Additional considerations raised through consultation include: • Setting back houses from the main road; • Site is preferable to loss of green belt land (referencing sites included in a previous iteration of the Local Plan); • Need to consider impact of development on semi-rural character of the village, including appropriate densities and protection of trees and hedgerows; • Note public byway at Yorkfield Lane; • No pedestrian/secondary access from Learman's Way;		
Objection	While supporting the principle of development, both Copmanthorpe Parish Council and Cllr Carr object to the housing density and the number of houses proposed, stating that numbers would overwhelm village amenities, school, medical facilities and drainage as well as roads. Cllr Carr further requests that the small triangle of land to the south of Yorkfield Lane should not be included within the development boundary. Historic England notes that developing the site would further reduce the gap between York's urban area and Copmanthorpe, harming a key element of the special character and setting of the City as identified in the Heritage Topic Paper. They recommend that the site be deleted since it is not possible to mitigate against identified harm. RSPB considers that there is currently insufficient information on the potential impacts of ST31 on Askham Bog SSSI, and the required mitigation, in the Local Plan and supporting documents. Amongst others, Shepherd Group Properties, Linden Homes and David Wilson Homes object to the site's inclusion on the grounds that the allocation is contrary to the Council's own evidence base, notably that it failed the site selection methodology and serves an important green belt purpose (preventing coalescence) which is important in preserving the special character and setting of the city.		

	A number of further issues were raised in objection to development of ST31, as follows: • Impact of additional traffic on local highway network; • Inadequate infrastructure; • Impact on natural environment, including Askham Bog, local wildlife, trees and hedgerows; • Insufficient local amenities; • Impact on flood risk, including potential for surface water flooding impacting Flaxman Croft estate; • Both the scale of development and development density proposed are too high; • Loss of green belt/agricultural land.
Comment	Natural England confirms that the combination of the location of the A64 and provision of natural greenspace adjacent to the proposal would adequately mitigate for potential recreational pressures on Askham Bog; the topography of the site reduces the risk of impacts on hydrology from development. They advise that requirement for hydrological investigation and mitigation as necessary is included as a requirement in the plan. They suggest that the Council considers requiring the delivery of the adjacent green space allocation prior to the commencement of development and further advise contact with Yorkshire Wildlife Trust regarding potential for impacts on noted SINC's and uncommon plant species in the area. Yorkshire Wildlife Trust is satisfied that development maintains existing barriers between development and the reserve (Askham Bog), and that any hydrological connection is unlikely. Other comments received refer to the need for the Plan to include development principles which ensure: protection of the natural environment; managed traffic access/egress; an appropriate response to additional demand on local services, loss of visual amenity, drainage, flooding, heavy locomotives causing vibrations, loss of green space and noise and air pollution.
ST31: Alternative boundary proposed	



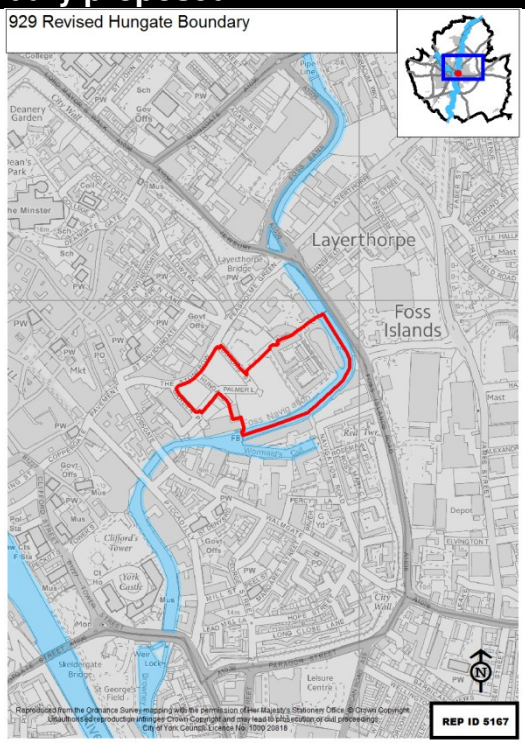
Cllr David Carr

Note suggested boundary change, removing triangle of land adj to the railway line which is not in the developer's control.

General issues raised in relation to Area 1			
Total representations:	**Support: 14**	**Objections: 3**	**Comments:**
Key Issues Raised			
Support	Those expressing support for the emerging Plan's approach to development in the Copmanthorpe area/Area 1 generally refer to more realistic housing numbers and support for the retention of green belt land to the west of the village.		
Objection	Those commenting on the principle of development typically state that Copmanthorpe does not have the infrastructure/amenities to support the number of homes proposed.		
Comment	Those commenting on the principle of development north of the ring road/Haxby/Wigginton typically mirror the comments attributed to ST31 itself, namely that the Plan should include development principles which help to manage the additional pressure on infrastructure/amenities brought about through planned developments.		

ST32: Hungate (Phases 5+)			
Total representations: 5	**Support: 1**	**Objections: 2**	**Comments: 2**
Key Issues Raised			
Support	Hungate (York) Regeneration Limited supports provisions for the Hungate site as set out in ST32. Note, for clarity, site capacity should be amended to 1025 (to include 720 granted by 15/01709/OUTM and further 305 identified through emerging Local Plan.		
Objection	n/a		
Comment	General comments around additional demand on education/medical facilities; impact on flood risk.		

ST32: Alternative boundary proposed



Hungate (York) Regeneration Limited

Boundary should remove the Hiscox building.

ST32: General Area comments for Area 4			
Total representations: 9	**Support: 1 relevant**	**Objections: 1 relevant**	**Comments: 2 relevant**
Key Issues Raised			
Support	n/a		
Objection	The general public express concerns that development proposed has not been tested yet.		
Comment	The general public express comments on the impact the increased number of houses in this area will have on the city, the green belt and the historic setting of York. Comments were also made that some of the buildings should be demolished and replaced by a good looking housing complex.		

ST33: Station Yard_Wheldrake			
Total representations: 39	**Support: 8**	**Objections: 31**	**Comments: 1**
Key Issues Raised			
Support	Vernon Land Partnerships supports the draft allocation. The site is entirely appropriate, suitable and deliverable for residential development and should be allocated accordingly as set out within the Draft Plan. Other supportive comments refer to the site being the best options should development land be required in Wheldrake, and that development could help support the village's services.		
Objection	Wheldrake Parish Council notes that the Village Design Statement does not support the proposed development, which is located on good quality agricultural land and recognised green belt. A Planning Application for development on part of the site has previously been rejected on the grounds of noise impacts on proposed adjacent properties. Site would be more appropriately used for employment expansion. RSPB states that, in the absence of a HRA having been completed, this allocation is at risk of being neither legally compliant with the Conservation of Habitats and Species Regulations 2010 nor sound, as it may not be effective, justified or consistent with national planning policy. Several common themes raised in objection to the proposed allocation, including: • Amongst other objectors, Julian Sturdy MP notes concerns around the impact of development on local facilities/services and infrastructure capacity; • the overdevelopment of the site, incompatible with village character. Some comment that development of a smaller scale, on the brownfield part of the site, would be more suitable; • loss of green belt, open countryside and views; • impact on wildlife; • Note part of site has previously been refused consent as beyond the threshold to be supported by existing services.		
Comment	General concern for lack of infrastructure (medical facilities and educational facilities), access, transport issues and increased traffic, road safety, large housing capacity, impact on drainage and flooding and environmental quality (AQ/noise/contamination).		
ST33: General Area comments for Area 2			
Total representations: 6	**Support: 0**	**Objections: 1 relevant**	**Comments: 1 relevant**
Key Issues Raised			
Support	n/a		
Objection	General concerns for issues with; increased housing, increased traffic and congestion (note also implications for highway safety/pollution), negative impacts on wildlife, character and identity.		
Comment	General comments on traffic issues suggesting easy access to the A64 and to existing large retailers and employers.		

Potential General Housing/Employment Allocations

H1 Former Gas Works_Heworth Green
H3 Burnholme School
H5 Lowfield School
H6 Land r/o The Square_Tadcaster Road
H7 Bootham Crescent
H8 Askham Bar Park and Ride
H10 Barbican
H20 Oakhaven EPH
H21 Woolnough House
H22 Heworth Lighthouse
H29 Land at Moor Lane_Copmanthorpe
H31 Eastfield Lane_Dunnington
H38 Land r/o rufforth Primary School
H39 north of Church Lane_Elvington
H43 Manor Farm Yard_Copmanthorpe
H46 Land north of Willow Bank_New Earswick
H51 Morrell House EPH
H52 Willow House EPH
H53 Land at Knapton Village
H54 Whiteland Field_Haxby
H55 Land at Layerthorpe
H56 Land at Hull Road
H57 Poppleton Garden Centre
E2 Land north of Monks Cross Drive
E5 Land at Layerthorpe/James Street (2)
E8 Wheldrake Industrial Estate
E9 Elvington Industrial Estate
E10 Chessingham Park_Dunnington
E11 Annamine Nurseries
E12 York Business Park
SP1 The Stables_Elvington

H1: Fmr Gas Works_Heworth Green			
Total representations: 8	**Support: 3**	**Objections: 3**	**Comments: 3**
Key Issues Raised			
Support	Supports refer to the use of a brownfield site for housing and sustainable location. Some concerns over density and provision of suitable access. National Grid state that the site will need to be delivered on a phased basis. Developer supports the allocation and estimated yield of 366 dwellings. Site is deliverable partly within 5 years and part phased for longer term. Northern Gas Networks who own the gasholder and associated pipeline infrastructure (0.67ha) are not currently in a position to make land available for re-development. This should not preclude the development of the land owned by National Grid and the site could be masterplanned to protect the short-term amenity of the new residents. Previous EIA demonstrates extent of contamination which can be mitigated and is not considered a showstopper. Land owned by National Grid totals 2.87ha which is immediately available.		
Objection	Objections are based on the potential flood risk of the site and the high density proposed. Also to exploring the use of the site for light industry rather than housing. Comments are also made regarding the loss of Green Space, congestion and inadequate access.		
Comment	Historic England – no objection in principle but given proximity to conservation area (No. 26 Heworth Green) and Grade II listed building on the northern side of the site proposals would need to ensure that those historic elements are not harmed. CYC should consider how new housing can meet the needs of young working people.		

H3: Burnholme School			
Total representations: 5	**Support: 2**	**Objections: 2**	**Comments: 1**
Key Issues Raised			
Support	Support for the principle of development of this brownifled site		
Objection	Sport England comments state that as the allocation contains a playing field it should be noted that approval under the Secretary of State for Education should not be interpreted as being a justification for disposal under the planning process. This approval is in respect of education		

H3: Burnholme School	
	requirements only. The allocation of this site should be based on a robust evidence base that shows that the site is genuinely surplus for all sports including non-educational sporting use of the site. If this cannot be demonstrated then the playing field should be replaced in accordance with NPPF.
Comment	Concerns re access, lack of bus services, increased demand for local amenities/facilities.

H5: Lowfield School			
Total representations: 17	**Support: 3**	**Objections: 10**	**Comments: 5**
Key Issues Raised			
Support	Supports for the site focus on the use of brownfield land for housing, provisions of housing for older persons and exploring the potential for a self build pilot.		
Objection	Objections for the site include concerns over the use of the greenspace and pitches for development – should be kept to just the building footprint/brownfield element only. Concerns over adequate highways infrastructure and access, loss of green space which is important for wildlife habitats and is a local green corridor. Also concerns over the deficiency in open space in Westfield ward including pitch provision. Sport England object to this allocation. Although the grass playing fields are outside the allocation boundary allocation H5 includes a multi use games area marked out for tennis and netball. The loss of this sports facility should be assessed in accordance with para 74 of NPPF. If it cannot be evidenced that the playing field is surplus then it should be replaced. Simply replacing the multi-use games area on existing playing field would itself result in a loss of grass playing field therefore any proposed relocation has to be on land that is not existing playing field.		
Comment	Comments in general reflect the concerns of objectors;that the loss of public space will be significant for the Ward (Cllr Waller), and that proper consideration be given to the provision of supporting services/infrastructure.		

H6: Land r/o The Square, Tadcaster Road			
Total representations: 21	**Support: 4**	**Objections: 8**	**Comments: 10**
Key Issues Raised			
Support	Supports confirm that the proposed specialised housing for the		

H6: Land r/o The Square, Tadcaster Road	
	Wilberforce Trust is a more compatible neighbour to the adjacent St Leonards Hospice than open market housing. Access needs to be carefully considered including access for emergency vehicles.
Objection	Objections relate to sensitivity of location close to the hospice and impacts on tranquillity for residents. Concerns are raised surrounding the additional traffic and the increase in congestion, loss of existing greenspace including loss of habitats and mature trees. Note point of clarification re land ownership at access point to site. While supporting the scheme in principle, the Wilberforce Trust seek to clarify that the proposal is for 30-35 residential units for visually impaired tenants plus new headquarters building for Wilberforce Trust. Object to designation as C3b specialist housing within PSC and to site boundary. Site should be extended to include 0.5ha of land to rear of St Leonard's Hospice. C3B is defined as 'not more than 6 residents living together as a single household where car is provided'. Whilst there is a level of care associated with the proposed units this is administered to tenants on an individual basis. Each apartment will be 1 or 2 bed with private bathroom, kitchen and lounge. There will be some shared facilities but the units will function as private dwellings and therefore should be classed as C3 (housing).
Comment	Comments in general reflect the content of objections received, in respect of access concerns, impact on traffic and congestion and impact on existing residents of The Square. Dringhouses Local History Group draw attention to the site as one of the very few remains of medieval ridge and furrow left in Dringhouses, and that trees on site have historic value.

H7: Bootham Crescent			
Total representations: 4	**Support: 1**	**Objections: 1**	**Comments: 2**
Key Issues Raised			
Support	Support for the potential to enhance the area through site's redevelopment.		
Objection	Sport England object to the allocation on the basis that the site contains a playing field and that whilst relocation is taking place, the redevelopment of the community stadium included an existing playing pitch, and therefore there will be a net loss of one pitch. The allocation		

H7: Bootham Crescent	
	of the site should be based on a robust **evidence base** that shows the site is genuinely surplus for all sports, including ancillary facilities such as changing rooms, grandstands etc; otherwise, the Council will need to identify potential replacement provision prior to re-development.
Comment	Comments received re site's potential overdevelopment and need for car parking.

H8: Askham Bar Park and Ride			
Total representations: 29	**Support: 3**	**Objections: 22**	**Comments: 4**
Key Issues Raised			
Support	Supports relate to the use of brownfield land for housing.		
Objection	Number of objections received and main issues raised include increased congestion, impact on Askham Bogg, lack of local facilities including school provision and also that it should be used as a site for the creative academy rather than for housing. This includes representation from the Ebor Academy Trust who would like to build a Creative Arts Primary School on the site. Representation states that the Trust have been successful in its free school application for the national funding of a creative arts free school which will provide funding for build, set up and recompense for land.		
Comment	Concerns raised for the impact on congestion/traffic and availability of local amenities/services.		

H10: Barbican			
Total representations: 7	**Support: 2**	**Objections: 2**	**Comments: 3**
Key Issues Raised			
Support	Supports relate to the principle of re-use of brownfield land for housing.		
Objection	Objections relate to the use of the site for high density housing, concerns over adequate local infrastructure and retention of the site for a city park.		
Comment	Historic England - No objection to principle of this application, but given its proximity to city walls (scheduled ancient monument) and central conservation area, proposals would need to ensure that those important historic elements are not harmed.		

H10: Barbican	
	Further comments address the potential implications for infrastructure/local services and the need to deliver affordable homes for young working people.

H20: Oakhaven EPH			
Total representations: 3	**Support: 2**	**Objections: 0**	**Comments: 1**
Key Issues Raised			
Support	Representation received from CYC Older Persons Accommodation Programme. Care Home closed March 2016. The Executive have agreed to re-develop for extra care housing (Use class C3). The overall quantum for the site is likely to be 30 to 40 units therefore PSC site capacity should be increased		
Comment	Comment queries whether site may be overdeveloped.		

H21: Woolnough House			
Total representations: 3	**Support: 1**	**Objections: 0**	**Comments: 2**
Key Issues Raised			
Support	General support for redevelopment of a brownfield site.		
Comment	Representation received from CYC Older Persons Accommodation Programme which states that Woolnough House will remain in operation as a residential care home and will only close and be available for re-development once consultation on the option to close has been undertaken and following that should Executive make a decision to close. Comment queries whether site may be overdeveloped.		

H22: Heworth Lighthouse			
Total representations: 2	**Support: 1**	**Objections: 0**	**Comments: 1**
Key Issues Raised			
Support	Support redevelopment of Brownfield land.		
Comment	Original plan was for 13 homes, now 15(14% increase) indicating a potential cramming of houses.		

H29: Land at Moor Lane, Copmanthorpe			
Total representations: 90	**Support: 59**	**Objections: 25**	**Comments: 7**
Key Issues Raised			
Support	General supports for development of the site in principle but concerns raised over number of dwellings and proposed density (including from Cllr David Carr). This is linked to capacity of existing infrastructure. Developer confirms that the site is suitable, available and achievable. Site can deliver the proposed 88 dwellings. Completions anticipated in 2019/20 @ 35 dwellings per annum. Proposed access to Moor Lane. Moor Lane to be widened to meet acceptable highway standards There is sufficient verge space without needing to encroach onto existing properties. (Barratt and David Wilson Homes)		
Objection	Objections on this site relate to concerns regarding access to the site from Moor Lane particularly as it is a narrow road and would require widening which would impact on the existing grass verges. It is also considered that there would be issues regarding visibility and parking. Concerns are also raised regarding access to services and the lack of capacity of existing services including schools.		
Comment	Comments reflect the general objections received, in terms of traffic impacts, potential for overdevelopment, impact on local character and amenities. Julian Sturdy MP notes residents' concerns over impact of additional traffic on Moor Lane.		

H31: Eastfield Lane, Dunnington			
Total representations: 66	**Support: 8**	**Objections: 42**	**Comments: 16**
Key Issues Raised			
Support	Supports accept the principle of housing on the site but would need to retain the existing hedgerows and consider how safety/amenity issues on Eastfield Lane could be overcome. Considered to be the best option for housing in the village. Developer/landowner supports the proposed site H31 in Preferred Sites Consultation and confirms that the site is suitable, available and achievable. Site can deliver the proposed 84 dwellings. Completions anticipated in 2019/20 @ 35 dwellings per annum. (Barratt and David Wilson Homes)		
Objection	Objections on the site (including from Dunnington Parish Council) relate to concerns over a suitable access to the site, road safety and visibility and the narrowness of Eastfield Lane. Concerns are raised over surface water and drainage issues in the village, the capacity of existing facilities		

H31: Eastfield Lane, Dunnington	
	in the village including schools, loss of greenbelt land and the loss of wildlife habitats. In promoting an alternative site (H33) Yorvik Homes object given that carriageway widening of Eastfield Lane would alter the rural character of the eastern edge of the village and the site does not perform well against the sustainability criteria applied by the council in their sieving of sites.
Comment	While not opposing development, a number of comments received reflect the concerns of those objecting to the scheme, namely impact of additional traffic in vicinity of Eastfield Lane/church Balk, lack of capacity in local services and impact on local village character. Julian Sturdy MP notes that residents are concerned about this site due to issues with: drainage, sewerage, access, public transport and increase in the size of the site.

H38: Land r/o Rufforth Primary School			
Total representations: 19	**Support: 8**	**Objections: 10**	**Comments: 1**
Key Issues Raised			
Support	Support for the site being included as an allocation focuses on the potential for the site to deliver small scale development/affordable housing in the village. Conditional support, including from Rufforth and Knapton Parish Council and from the emerging Rufforth and Knapton Neighbourhood Plan points to the need for further consideration to be given to an appropriate mix/type of housing, parking provision, sewerage and drainage. The developer (Linden Homes) supports the site's development, noting that the site was assessed as part of CYCs rigorous site selection methodology and as a result of passing the process the site was proposed as a housing allocation in previous versions of the draft local plan. Suitability of the site is not therefore in question. They also confirm that the site is available, and deliverable.		
Objection	Those objecting to the site's development point to the likely negative impact on local amenity, namely in terms of additional traffic, impact on village character and community, poor sewerage and drainage (potential for flood risk) and lack of local facilities, including school spaces. Development of green belt land is also a concern. A number of objections comment on the approval of a pig-breeding barn adjacent to		

H38: Land r/o Rufforth Primary School	
	the site, bringing it closer to domestic dwellings than when approval was granted.
Comment	Notes residents' concerns about issues with: flooding, drainage and traffic. These issues should be solved before development takes place. (Julian Sturdy MP)

H39: North of Church Lane, Elvington			
Total representations: 100	**Support: 3**	**Objections: 91**	**Comments: 6**
Key Issues Raised			
Support	Supports relate to the site being a logical extension to the village and preferable to the allocation of site at Dauby Lane (H26). The developer/landowner supports allocation in principle and confirms that site is suitable, deliverable and viable. Suggest that site viable to deliver 28 dwellings. Larger boundary could be accommodated without detrimental effect on Green Belt or village. Existing village boundary not defensible in long-term. Reconsider larger site 789 (West of Beckside).		
Objection	Objections are raised in relation to the following issues: • Impact on character of village; • Loss of greenbelt land; • Concerns over access to site and impact on local roads including Beckside and Church Lane. Roads and footpaths are narrow, rural roads and concerns for pedestrian safety and parking; • Impact on surface water and water pressure; • Lack of capacity in existing local facilities including school places; and • Loss of wildlife habitats including SINC quality hedgerows. Elvington Parish Council comments that a previous inspector determined this site serves green belt purposes. Extra traffic would be generated from 32 homes and adversely impact on exiting residents of Beckside. Density of homes should be similar to existing Beckside development to minimise any 'difference' to the phases. In the absence of a HRA having been completed, the RSPB note that his allocation is at risk of being neither legally compliant with the Conservation of Habitats and Species Regulations 2010 nor sound, as it may not be effective, justified or consistent with national planning policy.		

H39: North of Church Lane, Elvington	
Comment	Comments generally reflect objections concerns summarised above, in relation to scale of development and its impact on local infrastructure. Concerned about this site due to issues with the extra traffic that will be generated and the negative impact this will have on local residence. (Julian Sturdy MP) Environment Agency - site is located close to River Derwent and Derwent Valley SAC/SPA/Ramsar/SSSI. This is a designated site which is failing to meet its protected area objectives and WFD objectives and efforts to improve this stretch of river and associated water dependent habitats come under the Derwent Restoration Plan. One of the key issues is sediment. Should the site remain as an allocation it would be critical to ensure that sediment from the construction site does not end up in the River or local ditches. Ideally Surface Water should not be discharged into the river. Checks must be made by CYC to ensure that no cross connections on completion to ensure no contamination.

H43: Manor Farm Yard, Copmanthorpe			
Total representations: 51	**Support: 41**	**Objections: 7**	**Comments: 4**
Key Issues Raised			
Support	Supports confirm that the site is suitable for the size of Copmanthorpe and its existing facilities and infrastructure. Copmanthorpe Parish Council accepts the principle of the scheme but only as a small scale development of 5 homes or less.		
Objection	Objections regarding the impact of additional development on local infrastructure; that , housing density proposed is too high and that the farmyard is habitat to birds and bats.		
Comment	Historic England – Site adjoins boundary of Copmanthorpe Conservation area and Grade II listed building adjacent to north eastern corner of site. The Plan should make it clear that any development proposals would need to ensure that those elements that contribute to the significance of the CA and listed building are not harmed.		

H46: Land North of Willow Bank_New Earswick			
Total representations: 86	**Support: 5**	**Objections: 48**	**Comments: 35**
Key Issues Raised			
Support	Both objections and comments to the scheme raise similar issues: the likely impact of development on traffic and congestion (locally, and onto the A1237), lack of local services/infrastructure, poor drainage and flood		

H46: Land North of Willow Bank_New Earswick	
	risk. Concerns are also raised regarding the loss of the sports club and MUGA in New Earswick. Strensall with Towthorpe Parish Council notes that the site represents the views of residents of the Parish. The Joseph Rowntree Housing Trust fully supports the councils proposed allocation and will support the allocation. The site has access to regular buses and CYC highways officers have no adverse comments on traffic. The site did not form part of one of the important green wedges. It is not anticipated that any contamination or contamination that cannot be remediated will arise. Suitable vehicular access into the site will be provided along with pedestrian and cycle access. The tree belt along the eastern edge of the site is to be excluded. The site will promote a mixed of cohesive community providing a wide range of housing mix. The site is not at risk of flooding. The proposal will be sustainable in terms of physical characteristics, character and social composition. residential development are to be built away from listed buildings. Changes have been made to the layout of for more flexible living and self- help ethos. This development will help meet the Trust's and The City's need for affordable housing. The proposal will not affect visual importance as views of the church are now all but obscured by the dense tree belt along the eastern boundary and landscape character will be retained. Note objection to development yield and open space provision - River Foss Society support the principle of a green corridor, and consider that the run-off from the site could be containable through the implementation of SUDS.
Objection	Both objections and comments to the scheme raise similar issues: the likely impact of development on traffic and congestion (locally, and onto the A1237), lack of local services/infrastructure, poor drainage and flood risk. Concerns are also raised regarding the loss of the sports club and MUGA in New Earswick. New Earswick Parish Council raises objection to development on the following grounds: flood risk in local area; drainage and sewerage issues; loss of open space, both in visual terms and as a longstanding recreational area; insufficient local amenities and services to accommodate additional demand; additional traffic congestion (Haxby Road) and potential parking issues. Site should instead be defined as green belt.

H46: Land North of Willow Bank_New Earswick	
	Huntington and New Earswick Liberal Democrat Cllrs raise concerns about loss of recreational space and loss of the sports club and MUGA. This land is the only major area of recreational land for New Earswick and also used by people from Huntington. It should be retained for future recreational facilities. The desire of JRHT to develop housing here is distorting its provision in the village. Loss of recreation space near Red Lodge makes this area more important as a relocation site for this use. Since Brexit and resulting reduced international migration there should be further reviews of smaller site requirement, therefore, this site should be removed from the Plan. While Joseph Rowntree Housing Trust fully support the site's allocation, they object to the Council's stated reasoning for the split between built and open space; they do not consider it possible to produce a housing scheme for 104 dwellings on approx half of the site in a form which reflects the character of the village itself. It is not accepted that there is a deficiency of open space in New Earswick. It is not accepted that the site is part of a local green infrastructure corridor linking New Earswick and Huntington along the Foss corridor. Ecological concerns have now been clarified and resolved. The site will promote a mixed of cohesive community providing a wide range of housing mix. The site is not at risk of flooding. The proposal will be sustainable in terms of physical characteristics, character and social composition. residential development are to be built away from listed buildings. Changes have been made to the layout of for more flexible living and self- help ethos. This development will help meet the Trust's and The City's need for affordable housing. The proposal will not affect visual importance as views of the church are now all but obscured by the dense tree belt along the eastern boundary and landscape character will be retained.
Comment	General comments reflect the concerns of objectors above, around the impact of development on local infrastructure. Historic England raises no objection in principle, but comments that the plan should make it clear that any development would need to ensure that those elements which contribute to the significance of the New Earswick Conservation Area are not harmed. Yorkshire Wildlife Trust note that bats are likely to live on site and lighting of new housing would disturb them and the layout of the site will need to factor this in by possibly locating housing to the South of the site. Wigginton Parish Council do not object in principle but comment that the

H46: Land North of Willow Bank_New Earswick	
	necessary infrastructure must be addressed before development commences, in terms of schools; housing mix and type; upgrades to transport infrastructure (strategic network and local roads); public transport; congestion and parking; pedestrian safety; sewerage and drainage; employment, training and development; retail facilities; environmental issues; impact of construction on existing residents and businesses. By halving the site this allows for the concept of River Foss Regional Green Corridor which is supported. The developable area of this site would create run off with a possible knock on effect on flooding elsewhere though deemed containable through the implementation of SUDS. Question raised if SUDS standards are adequate with anticipated increases in rainfall associated with climate change and implications for Willow bank site. (River Foss Society)

H51: Morrell House EPH			
Total representations: 3	**Support: 1**	**Objections: 0**	**Comments: 2**
Key Issues Raised			
Support	Support redevelopment of Brownfield land.		
Objection	n/a		
Comment	Representation received from CYC Older Persons Accommodation Programme. States that Morrell House will remain in operation as a residential care home and will only close and become available for re-development once consultation on the option to close has been undertaken and following that should Executive make a decision to close.		

H52: Willow House EPH			
Total representations: 5	**Support: 1**	**Objections: 1**	**Comments: 3**
Key Issues Raised			
Support	Support for use of brownfield land. Housing should be affordable and priority for young residents of the city who need housing.		
Objection	Objection to the closure of the elderly persons home.		
Comment	Historic England – Site adjoins the City Walls (SAM) and CHCCA. Given importance of City Walls great care would need to be taken in order to ensure that the elements which contribute to their significance are not harmed. Note that decision has not yet been made regarding residential care		

H52: Willow House EPH	
	home closure. (CYC Adult Social Care) (*Option to close the Older Persons Home and sell the site subsequently agreed by Executive in November 2016)*.

H53: Land at Knapton Village			
Total representations: 27	**Support: 3**	**Objections: 22**	**Comments: 2**
Key Issues Raised			
Support	Supports confirm that the site is suitable for housing but that the site capacity should be reduced to a maximum of 4 dwellings. Site is included as a potential site in the emerging neighbourhood plan for Rufforth and Knapton but with a maximum capacity of 4 units. Rufforth and Knapton Parish Council recognise that this small site is suitable for housing, but note that approximately 60% of residents in Knapton would prefer H53 site to remain as green belt, as the only parcel of green land left in the village. Further, site would not support development of 11 properties...should be a maximum of 4 properties. Representation received from landowner/developer which supports the proposed allocation of land at Knapton village for residential use. Whilst Novus agrees the site is suitable to be allocated for residential use the assessments which have informed the planning application and subsequent feedback from the Council and local residents indicate that the indicative local plan capacity of 11 dwellings is too high. Technical site assessments undertaken to date suggest amendments are needed to the local plan site assessment proformas to indicate that access should be from Main Street and that the indicative capacity of 11 dwellings is too high. The site assessment work undertaken suggests that it is more appropriate to access the site from Main Street rather than Back Lane.		
Objection	Objections raised concerning the impact of 11 dwellings on the character of the village, housing number is too high, narrow lane which is not suitable for widening, current problems with existing drainage which will be exacerbated, loss of agricultural land and impact on mature trees. Also concerning lack of facilities within the village.		
Comment	Julian Sturdy MP notes residents concerns about this site due to issues with: loss of character, poor access to services, limited open space, limited public transport, Green Belt land, sewerage, surface water drainage and the impact new development may have on this issues.		

H53: Land at Knapton Village	
	Further comment received re need for preservation off wildlife habitats and mature trees. Bat survey should be carried out

H54: Whiteland Field, Haxby			
Total representations: 275	**Support: 10**	**Objections: 222**	**Comments: 43**
Key Issues Raised			
Support	A small number of supports were received for the site (including for Strensall with Towthorpe Parish Council) .Where support was recorded, in general there is reference made to the suitability of the site for housing and that it is a well contained site. The developer/landowner confirms that the site is deliverable and viable.		
Objection	A significant level of objection was received. Key issues raised include: • impacts on local traffic congestion particularly on Usher Lane; • current congestion levels on the A1237 and in particular the Haxby/Strensall roundabout would be compounded by further development. A number of comments refer to the need to dual the outer ring road prior to any further development taking place; • Concern that existing public transport provision is unsatisfactory and could not provide for additional residents; • inadequate drainage and sewerage – that the new drainage would need to be installed before any development took place, that the current sewerage system is totally inadequate in the village, that the WWTW at Strensall is at or above capacity and that currently surface water flooding regularly causes the sewers to back up in heavy rain; • Many comments point to the need for development to be self sufficient in amenities/services, including the provision of a primary and secondary school and GP provision; • Significant 'piecemeal' development has already taken place in Haxby which has already impacted upon the character of the area and the adequacy of the existing levels of community facilities; and • Site is crossed by two high voltage pylons which would be expensive to move or require a reduction in site area. Julian Sturdy MP states: "I do not believe that this is a logical site for inclusion in the Local Plan due to issues with, flooding, pylons and		

H54: Whiteland Field, Haxby	
	electricity."
Comment	Members of Wigginton Parish Council do not object to further development but the necessary infrastructure must be addressed before development commences, in relation to: schools; housing mix and type; upgrades to transport infrastructure (strategic network and local roads); public transport; congestion and parking; pedestrian safety; sewerage and drainage; employment, training and development; retail facilities; environmental issues; impact of construction on existing residents and businesses Other comments received reflect the concerns of objectors raised above, in relation to traffic/parking and other local infrastructure. Cllr Ian Cuthbertson and Haxby and Wigginton Liberal Democrats raise significant concerns re need for development to consider the following: mix/type should reflect social and demographic mix of the area; provision of open space; impact on local infrastructure; access to employment land; transport and traffic impacts.

H55: Land at Layerthorpe			
Total representations: 3	**Support: 2**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Limited number of representations received. Supports agree with use of brownfield land for housing subject to controlling parking on Redeness Street		
Objection	Objection relates to retaining the site for commercial land.		
Comment	n/a		

H56: Land at Hull Road			
Total representations: 23	**Support: 9**	**Objections: 9**	**Comments: 6**
Key Issues Raised			
Support	General supports confirm that site is a sustainable location for new housing, there is a need for family and affordable homes and that the site is screened by mature trees, including from Heslington Village Trust.		

H56: Land at Hull Road	
	Heslington Parish Council generall support the site provided that access is not be taken from Windmill Lane, to protect Heslington village. The allocation of the site for residential development is supported by the York St John University. Any future development of the site will have to retain significant tree belts on the northern and eastern boundaries, and existing tree planting on the west boundary. In addition new tree planting will be required to achieve an effective screen between the new development and the tennis centre. Retention of the existing access road will also be needed to maintain access to the tennis centre and to serve the proposed residential development. This would, in effect, divide the site into two developable areas separated by a shared access. This will reduce the capacity of the site to circa 80 dwellings.
Objection	Objections relate primarily to loss of sports pitches and local green space without suitable local replacement and also regarding increased congestion on Hull Road. Also some concerns regarding the high number of dwellings suggested in the PSC. Cllr Warters objects to development on the following grounds: loss of sports pitches without adequate local replacement in an area already deficient in accessible public open space; traffic on Hull Road makes residential use untenable (see Inspector's comments re Sainsbury's / B+Q). While supporting th principle of development on the site, York St John University considers that both the developable area and density outlined in the PSC document would not be achievable and that a further assessment of the site should significantly reduce the net developable area from the 3.8ha assumed in the PSC. It is calculated that a realistic developable area is 2.13ha. The Masterplan indicates the site capacity is circa 80 dwellings. Sport England comments as follows: 'We note that the playing field will be replaced and equal in terms of quality, quantity and access. In respect of any proposals to replace playing field, replacement must represent a genuine replacement i.e. creation of a new playing field. Improvements to existing playing field do not represent a genuine replacement because the quantity element of the exception has not been addressed only the quality element. The quantity element can be addressed by bringing into use areas of an existing playing field that are

H56: Land at Hull Road	
	currently incapable of supporting a pitch or pitches without significant works, or creating new playing field on land that is not currently playing field' City of York Hockey Club formally objects to the site's allocation. The loss of playing fields is contrary to NPPF and Sport England guidance, as insufficient justification has been made to warrant the loss of a much needed facility which is still used for recreational use. The recent loss of playing pitches across the City has simply not been balanced out by the creation of new facilities. Particularly facilities that are available for wider community use. Therefore, the Hull Road site should be retained for recreational use.
Comment	Comments generally share the concerns of objectors above, in relation to loss of pitches, local character, need for family (rather than student) homes and impact on infrastructure.

H57: Poppleton Garden Centre			
Total representations: 38	**Support: 2**	**Objections: 26**	**Comments: 11**
Key Issues Raised			
Support	Support proposed allocation of site for residential purposes that will make a positive contribution towards meeting the Council's identified housing need, and reuse brownfield land.		
Objection	Significant number of objections received, raising concerns around: the loss of the garden centre; impact on traffic congestion (and unrealistic reliance on Park and Ride site), including cumulative impact of other proposed developments (British Sugar/York Central); site is physically removed from the village's amenities; potential to increase flood risk (Carr Dyke); impact on historic character and setting of the City/coalescence. Historic England note that it is likely that this allocation would cause harm to a number of elements identified as contributors to the historic character and setting of York - reducing the gap between Northminster Business Park and the perceived southern boundary of Poppleton. Mitigation measures should include reducing the scale of the site to remove land to the south of the existing buildings. Historic England have no objection to redevelopment of the part of the site currently occupied by existing buildings.		

H57: Poppleton Garden Centre	
	Persimmon Homes objects to the principle of the scheme, given that the site is unlikely to come forward in the near or medium term; the existing use far exceeds alternative residential use.
Comment	Both Upper and Nether Poppleton Parish Council comment that there is a need for houses but also for sustainable employment, which is currently provided by the existing garden centre; protecting historic character and setting, impact on local nature conservation and traffic/congestion are key concerns.

E2: Land North of Monks Cross Drive			
Total representations: 7	**Support: 3**	**Objections: 2**	**Comments: 2**
Key Issues Raised			
Support	Amongst others, Strensall with Towthorpe Parish Council supports the site which, as infill development in existing built up area, constitutes a suitable development site for employment use..		
Objection	Those objecting to the proposed allocation do so on the likely impact on local traffic congestion and congestion on A64/A1237.		
Comment	Members of Wigginton Parish Council do not object to further development but the necessary infrastructure must be addressed before development commences		

E5: Land at Layerthorpe_James Street			
Total representations: 2	**Support: 1**	**Objections: 1**	**Comments: 1**
Key Issues Raised			
Support	Support infill development in existing industrial area.		
Objection	Land at Layerthorpe/James Street. Site should remain unallocated to maximise flexibility. There has been a gradual loss of employment use in the area driven by natural changes in the market. Site scores below Employment Land Review 'moderate' score. Saving for employment use would be contrary to NPP in this context. (Yorvale and Maple Grove Developments)		
Comment	Agree with development constraints. 900sqm reasonable given existing floorspace and density of circa 45%. Concerned that permission of alternative uses in the area making the less attractive for employment. Removal of permitted permission 15/01571/FULM from boundary reduces site size to below threshold. (Yorvale and Maple Grove		

E5: Land at Layerthorpe_James Street	
	Developments)

E8: Wheldrake Industrial Estate			
Total representations: 5	**Support: 0**	**Objections: 5**	**Comments: 0**
Key Issues Raised			
Support	n/a		
Objection	Wheldrake Parish Council and others object to the proposed allocation due to impact on village character/Conservation Area. Infrastructure demand is also of concern.		
Comment	n/a		

E9: Elvington Industrial Estate			
Total representations: 13	**Support: 6**	**Objections: 7**	**Comments: 1**
Key Issues Raised			
Support	Elvington Parish Council supports the principle of employment development at E9 (noting that the site is Greenfield rather than Brownfield as described). William Birch and Sons, alongside a number of others, support the site as a natural extension to existing business parks at Elvington Arifield.		
Objection	Thos objecting to the proposed allocation do so on the grounds that nearby residents be affected by noise and air pollution, and the highway safety impacts of additional traffic using the access road.		
Comment	As with Elvington Parish Council's comment above, others state that the site is Greenfield rather than Brownfield as described.		

E10: Chessingham Park_Dunnington			
Total representations: 4	**Support: 3**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Dunnington Parish Council supports E10 as infill development in an existing built up area.		
Objection	Empty units already so why build more?		
Comment	n/a		

E11: Annamine Nurseries			
Total representations: 3	**Support: 1**	**Objections: 1**	**Comments: 1**
Key Issues Raised			
Support	Support redevelopment of Brownfield land.		
Objection	Greatly concerned about impact of additional traffic locally and in connection with housing development proposed in the vicinity.		
Comment	Feasibility of planned sites must be tested priori to allocation; employment proposals will add pressure and the combination of developments is potentially going to make living and working here unbearable		

E12: York Business Park			
Total representations: 1	**Support: 1**	**Objections: 0**	**Comments: 0**
Key Issues Raised			
Support	Supports infill development in existing built-up area.		
Objection	n/a		
Comment	n/a		

SP1: The Stables_Elvington			
Total representations: 22	**Support: 0**	**Objections: 22**	**Comments: 0**
Key Issues Raised			
Support	Objections received from a number of respondents, including Elvington Parish Council, relating to: site's green belt status - Inspector's (now expired) decision only grants temporary consent; site is part of historic landscape of Brinkworth Estate, noting visual impact of development; traffic and road issues re access from B1228.		
Objection	n/a		
Comment	n/a		

Deleted Strategic Housing/Employment Allocations

ST11: Land at New Lane, Huntington
ST12: Land at Manor Heath, Copmanthorpe
ST13: Land at Moor Lane, Copmanthorpe
ST16: Terrys
ST18: Monks Cross North
ST21: York Designer Outlet
ST25: South of Designer Outlet
ST29: Land at Boroughbridge Road
ST30: Land to North of Stockton Road

ST11: Land at New Lane_Huntington			
Total representations: 6	**Support: 2**	**Objections: 3**	**Comments: 1**
Key Issues Raised			
Support	Support for the removal of site on the grounds of its potential impact on congestion on surrounding roads, loss of visual amenity and parking. Cllrs Runciman, Cullwick and Orrell comment that this is the most insensitive and inequitable proposal in the Plan given the strain put on the area by recent developments.		
Objection	Persimmon Homes and Barratt and David Wilson Homes object to the site's removal from the Plan, noting that it is located in a very sustainable location close to local facilities including substantial employment, as well as park and ride. Site could offer potential for circa 250 housing units and associated infrastructure improvements. Rep proposes mitigation measures to address CYC concerns raised in Preferred Sites document.		
Comment	General concern around impact of development on traffic and local amenities/services.		

ST12: Land at Manor Heath_Copmanthorpe			
Total representations: 49	**Support: 43**	**Objections: 3**	**Comments: 3**
Key Issues Raised			
Support	A significant number of responses, including from Cllr David Carr and the York Cycle Campaign, support the intention to return this proposed site to green belt, deleting it from the preferred list of development sites. Commonly these refer to the level of development proposed bringing about an unwelcome change to the character of the village and that Copmanthorpe's services/amenities would be overburdened by additional demand.		
Objection	David Wilson Homes and Linden Homes both object to the deletion of ST12, stating that the site serves little or no green belt purpose and had previously satisfied CYC's site assessment as it was included as a potential allocation at 'Further Sites' stage (site ref 872). They further state that the site is in a highly sustainable location, and there are no		

	technical or environmental constraints that would preclude the development of the site. Landowner and developer interest is confirmed. Homes can be delivered on site in the next 5 years, indeed within the first 5 years of the Plan. DWH query why ST31 has been included as a preferred development site when there are outstanding constraints on delivery, and suggest that ST12 is allocated as a suitable, viable and achievable additional or alternative development site.
Comment	One comment queries why ST31 continues to be promoted for development in preference to ST12; another, how access to the site would be achieved. Julian Sturdy notes that the removal of the site is likely to be received well by residents.

ST13: Land at Moor Lane_Copmanthorpe			
Total representations: 44	**Support: 40**	**Objections: 3**	**Comments: 1**
Key Issues Raised			
Support	A significant number of responses, including from Cllr David Carr, support the intention to return this proposed site to green belt, deleting it from the preferred list of development sites. Commonly these refer to the level of development proposed bringing about an unwelcome change to the character of the village and that Copmanthorpe's services/amenities would be overburdened by additional demand. Those who support the removal of ST13 from the preferred list of sites generally also support the proposed allocations for Copmanthorpe set out in the Preferred Sites document.		
Objection	Shepherd Group Properties strongly objects to the deletion of ST13, submitting evidence base to respond to the Council's concerns – they argue that this shows the site is suitable, available and viable. Site can be accessed safely - concerns regarding access not previously raised as a showstopper. Consider PSC conclusion unfounded. ST13 is visually and physically well related to the urban area and development would not have an adverse impact on open countryside.		
Comment	Queries access arrangements to the site		

Deleted ST16: Terry's – see comments re ST16 above

ST18: Monks Cross North			
Total representations: 2	**Support: 2**	**Objections:**	**Comments:**
Key Issues Raised			
Support	Both Strensall with Towthorpe Parish Council and Huntington and New Earswick Cllrs support the removal of this site for employment development. Note that Huntington and New Earswick Cllrs consider the site has potential as housing development to accommodate a 'fair share of housing growth.'		
Objection	n/a		
Comment	n/a		

ST21: York Designer Outlet			
Total representations: 2	**Support: 1**	**Objections: 1**	**Comments:**
Key Issues Raised			
Support	Comment notes that the removal of the site will help protect Fulford Community Orchard, a much valued local facility.		
Objection	York Designer Outlet support the removal of the Designer outlet from the green belt, but strongly object to the removal of the allocation. Deletion of the allocation fails to recognise the importance of the YDO which provides 1,500 full and part time jobs and is one of the largest employers in the area. The deletion fails to acknowledge that without an allocation on the Site or an acknowledgement of its importance in the Local Plan, the future of the YDO as a driver of sustainable economic growth in York remains uncertain. Rep states that the site should be reinstated as a Strategic Economic development site rather than a Strategic Leisure Location.		
Comment	n/a		

ST25: South of Designer Outlet			
Total representations: 2	**Support: 1**	**Objections: n/a**	**Comments: 1**
Key Issues Raised			
Support	Comment notes that the removal of the site will help protect Fulford Community Orchard, a much valued local facility.		
Objection	n/a		
Comment	Mc Arthur Glen's aspiration for the land south of the YDO is to support the additional development on the site by providing an opportunity for additional car parking/enhanced park and ride facilities. They do not object to the removal of the Strategic Site for Employment, but request that the Local Plan recognises the important role that this Green Belt site has in providing an opportunity for Park and ride facilities, an appropriate use in the Green Belt.		

ST29: Land at Boroughbridge Road			
Total representations: 14	**Support: 13**	**Objections: 1**	**Comments:**
Key Issues Raised			
Support	Amongst others, Nether Poppleton Parish Council, Upper Poppleton Parish Council, Rufforth and Knapton Parish Council, Rufforth and Knapton Neighbourhood Planning Group, and York (Trenchard) Residents Company Ltd support the removal of the site on the grounds of: its role in preserving the historic character and setting of York and neighbouring villages; potential loss of green belt land; potential loss of agricultural land (Grade 2); impact of additional traffic on A59, noting cumulative impact with ST1 and ST2. Site is also stated to be within EA Groundwater Protection Zone 1.		
Objection	Cobalt Builders state that site should be reinstated as a housing allocation since it is not subject to environmental/amenity constraints and does not contribute to green belt purposes (comment states that		

	CYC's green belt assessment work is flawed).
Comment	n/a
ST29: General Area comments for Area 5	
Total representations: 23	**Support: 1** / **Objections: 6** / **Comments: 17**
Key Issues Raised	
Support	n/a
Objection	General concern for the large amount of housing in this area of York principally as a result of ST1/ST2/ST19 and H57. There are also concerns for; increased traffic inadequate drainage and lack of infrastructure and services.
Comment	Comments reflect objections above, namely that the large amount of housing in this area of York would impact on traffic, drainage and infrastructure/services.

ST30: Land north of Stockton Road			
Total representations: 10	**Support: 4**	**Objections: 5**	**Comments: 1**
Key Issues Raised			
Support	Support for the site's proposed de-allocation, including from Heworth Without Parish Council, acknowledges the site's green belt status and role of this 'green wedge' in preserving the historic character and setting of York. Concerns around impact of development on infrastructure are also noted.		
Objection	Linden Homes (North), Miller Homes and Persimmon Homes consider the site should be allocated for housing development; it is available, suitable and achievable and serves no or limited green belt purpose.		
Comment	Comment asks that land to the west of Christ Church is incorporated within the ownership and setting of the Church itself.		

Deleted General Housing/Employment Allocations

GT1 Land at Moor Lane_Rufforth
GT2 Acres Farm_Naburn
H2a Land at Racecourse_Tadcaster Road
H2b_Land at Cherry Lane
H6 Land r/o The Square
H9 Land off Askham Lane
H11 Land at Frederick House_Fulford Road
H12 Land r/o Stockton Lane
H19 Land at Mill Mount
H23 Grove House EPH
H25 Heworth Green North
H26 Land at Dauby Lane_Elvington
H27 Land at The Brecks
H28 Land north of North Lane_Wheldrake
H30 Land south of Strensall Village
H33 Water Tower Lane_Dunnington
H34 Land north of Church Lane_Skelton
H35 Land at Intake Lane_Dunnington
H37 Land at Greystones Court_Haxby
H40 West Fields_Copmanthorpe
H48 Haxby Hall EPH
H50 Land at Malton Road
E1 Hungate
E4 Land at Layerthorpe/James Street
E7 Wheldrake Industrial Estate
E15 Land at Hull Road
E16 Poppleton Garden Centre

Deleted GT1: Land at Moor Lane, Rufforth			
Total representations: 14	**Support: 13**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Support for the site's removal from the Plan, including from Rufforth and Knapton Parish Council and Rufforth and Knapton Neighbourhood Planning Group, given lack of accessible amenities and impact on the green belt.		
Objection	York Travellers Trust object to the site's removal ahead of the completion of the Gypsy and Traveller Accommodation Assessment.		
Comment	n/a		

Deleted GT2: Acres Farm Naburn			
Total representations: 3	**Support: 2**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Fulford Parish Council supports the site's removal from the Plan; development would be contrary to green belt purposes.		
Objection	York Travellers Trust object to the site's removal ahead of the completion of the Gypsy and Traveller Accommodation Assessment.		
Comment	n/a		

Deleted H2a: Land at Racecouse_Tadcaster Road			
Total representations: 3	**Support: 3**	**Objections: 0**	**Comments: 0**
Key Issues Raised			
Support	Support the removal of a proposed development at this site given impact on traffic and historic character (includes support from Dringhouses and Woodthorpe Parish Cllrs).		
Objection	n/a		
Comment	n/a		

Deleted H2b: Land at Cherry Lane			
Total representations: 2	**Support: 1**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Support for the site's removal from the plan given its potential to impact on one of the City's main approaches/prime attractions (Racecourse)		
Objection	The prospective developer (Shepherd Homes) objects to the site's		

Deleted H2b: Land at Cherry Lane	
	deletion as they consider it a deliverable and sustainable small site able to feed into the short-term housing supply.
Comment	n/a

Deleted H6: Land r/o The Square – see comments re H6 above

Deleted H9: Land off Askham Lane			
Total representations: 3	**Support: 2**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	The allocation of this site would have caused issues with, poor drainage, lack of facilities, loss of views and loss of a buffer between the bypass and the built up area. (Save Acomb Moor Campaign)		
Objection	Supports allocation of H9 for development (in association with ALT site submitted) (York Diocesan Board of Finance)		
Comment	n/a		

Deleted H11: Land at Frederick House_Fulford Road – no comments received

Deleted H12: Land r/o Stockton Lane			
Total representations: 3	**Support: 1**	**Objections: 2**	**Comments: 0**
Key Issues Raised			
Support	Support for the site's removal on grounds of potential to increase congestion on surrounding roads		
Objection	Developers/landowner query the Council's stated transport access issues, stating that access to the site is not constrained and the full capacity of the site can be delivered. Planning Application/Transport Assessment is currently being prepared. They consider that the site should be re-examined and re-instated as a housing allocation.		
Comment	n/a		

Deleted H19: Land at Mill Mount – no comments received

Deleted H23: Grove House EPH			
Total representations: 2	**Support: 0**	**Objections: 1**	**Comments: 1**
Key Issues Raised			

Deleted H23: Grove House EPH	
Support	n/a
Objection	Why is Grove House deleted when it is being marketed ?
Comment	Grove House, Penleys Grove Street. Fmr Care House, now closed. Executive agreed that this site would be sold for re-development with the capital receipt used to further the objectives of the Programme. The site has been marketed and Executive in September 2016 will be asked to accept the best offer, which is for General Housing development. You will need to decide how this site is represented in the Draft Local Plan, if at all (CYC Adult Social Care)

Deleted H25: Heworth Green North			
Total representations: 1	**Support: 0**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	n/a		
Objection	Tiger Developments, on behalf of the landowner, propose the reinstatement of the site as a designated residential and mixed-use development site within the Council's Local Plan. The site represents an available vacant brownfield site in a suitable location within walking distance to York City Centre. The site has been deleted due to concerns over flooding and issues of deliverability/willingness of the landowner. However, upon review the site is not located within Flood Zone 3 and only partially located within Flood Zone 2. Furthermore, the landowner has already commenced pre-application discussions with the Council over the potential redevelopment of the site, demonstrating a willingness to see the site developed. The site is considered suitable for redevelopment including residential led mixed-use development, hotel, student accommodation or retail.		
Comment	n/a		

Deleted H26: Land at Dauby Lane_Elvington			
Total representations: 19	**Support: 2**	**Objections: 16**	**Comments: 1**
Key Issues Raised			
Support	This site is not the logical option for housing.		
Objection	Objectors consider H26 has greater development potential than H39, including Elvington Parish Council. Broad objections relate to the site's potential to: provide a mix of housing type to meet local need; deliver access direct from Elvington Lane; enable easy access to local amenities.		

Deleted H26: Land at Dauby Lane_Elvington	
	Linden Homes objects to proposed deletion of H26. The site was assessed as part of CYCs rigorous site selection methodology in previous draft Local Plan documents and CYC must at the time have satisfied themselves that the site is available, suitable and achievable at the time when the site is intended to deliver homes. CYC must accept that the site is a proposed housing allocation in the preferred options and it serves no or limited green belt purpose. The site is contained visually and physically and lies at the heart of the settlement. There is no constraint to the development of the site and as such should be allocated for housing.
Comment	Village sites should be protected from losing green belt.

Deleted H27: Land at The Brecks			
Total representations: 76	**Support: 72**	**Objections: 2**	**Comments: 2**
Key Issues Raised			
Support	Strensall with Towthorpe Parish Council agree that the site should be removed from the Plan. Those comment in support of the site's removal consider Strensall large enough already and question the capacity of local infrastructure (roads, sewerage, drainage, schools/shops/health provision) to accommodate new development. Potential harm to village character and green belt is also noted.		
Objection	Linden Homes objects to the site's removal on the following grounds: This site has consistently been excluded from draft green belt boundaries and CYC has confirmed on may occasions that it does not serve and green belt purposes. It is incorrect for CYC to rely on SoS and Inspector's conclusions in relation to the call-in Inquiry in discounting Brecks Lane as an allocation as this decision was made in the context of the site being situated within the Green Belt and whether its development was justified by very special circumstances (and it was found that it was not). This 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 that would have no unacceptable environmental impacts or create unacceptable impacts upon amenity of new and existing residents. There are no insurmountable constraints and the site is deliverable within 5 years. The OAHN for York is not robust and is inadequate to meet need and demand within the Housing Market Area.		

Deleted H27: Land at The Brecks	
	CYC should therefore allocate additional land to meet housing needs.
Comment	Comment notes the potential of the site to deliver more affordable homes for younger people.

Deleted H28: Land north of North Lane_Wheldrake			
Total representations: 7	**Support: 5**	**Objections: 1**	**Comments: 1**
Key Issues Raised			
Support	Those supporting the site's removal from the plan do so principally on the grounds that the site is currently Greenfield/ draft green belt and would result in the loss of natural open space. Further access issues and highway safety concerns have been raised. Drainage/sewerage is noted as being a problem in the North Lane area.		
Objection	The prospective developer (Linden Homes) objects to the site's proposed deletion. They consider that the site serves no (or limited) green belt purpose, and that (in response to particular issues raised in PSC, 2016) there are two available vehicular access points to serve the site. On this basis there is no constraint to development and as such it should be allocated for housing.		
Comment	Village sites should be protected from losing green belt		

Deleted H30: Land south of Strensall Village			
Total representations: 78	**Support: 72**	**Objections: 5**	**Comments: 1**
Key Issues Raised			
Support	Strensall with Towthorpe Parish Council agree that the site should be removed from the Plan. Those comment in support of the site's removal consider Strensall large enough already and question the capacity of local infrastructure (roads, sewerage, drainage, schools/shops/health provision) to accommodate new development. Potential harm to village character and green belt is also noted.		
Objection	Shirethorn Ltd seeks the allocation of the site - **Land at South of the Village, Strensall (part)** - for housing development. The site was part of a larger area of land proposed for housing in the Preferred Options Local Plan 2013. From the Council's methodology it is clear therefore that the site has been run through a detailed suitability assessment process and has been judged to be in a sustainable location, relatively unconstrained and suitable for development. The revised access design provides an acceptable junction with The Village and is of a sufficient standard to serve up to 25 dwellings, thus is more than sufficient to serve a development of 11 dwellings. Overall the proposal		

Deleted H30: Land south of Strensall Village	
	satisfies local and national planning policy requirements and in the absence of a 5-year land supply there is a need to allocate sites such as the objection site (H30 (part)) that can be brought forward quickly to address the significant underprovision in housing supply across the plan period and, more particularly in the first 5 years of the plan.
Comment	Comment notes the potential of the site to deliver more affordable homes for younger people.

Deleted H33: Water Tower Lane_Dunnington			
Total representations: 15	**Support: 15**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Dunnington Parish Council supports the site's removal from the Plan: Eastfield Lane forms a clear and well defined boundary for the northern edge of the village, and provides a significant visual amenity as one enters the village. This land is part of the York Moraine and is currently productive agricultural land within the proposed Green Belt. Inclusion of this land for development would compromise defensible Green Belt boundaries. Any additional housing in this location would potentially make the already precarious surface water drainage issue for the village much worse. The development of this site would impact the junction of Church Balk / Eastfield Lane, which is already problematic Others commenting in support of the site's removal note the impact of development on village character, visual amenity and local infrastructure. Impact on the York Moraine is also a concern.		
Objection	Yorvik Homes consider the site appropriate for development - Land to the east of Church Balk was previously allocated for housing development within both the York Local Plan Preferred Options (June 2013) and the Local Plan Publication Draft (September 2014), on the basis that it offered a sustainable location for new housing development. The Site is not significantly constrained, it is available now and there is realistic prospect that housing will be delivered within the first five years of the plan period. Site is within walking distance of an existing primary school. The delivery of the site does not rely on the location (sic) of an existing business and access from Church Balk can be facilitated without significant improvements to the highway. Do not agree that the creation of defensible Green Belt boundaries will be difficult for this site. The boundaries of the site that are not already fully enclosed by existing housing are considered to be clear and defined by physical features that a recognisable and likely to be permanent in accordance with the criteria of paragraph 85 of the NPPF. The proposed allocation is not considered to impact on the York Moraine or the historic setting of the village as there are other examples of development along the Moraine, most notably on the western side of Church Balk. This is acknowledged in the conservation appraisal for Dunnington. The appraisal does not make any reference to the York Moraine contributing to the historic character and setting of the village		
Comment	n/a		

Deleted H34: Land north of Church Lane_Skelton			
Total representations: 6	**Support: 3**	**Objections: 3**	**Comments: 0**
Key Issues Raised			
Support	Skelton Parish Council, Skelton Village Action Group and Strensall with Towthorpe Parish Council support the site's removal from the Plan.		
Objection	Taylor Wimpey UK Ltd object to the deletion of this site for development as it is considered to be a deliverable and sustainable small site able to feed into the short-term housing supply. Transport and Access Appraisal show site can be accessed. Site should be removed from Green Belt - does not perform GB purposes. Consider Council's reasoning for deletion unsound		
Comment	n/a		

Deleted H35: Land at Intake Lane_Dunnington			
Total representations: 17	**Support: 14**	**Objections: 3**	**Comments: 0**
Key Issues Raised			
Support	Dunnington Parish Council supports the site's removal. Development would require access from Intake Lane, which is a narrow lane at this point. Any development on this site will probably precipitate development of the north side of Intake Lane, which would lose the rural character of the existing cluster of 4 houses further along the lane. The lane itself is of particular value to the village as it is used regularly for walking to Hagg Wood and the surrounding countryside as part of Route 66 Others commenting in support of the site's removal note the impact of development on village character, visual amenity and local infrastructure. Common Lane/Intake Lane noted as potential points of congestion. Yorvik Homes consider H33 a preferable development alternative to this site.		
Objection	Daniel Gath Homes/Linden Homes object to the proposed deletion. The site was assessed as part of CYCs rigorous site selection methodology in previous draft Local Plan documents and CYC must at the time have satisfied themselves that the site is available, suitable and achievable at the time when the site is intended to deliver homes. CYC must accept that the site is a proposed housing allocation in the preferred options and it serves no or limited green belt purpose. The Local Plan conversely gives a technical or planning reason or reasons - that are disputed. It is shown that developers have an option to acquire the H31 site, this option requires developers to provide access through to allow development of H35. We demonstrate that the layout plan prepared to guide development of H31 shows access from Eastland's Lane through the development and terminating on the southern boundary of that site. Also we demonstrate the developer of H35 controls all land up to the		

Deleted H35: Land at Intake Lane_Dunnington	
	southern boundary of H31. On this basis there is no access constraint to development of the site
Comment	n/a

Deleted H37: Land at Greystones Court_Haxby			
Total representations: 7	**Support: 6**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	General support for the site's removal from the emerging Plan, including from Haxby Town Council and Strensall with Towthorpe PC, given the likely impact of the scale of development on Haxby's road network.		
Objection	The Developer/landowner refute objections raised to the site's development, namely in relation to technical constraints identified (drainage, green belt and transport). They point to the Council's earlier support for the site as an allocation (Publication stage (Sept 2014). They consider that, as is the case with any new development, it will be required to address any infrastructure deficiencies through appropriate CIL payments at a future planning application stage. The site is promoted alongside a generous provision of enhanced, public open space (incorporating a woodland walk, balancing ponds and reed beds) which is proposed to be dedicated to York City Council/ or Haxby Town Council in perpetuity and to remain within the green belt.		
Comment	n/a		

Deleted H40: West Fields_Copmanthorpe			
Total representations: 38	**Support: 37**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Support for the site's removal given potential impact on local infrastructure and village character. Support for the land's designation as Green Belt. Sites included now reflect the emerging Copmanthorpe Neighbourhood Plan,.		
Objection	Site should be brought back into the Plan		
Comment	n/a		

Deleted H48: Haxby Hall EPH			
Total representations: 5	**Support: 4**	**Objections: 0**	**Comments: 1**
Key Issues Raised			
Support	Support for the site's removal from the Plan.		
Objection	n/a		
Comment	Potential to use site for car parking/small scale P+R if closure agreed?		

Deleted H50: Land at Malton Road			
Total representations: 2	**Support: 1**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	I fully agree with the removal of this site		
Objection	The site is no longer proposed as a preferred housing site. Our client strongly disagrees with the rejection of this site in the Preferred sites document. It is considered that the site represents suitable available and achievable housing. (Taylor Wimpey)		
Comment	n/a		

Deleted E1: Hungate – no comments received

Deleted E4: Land at Layerthorpe/James Street – no comments received

Deleted E7: Wheldrake Industrial Estate – no comments received

Deleted E15: Land at Hull Road – no comments received

Deleted E16: Poppleton Garden Centre – no comments received

Former Safeguarded Land

SF1
SF2
SF4
SF5
SF6
SF8
SF9
SF10
SF11
SF12
SF14
SF15

Deleted SF1			
Total representations: 25	**Support: 24**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Support for removal of SF1 on the grounds that the village is already at capacity and that, in principle, brownfield development should precede the release of further Greenfield sites.		
Objection	Object to the exclusion of Site SF1 as a development site or safeguarded land parcel. Consider that Land to South of Strensall is suitable, deliverable and viable within the plan period. Considered to have few technical constraints. Would be able to be brought forward in the short-term and deliver through plan period. Net developable considered to be 20ha. Consider that this site could meet the needs of Strensall in the short to long term to maintain village vitality. Considered as a logical southern extension to Strensall. Evidence submitted includes a vision document, SA and OAHN Assessment. (Shirethorn Ltd and Lovel Developments)		
Comment	n/a		

Deleted SF4			
Total representations: 4	**Support: 3**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Amongst others, Haxby Town Council support the removal of SF4 which would have unduly impacted on congestion.		
Objection	Linden Homes considers that the site should be allocated as safeguarded land along with a range of other choices to ensure the green belt boundary will not need to be altered at the end of the Plan period. As CYC have previously proposed to allocate this site they must have found it does not need to be kept permanently open. To make the Plan sound CYC should also reintroduce a safeguarded land policy.		
Comment	n/a		

Deleted SF5			
Total representations: 1	**Support: 0**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	n/a		
Objection	Developer request site's allocation for housing development. The site continues to represent a viable and deliverable housing site (approx 350 units), has a willing landowner and would contribute to housing delivery within the first 5 years of the Plan. Rep points to significant undersupply and lack of brownfield land as precursors to the Plan considering greenfield sites outside settlement limits, such as land within fmr SF5 site		
Comment	n/a		

Deleted SF8			
Total representations: 4	**Support: 3**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Support for removal of SF8		
Objection	Northminster Ltd considers the allocation important for the future expansion of the business park. The current site is successful due to, location, security, attractive landscaping and availability of both lease hold and virtual free hold opportunities.		
Comment	n/a		

Deleted SF9			
Total representations: 1	**Support: 1**	**Objections: 0**	**Comments: 0**
Key Issues Raised			
Support	Support for the removal of SF9		
Objection	n/a		
Comment	n/a		

Deleted SF10			
Total representations: 2	**Support: 0**	**Objections: 2**	**Comments: 0**
Key Issues Raised			
Support	n/a		
Objection	Barratt and David Wilson Homes object to the deletion of fomer safeguarded land, and its rejection as a potential housing allocation. The site is deliverable and available now and is under the control of a national housebuilder. The site can be considered achievable as new homes can be delivered on the site within the next 5 years and within the first 5 years of the Local Plan. There are no technical or environmental (built or natural) constraints which would preclude the development of the site.		
Comment	n/a		

Deleted SF11			
Total representations: 1	**Support: 0**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	n/a		
Objection	Developer/Landowner object to the site's removal from the Plan: Proposals have the potential to provide a high quality residential development of 88 homes, alongside the delivery of public open space and associated infrastructure. The site will provide the opportunity to help meet York's current and future housing needs. The site is deliverable and available now and is under the control of a national housebuilder . The site can be considered achievable as new homes can be delivered on the site within the next 5 years and within the first 5 years of the Local Plan. There are no technical or environmental (built or natural) constraints which would preclude the development of the site. Further, the Council should reconsider the highly risky strategy of not providing safeguarded		
Comment	n/a		

Deleted SF12			
Total representations: 79	**Support: 78**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Significant level of support for the removal of SF12, given its proximity to Askham Bog SSSI, including from Natural England, Yorkshire Wildlife Trust and Dringhouses and Woodthorpe Parish Cllrs, Further comments note potential for detrimental impact to local infrastructure, amenity and green belt.		
Objection	Barwood Strategic Land notes that CYC previously supported the principle of development at Moor Lane as an allocation and latterly as a safeguarded site. The site is in a highly sustainable location with excellent accessibility to local facilities and York city centre. Positive engagement has been carried out with key stakeholders such as Natural England and Yorkshire Wildlife Trust to understand how net environmental benefits could be gained. Site is surrounded by strong physical boundaries ensuring a defensible green belt boundary can be drawn to protect surrounding countryside. It is substantially unconstrained in terms of on-site environmental and technical considerations being deliverable immediately, capably of 1250 new homes, employment and associated social and community facilities and can deliver social economic and environmental benefits not least to local community, Askham Bog and operation of nearby P&R. It represents an appropriate extension to help meet urgent housing needs. The site is deliverable, achievable and viable. It is located within surrounding A64 and A1237 road corridors and the wider strategic Green Belt function will not be materially affected. Also offers an excellent opportunity to provide a new, strong defensible boundary to the green belt.		
Comment			

Deleted SF14			
Total representations: 37	**Support: 37**	**Objections: 0**	**Comments: 0**
Key Issues Raised			
Support	Amongst others, Earswick Parish Council supports the removal of SF14. They comment that this is in line with the majority of Earswick residents that responded to resident's surveys as part of Earswick NP. There should be no green belt development in the parish boundary. Further comments note the potential for development to unduly impact on local infrastructure and the historic character and setting of the city.		
Objection	n/a		
Comment	n/a		

Deleted SF15			
Total representations: 2	**Support: 1**	**Objections: 1**	**Comments: 0**
Key Issues Raised			
Support	Support for the removal of SF15 from Escrick Parish Council, which was felt to be disproportionate to both Escrick and other villages' allocations, poorly served by /accessible to York's infrastructure and services and detrimental to the character of Escrick.		
Objection	Objection received from the developer (Linden Homes). Site should be allocated as a housing site (noting new boundary proposed to incorporate land to the east for biodiversity enhancement/amenity/ drainage area as needed), on the following grounds: well positioned site to immediate north of existing built form of Escrick; offers a highly sustainable opportunity - the site is well served by a range of local services and facilities to meet day to day needs and also benefits from frequent bus services along the A19 to York and Selby. Additional buffering could be formed to screen the site further from the surrounding countryside. Previous representations made in respect of highways issues were made in July 2014 that demonstrated that the junction between the A19 and New Road has sufficient capacity to deal with additional residents, connectivity of the site to the existing built form can be improved for pedestrians/cyclists through use of an existing track to west of the site and through a potential new footpath/cycleway at sites south-west edge. The developer would agree to improvements at the junction of Skipwith Road and A19. Pedestrian/cycle links can be improved. Note that surface water drainage solution and provision of an additional biodiversity area at land west of Blanshard's Wood would enhance local bio-diversity.. Any future development would clearly have to pay due regard to the Conservation Area. A comprehensive Landscape Report relating to this site and surrounds has been submitted. Further, in terms of the Council's Duty to Cooperate re Selby, the site provides land for housing within an area appropriate to Selby's spatial strategy.		
Comment	n/a		

6.0 Comments on the Plan's wider themes

6.1 It is important to note that the Preferred Sites consultation document is not a full Local Plan. Consultees were made aware that responses to this consultation should only relate to the sites and / or information set out in the Preferred Sites (2016) Consultation document or associated technical documents, and that further consultation on a Publication Local Plan would take place at a later date. However, acknowledging that respondents commented more widely on Local Plan 'themes', and that these comments could help direct policy choices, our summary aims to capture responses in the widest sense. It should be noted that the views expressed below are of those who submitted representations as part of the consultation and not necessarily the views of City of York Council.

6.2 Comments are summarised against the following general themes:

- Duration of the Plan, Green Belt and Safeguarded Land (Principle of Green Belt, Flexible land supply, Green Belt Appraisal)
- Housing Growth (including Housing Delivery and the OAHN)
- Economic Growth
- Gypsies and Travellers
- Transport
- Infrastructure Delivery and viability
- Historic Environment
- Sustainable Design
- Environmental Quality
- Flooding and Drainage
- Healthcare
- Minerals and Waste (including Fracking)
- Natural Environment
- Open Space
- General Comments (General approach to Growth / Duty to co-operate / SA / Consultation process)

Duration of the Plan, Green Belt and Safeguarded Land

Principle of Green Belt

A significant number of respondents comment on their support for the principle of a Green Belt around York. Dunnington PC greatly welcome the establishment of an undisputable Green Belt around Dunnington, protecting the open and rural approach to the village. Strensall with Towthorpe PC note that once the boundary is set in an adopted Plan it will replace use of RSS policy in determining planning applications, and this is to be welcomed. Keep Earswick Rural Action Group supports the long term protection of green belt boundaries, beyond the end of the plan period to 2037. Rufforth and Knapton Neighbourhood Planning Group feel that the draft plan sets the correct balance between meeting future housing needs and protecting valuable green belt.

Amongst others, Natural England welcome the use of green belt principles to buffer

biodiversity from inappropriate development. While Yorkshire Wildlife Trust notes that a defined Green Belt will be very valuable for the City, it further comments that brownfield land can have higher value for biodiversity than land within the green belt, therefore there should not be an assumption that all Brownfield land needs to be developed, rather that a site by site approach is vital.

Housing trajectory and 5-year land supply

Comments raise the issue of the lack of, or the inability of the Plan to deliver, an up-to-date 5-year housing land supply. Shirethorn Ltd / Linden Homes North and Miller Homes / Taylor Wimpey / O'Neill Associates / Shirethorn Ltd & Lovel Developments (Yorkshire) Ltd / Linden Homes, Taylor Wimpey and Persimmon Homes / Avant Homes / Owners of Land West of Monks Cross North / Home Builders Federation

"In order to understand the build out trajectory rates of strategic sites the Council's assumptions regarding delivery rates/yr and likely site commencement is required. This is particularly important as a portion of the yield associated with the strategic housing allocations are assumed to be delivered beyond the Plan period." (Pilcher Homes Ltd). Further comments query the lack of a justified housing trajectory. Several ask that this reconsiders delivery rates, in particular on ST34 (Shepherd Group Properties / DPP Planning) ST1/ST5/H1 (O'Neill Associates) / York Central and Whinthorpe (JRHT/Jennifer Hubbard obo Private Landowner) / ST5 and ST15 (Linden Homes, Taylor Wimpey and Persimmon Homes) / ST5, ST14 and ST15 (Avant Homes and Owners of Land West of Monks Cross North). Also Henry Boot Developments.

On the issue of delivery rates, some respondents note that the Plan is relying on strategic housing allocations to satisfy the bulk of future housing growth. However a number of these sites require significant infrastructure investment and all are subject to long lead times which means the Councils expectations for delivery within the Plan period are unlikely to be realised. (Daniel Gath Homes/JRHT/Linden Homes Strategic Land/ Shirethorn Ltd & Lovel Developments (Yorkshire) Ltd/). In order to redress the year on year shortfall in housing completions, some comment that as many as possible small and medium sized sites are brought forward immediately to engage as wide a cross-section of the housebuilding industry as possible. (Jennifer Hubbard obo Private Landowner).

Green Belt/Safeguarded land and flexible land supply

The NPPF encourages local planning authorities to ensure Local Plans cover an appropriate period of a minimum of 15 years and longer where a review of Green Belt land is required. As such, respondents consider that it would be appropriate for York to follow protocol of neighbouring authorities and to progress their plan to similar longer time frames (20 years +)

The consultation document makes clear that some strategic allocations have the potential to build out beyond the end of the plan period, therefore there is no need to identify safeguarded land as long term development needs 'stretching well beyond the plan period' can be met without altering green belt boundaries at the end of the plan period.

A significant number of respondents support the removal of safeguarded land in principle, and the delivery of sufficient land to accommodate need on specific sites, which gives more certainty required for detailed negotiation and constructive community involvement (Escrick Parish Council/Earswick Parish Council/ Strensall with Towthorpe PC/York Green Party/CPRE/Julian Sturdy MP/Keep Earswick Rural Action Group/York Action Group Alliance)

Conversely, a significant number of respondents consider that this approach would not deliver a 'permanent' green belt within the definition of NPPF, and as such puts the Plan at risk of being found unsound at examination. Further, several respondents add that this reduces the Council's flexibility to respond to indigenous or inward investing companies that have unforeseen requirements for growth. *"Paragraph 83 of the National Planning Policy Framework is clear as to the approach to be taken in the identification of green belt boundaries and the timescales Planning Authorities should have in mind when undertaking this exercise for the first time. Any Local Plan which sets this advice aside without exceptional justification is at risk of being found unsound. A 20 year green belt – as is now envisaged - falls far short of the "life" we believe is expected in (very long established) national policy where a 20 year period before review is seen as a minimum." (Joseph Rowntree Housing Trust).* Several respondents raise similar points; that the plan should include sufficient flexibility to ensure that housing requirements are met and that Green Belt boundaries will not have to be altered at the end of the plan period:

- Several respondents question the permanence of a 20 year green belt and suggest that the Plan should provide sufficient flexibility and provide a permanent green belt by either reintroducing areas of safeguarded to meet development need beyond the plan period and/or allocating sufficient land to accommodate identified need. *"The 2013 Preferred Options Draft Local Plan sensibly included a reasonable amount of safeguarded land to ensure the proposed Green Belt Boundaries would remain permanent beyond the Plan period. Unfortunately, this approach appears to have been abandoned in the latest preferred sites consultation, which is a weakness of the document."* (Yorvik Homes). Comments received from the Home Builders Federation /Joseph Rowntree Housing Trust/ Yorvik Homes / Oakgate Group and Caddick Group / KCS Development / Linden Homes North and Miller Homes/Shepherd Group Properties Ltd / Persimmon Homes / Northminster Ltd/Pilcher Homes Ltd/Taylor Wimpey, Linden Homes & The Grimston Bar Development Consortium/Barratt and David Wilson Homes/William Birch and Sons/Taylor Wimpey/Daniel Gath Homes Ltd / Henry Boot Developments /O'Neill Associates/Linden Homes Strategic Land/Barwood Strategic Land II LLP/DPP Planning/Shirethorn Ltd & Lovel Developments (Yorkshire) Ltd/Linden Homes, Taylor Wimpey and Persimmon Homes/Rachel Maskell MP/Jennifer Hubbard obo Private Landowner/Avant Homes/Silvercrest Estate Limited/Owners of Land West of Monks Cross North/Barratt & David Wilson Homes
- Ryedale District Council would be particularly concerned if the city fails to deliver its housing requirements once the green belt boundary is established as this could lead to Ryedale facing pressure to meet the housing needs of the city in an uncoordinated, unplanned way and out with any existing agreement under the Duty to Co-operate;

- Harrogate Borough Council raises concern that the proposed approach runs counter to the advice received from Counsel and the Officer position in 2015, and represents a risk to the Plan being found unsound at Examination. Without identifying safeguarded land it is inevitable that a review of Green Belt boundaries will be necessary with the next review of the plan, or that CYC will seek to export development needs to neighbouring authorities;
- Hambleton District Council supports the approach of setting a 20 year Green Belt boundary as (in conjunction with sufficient identified sites to accommodate growth) it ensures the longer term development needs of the City of York can be met without placing pressure on areas in neighbouring authorities;

Brownfield first

The principle of a Plan which promotes brownfield development ahead of releasing Greenfield sites is supported by a number of respondents including Dunnington Parish Council / York Green Party / Julian Sturdy MP / Cllr Warters / York Action Group Alliance / Rachel Maskell MP /

Need for a full Green Belt appraisal

Some comments, including from Pilcher Homes Ltd, Daniel Gath Homes Ltd, Linden Homes Strategic Land and Persmmon Homes and several landowners, question the process the Council is undertaking in defining the green belt, and several respondents suggest a point of clarification: that green belt boundaries in York are being defined (or established) for the first time rather than (as comments suggest) the emerging Plan's approach which speaks from a position that assumes the Green Belt boundaries are fixed in an adopted plan and that any suggestion that sites should be allocated for development will result in land being taken out of the Green Belt. *"In effect, green belt has been seen as a residual policy – and still is. The current proposals to omit safeguarded land only serve to emphasise the flawed approach." JRHT.*

- Persimmon Homes questions the process taken by the Council whereby green belt boundaries are being set at the same time as land is proposed for allocation; there is a danger of green belt boundary conclusions being retrofitted to accommodate predetermined allocations.
- Pilcher Homes Ltd are critical of the Council's Green Belt evidence base, stating that it has not been sufficiently progressed to a robust and sound level - current evidence has focused on the historic landscape assessment and heritage impact appraisals, only one component of the 5 purposes identified in NPPF. A full GB assessment is required, to comprehensively assess parcels of land against the 5 purposes of Green Belt, and establish a clear framework/methodology for defining GB boundaries

General extent of the green belt

- One comment queries the approach to defining settlement boundaries, stating that the Plan's suggested approach (defining boundaries based on the current extent of development) is not expressly stated or justified; that, until the

Council have undertaken an assessment of the capacity of each settlement to accommodate development, it is not possible to justify which settlements should be regarded as washed over.

- Dunnington Parish Council - seeks retention of field opposite the Sports Club as a green wedge between the industrial estate and the residential part of the village which defines clearly the the southern boundary of the village. The open and rural aspect of one of the three main gateways into the village would be lost with development

- Several comments support the removal of proposed allocations to the west of Copmanthorpe, and the resultant green belt boundary which follows the village's western boundary.

- There is concern that altering Knapton's washed-over status could open the village up for further development.

- Defence Infrastructure Organisation requests that Queen Elizabeth Barracks and Towthorpe Lines are excluded from the green belt boundary.

- General support for removal of green belt allocation at Earswick.

- One comment suggests an alternative approach to the proposed inclusion of small incursions in the green belt; to locate a new settlement beyond the green belt in an adjacent authority.

Housing Growth

Housing Delivery

Ryedale District Council supports a position whereby York is committed to meeting its own housing requirements, with flexibility within the plan to meet housing requirements; the Council appreciates the use of a small sites windfall allowance as a consistent source of housing supply, with the caution that windfall use reduces flexibility if allocations do not deliver as anticipated.

Harrogate Borough Council questions the extent of flexibility/buffer on the residual housing requirement, and suggests that it may be appropriate to reconsider some or all of the 'removed' allocations.

East Riding of York Council strongly support the Plan's proposed approach whereby its full need for housing is accommodated within the City Council's administrative area, helping to promote a sustainable pattern of development.

Escrick Parish Council supports the Plan's approach to accommodating identified need for housing and employment land on specific sites, and for a duration sufficient to provide for a defensible green belt boundary, with built in flexibility in delivery.

Strategic Housing Market Assessment (SHMA) and Objectively Assessed Housing Need (OAHN)

There is some support for the approach taken by the SHMA to evidence housing need, including from Hambleton District Council, Ryedale District Council, Escrick Parish Council, :

- Hambleton District Council supports the conclusions of the housing need figure as identified through the SHMA, noting that it follows the same methodology as Hambleton DC's SHMA;
- Ryedale District Council supports the SHMA recognising some overlaps between the two authorities in terms of housing markets;

A significant number of respondents support the level of housing growth proposed, and feel that it better represents the City's characteristics than that published as part of Preferred Options in 2013 (1090 dwg p.a.). This view is particularly representative of comments from the general public and Parish Council's. The following further comments question whether CYC continue to overestimate housing need;

- *The Preferred Sites Consultation appears to be based on the approach that the Local Plan should meet assessed housing and employment needs in full whatever the environmental cost. FPC disagrees with such an approach which it considers is not in accordance with national policy.* (Fulford Parish Council)
- The overall target number of houses should be lower – it is still based on questionable assumptions regarding future economic and population growth. Question appropriateness of 10 year population trend, given short term impact of Brexit and likely slow down in university expansion. Target figures are wildly above anything seen in recent years. (York Green Party)
- Welcome the recognition that housing targets in previously aborted plan were inflated and unrealistic. However, the target to build 841 dwellings pa for next 20 years is still 33% more than the average completions (557) achieved over last 10 years. (CPRE)
- Housing growth figure at Preferred Option stage (1090 p.a.) was based on unrealistic assumptions on potential economic growth and job creation in York; I welcome the review of the evidence base which has pointed to a significantly lower figure. (Julian Sturdy MP)
- The methodology suggested by NPPF over-inflates housing need in York. Consider the actual growth for the city will experience over the next 15 years could adequately be met on brownfield land alone. Therefore would like to see unsuitable sites within Fulford & Heslington Ward removed entirely. (Cllr Aspden)
- Continue to maintain that methodology suggested by NPPF over-inflates housing need in York. Consider the actual growth for the city will experience over the next 15 years could adequately be met on brownfield land alone. Therefore would like to see unsuitable sites within Heworth Without Ward removed entirely. (Cllr Ayre)
- A number of comments, including from Huntington and New Earswick Liberal Democrat Cllrs, refer to the need to review housing need in light of Brexit and likely reduced international migration.

'Make-it York' comment that the level of housing allocation within the plan supports the level of forecast growth, and that an appropriate mix of size and tenure is provided for. Failure to deliver sufficient housing in the right locations over the plan period could severely constrain economic growth. (Make-it York)

Where objections are raised, these commonly relate to underestimated housing need and the assumptions/projections used to establish this figure (need is under-estimated whilst supply over-estimated). Issues around supply raise the common themes of persistent under-delivery against the housing target, the overplayed influence of students in the city; lack of consistency with City's economic ambitions or those of the LEP, unrealistic density assumptions and failure to address affordable housing need. Many others raise affordable housing as a key priority for the City, only achievable through higher rates of housing delivery. A brief summary is provided below:

- Harrogate Borough Council notes the different assumptions used for the purpose of defining objectively assessed need and projections beyond the plan period. There is potential to have underestimated requirement beyond the plan period.
- Home Builders Federation questions the SHMA's assumptions re household projects and student numbers; overall, HBF does not consider 841 dwellings/annum to be fully justified and the approach is likely to be found unsound at examination. Assessment shows that this figure with a market signals uplift should be around 1000 dwellings per annum. and may need to be higher to take account of economic ambitions of the LEP;
- Joseph Rowntree Housing Trust objects to the housing need figure identified; instead, they support a higher need figure based on applying an uplift to the 2014 Plan target (1090/annum) to reflect updated projections; (also Northminster Ltd)
- York and North Yorkshire Chamber/York Property Forum raise concern that the Council appear to be aiming to provide the minimum level of housing indicated by available evidence. The chamber considers this to be the wrong approach for a variety of reasons: proposed annual housing requirement of 841 dwg/annum is too low. It does not reflect the 2014 SNPP (898 dwg/annum); completions figures wrongly include student accommodation; lack of flexibility in housing delivery, noting likely underperformance of larger strategic sites;
- There is an inadequate assessment of housing need in the strategic Housing Market Assessment (SHMA). Flaws in the calculation of the City's housing requirement does not take into account market signals or the need to apply an uplift to meet needs of those households requiring affordable homes. The OAHN does not accord with guidance set out in the National Planning Policy Framework and Planning Practice Guidance. The Local Plan will not provide enough homes to meet the projected population growth based on current trends. Additional housing sites will be required. the housing need figures proposed in the Local Plan are significantly below the figure identified in the previous local plan process. York performs poorly against rates of development and affordability. (Taylor Wimpey UK Ltd);
- The appellant's own analysis of objectively assessed housing need (OAHN) finds that the OAHN for the city of York is in the range of 1,125 dpa and 1,255

dpa. The OAHN of 1,125 dwellings per annum is used in the representor's assessment of 5 year land supply that gives a five year supply of 2.08 years. The scale of the deficit in land supply identified by the 5 year calculation is significant. (Shirethorn Ltd);

- 898 dpa housing requirement identified in the SHMA addendum should be used as a minimum figure for determining the OAHN. Persistent under delivery in housing should necessitate incorporating considerable flexibility in the Plan which is currently not demonstrated. Disagree that student housing completions should be included in the supply of housing because it is not demonstrated that students form part of OAHN nor that student housing contributes to meeting housing requirement. (Shepherd Homes)
- CYC's projected annual housing need uses out of date and underestimated population projections (2012 rather than 2014 base date. Such an approach which would not be considered 'sound' at examination. Further, the constrained nature of settlements would mean that opportunities for windfall allowance are minimal. Their inclusion renders the plan unsound. (Private Landowner - [redacted]
- There are a number of deficiencies in the City of York SHMA, the housing need should be between 1125 and 1420 dwellings per annum. If long term migration trends were to continue this would justify a higher OAHN of 1,420 dwellings per annum. (Linden Homes North and Miller Homes)
- Consider that the OAHN is deficient and underestimates housing need. Issue exacerbated by over estimation of site delivery in Strategic Sites. Suggested OAHN should be between 1125 dpa -1420 dpa. Consider that the Plan is unsound using 841 dpa. Current SHMA downplays robustness of 2014-based SNPP, adjustments to headship rates have been conflated with the uplift for market signals and there is no uplift or consideration for affordable housing; Fails NPPF and NPPG guidance. (Shepherd Group Properties Ltd)
- The assessment of the OAN felt wrong and, when we looked into it further, is wrong. It is clear that the Publication Draft severely underestimates the housing requirement in its OAN and is too optimistic about the rate of delivery from allocated sites. (Persimmon Homes)
- The assessment of housing need and the number of homes required over the 2012-2032 period that has been derived from the Council's assessment of housing need does not (i) reflect the duty to co-operate; (ii) meet the household growth scenarios presented in the SHMA addendum (which itself does not reflect DCLG 2014-based household projections); (iii) reflect York's economic growth aspirations (Council's Economic Growth Strategy/LCR LEP and YNY+ER LEP. (Pilcher Homes Ltd)
- Annual housing provision should be at least 950 dwg p.a. to 2037 (Diocese of West Yorkshire (and Yorkshire Dales (Landowner))
- Annual housing provision should be at least 950 dwg p.a. to 2037 (Private Landowners)
- Object to the Council's OAHN and consider that a more appropriate annual range would be 920-1070 dwgs. Our client has instructed Barton WIllmore to undertake a Technical Review of the Council's SHMA to consider the methodology that has been utilised in formulating the objectively assessed need. (Barratt and David Wilson Homes)
- The OAN for housing and the housing supply as a currently assessed by the

council fail to follow national guidance. The OAN has been under-estimated and the supply over-estimated. In consequence, the failure to identify safeguarded land puts the Plan at risk. (Taylor Wimpey, Linden Homes & The Grimston Bar Development Consortium)

- The Objective Assessment of Housing Need [OAHN] does not accord with guidance set out in the National Planning Policy Framework [Framework] and Planning Practice Guidance [Practice Guidance]; it does not incorporate the latest projections on household formations and jobs growth. In producing this response, we are mindful of the housing requirement work undertaken by NLP and are supportive of its findings that conclude the housing requirement for the plan period should be at least 1,125 dwellings per annum. (Taylor Wimpey)
- The emerging plan under estimates future housing need. The strategy for satisfying objectively assessed need is flawed. The plan is relying on strategic housing allocations to satisfy the bulk of future housing growth. These sites require significant infrastructure investment and all are subject to long lead times which means the Councils expectations for delivery within the Plan period are unlikely to be realised. Additional land should be identified for future needs. (Daniel Gath Homes Ltd)
- Questions whether the 841 OAN figure is an appropriate basis on which to plan for future housing requirements particularly in the light of the 2014 based Household Projections which indicated a higher figure of 898 dpa is required. Would also question the very low Market Signals adjustment applied by G L Hearn in calculating their 841dpa figure in what is one of the strongest housing markets in Yorkshire. (Henry Boot Developments).
- The council should be making provision for at least 950 dwellings per year and therefore the Local Plan should allocate 19,000 dwellings. [redacted]
- Objects to annual housing target and housing requirement on the following grounds: NLP's objective assessment of housing need suggests a figure of 1,125 dwellings/annum (or some 1,255 allowing for adjustment to meet affordable housing need) against a Plan target of 840/annum; completions figure wrongly includes student accommodation; it is inappropriate to consider windfall allowance across the Plan period - guidance suggests it can be included as part of 5 year housing supply; supply assumptions are based on overinflated and unrealistic development densities; it is unclear how GL Hearn has generated a much lower level of population growth (and by extension housing need) based on a long-term migration trend; despite market signals in York indicating signs of considerable stress and un-affordability, the SHMA fails to address the supply uplift needed to help address demand; the SHMA presents a suppressed picture of likely economic growth, drawing upon outdated economic forecasts; failure to address affordable housing needs - having identified an affordable housing need, the SHMA does not then indicate how that would be specifically addressed as part of its conclusion on OAHN. The Council needs to allocate land for a further 8,235 new dwellings in order to meet housing demand for the period 2012-2032. (O'Neill Associates obo private landowner)
- The Council's calculated housing need figure of 841 is far too low. It does not take account of higher SNPP figures released in 2014. NLP's assessment calculates that an OAN of at least 1,125 dwellings/annum is more accurate,

with a figure of 1,255/annum being appropriate if affordable housing needs are to be properly addressed. Depending on migration trends, this could be as high as 1,420/annum. If 1,125 annual figure is considered reasonable, the Council's identified supply for the period to 2032 falls short by 1,751 dwellings. It is our firm view that the situation presented in the PSC document is wholly inadequate in terms of the components of housing supply and the housing need figure. (Linden Homes Strategic Land)

- LPPS document sets out in section 2.2 that 'the SHMA draws the conclusion on the overall full objectively assessed need....to be 841 dwellings pa' This has been reviewed and there are 3 main flaws (1) The SHMA 2016 is not based on the latest 2014 based population and household projections with latest projections now pointing to a higher starting point. (2) Market signals adjustment of 1% is trivial and will not improve affordability. (3) OAN is not adjusted to take account of significant affordable housing requirement of 627 (net) pa. Analysis shows that a starting point of 890 homes pa (extracted straight from CYC work) should be used with a 15% market signals adjustment with a OAN of 1,020 dpa for period 2012-32. (Barwood Strategic Land II)
- Alternative OAHN evidence base submitted suggests 1,255 dpa to meet market and affordable need because current SHMA downplays robustness of 2014-based SNPP, adjustments to headship rates have been conflated with the uplift for market signals and there is no uplift or consideration for affordable housing; Fails NPPF and NPPG guidance. Windfalls should not be included as a component of the plan. Disagree that student housing completions should be included in the supply of housing because it is not demonstrated that students form part of OAHN nor that student housing contributes to meeting housing requirement; therefore number of completions calculated too high since 2012. (SBO Lands Ltd)
- Consider that the OAHN is deficient and underestimates housing need. Issue exacerbated by over estimation of site delivery in Strategic Sites. Suggested OAHN should be between 1125 dpa -1420 dpa. Consider that the Plan is unsound using 841 dpa. Current SHMA downplays robustness of 2014-based SNPP, adjustments to headship rates have been conflated with the uplift for market signals and there is no uplift or consideration for affordable housing; Fails NPPF and NPPG guidance. (DPP Planning)
- The OAHN of 841 is insufficient to meet the full housing needs of the city and its housing market area. Consider the Council's OAHN flawed because demographic modelling downplays the robustness of the 2014-base SNPP, adjustments to headship rates have been conflated with the uplift for market signals which needs to be addressed and no uplift applied to deliver affordable housing need. Consider that a OAHN of 1,125 - 1,255 dpa is more appropriate to meet full need because takes account of the aforementioned issues. Alternative OAHN assessment submitted. (Shirethorn Ltd & Lovel Developments (Yorkshire) Ltd)
- Strongly object to SHMA evidence. Consider that the OAHN is deficient and underestimates housing need. Issue exacerbated by over estimation of site delivery in Strategic Sites. Suggested OAHN should be between 1255 dpa. Consider that the Plan is unsound using 841 dpa. Current SHMA downplays robustness of 2014-based SNPP, adjustments to headship rates have been conflated with the uplift for market signals and there is no uplift or

consideration for affordable housing; Fails NPPF and NPPG guidance. Support windfalls post 5 years but not current figure. Significant shortage of housing in first 5 years. (Linden Homes, Taylor Wimpey and Persimmon Homes)

- Having assessed both SHMA documents in detail there are significant concerns with regard to the way in which the OAN [objectively assessed need] has been calculated. The current figure of 841 dpa does not represent the full OAN for York and is a significant underestimation of the housing need likely to be generated across the emerging Local Plan period. The latest 2014 SNPPs for the City of York suggest a demographic starting point of 898 dpa. GL Hearn consider these latest estimates over-estimate the City's population because of issues relating to student numbers. However, account must also be taken of the latest 2015 MYPE which suggests that the population of the City of York is above the level projected by the 2014 SNPPs and significantly above the level projected by GL Hearn's preferred 10 Year Migration Trend projection. It is therefore considered unsound that the Council are proposing a full OAN below the latest official population projections. (Gladman Developments)
- Note that the plans proposals for new housing indicates 10727 new homes between now and 2037. This equates to 510 per year over 21 years. The Census 2011 showed a total of 83552 households in York with an average growth rate of 9.4% since 2001. Plan represents 0.61% annual growth compared to 0.94% . Based on these details it would appear that 16500 homes by 2037 would be more realistic target. A shortfall of 5775 new homes would likely increase demand. (York Minster)
- The Council's most recent SHMA (June 2016) predates the most recent sub-national population projections. These demonstrate a higher population growth than suggested in the SHMA. There is a significant underestimate of housing need in York as a result. (Vernon Land Partnerships)
- There are issues with the methodology used and incorrect data has been used as the starting point for calculating the housing requirement for the City. The representor's client, therefore objects to the Council's objectively assessed need and considers that a more appropriate figure would range from 920 dwellings per annum to 1,070 dwellings per annum (Barratt Homes, David Wilson Homes and TW Fields
- The concluded position {on Objectively assessed housing need] is considered to be unjustified with particular reference to a number of gaps or inconsistencies in the methodology adopted in the SHMA. (JJ Gallagher Ltd)
- The OAN for housing and the housing supply as currently assessed by the Council fail to follow national guidance: the OAN has been under-estimated and the supply over-estimated. The risks to the soundness of the Plan are exacerbated by the significant reduction in the housing requirement as currently assessed. (Jennifer Hubbard obo Private Landowner)
- The emerging Local Plan net housing requirement of 841 dwellings per annum is significantly below that (1,090 dwellings per annum) within the previous consultation plan. The representor questions whether the evidence base exists for such a low figure, whether it meets the identified Objectively Assessed Need, whether it meets the economic aspirations for York and the Region as a whole and whether it truly reflects the aims and objectives of the NPPF. [redacted]

[redacted]

- The appellant's own analysis of objectively assessed housing need (OAHN) finds that the OAHN for the city of York is in the range of 1,125 dpa and 1,255 dpa.The OAHN of 1,125 dwellings per annum is used in the representor's assessment of 5 year land supply that gives a five year supply of 2.08 years. The scale of the deficit in land supply identified by the 5 year calculation is significant. (Yorvik Homes)
- OAHN set out does not accord with national guidance. The council have not produced a housing trajectory or detailed 5-year land supply position but current evidence indicated significant shortfall in first five years. The supply is overly reliant on windfalls which is high risk to the plan delivery; a lower figure should be included. The city's unmet housing need has not been addressed through the evidence base. Do not consider that the Preferred Sites document is robust and regard that the 2014 sub-national population projections to provide a more robust starting point. Consider that OAHN should be at least 1,125 dpa. (Avant Homes)
- the OAHN does not accord with guidance set out in NPPF and does not incorporate latest household formations and job growth projections. No trajectory or detailed assessment of the 5-year supply and is over reliant on windfalls. Concerns re cross-boundary housing issues and how Council has demonstrated DtC. Supportive of the approach taken by NLP which we understand forms part of their submission and concludes an OAHN and concludes an OAHN of at least 1125 pa. (KCS Developments)
- The OAHN does not accord with guidance set out in NPPF. It does not incorporate the latest projection on household formations and job growth. Need to identify what actions have been taken to deal with cross-boundary housing issues (DtC) . The 2016 SHMA addendum considered the 2014 SNPP but not the 2014 SNHP. The 2014 SNHP identify a higher demographic starting point starting point compared to their 2012 counterparts, nearly an additional 100dpa. York has a long history of under-delivery against housing targets. Supportive of the approach taken by NLP which we understand forms part of their submission and concludes an OAHN and concludes an OAHN of at least 1125 pa. (Redrow Homes and Linden Homes)
- 841 dpa is inadequate as OAHN and consider that the OAHN is inaccurate due to not being based upon latest 2014 SNHP nor 2014 SNPP;2014 based SNPP is higher and a more robust starting point for OAHN. However the projections still present a significant under estimation of the housing requirement in York because of depressed rates of household formation owning to historic land supply constraints and the lack of affordable market housing. Uplift of 25% should be applied to the 2014 SNHP to take account of market signals and affordability. An OAHN of 1134 dpa considered suitable. Should apply the 2014 SNHP post plan period to 2037 equating to annual figure of 800 dpa as opposed to 660 dpa. (Silvercrest Estate Limited)
- OAHN set out does not accord with national guidance. The council have not produced a housing trajectory or detailed 5-year land supply position but current evidence indicated significant shortfall in first five years. The supply is overly reliant on windfalls which is high risk to the plan delivery; a lower figure should be included. The city's unmet housing need has not been addressed through the evidence base. Do not consider that the Preferred Sites document is robust and regard that the 2014 sub-national population projections to

provide a more robust starting point. Also consider that the market signals and suppression of household formation rates should be separated in SHMA and that existing market signals uplift included is too low; consider that 20% uplift warranted. (Owners of Land West of Monks Cross North)

- The latest mid-year population estimates 2015 are showing a return to higher levels of population change. Economic forecasts data contained within the SHMA are out of date. The proposed response to acknowledged worsening trends in affordability and overcrowding is not justified or sound. There is clear steer from Development Plan examinations that a minimum of 10% market signals adjustment should be used. For the purposes of this review of the current SHMA it is considered the OAN for York sits within the range: 976 to 1064 dwgs per annum (reflecting reasonable and evidenced adjustments (10% to 20% to an acknowledged affordability issue). For the purpose of soundness the Council need to address the 2014 SNPP and 2014 SNHP implications, and be much clearer about the plan's aspirations for economic growth. The detail of this relationship would influence whether the OAN should be at the lower or higher end of the range expressed above. (Sandby York Ltd and Oakgate Caddick Group)

Economic Growth

Vision for Growth

The vision underpinning York's growth strategy is a common theme. There is significant concern raised that the Plan's previous strategy appears to have been altered, and is now one of restraint rather than growth (William Birch and Sons). Conversely, Save Acomb Moor campaign (and others) comment that the Plan's economic development targets are over ambitious; that these forecasts are driving housing demand and hence an unnecessary threat to green spaces and York's historic character and setting. York Civic Trust submitted an alternative vision, stating: "*York can blaze a trail in the UK for a new approach to growth, demonstrating that a great heritage can be the trigger for economic vitality, not a brake upon it. York's economic strength lies in its diversity: biosciences (research, agri-business and food technology), financial services, IT and the media, transport management and engineering, higher education and, crucially, cultural and heritage tourism*." This emphasis on the creation of jobs within a diverse economy is also raised by Holgate Ward Labour Party.

Economic Growth Forecast

Some respondents query the economic forecast upon which employment need and allocations are based, stating that it is based on restrained or flawed projections of growth, and commenting that it will not help achieve the Council's/LEP's own economic ambitions. (Northminster Limited/Avant Homes). However, the York North Yorkshire and East Riding LEP welcomes the City of York Economic Plan, which within its '8 Big Things' identifies The Local Plan, York Central and a shift

towards higher value jobs as priorities. This is consistent with the recently reviewed LEP Strategic Economic Plan and the need to lift wage and productivity levels in our area. These are also reflected within the consultation document.

Range and supply of sites

Amongst others, North and North Yorkshire Chamber/York Property Forum object to the planned range and supply of sites, calling it 'inadequate'. Further land should be identified to broaden the portfolio of sites and cater for a diverse range of business needs. On the basis of the sites identified there will be a risk that York would lose out on investment for potential occupiers. (William Birch and Sons/Oakgate Group and Caddick Group). Oakgate Group and Caddick Group consider that the approach promoted within the Preferred Sites consultation document is not in accordance with paragraph 160 of the National Planning Policy Framework (NPPF); reliance upon only York Central to deliver future office development would risk losing out on potential investment from those investors who are looking at space in the next five or ten years and those who are seeking a business park location but are deterred by congestion and quality of the environment at Monks Cross. While Make-it York support the planned provision for B1a space in York Central, there is concern that this is the only allocation for office use proposed against an identified 'severe shortage' of high quality Grade A office space. They further recommend the use of flexible use class allocations to mitigate the risk of undersupply.

Linkages between housing and economic growth

Several comments, including from Make-it York, note the need to ensure sufficient development land is available in accessible locations to encourage economic growth and broaden the supply of employment opportunities and jobs. "*The SHMA Addendum, the ELR and the consultation version of the Plan do not mention the impact of reducing the housing or employment targets on achieving the Council's economic ambitions, even though housing numbers supporting economic growth is a key element of Local Plan strategy*." (William Birch and Sons)

Employment Sectors

The need for York to develop more highly skilled and better paid jobs is a common thread, noting that while York has strong tourism and retail sector, it does not create high skilled, high paid jobs. *"We now need to ensure there is a clear connection between our future industrial base and the skills base in the City - the University of York has highlighted how its developments in the digital media and agro-tech and bio-tech industries could provide good economic growth opportunities. With the opportunities of HS2 and the transformation of the rail infrastructure, it is important that the rail industry can be sustained (notes need for Universities to develop engineering courses to ensure this). York needs to provide development opportunities for its current citizens, giving people the skills needed in the workforce in order to secure well paid jobs in the future. Note also the role of the Public Sector, Finance Sector and Industrial growth, and the need for the Plan to provide accommodation to fulfil their needs*" (Rachel Maskell MP). The knock on impact to out-commuting and traffic congestion is noted.

Gypsies, Travellers and Showpeople

A number of reps, including from York Green Party, Rachel Maskell MP and York Travellers Trust, raise concern that the Plan has been published without identifying sites for Gypsies, Travellers and Showpeople. York Travellers Trust offer specific policy rewording, requiring provision to be made through the largets new housing developments. They further suggest that the search for land for new sites should focus on options for smallersites than some which have been considered; successful sites are likely to be one of 2 types: public sites of 10-12 pitches; requiring a site of around 0.5-0.8ha; Private extended family sites with 4-5 pitches, requiring an area of at least 0.25 ha.

Propose changes to policy wording inclue:

- The need for policy guidance to guide decision making on applications that come forward for Travellers sites is advocated (The National Federation of Gypsy Liaison Groups.) Note that they express the wish to comment on any new assessment of need for travellers, particularly if recent change to definition results in reduction in assessed need;
- provision should be made to accommodate needs for open space/livestock management that the community may have.

Julian Sturdy MP supports the change in the Council's approach, resulting in the proposed de-allocation of sites for Gypsies and Travellers, further to revised national planning policy. A further comment states that travellers should not be allowed to take up residence on green belt that no-one else would be allowed to live on.

Transport

The Highways Agency comments across the Plan's area zones, as follows:

- Area 1 - Proposed housing numbers have been reduced in this consultation. Further work is still required on impact on A64/A1237 junction. New ST31 at Copmanthorpe proposes its main access from Tadcaster Road - its impact on the A64 junction with A1036 Tadcaster Road needs further investigation. Employment sites ST25 and ST21 have been removed - further work required to establish impact on A64/A19 Fulford Junction compared to previous Local Plan. Other sites deleted from Area 1 would have impacted on a number of junctions on A64;
- Area 2 - Plan indicates reduction of houses at ST15 - this needs considering with other potential developments in the city including University Expansion. New employment site ST27 indicates future development may provide opportunity for a further restricted/limited southern access to University from A64. Access agreed in principle for ST15, however, proviso is no through route into York. Do no support the enhanced road junction included within commentary relating to University Expansion site. Impact of both these sites on Grimston Bar junction must also be considered. St15 and ST27 we support need for detailed transport assessment and travel plan to predict impact on

surrounding highways network, including SRN. New site at Wheldrake (ST33) and employment allocations at Elvington Airfield, Wheldrake Industrial Estate and Elvington Industrial Estate - potential impact of these sites in combination with others in Area 2 on A64 junctions at Grimston Bar and Fulford Road needs to be evidenced;

- Area 3 - Housing and Employment sites in Dunnington have potential to impact in combination with other sites on A64 junction Grimston Bar;
- Area 4 - Several housing and employment sites off Hull Road including a new Employment site at land north of Grimston Bar (ST6) - likely impact on Grimston Bar needs mitigation. This applies to all sites along Hull Road. Land East of Metcalfe lane has been reduced in size - agree that this site requires detailed transport assessment work to understand traffic implications and impact on surrounding highway network including SRN. Several sites have been deleted to NE of York further work is required on impact of development at Hopgrove;
- Area 6 - Sites in Haxby, land West of Wigginton Road and Land North of Monks Cross will impact on Hopgrove junction. Important we understand impact of these allocations and identify appropriate mitigation;

East Riding of Yorkshire Council refer to the ERYC Infrastructure Delivery Plan (IDP), which highlights that joint working with Highways England (HE) and CYC is required to assess the impact of development the A64/A1079 Grimston Bar interchange and to establish any necessary mitigation measures. ERYC is committed to the continued ongoing joint working with CYC and HE.

In general, several comments question the approach of producing/consulting on a Plan in advance of detailed transport modelling. Amongst others, York and North Yorkshire Chamber/York Property Forum comment that the next stage of the Local Plan should contain explicit proposals to address the issue of integrated transport infrastructure. The City must be equipped to take advantage of HS2 and Northern Powerhouse Rail's connectivity across the north of England. It is also important to prioritise non-car based connections from the rail station to the wider City.

A number of Parish and Town Council's comment on the likely impact of further development on the local road network and/or parking:

- The increase in the number of car journeys arising from any development in the village taken together with the increase in the number of new houses proposed in the surrounding villages will undoubtedly cause an increase in traffic on the A1079, A166 and the number of cars passing through the village. Already major problems at the junction of the A1079 and Common Road. Any new development in the village will need to take the larger picture into account and will as a minimum require a new set of traffic lights at the junction of the A1079 and Common Road. (Dunnington Parish Council)
- Since the beginning of the Local Planning process, the level of congestion in and around the northern ring road has significantly increased with a knock-on effect to towns and villages such as Haxby and Wigginton. We now regularly experience traffic delays throughout the town due to traffic loads on the A1237 as users employ Mill Lane / The Village and York Road as a rat run to avoid the over-utilised ring road. Our local MP Julian Sturdy recently described the problems associated with the A1237 in Parliament as 'Simply put, the

congestion on York's outer ring road is acting as a noose on the city. It is choking growth and disincentivising inward investment.' Without significant improvements to the ring road any further development along the northern boundary of the city should cease. Haxby has a very real and current problem with parking , esp around the town centre / shopping area and any new development will make it worse. Conversion of the Haxby Hall site to public parking would provide much needed relief and bring benefit to local businesses.(Haxby Town Council)

- Nether and Upper Poppleton Parish Councils make the following comments in relation to development in the vicinity, including ST19/ST2/ST1 and H57 – Sustainable transport using the P+R scheme is unrealistic as it is time-limited and not routed through the village where services are located. Access and egress from ST1 onto Millfield Lane should be restricted by use of a rising bollard for buses and to reduce other vehicle traffic. The bollard currently at the end of Millfield Lane should be retained until the new road layout is established. Concern that impact of traffic on local rural roads and lanes should be minimised. Northfield Lane is a residential road, already impacted on by the large number of lorries accessing Northminster Park. Access and egress from the ST19 proposal onto A59 would only increase existing congested junction, particularly as this is an employment area. Claims of sustainable transport to the site are false – there are fewer people cycling to work in York than 20 years ago mainly due to dangerous conditions, increased traffic and an understanding of the effects of pollution on cyclists. Currently, there is no bus route accessible on this section of A59. A full analysis of traffic access and egress from site onto A59 is essential. The impact of more cars onto the busy Millfield Lane/A1237 junction needs full analysis.
- Skelton Parish Council objects to sites ST14 and ST9, in significant part due to the high risks of congestion on A1237, the damage to business caused by congested transport links and the improbability of effective road infrastructure being funded. They also draw attention to the impact of developments outside York's northern boundary, all served by A19 through Skelton.
- Strensall with Towthorpe Parish Council commen on the impact of development in Area 6 , stating that it will result in an increase in traffic using Moor Lane / Cross Moor Lane / Usher Lane / Haxby Moor Road to avoid using the A1237 – concern about use of Haxby Moor Road between Haxby and Strensall which includes a Grade II Listed bridge (Old Humpy) which is narrow and has a 7.5 tonne weight limit on it and the route past a school. The Parish Council has previously suggested that a rail halt could be provided between Strensall and Haxby on Towthorpe Road as a Park and Ride facility – in view of the planned increase in train services, this should be considered at an early stage.

A significant number of comments refer to the York outer ring road, and question its capacity to accommodate additional sites. The A1237 is a particular concern, given the proposed extent of development in the vicinity. Upgrading the existing road network would not be enough (Julian Sturdy MP/Skelton Village Action Group/Cllr Warters). A common response states: *"Traffic congestion and air pollution in York are already a problem, the northern by-pass needs upgrading to dual carriageway*

and any further major developments in that area will only add to the problems unless roads are upgraded before development work starts. Roads in and around York are in a poor state of repair and need major repairs and upgrades as proposed developments will bring about more traffic. Public transport also needs upgrading;, a central bus station or hub close to the railway station should be included within the Plan."

As part of its vision for York, and to address congestion and pollution, Holgate Ward Labour Party support a dedicated public transport "highway", ideally in the shape of a tramway operating between Poppleton and York station.

A number of additional comments:

- Why not make Grimston Bar a Public Transport Hub;
- Plan should make more of the City's rail connectivity (stations at Haxby/Strensall);
- Re York College – more car parking should be provided for college users, as residential streets are being used for overspill;

Infrastructure Delivery and Viability

Amongst others, Hambleton District Council, York and North Yorkshire Chamber of Commerce/York Property Forum and the Home Builders Federation comment on the need for the Plan to be clear about its infrastructure requirements: *"...This is crucial for demonstrating the Plan is sound. Ensuring that all the sites are deliverable is essential for neighbouring authorities which may be put under pressure where development does not come forward, especially where settlements have good accessibility to York." (Hambleton District Council).*

A significant number of responses voice concern over the potential impact of development proposed on the City's infrastructure, and the availability of funding to undertake necessary upgrades. Impacts on the road network (and specifically the outer ring road) are of significant concern. York Action Group Alliance asks that more emphasis is placed on a holistic and coherent strategy to provide the scale of the essential additional infrastructure and services required as a prerequisite to the creation of high quality sustainable communities.

Historic Environment

Given the importance of the Heritage Impact Appraisal as a tool to evaluating the degree to which the proposed allocations might impact upon SA Objective 14 (historic environment), it would seem essential to publish the latest iteration of that document alongside this current consultation (it is, after all, referred to within the footnote on page 12). Without it, it is impossible to ascertain how the Council has arrived at its assessment regarding the impact which the development of each site might have upon SA Objective 14 and, more importantly, whether or not that evaluation is likely to be correct. Moreover, without that document it is not possible to

identify what changes might be needed to each of the sites to ensure that they are developed in a manner consistent with the protection of the special character and setting of the historic City. Consequently, comments regarding the evaluation of the degree to which each of the Allocations is likely to be compliant with SA Objective 14 can only be of a general nature (Historic England).

Sustainable Construction

The small number of comments received support energy efficient new housing (including providing sound insulation), well served to reduce demand for car use and the potential for solar technology to be used on all new buildings.

Environmental Quality

Amongst others, Rachel Maskell MP comments that the Local Plan seriously lacks ambition for improving the environment and addressing pollution. The air quality in York is above acceptable levels and this impacts on peoples health and well being. Green space and tree planting are all important.

Haxby Town Council raise the following general issues: Concerned that additional traffic around Haxby as a result of the proposed developments would result in the annual mean Nitrogen Dioxide objective being exceeded and request that developers undertakes assessments and monitoring of the situation. Foss IDB has objected to even small scale development in Haxby due to Westfield Beck being at capacity and with a history of flooding due to this limitation. Request that further clarification is sought on how the proposed large retention ponds to handle surface water would be maintained and who would bear the cost. The proposals only deal with new homes while failing to address the current drainage issues in Haxby. Sewer provision is already inadequate due to previous over development - this will only be made worse with more housing.

Flooding and Drainage

A number of comments refer to recent flooding events in the City, and question whether sufficient emphasis is being placed on flood mitigation in relation to new development (York and North Yorkshire Chamber/York Property Forum). There is support for the suitability assessment and sequential approach to site selection (ie prioritising sites of low flood risk). One comment asks that a summary of proposed additional flood defences is included for each site.

Amongst others, York Green Party further advise that surface water flooding is acknowledged as a issue; it must also be considered as part of sequential flood risk, noting the impact of runoff into drains and watercourses and allowing for the increased frequency of short and more prolonged periods of intense rainfall as a

result of climate change. The Internal Drainage Board advises that the risk of flooding should be reduced as far as practicable. Surface water should be managed sustainably. In areas where drainage problems could exist, development should not be allowed until CYC is satisfied surface water drainage has been satisfactorily provided for.

Joseph Rowntree Housing Trust make the following comment: *"...as a result of development proposals in the emerging Local Plan, all of the waste water treatment works serving York will experience capacity problems at some stage but until the development allocations and the timing of development are finalised, Yorkshire Water will not be able to indicate what improvement of extension works are necessary, or where, or when. It seems to us, however, that since there is a prospect of significant development at Haxby and north of Clifton Moor, together with other developments proposed by the Trust to the north of New Earwick, the Council could usefully engage with Yorkshire Water to consider the cumulative impact of these developments on the operation of the Rawcliffe Wastewater Treatment Works with a view to apportioning the cost of any improvements that might be necessary and when these might need to come on stream."*

Healthcare

Yorkshire Ambulance Service (YAS) has, for the way in which it locates its vehicles, developed a more time and cost efficient service that is response-led, based upon a 'Hub and Spoke' system. The Council has created new setllements in the form of villages that sit outside the main urban area. These new settlements are not currently catered for in the ambulance current response locations. These new settlements therefore generate a challenge for the ambulance service in responding to the Government target response times (targets included in representation), which cannot be met from the existing Hub and Spoke strategy that operates in the City of York. (Yorkshire Ambulance Service)

York Hospitals NHS Foundation propose a new build development for 60 inpatient mental health beds in York. Locations under consideration are: Bootham Park Hospital, Clifton Site. The Retreat, Brook Nook, Millfield Lane (Poppleton), Lowfileds (Acomb), Moorside (Monk Cross), Former Bio-Rad, Fulford and Naburn, Earswick, Huntington, Boroughbridge Road.

Note general concern that an increase in population may further increase GP waiting times.

Minerals and Waste incl Fracking

The Coal Authority advises that the issue of unstable land due to coal mining activity should be fully considered prior to final site selection being undertaken.

Amongst others, Cllr Waller raises significant concerns relating to the development,

operation and long term legacy of Fracking for which the public would like to see the same opportunities to challenge planning applications as happens to other energy sources (eg windfarms). The impacts of such schemes must be addressed in the local plan.

Natural Environment

General support for the protection afforded to nature reserves, parks and open green spaces, and concerns that development may impact upon these sites, especially Askham Bog Nature Reserve.

The YOC is encouraged by the statement in the Sustainability Appraisal that it will be a priority to: Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs. Protect and enhance locally important nature conservation sites SINCs. Birds are highly mobile and may travel significant distances to find areas for feeding, resting, roosting and breeding. Where birds are concerned landscapes are continuous; the proposals within the draft Local Plan are very likely to impact on areas outside the City of York boundary and vice versa. The new Local Plan has the opportunity to enhance the protection and management of environmentally important sites, and the potential to cause significant irreversible damage to existing sites. The life of the Local Plan is 15 years but damaging impacts on the environment are likely to be permanent because many habitats can not be recreated and their original species will have been lost. Even if future restoration projects were undertaken it could take centuries to recover what has been lost in years. The YOC applauds the Sustainability Appraisal statement (see 5134/SA/Theme/18/supp) but does not believe the draft Local Plan fully and comprehensively supports the aspirations in the statement. (York Ornithological Club).

Cllr Warters supports the A166 green corridor improvements and would welcome the same on the A1079, as well as maintenance of existing green routes into the city.

SBO Lands Ltd request the removal of Wheatlands Woodland as a designated Site of Local Interest for Nature Conservation. Submitted with ecology evidence. Consider that the site does not perform functions of an SLI as outlined in CYC Biodiversity Action Plan as woodland is of limited nature conservation value and there is no evidence of protected or notable species.

One comments suggests the Plan include a tree planting strategy.

Open Space

Sport England's consultation response restates NPPF guidance on the need for Local Plans to set strategic policies on open space, sports and recreation to support healthy communities, the need for up-to-date evidence to justify proposals in the plan and, where relevant, the requirement for LPAs to make planned replacements for

any sport facilities that will be lost or redeveloped through development. Note that their further objections submitted in response to the consultation document relate to the Plan not yet providing clear evidence that the sport facilities are surplus - simply inserting text to the effect that, unless it can be evidenced that sport facility is surplus then it should be replaced, could lead to an allocation being found undeliverable if such an appropriate replacement facility could not be found.

Several respondents note the importance of strategic green space and support both its protection and the creation of further areas. A number of comments (including from Cllr Waller) raise deficiencies in Westfield/West of York area, stating that peripheral green space between the urban edge and ring road functions as such within the area.

Haxby Town Council requests that additional land should be set aside for an extension to the cemetery (earmarking the field to the north and east of the existing cemetery.

Strensall Tigers Football Club notes the underprovision of sports pitches (football/cricket) in Strensall and calls for the Local Plan to provide for additional space to accommodate multiple pitches on a single site.

Other general comments

General support/objection

Several respondents voice general support for the Preferred Sites document, including York Civic Trust, Rufforth and Knapton Neighbourhood Planning Group, York Action Group Alliance; several others that the proposed approach is unsustainable and unsuitable.

Historic England generally welcomes the changes made to sites since previous drafts of the plan to reduce harm to the historic character and setting of York

York and North Yorkshire Chamber/York Property Forum are increasingly concerned that the absence of a local plan is inhibiting the provision of housing and employment floorspace required to maintain continued economic growth and the success of the City. Now more than ever a political consensus is needed to secure a Local Plan for the City.

Linden Homes, Taylor Wimpey and Persimmon Homes comment that the Preferred Sites document fails to meet the 4 tests of soundness for a plan and is not in line with NPPF. Plan does not set out the spatial strategy; the OAHN does not meet national policy and the Council has not provided a SHLAA; there is therefore no evidence that allocations are deliverable or developable. Does not show or reflect presumption in favour of sustainable development. The Plan as drafted is neither justified, sound nor effective, and has not been positively prepared. Sites have not been subject to a full SA.

Cllr Warters objects to the plan in principle stating that it was drawn up as a result of

the latest political make up, with sites removed for political expediency and others now supported by Officers that were once considered unsuitable. *"I have no faith in this process and will make these points clearly in the public enquiry".*

General approach to growth/spatial strategy

A number of comments note the consultation Plan's lack of an overarching vision, or any statement to indicate that the sites included within the document rest on an emerging Core Strategy or vision of any early version of either a draft plan or DPD; this is therefore an inappropriate form of consultation inviting comment without context. (Avant Homes, Linden Homes, Taylor Wimpey and Persimmon Homes)

York Green Party makes a number of general comments, including: concern about impact of sites on local infrastructure and sustainable transport options; concern about impact of scale of development on public open space; new infrastructure provision should be phased to meet the needs of new residents as early as possible; we should aim for mixed-use development on all but the smallest sites, rather than purely housing or employment sites; concern over recent trend to convert employment sites in the city to residential; concern that the significant part of the Plan's housing allocation is located on the outskirts of the city.

Huntington and New Earswick Liberal Democrat Cllrs do not believe that the parameters that are required by the Local Plan to meet legislation are appropriate for York and will lead to unsustainable pressures on the city.

Several comments query the planned provision for the resources (schools, doctors, dentists, open space etc) needed to support the additional population evidenced by additional housing; and further, that the plan should create successful neighbourhoods rather than just houses.

Duty to co-operate/cross-boundary issues

North Yorkshire County Council notes that none of the preferred sites proposed within the document appear to present significant cross-boundary issues at this time. NYCC agrees with the importance of both upgrading the A1237 through dualling and appropriate junction improvements; and maximising the significant opportunities presented by the redevelopment of the York Central site

East Riding of Yorkshire Council - The East Riding Local Plan considers the close functional relationship the East Riding of Yorkshire, in particular the Vale of York sub area, has to the City of York. The history of cooperation between ERYC and City of York Council (CYC) in the preparation of their respective plans is also noted.

York, North Yorkshire and East Riding LEP - The City of York plays a key role as the only city within the York, North Yorkshire and East Riding functional economic geography. Therefore, the success of York directly impacts on its neighbours and proximity to the City is a key driver for its rural hinterland. For York to deliver on its potential and to maximise its role as a driver in the wider rural economy, it is essential that it delivers a local plan, which supports and enables high value private sector growth. It is imperative that the assumptions within the plan and the

contingencies to accommodate different growth outcomes, either due to sites proving unviable, or York exceeding its growth forecasts, are clear and robust and that the impact on neighbours is clearly understood. The delivery of critical infrastructure and key employment sites, underpinned by an ambitious Local Plan and strong partnership with both LEPs and Central Government is vital. For York, the A1237 Outer Ring Road and York Central are critical. An ambitious plan, which can deliver this strategic infrastructure, would provide the confidence to investors that York can deliver on its potential. We remain committed to supporting delivery of these strategic priorities for York and will fully support a Local Plan which provides for these ambitions.

North Yorkshire Police along with the OPCC for North Yorkshire need to assess how new development within the Policing area will impact on the service provided, taking into account relevant strategies that both the Police and the OPCC have in place. The growth in web and mobile phone technology and the increase in 24/7 automated facilities have revolutionised the publics perception of the police force. Demand for the 101 service far exceeds the number of visits to police stations. North Yorkshire Police is investing significantly in information and communications technology. For example, the introduction of digital services to allow front line officers to operate entirely from the beat rather than returning to the office to use computers. New forms of agile working will give more flexibility and impact on how accommodation is provided. The force has been reviewing its estate strategy, based on 3 strands (Strand 1 -Core operation hubs; Strand 2 - Partnership locations; Strand 3 - Local Community 'touchpoints'). This will be further analysed in the future response to the Publication Draft Local Plan Consultation next year.

Yorkshire Ambulance Service (YAS) has, for the way in which it locates its vehicles, developed a more time and cost efficient service that is response-led, based upon a 'Hub and Spoke' system. The Council has created new settlements in the form of villages that sit outside the main urban area. These new settlements are not currently catered for in the ambulance current response locations. These new settlements therefore generate a challenge for the ambulance service in responding to the Government target response times (targets included in representation), which cannot be met from the existing Hub and Spoke strategy that operates in the City of York. (Yorkshire Ambulance Service)

[redacted] - the representor postulates whether a more sub-regional and strategic approach to housing delivery in York needs to be considered. A potential opportunity for a new settlement could be located just to the north of York at New Parks, which is in Hambleton District. The New Park's settlement has the potential to deliver at least 5,000 to 6,000 new homes in its initial generation as well as the necessary services and facilities to create a sustainable location for new homes

Avant Homes/Owners of Land West of Monks Cross North note that York has strong cross-boundary housing market and concerned that SHMA considers market self-contained in York. Council should identify actions for dealing with cross-boundary issues. It is unclear how Preferred Sites consultation reflects the housing ambitions of York, North Yorkshire and East Riding Local Enterprise Partnership; this should be included in the evidence.

SA comments

Natural England welcomes the plan's updated site appraisals and para. 1.9 which states that the next iteration of SA will include full appraisals of strategic sites and alternatives against the SA Framework.

Pilcher Homes and Barwood Strategic Land II LLP object to the Council's approach, which has not used the SA to consider reasonable alternatives, instead limiting it to appraising site allocations to be included within the abortive LP Publication Draft (October 2014). There is no opportunity to demonstrate that the Plan has been fully justified and the most appropriate strategy, or that sites identified have been considered against other reasonable alternatives. PPG paragraph 017 advises that plan makers should assess policies in a draft local plan to identify the significant effects of the available options. Reasonable alternatives should be identified and considered at an early stage. With regards to plan making the NPPF confirms at paragraph 152 that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. As set out in our QC Advice the LPPS is accompanied by an Interim SA Report - this is stated to supersede those previously considered in the Sustainability Appraisals (SA). It is the intention of CYC to then move forward to prepare a full SA to test sites and alternatives. This approach is deeply flawed and 'it has a poor relationship to legal requirements and will tend to appear as an exercise in retrofitting evidence to a pre-determined outcome'. There is no available evidence to demonstrate that a reasonable range of alternative approaches have been evaluated in an SEA context prior to choices being made; rather a preferred approach has been identified prior to any proper SEA exercise and in the absence of the completion of a comprehensive Green Belt Assessment. CYCs approach is clearly unsound and has been carried out without essential requirement of supportive evidence to inform the choices being pursued.

Linden Homes, Taylor Wimpey and Persimmon Homes note that the absence of comparison of reasonable alternatives in the Sustainability Appraisal does not make it possible to consider the suitability of the revised portfolio of sites. SA should test all reasonable alternatives and set out a justification for spatial distribution. Without spatial strategy and evidence, it is not possible for SA to explore options and policies. Absence of comparison of reasonable alternatives in SA does not make it possible to consider the suitability of the revised portfolio of sites. Concerns that not all reasonable alternatives considered.

Consultation process

A number of respondents feel that the consultation process has been poorly timed to coincide with summer holidays. And that it does not appear to be a clear and transparent, fully informed consultation process. Comments note that the consultation process is overly complex, and may put people off responding. Having to complete a separate online form for each site is confusing and inefficient for most people.

There is concern that an assumption has been made that the Plan is acceptable

before being approved, and that planning applications may be made on land before the local plan is approved.

There is concern about the how the Copmanthorpe Neighbourhood plan was produced and influenced as well as how it is used.

No comments

A number of respondents make no comment on the preferred site's consultation document.

7.0 Conclusion and next steps

6.1 The Local Plan will be the development plan for York over the 15 years, from 2018 – 2033. It will include a vision for the future development of the city and a spatial strategy and will cover both strategic policies and allocations, alongside detailed development management policies. The preparation of the Local Plan follows on from the previous Local Development Framework process, Local Plan Preferred Options consultation in 2013 and Further Sites consultation in 2014.

6.2 Consultation comments received as part of previous consultation stages, alongside further technical work, will be used to help develop the publication local plan. The publication local plan will be subject to another round of consultation. This will give everyone another chance to object, support or comment on the sites and policies. After which, a final plan will be submitted to the Secretary of State for examination.

Annex A

Copy of Comments Form

City of York Local Plan

Local Plan Preferred Sites Consultation Comments Form

Responses on this form should only relate to the sites and / or information set out in the Preferred Sites Consultation documents. We will seek your views on the Publication Local Plan early in 2017. Comments made on previous stages on the Plan will be taken into account.

We will use the information you provide us to inform the next stage of the Local Plan and a summary of your comments will be published. A full copy of your comments (excluding personal information) will also be placed on the Council's website. Any personal information provided will be kept in accordance with the Data Protection Act 1998. If the Council is asked an enquiry under the Freedom of Information Act or the Environmental Information Regulations then we will only disclose information we have been provided with in accordance with the relevant legislation.

- **All responses should be returned by 5pm on Monday 12th September 2016 so that we can take your views into account**.
- **Please complete a separate form for each issue and/or site/s you are commenting upon**.

Please *complete all sections* of the form in BLOCK CAPITALS.

Are you commenting on:
Housing Growth ☐ Employment Growth ☐ Specific Sites ☐

SECTION 1: YOUR SITE COMMENTS	
Site Name	
Site Reference	
Page number (please specify which document e.g. main document or which supporting document when stating page number)	

Please continue on a separate sheet if necessary, noting the document/page/site reference to which you are responding.

Your Comments

SECTION 2: YOUR PERSONAL and CONTACT DETAILS			
Name			
Organisation *(if relevant)*			
Representing *(if relevant)*			
Address			
	Postcode		
Telephone			
Email			
Signature		Date	

SECTION 3: CONSENT	
I give permission for the City of York Council to contact me with information on the further stages of the Local Plan production and other planning policy documents for York (Please tick)	
I give permission for the City of York Council to use the information I have provided, for the stated purposes of this consultation. (Please tick).	

To find out more about what the Council does with your personal information, www.york.gov.uk/privacy

If you have any queries, please contact us:
Tel: (01904) 552255
E-mail: localplan@york.gov.uk

Please return completed forms
(no stamp required) to:
FREEPOST RTEG-TYYU-KLTZ
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

Deadline 5pm 12th September 2016

How did you hear about this consultation?

Do you have any general comments on this consultation process?

Annex B

Copy of Consultation letter/Email

City & Environmental Services

Planning and Environmental Management
West Offices
Station Rise
York
YO1 6GA

01904 552255

14th July 2016

Dear Sir/Madam

City of York Local Plan Preferred Sites 2016 Consultation

I am writing to inform you about the opportunity to comment on the 'Local Plan – Preferred Sites (2016)' document.

The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years (2012 – 2032) and beyond by balancing the need for housing and employment growth with protecting York's unique natural and built environment . You may be aware that the Local Plan has been prepared over a number of stages. Previous consultation has taken place on Preferred Options and a Further Sites Consultation which you may have been involved with in summer 2013 and summer 2014 respectively.

This Preferred Sites (2016) document presents updated evidence in relation to both housing and employment growth and also presents a revised portfolio of sites to meet that growth based on further technical assessment. It draws on the previous stages of consultation and technical work undertaken to support the Local Plan. The Preferred Sites (2016) document is supported by a number of technical documents which include a Strategic Housing Market Assessment (SHMA), Employment Land Review (ELR), Sustainability Appraisal (SA), Windfalls technical paper and a Local Development Scheme (LDS). All these documents are available to view online (www.york.gov.uk/localplan) or are available to view in the Council reception at West Offices or in all York libraries.

Your views on the Preferred Sites (2016) document are sought. The purpose of the consultation is to enable the public and other interested parties to comment on additional work undertaken relating to housing and employment land need and supply and the identified preferred sites. Any representations made will then be taken into consideration in drafting the next stage of the plan, the Publication Draft. The Publication draft will contain site allocations as well as policies.

The consultation period for the Local Plan Preferred Sites (2016) document starts on **Monday 18th July 2016.** All consultation material will be live on the Council's website (www.york.gov.uk/localplan) and available in libraries from this date.

Responses must be received by **5pm** on **12 September 2016** and should be made on a representation form. Response forms are available on the Council's website (www.york.gov.uk/localplan) or are available from the Council's West Offices reception or from your local library. Alternatively look out for a special edition of the council's newsletter Our City, which provides lots of ways you can feedback during the consultation, including a freepost address.

In addition drop-in sessions (3pm-7.30pm) will be held across the city. At these sessions you will be able to view the documents, speak to officers and pick up a response form.

- 3rd August at West Offices, York City Centre
- 9th August at Osbaldwick Sports Centre, Osbaldwick
- 11th August at Dunnington Reading Rooms, Dunnington
- 16th August at York Sport, Heslington
- 18th August at Acomb Explore Library, Acomb
- 24th August at Tesco (Tadcaster Road), Dringhouses
- 24th August at Oaken Grove Community Centre, Haxby

Responses to this consultation should only relate to the sites and / or information set out in the Preferred Sites (2016) Consultation document or associated technical documents. We will seek your views on the Publication Local Plan early in 2017.

We will use the information you provide us to inform the next stage of the Local Plan and a summary of your comments will be published. A full copy of your comments (excluding personal information) will also be placed on the Council's website. Any personal information provided will be kept in accordance with the Data Protection Act 1998. If the Council is asked an enquiry under the Freedom of Information Act or the Environmental Information Regulations then we will only disclose information we have been provided with in accordance with the relevant legislation.

Please find enclosed a copy of the Preferred Sites (2016) Consultation document and city wide map, on which we are seeking your views and a representation form on which to submit your comments. All the supporting documents can be viewed at the reception at the Council's West Offices and in all of City of York Council libraries and online at www.york.gov.uk/localplan .

In addition, all the consultation documents and further evidence base documents published at previous rounds of consultation will also be available on the Council's website at www.york.gov.uk/localplan from 18th July 2016.

If you require any further information on the consultation please contact the Planning and Environmental Management Department at localplan@york.gov.uk or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully

Martin Grainger
Head of Planning and Environmental Management

Enc:

- Preferred Sites (2016) Consultation Document
- Preferred Sites (2106) Consultation – City wide map
- Representation Form

CITY OF YORK COUNCIL

City & Environmental Services

Planning and Environmental Management
West Offices
Station Rise
York
YO1 6GA

01904 552255

13th July 2016

Dear Sir/Madam

City of York Local Plan Preferred Sites Consultation

I am writing to inform you about the opportunity to comment on the 'Local Plan – Preferred Sites (2016)' document.

The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years (2012 – 2032) and beyond by balancing the need for housing and employment growth with protecting York's unique natural and built environment . You may be aware that the Local Plan has been prepared over a number of stages. Previous consultation has taken place on Preferred Options and a Further Sites Consultation which you may have been involved with in summer 2013 and summer 2014 respectively.

This Preferred Sites (2016) document presents updated evidence in relation to both housing and employment growth and also presents a revised portfolio of sites to meet that growth based on further technical assessment. It draws on the previous stages of consultation and technical work undertaken to support the Local Plan. The Preferred Sites (2016) document is supported by a number of technical documents which include a Strategic Housing Market Assessment (SHMA), Employment Land Review (ELR), Sustainability Appraisal (SA), Windfalls technical paper and a Local Development Scheme (LDS). All these documents are available to view online (www.york.gov.uk/localplan) or are available to view in the Council reception at West Offices or in all York libraries.

Your views on the Preferred Sites (2016) document are sought. The purpose of the consultation is to enable the public and other interested parties to comment on additional work undertaken relating to housing and employment land need and supply and the identified preferred sites. Any representations made will then be taken into consideration in drafting the next stage of the plan, the Publication Draft. The Publication draft will contain site allocations as well as policies.

The consultation period for the Local Plan Preferred Sites document starts on **Monday 18th July 2016.** All consultation material will be live on the Council's website (www.york.gov.uk/localplan) and available in libraries from this date.

Responses must be received by **5pm** on **12 September 2016** and should be made on a representation form. Response forms are available on the Council's website (www.york.gov.uk/localplan) or are available from the Council's West Offices reception or from your local library. Alternatively look out for a special edition of the council's newsletter Our City, which provides lots of ways you can feedback during the consultation, including a freepost address.

In addition drop-in sessions (3pm-7.30pm) will be held across the city. At these sessions you will be able to view the documents, speak to officers and pick up a response form.

- 3rd August at West Offices, York City Centre
- 9th August at Osbaldwick Sports Centre, Osbaldwick
- 11th August at Dunnington Reading Rooms, Dunnington
- 16th August at York Sport, Heslington
- 18th August at Acomb Explore Library, Acomb
- 24th August at Tesco (Tadcaster Road), Dringhouses
- 24th August at Oaken Grove Community Centre, Haxby

Responses to this consultation should only relate to the sites and / or information set out in the Preferred Sites (2016) Consultation document or associated technical documents. We will seek your views on the Publication Local Plan early in 2017.

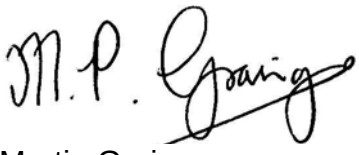
We will use the information you provide us to inform the next stage of the Local Plan and a summary of your comments will be published. A full copy of your comments (excluding personal information) will also be placed on the Council's website. Any personal information provided will be kept in accordance with the Data Protection Act 1998. If the Council is asked an enquiry under the Freedom of Information Act or the Environmental Information Regulations then we will only disclose information we have been provided with in accordance with the relevant legislation.

All the consultation documents and further evidence base documents published at previous rounds of consultation will also be available on the Council's website at www.york.gov.uk/localplan from 18th July 2016.

If you require any further information on the consultation please contact the Planning and Environmental Management Department at localplan@york.gov.uk or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully



Martin Grainger
Head of Planning and Environmental Management

Cover email text

PLEASE SEND FROM LOCAL PLAN INBOX

Subject box: City of York Local Plan Preferred Sites Consultation

Main text:

Dear Sir/Madam,

I am writing to inform you about the opportunity to comment on the 'Local Plan – Preferred Sites (2016)' document.

The consultation period runs from Monday 18th July until 5pm on Monday 12th September 2016.

Please see attached letter for more details.

Regards,

Martin Grainger
Head of Planning and Environmental Management

Annex C

List of Consultees

Preferred Sites Consultation (July to September 2016)

The following organisations were consulted:

38 Degrees, Yorkshire Wildlife Trust
3Ps People Promoting Participation
5 LLP
AAH Planning
Abode Group
Acaster Malbis Parish Council
Acaster Selby & Appleton Roebuck Parish Council
Accent Group
Acomb Green Residents Association
Acomb Planning Panel
Action Access A1079
Active York
AECOM
Age UK
Ainscough Strategic Land
AKA Planning
All Saints RC School
Alliance Planning
AMEC E & I UK Ltd
Ancient Monuments Society
Andrew Martin Associates
Appleton Roebuck Parish Council
Architectural & Creative Design Ltd
Arclight
Arcus Consultancy Services Ltd
Arriva Yorkshire
ASDA Stores Ltd
Ashfield Holiday Cottages & Touring Caravan Park
Ashtenne Industrial Fund LLP
Askham Bryan College
Askham Bryan Parish Council
Askham Grange
Askham Richard Parish Council
Associated British Foods plc
Atisreal UK
Autohorn Ltd
Aviva
Aviva Life
Badger Hill Residents Community Group
BAGNARA
Banks Development Ltd
Banks Group
Barratt & David Wilson Homes
Barratt Developments PLC
Barratt Homes & David Wilson Homes Yorkshire East & West Divisions
Barratt Homes (York) Ltd
Barratt Homes Yorkshire East & David Wilson Homes Yorkshire East
Barratt Homes Yorkshire East & David Wilson Homes Yorkshire East
Barratt Homes, Persimmon Homes, Miller Homes, Shepherd Homes, Taylor Wimpey & Helmsley Group
Barratt/David Wilson Homes & Linden Homes
Barrs & Co Chartered Surveyors
Barry Crux and Company
Barton Willmore
Barton Wilmore
Barwood
Barwood Strategic Land II LLP
BBC Radio York
Beck Developments
Bell Farm Residents Association
Bellway Homes Ltd
Bellway Homes Yorkshire Ltd
Belvoir Farm Partners
Bettys Café Tea Rooms
Bilfinger GVA
Bio-Rad Laboratories Limited
Biovale Steering Group
Bishop of Selby (Diocese of York)
Bishophill Action Group
Bishopthorpe Parish Council
Blacker Brothers
Blackett, Hart & Pratt LLP
Blacklion Ltd
Boots plc
Bovis Homes Ltd
Bramhall Blenkharn
BRE
Brian Bell Carpets Ltd
Brimble, Lea and Partners
British Geological Survey
Broadacres Housing Association
Browns of York
BTCV (York)
Buckley Burnett Limited
Buglife
Bull Balks Frontage Holders
C B Richard Ellis Ltd
C P R E York & Selby Branch
Camerons Megastores
Campaign for Real Ale

Campaign For Real Democracy
Canal & River Trust
Carecent
Carers Together
Carr Junior Council
Carr Junior School Safe Skate Committee
Carstairs Countryside Trust
Carter Jonas LLP
Carter Towler
Cass Associates LLP
Catton Parish Council
CE Electric UK
CEMEX
Centros
Chapelfields Residents Association
Chevin Housing Association
Childcare Sufficiency Group
Chris Thomas Ltd Outdoor Advertising Consultants
Christmas Angels
Church Commissioners for England
Church Of England Parish Of Huntington, Earswick & New Earswick
Church of the Holy Redeemer Parochial Church Council
Churches Together in York
City Of York Hockey Club
City of York Labour Party
Civil Aviation Authority
CLA North
Claxton & Sandhutton Parish Council
Clementhorpe Community Association
Clifton Medical Practice (Dr Calder & Partners)
Clifton Moor Business Association
Clifton Moor Consortium (T W Fields, Barratt Homes, Hallam Land Mgt Ltd & Commercial Estates Group)
Clifton Planning Panel
Clifton Residents Association
Clifton Without Parish Council
Cobalt Builders Ltd
Colliers CRE
Colliers International
Colton Parish Council
Commercial Development Projects Limited
Commercial Estates Group
Community Rangers
Compass
Conservation Area Advisory Panel
Consortium of Landowners of Land at Moor Lane
Constructive Individuals
Copmanthorpe Parish Council
Copmanthorpe Residents Association
Copmanthorpe Wind Farm Action Group
Cornlands Residents Association
Council for British Archaeology
Country Land & Business Association
Countryside Properties (Northern) Ltd
Cowling, Swift and Kitchin
CPP Group Plc
CPRE (York and Selby Branch)
Crease Strickland Parkins
CRED Ltd (Carbon Reduction)
Crockey Hill Properties Limited
Crosby Homes
CSSC Properties Ltd
CTC North Yorkshire
Cundalls
CYC Mansion House
Cyclists Touring Club (North Yorkshire)
Cyclists Touring Club (York Section)
Dacre Son & Hartley
Dacres Commercial
Daniel Gath Homes
Dart Energy (Europe) Ltd
David Chapman Associates
David Wilson Homes & Linden Homes
DE Operations North (Catterick Office)
DEFRA
Deighton Parish Council
Dev Plan (Stewart Ross Associates)
Development Planning Partnership (DPP)
Diocese of Middlesbrough
Diocese of Ripon and Leeds
Directions Planning Consultancy Ltd
DLP (Planning) Limited
DLP Planning Ltd
Dobbies Garden Centres PLC
Dodsworth Area Residents Association
Dower Chase/Dower Park Residents Group
DPDS Consulting Group
DPP One Ltd
Dringhouses and Woodthorpe Planning Panel
Dringhouses Local History Group
Dringhouses Local History Group
Dringhouses West Community Association
Drivers Jonas Deloitte
DTZ
Dunnington & Grimston Playing Fields Association

Dunnington & Grimston Playing Fields Association
Dunnington Motor Care
Dunnington Parish Council
Dunnington Residents Association
DWA Architects
Earswick Action Group
Earswick Parish Council
Earswick Village Housing Trust
East Cottigwith Parish Council
East Riding of Yorkshire Council
Economic Development Board
EE
Elvington Action Group
Elvington Action Group
Elvington Action Group
Elvington Action Group
Elvington Church of England Primary School
Elvington Church of England Primary School
Elvington Parish Council
Elvington Parish Council
Elvington Park Ltd
England & Lyle
England and Lyle Ltd
English Heritage Yorkshire and the Humber Region
Environment
Environment Agency
Equality and Human Rights Commission
Escrick Church of England Primary School
Escrick Parish Council
Escrick Park Estate
Escrick Village Support Group
Evans of Leeds Ltd
EWS
F & B Simpson, Mrs Kay and J Exton
Fairhurst
Fairness & Equality Board
Family Housing Association
Family Mediation
Farming & Wildlife Advisory Group
Federation of Residents and Community Associations
Fenwick Ltd
First York
First/Keolis Transpennine Ltd
Firstplan
Fitzpatrick Commercial
Flanagan James Limited
Flatford Ltd
FLP
Forestry Commission
Foss Bank Kennels & Cattery
Foxwood Residents Association
FRD Ltd
Friends Families & Travellers
Friends Of Rawcliffe Meadows
Friends of St Nicholas Fields
Friends of the Earth (York and Ryedale)
Fulford Battlefield Society
Fulford Battlefield Society
Fulford Community Orchard
Fulford Friends
Fulford Parish Council
Fusion Online
Gallagher Estates
Garden History Society
GARLAND (The Garden and Landscape Heritage Trust)
Gate Helmsley & Upper Helmsley Parish Council
Gem Holdings (York) Ltd
George F White
George Wimpey North Yorkshire Ltd
Georgina Grace Trust
Gerald Eve
GHT Developments Ltd
Gillygate Surgery
Gladedale Estates Ltd
Gladman Developments
GMI Estates Ltd
Gordons LLP
Greenwood Residents Association
Gregory Gray Associates
Gregory Property Developments (Haxby) Ltd & Biorad
Groves Residents Association
Guildhall Planning Panel
GVA Grimley Limited
GVA Grimley Limited
Halcrow Group Ltd
Halifax Estates
Hallam Land Management Ltd
Hambleton District Council
Harris Lamb Ltd
Harrogate Architectural
Harrogate Borough Council
Harron Homes
Hartley Planning Consultants
Harton Parish Council

Haxby & Wigginton Ward Liberal Democrat Councillors and Haxby & Wigginton Liberal Democrats
Haxby & Wigginton Youth & Community Association
Haxby Town Council
Health and Wellbeing Board
Hempland Primary School
Henry Boot Development Ltd
Heslington East Community Forum
Heslington Parish Council
Heslington Sports Field Management Committee
Heslington Sports Field Management Committee
Heslington Village Trust
Hessay Parish Council
Heworth Planning Panel
Heworth Without Parish Council
Hickling Gray Associates
High Horcom Farming Partnership
Higher York
Higher York Joint Student Union
Highways Agency
Historic England
Hogg Builders (York) Ltd
Holtby Parish Council
Home Builders Federation
Home Housing Association
Homes & Communities Agency
Hotel Solutions
Hourigan Connelly
Housing Corporation
How Planning LLP
Howarth Timber Group
Huby Parish Council
Hull Road Planning Panel
Hungate (York) Regeneration Ltd
Huntington & New Earswick Lib Dem Councillors
Huntington Burial Authority
Huntington Parish Council
Huntington Rovers Football Club
Husband and Brown Ltd
I Can Play Tennis Ltd
Iain Bath Planning
Ian Baseley Associates
Iceni Projects Limited
ID Planning
IDAS
Indigo Planning
Indigo Planning Ltd
J Liversidge & Sons
Jacks Coffee Shop
James Downes Chartered Architect
Jan Molyneux Planning
Jennifer Hubbard Planning Consultant
Job Centre Plus
John Howlett Planning
Johnson Brook
Jones Lang LaSalle (LaSalle UK Ventures Property)
Jones Lang LaSalle (LaSalle UK Ventures Property)
Joseph Rowntree Foundation
JWPC Limited
JWPC Ltd
KCS Development Ltd
Kember Loudon Williams Ltd
Kentmere House Gallery
Keogh Planning
Kexby Parish Council
Kexby Parish Council
KeyLand Developments Ltd
King Sturge
Kirkwells
Knapton Lane Residents Association
Knight Frank
Kyle & Upper Ouse Internal Drainage Board
Kyng Properties Ltd
La Salle UK Ventures
Lambert Smith Hampton
Land Securities Plc
Land Securities Properties Ltd
Landmark Developments
Landmatch Ltd
Lands Improvement
Langleys
Laverack Associates Architects
LDP Planning
LEAF
Leeds City Council
Leeman Road Community Association
Leeman Road Millennium Green Trust
Leeman Stores
Lidgett Grove Scout Group
Lifeline
Lifelong Learning Partnership
Lillings Ambo Parish Council
Linden Homes
Linden Homes & Escrick Park Estate
Linden Homes North & Miller Homes

Linden Homes Strategic Land
Lindsey Residents Association
Lindum York
Linton On Ouse & Shipton By Beningbrough Parish Councils
Lions Club
Lister Haigh Ltd
Little Acorns, New Earswick
Lives Unlimited
Local Government Yorkshire and Humber
Long Marston Parish Council
Longhurst and Havelok Homes
Loxley Homes
LXB Properties Ltd
Marks & Spencer plc
Marsden Homes Ltd
Matbo Limited
McArthur Glen Designer Outlet
McCarthy & Stone Retirement Lifestyles Ltd
McKechnie Plastic Components
Meadlands Area Residents Association
Melrose PLC
Mental Health Forum
Metro
Micklegate Planning Panel
Miller Homes
MIND
Mineral Products Association
Minsters Rail Campaign
Minsters Rail Campaign
Mitchells & Butlers PLC
MM Planning
Module Partitions
Module Partitions
Monks Cross North Consortium
Monks Cross Shopping Centre
Monks Cross Shopping Park Trust
Moor Monkton Parish Council
Moorside Developments Ltd
Mudd & Co
Mulberry Hall
Muncaster Residents Association
Murton Parish Council
Naburn Parish Council
NAM (Nature after Minerals)
Nathaniel Lichfield & Partners
National Centre of Early Music
National Farmers Union
National Federation of Bus Users
National Grid
National Grid Property Ltd
National Offender Management Service
National Rail Supplies Ltd
National Railway Museum
National Trust
Natural England
Navigation Residents Association
Nether Poppleton Parish Council
Nether Poppleton Parish Council
Network Rail
New Earswick Parish Council
Newsquest (York) Ltd
Newton on Derwent Parish Council
NFU North East
NHS
Niche Design Architects
Nixon Homes
NJL Consulting
NMSI Planning & Development Unit
North Yorkshire & York PCT
North Yorkshire County Council
North Yorkshire County Council Business & Environmental Services
North Yorkshire Forum for Voluntary Organisations
North Yorkshire Police
North Yorkshire Police Authority
NorthCountry Homes Group Ltd
Northern Gas Networks
Northern Rail
Northminster Developments Ltd
Northminster Ltd
Northminster Properties Ltd
Novus Investments Ltd
Npower Renewables
NTR Planning
O`Neill Associates
Oakgate Group PLC
Office of Government Commerce
Office of Rail and Road
Older Citizens Advocacy York
Older People's Assembly
O'Neil, Beechey, O'Neil Architects
O'Neill Associates
Opus Land Ltd
Osbaldwick Parish Council
Osbaldwick Parish Council & Meadlands Area Residents Association
Ove Arup & Partners Ltd
Overton Parish Council
P & O Estates
Park Grove Residents Association

Passenger Transport Network
Paul White Ltd
PB Planning
Peacock & Smith Ltd
Peacock and Smith
Peel Environmental Management (UK) Ltd &
North Selby Mine Waste Management Ltd
Peel Environments Ltd
Pegasus Group
Performing Live Arts York (PLAY)
Persimmon Homes
Persimmon Homes (Yorkshire)
Persimmon PLC
Philip Parker Planning Services Ltd
Piccadilly Autos
Pike Hills Golf Club
Pilcher Homes Ltd
Pilkington Group Limited
Pioneer
PLACE/Yorkshire Wildlife Trust
Places for People
Planinfo Research Team
Planning Potential
Planning Prospects Ltd
Planware Ltd
Plot of Gold Ltd
Pocklington and Wolds Gateway Partnership
Pocklington and Wolds Gateway Partnership
Polly Anna's Nursery
Poppleton Garden Centre
Poppleton Junior Football Club
Poppleton Road Memorial Hall
Poppleton Road Primary School
Poppleton Ward Residents Association
Portakabin Limited
Potts Parry & Ives Chartered Architects
Powergen Retail Ltd
Preliminary Planning Professionals Limited
Pre-School Learning Alliance
Probation Service
Ptarmigan Land Ltd
Purey Cust Nuffield Hospital
Quod
R S Cockerill (York) Ltd
R Thompson & Son
RA&QS Committee Of The Governing Body Of
Woodthorpe Community Primary School
Railway Heritage Trust
Railway Heritage Trust
Railway Housing Association
Ralph Butterfield Primary School
Ramblers Association (York Group)
Rapita Systems
Rapleys LLP
Rawcliffe Parish Council
Raymond Barnes Town Planning Consultant
Redrow Homes
Redrow Homes (North) Ltd
REIT
RenewableUK
rg+p Ltd
Richard Baxter Planning Consultant
Richmond Fellowship
River Foss Society
Road Haulage Association
Rolawn Ltd
Rollinson Planning Consultancy
Royal Institute of Chartered Surveyors
Royal Mail Group Legal (Real Estate)
Royal Mail Group Ltd
Royal Masonic Benevolent Institution (RMBI)
RPS Planning & Development
RSPB
RTPI Yorkshire
Rufforth with Knapton Parish Council
Rural Action Yorkshire
Rural Solutions
Rushbond Group
Ryedale District Council
S Harrison Developments Ltd
Safe and Sound Homes
Safer York Partnership
Safer York Partnership
Sainsbury's Supermarket Ltd
Salvation Army
Sandalwood Gates & Timber Products
Sanderson Weatherall
Sanderson Weatherall LLP
Sandringham Residents Association
Save Acomb Moor Campaign
Savills
SBO Lands
Scarcroft Residents Association
Science City York
Scott Wilson
Scottish Power
Scotts Property Ltd
Selby District Council
Shepheard Group Properties Limted
Shepherd Construction
Shepherd Design Group
Shepherd Engineering Services Ltd

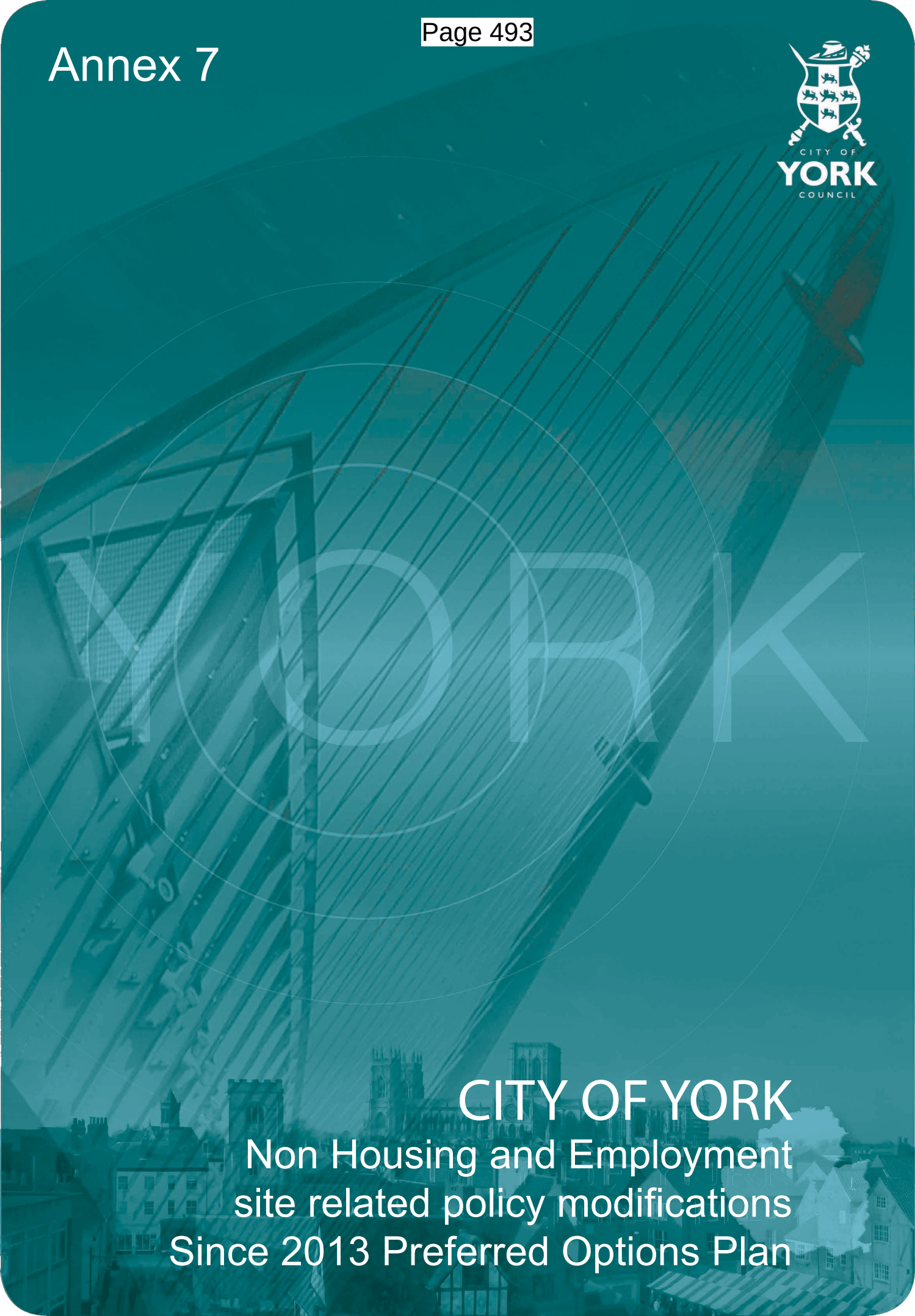
Shepherd Group Properties Ltd
Shepherd Homes
Sheriff Hutton Parish Council
Shirethorn Ltd
Showmans Guild of Great Britain
Siemens Transportation Systems
Signet Planning
Signet Planning Ltd
Simpson York Ltd
Skelton Consultancy
Skelton Parish Council
Skelton Village Action Group
Skelton Village Trust
Smith & Ball LLP
Smiths Gore
Society for the Preservation of Ancient Buildings
Spawforth Associates
Speedy Wine
Sport England
Sporting Knavesmire
Spurriergate Centre
SSA Planning Ltd
St Georges Place Residents Association
St Leonard's Hospice
St Mark's Church Rawcliffe
St Mary's Parochial Church Council
St Paul’s Square Residents Association
St Peter's School
St Sampson's Centre
Staff & Residents Of Dunnington Lodge Nursing Home
Stamford Bridge Parish Council
Starbucks Coffee Company
Stephen Ward Town Planning & Development Consultants Ltd.
Stephenson & Son
Stephenson & Son
Stephensons
Stillingfleet Parish Council
Stockholme Environment Institute
Stockton on the Forest Parish Council
Stone Soup
Storeys Edward Symmons
Storeys:ssp Ltd
Strathmore Estates
Stratus Environmental Limited
Strensall Conservation Group
Strensall with Towthorpe Parish Council
Sunshine Day Nursery (York) Ltd
Supersave Ltd
Sustrans
Sutton on the Forest Parish Council
Sutton upon Derwent Parish Council
SW Law Solicitors
SWLaw Solicitors Limited (incorporating Eric Cowsill Solicitors)
T H Hobson Ltd
Tang Hall and Heworth Residents
Tangent Properties
Tangerine
Taylor Wimpey
Taylor Wimpey UK Ltd & Linden Homes
Taylor Wimpey, Barratt/David Wilson Homes & T W Fields
Taylor Wimpey, Linden Homes & The Grimston Bar Development Consortium
Tees Valley Housing Group aka FABRIK
Tenet Group LTD
Terence O'Rourke
Terence O'Rourke Ltd
Tesco Stores Limited
Tetlow King Planning
TEV Ltd
The Castle Area Campaign Group
The Coal Authority Planning & Local Authority Liaison Department
The College of Law
The Co-operative Group
The Ellis Family & Skelwith Group
The Garden Centre Group
The General Store
The Georgian Group
The Helmsley Group Ltd
The Inland Waterways Association Ouse-Ure Corridor Section
The JTS Partnership
The Knapton & West York Green Belt Protection Group
The Land and Development Practice
The Landowners Consortium
The Lawn Tennis Association
The Lindum Group
The Merchant Taylors Of York & R & M Gorwood
The Minster Veterinary Practice
The Moor Lane Consortium
The National Federation of Gypsy Liaison Groups
The National Federation of Gypsy Liaison Groups
The Planning & Design Partnership

The Planning & Design Partnership
The Planning Bureau Limited
The Retreat Ltd
The River Foss Society
The Showmen's Guild of Great Britain
The Theatres Trust
The Trustees Of The Richardson & Penty Families
The War Memorial Trust
The Wendy House Children's Day Nursery
The Wilberforce Trust
Theatre Royal
Thirteen Group, Southdale Homes Ltd & Strata Homes Ltd
Thorganby Parish Council
Three
Tiger Developments
Tilstons Newsagents
Top Line Travel of York Ltd
Tower Estates (York) Ltd
Travellers Trust
Trustees Of Miss Beverley & The Jeffrey Family
Trustees of Mrs G M Ward Trust
Trustees Of W Bridge
Tullivers
Turley
Turley Associates
Turnberry Planning Limited
TW Fields
United Utilities Operations Limited
University of York
Upper Poppleton Parish Council
USS
Vale of York Clinical Commissioning Group
VALLI LLP
Vangarde
Vernon and Co
Victorian Society
Visit York
Vodafone and O2
Voluntary Sector Forum for Learning Difficulties
W A Fairhurst & Partners
W M Birch & Sons Ltd
W M Thompson (York Ltd)
Waites & Moorey Chartered Architects & Surveyors
Walker Morris LLP
Walmgate Community Association
Walmgate Day Nursery Ltd
Walton & Co
Ward Associates
Ward Associates Planning Consultants
Ward Associates Planning Consultants
Ward Hadaway Solicitors
Ware and Kay LLP
Warman Homes Ltd
Warthill Parish Council
Water Lane Ltd
Welcome to Yorkshire
Westfield Lodge Ltd & Crackmount Investments Ltd
Westgate Apartments
Wheatlands Community Woodland
Wheldrake Parish Council
White Young Green Planning
Whitkirk Investments Ltd
Wigginton Parish Council
William Birch & Sons
Willow Grove Residents' Association
Wimpey Homes
Without Walls (York Economic Partnership Board)
WM Morrison Supermarkets PLC
World Heritage Working Group
WR Dunn & Co. Ltd.
Wyevale Garden Centres
WYG
Yacro
Yew Tree Associates
York & Ainsty Hunt
York & District Citizens Advice Bureau
York & District Trade Council
York & North Yorkshire Chamber of Commerce
York & North Yorkshire Partnership Unit
York (Trenchard) Residents Company Ltd
York Access Group
York Ainsty Rotary Club
York and District Trades Union Council
York Arc Light
York Archaeological and Yorkshire Architectural Society
York Archaeological Forum
York Archaeological Trust
York Autoport Garage
York Blind & Partially Sighted Society
York Bridge Club
York Business Park Developments Ltd
York Carers Together
York Church of England Parishes

York City Centre Churches
York City Centre Ministry Team/York Workplace Chaplaincy/One Voice
York City Centre Partnership Ltd
York Civic Trust
York Coalition of Disabled People
York College
York Conservation Trust
York Consortium of Drainage Boards
York Council for Voluntary Service
York Council for Voluntary Service
York Cycle Campaign
York Cycle Show Committee
York Deanery Synod
York Designer Outlet
York Diocesan Board of Finance
York Diocesan Office
York District Sports Federation
York Environment Forum
York Environment Forum (Natural Environment Sub Group) & Treemendous York
York Georgian Society
York Gliding Centre Ltd
York Green Party
York Guild of Building
York Health Services NHS Acute Trust
York Hospitality Association
York Hospitals NHS Foundation Trust
York Housing Association
York in Transition
York Independant Living Network
York Lakeside Lodges
York Land Yacht Club
York Marina
York Merchant Adventurers Company
York Microlight Centre
York Minstermen
York Mosque
York Museums Trust
York Natural Environment Panel
York Natural Environment Trust
York Navigator Ltd
York Open Planning Forum
York Ornithological Club
York Ornithological Club
York People First 2000
York Practice Based Commissioning Group
York Professional Initiative
York Professionals
York Racecourse Committee
York Racial Equality Network
York Railway Institute
York Residential Landlords Association
York Residents` Federation
York St John University
York Teaching Hospital NHS Foundation Trust
York Tomorrow
York Tourism Strategy Steering Group
York Travellers Trust
York TV
York Youth Council
York@Large
York-Heworth Congregation of Jehovah's Witnesses
Yorkshire & The Humber Strategic Health Authority
Yorkshire Air Museum
Yorkshire Ambulance Service
Yorkshire Architectural and York Archaeological Society
Yorkshire Business Pride (City Centre Partnership)
Yorkshire Coastliner
Yorkshire Energy Partnership
Yorkshire Footpath Trust
Yorkshire Housing
Yorkshire Housing Group
Yorkshire Inland Branch of British Holiday & Home Parks Association
Yorkshire MESMAC
Yorkshire Naturalists Union
Yorkshire Philosophical Society
Yorkshire Water
Yorkshire Wildlife Trust
Yorkstories.co.uk
YorSpace
Yorvale Projects LLP & Maple Grove Developments Ltd
Yorvik Homes
Yorwaste Ltd
Youth Forum
Youth Service - V & I Coordinator

Names of Individuals are not included for Data Protection Reasons

Annex 7



CITY OF YORK

Non Housing and Employment site related policy modifications Since 2013 Preferred Options Plan

Schedule of Non Employment and Housing Sites/Growth Related Policies Modifications

Key to the Modifications:

Policy/Paragraph reference relates to 2014 publication draft plan presented to LPWG and Executive Members in September 2014
Proposed additional text is shown as underlined. Proposed deleted text is shown as ~~struck through~~.

Policy/Paragraph	Modification proposed	Reason
Section 1: Background		
Strategic Framework	Revisions to follow	
Spatial Portrait	Revisions to follow	
Section 2: Vision and Development Principles		
Vision	***York aspires to be a city whose special qualities and distinctiveness are recognised worldwide. The Local Plan aims to deliver sustainable patterns and forms of development to support this ambition and the delivery of the city's economic, environmental and social objectives. This will include ensuring that the city's place making and spatial planning polices reflect its heritage and contemporary culture, ~~spaces and archaeology can~~ contributing to the economic and social welfare of the community whilst conserving and enhancing its unique historic, cultural and natural environmental assets.*** ***The plan will ensure that the vision and outcomes are delivered in a sustainable way that recognises the challenges of climate change, protects residents from environmental impacts and promotes social, economic and cultural wellbeing. ~~inclusivity.~~***	To provide clarity and to strengthen culture in the plan.
Outcomes	Reorder to put protect the environment first.	To give this more prominence in the vision.
Outcomes	**~~Create Jobs and Grow the Economy~~ Create a Prosperous City for All**	To reflect the new Council Plan.
Para 2.1	The Local Plan will enable York to realise its economic growth ambitions as set out within	To reflect the

Policy/Paragraph	Modification proposed	Reason
	the City's Economic Strategy, contributing to a vibrant economy. This will include York fulfilling its role as a key driver in the Leeds City Region[1], York, ~~and~~ North Yorkshire and East Riding Local Enterprise Partnership (LEP) area ~~Sub Area~~ and the York Sub Area. In doing this York will have a key role in leading economic growth and job creation within the local area. ~~ensuring the success of the Growth Deals announced by the Government in July 2014 that have been negotiated by the Leeds City Region and York, North Yorkshire and East Riding Local Enterprise Partnerships'. These deals will bring additional investment to the City and greater flexibility in how public monies are used in support of economic growth.~~	York Economic Strategy and up to date position on the sub region and the LEPs.
Para 2.4	The Plan recognises the critical importance of York city centre as the economic, social and cultural heart of the area. By the end of the plan period, York city centre will have strengthened its role as a regional commercial, shopping, leisure, culture, tourism and entertainment destination through: • ensuring development contributes to the creation of a world class, high quality, accessible public realm; • increasing the supply of modern retail units, enhancing department store representation to attract a broader range and quality of multiple retailers to trade whilst enabling the growth of the already strong, quality, independent sector; • improving the tourism, cultural and leisure offer by ensuring a flexible approach to the use of land; • ensuring development sustains, enhances and adds values to York's culture; • developing an improved high quality affordable office space offer for small enterprises and start-ups in the arts, creative, digital media and related industries; • protecting and enhancing it's unique historic and cultural assets; • protecting and enhancing its existing office provision complemented by commercial development on the adjacent York Central site; and	To strengthen culture in the Local Plan.

[1] The Leeds City Region is a city region in the North of England centred on Leeds, West Yorkshire. The activities of the city region are coordinated by the Leeds City Region Partnership. Since 2011 economic development has been supported by the Leeds City Region Local Enterprise Partnership (LEP)

Policy/Paragraph	Modification proposed	Reason
	• pursuing improvements to sustainable transport infrastructure.	
Para 2.5	The higher and further education sector are ~~is~~ of key importance to the economy. The plan will help unlock the further potential of The University of York, York St John University, York College and Askham Bryan College of Agriculture and Horticulture, through development and redevelopment at their current sites, and facilitating the provision of new purpose built student accommodation both on and off site. The plan will also have a key role in facilitating the development of business 'spin off' from Further Higher Education institutions.	To add clarity.
Para 2.6	~~Through the development of identified Strategic Sites and secured through developer agreements, the Local Plan will deliver construction and development skills training for local people.~~	No longer a specific policy on construction development skills.
Outcomes	~~**Get York Moving**~~ **Ensure Efficient and Affordable Transport Links**	To reflect the new Council Plan.
Para 2.7	The Plan will help deliver a fundamental shift in travel patterns by: • ensuring that sustainable transport provision and travel planning is a key component of future development and subsequent operation; • promoting sustainable connectivity through ensuring that new development is located with good access to high quality public transport and to the strategic cycling and walking network; • reducing the need to travel, through ensuring that new development is located with good access to services; • provision of a new rail station~~s~~ at Haxby ~~and potentially Strensall~~; • helping to deliver the infrastructure to support sustainable travel; including the provision of safe new cycle and walking routes as part of a city wide network, high quality well located bus stops and secure cycle parking facilities, ~~new~~ rail and expanded/relocated park and ride facilities; and • managing private travel demand via car parking policies and other measures.	To update to reflect current position.

Policy/Paragraph	Modification proposed	Reason
Outcomes	~~**Build Strong Communities**~~ **Provide Good Quality Homes and Opportunities**	To reflect the new Council Plan.
Para 2.10	~~The Local Plan will prioritise tackling existing gaps, and prevent gaps from being created, in the provision of key services and public transport. By the end of the plan period it will be ensured that all residents in the main built up areas of York are able to follow low carbon sustainable lifestyles.~~	To add clarity.
Para 2.11	The Local Plan will protect and provide accessible and new varied opportunities for leisure and recreational activities in order to promote healthy lifestyles and improve wellbeing, including ensuring ~~all~~ residents living within the main built up areas of York have access to a range of well located recreational open spaces and sports facilities and safe walking and cycling routes to them. This is an essential part of creating happy, healthy and inclusive communities.	To add clarity.
Para 2.13	The built environment is the most tangible expression of a city's character and culture – its past, its present, its aspirations for the future. Over the plan period, the Local Plan will help York to safeguard its outstanding heritage for future generations by promoting development which respects the city's special character and contemporary culture and encourages opportunities for rediscovering and reinterpreting those assets which make it an attractive, beautiful and accessible city. Enhancing York's physical appearance, improving accessibility and improving its image and perception are vital if the city is to increase investment, employment, ~~and~~ wealth and wellbeing.	To strengthen culture in the Local Plan.
Para 2.14	The Plan will do this by supporting design excellence in ~~through~~ the conservation and enhancement of the following six defining characteristics of York's built environment: • strong urban form; • compactness; • landmark monuments; • unique architectural character; • archaeological complexity; and • landscape setting.	To add clarity.
Para 2.15	York's future and past are interdependent, and both heritage and innovation are important for the city's future success and wellbeing. The city's unique historic character and setting	To add clarity and provide an

Policy/Paragraph	Modification proposed	Reason
	is an essential component of its continued economic success as well as being valuable in its own right. York's outstanding architectural and archaeological heritage contribute to the city's special significance, distinctiveness and sense of place. The Local Plan will ensure that the city's heritage assets are preserved and enhanced. These assets include the architecture and archaeology of its historic centre, its skyline, views, street patterns, the Minster and its precinct, the Medieval and Roman walls, Clifford's Tower, Museum Gardens and other open spaces. York is also a UNESCO City of Media Arts, and it is equally important that York increasingly becomes, and is perceived as, a forward-looking and creative city, one that values learning, retains its graduates, attracts investment, and supports its creative, digital, and innovative industries. In this, place-based and proactive spatial planning and the encouragement of excellent design in buildings and public spaces, have an important role to play. The Local Plan will ensure that the city's arts and cultural assets are protected and enhanced, with new assets and resources created whenever possible. Beyond the city centre, the key radial routes are of particular importance, and the surrounding villages and Green Infrastructure, including its valued strays, river corridors and open spaces that contribute to the city's setting. The primary function of York's Green Belt will be to preserve its setting and special character.	update.
Para 2.17	By the end of the plan period York's Green Infrastructure, including open space, landscape, geodiversity, biodiversity and the natural environment, will have been both conserved and enhanced. Its role in promoting the city's economic, cultural and social aspirations, particularly in terms of contributing to a beautiful, legible, accessible and healthy city, will have been optimised.	To add clarity and strengthen culture in the plan.
Para 2.19	The Local Plan will respond to the opportunities offered by the city's natural resources whilst at the same time protecting current and future residents from environmental impacts. It will: • ~~reduce York's eco-footprint~~ help York become a sustainable, resilient and collaborative 'One Planet' city ; • ~~support reducing energy use and carbon generation, meeting ambitious renewable energy targets and ensuring that both housing and commercial development is designed and constructed in a sustainable way~~ create energy efficient buildings, support the use of energy from renewable sources,ensuring York is climate ready;	To reflect One Planet York principles

Policy/Paragraph	Modification proposed	Reason
	• ensure that new development is not subject to, nor contributes unacceptable levels of flood risk including from the Rivers Ouse, Foss and Derwent and other sources, does not result in increased flood risk elsewhere and, where possible, achieves reductions in flood risk overall; • ensure that new development <u>uses water efficiently and</u> delivers sustainable drainage solutions; • support measures to help reduce the emissions of Nitrogen Dioxide, Particulate, Carbon Dioxide and other greenhouse gases from both transport and other sources; • contribute to the reduction of waste through supporting innovation and improvement of current waste practices, promotion of recycling and set the principles for the future provision of suitable and accessible sites; • set guidelines for the safeguarding of mineral deposits and reduce the use of non renewable resources; • ensure that any development will not introduce risk to the health of current and future residents or create problems with property and it's surrounding environment; and • safeguard water resources and to protect and improve water quality with an overall aim of getting water bodies to 'good' status under the Water Framework Directive.	
Paras 2.20 and 2.21	~~The Council's planning strategy is based on delivering sustainable development as described by the Vision set out in paragraphs 2.1 to 2.19 above. An important part of this is to consider York's role in its wider functional sub area. There has been ongoing interaction between the York Local Plan area and adjoining plan areas. This has been fully explored through the Duty to Co-operate and the plan's policies reflect the outcomes of this. The section of the document details the policies and development principles which will help deliver the vision. These include:~~ • ~~Policy DP1 - the approach taken to development which reflects the role of the York Sub Area;~~ • ~~Policy DP2 - the basic development principles that arise from the vision which underpin the strategic policies in each of the subsequent sections of the plan; and~~ • ~~Policy DP3 - the key development principles pertinent to quality 'sustainable~~	For consistency with the format of the rest of the plan.

Policy/Paragraph	Modification proposed	Reason
	~~communities' that will also guide the Council in its consideration of all development proposals.~~ ~~These policies are supplemented by Policy DP4 which sets out the Council's overall approach to development management which is to take a positive approach in favour of sustainable development, work proactively with applicants meaning proposals can be approved where possible, and to secure development that improves economic, social and environmental conditions in the area.~~	
Policy DP1: York Sub Area	The approach taken in the Local Plan to development will reflect the roles and functions of place in the Leeds City Region, York Sub Area and York, North Yorkshire Sub Region. It will aim to ensure the following. i. York fulfils its role as a key economic driver within both the Leeds City Region and <u>the York, North Yorkshire and East Riding LEP area.</u> ~~and the York and North Yorkshire Sub Region.~~ ii. York city centre's role as a shopping and leisure destination within the wider Yorkshire and Humber area is strengthened. iii. The housing needs of City of York's current and future population including that arising from economic and institutional growth is met within the York local authority area. iv. The further success of regionally and sub regionally important higher and further education institutions within the plan area is supported. v. City of York's role as a key node for public transport is strengthened, including improvements to the Leeds-York-Harrogate rail line, improvements to the outer ring road; improved access between York and Scarborough (the east coast) and projects to improve national connectivity, including links to the new high speed rail system (HS2). vi. City of York's outstanding historic and natural environment is conserved and enhanced recognising its wider economic importance to increased investment, employment and wealth within both the Leeds City Region and the York, North Yorkshire <u>and East Riding LEP area</u> ~~Sub Region~~.	To reflect the up to date position on the sub region and LEPs

Policy/Paragraph	Modification proposed	Reason
	vii. The integrity of important landscapes, biodiversity and areas of environmental character (including the network of strategic green corridors) that extend beyond the City of York boundaries are safeguarded. viii. A Green Belt is defined around York which will safeguard the special character and setting of the historic city, the outer boundary of which will be 6 miles from the city centre. ix. Development within the City of York area will not lead to environmental problems including flood risk, poor air quality and transport congestion for adjacent local authority areas.	
Para 2.22	The influence of the City of York has throughout history extended beyond its immediate boundaries and the Council has a long history of joint working and cooperation with its neighbouring authorities to achieve better spatial planning outcomes. The York Sub Area was identified in the Yorkshire and Humber Plan: Regional Spatial Strategy to 2026 (2008) (RSS). Further analysis has been carried out as part of the York Sub Area Study (2011) which determines the nature and extent of functional relationships between different places in the York area. Figure 2.1 overleaf shows the York Sub Area as defined in the sub area study. This confirms that the functional areas approach to understanding and addressing strategic spatial priorities agreed in the RSS remain valid, including the role of York and its sub area. This policy defines the city's role within the York Sub Area and wider Sub Region. More specifically it identifies: • the critical importance of the York economy to the Sub Area and its role within the wider Leeds City Region and York and North Yorkshire Sub Region; • the economic role of York in helping to deliver the ambitions of the Leeds City Region and York, North Yorkshire and East Riding LEP, ~~Local Enterprise Partnership~~ as set out in their respective ~~Growth Deals and~~ Strategic Economic Plans; • the importance of conserving and enhancing York's unique environment; • the benefits of improved transport connectivity; • the importance of ensuring that growth and development in York does not have negative impacts on neighbouring authorities; • the important service role of the city to its wider hinterland; and	To reflect the up to date position on the sub region and LEPs

Policy/Paragraph	Modification proposed	Reason
	• support for the destination role of the city.	
Policy DP2: Sustainable Development	Sub headings amended as follows: Development will help **Create <u>A Prosperous City for All</u> ~~Jobs and Grow the Economy~~** through... Development will help **<u>Ensure Efficient and Affordable Transport Links</u> ~~Get York Moving~~** through.... Development will help **<u>Provide Good Quality Homes and Opportunities</u> ~~Build Strong Communities~~** through...	To reflect the new Council Plan.
Policy DP2: Sustainable Development	Reordered to put protect the environment first	To give the environment more prominence in the vision.
Table 2.1	Delete list of policies table.	Not considered necessary.
Section 3: Spatial Strategy		
Policy SS2: The Role of York's Green Belt	i. The primary purpose of the Green Belt is to preserve the setting and the special character of York and delivering the Local Plan Spatial Strategy. New building in the Green Belt is inappropriate unless it is for one of the exceptions set out in policy GB1. ii. The general extent of the Green Belt is shown in the Key Diagram. Detail boundaries shown on the proposals map follow readily recognisable physical features that are likely to endure such as streams, hedgerows and highways. iii. To ensure that there is a degree of permanence beyond the plan period sufficient land is allocated for development to meet the needs identified in the plan ~~and further land is safeguarded to provide a reserve of land that can be brought forward for development through a plan review, should such land be required. Planning permission for development on safeguarded land will only be granted following a plan review~~.	Safeguarded land is no longer proposed to be designated in the plan.
Para 3.13	The boundary of the Green Belt is the consequence of decisions about which land serves	To reflect the up

Policy/Paragraph	Modification proposed	Reason
	a Green Belt purpose and which can ~~either~~ be allocated for development ~~or safeguarded for longer term development needs beyond the plan period~~. <u>The Plan seeks to identify sufficient land to accommodate York's development needs across the plan period, 2012-2033. In addition, the Plan provides further development land to 2038 (including allowing for some flexibility in delivery) and establishes a green belt boundary enduring 20 years.</u> In this Local Plan the Green Belt's prime purpose is that of preserving the setting and special character of York. This essentially comprises the land shown earlier in the section at Figure 3.1.	to date plan period. Safeguarded land is no longer proposed to be designated in the plan.
Policy SS3: The Creation of an Enduring Green Belt	Policy deleted.	Safeguarded land is no longer proposed to be designated in the plan.
Section 4: Economy and Retail		
Policy EC2: Economic Growth in the Health and Social Care Sectors	Policy deleted from section 4, now covered in new public health section.	To reflect the new Council Plan.
Policy EC3: Loss of Employment Land	**Policy EC~~3~~<u>2</u>: Loss of Employment Land** When considering proposals ~~uses~~ which involve the loss of land and/or buildings which are either identified, currently used or were last used for ~~industrial, business, office or other~~ employment uses, the council will expect developers to provide a statement to the satisfaction of the Council demonstrating that: i. the existing land and or buildings are demonstrably not viable in terms of market attractiveness, business operations, condition and/or compatibility with adjacent uses; and ii. the proposal would not lead to the loss of a deliverable employment site that that is necessary to meet employment needs during the plan period.	Renumbered to reflect that the policy on health and social care has moved section. Text changes for clarity

Policy/Paragraph	Modification proposed	Reason
Policy EC4: Business and Industrial Uses within Residential Areas	**Policy EC4~~3~~3: Business and Industrial Uses within Residential Areas**	Renumbered to reflect that on health and social care has moved sections.
Policy EC5: Tourism	**Policy EC~~5~~4: Tourism**	Renumbered to reflect that on health and social care has moved sections.
Para 4.13	~~The aim of York's Tourism Strategy (Interim Document 2014) is a doubling of the value of tourism to the economy, which means a £1billion industry creating an additional 2,000 jobs. The strategy suggests that this will be achieved through: encouraging more business visitors for conferences and meetings, extending the length of stay for both leisure and business customers; increasing the spend of domestic day and staying visitors, increasing overseas leisure and business visitors and tackling seasonality.~~	Document only in draft and has been superseded by the Economic Strategy
Para 4.14	~~In this policy,~~ A key aim of the Council's Economic Strategy (2016) is to continue to creatively develop York's tourism and culture offer and to raise the city's profile as a quality visitor destination. Tourism, leisure and cultural developments should be directed towards the city centre or other particularly significant attraction locations like York Racecourse with its conferencing facilities. Where suitable sites are not available in the city centre, sites in edge- of-centre locations will be considered and, if no suitable sites are available in any of the preferred locations, out-of-centre sites will be considered. Where edge-of-centre or out-of-centre sites are considered, preference will be given within each category to accessible sites that are well connected to the city centre.	To update with new Economic Strategy.
Para 4.15	Hotels are a defined as a town centre use and they play an important role in supporting the economic well being and vibrancy of York's city centre. Appropriately located accommodation is important. Further, the city centre is a sustainable location which is accessible by a range of transport modes. This policy ~~seeks to~~ supports the role of the city centre as the primary location for hotels.	To strengthen the wording.
Policy EC6: Rural	**Policy EC~~6~~5: Rural Economy**	Renumbered to

Policy/Paragraph	Modification proposed	Reason
Economy		reflect that on health and social care has moved sections.
Policy R1: Retail Hierarchy and Sequential Approach	The vitality and viability of the city centre, district and local centres and neighbourhood parades will be maintained and enhanced. The existing network will form the focal point for uses, services, and facilities serving the surrounding population. The scale, character and role of the centres defines their position within the hierarchy. The network of centres within the district is as follows, as identified on the proposals map: • York city centre; • district centres; • local centres; and • neighbourhood parades. In order to safeguard and enhance the established retail hierarchy any proposals for additional retail provision outside the defined city, district and local centres will be subject to the requirements set out in Policy R4. Main town centre uses will be directed to the city, district and local centres ~~and neighbourhood parades~~ defined in this policy and in accordance with other Local Plan policies in relation to specific uses. Proposals for main town centre uses outside a defined city, district or local centre must be subject to an impact assessment where the floorspace of the proposed development exceeds the following thresholds: • outside York city centre: greater than 1,500 sqm gross floorspace. • outside a district centre: greater than 500 sqm gross floorspace. • outside a local centre: greater than 200 sqm gross floorspace.	To ensure compliance with the NPPF.

Policy/Paragraph	Modification proposed	Reason
	Advice should be sought from the Council in relation to which defined centre/s the impact is likely to be on, which will be linked to the nature of the proposal and proximity to defined centre/s. Applicants should seek to agree the scope of the impact assessment which should be appropriate to the scale and nature of the proposed development and to identify any specific local issues. An impact assessment may be required below these thresholds where a proposal would have an independent or cumulative impact on the vitality and viability including local consumer choice and trade on a defined centre nor have a significant impact on existing, committed and planned public and private investment in defined centres.	
Policy R2: District, Local and Neighbourhood Centres	**Policy R2: District~~,~~ and Local Centres and Neighbourhood Parades ~~Centres~~** For development proposals for main town centre uses within any of the district and local centres and neighbourhood parades defined in Policy R1 (as identified on the proposals map) the ~~Local Planning Authority will have~~ Regard will be had to enhancing the function, vitality and viability of the centres and parades. Development proposals for main town centre uses will be considered acceptable in principle providing that it: • consolidates, maintains or improves upon the function, vitality and viability of the centre or parade in relation to its retail, cultural and community facilities; • is of an appropriate scale and nature to the existing centre and the retail hierarchy, maintains or enhances the character and environmental quality of the centre or parade; • contributes positively to the range of services on offer; and • does not have a significant detrimental impact upon local residents or the historic and natural environment. Development proposals for main town centre uses outside defined district and local centres that would result in significant adverse impact on the continued or future function, vitality and viability of a centre will be refused. Neighbourhood Parades make a major contribution to the sustainability and cohesion of their local communities, their vitality and	For clarity To strengthen approach to neighbourhood

Policy/Paragraph	Modification proposed	Reason
	viability should also be protected, where possible, from adverse impact from any adjacent retail development.	parades
Para 4.32	**Neighbourhood Parades ~~Centres~~** Within ~~the Local Authority area~~ York there are a number of neighbourhood parades comprising small parades of shops that cater for the day to day needs of the immediate local population. As such these parades have been included within the retail hierarchy and the vitality and viability of the parades will be protected. These shops fulfil a vital need for many residents without access to a car or who are reluctant to travel to the larger centres. Neighbourhood parades can provide local services in sustainable locations, such as convenience, hairdressers and cafes and these cater for different communities. These parades make a major contribution to the sustainability and cohesion of the communities and neighbourhoods.	For clarity
Policy R3: York City Centre Retailing	The vitality and viability of the city centre is supported and enhanced, with the Primary Shopping Area (PSA) as shown on the proposals map and allocated sites providing the primary focus for any new retail floorspace. The PSA is defined as the area where retail development is concentrated and covers all primary shopping frontages and those secondary shopping frontages that are contiguous and closely related to the primary shopping frontage. New floorspace and support for existing retailers will be achieved through: • the ~~allocation~~ designation of Castle Gateway ~~Piccadilly~~ as an area of opportunity, promoted for high quality mixed use development, including main town centre uses to support and enhance the offer within the PSA; • supporting additional retail provision on secondary frontages in Hungate and the Stonebow area; • the reuse, reconfiguration and development of existing units (subject to historic building and conservation constraints) to create additional floorspace and enable existing retailers to adapt to social and economic trends; • ensuring the efficient use of land and buildings and support and provision of managed changed in the PSA to concentrate retailer uses towards prime areas within the PSA; • supporting Newgate Market and occasional / festival markets in York;	For clarity and to reflect the renaming of the Castle Piccadilly regeneration area.

Policy/Paragraph	Modification proposed	Reason
	• managing the provision of parking and public transport within the city to ensure that it supports the vitality of the centre; and • improving the quality and appearance of the city centre, through the provision of improvements to public realm and city centre management of areas within the city centre.	
Para 4.35	**Primary and ~~Shopping~~ Secondary Frontages** Primary shopping frontages are defined on the proposal map and reflect the current concentration of retail activity in York city centre around Parliament Street, Davygate, Coney Street, High Ousegate, Market Street, Shambles, Low Petergate, Blake Street and Stonegate.	To reflect updated work on shopping streets following assessment of consultation responses.
Para 4.36	Beyond the primary shopping frontages, the proposals map identifies the secondary shopping frontages, including streets such as Lendal, ~~Blake Street, Stonegate Low Petergate~~, Swinegate and Grape Lane. These areas are well connected to the primary shopping areas and whilst also having a predominantly retail character, they contain other complementary uses such as leisure service, financial services and community uses which add to the wider diversity.	To reflect updated work on shopping streets following assessment of consultation responses.
Para 4.37	A changing town centre environment is recognised, where non retail ~~A1~~ uses (use class A1) contribute to a much greater role in competitive town centre where shopping activity is becoming more of a leisure activity where use class A3 and A4 food and drink uses operate alongside and complement traditional shopping facilities. However it still remains important to manage the proportion of non A1 uses in the primary and secondary frontage to ensure that other uses support and do not dominant the primary retail function of the area to ensure the future vitality and viability remains. This is further required given the increased competition from out-of-centre retail facilities to ensure the integrity of the retail of the city centre is not diminished	For clarity.
Policy R4: Out of Centre Retailing	Proposals for out of centre retailing will only be permitted where it: • cannot be accommodated in a sequentially preferable location in accordance with	For clarity.

Policy/Paragraph	Modification proposed	Reason
	Policy R1; • will not result in a significant adverse impact on existing, committed and planned public and private investment in York city centre, and other relevant defined centres in the catchment area of the proposed development; and • will not result in an individual or cumulative (significantly adverse) impact on the vitality and viability of any defined centre including local consumer choice and trade in the centre and wider area up to five years from the time the application is made.~~; and~~ • ~~is in accordance with other policies within the local plan, and national guidance, as appropriate~~ Restrictions on floorspace or goods sold will be secured by condition to prevent out of centre proposals having a negative impact on the vitality and viability of the city centre.	
Para 4.43	**Monks Cross** Monks Cross Shopping Park is located to the north of the city on the outer ring road; the shopping park consists of a number of high street retailers, two large supermarkets, a number of retail warehouses, restaurants and cafes and a leisure centre and stadium. Surrounding the shopping park are further retail warehouses, trade counters, car showrooms, business and offices, and industrial areas. In 2012 further development involving the redevelopment of the Stadium and a large scale retail development were permitted to the south of the existing shopping park. This expansion of the retail offer is open and trading and will ~~have an adverse impact upon the trade and turnover of the city centre and also~~ absorb a substantial proportion of retail floorspace growth within the plan period. In March 2015, permission was granted for the provision of the Community Stadium, associated community hub and further retail and leisure development including retail units, restaurant units and a cinema. Careful evaluation of the impact of this development is required and no further out-of-centre floorspace is being allocated at this stage with out of centre development instead being dealt with through Policy R4.	To provide an update.
Section 5: Housing		
Para 5.2	It is important that the Local Plan delivers not only sufficient housing but also the right type and mix of housing to meet the city's needs, this means ensuring sufficient housing is provided to meet the needs of those requiring affordable housing, specialist housing,	To reflect new policy and for clarity in

Policy/Paragraph	Modification proposed	Reason
	homes for young people, older persons accommodation, Gypsies, ~~Roma,~~ Travellers and Travelling Showpeople, student housing and Houses of Multiple Occupancy (HMO). It should be recognised that households can have a complex set of needs and abilities. It is preferential to keep people living where they need to be as far as possible; should that be in their own purchased home, rental property or a form of specialist accommodation, whatever their age or disability. As such it is important that the mix and type of housing that is delivered in the plan period provides sufficient choice to meet the broad range of housing needs in the city.	terminology.
Policy H3: Balancing the Housing Market	The Council will seek to balance the housing market across the plan period and work towards a mix of housing identified in the Strategic Housing Market Assessment (SHMA). Proposals for residential development ~~are~~ will be required to balance the housing market by including a mix of types of housing which reflects the diverse mix of need across the city. ~~as defined by the most up to date Strategic Housing Market Assessment (SHMA)~~. This includes flats and smaller houses for those accessing the housing market for the first time, family housing of 2 to 3 beds and homes with features attractive to older people. The housing mix proposed should have reference to the SHMA and be informed by: • up to date evidence of need, including at a local level; and • the nature of the development site and the character of the local surrounding area. The final mix of dwelling types and sizes will be subject to negotiation with the applicant. Applicants will be required to provide sufficient evidence to support their proposals. Proposals will be supported that are suitable for the intended occupiers in relation to the quality and type of facilities, and the provision of support and/or care. ~~Individual sites will be expected to reflect the needs of the SHMA, subject to site specific circumstances and the character of the local area~~. Housing should be built as flexible as possible to accommodate a broad cross section of society to help meet a wide range of needs.	To merge policy H3 and H4 together for clarity.
Para 5.17	The NPPF seeks to ensure that local housing needs are met through the provision of a range of house types and sizes based on current and future demographic trends, market	To merge policy H3 and H4

Policy/Paragraph	Modification proposed	Reason
	trends and the differing needs of the various sectors of the community. Local Authorities are required to identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand. Whilst it is important to provide more homes within York, there is a need to consider housing quality and choice in order to help future proof communities and help deliver mixed neighbourhoods.	together for clarity.
New paragraph	There will be a range of factors which influence demand for different sizes of homes over time, particularly demographic changes, housing affordability and the wider economic performance of the city. The council has undertaken a SHMA which has estimated the sixe of market and affordable homes required over the plan period. The SHMA identifies that for both market and affordable housing there is a need for a mix of house sizes across the city. The SHMA suggests that the focus of new housing provision should be on two and three bed properties reflecting the continued demand for family housing and the demand from older persons wishing to downsize but still retain flexible accommodation. A development should provide a mix of housing in appropriate locations and where there is an identified need through the SHMA.	To reference updated evidence base.
Para 5.18	As recognised in Policy H3, neighbourhoods should reflect the diversity found across the city, rather than clustering similar groups together. In order to balance the housing market there is a need to ensure a mix of types of housing across a development. This includes incorporating a range of housing type and sizes in a development to cater for small families, newly forming households and people looking to downsize as well as specialist housing provision for vulnerable people. Particular groups of people in mind are older people (including the frail elderly and those with dementia), people with disabilities and others who may, for a variety of reasons, be excluded from or find it more difficult to integrate with, the local community. ~~Where possible, housing should be designed flexibly so that it can be adapted to meet alternative housing uses as needs change in the future. Forms of housing covered under this policy include supported housing for young people, individuals with mental or physical health issues, homeless households, sheltered housing, residential care, nursing homes and extra care facilities.~~	To add clarity.
Para 5.19	Forms of housing covered under this policy include supported housing for young people, individuals with mental or physical health issues, homeless households, sheltered housing, residential care, nursing homes and extra care facilities. Where possible, housing should	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	be designed flexibly so that it can be adapted to meet alternative housing uses as needs change in the future. ~~A development should provide a mix of housing in appropriate locations and where there is an identified need through the SHMA. Clustering of large 4 -5 bed homes should be resisted in favour of 2 – 3 bed homes, where viable. Housing which is intended to enable people to live as independently as possible, but is designed so that support can be provided to them.~~ Such housing should be provided across the city, as opposed to being concentrated in certain areas, to help to enable people moving into such accommodation to remain in their local area and to create and maintain balanced communities.	
New paragraph	Demographic projections show an ageing population resulting in an increased need for housing that meets the needs of older people: this includes housing to enable them to live independently, sheltered housing, extra care accommodation and care homes. Policy H9 Older Persons Accommodation seeks to address the specific housing requirements of older people.	To reflect the housing white paper and new Policy H9.
Para 5.20	~~It is important that the market is able to react to changes in economic circumstances and patterns of demand. However it is also important to guard against any drift towards relative shortfalls or excesses of supply of particular kinds of dwelling that reflect the short-term aspirations of developers rather than longer-term community interests~~. In determining planning applications the council will have regard to the overall need to deliver a mix of house sizes, the ability of specific sites to accommodate this, the character and existing stock of the area as well as the most up to date evidence of need/demand. The final mix of housing will be subject to negotiation with the applicant.	To add clarity.
Policy H4: Housing Mix	Delete policy and merge with Policy H3: Balancing the Housing Market	To add clarity.
Policy H5: Promoting Self Build	**Policy H~~5~~4: Promoting Self ~~Build~~ and Custom House Building** As part of meeting housing need, proposals for self~~- build~~ and custom house building, to be occupied as homes by those individuals, will be supported where they are in conformity with all other relevant local and national policies. On ~~the four largest~~ strategic sites (sites 5ha and above) developers will be required to	To reflect the housing white paper.

Policy/Paragraph	Modification proposed	Reason
	supply at least ~~make available land to provide for a minimum of~~ ~~2~~5% of dwelling plots for sale to self builders or to ~~homes to~~ ~~be delivered on the site by~~ small/custom house builders subject to appropriate demand being identified. Plots should be made available at competitive rates, to be agreed through Section 106 agreements, which are fairly related to associated site/plot costs. In determining the nature and scale of provision the Council will have regard to viability considerations and site-specific circumstances These schemes will: • be individually designed employing innovative approaches throughout that cater for changing lifetime needs; • provide for appropriate linkages to infrastructure and day to day facilities; and • include a design framework to inform detailed design of the individual units where more than one self/custom build unit is proposed. Where a developer is required to provide self and custom build plots the plots should be made available and marketed for at least 12 months. Where plots have been appropriately marketed and have not sold within this time period these plots may be built out as conventional plots for market housing by the developer. Communities preparing Neighbourhood Plans will be encouraged to consider the identification of sites for self and custom build projects within their neighbourhood plan area. ~~Self build and custom house build proposals will be encouraged as part of this small house-builder requirement. The four largest strategic sites, as shown on the proposals map, are as follows:~~ • ~~ST15: Whinthorpe;~~ • ~~ST7: East of Metcalfe Lane;~~ • ~~ST14: Land to North of Clifton Moor; and~~	

Policy/Paragraph	Modification proposed	Reason
	• ~~ST8: Land north of Monks Cross~~	
Para 5.23	The Council is seeking to find new ways to deliver the homes York needs. This policy is intended as a mechanism for supporting self and custom build development in appropriate locations as sought in national policy. This policy approach will strengthen and grow the local economy and workforce, increase annual delivery rates on site and result in a more varied and locally distinctive development form. ~~One way of doing this is to help small builders and self/ custom house~~ builder's access land on which to build new homes. ~~This policy sets aside a small proportion of the four largest strategic sites in the Plan to provide opportunities for this type of provision. For the purposes of this policy small house builders are defined as being a company, joint venture or delivery vehicle which, alone or in conjunction with any parent or partner organisation, has delivered an average of under 200 residential units per annum over its last five operating years. Preference should be given in selection process to those small house builders who are unlisted and who have been established in the York or Yorkshire area for more than two years. Self builders are individuals or an organised group who wish to build their own home, project manage the building or in some cases work in conjunction with a building company (sometimes referred to as custom building).~~ The Council will maintain a local register of self builders who wish to acquire a suitable plot of land to build their own home, to evidence demand.	To reflect the housing white paper.
New paragraph	A self build scheme should be genuinely innovative in the use of materials, methods of construction and its contribution to protecting and enhancing the environment. The value of such a building will be found in its reflection of a high standard of contemporary architecture, the enhancement of its immediate setting and sensitivity to the defining character of the local surrounding area. Opportunities for pooled renewable energy facilities should be utilised where possible.	To add clarity.
Para 5.24	Where developable plots are demonstrably and appropriately marketed at competitive rates for a period of ~~more than 24~~ 12 months without interest, they may revert to delivery through conventional methods. ~~This policy approach will strengthen and grow the local economy and workforce, increase annual delivery rates on site and result in a more varied and locally distinctive development form.~~ Developers will be required to demonstrate to the local planning authority that appropriate marketing has taken place before self and custom build plots can be released for development through conventional market housing.	To add clarity.

Policy/Paragraph	Modification proposed	Reason
New paragraphs	Planning permissions relating to self-build plots will require self build developments to be completed within three years of a self-builder purchasing a plot. Self or custom build housing is subject to the requirements of the City of York Local Plan, including affordable housing; housing mix and density; older people's housing; space standards; and design and planning obligations Further guidance from the government on self build is expected. The council will review the need to publish additional local guidance/supplementary planning guidance relating to the practical delivery of self/custom build sites. Any future updates of this evidence will be published on the council's web site. **Definitions of Self and Custom Build** For the purpose of this policy self house builders are being defined as, someone who directly organises the design and construction of their new home i.e. DIY self build home. This can also include: projects where the self builder commissions an architect/ contractor to build their home; projects delivered by kit home companies; or community led projects where the community organises construction work. For the purpose of this policy custom build projects are where someone who works with a specialist developer to help deliver their new home. In this scenario, the custom builder may secure the site for you and manage the build of your home. For the purpose of this policy the terms custom and self build relate to a range of dwellings which may be based on: • Self build homes: Where a person manages the design and construction and may undertake some of the building work or contract it to others; • Contractor built homes, after deciding on a design, a contractor is employed to do all of the building work; • Independent community collaboration where a group of people acquire a site and split into plots for self build homes, which may include sharing labour and expertise; and	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	• Supported community self build where a social landlord or a similar supportive body helps people build a group of homes together. For the purposes of this policy small house builders are defined as being a company, joint venture or delivery vehicle which, alone or in conjunction with any parent or partner organisation, has delivered an average of fewer than 200 residential units per annum over its last five operating years. Preference should be given in selection process to those small house builders who are unlisted and who have been established in the York or Yorkshire area for more than two years. Homes built to a customer's specification by a developer, based on a range of their designs, do not represent a custom-build home.	
Policy H5: Gypsy, Roma, Traveller and Travelling Showpeople Sites	Delete policy and cover in two new policies, H5: Gypsy and Travellers and H6: Travelling Showpeople.	To add clarity.
New Policy H5: Gypsy and Travellers	Safeguarding Existing Supply Proposals which fail to protect existing Gypsy and Traveller sites or involve a loss of pitches/plots will not be permitted unless it can be demonstrated that they are no longer required or equivalent alternative provision can be made. Existing Gypsy and Traveller sites are shown on the proposals map, and are listed below: • James Street, Layerthorpe; • Water Lane, Clifton; and • Outgang Lane, Osbaldwick; Meeting Future Need	To reflect updated evidence base.

Policy/Paragraph	Modification proposed	Reason
	In order to meet the accommodation needs of Gypsies and Travellers, provision will be made in the following ways: a) Within Existing Local Authority sites In order to meet the need of Gypsies and Travellers that meet the planning definition, 3 additional pitches will be identified within the existing three Local Authority sites. b) Within Strategic Allocations In order to meet the need of those 44 Gypsies and Traveller households that do not meet the Planning definition: Applications for larger development sites of 5 ha or more will be required to: • provide a number of pitches within the site; or • provide alterative land that meets the criteria set out in part (c) of this policy to accommodate the required number of pitches; or • provide commuted sum payments to contribute towards to development of pitches elsewhere. The requirements for this policy will be based on the hierarchy below: 100-499 dwellings - 2 pitches should be provided 500-999 dwellings - 3 pitches should be provided 1000-1499 dwellings - 4 pitches should be provided 1500-1999 dwellings - 5 pitches should be provided 2000 or more dwellings - 6 pitches should be provided Section XX contains site specific policies for the strategic sites including the delivery of the requirements above.	

Policy/Paragraph	Modification proposed	Reason
	c) Planning applications In addition to the above allocated sites, development for Gypsy and Traveller sites will be permitted where proposals: i. do not conflict with the objective of conserving and enhance York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function; ii. ensure accessibility to public transport and services; iii. are suitable in terms of vehicular access and road safety including internal space for adequate parking and turning; iv. ensure that development does not lead to unacceptable levels of congestion, pollution, and air quality for surrounding residents and future occupiers; and v. appropriately manage flood risk. In addition, proposals will be expected to: vi. provide adequate provision for storage, recreation space, amenity provision and utility services; vii. ensure that the size and density of pitches/plots are in accordance with best practice guidance; viii. incorporate appropriate landscape proposals to have a positive influence on the quality and amenity of the development; ix. ensure that residents living nearby are not unduly affected by noise, disturbance or overlooking; and x. ensure future occupiers would not be subject to significant adverse environmental impacts. Any permission granted for a Gypsy and Traveller development will be subject to a condition limiting occupation to Gypsies and Travellers, as appropriate.	

Policy/Paragraph	Modification proposed	Reason
New Policy H6: Travelling Showpeople	Safeguarding Existing Supply Proposals which fail to protect existing Travelling Showpeople yards or involve a loss of pitches/plots will not be permitted unless it can be demonstrated that they are no longer required or equivalent alternative provision can be made. Existing Travelling Showman yards are shown on the proposals map, and are listed below: • The Stables, Elvington (temporary permission until 2020); Meeting Future Need There is a total need of 3 Showpeople plots over the plan period (this includes the plot with temporary planning permission at The Stables). This is split into 2 plot in years 2016-21, and 1 plot in the period 2032. a) Allocated Sites In order to meet the need of Travelling Showpeople that meet the planning definition, 3 plots will be allocated on the following site: The Stables, Elvington: 3 plots b) Travelling Showpeople Yards within Employment Sites Travelling Showpeople yards will be permitted on existing and allocated employment sites provided development would not lead to the loss of land that that is necessary to meet both immediate and longer term requirements over the plan period in both quantative and qualitative terms and unacceptable environmental problems exist. b) Planning applications	To reflect updated evidence base.

Policy/Paragraph	Modification proposed	Reason
	In addition to the above allocated sites, development for Showman sites will be permitted where proposals: i. do not conflict with the objective of conserving and enhance York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function; ii. ensure accessibility to public transport and services; iii. are suitable in terms of vehicular access and road safety including internal space for adequate parking and turning; iv. ensure that development does not lead to unacceptable levels of congestion, pollution, and air quality for surrounding residents and future occupiers; and v. appropriately manage flood risk. In addition, proposals will be expected to: vi. provide adequate provision for storage, recreation space, amenity provision and utility services; vii. ensure that the size and density of pitches/plots are in accordance with best practice guidance; viii. incorporate appropriate landscape proposals to have a positive influence on the quality and amenity of the development; ix. ensure that residents living nearby are not unduly affected by noise, disturbance or overlooking; and x. ensure future occupiers would not be subject to significant adverse environmental impacts. Any permission granted for a Travelling Showpeople development will be subject to a condition limiting occupation to Travelling Showpeople, as appropriate.	
New paragraphs	Key evidence including the Equality and Human Rights Commission report Inequalities Experienced by Gypsy and Traveller Communities (2009) suggests that today Gypsies and	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	Travellers are the most marginalised and disadvantaged of all minority groups nationally, suffering the greatest inequalities across a range of indicators. Planning Policy for Traveller Sites (2015) introduced a revised definition for Travellers which states that households that do not travel for work purposes fall outside the planning definition of a Traveller. In light of the revised definition, the Council commissioned consultants to undertake an update of the Gypsy, Traveller, and Showpeople Accommodation Assessment (2013). As part of this update, Gypsy, Traveller and Showpeople households completed as revised survey which could be used to analyse their travel patterns and to conclude whether or not they fall into the revised definition of Travellers. Table 5.3 below is taken from the Gypsy, Travellers and Showpeople Accommodation Assessment Update (2017) and summarises the number of households in York which do/do not meet the definition. **Table 5.3**	

Households in York	GTAA[2]	SHMA[3]	Total
Households that meet the Planning definition (incl. 10% of unknown need)	3	0	3
Households that do not meet the Planning Definition (incl. 90% of unknown need)	0	44	44
Total	3	44	47

Showpeople households that meet the Planning definition	3	0	3

[2] GTAA – Gypsy and Traveller Accommodation Assessment
[3] SHMA – Strategic Housing Market Assessment

Policy/Paragraph	Modification proposed	Reason

Total	**3**	**0**	**3**

In accordance with Government guidance set out in the NPPF (2012) and Planning Policy for Traveller Sites (2015), the Council is required to identify a supply of specific, deliverable Gypsy, Traveller and Travelling Showpeople sites sufficient to provide five years' worth of sites against their locally set targets to meet accommodation needs of these groups who meet the revised definition in York.

It is recognised that Gypsies and Travellers and Travelling Showpeople have different needs and that the two different groups should not be located on the same areas of land. Gypsy and Traveller and Travelling Showpeople provision has its own specific terminology. Gypsy and Traveller provision is expressed in 'pitches' on sites whereas Travelling Showpeople provision is expressed as 'plots' on sites often called a 'yard'. Nationally, pitch/plot sizes range from 200 m2 to 500 m2. An upper measurement of 500 m2 has been used in the allocation of sites to allow final design to accommodate all of the requirements set out in design guidance, including landscaping, play space and access arrangements. Space has also been taken into account for equine grazing which is a much needed provision in York. Final pitch sizes will ultimately be a matter for detailed planning applications to determine.

Two plots for Travelling Showpeople has been identified for the first 5 years of the plan period at The Stables, Elvington, with a further 1 plot in the same yard for the future expansion of the existing family in year 2032. The nature of Travelling Showpeople's work, requires level hard standings and covered sheds for the maintenance and storage of large fairground rides. For this reason, applications for yards in existing and allocated employment sites will be supported where the provision will not compromise the employment land supply.

The suitability of the location of any further sites for Gypsies, Travellers or Travelling Showpeople which come forward during the plan period will be determined in accordance with criteria i - v of Policies H5 and H6. These consider the natural and historic

Policy/Paragraph	Modification proposed	Reason
	environment, access to public transport and services, road access and congestion, and flood risk. The development of the allocated sites and any further sites that come forward during the plan period will be determined in accordance with Policies H5 and H6 criteria vi – x. These consider the provision of storage and recreation space, amenity provision, size and density of pitches/plots, landscaping of the site, amenity of nearby residents and future occupiers of the site. A condition will be attached to any permission to ensure that the sites remain in use by Gypsies and Travellers or Travelling Showpeople, as appropriate and the number of pitches and plots are retained to ensure a supply to need demand.	
Policy H7: Student Housing	University of York and York St. John University must address the need for any additional student ~~accommodation~~ housing which arises because of their future expansion of student numbers. ~~Provision will be expected to be made on campus in the first instance and in accordance with this policy.~~ In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation. To meet any projected shortfall, provision by the University of York can be made on either campus. Provision by York St. John University is expected to be off campus but in locations convenient to the main campus. SH1: Land at Heworth Croft, as shown on the proposals map, is allocated for student housing for York St. John University students. Proposals for new student accommodation will be supported where: i. there is a proven need for student ~~accommodation~~ housing; and ii. it is in an appropriate location for education institutions and accessible by sustainable transport modes; and iii. the development would not be detrimental to the amenity of nearby residents and the design and access arrangements would have a minimal impact on the local area.	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	Conditions will be used to ensure the proper management of the accommodation in the interests of the amenity of adjacent properties and that any development remains occupied by students in perpetuity, unless and until an alternative use is approved by the Council.	
Para 5.34	Students form an important element of the community and the presence of a large student population contributes greatly to the social vibrancy of the city and to the local economy. The Council are committed to ensuring their needs are met and will continue to work with the city's higher education institutions in addressing, and better understanding, student housing needs. The Council encourages purpose-built student ~~accommodation~~ housing where there is a proven need and it is designed and managed in a way that attracts students to take it up. This can free up ~~accommodation~~ housing suitable for wider general housing needs, taking pressure of the private rented sector and increasing the overall housing stock. There should be no unacceptable impact on amenity for local residents. In the interests of the proper management of the student accommodation and to protect the amenity of adjacent residents, where permission is granted it will be subject to a planning condition requiring that prior to the accommodation being occupied a management plan shall be agreed in writing with the Council to demonstrate the control of the following: • information and advice to occupants; • any necessary garden landscaping maintenance; and • refuse and recycling facilities. A further condition will be attached to any permission to ensure that the accommodation remains occupied by students. Without such a condition it would be necessary to consider the scheme for affordable housing given that there may be the opportunity for non students to occupy the properties.	To add clarity.
New paragraph	Whilst it is recognised that counting students can be difficult and student numbers can vary depending on what source or definition is used, applicants should present a proven need for student housing by providing an assessment of:	To add clarity

Policy/Paragraph	Modification proposed	Reason
	• existing and likely future student numbers and numbers requiring accommodation taking into account the proportion of students who study from home • a review of the current level of provision, including the level of vacancies and the quality of accommodation • the likely future supply of accommodation based on extant planning permissions Only full time students should be included in the analysis. Part-time students should be excluded based on the assumption that they are already housed for the duration of their part-time studies.	
Para 5.38	These data sets will be collated to calculate the proportion of shared households as a percentage of all households. It is considered that these sources will provide the best approach to identifying the numbers and location of HMOs in an area. Although it is accepted that it may not be possible to identify all properties of this type. The data will be analysed to avoid double counting, for example, identifying where a property may be listed as a licensed HMO and have sui generis HMO planning consent. ~~Given that the information collated may be expected to change over the course of the calendar year as houses and households move in and out of the private rented sector it is considered appropriate to base the assessment on a single point in time. Accordingly, data will be updated annually, in May, to allow for a complete picture of Council Tax returns.~~ Given that there are multiple data sources the HMO database will be updated a number of times a year to reflect these data sources. Accordingly, data from the HMO licence register will be updated quarterly as and when the register is updated, planning permission and certificate of lawful use permissions will be updated monthly and Council Tax data will be updated annually, in May, to allow for a complete picture of Council Tax returns. Additional properties that become known to the Council will be added as and when they are confirmed to be HMOs. Updating the HMO database in this way will allow for best picture of existing HMOs to be known. City wide mapping will be made available online for information, however for data protection reasons street level information collated in assessing a planning application can not be made public.	To reflect changes in the HMO SPD anda data collection since the HMO review.
New Policy H8:	To help improve affordability across the housing market, the Council will	To reflect the

<table>
<tr><th>Policy/Paragraph</th><th>Modification proposed</th><th>Reason</th></tr>
<tr><td>Affordable Housing</td><td>
<u>support</u> <u>residential schemes for 2 or more dwellings which:</u>

<u>i. reflect the relative viability of development land types in York by providing affordable housing percentage levels for site thresholds as set out in Table XX below:</u>

<u>Table XX: Affordable Housing Site Thresholds</u>

<table>
<tr><th>Threshold</th><th>Target</th></tr>
<tr><td>Brownfield sites = > 15 dwellings</td><td>20%</td></tr>
<tr><td>Greenfield sites = > 15 dwellings</td><td>30%</td></tr>
<tr><td>Urban sites < 15 dwellings</td><td>0%</td></tr>
<tr><td>Rural sites 11-14 dwellings that have a maximum combined gross floorspace of more than 1,000sqm</td><td>Off site financial contribution = £33,208.40 per unit (20%)</td></tr>
<tr><td>Rural sites 5-10 dwellings that have a maximum combined gross floorspace of more than 1,000sqm</td><td>Off site financial contribution = £24,906.30 per unit (15%)</td></tr>
<tr><td>Rural sites 2-4 dwellings that have a maximum combined gross floorspace of more than 1,000sqm</td><td>Off site financial contribution = £16,604.20 per unit (10%)</td></tr>
</table>

<u>ii on sites of 10 homes and above on-site provision will be expected, unless off-site provision or a financial contribution of equivalent value can be robustly justified.</u>

<u>iii. on rural sites of 2–15 homes an off site financial contribution (OSFC) is required in accordance with the approved formula set out below:</u>

<u>Average York Property price – Average York Fixed RP Price x % Target = OSFC per dwelling</u>
</td><td>current interim targets used for Development Management purposes.</td></tr>
</table>

Policy/Paragraph	Modification proposed	Reason
	iv. make provision which reflects tenure split in terms of social renting and intermediate housing, as set out in the most up to date Strategic Housing Market Assessment (SHMA). The current SHMA (2016) illustrates a 80:20 ratio. v. fully integrate the affordable housing by pepper potting throughout the development with no more than two affordable dwellings placed next to each other. The size and type of homes should be a pro rata mix of the total homes provided on site, taking into account current assessments of local need where on-site provision is required. The affordable housing should be visually indistinguishable from the open market dwellings. A Vacant Building Credit will be applied to appropriate development where a vacant building is either converted or demolished and is necessary to incentivise the scheme. This credit will be equivalent to the gross floorspace of the building to be demolished or brought back into use. This credit does not apply when a building has been 'abandoned'. The affordable housing should remain affordable in perpetuity, through use of a planning condition or obligation or if these restrictions are lifted, for subsidy to be recycled for alternative affordable housing. On completion, the affordable housing must be transferred to a Registered Provider approved by the Council. Where a developer believes the criteria set out in this policy cannot be fully met, they have the opportunity through open book appraisal to demonstrate through open book appraisal to demonstrate to the Council's satisfaction that te development would not be viable	
New paragraphs	**Thresholds** National Planning Policy Framework requires Councils to set policies for meeting identified affordable housing need, and that those policies should be sufficiently flexible to take account of changing market conditions.	To reflect the current interim targets used for Development

Policy/Paragraph	Modification proposed	Reason
	Given the conclusions reached in the Affordable Housing Viability Study (AHVS), developments within York should be able to provide the target levels of affordable homes approved for Development Management purposes. Therefore no individual site assessment will be required where submissions achieve these targets and this is to be encouraged in order to reduce time on further analysis and negotiation. Where a developer believes because of development viability that a site cannot meet the requirements of the policy, the developer will be required to submit an open book appraisal to justify any reduction from the target, at their expense. If agreement cannot be reached on the appropriate level of affordable housing between the Council and the developer it will be referred to the Valuation Office Agency at the expense of the developer, to determine the viable level of affordable housing. If a reduction is proven the Council may firstly seek Homes and Communities Agency subsidy (or other public subsidy) to achieve the level and mix of affordable housing consistent with the policy. If such subsidy is not available the Council may seek to vary the tenure mix or types of units of the affordable component where appropriate to assist in meeting the delivery of affordable housing objectives of the Council before agreeing a reduction in the overall amount of affordable housing. **Types** Affordable housing in York includes social rented and intermediate housing provided to specified eligible households whose needs are not being met by the open housing market, and who cannot afford to enter that market. The definition specifically excludes low cost market housing. **Tenure/Mix** The City of York Council Strategic Housing Market Assessment (2016) recommends an 80% social and affordable rented and 20% intermediate split. A full range of property sizes and types are needed to satisfy the affordable housing needs of the City and providing small or poor quality accommodation will not be seen as	Management purposes.

Policy/Paragraph	Modification proposed	Reason
	satisfying the policy. In order to help build mixed and sustainable communities the affordable homes need to be pro-rata of the market homes, integrated within the site and indistinguishable from the market housing on site. The affordable homes need to be fully integrated within the development by pepper potting throughout with no more than two affordable dwellings placed next to each other. The exception to this is apartment blocks if they are to be transferred freehold to Registered Providers (RP). These affordable apartment homes should be provided in an apartment block rather than pepper potted throughout the development. The size and type of homes should be a pro rata mix of the total homes provided on site, taking into account current assessments of local need where on-site provision is required. The affordable housing should be visually indistinguishable from the open market dwellings. The Council will make public any updates to the evidence on housing mix and tenure split that is currently provided in the SHMA. Developers should consult the Council's web site prior to making any planning application to confirm the then current position on this matter. **Provision** In accordance with national guidance affordable housing provision for sites of 15 homes and above will normally be expected to be provided on site. Following the change to national Planning Guidance, the council can no longer seek financial contributions towards affordable housing on rural schemes of 1 to 10 units with a gross area of no more than 1,000sqm. Planning obligations on affordable housing and other matters can only be applied to schemes of 11 new homes or more or 1 to 10 new homes with a total gross floorspace of more than 1,000sqm. The commuted sum is calculated using the following formula and will be updated annually: Average York Property price – Average York Fixed RP Price x % Target = OSFC per dwelling	

Policy/Paragraph	Modification proposed	Reason

Table XX: Commuted payment calculation

Dwelling threshold	Average York property price (Land Registry August 2012)	Average York fixed RSL price	% target	Commuted payment
Rural sites 2 - 4 dwellings that have a maximum combined gross floorspace of more than 1,000sqm	£241,042	£75,000	10%	£16,604.20
Rural sites 5-10 dwellings that have a maximum combined gross floorspace of more than 1,000sqm	£241,042	£75,000	15%	£24,906.30
Rural sites 11 - 14 dwellings that have a maximum combined gross floorspace of more than 1,000sqm	£241,042	£75,000	20%	£33,208.40

Any other off site provision or commuted payment in lieu of on-site provision for affordable housing will only be acceptable if it is robustly justified. The commuted payment will be calculated as the difference between the transfer price and the market value of the specific home(s) on that site.

Policy/Paragraph	Modification proposed	Reason
	Artificial Subdivision Artificial subdivision where it is proposed to phase development, sub-divide sites or when there is a reasonable prospect of adjoining land being developed for residential purposes in tandem or the future, the Council, will consider the whole site for the purpose of determining whether the scheme falls above or below the thresholds **Vacant Building Credit** A Vacant Building Credit (VBC) will be applied to appropriate development where a vacant building is either converted or demolished and is necessary to incentivise the scheme. A viability appraisal in accordance with this policy is considered to be consistent with the underlying intention of the vacant building credit in order to incentivise brownfield development and, given the high need for affordable housing in York, may be the most appropriate option when weighing up all material considerations. If VBC is applied, this credit will be equivalent to the gross floorspace of the building to be demolished or brought back into use. This credit does not apply when a building has been 'abandoned. A Supplementary Planning Document (SPD) will be used to set out clear and consistent guidance on all elements covered by Policy H9 and Policy GB4, including the mechanism for updating the OSFC annually.	
New Policy H9: Older Persons Specialist Housing	The City of York Council and its partners will work together to enable the delivery of specialist (supported) housing and registered care housing for vulnerable people including for the ageing population, such as extra- care accommodation, Developments specifically designed to meet the accommodation needs of older people will be supported where they: i. contribute to meeting an identified need; ii. are well designed to meet the particular requirements of residents with social, physical, mental and/or health care needs; and iii. are in an accessible location by public transport or within walking distance to a range of community facilities including shops, medical services and public open spaces or	To reflect the housing white paper.

Policy/Paragraph	Modification proposed	Reason
	these are provided on-site. Strategic sites (over 5ha) should incorporate the appropriate provision of accommodation types for older persons within their site masterplanning. For sheltered/extra care accommodations a mix of tenures will be supported. Where development falls within Use Class C3 affordable housing will be required in accordance with Policy H10 (Affordable Housing)	
New paragraphs	**Explanation** The council is committed to meeting the specific housing needs of the aging population and people with disabilities or additional mobility requirements. The City of York has a population that is older than the national average, with a high proportion of people aged 85 or over. As people live longer this trend is predicted to continue with significant growth in the city's population aged over 65, The health of this section of the population is also expected to decline with a significant increase in the number of people with dementia or mobility problems. This is likely to present some challenges. Ensuring appropriate accommodation in suitable locations is available to meet everyone's needs, including enabling older people to remain in their homes longer, is a key issue to be addressed. The specific housing needs and aspirations of older people and the ability for them to exercise choice and control over meeting these needs will vary. In order to ensure provision for such needs a wide range of housing types and tenures will be required (through policy H3: Balancing the housing market). Whilst the majority of older people will live in mainstream housing there will be a need for new specialist accommodation provision such as sheltered housing and extra care provision. The 2016 SHMA analysis identifies that over the 2012- 2033 period there is an identified need for 84 specialist units of accommodation for older people (generally considered to be sheltered or extra-care housing) per annum. Such provision would normally be within a C3 use class and is part of the objective assessment of housing need. In addition, the SHMA highlights a potential need for an additional 37 bedspaces per annum for older people	To reflect the housing white paper.

Policy/Paragraph	Modification proposed	Reason
	(aged 75 and over) in the 2012- 2033 period for nursing and residential care homes. This accommodation is within use class C2 (communal facilities) and is in addition to the objective assessment of housing need. The amount and type of specialist accommodation required will depend on a range of factors including individual choice. The council will consult with health and social care services on larger planning applications and/or those that could have service provision implications. Where specialist accommodation is provided, it will be important to ensure that it enables residents to live independently as far as possible by ensuring it is located close to facilities and services or that they are accessible by public transport. Strategic sites (of over 5ha) should incorporate a wider range of accommodation suitable for older people.	
Section 6: Community Facilities		
Section 6: Community Facilities	Renamed as Public Health and previous policies CF1: Community Facilities, CF2: Built Sports Facilities, CF3: Childcare Provision and CF4: Healthcare and Emergency Services replaced by the following policies and explanatory text.	To have a greater focus on health and wellbeing and to reflect the 'building happy, healthy and resilient communities' priority in the new Council Plan.
New Paragraphs	It is the Council's ambition for all residents to have the best possible physical and mental health throughout the course of their lives. Health and wellbeing are affected by a wide range of things, including access to good healthcare and leisure facilities, and behavioural choices related to diet and exercise. The built environment influences these choices and may be harnessed to enhance people's lives and to promote positive behavioural change. This affords the planning system significant opportunity to make enduring changes to the health outcomes and wellbeing of residents — changes which will last as long as the buildings and public spaces themselves.	See above

Policy/Paragraph	Modification proposed	Reason
	The majority of people in York report good health and wellbeing, and these figures are higher than the regional and national averages. Despite this, a significant proportion of adults and children in York are overweight (58.4 and 30.6%, respectively) and around 40% of the adult population report that they are not physically active. These figures are predicted to get worse without intervention, placing increased demands on already-stretched health and social care providers. Furthermore, there are certain areas of the city where health outcomes and wellbeing are markedly poorer, typically in the most deprived areas. This section sets out policies intended to help residents lead healthier and happier lives, with particular emphasis placed on the strategic priorities for the city, as set out in York's Joint Health and Wellbeing Strategy (2017-22). The policies contained within this section cover the protection and expansion of emergency services, healthcare, community, sport, and childcare facilities, as well as the promotion of community cohesion and physical activity through good design. This section should be considered in conjunction with policies related to the protection and provision of open spaces (GI5/GI6), access to nature (GI2), travel by sustainable and active transport (T1), and air and noise pollution (ENV2)—all of which have an impact on the health and wellbeing of residents.	
New policy	**Policy HW1: Protecting existing facilities** The Council will work with local communities and voluntary sector organisations to help preserve and re-use existing community assets. Development proposals which involve the loss of existing community facilities, or facilities last used for community purposes, will not be supported, unless it can be demonstrated that: i. facilities of equivalent or greater capacity and quality (in terms of function, accessibility, adaptability and variety of use) are provided elsewhere on the site; or	See above.

Policy/Paragraph	Modification proposed	Reason
	ii. facilities of equivalent or greater capacity and quality (as defined above) are provided off-site, in a location that equivalently or better serves the local community's needs; or iii. the facilities no longer serve a community function and demonstrably cannot be adapted to meet other community needs; or iv. in the case of commercial facilities, evidence is provided that demonstrates the facilities are no longer financially viable. Developers must consult with the local community about the value of the asset and the impact that a loss of facilities may have. If facilities are to be provided elsewhere, a clear commitment to replace them in a timely manner must be evidenced, in order for planning permission to be granted. **Explanation** For the purpose of the policies within this section, community facilities should be taken to mean the buildings, facilities, and services that meet the day-to-day-needs of communities. This may include libraries, post offices, and community meeting places, such as youth groups, places of worship, and parish and village halls. Since this is not an exhaustive list, proposals will be considered on an individual basis, with weight placed on the significance of the amenity to the local community or relevant subgroup of the community. Sports, medical, childcare and cultural facilities are excluded from this since they are covered by policies HW3, HW4, HW5, and D3, respectively. The Council will work with local communities and voluntary sector organisations to help preserve and re-use community assets. Community facilities provide opportunities for recreation and for people to come together — two important contributors to individuals' mental health and wellbeing. Community facilities are also an essential part of enabling residents to meet their practical everyday needs. The NPPF supports the protection of community facilities, acknowledging their importance for the creation of inclusive and sustainable neighbourhoods.	

Policy/Paragraph	Modification proposed	Reason
	A loss of local facilities that residents depend upon has the potential to erode community cohesion and exacerbate social isolation. Although a loss of facilities would affect all residents, groups likely to be particularly affected by loss of amenities include the elderly, those with reduced mobility, and those on low income, all of whom may struggle to travel to use alternative facilities. Chronic loneliness is a key concern highlighted by to older population of York (York's Joint Health and Wellbeing Strategy 2017-22). A loss of viable community facilities will only be permitted if they are replaced by facilities of equal or greater capacity and quality and met by developer contributions. Applications which involve the disposal of community assets must therefore include an assessment of the current function, accessibility, and adaptability of the facility. Applications must demonstrate how alternative facilities will meet or exceed these standards. As part of this process, it is expected that developers will consult with the local community to understand their needs. The approach o consultation should be agreed with the Council. Any replacement facilities must also meet conditions for new facilities set out in Policy HW2, and should be replaced in a timely manner, so as to minimise the impact on communities in terms of meeting their daily needs and their enjoyment of community facilities. The Local Plan has an important role to play in ensuring that community facilities are provided in the most effective and accessible way. Existing services must be protected as much as possible, however, it is also important to ensure that existing facilities are 'fit for purpose'. Changes in the economic climate may mean that some facilities are no longer financially viable. Only in such circumstances, and when no alternative community use is possible, a loss of facilities will be permitted. Evidence that the facilities have been marketed for a minimum of a year without success will be required to demonstrate they are unviable.	
New Policy	**Policy HW2: New Community Facilities** Applications for residential developments of 10 dwellings or more must be accompanied by an audit of existing community facilities and their current capacity. Developments that place additional demands on existing services will be required to provide proportionate	See above.

Policy/Paragraph	Modification proposed	Reason
	new or expanded community facilities, to meet the needs of future occupiers. Developer contributions will be sought to provide these additional facilities. As the population grows and population demographics change over the plan period, new facilities will be required. The Council will work with communities and other partners to help address deficits in community facilities. The Council will support applications for new community facilities when an existing deficit or future need has been identified. Where appropriate, facilities should be designed to be adaptable and multi-purpose, in order to future-proof services and enable a wide range of community uses. Any new or expanded facilities must be accessible and well-served by public transport, footpaths and cycle routes. **Explanation** The NPPF encourages Local Authorities to proactively support the development of accessible community facilities that meet the needs of existing and future residents. The Council seeks to address deficits in community facilities and support the development of high-quality, accessible facilities. The aspiration is that, regardless of age, health or mobility, everyone should have access to the social and recreational benefits that community facilities provide. The Council will support the development of new community facilities where there is an identified community need and the capacity to manage them. Such an assessment should be based on community consultation. Where appropriate, new facilities should be designed to be adaptable and multi-purpose, in order to future-proof services and enable a wide range of community uses. Facilities with a specific purpose will also be supported, when the development proposal is community-driven. The Council will support communities to bring about development through Community Right to Build Orders, in line with NPPF guidance.	

Policy/Paragraph	Modification proposed	Reason
	New residential development must be accompanied by new or expanded community facilities, when existing facilities will not meet the needs of future occupiers. Such an assessment should be based on an audit of existing facilities. All strategic sites must include an assessment of the need for additional facilities and plan for their provision in their master planning. Any new community facility developments must be easily accessed on foot and by bike, as well as by public transport. This should be in line with Policy T1 'Sustainable Access'. While the proximity of community facilities has benefits for all residents, reduced travel time for essential services is particularly important for those who are less mobile, and those on low incomes who are less able to travel long distances. Services that are well-served by footpaths and cycle routes have additional physical and mental health benefits owing to the promotion of time spent outdoors, increased physical activity, and reduced vehicle emissions. Reducing the pressures on statutory services — by supporting people to better manage their own health and wellbeing — is a key national and local priority. This is contingent upon individuals having access to the necessary facilities and support networks to meet their needs. Community-based solutions to health and wellbeing, such as joining clubs, attending peer-support groups or volunteering, are now acknowledged as effective and necessary alternatives to traditional health and social care interventions. The NPPF encourages an integrated approach to development, and therefore multi-amenity developments will be favoured and promoted where possible. Such developments carry the benefits of reducing travel costs, creating community hubs, and making it easier for those with limited mobility to carry out their day-to-day activities. Enabling the elderly, long-term ill, and those with disabilities to continue to be independent and live in their communities is a key council priority. Networks of good quality community facilities are vital to the creation of resilient communities.	
New Policy	**Policy HW3 Built Sport Facilities**	See above.

Policy/Paragraph	Modification proposed	Reason
	The Council will support development that enables residents to enjoy and make use of built sports facilities. Developments that place additional demands on existing built sport facilities will be required to provide proportionate new or expanded facilities, to meet the needs of future occupiers. Developer contributions will be sought to provide these additional facilities. Enhanced facilities should be provided on-site, where possible. If off-site provision is necessary, facilities should still be accessible to residents within the areas of deficiency; be well served by public transport; and be easy to reach on foot and by bike. The loss of built sports facilities (either currently or last used for sports activities) will only be permitted in exceptional circumstances where: • a needs assessment provided by developers, and in accordance with the most recent Built Sports Facilities Strategy, identifies an over-provision in the area; or • the development only affects part of the site and does not impact on its value for sport; or • it would be replaced by a facility of equivalent or better quality and capacity, in a location that still serves the same community that is accessible by public transport, foot and bicycle and that has adequate management arrangements. Development for new or expanded built sports facilities will be supported where a deficiency in current provision has been identified, and when they are well located, accessible to all, and when suitable infrastructure exists or can be created to manage and maintain the facility. Development of new sports facilities should be co-located with other health and community facilities and schools, where possible, to encourage participation in exercise. Any future demand should, in the first instance, be met through extensions and expansion of existing high-quality sustainable sites. **Explanation**	

Policy/Paragraph	Modification proposed	Reason
	Accessible built sports facilities are an integral part of encouraging people to be more physically active, tackling obesity, and improving the physical and mental health of communities. Local Planning Authorities play a key part in meeting these aims, by ensuring that the necessary facilities are close by, accessible to all, and able to meet demand. Built sports facilities include swimming pools, tennis courts, artificial grass pitches for football and hockey, sports halls, indoor and outdoor bowls, multi-use games areas alongside more specialist outdoor provision such as athletics tracks, golf courses and cycle tracks. New development must not compromise current or future residents' health and wellbeing and the Council will work to safeguard existing sports facilities. York's built sports facilities will be protected unless it can be demonstrated that the use is no longer viable, is surplus to need, or that high-quality alternative provision can be made that maintains a service in the existing area of benefit. Need should be identified through consultation of the city's most up-to-date Built Sport Strategy. Developer contributions will be expected to support the development of new facilities, should new residential developments place additional demands on services above their current capacity. The Council will support the development of new facilities where there is an identified need. Judgments on the need for new facilities will be based on the most-up-to-date Built Sports Strategy and other key evidence. Regular physical activity significantly reduces the risk of developing chronic health conditions, including stroke, cancer and type II diabetes. These health benefits are realised even through a modest increase in activity levels. While a high proportion of York's residents participate in sport relative to the national average (61.5% vs. 56%), this still leaves a significant proportion who are inactive. The importance of Local Planning Authority intervention in the promotion of physical activity is further emphasised by Sport England's estimate that preventable health conditions associated with inactivity cost	

Policy/Paragraph	Modification proposed	Reason
	healthcare providers in York in excess of £3 million per annum. In addition to the physical health benefits, participation in exercise is associated with improved mental health, and in particular, a reduced likelihood of developing depression and anxiety. The aspiration to be a mental health friendly city is a priority set out in York's Joint Health and Wellbeing Strategy (2017-22). Addressing health inequalities is a key council priority and this strongly depends upon ensuring that all communities have adequate access to sports facilities. It is essential that any new sports facilities are well served by public transport, and can be reached easily on foot and by bike. This should be in line with Policy T1 'Sustainable Access'. Proximity of sports facilities is a major determinant of whether individuals participate in exercise . The Council will work proactively to ensure that high-quality facilities are delivered, since the quality as well as the availability of facilities has been found to correlate with participation in physical activity. Permission was granted in May 2012 for the York Community Stadium at Monks Cross. Detailed planning consent was approved in 2015 and an S73 application was approved in 2016 for some minor amendments. Construction is expected to be complete by the end of 2018. The stadium will provide a new home for both of York's professional sports teams, York City Football Club and York City Knights RLFC. The new development will provide new leisure facilities including a new swimming pool, outdoor 3G pitches and climbing facilities. A new gym, dance studio and fitness centre will help with the rehabilitation of NHS patients, and will also be available for wider community use. A new community hub will include an Explore Learning Centre; outpatient facilities for the York Teaching Hospital NHS Foundation Trust; the York NHS Training and Development Centre; and a new York Against Cancer Centre. The development will also provide a number of commercial facilities, including a state-of-the-art thirteen screen Imax cinema, two large retail units and five restaurants.	
New Policy	**Policy HW4: Childcare Provision**	See above.

Policy/Paragraph	Modification proposed	Reason
	The Council will support development that helps meet the city's need for childcare provision. All strategic sites will be expected to conduct an audit of existing childcare facilities and their current capacity. If increased demand from new residents would be expected to exceed the existing capacity of facilities in the vicinity, additional facilities must be incorporated into the masterplanning of the site and supported by developer contributions. Proposals which fail to protect existing childcare facilities will be refused unless it can be demonstrated that the provision is no longer required, no longer viable, or if equivalent replacement facilities can be provided elsewhere. Applications for new childcare provision should be accompanied by an assessment that demonstrates the need for additional childcare provision in the locality. The Council will work with schools, parents and carers to ensure that their needs are understood. Any proposed new or replacement childcare facilities should be sited in accessible locations within or near to the areas of identified need — they should be well-served by public transport, and be easily accessible by walking and by bike. This should be in line with Policy T1 'Sustainable Access'. **Explanation** As reflected in York's Joint Health and Wellbeing Strategy, it is a Council priority to ensure that children are happy, healthy, and get the best start in life. The provision of good quality childcare is essential for early childhood development, and has significant implications for economic wellbeing, since childcare gives parents or carers the opportunity to pursue education, training, or employment. There are a number of different types of childcare provision, including childminders, day nurseries, playgroups, crèches, holiday schemes, and out-of-school clubs.	

Policy/Paragraph	Modification proposed	Reason
	The demand for childcare is dynamic and dramatic changes can take place over a short period of time. In September 2010, all three- and four-year-olds became entitled to 15 hours per week of free early education, and in 2013, the Government introduced additional childcare entitlement for two-year-olds meeting certain criteria. A further increase in childcare entitlement for three- and four-year-olds with working parents is expected from September 2017. This is likely to create even greater demand for childcare provision in the city. The Council has a statutory duty to ensure adequate childcare provision is available. The loss of existing childcare facilities will be strongly resisted unless it can be demonstrated that the provision is surplus to demand, no longer financially viable, or that equivalent alternative provision can be made. To help ensure that childcare in York matches the needs of local families and that any gaps in provision are met, applications for new childcare facilities will be supported when they are in accessible locations, and are accompanied by a needs assessment demonstrating a need for provision in the locality. The noise and traffic impacts arising from any childcare provision proposals, particularly for residential communities, should be taken into account in line with Policy ENV2 'Managing Environmental Nuisance'.	
New Policy	**Policy HW5: Healthcare Services** **Primary care** The Council will work closely with GPs and the NHS Vale of York CCG (or any successor organisation) to understand the current and projected needs of communities for primary care. The Council will support the provision of new or enhanced primary care services when there is an identified need. Improved, enlarged or additional primary healthcare facilities will be required to support	See above

Policy/Paragraph	Modification proposed	Reason
	residential developments that place additional demands on services beyond their current capacity, in line with NPPF guidance. Developer contributions will be required to support the increase in provision. An assessment of the accessibility and capacity of existing primary care services will be required at the pre-application stage. Proposals which fail to protect existing primary care services, or involve the loss of services, will not be supported, unless it can be demonstrated the facilities are no longer required or that relocating facilities would better meet the community's needs. Any new primary care facilities must be easily accessible by public transport, walking, and cycling. **Secondary care** The Council will work closely with the York Teaching Hospital NHS Foundation Trust, and with Tees, Esk and Wear Valley NHS Foundation Trust (or any successor organisations), to understand their needs; help ensure their sites are fit for purpose; and enable them to provide safe, effective and sustainable healthcare, for the plan period and beyond. **York Teaching Hospital NHS Foundation Trust** The Council will support the redevelopment of York Teaching Hospital NHS Foundation Trust (as identified on the Proposals Map) to enable it to expand its capacity; to uphold and improve the quality of secondary care it delivers; and ultimately to remain on its existing site for the long term, ensuring the optimum delivery of secondary care services in York. The Council will support the redevelopment of the staff car park on the existing York Teaching Hospital NHS Foundation Trust site, in order to expand existing clinical facilities. The Council will work with York Teaching Hospital NHS Foundation to develop a new Travel Plan, to ensure that the loss of car parking facilities will not compromise access or care.	

Policy/Paragraph	Modification proposed	Reason
	To enable the Trust to meet its immediate need for increased capacity in Accident and Emergency, the Council will support the development of the extension to York NHS Hospital Trust site (as marked on the Proposals Map), for health and social care purposes, such as a GP practice or short-term residential care. The Council will continue to work with the Trust to help them make additional changes to their site as their needs change over the plan period. **Tees, Esk and Wear Valley NHS Foundation Trust** The Council will support Tees, Esk and Wear Valley NHS Trust in the relocation of services previously provided at Bootham Hospital to a new site on Haxby Road, in order to provide the best patient care. Future consideration of the Bootham Park Hospital site must follow a full appraisal of the significance of the historic buildings, landscape and archaeology on site. Any redevelopment proposals must arise out of this understanding, in order to enhance or better reveal their significance into the long term. **Explanation** The NPPF requires local planning authorities to understand and facilitate local strategic healthcare priorities. Primary care is typically the first point of contact with health professionals—it is generalist, rather than specialist, in its nature—and covers GPs, pharmacists, opticians and dentists. Secondary care refers to specialist health care, which typically depends on a referral from a primary care provider. Healthcare facilities are important for both the treatment of illness and for educational purposes, in relation to physical activity, diet, alcohol and smoking. Healthcare services must be responsive to the current and projected needs of local communities. This is contingent upon having appropriately located sites, which are able to cope with local demand and provide a sustainable and effective service. The Council will help protect existing healthcare facilities and support the relevant bodies to expand their	

Policy/Paragraph	Modification proposed	Reason
	premises, or seek alternative, more suitable sites, where appropriate. Any new medical facilities should be easily accessible by foot, bike and public transport, in line with Policy T1 'Sustainable Access'. Co-location of new health facilities with other community and sports facilities will be encouraged. The development of new primary and secondary care facilities should be guided by the design considerations set out in Health Building Note 11: Facilities for Primary and Community Care Services produced by the Department of Health. It is important that York retains its role as a major secondary healthcare provider for the wider sub area. As such the Council will support the York Teaching Hospital NHS Trust to make the best use of their site, ensuring that they are able to meet both their strategic and clinical objectives. The Council will also support Tees, Esk and Wear Valley NHS Trust in their relocation, in order to provide the best patient care. The population of York is expected to change significantly over the course of the Local Plan, with a significant increase in the older adult population and corresponding increase in the number of individuals with long-term health conditions. New developments will also give rise to localised changes in demographics. Additional or adapted healthcare services may be required to respond to changing needs over the plan period. This will require working collaboratively with healthcare providers and their communities. Any new healthcare facilities that are required as a result of additional residential development must be supported through developer contributions.	
New Policy	**Policy HW7: Healthy places** Proposals for residential developments must provide a statement—proportionate to the size of the development—showing how the following design principles have been adequately considered and incorporated into plans for development: • well-designed streetscapes that encourage residents to spend time outdoors; and • the provision of safe, easy to navigate and attractive public footpaths and cycle paths	See above.

Policy/Paragraph	Modification proposed	Reason
	between dwellings, to encourage physical activity; and • good connections to neighbouring communities and green spaces, in the form of footpaths and cycle routes, including the extension and protection of public rights of way, where appropriate ; and • spaces for communities to come together; and • adaptations to buildings and public spaces for those with limited mobility; and • considerations for how the design may impact on crime or perception of safety; and • buildings that are adaptable to the changing needs of residents. Details of how these principles have been considered should be noted in the Design and Access Statement accompanying the proposal. All strategic sites must complete a Health Impact Assessment (HIA) prior to the submission of a planning application. HIAs are a means to systematically assess the potential health risks and benefits of new developments on existing and future communities — they promote the development of actions to mitigate negative impacts and maximise community benefit. **Explanation** The NPPF strongly supports planning conditions that promote well-designed developments which support healthy lifestyles. Through good urban design, the built environment can promote more active lifestyles and time spent outdoors. Helping people to be more active and walk more is a key priority for the city, and an integral part of tackling obesity and improving mental health (Joint Health and Wellbeing Strategy). The Council will support development that demonstrates how consideration has been given to the layout and presentation of buildings and the public realm, towards these ends. Such considerations should be proportionate to the size of the development and reported in a Design and Access Statement. The design principles within Policy HW7 build on those set out in Policy D1, but place greater emphasis on the implications of good design for	

Policy/Paragraph	Modification proposed	Reason
	mental and physical health. The Council will support developments that are pedestrian- and cycle-friendly and well-connected to neighbouring areas, local amenities and parks and open spaces. Busy lifestyles often mean that people have little time to dedicate to physical activity, unless it can be integrated into their routine as a means of getting around. Developments that improve access to open spaces through the protection and extension of public rights of way will be supported, where appropriate. NPPF acknowledges the important role the planning system plays in facilitating social interaction and creating healthy, inclusive communities. The Council will encourage development that provides spaces where communities can come together, reducing social isolation. Development should be inclusive and meet the needs of all residents, young and old, irrespective of mobility. Strong community networks also have implications for crime, and good design can be utilised to create developments that reduce crime and/or residents' fear of crime. With a growing and ageing population with more long-term health conditions designing healthy places is an essential part of coping with the increased demand placed on health and social care and future proofing our communities. Policy HW6 provides the opportunity to embed preventative health measures into the fabric of our communities —through the promotion of physical activity—with the potential to make enduring changes to residents' health and wellbeing. Health Impact Assessments (HIAs) are a crucial tool for identifying the positive and negative health impacts of new developments and the necessary remedial actions to minimise negative and maximise positive benefits. This information should be incorporated into site masterplanning. HIAs help identify particular subgroups of the population that are likely to be affected by the development. This is a key to ensuring that health inequalities are not exacerbated. The Council will develop Supplementary Planning Guidance on the development and completion of HIAs and work with developers to produce this	

Policy/Paragraph	Modification proposed	Reason
	documentation.	
Section 7: Education		
Policy ED1: University of York Campuses	**Policy ED1: University of York ~~Campuses~~** To ensure the continuing development of the University of York, the following range of higher education and related uses will be permitted on the University's campuses, as identified on the Proposals Map: • academic, teaching, research and continuing professional development uses ~~facilities~~; • ~~residential accommodation~~ housing for staff and students; • arts, cultural, sports and social facilities ancillary to higher education uses; • conferences; • knowledge based ~~activities~~ businesses including research led science park uses ~~which need to be located on the campuses due to sharing of research work, personnel or other university related functions~~; and • any other uses which ~~are considered to be~~ ancillary to the university including support services for the uses identified above The University of York must address the need for any additional student ~~accommodation~~ housing which arises because of ~~their~~ it's future expansion of student numbers. Provision will be expected to be made on campus in the first instance ~~and in accordance with Policy H7: Student Housing~~. In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation.	To add clarity.
Para 7.2	To ensure that the existing campuses forming the University ~~of York~~ make a full contribution to the life of the city, it is important that they continue to be used for predominantly higher educational and related uses. It is also vital that opportunities are maintained for the University's cultural, social and sports facilities to be used by the wider public.	To add clarity.
Para 7.3	~~Knowledge based activities, including Science City York uses, must demonstrate that they~~	To use the most

Policy/Paragraph	Modification proposed	Reason
	~~need to be located on the site due to aspects such as sharing of research and development ideas, resources or personnel, or undertaking of research activities within the University of York~~. ~~Science City York uses that will be acceptable on the campus are defined as being those:~~ • ~~which operate within a high technology sector and/or engage in innovative activities; and~~ • ~~which have a focus on research and development, product or process design, applications engineering, high level technical support or consultancy; and where a minimum of 15% of the staff employed are qualified scientists or engineers (qualified scientists or engineers are those qualified to at least graduate level in physical, biological, social sciences or humanities disciplines related to the work of Science City York).~~ Campus East provides the potential for a cluster of knowledge based companies to locate, to the benefit of city and University. Such uses will contribute to the implementation of the Council's Economic Strategy (2016) and to the vitality of the University's research activities.	relevant terminology.
Policy ED2: Heslington West Campus	**Policy ED2: ~~Heslington~~ Campus West ~~Campus~~** To maintain the character of ~~the University of York Heslington~~ Campus West ~~campus~~, proposals for extension and redevelopment of existing buildings and the construction of new buildings will be allowed within the following parameters: • the developed footprint (buildings and car parking only) shall not exceed 23~~0~~% of the total site area, unless for an agreed temporary period during the implementation of proposals; • the heights of buildings shall be appropriate to their surroundings and not exceed the height of any adjacent mature tree canopies unless a greater height can be justified in relation to a proposed iconic or landmark building; • the landscape is conserved and enhanced;	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	• general car parking (excluding accessible parking spaces) shall not exceed 1,520 spaces ~~and managed in accordance with the agreed parking strategy - check permission~~; • maintenance ~~the provision~~ of an adequate internal cycle and pedestrian ~~non car based transport~~ network which links to entrance points and bus stops; and • the level of student housing capacity is retained at no less than 3,586 bed spaces unless the spaces are re-provided on Campus East.	
Para 7.4	~~The University of York Heslington~~ Campus West ~~campus~~ is shown overleaf at Figure 7.1. To ensure that university buildings on ~~Heslington~~ Campus West meet the requirements of a modern higher education institution, the replacement of buildings that are no longer fit for purpose and life expired will be supported. Proposals for extension or redevelopment should be in accordance with the provisions of the emerging University of York Development Brief, ~~University of York Heslington Campus Development Brief for Future Expansion (1999),~~ the principles of which are set out in Policy ED2 above. For information on the uses permitted at Campus ~~Heslington~~ West please see Policy ED1.	To add clarity.
Para 7.5	In accordance with the Section 106 legal agreement for ~~Heslington~~ Campus East, the level of student housing capacity at ~~Heslington~~ Campus West must be retained at least at the level at 2006, ~~as~~ at the date of the agreement. ~~Student housing capacity at Heslington West has been~~ This was established at 3,586 bedspaces.	To add clarity.
	Policy ED4: York St. John University Lord Mayor's Walk Campus The development and redevelopment of York St John University's Lord Mayor's Walk campus will be permitted provided that it is limited to higher education and related uses and its design takes into account the sensitive location of the campus and its setting. York St. John University must address the need for any additional student ~~accommodation~~ housing which arises because of their future expansion of student numbers. In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation. To meet any projected shortfall, provision will be expected to be ~~made on~~ off campus but in locations convenient to the main campus ~~and at SH1: Land~~	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	~~at Heworth Croft in the first instance and in accordance with Policy H7: Student Housing~~. The reduction of on-campus student provision will be supported subject to adequate provision being made off campus.	
Para 7.12	Ongoing renewal and redevelopment of York St. John University existing campus to meet education needs will be supported. This includes providing high quality buildings, providing safe, accessible facilities, enhancing the environmental quality of the estate and ensuring optimal use of the campus. Given the ~~seven~~ six Grade II listed buildings within the campus and the conservation area context it is important that proposals take account of the sensitive location and its setting. Figure 7.2 below shows the location of the campus. For more information on the plan's approach to development which affects listed buildings and their setting please see Section 8 'Placemaking and Design'. The University is not expected to retain the existing small number of bed spaces on campus subject to adequate provision being made off campus for the accommodation to be decommissioned.	To add clarity.
Policy ED5: York St. John University Further Expansion	**Policy ED5: York St. John University Further Expansion** To support the continued success of York St. John University the following sites, as shown on the proposals map, are allocated for the uses below: **Sport uses:** • ~~Land at Mille Crux/Former Bio-Rad Site, Haxby Road; and~~ • Land at Northfield, Haxby Road. **Student Housing:** • SH1: Land at Heworth Croft.	To reflect that Mille Crux has already been developed and that the Former Bio Rad Site is no longer proposed to be allocate for this use.
Para 7.13	~~Land at Mille Crux, Haxby Road has a long history of sports related use including athletics, cricket, rugby and outdoor bowls. For many years the 13.1ha site, together with the adjacent 9.7ha Northfields sports fields, was owned and managed by Rowntree and then Nestlé predominantly for the use of company employees with some access by local community sports teams. In between Mille Crux and Northfields is a 2.1ha site which was occupied by the former Bio-Rad Factory, which was demolished several years ago. The sites are allocated to support York St. John University in their development of a multi-~~	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	~~million pound centre for sporting excellence via major financial investment in buildings and facilities.~~ Northfield is laid out with grass rugby and football pitches, with players using changing facilities at Mille Crux. Northfield is allocated for sports uses in support of the University's development of its multi-million pound centre for sporting excellence via its major construction of buildings and facilities.	
Para 7.14	The allocation of the site~~s~~ reflects York St. John University's ambitions and supports ~~the~~ it's major investment in the Sports Park ~~proposed by the university~~. It will assist in further extension ~~the university in fulfilling~~ ~~major aim~~ of its strategy for sport that supports the teaching of a range of sports degrees but also for the general fitness and enjoyment of students and community teams who use the site. ~~, to the improvement of indoor and outdoor sports facilities that support the university's size and ambitions, and enable it to accommodate community teams to provide more opportunities for sport benefitting students and York residents~~.	To provide an update.
Section 8: Placemaking and Design		
Section 8: Placemaking and Design	**Section 8: Placemaking, ~~and~~ Design and Culture**	To strengthen culture in the Local Plan.
New paragraph	Good place-making is the key driver of this Plan. A Local Plan is a spatial planning policy, but spatial planning and the overall planning and making of 'place' are inseparable. Successful placemaking is a creative, practical, and continual process. It is underpinned by a holistic approach to community wellbeing that embraces health, economy, culture, and the environment. It requires leadership combined with clear and widely-owned policy and practice developed in partnership between a local authority and all of its stakeholders.It is typified by strong and ongoing community engagement, as well as professional involvement, in the planning, design and management of new and regenerated places. York is a unique place with special character. History has created one part of this character, and the city's historic built and historic environment is of outstanding quality. The other part of York's specialness is its expression of contemporary culture and its aspiration. Our vision is for a city dedicated to innovation melded seamlessly with its heritage and expressed through a future-oriented culture of creativity, entrepreneurship, and learning.	To add clarity and to strengthen culture in the Local Plan.

Policy/Paragraph	Modification proposed	Reason
Para 8.1	~~York's historic built and historic environment is of outstanding quality.~~ This integration of past and future, of tradition and innovation ~~intrinsic value~~ has been central to York's economic success in the past and will continue to be so in the future. York's special characteristics are key benchmarks when considering the quality of future development and the contribution it will make to the city's social, economic, environmental ~~future historic legacy~~ and cultural wellbeing. Development proposals should be of high design standards at all scales- from masterplanning to individual building and open space design. To complement this legacy these developments should not attempt to ape the past but instead should simply be based on good design. Good design should be fit for purpose, sustainable, efficient, coherent, flexible, responsive to context, attractive and a clear expression of the requirement of a particular brief. It should seek to add to the city's overall cultural quality as a place, and also enhance its cultural capacity --- its ability to create opportunities for cultural creation, expression, learning, sharing, and enjoyment. Good design can be demonstrated through engagement in peer-review design panels and meaningful public engagement and this will be encouraged and supported.	To add clarity and to strengthen culture in the Local Plan.
Para 8.2	~~The Council has a clear understanding of what makes the city and its surrounding villages and countryside special, and what factors contribute to character and significance.~~ Good placemaking and design and the culture identity that arises from them starts with a clear understanding of what makes the city and its surrounding villages. There are a number of existing studies that will assist the process of analysing character and significance, and they should always be used to guide development proposals. These include Conservation Area Character Appraisals and Statements, the City of York Streetscape Strategy and Guidance (2014), the 2014 review of the 'York Development and Archaeology Study', the York Heritage Topic Paper the Historic Environment Characterisation Project, York New City Beautiful (2010). Reference should also be made to the background studies referred to in Section 9: Green Infrastructure and Section 10: Approach to Managing Appropriate Development in the Green Belt and, where relevant, Village Design Statements and Neighbourhood Plans. A Cultural Strategy for York is also currently in development.	To add clarity and to strengthen culture in the Local Plan.
Para 8.4	In meeting the policy requirements of this section, applicants will be required to describe the significance of heritage assets likely to be affected by development, including any	To strengthen culture in the

Policy/Paragraph	Modification proposed	Reason
	contribution made by their setting, most likely set out in a supporting Heritage Statement. The extent of such an appraisal should be proportionate to the asset's importance and no more than is sufficient to understand the impact of the proposal on its significance. The Council will also want to understand how the city's culture and cultural capacity will be affected by developments. Applicants in appropriate developments will be required to submit a Cultural Wellbeing Plan.	Local Plan.
Table 8.1	**Table 8.1 Heritage Topic Paper Summary of Six Principle Characteristics** *Footnote: "Future Characteristics"* *In some cases the growth of the city area will result in the development of new areas with a change in the current use and overall character of a place, creating opportunities for new quality and characteristics of York to emerge. National and international best design practice, as well as the Heritage Topic Paper, should guide these.*	To add guidance for the development of new areas.
Policy D1: Landscape and Setting	**Policy D21: Landscape and Setting** Development proposals will be encouraged and supported where they: i. demonstrate understanding through desk and field based evidence of the local and wider landscape character and landscape quality relative to the locality, and the value of its contribution to the setting and context of the city and surrounding villages, including natural and historic features and influences such as topography, vegetation, drainage patterns and historic land use; ii. conserve and enhance landscape quality and character, and the public's experience of it and make a positive contribution to York's special qualities; iii. demonstrate a comprehensive understanding of the interrelationship between good landscape design, bio-diversity enhancement and water sensitive design; iv. create opportunities to enhance the public use and enjoyment of existing and proposed streets and open spaces; v. recognise the significance of landscape features such as mature trees, hedges, and historic boundaries and York's other ~~most~~ important character elements, and retain them in a respectful context where they can be suitably managed and sustained;	Renumbered to ensure consistency of scale throughout the section. To add clarity.

Policy/Paragraph	Modification proposed	Reason
	vi. take full account of issues and recommendations in the most up to date York Landscape Character Appraisal; vii. include sustainable, practical, and high quality soft and hard landscape details and planting proposals that are clearly evidence based and make a positive contribution to the character of streets, spaces and other landscapes; viii. create a comfortable association between the built and natural environment and attain an appropriate relationship of scale between building and adjacent open space, garden or street. In this respect consideration will be also be given to function and other factors such as the size of mature trees; and ix. avoid an adverse impact on intrinsically dark skies and landscapes, townscapes and/or habitats that are sensitive to ~~excessive~~ light pollution, keeping the visual appearance of light fixtures and finishes to a minimum, and avoiding light spill.	
Para 8.5	Where environmental impact assessments are required, the City of York Council will expect evidence based landscape assessments to follow the latest edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment. Background studies should also reference the most up to date Landscape Character Appraisal for York and English Heritage's the Setting of Heritage Assets (2011) as well as Conservation Area Appraisals and Village Design Statements and neighbourhood plans where they exist.	To add clarity.
Para 8.6	The European Landscape Convention (ELC) created by the Council of Europe and signed by the UK government in 2006, applies to all landscapes, towns and villages and open countryside, including ordinary landscapes and even downgraded landscapes, as well as those that are afforded protection. The ELC defines landscape as "an area, as perceived by people, whose character is the result of the action and interaction of natural and / or human factors" (Council of Europe 2000). It highlights the importance of protecting, managing, planning and creating landscapes; and encourages a wider understanding and appreciation of landscapes, improved knowledge and care, as well as a sense of inspiration, well-being and connection between people and place. Every landscape has value.	To add clarity.
Para 8.8	Trees are a recognised heritage asset. They can individually or as a group, constitute a significant landscape element, e.g. a specimen tree in a square, or an avenue of trees;	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	and they can contribute to the setting of conservation areas and/or listed buildings. Trees also form an important element of the authority's green infrastructure and are covered in Section 9: Green Infrastructure.	
Policy D2: Placemaking	**Policy D12: Placemaking** Development proposals will be supported where they improve poor existing urban and natural environments, enhance York's special qualities and better reveal the significances of the historic environment. Development proposals that fail to take account of York's special qualities, fail to make a positive design contribution to the city, or cause damage to the character and quality of an area will be refused. Development proposals should adhere to the following detailed design points: **i) Urban Structure and Grain** • Enhance, respect and complement the historic arrangement of street blocks, plots and buildings, where possible restoring old patterns of urban grain where these have been damaged or obscured. • Enhance and complement the character and appearance of landscape, city parks, landforms, open space, planting and boundary~~ies and~~ treatment. **ii) Density and Massing** • Demonstrate that the resultant density of a development proposal will be appropriate for its proposed use and neighbouring context. • Demonstrate that the combined effect of development does not dominate other buildings and spaces, paying particular attention to adjacent buildings or parks of architectural or historic significance. **iii) Streets and Spaces** • Promote ease of public pedestrian and cyclist movement and establish natural patterns of connectivity with the fabric of the city. Spaces and routes must be attractive, safe, and uncluttered and clearly prioritise pedestrians and cyclists over	Renumbered to ensure consistency of scale throughout the section. To add clarity.

Policy/Paragraph	Modification proposed	Reason
	vehicles. • Promote legibility through development by providing recognisable routes, hierarchy of routes, intersections, incidental spaces and landmarks. • Are designed to improve the quality of the public realm and the wider environment for all. • Provide a pattern of continuity and enclosure, dependant on circumstances, to reflect the need for different types of space for different types of activity including clearly defining private from public space, and mediate between the two. • Designed to reduce crime and the fear of crime and promote public safety throughout the day and night. **iv) Building Heights and Views** • Respect York's skyline by ensuring that development does not challenge the visual dominance of the Minster or the City Centre roofscape. • Respect and enhance views of landmark buildings and important vistas. **v) Character and Design Standards** • Ensure proposals are not a pale imitation of past architectural styles. • Ensure appropriate building materials are used. • Meet the highest standards of accessibility and inclusion. • Demonstrate the use of best practice in contemporary urban design and place making. • Integrate car parking and servicing within the design of development so as not to dominate the street scene. • Create active frontages to public streets, spaces and waterways. • Create buildings and spaces that are fit for purpose but are also adaptable to respond to change. • Create places that feel true to their intended purpose. • ~~Take into account~~ Maximise sustainability potential ~~as far as possible~~.	
Para 8.12	It is important to communicate the suitability of density proposals in a way that is most easily understood. This can often be difficult for large developments where flexibility is	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	sought at a masterplanning stage. Applications will be encouraged that communicate this through graphical representation (in addition to standard accepted numerical methodologies) through potential plots studies and precedent images. Overall, density should not be applied in an overly uniform way- it should comprise a variety of spatial types. The intensity of development should generally follow the existing pattern of density, but within it should be open amenity spaces. ~~(~~In particular, conversions into flats or houses should provide satisfactory levels of amenity for future occupiers~~)~~. Conversely higher density spots to aid wayfinding and the readability of spaces might be desirable. This should be interpreted together with Building Height and Views section below. Whilst zoning is a useful illustrative concept, density should not be overly use-zoned and should demonstrate a suitable mix of uses, albeit that there is likely to be a ~~majority~~ predominant use for each different area.	
Para 8.13	Development proposals that provide opportunities to promote the enhancement of, or creation of, public space will be supported. Reference should be made to the council's policies on public streets and spaces particularly ensuring that development proposals support the principles set out in the City of York Streetscape Strategy and Guidance (2014). The use and enjoyment of streets and spaces are affected by how empowered people feel to engage in these spaces, through cultural, every leisure and economic activity. Private spaces should feel completely private places they can relax in. Public spaces should feel like genuine public spaces that are welcoming and belong to everyone. Semi private space, especially in housing developments, needs extreme care in design so immediate neighbours can have a sense of their collective ownership and even stewardship. Consideration should be given to Secured by Design principles whilst balancing the need of urban design principles such as attractive connected streets and spaces.	To add clarity.
Para 8.14	Development should demonstrate a detailed evidence based understanding of landscape setting including key views so that development proposals respond positively to local building height and massing character and landscape context. Designs should also integrate roof-top plant into the overall building design avoiding visually detracting roof top plant. Reference should be made to the city's key views as defined in the York Central Historic Core Conservation Area Appraisal key views analysis. Opportunities for creating	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	or revealing new public views should also be considered. For new ~~"tall"~~ landmarks and buildings that stand higher than the surrounding townscape to be considered acceptable they will normally be expected to have a particular high cultural significance or common value. In addition, the taller and more prominent a building, the higher will be the council's expectations over its quality.	
Para 8.15	A proposal should demonstrate an understanding of rhythm and/or balance of compositional design. Suitable ~~B~~building materials should be carefully chosen for their texture, colour, pattern, source and durability, and durable construction techniques and elements of detailing should be chosen. For larger scale developments, where development is at a high level masterplan stage, there should be a clear vision of the type of place it aspires to become in sufficient detail to guide the direction of future plot build out proposals use of a design code setting out parameters may be required whilst providing enough flexibility for uncertain future conditions. The way a building will be used should be considered so as to locate commercial servicing in less sensitive places within a development and to prevent ~~parking strategies~~ parked cars from dominating the street scene. This needs to be balanced to prevent unrealistic expectations leading to abuse, and the development should physically prevent unplanned undesirable use through subtle good design measures. Buildings should also be adaptable so as to facilitate ~~reuse and~~ retention ~~and reuse~~. Large scale developments should not inherently prevent their adaptability- the creation of development blocks and open streets are proven durable formats and will be supported.	To add clarity.
Para 8.16	As part of its commitment to good place-making, the Council is committed to and expects design excellence. There are many UK guides to best practice. The publication of these guides will be ongoing over the course of the Local Plan period. However, they are often still relevant several years after publication and only superseded where directly stated by future publications. Design proposals should be based on best practice and where this can be demonstrated it will support the desirability of the proposal. Current examples are Lifetime Neighbourhoods (DCLG); Building for Life Principles (Design Council); Urban Design Compendium (English Partnerships and The Housing Corporation); By Design (DETR & CABE); Conservation Principles Policies and Guidance (English Heritage) to name a few. On culture and the arts, the Town and Country Planning Association's	To add clarity and to strengthen culture in the Local Plan.

Policy/Paragraph	Modification proposed	Reason
	'Practical Guide 6 'I'd love to live there?' Planning for culture and the arts', aimed at new communities but broadly applicable, may be useful.	
New Policy	**Policy D3: Cultural Provision** Cultural wellbeing is identified as one of the twelve core planning principles underpinning both plan-making and decision-making in the National Planning Policy Framework (NPPF. Development proposals will be supported where they are designed to sustain, enhance, and add value to the special qualities and significance of York's cultural character, assets, capacity, activities, and opportunities for access.. i) Development proposals will be supported where they: • Enable and promote the delivery of new cultural facilities and/or activities and services such as permanent and temporary public arts • Provide facilities, opportunities, and/or resources for cultural programmes and activities, during an/or after the development period • Do not cause the loss of cultural facilities, activities, or services • Do not cause the loss of venues or spaces, including in the public realm, that deliver cultural opportunities, activities, or services ii) The masterplanning on all strategic sites, of whatever scale, will need to include an assessment of the current status and need relating to culture and its provision. This assessment should be included in a Cultural Wellbeing Plan, which should also describe how the four criteria of above section (i) are satisfied. In addition to demonstrating enablement of cultural facilities and/or services, the Plan can also refer to: • Citizenship through participation • Encouragement through leadership • Fostering long term benefits	To strengthen culture in the Local Plan following responses received through the preferred sites consultation.

Policy/Paragraph	Modification proposed	Reason
	• Encouragement of diversity	
New paragraphs	**Explanation** Culture can and does contribute positively to York's local character by responding to the underlying structure, distinctive patterns and forms of development and local culture. Development should deliver a multi-functional public realm comprising streets and spaces that can accommodate a range of appropriate arts and cultural uses and activities both now and in the future, providing animation, vitality and inclusion. Major development schemes and significant schemes at whatever scale should also enable the delivery of permanent and temporary public arts, promoting a multi-disciplinary approach to commissioning artists in the design process itself. Facilities and resources, including funding, for arts and cultural activity both within and beyond the development period itself (for example via a legacy trust), will also be supported. Cultural facilities add value and support to community participation, wellbeing and development. The City of York's residents demonstrate pride in their cultural diversity. The City of York is keen to protect these capacities to engender community cohesion and civic pride. As part of good place-making, cultural quality, assets, and opportunities can also add to the attractiveness and value of development schemes. When a new cultural facility or programme is required, it should be accessible for local residents as well as visitors, and be a place where cultural diversity can be explored and enjoyed. Furthermore, to build on existing opportunities, proposed developments which have a significant impact, at whatever scale and those directly related to the cultural industries, will be required to contribute towards enhancing public realm through the promotion of the public arts, cultural diversity and provision of additional facilities and activities where appropriate. Where needed to manage and promote cultural wellbeing, the council will seek to work with stakeholders as appropriate in the preparation of sustaining, enhancing and adding value to cultural wellbeing in York.	To support new policy D3: Cultural Provision.
Policy D3:	**Policy D11~~3~~: Extensions and Alterations to Existing buildings**	Renumbered to

Policy/Paragraph	Modification proposed	Reason
Extensions and Alterations to Existing buildings	It is important to plan positively for the achievement of high quality design for all development proposals. Proposals to extend, alter or add to existing buildings will be supported where the design: • responds positively to its immediate architectural context and local character and history, in terms of the use of materials and detailing, scale, proportion, landscape~~ing~~ design and the space between buildings; • sustains the significance of a heritage asset and/or its setting and the character and appearance of conservation areas; • positively ~~impacts~~ contributes to ~~on~~ the setting, wider townscape, landscape and views; • protects the amenity of current and neighbouring occupiers, whether residential or otherwise. • Contributes to the function of the area and is safe and accessible. • Protects and incorporates trees that are desirable for retention.	ensure consistency of scale throughout the section. To add clarity.
Para 8.18	An extension would normally be expected to be subsidiary to the original building. Stylistically, it should not be a confused pale imitation of the original. However it would normally be expected to be in keeping with the original building and its context (see policy points above). If a quite different approach to the architectural language of expression is developed, this could be acceptable only if high design quality can be demonstrated.	To add clarity.
Para 8.19	In protecting amenity design considerations should allow for practical provision of lighting, bin storage and recycling, access, cycle and vehicular parking in line with the Council's most up to date standards.	To add clarity.
Policy D5: Listed Buildings	Proposals affecting the special architectural or historic interest of listed buildings (designated heritage assets) will generally be supported where they: i. Preserve ~~sustain~~ the significance and heritage values of the building; and ii. are accompanied by an evidence based heritage statement and justification. Proposals affecting the setting of a listed building will be supported where they protect its	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	setting, including key views, approaches and aspects of the immediate and wider environment that are intrinsic to its value and significance. Alterations and extensions to listed buildings will generally be supported when they do not harm the special architectural or historic interest of the building or its setting, and when proposals have clear and convincing justification.	
Para 8.26	Listed buildings are irreplaceable heritage assets which are recognised as being of special architectural or historic interest in the national context. They are identified on the National Heritage List for England held currently by the Department for Culture, Media and Sport. Buildings on the list enjoy statutory protection through the Planning (Listed Buildings and Conservation Areas) Act 1990. Protection extends to the whole building, inside and outside, its curtilage and certain structures within its domain. The majority of works to listed buildings require listed building consent (in addition to any other consent required through planning legislation), including ~~external attachments~~ fittings, attachments and any decorative schemes of special significance.	To add clarity.
Para 8.27	Applications should be supported by a heritage statement which includes a statement of significance proportionate to the scale and nature of the proposed works, covering the following: • analysis of the significance of the building relevant to the areas of proposed change. This should convey an understanding of the heritage value. It should be noted that the official list description is not a statement of significance; refer to Conservation Principles policies and guidance HE 2008 for further information. • an assessment of the impact of development proposals on the special interest (significance and values) of the building; • an explanation of why the proposed works are desirable or necessary; and • where proposals appear to cause harm to significant aspects of the building, why less harmful ways of achieving desired outcomes have been discounted or are undeliverable. The greater the harm the stronger the justification should be.	To add clarity.
Policy D7: Archaeology	**Policy D6~~7~~: Archaeology**	Renumbered to ensure

Policy/Paragraph	Modification proposed	Reason
	Development proposals that affect archaeological features and deposits will be supported where they are: i. accompanied by an evidence based heritage statement that describes the significance of the archaeological deposits affected and that includes a desk based assessment and, where necessary, reports on intrusive and non-intrusive surveys of the application site and its setting; including characterisation of waterlogged organic deposits, if present; ii. designed to avoid substantial harm to archaeological deposits; and iii. where harm to archaeological deposits is unavoidable, detailed mitigation measures have been agreed with City of York Council that include, where appropriate, provision for deposit monitoring, investigation, recording, analysis, publication, archive deposition and community involvement.	consistency of scale throughout the section. To add clarity.
Para 8.33	The important and complex picture of the development of human settlement and exploitation in the City of York area is constantly being amended and elaborated as a result of archaeological investigations and research. Understanding this picture and the significance of these assets, both designated and undesignated, are fundamental to their conservation, enhancement and management. Development proposals will always need to be accompanied by a heritage statement that is proportionate to the size and impact of development proposals and the nature of archaeological evidence. In all circumstances the City of York Historic Environment Record (HER) must be consulted and advice and guidance sought from the council's historic environment specialists. The significance and value of archaeological remains must always be appropriately assessed as part of a statement of significance drawn up with reference to English Heritage's Conservation Principles, which the Council considers to be appropriate guidance on this matter. The heritage statement may also need to be accompanied by the results of more detailed analysis involving building assessment, deposit monitoring, including characterisation of waterlogged deposits and their hydrological setting, below ground evaluation and documentary research. The Council will expect the heritage statement to examine the potential impacts of development proposals on significance and value using appropriate evidence and analysis. Where harm to archaeological features and deposits is	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	unavoidable, development proposals will be expected to provide detail on appropriate mitigation measures agreed with City of York Council. Where development sites contain deep, wet, archaeological deposits, these mitigation measures may include provision for installation of and data recovery from deposit monitoring devices. Where mitigation measures include physical excavation of deposits, provision must include adequate resources for excavation, analysis, publication, and archive deposition with the Yorkshire Museum. ~~Where substantial harm is unavoidable,~~ Development proposals will also be expected to demonstrate the ~~overriding~~ public benefits ~~of development~~ including community engagement, and lasting educational value through research, publication and display. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.	
Policy D8: Historic Parks and Gardens	**Policy D8: Historic Parks and Gardens** Development proposals affecting historic parks and gardens or their wider setting will be supported where they: i. do not have an adverse impact on the park's fundamental character, amenity, and setting or key views into or out of the park; ii. do not compromise the public's enjoyment of the park; the spatial qualities; the integrity of important landscape features, or the setting of any structures within its boundaries; and iii. are sensitive to the original design intention and subsequent layers of design and the functional evolution of the park or garden and do not prejudice any future restoration.	
New paragraph	Applications should be supported by a heritage statement which includes a statement of significance proportionate to the scale and nature of the proposed works, covering: • analysis of the significance of the park or garden relevant to the areas of proposed change. This should convey an understanding of the heritage value. It should be noted that the official list description is not a statement of significance; • an assessment of the impact of development proposals on the special interest (significance and values) of the park or garden;	

Policy/Paragraph	Modification proposed	Reason
	• an explanation of why the proposed works are desirable or necessary; and • where proposals appear to cause harm to significant aspects of the park or garden, why less harmful ways of achieving desired outcomes have been discounted or are undeliverable. The greater the harm the stronger the justification should be.	
Para 8.39	The City of York Historic Environment Record (HER) is a database of designated and undesignated heritage assets in the City of York. It includes over 6,000 records of archaeological monuments features and deposits, historic buildings, parks and gardens, and finds in York. The HER contains over 1,~~100~~400 reports ("grey literature") on archaeological interventions and building recording; it includes historic maps, an extensive library of aerial photographs, photographs of buildings, national and local publications, including dissertations, conservation management plans, historic buildings assessments and other sources. It also includes Historic Landscape Characterisation data and an emerging, detailed Historic Character Assessment of the area within the outer ring road. Elements of the HER are accessible through the Heritage Gateway website and online mapping of City of York Council.	To provide an update.
Policy D10: The Significance of Non-Designated Heritage Assets	**Policy D7~~10~~: The Significance of Non-Designated Heritage Assets** Development proposals will be encouraged and supported where they are designed to sustain and enhance, ~~and add value to the special qualities and~~ the significance of York's historic environment, including non-designated heritage assets. The significance of non-designated heritage assets and their settings should be assessed in development proposals against the following criteria, namely the: • special architectural or vernacular interest; and/or • townscape and landscape significance; and/or • historic interest; and/or • artistic significance; and/or • archaeological significance; and/or • age and rarity; and/or	Renumbered to ensure consistency of scale throughout the section. To add clarity.

Policy/Paragraph	Modification proposed	Reason
	• community significance.	
Policy D11: Shopfronts	**Policy D12~~11~~: Shopfronts**	Renumbered to ensure consistency of scale throughout the section.
Policy D12: Advertisements	**Policy D13~~12~~: Advertisements** Permission will be granted for the display of advertisements where they: i. are of a scale, design, material, finish, position and number that will not cause harm to visual or residential amenity, or to ~~historic fabric~~ the character of the host building, and will respect the character and appearance of a building or the street scene; and ii. ~~will not create a public safety issue~~ Positively reflect the interests of amenity and public safety; In addition, within conservation areas and on buildings identified as heritage assets, illumination will only be supported where the fittings, wiring and level of illumination is designed to preserve or enhance the historic character and appearance of the building, ~~and~~ area and the premises trade as part of the evening economy.	Renumbered to ensure consistency of scale throughout the section. To add clarity.
Policy D13: Security Shutters	**Policy D14~~13~~: Security Shutters**	Renumbered to ensure consistency of scale throughout the section.
Section 9: Green Infrastructure		
Policy GI1: Green Infrastructure	York's landscapes, geodiversity, biodiversity and natural environment will be conserved and enhanced recognising the multifunctional role of Green Infrastructure in supporting healthy communities, cultural value, a buoyant economy and aiding resilience to climate change. This will be delivered as part of the Council's Green Infrastructure Strategy and subsequently through the following:	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	i. the production of associated management plans to describe, protect and enhance York's biodiversity, with priority given to those designated as Sites of Importance for Nature Conservation (SINCs); ii. the delivery of the aspirations of partner strategy documents and action plans, including <u>the Leeds City Region Green Infrastructure Strategy and any other</u> current regional strategies and any other plans formally approved <u>in the future</u> by the Council as part of the Green Infrastructure Strategy; iii. the protection and enhancement of existing recreational open space in York, and through increasing provision in areas where a deficiency has been identified; iv. maintaining the integrity of existing green corridors and their role in the Green Infrastructure network and enhancing and extending it where possible through major new development; v. recognising the role that Common Land, Village Greens and other important local green spaces play in protecting and enhancing the historic character of York as well as providing important recreational and nature conservation benefits to the city; and vi. Increasing appropriate access to nature and open spaces to cater for the recreational and well-being needs on an increasing population and mitigating a growing pressure on natural habitats and the wildlife and flora it supports. Development proposals will be expected to demonstrate that Green Infrastructure considerations have been taken into account, in line with the criteria above.	
Para 9.3	York's approach is to both continue to protect, enhance and extend where possible biodiversity habitats and landscapes; and also to support the multifunctional benefits of green infrastructure. These include opportunities for sport and recreation, creating safe and attractive walking, cycling and equestrian routes; the provision of ecosystem services such as improvements in air and water quality; cultural value; mitigation and adaptation to climate change, particularly in terms of flood storage in York; an enhanced backdrop and landscape to aid business and attract inward investment <u>and boost the economy</u>; to maintain York as an attractive place to live and promote well-being; and~~,~~ of course, to maintain and enhance biodiversity. York's network of green spaces could work like a	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	connected park, linking the historic city centre to the city's neighbourhoods and countryside through a series of extended strays for walking and cycling, and making use of rivers. Better green infrastructure and cross-connections through York's neighbourhoods should also be encouraged. The Council will deliver a Green Infrastructure strategy in line with Policy GI1.	
Policy GI2: Biodiversity and Access to Nature	In order to conserve and enhance York's biodiversity, any development should where appropriate: i. ensure the retention, enhancement and appropriate management of features of geological, ~~geomorphological, paleoenvironmental~~ or biological interest, and <u>further the aims</u> ~~address the requirements~~ of the current Biodiversity Audit and <u>Biodiversity</u> Action Plan; ii. take account of the potential need for buffer zones around wildlife and biodiversity sites, to ensure the integrity of the site's interest is retained; iii. result in net gain to, and help to improve, biodiversity; iv. enhance accessibility to York's biodiversity resource where this would not compromise their ecological value, affect sensitive sites or be detrimental to drainage systems; ~~v. safeguard, manage and enhance York's existing tree and woodland resource;~~ v~~i~~. maintain and enhance the rivers, banks, floodplains and settings of the Rivers Ouse, Derwent and Foss, and other smaller waterways for their biodiversity, cultural and historic landscapes, as well as recreational activities where this does not have a detrimental impact on the nature conservation value; and vi~~i~~. maintain and enhance the diversity of York's Strays for wildlife.	To add clarity.
Para 9.4	The policy seeks to conserve and enhance all sites and areas of biodiversity value in York. This supports the national approach of a hierarchy of sites as defined in the National Planning Policy Framework. York's Biodiversity Audit (2011) and <u>Biodiversity</u> Action Plan (201~~3~~<u>7</u>) identify the special sites and define their specific value and the best approach to retaining and enhancing this value. These documents should be used alongside Policy GI2 to determine planning applications that could potentially affect any site of biodiversity value.	To add clarity.
Para 9.6	Bio-diversity mitigation and enhancement should be provided on site. Only in very ~~In~~	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	exceptional circumstances, where the proposed development clearly outweighs the nature conservation value of the site and the impact on biodiversity is unavoidable, appropriate mitigation or compensation will be required. This should be achieved through planning conditions and obligations~~. An emerging scheme 'biodiversity offsetting' proposed through the Natural Environment White Paper (2012), would mean that developers would have the option to contribute funds either for use in the locality or to a joint pot of money that would then be used to offset the damage to nature conservation. This scheme is still to be established through Local Nature Partnerships.~~ Biodiversity offsets are measurable conservation outcomes resulting from actions designed to compensate for residual adverse impacts arising from a development after mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of biodiversity.	
Policy GI3: Green Infrastructure Network	In order to ~~conserve~~ protect and enhance York's green infrastructure networks any development should where relevant: i. maintain and enhance the integrity and management of York's Green Infrastructure network, including its green corridors and open spaces; and ii. protect and enhance the amenity, experience and surrounding biodiversity value of existing rights of way, national trails and open access land; and iii. ensure the protection of the hierarchy and integrity of York's local, district and regional green corridors; and iv. create and/or enhance 'stepping stones' and new Green Corridors that improves links between existing corridors, nature conservation sites, recreational routes and other open space.	To add clarity.
Policy GI4: Trees and Hedges	**Policy GI4: Trees and Hedgerows** Development will be supported where it: i. recognises the value of the existing tree cover and hedgerows, their biodiversity value, the contribution they can make to the quality of a development, and its assimilation into the landscape context;	To add clarity

Policy/Paragraph	Modification proposed	Reason
	ii. provides protection for overall tree cover as well as for existing trees worthy of retention in the immediate and longer term and with conditions that would sustain the trees in good health in maturity; iii. retains trees and hedgerows that make a significant contribution to the setting of a conservation area or a listed building, the setting of proposed development, are a significant element of a designed landscape, or value to the general public amenity, in terms of visual benefits, shading and screening. iv. does not create conflict between existing trees to be retained and new buildings, their uses and occupants, whether the trees or buildings be within or adjacent to the site; and v. supplements the city's tree stock with new tree planting where an integrated landscape scheme is required.	
Para 9.10	Trees and hedgerows provide a range of far-reaching environmental benefits; they contribute to biodiversity, the well being of humans, the amenity of York's green infrastructure, and landscapes both rural and urban. It is therefore important that hedgerows, trees and overall tree cover are retained where they are of significant landscape, amenity, nature conservation or cultural value.	To add clarity.
Para 9.11	Trees and hedgerows can constitute a major component of a designed landscape or streetscape, which is of aesthetic, historic or cultural significance~~, for example, New Walk~~. In such instances it is not only the value of an individual tree or hedge that is to be considered but the value of the overall landscape feature of which it plays a part. Development will be supported where such features, and the existing and future public appreciation of them, are substantially protected or enhanced, with an aim to perpetuate the feature.	To add clarity.
Para 9.14	Open spaces protected under this policy include areas that are designated as open space on the proposals map. The Local Plan Evidence Base Study: Open Space and Green Infrastructure (2014) and Update (2017) (or the most up to date study) includes an assessment of sites identified on the proposals map. It also identifies those wards with deficiencies in open space provision.	To add clarity.
Policy GI6: New Open Space	All residential development proposals should contribute to the provision of open space for recreation and amenity. The successful integration of open space into a proposed	To add clarity and to reflect latest

Policy/Paragraph	Modification proposed	Reason
Provision	development should be considered early in the design process. The precise type of on-site provision required will depend on the size and location of the proposal and the existing open space provision in the area. 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 help to overcome them. Requirements will be calculated using the Council's up to date Open Space Assessment and will be in line with the Council's Green Infrastructure Strategy. The Council will encourage on-site provision where possible but off-site provision will be considered acceptable in the following circumstances: i. if the proposed development site would be of insufficient size in itself to make the appropriate provision (in accordance with the Council's standards) feasible within the site; or ii. in exceptional circumstances, if taking into account the accessibility/capacity of existing open space sites/facilities and the circumstances of the surrounding area the open space needs of the proposed residential development can be met more appropriately by providing either new or enhanced provision off-site. Where appropriate, the Council will seek to enter into a Section 106 agreement with the developer for the future management and maintenance of the open space provision, before granting planning permission. iii On Strategic sites, where through strategic masterplanning agreements that provide for green infrastructure approaches which make accessible provision beyond allocated site boundaries. Open space standards ~~as at Table 9.~~1 as set out in the most up to date Open Space Evidence Base documents should still be used as a guide to overall provision. In addition to the delivery of open spaces connected with development, new open space identified on the proposals map at: • OS1: Land North of Manor CE Academy	position on sites.

Policy/Paragraph	Modification proposed	Reason
	• ~~OS2: Land South West of Heslington Playing Fields~~ • OS~~3~~2: Land to North of Poppleton Juniors, Millfield Lane, Poppleton • ~~OS4: Land at Temple Road, Copmanthorpe~~ Indicative strategic greenspace is identified, where appropriate, on strategic sites on the proposals map. The function of this greenspace is principally one of protecting the historic setting and character of the City, though other important functions including ecological impact mitigation have also informed the approach in some instances. This greenspace will be complemented by further on-site provision of local green and open space (as required in this and other relevant sections of the plan), and both should be planned cohesively in order, where appropriate, to: • manage impacts on the cities historic character and setting; • mitigate and compensate for ecological impacts, and provide for ecological enhancement; • meet open space requirements arising from new development; • accommodate drainage infrastructure, flood storage and attenuation; • retain and enhance landscape and heritage features; and • frame pedestrian and cycle linkage. The precise delineation and extent of strategic greenspace will be set through detailed masterplanning and the planning process, and the areas indicated on the proposals map are a guide to general extent based on current understanding of site and other conditions.	
Para 9.18	As part of the Local Plan process, the Open Space, Sport and Recreation Study (2008) has been updated with the Local Plan Evidence Base Study: Open Space and Green Infrastructure (2014) and Update (2017). The designated sites have been revisited and reassessed and all open space has been audited which has resulted in new sites being identified. These are all shown on the proposals map.	To provide an update.
Para 9.19	Proposals that require the delivery of open space through new development should explain how the proposed on-site provision and off-site contributions comply with the Open	To provide an update

Policy/Paragraph	Modification proposed	Reason
	Space standards shown in ~~the Table 9.1 below,~~ the Local Plan Evidence Base Study: Open Space and Green Infrastructure (2014) and Update (2017) and the City of York Commuted Sum Payments for Open Space in New Developments – A Guide for Developers (updated 1st June 2014) and any further updates of these studies.	
Table 9.1 Open Space Standards	Delete.	To future proof the plan as standards are likely to change over the lifetime of the plan.
New Policy	**Policy GI7: Burial and Memorial Grounds** Planning permission for the use of land as a burial/memorial ground will be granted provided that: i. there is an identified local need; ii. the site is accessible by public transport; iii. surface water drainage is adequate and there is no threat to groundwater quality; iv. the proposal would not have an adverse impact on the landscape quality nearby, the historic character and setting of York or residential amenity; and v. the proposal includes a land management and maintenance programme.	To provide the criteria for assessing proposals for burial and memorial grounds.
New Paragraph	**Explanation** Some cemeteries and burial grounds are near to capacity in a number of locations within the Authority area. During the lifetime of the Plan there may be a shortage of burial spaces and we should be aware that as the local population ages the demand for further provision for burial grounds will increase. It is important that burial grounds are accessible and do not aversely affect the amenity of local residents.	To support new policy GI7.
Section 10: Managing Appropriate Development in the Green Belt		
Policy GB1: Development in the 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	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	the Green Belt; ii. it would not conflict with the purposes of including land within the Green Belt; and iii. it would not prejudice <u>or</u> 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 • limited infilling or redevelopment of existing developed sites; 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.	
Section 11: Climate Change		
Policy CC1: Renewable and Low Carbon Energy	**Policy CC1: Renewable and Low Carbon Energy Generation <u>and Storage</u>** <u>New buildings must achieve a reasonable reduction in carbon emissions of at least 28 per cent. This should be achieved through the provision of renewable and low carbon</u>	Previous policies are now out of date following a number of

Policy/Paragraph	Modification proposed	Reason
Generation	technologies in the locality of the development. Proposals should set out how this will be achieved in an energy statement. Renewable and low carbon energy generation developments will be encouraged and supported in York. We will work with developers to ensure that suitable sites are identified and projects developed, working with local communities to ensure developments have their support. Developments on brownfield land will be encouraged. Significant weight will be given to the way in which renewable and low carbon generation schemes contribute to the York Climate Change Framework and Action Plan targets to reduce carbon dioxide emissions in York by 40% by 2020 and 80% by 2050, in line with the 2008 Climate Change Act. All applications will also need to consider the impact the scheme may have on: i. York's historic character and setting, including the sensitivity of the scheme to the surrounding landscape and proximity to air fields and other sensitive land use, including Conservation Areas; ii. local communities and residential amenity resulting from development, construction and operation such as air quality, atmospheric emissions, noise, odour, water pollution and the disposal of waste; iii. the location in terms of the scale of the proposal and new grid connection lines; iv. national and internationally designated heritage sites or landscape areas, including the impact of proposals close to their boundaries; v. nature conservation sites and features, biodiversity and geodiversity, including protected local sites and other sites of nature conservation importance, and potential effects on setting, habitats, species and the water supply and hydrology of such sites; vi. the road network, taking account the accessibility of the site by road and public transport and also the proximity to the renewable fuel source; and vii. agriculture and other land based industries.	changes to government legislation and guidance. Local strategic priorities have also altered. The revised policies more strongly tie together the social and economic benefits of low carbon developments which consider sustainable design and construction principles.

Policy/Paragraph	Modification proposed	Reason
	Proposals for renewable and low carbon energy storage developments will be supported and encouraged. Developments should be sited a suitable distance from major residential areas and have suitable fire suppression procedures. Any application for renewable energy would need to meet the criteria above and consider the areas of potential and other technical requirements identified in the Council's most up to date Renewable Energy Study. Strategic sites will be required to produce Energy Masterplans to ensure that the most appropriate low carbon, renewable and energy efficient technologies are deployed at each site, taking into account local factors and the specifics of the masterplans. ~~The generation of renewable and low carbon energy will be supported and encouraged within the context of sustainable development and responding to climate change. New developments will be required to incorporate renewable and low carbon sources of energy and energy efficiency.~~ ~~Significant weight will be given to the wider environmental, economic and social benefits arising from renewable energy schemes together with individual and cumulative effects that schemes may have on:~~ ~~i. local communities and residential amenity resulting from development, construction and operation such as air quality, atmospheric emissions, noise, odour, water pollution and the disposal of waste;~~ ~~ii. the location in terms of the scale of the proposal, new grid connection lines, the visual impact on York's historic character and setting , the sensitivity of the surrounding landscape and proximity to air fields and other sensitive landuse;~~ ~~iii national and internationally designated heritage sites or landscape areas, including the impact of proposals close to their boundaries;~~ ~~iv nature conservation sites and features, biodiversity and geodiversity, including internationally designated and other sites of nature conservation importance, and~~	

Policy/Paragraph	Modification proposed	Reason
	~~potential effects on setting, habitats, species and the water supply and hydrology of such sites;~~ ~~v the road network, taking account of the accessibility of the site by road and public transport and also the proximity to the renewable fuel source; and~~ ~~vi agriculture and other land based industries.~~ ~~The following sites are allocated for Renewable Energy (Solar Farms) and are identified on the proposals map:~~ • ~~RE1:Knapton Moor 2, Wetherby Road~~ • ~~RE2:Land to the North West of Hermitage Farm (a - b)~~ • ~~RE3:Land at Harewood Whin, Rufforth (a-d)~~ ~~Any application for renewable energy would need to meet the criteria above and consider the areas of potential and other technical requirements identified in the Council's most up to date Renewable Energy Study.~~	
Paras 11.2-11.8	Delete previous explanation text and replace with the following: Renewable energy is: "energy that is derived from natural processes (e.g. sunlight and wind) that are replenished at a higher rate than they are consumed. Solar, wind, geothermal, hydropower, bioenergy and ocean power are sources of renewable energy" (International Energy Agency). Renewable and low carbon energy generation includes absorption cooling, biomass, CHP, ground cooling, GSHP, PV, solar hot water and wind energy. Local Planning Authorities have a statutory obligation, under Section 19(1A) of the Planning and Compulsory Purchase Act 2004 to include "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change". The National Planning Policy Framework (2012) (NPPF) recognises the key role of planning in securing "radical reductions in greenhouse gas emissions" and states that Local Planning Authorities should "have a	See above, proposed new paragraphs support the revised Policy CC1.

Policy/Paragraph	Modification proposed	Reason
	positive strategy to promote energy from renewable and low carbon sources" and "consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources". Policy CC1 encourages the development of renewable and low carbon energy generation. The York Renewable Energy Study (2014) assessed the city's potential for generating renewable energy and concluded that there is potential to generate renewable energy from a variety of available sources including wind, solar and hydro. The study also assessed the impacts of such potential on the city and recommends potential areas where renewable energy could be considered in the future (subject to further feasibility studies and full planning processes.) The Renewable Energy Study (2014) included a series of maps which highlight potential areas across the city that could be considered for renewable energy generation in the future. These maps are to encourage consideration of renewable energy generation only. This does not preclude future projects from coming forward that are not highlighted in this study. However, all applications will need to meet Policy CC1. To assist in the assessment of proposals coming forward the Council will encourage applicants to use Managing Landscape Change: Renewable and Low Carbon Energy Developments – A Sensitivity Framework of North Yorkshire and York (2012) in preparing their planning applications for renewable electricity and heat production installations. Commercial scale proposals for low carbon and renewable energy schemes that respond favourably to the opportunities and sensitivities identified in these documents and which meet the Spatial Principles, will be encouraged and supported. Energy storage is crucial to increasing the proportion of renewable and low carbon energy in the system. This is an emerging area and the Council will continue to work with relevant experts to ensure that suitable energy storage opportunities are identified and brought forward. Supplementary Planning Guidance will be produced in due course, including on safety requirements for storage sites.	

Policy/Paragraph	Modification proposed	Reason
	Carbon reduction Alongside the planning obligation outlined in the Planning and Compulsory Purchase Act (2004) and NPPF as outlined in above, the UK government is committed to achieving carbon reduction targets outlined in the UK Climate Change Act (2008) and the ratified Paris Agreement. At a local level, CYC have outlined their commitment to achieving carbon reduction targets of 40% by 2020 and 80% by 2050, within the Climate Change Framework for York. This is in line with the binding national targets set in the Climate Change Act. CYC outline in their City Vision 2030, that York aspires to be the 'greenest city in the north', where 'sustainability underpins everything that we do'. Setting a target for carbon reduction that goes beyond the Target Emission Rate of Part L of the Building Regulations will enable York to deliver on this ambition. Part 1 of the Planning and Energy Act (2008) gives powers to LPAs to set policy to reduce carbon emissions in new developments. Point "a" gives powers to require that a proportion of energy used in a development is from renewable or low carbon sources. This was not amended in the Deregulation Act and therefore these powers remain. Whilst the Deregulation Act removed point "c" which relates to powers to set targets to exceed the energy efficiency requirements of Building Regulations, it is possible that compliance with a carbon reduction target will be more cost effective with the deployment of enhanced energy efficiency measures rather than renewable and low carbon sources. The Council will therefore permit developments to comply with the target of at least a 28% reduction in carbon emissions through either enhanced energy efficiency measures, use of renewable and low carbon sources, or a mix of both, where appropriate. The target of 28% is aligned to the Committee on Climate Change's analysis of the Fourth Carbon Budget of the Climate Change Act, which determines the most cost-effective path for reducing emissions from buildings. This target applies to all developments	

Policy/Paragraph	Modification proposed	Reason
Policy CC2: Sustainable Design and Construction	**Policy CC2: Sustainable Design and Construction <u>of New Development</u>** <u>Developments which demonstrate high standards of sustainable design and construction will be encouraged. Development proposals will be required to demonstrate energy and carbon dioxide savings in accordance with the energy hierarchy: reducing energy demand, using energy and other resources efficiently and generating low carbon or renewable energy. Development proposals will be expected to consider good practice adaptation principles for climate resilience in their design, construction and operation.</u> **<u>Sustainable Design and Construction of New Development</u>** <u>Proposals will be supported where they meet the following:</u> i. <u>All new residential buildings should:</u> • <u>achieve at least a 19% reduction in Dwelling Emission Rate compared to the Target Emission Rate (calculated using Standard Assessment Procedure (SAP) methodology as per Part L1A of the Building Regulations 2013); and</u> • <u>achieve a water consumption rate of 110 litres per person per day (calculated as per Part G of the Building Regulations).</u> <u>All new non-residential buildings with a total internal floor area of 100m^2 or greater should achieve BREEAM 'Excellent' (or equivalent);</u> <u>Strategic Site developments should undertake a BREEAM Communities assessment (or equivalent);</u> ii. <u>All new residential and non-residential developments will be required to submit an Energy Statement which demonstrates how these requirements will be met. This should include a sustainability checklist, which shows how principles for sustainable design, construction and operation will be achieved.</u>	Previous policies are now out of date following a number of changes to government legislation and guidance. Local strategic priorities have also altered. The revised policies more strongly tie together the social and economic benefits of low carbon developments which consider sustainable design and construction principles.

Policy/Paragraph	Modification proposed	Reason
	Conversion of Existing Buildings and Change of Use Applications for conversion of existing residential buildings or change of use to residential should achieve BREEAM Domestic Refurbishment 'Very Good' and non-residential conversions or change of use will need to achieve BREEAM 'Excellent'. **Consequential Improvement to Existing Dwellings** When applications are made to extend dwellings, proposals will be expected to demonstrate reasonable and proportionate improvements to the overall energy performance of the dwelling. This will be in addition to the requirements of Part L of the Building Regulations. ~~All new development will be expected to consider the principles of sustainable design and construction and to make carbon savings through reducing energy demand, using energy and other resources efficiently and by generating low carbon/renewable energy in accordance with the energy hierarchy.~~ ~~**Sustainable Design and Construction of New Development**~~ ~~Proposals will be supported where they meet the following:~~ ~~i. all new developments will be required to submit a Sustainability Statement including:~~ ~~- a Low Carbon Energy Strategy, and~~ ~~- an outline of how key principles for sustainable design and construction and operation will be achieved.~~ ~~ii. pre the introduction of the expected Housing Standards Review and zero Carbon targets, all new residential buildings should achieve Code for Sustainable Homes Level 4;~~ ~~iii. all new non-residential buildings should achieve BREEAM 'Excellent' (or equivalents);~~ ~~iv. all new developments will demonstrate as part of their Low Carbon Energy Strategy, how they will achieve current Part L standards of Building regulations, and how the zero carbon homes standards once introduced will be achieved (including Allowable Solutions). Developers will be required to achieve zero carbon standards through~~	

Policy/Paragraph	Modification proposed	Reason
	~~energy efficiency and carbon compliance on site. Where this is not technically possible or viable, developers will be expected to explore with the council meeting zero carbon standards through local off-site Allowable Solutions;~~ ~~v. Strategic Site allocation would need to undertake a BREEAM Communities Assessment (or equivalent);~~ ~~**Conversion of Existing Buildings and Change of Use**~~ ~~vi. applications for conversion of existing residential buildings or change of use to residential will need to achieve BREEAM Domestic Refurbishment 'Very Good' and non residential conversions or change of use will need to achieve BREEAM 'Excellent;~~ ~~**Consequential Improvements to Existing Dwellings**~~ ~~vii. when applications are made to extend dwellings, proposals will be expected to demonstrate reasonable and proportionate improvements to the energy performance of the dwelling. This will be in addition to the requirements under Part L of the Building Regulations;~~ ~~**District Heating and Combined Heat and Power Networks**~~ ~~viii. where technically viable, appropriate for the development, and in areas with sufficient existing or potential heat density, developments of 1,000 or more square metres or 10 dwellings or more (including conversions where feasible) should propose heating systems according to the following hierarchy:~~ ~~a. Connection to existing district heating networks.~~ ~~b. Construction of a site wide district heating network served by a new low carbon heat source.~~ ~~c. Collaboration with neighbouring development sites or existing heat loads/sources to develop a viable shared district heating network.~~ ~~d. In areas where district heating is currently not viable, but there is potential for future district heating networks, all development proposals will need to demonstrate how sites have been designed to allow for connection to a future district heating~~	

Policy/Paragraph	Modification proposed	Reason
	~~network.~~ ~~All of the above policy requirements are required unless it can be demonstrated that such requirements are not technically or economically viable.~~	
Paras 11.9-11.32	Policy CC2 aims to ensure that all new developments achieve high standards of sustainable design and construction, by minimising greenhouse gas emissions, using resources efficiently, enhancing climate change resilience and promoting health and wellbeing. A Sustainability Statement (including a Low Carbon Energy Strategy and a Sustainability Checklist) will be required for all new residential and non-residential applications. **Energy efficiency** Research carried out by Carbon Descent on behalf of the Council indicated that, without positive intervention to reduce CO_2 emissions, emissions in York will rise by around 31% by 2050.[4] The report highlights the substantial role that energy efficiency measures, and renewable energy or low carbon energy generation will need to play in both residential and non-residential development if the city is to meet its own greenhouse gas emissions targets for 2020 and 2050, and the Climate Change Act's 2050 target. The Deregulation Act 2015, the ministerial statement following the Housing Standards Review, and the HM Treasury report ('Fixing the foundations: creating a more prosperous nation') all directly affect Policy CC2: Sustainable Design and Construction for housing. Currently, councils in England can no longer demand energy efficiency improvements beyond the requirements of Building Regulations, require new homes to achieve zero carbon standards, implement 'allowable solutions', or ask for new housing to meet any level of the Code for Sustainable Homes (CfSH). However, a 19% reduction in Building Emission Rate versus Target Emission Rate is allowable until the commencement of the amendment to the Energy and Planning Act 2008; this is equivalent to energy performance required for CfSH level 4.	See above, proposed new paragraphs support the revised Policy CC2.

[4] Carbon Descent 2010: Carbon modeling study for York.

Policy/Paragraph	Modification proposed	Reason
	Future changes to energy efficiency legislation From April 2018, private landlords must ensure their properties in England and Wales reach at least an Energy Performance Certificate (EPC) rating of E, under the Energy Efficiency (Private Rented Property)(England and Wales) Regulations 2015. This legislation will require improvements to all F and G rated properties, subject to exemptions. **Water efficiency** The new optional technical standard for water consumption in the home states that LPAs may request new housing developments to achieve 110 litres/person/day (compared to the 125 litres/person/day required in current Building Regulations Part G), where they can justify the need. Yorkshire Water is classified as being under 'moderate stress' by the Environment Agency (2013), for current and future scenarios. The Humber river basin district river basin management plan states that 'implementing water efficiency measures is essential to prepare and be able to adapt to climate change and increased water demand in future'. It also cites local plan policies requiring 110 litres/person/day in new homes as an effective measure for water demand management in the area. **BREEAM** BREEAM is used widely in local planning policy in the UK to demonstrate high standards of sustainable design and construction. Achieving the BREEAM 'Excellent' standard requires mandatory minimum standards, which go beyond the minimum requirements of building regulations. **Consequential Improvements** It is estimated that 80% of buildings in the UK will still be in use by 2050. As such, it is important that these buildings use energy in the most efficient way. Of the total number of planning applications received in York, almost 50% of them are for householder development.	

Policy/Paragraph	Modification proposed	Reason
	'The Condition of Private Housing in York' (BRE 2015) report indicates the potential for improving the energy performance of existing homes. The report estimates that within the private sector in York there are 10,037 dwellings (13%) with less than 100mm of loft insulation, and only 22% of dwellings with lofts have 250mm+ of loft insulation. There are an estimated 22,608 dwellings (˜30%) with un-insulated cavity walls and 13,839 with solid walls (˜19%). As such, the Council will support and encourage consequential improvements when applications for extensions to dwellings are made to help improve energy efficiency. Since consequential improvements for non-residential buildings are required for the Building Regulations this part of the policy focuses solely on housing. The Council will support homeowners in delivering efficiency improvements by identifying financial support initiatives that are applicable to the proposed energy efficiency measures. The Council will encourage the most of straightforward opportunities for improvement such as loft and cavity wall insulation, draught proofing, improved heating controls and replacement boilers. The improvements sought by the Council will be reasonable and proportionate to the costs of the extension/development proposed and the measures of CO_2 reduction benefit. **Climate resilience** National and local climate change risk assessments demonstrate the current and predicted future impacts of climate change in the UK. The NPPF states that planning plays a key role in minimising vulnerability and providing resilience to the impacts of climate change. For the built environment, the priority areas for adaptation are considered to be flood management and sustainable drainage, water efficiency and minimising risks from overheating. For York, the anticipated annual costs of damage from climate-related incidents is predicted to be between £95m and £158m by 2050. Developments which conduct a climate risk assessment and include adaptation measures to minimise climate related risks and costs of damage will be encouraged.	

Policy/Paragraph	Modification proposed	Reason
New Policy	**CC3: District Heating and Combined Heat and Power Networks** The Council strongly supports the development of decentralised energy, including (C)CHP distribution networks. All new developments will be required to connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks, unless it can be clearly demonstrated that doing so is not feasible or that utilising a different energy supply would be more sustainable. Proposals for development within heat priority areas and all sufficiently large or intensive developments must demonstrate that heating and cooling technologies have been selected in accordance with the following heating and cooling hierarchy, unless it can be clearly demonstrated that such requirements are not economically viable and/ or that an alternative approach would be more sustainable: i. Connection to existing (C)CHP distribution networks; ii. Site wide renewable distribution networks including renewable (C)CHP; iii. Site wide gas-fired (C)CHP distribution networks; iv. Renewable communal heating/ cooling networks; v. Gas-fired communal heating/ cooling networks; vi. Individual dwelling renewable heating; and vii. Individual dwelling heating, with the exception of electric heating. All (C)CHP systems are required to be scaled and operated in order to maximise the potential for carbon reduction. Developments that do not connect to or implement (C)CHP or communal heating networks should be 'connection-ready'. Energy Statements must be provided to demonstrate and quantify how development will comply with the energy requirements of this policy. Sustainability and energy statements should set out a level of detail proportionate to the scale of development. The Council will	Previous policies are now out of date following a number of changes to government legislation and guidance. Local strategic priorities have also altered. The revised policies more strongly tie together the social and economic benefits of low carbon developments which consider sustainable design and construction principles.

Policy/Paragraph	Modification proposed	Reason
	work proactively with applicants on major developments to ensure these requirements can be met.	
New paragraphs	The NPPF requires the Local Plan to have a positive strategy to mitigate and adapt to climate change in line with the objectives and provisions of the Climate Change Act 2008. LPAs should adopt proactive strategies and design their policies to maximise renewable and low carbon energy development, and identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems. The UK Government Heat Strategy outlines the significant role that (C)CHP could play in decarbonising the UK gas grid, offering a future-proofed, flexible and efficient solution to local energy supply. The Climate Change Action Plan for York also recognises that to achieve the ambitious 2020 city-level target of a 40% reduction in carbon emissions, and the 2050 target of the Climate Change Act 2008, new developments will need to maximise decentralised energy and Combined Heat and Power schemes. 'Decentralised energy' is energy that is generated near to the point of use, rather than at a large plant farther away, supplied through the national grid. (C)CHP refers to both combined cooling, heating and power (CCHP) and combined heating and power (CHP). Where the policy refers to 'communal heating/cooling networks', this refers to systems that distribute heating and cooling to a number of dwellings within one building but do not use (C)CHP as their source (i.e. they do not include power generation). 'Distribution networks' are systems that connect two or more distinct buildings. (C)CHP distribution networks can work at a range of scales from a single building up to a city and can provide low or zero carbon power, heat and cooling in a cost-effective, efficient and environmentally sound way. (C)CHP removes the need for individual gas boilers and large plant rooms, which provides flexibility in building design and maximises space for living and amenity. The Council will strongly support the use of decentralised energy in new developments,	See above, proposed new paragraphs support new Policy CC3.

Policy/Paragraph	Modification proposed	Reason
	and particularly (C)CHP distribution networks, with the aspiration that this will help achieve the targets set in the Climate Change Action Plan for York. The Council will work with developers during pre-application discussions, in order to facilitate the development of district heating networks and buildings that are 'connection ready'. A Leeds City Region-wide heat mapping study in 2014 identified 91 financially viable district heating opportunities across the region, including in York. Two heat network schemes in York Central and the surrounding city of York and surrounding the area of York Hospital have since been further developed in feasibility studies which demonstrate financial viability. Therefore, there is a strong evidence base to support the viability of heat networks in York. All new developments should select heating systems in accordance with the heating and cooling hierarchy. Applying a hierarchical approach to the selection of heating and cooling technologies offers a reasoned method through which to make the most appropriate choice and encourages the use of the solution with the lowest carbon emissions. Where developments fall within heat priority areas, as shown on the Heat Priority Area Map, the provision of new (C)CHP distribution networks should be considered feasible unless it can clearly be demonstrated otherwise for financial, technical or sustainability reasons. Outside the heat priority areas, the provision of new (C)CHP distribution networks should be considered feasible for sufficiently large or intensive developments, unless it can be clearly demonstrated otherwise for financial, technical or sustainability reasons. Where sites have a variable density and it can be shown that the use of a (C)CHP distribution network across the whole of the site is not feasible, consideration must be given to a partial solution on the higher density elements of the site. Sufficiently large or intensive developments are defined as any of the following:	

<table>
<tr><th>Policy/Paragraph</th><th>Modification proposed</th><th>Reason</th></tr>
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residential only developments of at least 50 dwellings per hectare and/or at least 300 dwellings;
residential only developments of 35 dwellings or more that are located near a significant source of heat; and
mixed developments of 50 dwellings or more that include either two or more uses or a single use that would consume significant amounts of energy, such as a swimming pool.

It would be expected that the most appropriate solution for minor residential developments would be to incorporate future proofing measures to allow for the subsequent connection of the building to larger heat networks as they are constructed. Developments will be ‘connection-ready’ if they use a centralised communal wet heating system rather than individual gas boilers or electric heating and safeguard the appropriate pipe routes and plant room space for the installation of Heat Interface Units (see Table 3). Proposals must comply with the minimum requirements outlined in the Chartered Institute of Building Services Engineers (CIBSE) Code of Practice for Heat Networks.

Table 1: Indicative space requirements for heat exchange substation equipment within building plant rooms
<table>
<tr><th>Heating Capacity, kW (space heating + ventilation)</th><th>Approximate building size, m3</th><th>Space required by the heating equipment, m2</th></tr>
<tr><td>30</td><td>1,000-1,500</td><td>2</td></tr>
<tr><td>200</td><td>10,000-15,000</td><td>4</td></tr>
<tr><td>400</td><td>20,000-30,000</td><td>5</td></tr>
<tr><td>800</td><td>40,000-60,000</td><td>6</td></tr>
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</td><td></td></tr>
<tr><td colspan="3">Section 12: Environmental Quality and Flood Risk</td></tr>
<tr><td>Para 12.2</td><td>There are a number of areas within York where the ~~Council is failing to meet its legal requirement to comply with~~ national health based air quality objectives are being exceeded. Despite the introduction of ~~two~~ three Air Quality Action Plans (AQAPs) the ~~health based~~ annual average NO_2 objective continues to be exceeded at many</td><td>To add clarity and to provide an update.</td></tr>
</table>

Policy/Paragraph	Modification proposed	Reason
	locations particularly within the ~~around the~~ inner ring road and city centre ~~and more recently further air quality issues have been identified in suburban locations~~. The main source of air pollution in York is traffic. Given that air is not static and pollutants are generated across the city as people travel between places, emissions to air must be considered in a city wide context to address cumulative air quality impacts.	
New Paragraph	York has developed an overarching Low Emissions Strategy (2012) (LES) which aims to reduce tailpipe emissions from individual vehicles and encourage the uptake of alternative fuels and low emission vehicle technologies. City of York Council's Air Quality Action Plan 3 (2015) (AQAP3) sets out how York intends to continue to deliver this ambitious and pioneering LES and to work towards becoming an internationally recognised ultra-low emission city. Headline measures for consideration include provision of low emission infrastructure and reducing emissions from new development.	To provide an update.
Para 12.3	Control of development through the planning process is one of the key delivery mechanisms by which potential adverse environmental impacts or adverse human health effects can be controlled. ~~, helping to achieve two of the Council's corporate priorities: the protection of vulnerable people and protection of the environment.~~ By allowing appropriate development and encouraging good design, planning policies and decisions should minimise the adverse impacts of development and, where possible, enhance the natural and local environment.	To remove reference to previous Council Plan.
Policy ENV1: Air Quality	Development will only be permitted if the impact on air quality is acceptable and mechanisms are in place to mitigate adverse impacts and ~~reduce~~ prevent further exposure to poor air quality. This will help to protect human health. To establish whether air quality impacts are acceptable all minor and major planning applications are required to identify sources of emissions to air from the development and submit an Emissions Statement. This should qualitatively identify all new emissions likely to arise as a result of the proposal and demonstrate how these ~~identifying how these emissions~~ will be minimised and mitigated against as part of the development. For major developments a more detailed quantitative Emissions Strategy may be required. This must ~~to~~ fully assess and quantify total site emissions in terms of potential damage costs to both health and the environment both with and without mitigation measures in place.	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	Further guidance will be made available to assist applicants with this process. For major developments with potentially significant air quality impacts, a full Air Quality Impact Assessment should be undertaken to establish the resultant impact on local air quality (in terms of change in ambient concentrations of air pollutants within the vicinity of the development site). Where a development will introduce new relevant exposure in an area of existing, or future air quality concern, an exposure assessment will also be required. This should detail current and expected air quality conditions and assess the suitability of the location for human occupation. Where there is potential for new occupants to be exposed to unacceptable levels of air pollutants, an exposure mitigation strategy will be required. The Council will review the significance of the air quality impacts in line with local and national guidance. The exercise of professional judgement by both the organisation preparing the air quality assessment and the local authority officers when they evaluate the findings is an important part of the assessment of significance. Evaluation of air quality impacts will take into account factors such as the number of people affected, the absolute levels and the predicted magnitude of the changes in pollutant concentrations. The evaluation will also take into account ~~of how the impacts relate to the requirements of local air quality principles~~ the likely emissions impacts associated with the development and if the proposed mitigation is considered reasonable and proportionate. New development should support and contribute towards delivery of City of York Council's Air Quality Action Plan (AQAP).	
Para 12.4	Figure 12.1 overleaf shows York's current Air Quality Management Areas (AQMAs) ~~and areas where elevated levels of NO_2 have been recorded~~. During the lifetime of the plan, areas of air quality concern may change and further AQMAs may need to be declared in the future.	To add clarity.
Para 12.6	Applicants must use 'best endeavours' to minimise total emissions from their sites, including transport to and from them. This will include requirements to promote and incentivise the use of low emission vehicles and fuels and in some cases the provision of, or financial contribution towards the cost of low emission vehicles and associated	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	infrastructure. Examples include the provision of on-site electric vehicle recharging infrastructure and/or financial support for the provision low emission public transport services such as public transport and waste collection. The actual measures required will be site specific depending on the scale and location of the development and the connecting transport routes. A Low Emission Supplementary Planning Document (SPD) will be prepared which will set out how the Council will consider and how applicants should approach, planning applications that could have an impact on air quality. Minor planning applications are those proposals for 9 or less dwellings/up to 1,000sqm commercial floorspace and major planning applications are those proposals for 10 or more dwellings/over 1,000sqm commercial floorspace). ~~The SPD will include an Emissions Statement pro forma, to accompany all minor planning applications (proposals for 9 or less dwellings/up to 1,000sqm commercial floorspace) and major planning applications (proposals for 10 or more dwellings/over 1,000sqm commercial floorspace).~~	
Para 12.7	A detailed Emissions Assessment and/or a full Air Quality Impact Assessment are likely to be required for major planning applications that: • generate or increase traffic congestion; • give rise to significant change in traffic volumes i.e. +/- 5% change in annual average daily traffic (AADT) or peak hour flows within AQMAs or +/- 10% outside AQMAs; • give rise to significant change in vehicle speeds i.e. more than +/- 10 kilometres per hour on a road with more than 10,000 AADT (or 5,000 AADT where it is narrow and congested); • significantly alter the traffic composition on local roads, for example, increase the number of heavy duty vehicles by 200 movements or more per day; • include significant new car parking, which may be taken to be more than 100 spaces outside an AQMA or 50 spaces inside an AQMA. This also includes proposals for new coach or lorry parks; • introduce new exposure close to existing sources of air pollutants, including road traffic, industrial operations, agricultural operations; • include biomass boilers or biomass fuelled Combined Heat and Power (CHP) plant (considerations should also be given to the impacts of centralised boilers or CHP plant	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	burning other fuels within or close to an AQMA); • could give rise to potentially significant impacts during construction for nearby sensitive locations (e.g. residential areas, areas with parked cars and commercial operations that may be sensitive to dust); ~~and/or~~ • will result in large, long-term construction sites that would generate large HGV flows (>200 movements per day) over a period of a year or more; and/or • requires an Environmental Impact Assessment (EIA)	
Para 12.12	The nature of the assessment required will be dependent on the scale and type of the proposed development. Further guidance is set out in national standards such as ~~British Standard 5228-2: Code of practice for noise and vibration control on construction and open sites. Vibration (2009), British Standard 6472-1: Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting' (2008), British Standard 4142: Method for rating industrial noise affecting mixed residential and industrial areas (1990), British Standard 8233: Sound insulation and noise reduction for buildings Code of practice (1999) and British Standard 5228-1: Code of practice for noise and vibration control on construction and open sites Noise (2009), alongside the Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Light GN01 (2011).~~ British Standard 4142:2014 Method for rating industrial noise affecting mixed residential and industrial areas, British Standard 8233:2014 Sound insulation and noise reduction for buildings Code of practice, British Standard 5228-1:2009 + A1:2014 : Code of practice for noise and vibration control on construction and open sites Noise, British Standard 5228-2:2009 + A1:2014: Code of practice for noise and vibration control on construction and open sites Vibration, and British Standard 6472-1:2008 Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting', alongside the Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Light GN01:2011 and the DEFRA Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems:2005. Locally specific guidance on interpretation of these standards will be provided in a forthcoming Supplementary Planning Document.	To provide an update.
Para 12.23	Developers must submit an appropriate contamination assessment for sites that are indentified as potentially contaminated ~~land~~ or for sites where the proposed use would be particularly vulnerable to contamination such as housing with gardens. The level of detail	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	required in the assessment will be dependent on the <u>potential</u> contamination identified. As a minimum, a contamination assessment should include a Phase 1 investigation – which consists of a desk study, a site walkover and a conceptual site model. However, if contamination is known or suspected to an extent which may adversely affect the development, a Phase 2 investigation may be required to support the application. Guidance on undertaking a contamination assessment can be found in British Standard 10175, Investigation of Potentially Contaminated Sites (2011) and Model Procedures for the Management of Land Contamination (CLR11) (2004). The Yorkshire and ~~Humberside~~ <u>Lincolnshire</u> Pollution Advisory ~~Council's~~ <u>Group's</u> Development on Land Affected by Contamination <u>guidance</u> is updated annually and also provides technical guidance for developers, landowners and consultants to promote good practice for development on land affected by contamination.	
Para 12.26	The term "flood risk" is a combination of the probability and the potential consequences of flooding, <u>where land not normally covered by water becomes covered with water,</u> from all sources – including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.	To add clarity.
Para 12.31	The level of detail provided within a flood risk assessment will depend on the scale of the development and flood risks posed. The Environment Agency's flood risk matrix gives standing advice on the scope and extent of flood risk assessments. More detailed policies for determining a planning application within the resultant flood zone classification are contained in the SFRA (or its successor). <u>Guidance on the preparation of a flood risk assessment is also available in the SFRA.</u>	To add clarity.
Para 12.33	<u>The City of York Local Flood Risk Management Strategy (2015) identifies the wider set of policies and strategic plans that need to be considered in the development of any proposals and applicants should consider its content</u>. ~~The Environment Agency's (EA) Ouse Catchment Flood Management Plan (July 2010) states that flood risk is not the same in all of the catchment. The Ouse catchment is, therefore, divided into ten sub-areas which have similar physical characteristics, sources of flooding and level of risk. This York sub-area covers the River Ouse from just upstream of York to Kelfield downstream. Policy Option 5 - Areas of moderate to high flood risk where the Environment Agency can~~	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	~~generally take further action to reduce flood risk - has been selected for this sub-area, as the EAs vision is to reduce existing flood risk. Actions to implement the policy include:~~ • ~~work in partnership to identify the requirements for improving the standard of protection at key locations;~~ • ~~with English Heritage identify flood risk to Scheduled Ancient Monuments;~~ • ~~work in partnership with City of York Council to reduce the risk of flooding from surface water;~~ • ~~work with landowners and other organisations to change the way land is managed on the River Foss and slow the rate at which floods are generated; and~~ • ~~review the current pumping regime for pumping stations at Holgate Beck and Burdyke.~~	
Para 12.34	~~The City of York Local Flood Risk Management Strategy due to be published in early 2015, will set out how many of these actions will be carried out.~~	To provide an update.
Para 12.35	~~Catchment Flood Management Plans are due to be incorporated within River Basin Management Plans under the Water Frameworks Directive~~	To provide an update.
Para 12.36	Sufficient information is required to assess the flood risk and drainage impacts of any proposed development, guidance on the required information is contained in the SFRA and the emerging City of York Council Sustainable Drainage Guidance for Developers. As a minimum, all full planning applications submitted should include: • a sufficiently detailed topographical survey showing the existing and proposed ground and finished floor levels (in metres above Ordnance Datum (m AOD) for the site and adjacent properties; and • complete drainage details (including Flood Risk Assessments when applicable) to include calculations and invert levels (m AOD) of both the existing and proposed drainage system included with the submission, to enable the assessment of the impact of flows on the catchment and downstream watercourse to be made. Existing and proposed surfacing shall be specified.	To add clarity.
Policy ENV5: Sustainable	For all development on brownfield sites, surface water flow shall be restricted to 70% of the existing runoff rate (i.e. 30% reduction in runoff), unless it can demonstrated that it is not reasonably practicable to achieve this reduction in runoff.	To add clarity.

Policy/Paragraph	Modification proposed	Reason
Drainage	Sufficient attenuation and long term storage should be provided to ensure surface water flow does not exceed the restricted runoff rate. Such attenuation and storage measures must accommodate at least a 1 in 30 year storm. Any design should also ensure that storm water resulting from a 1 in 100 year event ~~20% (minimum~~) plus the recommended additional flows from the latest climate change advice, to account for climate change and surcharging the drainage system, can be stored on the site without risk to people or property and without overflowing into a watercourse or adjacent areas. Where these surface water run-off limitations are likely to be exceeded development may be approved provided sufficient facilities for the long-term storage of surface water are installed within the development or a suitable location elsewhere. Long term surface water storage facilities must not cause detriment to existing heritage and environmental assets. For new development on greenfield sites, surface water flows arising from the development, once it is complete (and including any intermediate stages), shall be no higher than the existing rate prior to development taking place, unless it can be demonstrated that it is not reasonably practicable to achieve this. Sustainable Drainage System (SuDS) methods of source control and water quality improvement should be utilised for all new development, to minimise the risk of pollution and to attenuate flood volumes. Such facilities should be provided on-site, or where this is not possible, close to the site. Where new development is proposed within or adjacent to built-up areas it should be demonstrated that retrofitting existing surface water drainage systems, in those areas for flood prevention, and SuDS within the existing built environment have been explored. Any retrofitting proposals must not damage existing environmental assets including but not limited to landscapes, trees and hedgerows and agricultural land. Where possible SuDs approaches should be used to enhance and support the environmental aspects of the development.	

Policy/Paragraph	Modification proposed	Reason
	In exceptional circumstances, where SuDS methods of source control and water quality can not be provided, it must be demonstrated that: i it is not possible to incorporate SuDS, either on site, or close to the site; and ii an acceptable means of surface water disposal is provided which does not increase the risk of flooding, does not damage existing environmental assets and improves on the current situation. Measures to restrict surface water run-off rates shall be designed and implemented to prevent an unacceptable risk to contamination of groundwater. The type of SuDS used should be appropriate to the site in question and should ensure that there is no pollution of the water environment including both ground and surface waters. New development will not be permitted to allow ground water and/or the outflow from land drainage to enter public sewers. Existing land drainage systems should not suffer any detriment as a result of development.	
Para 12.8	The current City of York Strategic Flood Risk Assessment (2013) (SFRA) seeks to restrict surface water runoff from new development to below the extant run-off rates. Further details of how to calculate existing runoff rates are contained in the SFRA and the emerging City of York Council Sustainable Drainage Guidance for Developers. The latest Defra climate change allowance guidance requires developers to assess the life of the development and its vulnerability over this time, developments in York will be required to provide between 15 and 50% increase in flood flows based on the likely climate change uplifts for the Humber River Basin District. Support is available in the Strategic Flood Risk Assessment and the emerging City of York Council Sustainable Drainage Guidance for Developers document in the interpretation of national climate change guidance.	To provide an update.
Para 12.9	Examples of SuDs are included in the emerging Sustainable Drainage Guidance for Developers document which links to wider guidance including: ~~Sustainable Drainage Systems guidelines include:~~	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	• SUDS Manual (CIRIA C697). • Non-Statutory Technical Standards for Sustainable Drainage Systems (Defra March 2015). • Non-Statutory Technical Standards for Sustainable Drainage: Practice Guidance (The Local Authority SuDS Officer Organisation) • ~~National Standards for sustainable drainage systems: Designing, constructing, operating and maintaining drainage for surface runoff, Defra, December 2011.~~	
New paragraph	Consent may be required for drainage connections to Internal Drainage Board (IDB) managed watercourses under the terms of their byelaws, further information can be found on the York Consortium of Drainage Boards and the Kyle and Upper Ouse IDB websites.	To add clarity.
Section 13: Waste and Minerals		
Para 13.1	City of York is making good progress in sustainable waste management. The Council's waste management strategy is to reduce waste going to landfill through various initiatives such as the provision of a full kerbside recycling service. The tonnage disposed to landfill has fallen consistently in recent years, and the recycling rate has increased. Other waste streams generated in City of York are commercial and industrial waste; construction, demolition and excavation waste; agricultural waste; hazardous waste; low-level non-nuclear radioactive waste; and waste water/sewage sludge. Whilst there are currently no active mineral workings in City of York, there is existing ancillary minerals related infrastructure. ~~but~~ There are also resources of sand and gravel, brick clay, coal~~, oil and gas~~ hydrocarbons and coal-bed methane. Whilst these minerals are known to exist, it is not known whether they could be extracted economically and there has been ~~no~~ little interest expressed by the minerals industry in working them during the preparation of the Minerals and Waste Joint Plan or the City of York Local Plan.	To add clarity.
Policy WM1: Sustainable Waste Management	Sustainable waste management will be promoted by encouraging waste prevention, reuse, recycling, composting and energy recovery in accordance with the Waste Hierarchy and effectively managing all of York's waste streams and their associated waste arisings. This will be achieved in the following ways: i. working jointly with North Yorkshire County Council to develop capacity to manage	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	residual municipal waste through mechanical treatment, anaerobic digestion and energy from waste; ii. safeguarding existing facilities as ~~shown on the key diagram and the proposals map including Harewood Whin landfill and recycling and the household waste recycling centres at Hazel Court and Towthorpe~~ as identified in the Minerals and Waste Joint Plan; iii. identifying through the ~~Joint North Yorkshire, City of York and North York Moors~~ Minerals and Waste Joint Plan, suitable alternative capacity for municipal waste and suitable capacity for all other waste streams, as may be required during the lifetime of the Joint Plan until 2030. ~~plan. Priority in identifying facilities in the City of York area will be given to:~~ • ~~existing waste sites;~~ • ~~established and proposed industrial estates, particularly where there is the opportunity to co-locate with complementary activities, reflecting the concept of 'resource recovery parks';~~ • ~~previously developed land; and~~ • ~~redundant agricultural and forestry buildings including their curtilages, if suitably accessible for purpose.~~ iv. requiring the integration of facilities for waste prevention, re-use, recycling, composting and recovery in association with the planning, construction and occupation of new development for housing, retail and other commercial sites; v. promoting opportunities for on-site management of waste where it arises at retail, industrial and commercial locations, particularly in the main urban area; and; vi granting planning permissions for waste facilities in appropriate sustainable locations only where they would not give rise to significant adverse impacts on the amenity of local communities and the historic and natural environment, in accordance with other relevant policies in the plan.	
Para 13.2	Waste was formerly viewed as a by-product of living and was disposed of by the cheapest possible method, direct to landfill without pre-treatment. In the drive to achieve sustainable	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	waste management this is no longer possible. It is essential that greater emphasis is placed on avoiding waste production and managing the waste produced in the most sustainable way, making use of waste as a resource and only disposing of the residue that has no current value. National legislation, fiscal and policy measures have all contributed to driving waste up the waste hierarchy which aims first to reduce the generation of waste, followed by reuse, recycling and energy recovery~~. Waste should only be disposed to landfill if none of these options are viable.~~	
Para 13.3	For municipal waste City of York Council works closely with North Yorkshire County Council through an Inter-Authority Agreement. The councils ~~are currently working~~ have worked jointly to secure a waste treatment facility to divert biodegradable municipal waste from landfill. ~~The preferred bidder for the contract to design, build manage and operate the new facility is AmeyCespa~~. ~~North Yorkshire County Council has granted planning permission for a new mechanical treatment, anaerobic digestor, energy from waste and incinerator bottom ash plant at the Allerton aggregates quarry and landfill site~~ The facility at Allerton Waste Recovery Park (AWRP) at Allerton Park near Knaresborough is at an advanced stage of construction and is expected to be fully commissioned in early 2018.The new facility would reduce the amount of residual municipal waste going to landfill by ~~over~~ a minimum of 90~~0~~5%. ~~If this facility is delivered~~ Following the completion of the AWRP no other sites will be required for the treatment of residual municipal waste arising in the City of York Council area in the plan period.	To provide an update.
Para 13.4	~~It is likely, however that other facilities including waste transfer stations, material recycling stations and composting sites will be required in the City of York area. Yorwaste have submitted a planning application to expand the waste facilities at their Harewood Whin site. A decision on this application is expected later in 2014. This site contains the only landfill site within the City of York area and has planning permission until 2017 to accept up to 300,000 tonnes of waste per annum. However, reduced waste volumes are being disposed of to landfill, which may allow the planning permission for the site to be extended beyond 2017. The Council also operates two household waste recycling centres at Hazel court and Towthorpe. These and the Harewood Whin site will be safeguarded during the plan period.~~	To provide an update.
Para 13.5	The ~~Joint~~ Minerals and Waste Joint Plan, once finalised, will identify suitable alternative	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	capacity for municipal waste and suitable capacity for all other waste streams, as may be required during the lifetime of the Joint Plan. The priority to be given to the range of possible sites is set out in the ~~policy~~ Joint Plan. From a strategic viewpoint it will also be important that facilities for waste prevention, re-use, recycling, composting and recovery are integrated in association with the planning, construction and occupation of new development for housing, retail and other commercial sites. Similarly it is vital in the interests of sustainable development that opportunities for on-site management of waste where it arises at retail, industrial and commercial locations, particularly in the main urban area, are promoted.	
Policy WM2: Sustainable Minerals Management	Mineral resources will be safeguarded, the consumption of non-renewable mineral resources will be reduced by encouraging re-use and recycling of construction and demolition waste and any new provision of mineral resource will be carefully controlled. This will be achieved in the following ways: i. minimising the consumption of non-renewable mineral resources in major developments by requiring developers to demonstrate good practice in the use, reuse, recycling and disposal of construction materials; ii. identifying~~, if appropriate~~, through the ~~Joint North Yorkshire, City of York and North York Moors Waste and~~ Minerals and Waste Joint Plan, ~~Mineral Safeguarding Areas and policies to avoid sterilisation of resource by non-mineral development;~~ resources to be safeguarded, safeguarded areas for minerals and ancillary transport infrastructure including sites in the City of York area; and iii. ~~safeguarding, if appropriate, through the Joint North Yorkshire, City of York North Yorkshire and North York Moors Waste and Minerals Plan, strategic facilities for the storage, handling, processing and bulk transport of primary minerals and secondary and recycled materials; and~~ iv. identifying~~, if a proven need exists~~, through the ~~Joint North Yorkshire, City of York and North York Moors~~ Minerals and Waste Joint Plan, areas of sufficient quality for mineral extraction, in line with any agreed apportionments and guidelines. ~~The allocation of any future areas sites in the City of York for mineral extraction will only be considered and any planning applications will only be permitted where it is ensured that:~~	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	• ~~York's heritage and environmental assets are conserved and enhanced;~~ • ~~sites are accessible to sustainable modes of transport;~~ • ~~unacceptable levels of congestion, pollution and/or air and water quality are prevented;~~ • ~~flood risk is not increased and is appropriately managed;~~ • ~~proposals do not result in unacceptable adverse impacts on the historic or natural environment or the amenities of occupiers and users of nearby dwellings and buildings or on existing utilities within the site;~~ • ~~it is ensured that once extraction has ceased, high standards of restoration and beneficial after-uses of the site are achieved; and~~ • ~~there are no significant climate change impacts~~	
Para 13.8	~~This can be adopted by adopting a hierarchical approach to minerals supply which aims firstly to reduce as far as practicable the quantity of material used and waste generated, then to use as much recycled and secondary material as possible, before finally securing the remainder of material needed through new primary extraction.~~	To add clarity.
Para 13.9	Mineral Safeguarding Areas are areas of known mineral resources that are of sufficient economic or conservation value to warrant protection for generations to come. The ~~Joint North Yorkshire, City of York and North York Moors~~ Minerals and Waste Joint Plan will identify Mineral Safeguarding Areas and set out policies to avoid sterilisation of such resources by non-mineral development. Similarly the Joint Plan will safeguard any facilities required for the storage, handling, processing and bulk transport of primary minerals and secondary and recycled materials, in line with the NPPF.	To add clarity
Para 13.10	There are no existing mineral sites in York. The Local Aggregates Assessment has not presented specific evidence on aggregate mineral requirements for the York area. Sand and Gravel Assessments were carried out in City of York area in 2013 and 2014 which concluded that the City of York has sand and gravel resources however they are highly variable in terms of their aggregate properties. ~~Furthermore there has been no recent interest expressed in the exploration or development of mineral resources in York. However, the Joint North Yorkshire, City of York and North York Moors Minerals and Waste Local Plan will examine the need for any provision in detail and any allocation of~~	To add clarity

Policy/Paragraph	Modification proposed	Reason
	~~future sites or areas will only be considered and any planning applications will only be permitted where they meet the criteria set out in the policy.~~	
Section 14: Transport and Communications		
Para 14.9	The requirement to ensure the provision of public transport services from first occupation of the development for a period of up to 10 years, or five years after last occupation, whichever comes sooner, shall apply unless the developer can demonstrate this is not a viable option in terms of practicality and cost. In such cases the developer should set-out the proposed level of public transport provision and the duration of this provision, together with a justification for this.	To add clarity.
Para 14.15	Lack of sufficient safe, covered and convenient storage space for cycles in new development, particularly in residential development, can deter people from owning and using a cycle. Development will be expected to be in accordance with the advice given in the latest version of the Council's Cycle Parking Guidance.	To add clarity.
Policy T3: York Railway Station and Associated Operational Facilities	The Plan will support development that: i. Enhances the Listed Grade II* station and its setting that conserve and enhance its historic and natural environment, particularly those that improve the visual amenity at the station and its environs, to meet the demands of the modern rail customer; ii. increases the railway capacity at York Station (as identified on the Proposals Map) to meet changing demands on and capacity in the rail network, over the duration of the Local Plan period and beyond, and to develop the station as: • a hub and gateway station for York and the wider sub-region, and • a hub station for high-speed rail; iii. assists in the delivery of short-term public transport interchange improvements at the station in the short-to–medium-term; iv assists in the provision of a new public transport turn around and interchange facility as part of a general package of measures to improve access at York Station, by all modes, in the medium-to-long-term; v. consolidates public car parks and maintain an appropriate level of long-stay and short	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	stay parking at the York Station, which is currently provided at several locations; vi. improves pedestrian access to within and through the station, including, but not limited to: • links to the new interchange with further links from this to the south-western quadrant of the city centre; • links to the York Central site through the station (including pedestrian crossings of the lines); • links between the York Central site and the north-west quadrant of the city centre; • reduced pedestrian / vehicular conflict in Queen Street; • creation of public space at Tea Room Square; • improved way-finding and signage, and vii. safeguards land within the York Central site, or in the operational railway land, or adjacent to the York Central site, for expanding the Siemens Trans Pennine Express depot.	
Para 14.29	By virtue of its short journey time to London via the East Coast Main Line, and easy interchange between King's Cross and St. Pancras, York is also well connected to mainland Europe by rail. The rail link to Manchester Airport enables it to also be linked to longer distance international travel by air. The importance of York's position on the rail network is evidenced by annual passenger flows of nearly 1.29 million between York and London and over 1.~~1~~35 million between York and Leeds.	To provide an update.
Para 14.31	Network Rail's 'Yorkshire and Humber Route Utilisation Strategy (RUS), 2009' forecast the future passenger demand levels and overall growth levels for the key markets. It predicted that the total number of passengers travelling to York will increase by 41% over the next 12 years (from 2009). However, since the publication of this RUS, Network Rail, working with the rail industry and wider stakeholders and partners, is required to plan for future use of and investment in the railway as part of the regulated Long Term Planning Process. The relevant workstreams in this case are the rail industry Market Studies (published in October 2013), and the East Coast Route Study. The market studies determine the required railway outputs (frequency, journey time, capacity, punctuality etc.) between	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	centres to support broader Governmental objectives. The route study, due to be issued for consultation in 2017, will consider and propose the rail investments required to help deliver those outputs.	
Para 14.32	The national government has determined that the necessary capacity and quality improvements for future long distance north/south movements will be provided by a new high speed rail system, HS2. The proposed network would be Y-shaped up to Leeds and Manchester with onward links to the existing East and West Coast mainlines. When complete in 2033 it will provide a much faster connection to London and the continent for travellers from the Leeds City Region and the north of England. York will have a direct link with the new high speed line and sufficient capacity is required at the station to accommodate HS2 trains calling at it. Prior to the implementation of HS2, the Intercity Express Programme (to replace ageing Inter-City 125 HST train sets on the East Coast Main Line) is expected to start in 2018. Futhermore, in the 2016 Budget the Chancellor of the Exchequer announced the Government will allocate £60 million to develop options for High Speed 3 between Leeds and Manchester, as well as options for improving other major city rail links.	To provide an update.
Para 14.38	A Siemens Transpennine Express depot is currently located within the existing operational railway land to the north of Leeman Road and north-west of York Station (i.e. within the York Central site, see Policy SS9). The electrification of the Trans-Pennine Line, which is expected to be completed by ~~2018~~ 2022, could result in more rolling stock being maintained at the depot, and may require it to be expanded and relocated.	To provide an update.
Para 14.54	~~The Reinvigorate York initiative indentifies schemes for turning Fossgate into a footstreet and intermediate improvements for Micklegate. Development that facilitates vehicular access restrictions or changes to carriageway widths, alignments and surfacing materials, junction layouts, footway widths and materials and hard / soft landscaping can provide a positive contribution to these schemes.~~ The Council allocated funding in 2017/18 to investigate potential changes to the traffic restrictions on Fossgate to be investigated. This may lead to improvements to the physical environment in Fossgate. Development that facilitates vehicular access restrictions or changes to carriageway widths, alignments and surfacing materials, junction layouts, footway widths and materials and hard / soft landscaping can provide a positive	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	contribution to this, and to other schemes.	
Para 14.58	The coverage and content of a TS, TA or TP will vary significantly depending on the size and type of development they are required to support. Guidance thresholds for the preparation of a TS TA or TP was contained in the Department for Communities and Local Government's / Department for Transport's 'Guidance on Transport Assessment' (2007). Although this guidance was withdrawn in October 2014, the Council considers that it is, in the absence of any other national or local guidance, still relevant and appropriate. The Council shall, therefore, use it as a basis for determining whether it will require the preparation of a TS, TA or TP to support a development proposal and agreeing the scope of the resultant TS, TA or TP. In addition, the Council reserves the right to request a TS, TA or TP in other instances, where the location and/or the nature of the development are considered to be particularly sensitive. In some cases where developments are in close proximity, a joint master travel management plan may be required.	To provide an update.
Policy T9: Freight Consolidation	**Policy T9: ~~Freight Consolidation~~ Alternative-fuel fuelling stations and freight consolidation centres** The Plan will support the development of ~~a Compressed Natural Gas~~ alternative-fuel (for example, compressed natural gas (CNG)) fuelling stations and Use Class B8 f~~F~~reight c~~C~~onsolidation c~~C~~entres (FCCs), ~~at FC1: North of Mill Lane/West of A1237, Askham Bryan, as shown on the Proposals Map.~~ ~~The plan may also support proposals for other Freight Consolidation Centres,~~ subject to the proposals being in compliance with the other policies in the plan and the provision of: i.. a suitable evidence base (business plan) to demonstrate the financial viability of the proposal over the plan period; ii. a transport assessment demonstrating that: a. the implications of traffic distribution arising from the transfer of traffic or vehicles to particular routes does not generate detrimental impacts that it is not feasible to mitigate; and	To reflect that site FC1 is no longer proposed to be allocated for this use.

Policy/Paragraph	Modification proposed	Reason
	b. impacts on the local and strategic highway network are manageable and can be mitigated; iii. an evidence base to substantiate anticipated reductions in freight (and emissions), particularly in the city centre; iv. traffic management proposals that are achievable and 'lock-in' the anticipated benefits; and v. a travel plan demonstrating realistic opportunities for journeys to work being undertaken by more sustainable modes of transport.	
Para 14.65	~~The development of a Compressed Natural Gas (CNG) fuelling station and Use Class B8 Freight Consolidation Centre at FC1: North of Mill Lane/West of A1237, Askham Bryan will provide the main opportunity to deliver these two Low Emission Strategy measures.~~	To reflect that site FC1 is no longer proposed to be allocated for this use.
Policy CI1: Communications Infrastructure	Proposals for high quality communications infrastructure will be supported where: i. mobile communications infrastructure is located at an existing mast or transmission site, where it is technically and operationally feasible, unless it is particularly visually intrusive and is available for use as a shared facility; ii. the development is of an appropriate scale and design and it is sited and designed to not have any adverse impact on residential amenity of people and properties and minimise its impact on visual amenity; iii. it will be available for use as a shared facility where possible; and iv. there are no significant or demonstrable adverse impacts that outweigh the benefits of the scheme, particularly in areas of sensitivity including the Green Belt, strays, green wedges, sites of nature conservation value, conservation areas, listed buildings and their setting, <u>areas containing or in proximity to a heritage asset (including non-designated heritage assets),</u> and areas of high visual amenity including protecting key views. <u>Where new equipment is proposed which cannot be located on an existing mast or site at</u>	To add clarity.

Policy/Paragraph	Modification proposed	Reason
	its preferred location due to technical and operational constraints, operators will be required to provide evidence that they have explored the possibility of utilising alternative existing sites. This is of particular importance where the site falls within an area of sensitivity, such as the Green Belt strays, green wedges, sites of nature conservation value, conservation areas, listed buildings and their setting and areas of visual importance including key views. For sites that fall within an area of sensitivity a feasibility study should be submitted, carried out by a suitably qualified and independent professional, to justify the provision and location of the new facility. When undertaking such a feasibility study, a clear understanding of the significance of a heritage asset (including non-designated heritage assets) and its setting is necessary to develop proposals which avoid or minimise harm. In the interest of visual amenity and improvements to public realm, consideration should be given to the removal of communications infrastructure, including street facilities (equipment cabinets etc), when it ceases to be of operational benefit. In particular the Council will seek the removal and relocation of any visually intrusive masts particularly in the city centre, as and when the opportunity arises. A planning condition should be used to implement the removal of redundant masts where appropriate. Proposals will be approved wherever possible unless the adverse impacts on the special character of York significantly and demonstrably outweigh the benefits. Where proposals fall under permitted developments rights, operators are encouraged to notify the Council of any communications infrastructure installations, such as mobile phone antennas.	
Para 14.69	~~With the development of new and advanced services the demand for new infrastructure is continuing to grow~~. Demand for digital services and applications will continue to rise rapidly, with a consequent acceleration in the amount of data being carried over networks. To support this demand, the UK needs infrastructure that is high capacity, reliable, resilient, secure, affordable and fast. For example, York is the first UK city to get 1000Mb UltraFibreOptic broadband connectivity.	To provide an update.
New paragraphs	The provision of and access to ultrafast and future-proof connectivity is now an essential,	To provide an

Policy/Paragraph	Modification proposed	Reason
	and a key enabler for the UK's Industrial Strategy, that is being supported by the Department for Culture, Media & Sport's (DCMS) full fibre city programme and other initiatives. Future development provides an ideal opportunity for the Council and other organisations to expand and continue the development of York's world-class ultrafast connectivity - both fixed and wireless - and it is vital to offer high-speed internet access as York continues to be promoted as a vanguard 'Digital City'. York must also address the growing need for high speed connectivity on the City's transport network. The coming challenge of technologies including enhanced data services, connected and autonomous vehicles and Mobility as a Service, places a requirement on the Council as Highway Authority to accommodate them and maximise the benefits their operation can offer to the City. York intends to retain its position as a leader in this area by ensuring appropriate data connectivity is available throughout the existing road network and is included where new roads and transport infrastructure are provided. This includes the use of ducting, street furniture and on-premise masts. In England, in 2013, changes were introduced to the Electronic Communications Code, through section 9 of the Growth and Infrastructure Act, to support the rollout of fixed broadband in all areas, apart from Sites of Special Scientific Interest. The Act introduced the need to promote economic growth when making changes to the Code. Secondary legislation (The Electronic Communications Code (Conditions and Restrictions) (Amendment) Regulations amended the Code to allow "a more permissive regime" for installation of above ground fixed-line broadband electronic communications apparatus. This secondary legislation also removed the requirement for prior approval by planning authorities for broadband cabinets and poles in protected areas. This change grants planning permission through permitted development rights for the installation of: broadband street cabinets, telegraph poles and overhead lines, which can now be installed (effectively removing the requirement to underground new telecommunications cables) in any location other than Sites of Special Scientific Interest. These amendments to the Code were given a sunset clause of five years, and will expire in April 2018. They are designed to help speed up the deployment of superfast broadband	update.

Policy/Paragraph	Modification proposed	Reason
	and reduce uncertainty and delays for communications providers. Also in 2013 further changes to planning in England were made to support 4G rollout in non-protected areas including extending and widening existing masts, permitting larger and taller antennas and small cell antennas. Specific changes for protected areas saw the addition of an allowance of three antennas to masts and dish antennas to existing masts, as well as small cell antennas. In addition, Electronic Communications Code operators published, in 2013, in partnership with government organisations and other interested parties, two codes of best siting practice to complement the statutory changes.	
Para 14.71	~~Where new equipment is proposed, which cannot be located on an existing mast or site, at its preferred location, due to technical and operational constraints, operators will be required to provide evidence that they have explored the possibility of utilising alternative existing sites. This is of particularly importance where the site falls within an area of sensitivity, such as the Green Belt strays, green wedges, sites of nature conservation value, conservation areas, listed buildings and their setting and areas of visual importance including key views, where developers will be requested to submit a feasibility study, carried out by a suitably qualified and independent professional, to justify the provision and location of the new facility. Proposals will be approved wherever possible unless the adverse impacts on the special character of York significantly and demonstrably outweigh the benefits.~~	Updated by additions to Policy CI1.
Para 14.72	Planning obligations may be used to ensure that new sites are available for future mast sharing subject to technical and operational constraints. Reforms to the Electronic Communications Code, made through the Digital Economy Bill, will further encourage an efficient use of infrastructure by promoting site sharing. The rapid pace of technological change within the industry means that fewer installations may be required in the future and so it is important that redundant installations are removed and the site fully restored (including aftercare). Such obligations may also be used to require the expeditious removal of equipment and installations once they cease to be operational. In particular the Council will seek the removal of the visually intrusive masts in the City Centre, such as those masts on the BT Hungate and Cedar Court Hotel buildings as when the opportunity arises. These masts currently have a detrimental visual impact on the York Central Historic	To provide an update.

Policy/Paragraph	Modification proposed	Reason
	Core Conservation Area and former North East Railway Headquarters which is a Grade II* Listed Building.	

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Annex 8

CITY OF YORK
Gypsy, traveller and Travelling Showpeople Needs Assessment (ORS)

Opinion Research Services

Excellent research for the public, voluntary and private sectors

City of York

Gypsy and Traveller Accommodation Assessment Update

Final Report

June 2017

Opinion Research Services The Strand, Swansea SA1 1AF
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1. Executive Summary

Introduction and Methodology

1.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in York.

1.2 As well as updating previous GTAAs, another key reason for completing the study was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes. The key change that was made was the removal of the term *persons…who have ceased to travel permanently,* meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA (see Paragraph 2.7 for the full definition).

1.3 The GTAA provides a robust and credible evidence base which can be used to aid the implementation of Development Plan policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the period up to 2032. The outcomes of this study supersede the outcomes of any previous GTAAs completed in York.

1.4 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in York through a combination of desk-based research and engagement with members of the travelling community living on all known sites. A total of 51 interviews were completed with members of the travelling community living on sites and yards. This represents a response rate of 71%. The Council and ORS also worked closely with the York Travellers Trust to identify Gypsy and Traveller households living in bricks and mortar. This resulted in a total of 3 valid interviews (a fourth interview was completed with a doubled-up household living on one of the public sites who are seeking to move to bricks and mortar).

1.5 The fieldwork for the study was completed between February 2016 and May 2017, which was after the publication of PPTS (2015). As a result of this change questions to enable the determination of the planning status of households were included in the household interviews.

1.6 The baseline date for the study is **April 2016** which is when the majority of the interviews were completed.

Key Findings

Additional Pitch Needs – Gypsies and Travellers

1.7 Overall the additional pitch needs for Gypsies and Travellers from 2016-2032 are set out below. Additional needs are set out for those households that meet the planning definition of a Gypsy or Traveller, for those unknown households where an interview was not able to be completed (either due to households refusing to be interviewed, or not being present despite up to 3 visits to each site) who may meet the planning definition, and for those households that do not meet the planning definition (even though it is not now a requirement to include these households in a GTAA).

1.8 Only the need from those households who meet the planning definition and from those of the unknown households who subsequently demonstrate that they meet it should be formally considered as need arising from the GTAA.

1.9 The need arising from households that meet the planning definition should be addressed through site allocation/intensification/expansion policies.

1.10 The Council will need to carefully consider how to address the needs associated with unknown Travellers as it is unlikely that all of this need will need to be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan policies the Council could consider the use of a criteria-based policy (as suggested in PPTS) for any unknown households that do provide evidence that they meet the planning definition. Based on national evidence from over 1,800 household interviews that have been completed by ORS with Gypsies and Travellers since the changes to PPTS in 2015 it has been assumed that 10% of the unknown households will subsequently meet the planning definition.

1.11 The remaining need from households that do not meet the planning definition will need to be addressed through other means including a Strategic Housing Market Assessment (SHMA) or Housing and Economic Development Needs Assessment (HEDNA).

1.12 For those living on existing sites in York there were 9 Gypsy or Traveller households identified that meet the planning definition, 21 unknown households that may meet the planning definition and 40 households that do not meet the planning definition. For those living in bricks and mortar there was 1 household and some members of a second household that meet the planning definition and 1 household and some members of a second household that that do not meet the planning definition.

1.13 Need for **2 additional pitches** for households that meet the planning definition is made up of 3 from new household formation (using a growth rate of 1.80%), and 2 currently living in bricks and mortar, less a supply 3 pitches on public sites during the first 5 year period..

Figure 1 – Additional need for Gypsy and Traveller households in York that meet the Planning Definition (2016-2032)

Gypsies and Travellers – Meet Planning Definition	Pitches
Supply of Pitches	
Available vacant public and private pitches	0
Unimplemented pitches on new sites	0
Vacated by households moving to bricks and mortar	2
Out-migration	1
Total Supply	**3**
Current Need	

Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/doubling-up/over-crowding	0
Movement from bricks and mortar	2
Households on waiting lists for public sites	0
Total Current Need	**2**
Future Need	
Currently on sites with temporary planning permission	0
5 year need from older teenage children	0
In-migration	0
Net new household formation *(Household base 9 and formation rate 1.80%)*	3
Total Future Need	**3**
Net Pitch Need = (Current and Future Need – 5 Year Supply)	**2**

Figure 2 – Additional need for Gypsy and Traveller households in York that meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	0	**1**	**1**	**0**	**2**

1.14 Need for up to 12 additional pitches for unknown households is made up of 6 unauthorised pitches and new household formation of 6 from a maximum of 21 households. If the ORS national average[1] of 10% were applied this could result in a need for 1 additional pitch (rounded down from 1.2).

Figure 3 – Additional need for unknown Gypsy and Traveller households in York (2016-2032)

Gypsies and Travellers - Unknown	Pitches
Supply of Pitches	
Available vacant public and private pitches	0
Unimplemented pitches on new sites	0
Vacated by households moving to bricks and mortar	0
Out-migration	0
Total Supply	**0**
Current Need	
Households on unauthorised developments	6
Households on unauthorised encampments	0
Concealed households/doubling-up/over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	**6**
Future Need	
Currently on sites with temporary planning permission	0
5 year need from older teenage children	0
In-migration	0

[1] Based on the outcomes of over 1,800 interviews that have been completed by ORS with Gypsy and Traveller households since PPTS (2105) was issued.

Net new household formation *(Base number of households 21 and formation rate 1.50%)*	6
Total Future Need	**6**
Net Pitch Need = (Current and Future Need – Total Supply)	**12**

Figure 4 – Additional need for unknown households in York by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	7	**2**	**2**	**1**	**12**

1.15 For illustrative purposes only as it does not now need to be included in the GTAA - need for 33 additional pitches for households that do not meet the planning definition is made up of 6 from concealed households or adults, 6 from older teenage children in need of a pitch of their own in the next 5 years, 2 from bricks and mortar, and new household formation of 19 using a formation rate of 2.00% and a household base of 52 (40 current households, 6 concealed households or adults and 6 older teenage children).

Figure 5 – Additional need for Gypsy and Traveller households in York that do not meet the Planning Definition (2016-2032)

Gypsies and Travellers	Pitches
Supply of Pitches	
Available vacant public and private pitches	0
Unimplemented pitches on new sites	0
Vacated by households moving to bricks and mortar	0
Out-migration	0
Total Supply	**0**
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/doubling-up/over-crowding	6
Movement from bricks and mortar	2
Households on waiting lists for public sites	0
Total Current Need	**8**
Future Need	
Currently on sites with temporary planning permission	0
5 year need from older teenage children	6
In-migration	0
Net new household formation *(Base number of households 52 and formation rate 1.90%)*	19
Total Future Need	**25**
Net Pitch Need = (Current and Future Need – Total Supply)	**33**

Figure 6– Additional need for households in York that do not meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	19	**6**	**7**	**1**	**33**

Summary of Need for Gypsies and Travellers

1.16 The table below summarises the overall need for Gypsies and Travellers in York for the GTAA period to 2032 broken down by where this need should be addressed by the Council.

Figure 7– Summary of need for Gypsies and Travellers in York

Total Future Need	GTAA	SHMA/HEDNA	Total
Households that meet the Planning Definition (including 10% of unknown need)	3	0	**3**
Households that do not meet the Planning Definition (including 90% of unknown need)	0	44	**44**
TOTAL	**3**	**44**	**47**

1.17 The previous GTAA identified a need for 66 additional pitches over a similar 16 year period. The main differences between the 2 sets of outputs is that the 2014 study identified need of 10 additional pitches from households living in bricks and mortar and used a new household formation rate of 2.50% giving additional future need of 17 households. Levels of supply, unauthorised and concealed households are consistent in both studies.

Additional Plot Needs - Travelling Showpeople

1.18 Overall the additional plot needs for Travelling Showpeople from 2016 to 2032 are set out below. Additional needs are set out for those households that meet the planning definition of a Travelling Showperson, for those unknown households where an interview was not able to be completed (either due to households refusing to be interviewed, or not being present despite 3 visits to each site) who may meet the planning definition, and for those households that do not meet the planning definition.

1.19 Only the need from those households who meet the planning definition and from those of the unknown households who subsequently demonstrate that they meet it should be considered as need arising from the GTAA. Based on national evidence from over 300 household interviews that have been completed by ORS with Travelling Showpeople since the changes to PPTS in 2015 it has been assumed that 70% of the unknown households will subsequently meet the planning definition.

1.20 The need arising from households that meet the planning definition should be addressed in the Local Plan through standard site allocation/intensification/expansion policies, and the needs of the proportion of unknown households who may meet the planning definition should be addressed through the use of a criteria-based policy (as suggested in PPTS).

1.21 The need for those households who do not meet the planning definition will need to be addressed through other means such as the SHMA or HEDNA.

1.22 The study identified 1 small yard in York with 1 plot which has temporary planning permission. A total of 2 interviews were completed with households living on the yard - a family and a single elderly resident. Through a combination of the household interviews and details provided to the Council it has been confirmed that the household living on the plot have submitted the land as part of the Local Plan site identification process for a total of 3 plots – 2 for the current households and 1 for their young son in years 16 of the Plan. Therefore total need could increase by **3 additional plots**.

Figure 8 – Maximum additional need for Travelling Showpeople households in York that meet the Planning Definition (2016-2032)

Travelling Showpeople – Meet Planning Definition	Plots
Supply of Plots	
Additional supply from vacant public and private plots	0
Additional supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	**0**
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public yards	0
Total Current Need	**0**
Future Need	
Households on yards with temporary planning permission	2
5 year need from older teenage children	0
In-migration	0
New household formation *(Derived from site demographics)*	1
Total Future Needs	**3**
Net Plot Need = (Current and Future Need – Total Supply)	**3**

Figure 9 – Addition need for Travelling Showpeople households in York that meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	2	0	0	1	**3**

Transit Need

1.23 Information from the Council and from the Traveller Caravan Count has identified historic low numbers of encampments on land not owned by Travellers in York. Information was also provided to suggest that these encampments are transient and short-term in nature. In addition there is a private transit site in York with 18 transit pitches. At the time of the GTAA this was only occupied by 6 households.

1.24 It has been suggested that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling. This may well be the case but it will take some time for any changes to materialise. As such the use of historic evidence to make an assessment of future transit need is not recommended at this time. Any recommendation for future transit provision will need to make use of a robust post-PPTS 2015 evidence base and there has not been sufficient time yet for this to happen.

1.25 It is therefore recommended that the situation relating to levels of unauthorised encampments should be continually monitored whilst any potential changes associated with the new PPTS develop, and in the short-term the Councils should consider the use of short-term toleration or negotiated stopping agreements to

deal with any encampments. A review of the evidence base relating to unauthorised encampments should be undertaken in autumn 2018 once there is a new 3 year evidence base following the changes to PPTS in August 2015. This will establish whether there is a need for investment in more formal transit sites or emergency stopping places.

1.26 To deal with any unauthorised encampments in the interim period a management approach as opposed to an infrastructure solution is recommended through the use of tolerated or Negotiated Stopping Arrangements. In essence this means that the Council engage with households on unauthorised encampments to identify how long they are seeking to stay in the area and if it is found that the length of stay is estimated to be short, and if the site is acceptable for short-term occupation, an agreement is reached that they can stay where they are without enforcement actions for a set period of time provided they agree to abide by certain conditions such as not littering or causing noise nuisance etc. If they breach any conditions or overstay the agreed occupation period then enforcement action can be taken. This approach has been pioneered by Leeds Gate[2] in the North East of England.

[2] See www.leedsgate.co.uk for further information.

2. Background

2.1 The primary objective of the City of York Gypsy and Traveller Accommodation Assessment (GTAA) Update is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in York for the 16 year period to 2032. The primary reason for completing the Update was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes.

2.2 The study provides an evidence base to enable the Council to comply with its requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, the National Planning Policy Framework (NPPF) 2012, Planning Practice Guidance (PPG) 2014, and PPTS 2015, and the Housing and Planning Act 2016.

2.3 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller (and Travelling Showpeople) Accommodation Assessment (GTAA).

2.4 The outcomes of this Update supersede the outcomes of the York Gypsy, Roma, Traveller and Travelling Showpeople Accommodation Assessment that was published in April 2014. This identified a net need for 66 additional pitches for the period 2014-2030.

2.5 The baseline date for the study is **April 2016**.

Definitions

2.6 The current planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2015). The previous definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).

The Planning Definition in PPTS (2015)

2.7 For the purposes of the planning system, the definition of a Gypsy, Traveller or Travelling Showperson was changed in PPTS (2015). The planning definition is set out in Annex 1 of PPTS and states that:

> *For the purposes of this planning policy "gypsies and travellers" means:*
>
> *Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*
>
> *In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:*

a) Whether they previously led a nomadic habit of life.
b) The reasons for ceasing their nomadic habit of life.
c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

For the purposes of this planning policy, "travelling showpeople" means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

2.8 The key change that was made to both definitions was the removal of the term *persons…who have ceased to travel permanently,* meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

2.9 One of the most important questions that GTAAs will need to address in terms of applying the planning definition is *what constitutes travelling*? This has been determined through case law that has tested the meaning of the term '*nomadic*'.

2.10 **R v South Hams District Council (1994)** – defined Gypsies as "*persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)*" This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.

2.11 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.

2.12 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.

2.13 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the local authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

2.14 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to

abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.

2.15 **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.

2.16 The implication of these rulings in terms of applying the planning definition is that it will **only include those who travel (or have ceased to travel temporarily) for work purposes and in doing so stay away from their usual place of residence**. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work – such as visiting horse fairs and visiting friends or relatives. It will **not cover** those who commute to work daily from a permanent place of residence.

2.17 It will also be the case that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. the household unit would be defined as travelling under the planning definition.

2.18 Households will also fall under the planning definition if they can provide information that they have ceased to travel temporarily as a result of their own or their family's or dependants' educational or health needs or old age. In order to have ceased to travel temporarily these households will need to provide information that they have travelled in the past. In addition, households may also have to provide information that they plan to travel again in the future.

2.19 This approach was endorsed by a Planning Inspector in a recent Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267). A summary can be seen below:

> *Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose… This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work… Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment… I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.*

Legislation and Guidance for Gypsies and Travellers

2.20 Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- The Housing and Planning Act, 2016
- Planning Policy for Traveller Sites (PPTS), 2015

- National Planning Policy Framework (NPPF), 2012
- Planning Practice Guidance[3] (PPG), 2014

2.21 The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in PPTS (2015). It should be read in conjunction with the National Planning Policy Framework (NPPF). In addition the Housing and Planning Act (2016) makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

Planning Policy for Traveller Sites (PPTS) 2015

2.22 The revised PPTS, which came into force in August 2015, sets out the direction of Government policy. As well as introducing a revised planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- *Local planning authorities should make their own assessment of need for the purposes of planning.*
- *To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.*
- *To encourage local planning authorities to plan for sites over a reasonable timescale.*
- *That plan-making and decision-taking should protect Green Belt from inappropriate development.*
- *To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.*
- *That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.*
- *For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.*
- *To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.*
- *To reduce tensions between settled and Traveller communities in plan-making and planning decisions.*
- *To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure.*
- *For local planning authorities to have due regard to the protection of local amenity and local environment.*

2.23 In practice, the document states that (PPTS Paragraph 9):

- *Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.*

[3] With particular reference to the sections on Housing and Economic Development Needs Assessments

2.24 PPTS goes on to state (Paragraph 10) that in producing their Local Plan local planning authorities should:

- *Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.*
- *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.*
- *Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries).*
- *Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.*
- *Protect local amenity and environment.*

2.25 Local Authorities now have a duty to ensure a 5 year land supply to meet the identified needs for Traveller sites. However, PPTS also notes in Paragraph 11 that:

- *Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community.*

3. Methodology

3.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of the introduction of the PPG in 2014, changes to PPTS in August 2015 and the Housing and Planning Act (2016), as well as responding to recent changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.

3.2 PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit site accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople.

3.3 The approach currently used by ORS was considered in April 2016 by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy who concluded:

> *'The methodology behind this assessment included undertaking a full demographic study of all occupied pitches, interviewing Gypsy and Traveller households, including those living in bricks and mortar accommodation, and considering the implications of the new Government policy. On the evidence before me, I am satisfied that the assessment has been appropriately carried out, and there is no reason for me to dispute the figures.'*

3.4 The stages below provide a summary of the methodology that was used to complete this study.

Glossary of Terms

3.5 A Glossary of Terms can be found in **Appendix A**.

Desk-Based Review

3.6 ORS collated a range of secondary data that was used to support the study. This included:

- Census data.
- Caravan counts.
- Records of unauthorised sites/encampments.
- Information on planning applications/appeals.
- Information on enforcement actions.
- Existing Needs Assessments and other relevant local studies.
- Existing national and local policy, guidance and best practice.

Stakeholder Engagement

3.7 As this report is a re-assessment of a recent study no further stakeholder interviews were completed at this time.

Working Collaboratively with Neighbouring Planning Authorities

3.8 Being a re-assessment of a recent study no additional interviews with neighbouring authorities were completed – although ORS have completed studies in the following nearby areas since the PPTS (2015) was published and the outcomes of these studies have been considered as evidence to support this update where appropriate:

- Hambleton
- Selby

3.9 It is understood that the Council is currently actively involved in collaborating with all its neighbouring authorities across a range of Local Plan issues.

Survey of Travelling Communities

3.10 ORS sought to identify all pitches on authorised and unauthorised sites in York and worked closely with the Council to ensure that the Site Record Form would collect all the necessary information to support the study. This form has been updated to take account of changes to PPTS (2015) to collect the information ORS feel is necessary to apply the planning definition for a household.

3.11 ORS sought to undertake a full demographic study of all occupied pitches as our experience suggests that a sample based approach very often leads to an under-estimate of current and future needs which can be the subject of challenge at subsequent appeals and examinations. All occupied pitches were visited by experienced ORS researchers who conducted interviews with as many residents as possible to determine their current demographic characteristics, whether they have any current or future accommodation needs and how these may be addressed, whether there are any concealed households or doubling-up, and their travelling characteristics (to meet the requirements in PPTS). Staff also sought to identify contacts living in bricks and mortar to interview. In addition to the information from the household interviews that has been used to estimate current and future accommodation needs a breakdown of responses to the additional questions that were asked can be found in **Appendix B**. The household interview questions can be found in **Appendix C**.

3.12 Fieldwork was undertaken between February 2016 and May 2017 and a total of 51 interviews were completed with Gypsy, Traveller and Travelling Showperson households living on 7 public, private and unauthorised sites and yards. Information about travelling was collected in all of the 51 household interviews. Whilst it was not possible to complete an interview on a number of sites or pitches for reasons including refusal to be interviewed or the household not being in, basic details were collected for these pitches.

Engagement with Bricks and Mortar Households

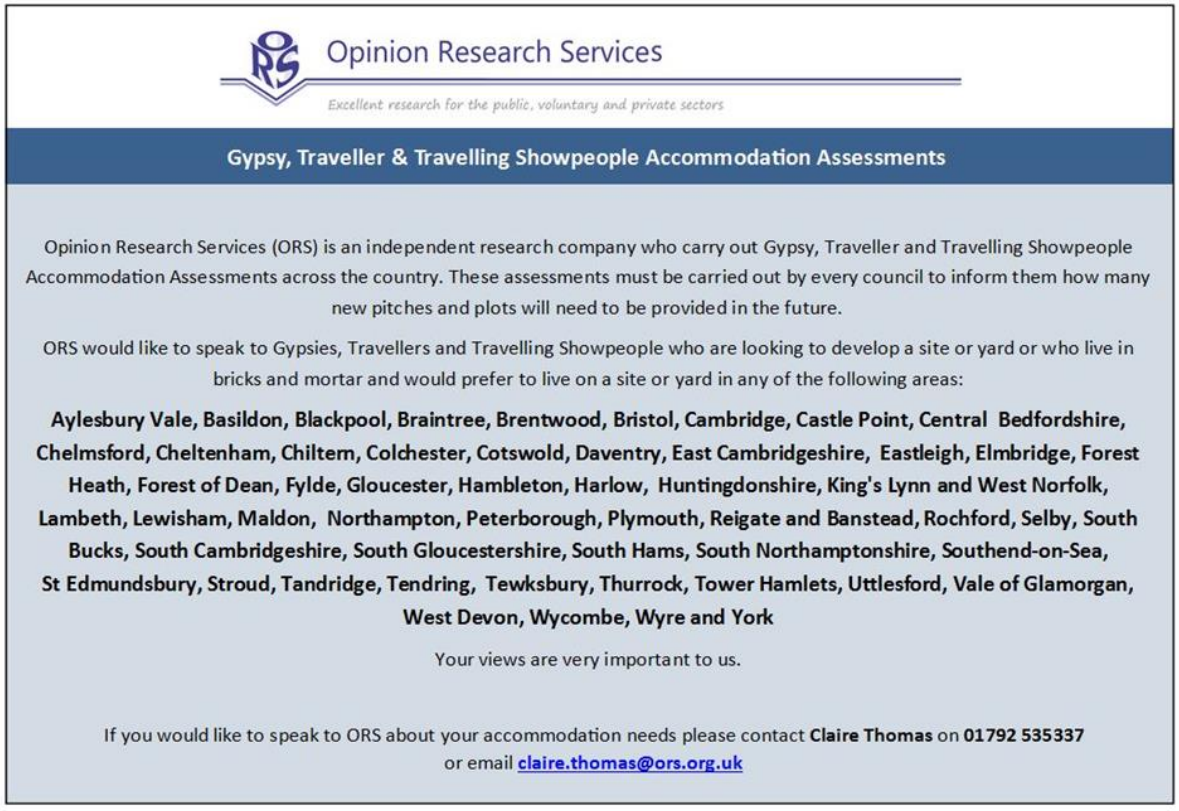
3.13 Many Planning Inspectors and Appellants at planning appeals question the accuracy of GTAA assessments in relation to Gypsies and Traveller households living in bricks and mortar accommodation who may wish to move on to a site. ORS feel that the only practical approach is to take all possible measures to identify as many households in bricks and mortar who may want to take part in an interview to determine their future accommodation needs, including a wish to move to a permanent pitch in the study area.

3.14 The 2011 Census recorded a total of 66 Gypsy or Irish Traveller households living in a house or a flat in York. Contacts in bricks and mortar were sought through a wide range of sources including speaking with people living on the existing site to identify any friends or family living in bricks and mortar who may wish to move to a site, and intelligence from the Council and the York Travellers Trust.

3.15 In addition adverts were placed in Worlds Fair, Travellers Times and on the Friends, Families and Travellers Facebook pages. Examples can be seen below.

3.16 Contacts that were identified were followed-up with a telephone call to request an opportunity for a short interview to identify any accommodation needs.

Figure 10 – Bricks and Mortar Adverts



Opinion Research Services

Excellent research for the public, voluntary and private sectors

Gypsy, Traveller & Travelling Showpeople Accommodation Assessments

Opinion Research Services (ORS) is an independent research company who carry out Gypsy, Traveller and Travelling Showpeople Accommodation Assessments across the country. These assessments must be carried out by every council to inform them how many new pitches and plots will need to be provided in the future.

ORS would like to speak to Gypsies, Travellers and Travelling Showpeople who are looking to develop a site or yard or who live in bricks and mortar and would prefer to live on a site or yard in any of the following areas:

Aylesbury Vale, Basildon, Blackpool, Braintree, Brentwood, Bristol, Cambridge, Castle Point, Central Bedfordshire, Chelmsford, Cheltenham, Chiltern, Colchester, Cotswold, Daventry, East Cambridgeshire, Eastleigh, Elmbridge, Forest Heath, Forest of Dean, Fylde, Gloucester, Hambleton, Harlow, Huntingdonshire, King's Lynn and West Norfolk, Lambeth, Lewisham, Maldon, Northampton, Peterborough, Plymouth, Reigate and Banstead, Rochford, Selby, South Bucks, South Cambridgeshire, South Gloucestershire, South Hams, South Northamptonshire, Southend-on-Sea, St Edmundsbury, Stroud, Tandridge, Tendring, Tewksbury, Thurrock, Tower Hamlets, Uttlesford, Vale of Glamorgan, West Devon, Wycombe, Wyre and York

Your views are very important to us.

If you would like to speak to ORS about your accommodation needs please contact **Claire Thomas** on **01792 535337** or email **claire.thomas@ors.org.uk**

Friends, Families and Travellers
4 mins ·

Opinion Research Services (ORS) is an independent research company who carry out Gypsy, Traveller and Travelling Showpeople Accommodation Assessments across the country. These assessments must be carried out by every council to inform them how many new pitches and plots will need to be provided in the future.
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Northampton, Peterborough, Plymouth, Reigate and Banstead, Rochford, Selby, South Bucks, South Cambridgeshire, South Gloucestershire, South Hams, South Northamptonshire, Southend-on-Sea, St Edmundsbury, Stroud, Tandridge, Tower Hamlets, Tendring, Tewkesbury, Thurrock, Tower Hamlets, Uttlesford, West Devon, West Oxfordshire, Wycombe, Wyre and York.
Your views are very important to us.
If you would like to speak to ORS about your accommodation needs please contact Claire Thomas on 01792 535337
or email claire.thomas@ors.org.uk

Like Comment Share

Talk to us about your housing needs

City of York Council is updating its understanding of the accommodation needs of the Travelling Community in its area.

The Council has asked Opinion Research Services (ORS) who are an independent research company to look at what accommodation *there is currently for Gypsies and Travellers and whether there is enough.*

ORS would like to speak to Gypsies, Travellers and Showpeople who live in a house in **York (see map)** and would prefer to live on a site or yard.

How you can get involved

You can take part in a short confidential telephone interview by contacting **Claire Thomas:**

Call: 01792 535337

Email: claire.thomas@ors.org.uk

Text: 07730 565962

The closing date to take part in the study is
Friday 19th May
To find out more call Claire Thomas on 01792 535337

3.17 Through this approach we endeavoured to do everything within our means to publicise that a local study was being undertaken in order to give all households living in bricks and mortar who may wish to move on to a site the opportunity to make their views known to us.

3.18 As a result of all of the efforts that were made this 3 households living in bricks and mortar were identified to interview.

Timing of the Fieldwork

3.19 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. As such all of the fieldwork was undertaken during the non-travelling season, and also avoided days of known local or national events. Fieldwork was completed between February 2016 and May 2017.

Calculating Current and Future Need

3.20 The primary change to PPTS (2015) in relation to the assessment of need is the change in the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. As the revised PPTS was only issued in 2015 only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied – these support the view that households need to be able to demonstrate that they travel for work purposes to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily due to education, ill health or old age. See Paragraph 2.19 for a recent example.

3.21 To identify need, PPTS (2015) requires an assessment for current and future pitch requirements, but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Applying the Planning Definition

3.22 The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:

- Whether any household members have travelled in the past 12 months.
- Whether household members have ever travelled.
- The main reasons for travelling.
- Where household members travelled to.
- The times of the year that household members travelled.
- Where household members stay when they are away travelling.
- When household members stopped travelling.
- The reasons why household members stopped travelling.
- Whether household members intend to travel again in the future.

- When and the reasons why household members plan to travel again in the future.

3.23 When the household survey was completed the outcomes from these questions on travelling were used to determine the status of each household against the planning definition in PPTS (2015). Through a combination of responses households need to provide sufficient information to demonstrate that household members travel for works purposes and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. The same definition applies to Travelling Showpeople as to Gypsies and Travellers.

3.24 Households that need to be considered in the GTAA fall under one of 3 classifications. Only those households that meet, or may meet, the planning definition will form the components of need to be included in the GTAA:

- Households that travel under the planning definition.
- Households that have ceased to travel temporarily under the planning definition.
- Households where an interview was not possible who *may* fall under the planning definition.

3.25 Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they will be assessed to provide the Councils with components of need to as part of their work on wider housing needs assessments.

3.26 It should be noted that the GTAA is based on the travelling circumstances of households at the time of the household interviews. It could be the case that the travelling circumstances of households may change and this will need to be considered by the Council when applications are made for households to join the waiting list or when considering a planning application for a private site. In addition it is recommended that the GTAA is continually reviewed as part of the Councils regular monitoring arrangements.

Unknown Households

3.27 As well as calculating need for households that meet the planning definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be considered as part of the GTAA where they are believed to be ethnic Gypsies and Travellers who **may** meet the planning definition. Whilst there is no law or guidance that sets out how the needs of these households should be addressed, an approach has been taken that seeks an estimate of potential need from these households. This will be a maximum additional need figure over and above the need identified for households that do meet the planning definition.

3.28 The estimate seeks to identify potential current and future need from many pitches known to be temporary or unauthorised, and through new household formation. For the latter the national rate of 1.50% has been used as the demographics of residents are unknown. This approach is consistent with the outcomes of a recent Planning Appeal where access to a site was not possible but basic information was known about the number of households residing there. (Planning Inspectorate Ref: APP/Z6950/A/14/2212012).

3.29 Should further information be made available to the Councils that will allow for the planning definition to be applied, these households could either form a confirmed component of need to be addressed through the GTAA or the SHMA/HEDNA.

3.30 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.

3.31 However, data that has been collected from over 1,800 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 10% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 250 interviews that have been completed) – and in some local authorities, particularly London Boroughs, no households meet the planning definition.

3.32 ORS are not implying that this is an Official National Statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are between 12,000-14,000 Gypsy and Traveller pitches in England and we have spoken to over 12% of them at a representative range of sites and just over 10% meet the planning definition. ORS also asked similar questions on travelling in over 2,000 pre-PPTS (2015) household interviews and also found that 10% of households would have met the PPTS (2015) planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.

3.33 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through the SHMA or HEDNA for example.

3.34 In terms of Local Plan policies, the Council could consider the use of a criteria-based policy (as suggested in PPTS) for any unknown households that do provide evidence that they meet the planning definition.

Households that do not meet the Planning Definition

3.34 Households who do not travel for work purposes now fall outside the planning definition of a Traveller. However Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equality Act 2010. In addition provisions set out in the Housing and Planning Act (2016) now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance[4] related to this section of the Act has been published setting out how the government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller

[4] "*Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats*." (March 2016)

will need to be assessed as part of the wider housing needs of the area, for example through the SHMA or HEDNA process, and will form a subset of the wider need arising from households residing in caravans. Whilst no longer a requirement to include in a GTAA an assessment of need for households that do not meet the planning definition has been completed to assist the Council in meeting need from these households.

Supply of Pitches

3.36 The first stage of the assessment sought to determine the number of occupied, vacant and potentially available supply in the study area:

- Current vacant pitches.
- Pitches currently with planning consent due to be developed within 5 years.
- Pitches vacated by people moving to housing.
- Pitches vacated by people moving from the study area (out-migration).

Current Need

3.37 The second stage was to identify components of current need, which is not necessarily the need for additional pitches because they may be able to be addressed by space already available in the study area. This is made up of the following. It is important to address issues of double counting:

- Households on unauthorised developments for which planning permission is not anticipated.
- Households on unauthorised encampments for which planning permission is not expected.
- Concealed, doubled-up or over-crowded households (including single adults).
- Households in bricks and mortar wishing to move to sites.
- Households in need on waiting lists for public sites.

Future Need

3.38 The final stage was to identify components of future need. This includes the following four components:

- Older teenage children requiring a pitch of their own.
- Households living on sites with temporary planning permissions.
- New household formation.
- In-migration.

3.39 Household formation rates are often the subject of challenge at appeals or examinations. ORS agree with the position now being taken by DCLG and firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on precedent.

3.40 All of these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers

and Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch needs are identified separately and the needs are identified in 5 year periods to 2032.

Pitch Turnover

3.41 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This is an approach that usually ends up with a significant under-estimate of need as in the majority of cases vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of a number of Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

> *West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.*

3.42 In addition a GTAA Best Practice Guide was produced in June 2016 by a number of organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

> *Assessments involving any form of pitch turnover in their supply relies upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.*

3.43 As such, other than current vacant pitches on sites that are known to be available, or those pitches identified during the household interviews as due to become available, pitch turnover has not been considered as a component of supply in this GTAA.

Transit Provision

3.44 PPTS (2015) also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas.

- Transit sites
- Temporary/Emergency stopping places
- Temporary (seasonal) sites
- Negotiated Stopping Agreements

3.45 In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to undertake analysis of any records of unauthorised sites and encampments, as well as information from the CLG Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring planning authorities and other stakeholders was also be taken into consideration when determining this element of need in the study area.

4. Gypsy, Traveller and Travelling Showpeople Sites and Population

4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans, but can vary in size. A site is a collection of pitches which form a development exclusively for Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots which are typically exclusively occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.

4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is the publicly-provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the licensees (similar to social housing).

4.3 The alternative to public residential sites are private residential sites and yards for Gypsies, Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally the majority of Travelling Showpeople yards are privately owned and managed.

4.4 The Gypsy, Traveller and Travelling Showpeople population also has other forms of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it, but has much more limited facilities. Both of these two types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.

4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the land owner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments occur on land which is not owned by the Gypsies and Travellers.

Sites and Yards in York

4.6 In York there are currently 3 public sites with 61 pitches; 2 private site with full planning permission with 4 pitches; no sites with temporary planning permission; no sites that are tolerated for planning purposes; 2 unauthorised sites with 6 pitches; and 1 temporary Travelling Showpeople yard with 1 plot. Further information can be found in Chapter 5 and **Appendix E**.

Figure 11 - Total amount of provision in York (June 2016)

Category	Sites/Yards	Pitches/Plots
Public sites (Council and Registered Providers)	3	61
Private with permanent planning permission	2	4
Private sites with temporary planning permission	0	0
Tolerated sites	0	0
Unauthorised Sites	2	6
Private Travelling Showpeople yards	0	0
Temporary Travelling Showpeople yards	1	1

Caravan Count

4.7 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year, and reported to DCLG. This is a statistical count of the number of *caravans* on both authorised and unauthorised sites across England. With effect from July 2013, DCLG has renamed the 'Gypsy and Traveller Caravan Count' as the 'Traveller Caravan Count.'

4.8 As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a 'snapshot in time' conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise any caravans that are away from sites on the day of the count will not be included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However the Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out later in this report.

5. Survey of Travelling Communities

Interviews with Gypsies and Travellers

5.1 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in the study area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future site provision. The Site Record Form can be found in **Appendix C**.

5.2 Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards and encampments in the study area. Interviews were completed between February and June 2016. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The table below identify the sites that ORS staff visited during the course of the fieldwork, and also set out the number of interviews that were completed at each site, together with the reasons why interviews were not completed where this information is available. A total of 51 interviews were completed and this represents an overall response rate of 71% which is comparable with studies completed elsewhere in England.

Figure 12 - Sites visited in York

Site Status	Pitches/Plots	Interviews	Reasons for not completing interviews
Public Sites			
James Street Traveller Site, York	20	19	1 x refusal
Osbaldwick Caravan Site, York	18	9	8 x refusals, 1 x no contact possible
Water Lane Caravan Site, York	23	20	3 x no contact possible
Private Sites			
Home Lea, York	2	1	1 x vacant pitch
Outgang Lane, York	2	0	2 x no contact possible
Unauthorised Sites			
Water Lane Caravan Site, York	1	0	1 x no contact possible
Flaxton	5	0	5 x no contact possible
Travelling Showpeople			
The Stables, York	1	2	1 x no contact possible
TOTAL	**72**	**51**	

Efforts to contact bricks and mortar

5.3 ORS applied a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan examinations and planning appeals. Contacts were sought

through a range of sources including the interviews with people on existing sites and yards, intelligence from the Councils and housing providers, and adverts on social media (including the Friends Families and Travellers Facebook group), as well as writing to households on waiting lists for public sites. In addition contacts identified by the York Travellers Trust using an advert prepared by ORS were followed-up through a series of telephone interviews.

5.4 At the time of concluding this report 3 contacts had been identified to interview (a fourth contact was interviewed but they were currently doubled-up on one of the public sites and had already been interviewed during the main fieldwork). This is consistent with the outcomes of many GTAAs where few if any households living in bricks and mortar come forward to be interviewed. Whilst the previous GTAA did identify a desire for a number of households to move to a site only a small number are included on the waiting list and the Council have not reported any other households enquiring about the availability of pitches or about planning consent for private sites.

6. Current and Future Pitch Provision

Introduction

6.1 This section focuses on the additional pitch provision which is needed by the Council currently and to 2032. This includes both current unmet need and need which is likely to arise in the future. This time period allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.

6.2 It should be noted that this section is based upon a combination of the on-site surveys, planning records and previous stakeholder interviews. In many cases, the survey data is not used in isolation, but instead is used to validate information from planning records or other sources.

6.3 This section concentrates not only upon the total additional provision which is required in the area, but also whether there is a need for any transit provision.

PPTS (2015) Planning Definition

6.4 As well as assessing housing need PPTS (2015) requires a GTAA to determine whether households living on sites, yards, encampments and in bricks and mortar fall within the planning definition of a Gypsy, Traveller or Travelling Showperson. Only households that fall within the planning definition, and those who *may* meet the planning definition (households where an interview was not completed), will have their housing needs assessed separately from the wider population in the GTAA. The planning definition now excludes those who have ceased to travel permanently.

New Household Formation Rates

6.5 In order to calculate future household growth a percentage compound net household growth rate is used. This is the same as how banks calculate compound interest. Compound growth is growth calculated on the initial sum and then on the accumulated growth of previous periods. As an example in relation to household growth if you start with 100 households and apply a rate of 1.50%, after 1 year the total will be 101.5. For year 2 the rate of 1.50% is then applied to 101.5 and so on for subsequent years. This is set out in the table below for different percentage growth rates.

Figure 13 – Example of compound household growth rates

	Growth rate			
Year	**1.00%**	**1.50%**	**2.00%**	**2.50%**
0	0	0	0	0
1	1	1	2	2
2	2	3	4	5
3	3	5	6	8
4	4	6	8	10
5	5	8	10	13
6	6	9	13	16
7	7	11	15	19
8	8	13	17	22
9	9	14	20	25
10	10	16	22	28
11	12	18	24	31
12	13	20	27	34
13	14	21	29	38
14	15	23	32	41
15	16	25	35	45

6.6 Nationally, a household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller assessments, even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates*. The main conclusions are set out here and the full paper is in **Appendix F**.

6.7 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data is very unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis.

6.8 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.

6.9 The often assumed 3.00% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers. This view has been supported by Planning Inspectors in a number of Decision Notices. The most recent was in relation to an appeal in Doncaster (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used. The Inspector concluded:

> *In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.5% but that a 2.5% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.5% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.5% figure is justified in the case of Doncaster.*

6.10 In addition the Technical Note has recently been accepted as a robust academic evidence base and has been published by the Social Research Association in its journal Social Research Practice. The overall purpose of the journal is to encourage and promote high standards of social research for public benefit. It aims to encourage methodological development by giving practitioners the space and the incentive to share their knowledge - see link below.

http://the-sra.org.uk/journal-social-research-practice/

6.11 ORS assessments take full account of the net local household growth rate per annum for each local authority, calculated on the basis of demographic evidence from the site surveys, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates.

6.12 Overall, the household growth rate used for the assessment of future needs has been informed by local evidence for each local authority. This demographic evidence has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 in each local authority (by travelling status).

6.13 In certain circumstances where the numbers of households and children are low it is not appropriate to apply a percentage rate for new household formation. In these cases a judgement will be made on likely new household formation based on the age and gender of the children. This will be based on the assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.

6.14 Research by ORS has also identified a national growth rate of 1.00% for Travelling Showpeople and this has also been adjusted locally based on site demographics.

6.15 The table below sets out the household growth rates that have been used for this assessment - with the national rates of 1.50% being used for unknown Gypsies and Travellers and 1.00% used for unknown Travelling Showpeople where applicable.

Figure 14 – New household formation rates used

Gypsies & Travellers		Travelling Showpeople	
Meet Planning Definition	Do Not Meet Planning Definition	Meet Planning Definition	Do Not Meet Planning Definition
1.80%	2.00%	Demographics	n/a

Breakdown by 5 Year Bands

6.16 In addition to tables which set out the overall need for Gypsies, Travellers and Travelling Showpeople, the overall need has also been broken down by 5 year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from older teenage children, and net movement from bricks and mortar) in the first 5 years. In addition the total net new household formation is split across the 5 year bands based on the compound rate of growth that was applied – as opposed to being spread evenly.

Applying the Planning Definition

6.17 The outcomes from the questions in the household survey on travelling were used to determine the status of each household against the planning definition in PPTS (2015). This assessment was based on the verbal responses to the questions given to interviewers as it is understood that oral evidence is capable of being sufficient when determining whether households meet the planning definition. Only those households that meet the planning definition, in that they were able to provide information during the household interview that **they travel for work purposes, and stay away from their usual place of residence when doing so – or that they have ceased to travel temporarily due to education, ill health or old age**, form the components of need that will form the baseline of need in the GTAA. Households where an interview was not completed who **may** meet the planning definition have also been included as a potential additional component of need from unknown households. Need for households that do not meet the planning definition are included in the **Appendix D**.

6.18 Information that was sought from households where an interview was completed allowed each household to be assessed against the planning definition of a Traveller. This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the planning status of households living on sites in York.

Figure 15 - Planning status of households in York

Site Status	Meets Planning Definition	Unknown	Does Not Meet Planning Definition
Gypsies and Travellers			
Public Sites	8	13	40
Private Sites	1	2	0
Unauthorised Sites	0	6	0

Bricks and Mortar	2	0	3
Sub-Total	**11**	**21**	**43**
Travelling Showpeople			
Temporary Yards	2	0	0
Sub-Total	**2**	**0**	**0**
TOTAL	**13**	**21**	**43**

6.19 Figure 15 shows that for Gypsies and Travellers[5] 11 households and for Travelling Showpeople 2 households meet the planning definition of a Traveller in that they were able to provide information demonstrating that they travel for work purposes and stay away from their usual place of residence, or have ceased to travel temporarily. A total of 43 Gypsy and Traveller households[5] that were interviewed did not meet the planning definition as they were not able to demonstrate that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons to visit fairs, relatives or friends, and others had ceased to travel permanently – none of these households meet the planning definition.

6.20 The number of households on each site where an interview was not possible are recorded as unknown. The reasons for this include households that refused to be interviewed and households that were not present during the fieldwork period – despite up to 3 visits (this is set out in Figure 12).

Bricks and Mortar Interviews

6.21 A total of 3 interviews were completed with households living in bricks and mortar. This is consistent with the outcomes of many GTAAs where few if any households living in bricks and mortar come forward to be interviewed. Whilst the previous GTAA did identify a desire for a number of households to move to a site only a small number are included on the waiting list and the Council have not reported any other households enquiring about the availability of pitches or about planning consent for private sites. One household and members of a second household meet the planning definition and 1 household and members of a second household do not.

6.22 It is recommended that the Council engage with the household that meets the planning definition to encourage them to apply to be on the waiting list for a pitch on a public site, and in the short-term seek to identify a Council property closer to one of the Council sites for them to move to. It is also recommended that the 2 members of the second household that meet the planning definition are included in the assessment as components of current need.

6.23 It is recommended that the Council engage with the household that does not meet the planning definition to identify a Council property closer to one of the Council sites for them to move to in the short-term. In the longer-term they have expressed a preference to develop a private site. It is also recommended that the 2 members of the second household that do not meet the planning definition are included in the assessment as components of current need – one current and one teenage child in need of a pitch of their own in the first 5 years of the GTAA period.

[5] Including those living in bricks and mortar.

Figure 16 - Breakdown of need for bricks and mortar households

Household	Meets Planning Definition	Do Not Meet Planning Definition	Address short-term	Address long-term
Household 1	1	0	Move to a Council property nearer to an existing site.	Encourage to apply to be on waiting list for a public pitch.
Household 2	2	2	Include as components of current and future need.	n/a
Household 3	0	1	Move to a Council property nearer to an existing site.	Preference to develop a private site.

Waiting Lists

6.24 There are 3 public sites in York and the Council were able to confirm that there were 8 households are on the waiting lists for these sites at the time of the GTAA. Of these 3 are currently living on one of the public sites in York and have been included as components of need as concealed households or adults who do not meet the planning definition. A further 1 household is currently living on an unauthorised pitch in York and has been included as potential need from unknown households. An additional 2 households are living in bricks and mortar and 2 live outside of York but it was not possible to make complete interviews with these households. Should households on the waiting list wish to be considered for a tenancy on one of the public sites it is likely that they will need to provide information on their travelling patterns during the site allocation process as and when a pitch becomes available.

6.25 Households on the waiting list are not included as components of need in their own right as it has been demonstrated that there is a reasonable pitch turnover rate on public sites in York.

Pitch Needs – Gypsies and Travellers that meet the Planning Definition

6.26 There were 9 households that were interviewed who were able to provide evidence that they meet the planning definition of a Gypsy or Traveller – 8 were living on public sites and 1 was living on a private site.

6.27 Analysis of the interviews completed with households that meet the planning definition indicated that there is a current need for 2 additional pitches from household members living in bricks and mortar, and new household formation of 3 pitches from households living on sites. Analysis of the interviews also identified a short-term supply of 3 pitches due to a household on a public site stating that they are seeking to move to a site in another local authority, and 2 households on public sites stating that they are seeking to move to bricks and mortar in another local authority.

6.28 Therefore, taking the supply of 3 pitches into consideration, the overall level of additional need for those households who meet the planning definition of a Gypsy or Traveller is for **2 additional pitches** over the 16 year GTAA period.

Figure 17 – Additional need for Gypsy and Traveller households in York that meet the Planning Definition (2016-2032)

Gypsies and Travellers – Meeting Planning Definition	Pitches
Supply of Pitches	
Available vacant public and private pitches	0
Unimplemented pitches on new sites	0
Vacated by households moving to bricks and mortar	2
Out-migration	1
Total Supply	**3**
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/doubling-up/over-crowding	0
Movement from bricks and mortar	2
Households on waiting lists for public sites	0
Total Current Need	**2**
Future Need	
Currently on sites with temporary planning permission	0
5 year need from older teenage children	0
In-migration	0
Net new household formation *(Household base 9 and formation rate 1.80%)*	3
Total Future Need	**3**
Net Pitch Need = (Current and Future Need – Total Supply)	**2**

Figure 18 – Additional need for Gypsy and Traveller households in York that meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	0	1	1	0	**2**

Pitch Needs – Unknown Gypsies and Travellers

6.29 Whilst it was not possible to determine the travelling status of a total of 21 households as they either refused to be interviewed, or were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be ethnic Gypsies and Travellers and may meet the planning definition.

6.30 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.

6.31 However data that has been collected from over 1,800 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 10% of households that have been interviewed meet the planning definition – and in some local authorities, particularly London Boroughs, no households meet the planning definition.

6.32 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need new Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through other means.

6.33 Should further information be made available to the Council that will allow for the planning definition to be applied the overall level of current need could rise by up to **6 additional unauthorised pitches** and the overall level of future need could rise by up to **6 additional pitches from new household formation** (this uses a base of the 21 households and a net growth rate of 1.50%[6]). Therefore total additional need could increase by **up to 12 additional pitches**, plus any concealed adult households or 5 year need arising from older teenagers living in these households. However, as an illustration, if the ORS national average of 10% were to be applied this could be as few as 1 additional pitch.

Figure 19 – Maximum additional need for unknown households in York (2016-2032)

Gypsies and Travellers	Pitches
Supply of Pitches	
Available vacant public and private pitches	0
Unimplemented pitches on new sites	0
Vacated by households moving to bricks and mortar	0
Out-migration	0
Total Supply	**0**
Current Need	
Households on unauthorised developments	6
Households on unauthorised encampments	0
Concealed households/doubling-up/over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public sites	0
Total Current Need	**6**
Future Need	
Currently on sites with temporary planning permission	0
5 year need from older teenage children	0
In-migration	0
Net new household formation (*Base number of households 21 and formation rate 1.50%*)	6
Total Future Need	**6**
Net Pitch Need = (Current and Future Need – Total Supply)	**12**
GTAA based on 10% of households meet definition	**1**
SHMA based on 90% of households not meeting definition	**11**

[6] The ORS *Technical Note on Population and Household Growth (2015)* has identified a national growth rate of 1.50% which has been applied in the absence of further demographic information about these households.

Figure 20 – Maximum additional need for unknown households in York by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	7	2	2	**1**	**12**

Pitch Needs – Gypsies and Travellers that do not meet the Planning Definition

6.34 A breakdown of need for households that do not meet the planning definition can be found in **Appendix D**. In summary a total of 41 households generate total additional need for 33 pitches.

Summary of Need for Gypsies and Travellers

6.35 The table below summarises the overall need for Gypsies and Travellers in York for the GTAA period to 2032 broken down by where this need should be addressed by the Council.

6.36 The previous GTAA identified a need for 66 additional pitches over a similar 16 year period. The main differences between the 2 sets of outputs is that the 2014 study identified need of 10 additional pitches from households living in bricks and mortar and used a new household formation rate of 2.50% giving additional future need of 17 households. Levels of supply, unauthorised and concealed households are consistent in both studies.

Figure 21 – Summary of need for Gypsies and Travellers in York

	GTAA	SHMA/HEDNA	Total
Households that meet the Planning Definition (including 10% of unknown need)	3	0	**3**
Households that do not meet the Planning Definition (including 90% of unknown need)	0	44	**44**
TOTAL	**3**	**44**	**47**

Travelling Showpeople Needs

6.37 The study identified 1 small yard in York with 1 plot which has temporary planning permission. A total of 2 interviews were completed with households living on the yard - a family and a single elderly resident. Through a combination of the household interviews and details provided to the Council it has been confirmed that the household living on the plot have submitted the land as part of the Local Plan site identification process for a total of 3 plots – 2 for the current households and 1 for their young son in years 16 of the Plan. Therefore total need could increase by **3 additional plots**.

Figure 22 – Maximum additional need for unknown Travelling Showpeople households in York (2016-2032)

Travelling Showpeople - Unknown	Plots
Supply of Plots	
Additional supply from vacant public and private plots	0
Additional supply from plots on new yards	0
Plots vacated by households moving to bricks and mortar	0
Plots vacated by households moving away from the study area	0
Total Supply	**0**

Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/Doubling-up/Over-crowding	0
Movement from bricks and mortar	0
Households on waiting lists for public yards	0
Total Current Need	**0**
Future Need	
Households on yards with temporary planning permission	2
5 year need from older teenage children	0
In-migration	0
New household formation *(Derived from site demographics)*	1
Total Future Needs	**3**
Net Plot Need = (Current and Future Need – Total Supply)	**3**

Figure 23 – Addition need for unknown Travelling Showpeople households in York by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	2	0	0	1	**3**

Transit Sites / Temporary Stopping Places

6.38 Information from the Council and from the Caravan Count has identified low numbers of encampments on land not owned by Travellers in York. Information was also provided to suggest that these encampments are transient and sort-term in nature. In addition there is a private transit site in York with 18 transit pitches. At the time of the GTAA this was only occupied by 6 households.

6.39 It has been suggested that there will need to be an increase in transit provision across the country as a result of changes to PPTS leading to more households travelling. This may well be the case but it will take some time for any changes to materialise. As such the use of historic evidence to make an assessment of future transit need is not recommended at this time. Any recommendation for future transit provision will need to make use of a robust post-PPTS (2015) evidence base and there has not been sufficient time yet for this to happen.

6.40 It is therefore recommended that the situation relating to levels of unauthorised encampments should be continually monitored whilst any potential changes associated with PPTS (2015) develop, and in the short-term the Councils should consider the use of short-term toleration or negotiated stopping agreements to deal with any encampments. A review of the evidence base relating to unauthorised encampments should be undertaken in autumn 2018 once there is a new 3 year evidence base following the changes to PPTS in August 2015. This will establish whether there is a need for investment in more formal transit sites or emergency stopping places.

6.41 To deal with any unauthorised encampments in the interim period a management approach as opposed to an infrastructure solution is recommended through the use of tolerated or negotiated stopping arrangements. In essence this means that the Council engage with households on unauthorised encampments to identify how long they are seeking to stay in the area and if it is

found that the length of stay is estimated to be short, and if the site is acceptable for short-term occupation, an agreement is reached that they can stay where they are without enforcement actions for a set period of time provided they agree to abide by certain conditions such as not littering or causing noise nuisance etc. If they breach any conditions or overstay the agreed occupation period then enforcement action can be taken. This approach has been pioneered by Leeds Gate[7] in the North East of England.

6.42 Temporary stopping places can also be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold water supply; portaloos; sewerage disposal point and refuse disposal facilities.

[7] See www.leedsgate.co.uk for further information.

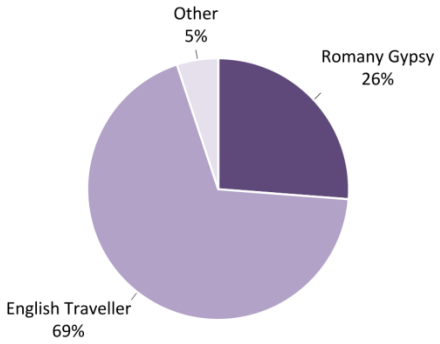
Appendix A: Glossary of Terms

Amenity block/shed	A building where basic plumbing amenities (bath/shower, WC, sink) are provided.
Bricks and mortar	Mainstream housing.
Caravan	Mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers.
Chalet	A single storey residential unit which can be dismantled. Sometimes referred to as mobile homes.
Concealed household	Households, living within other households, who are unable to set up separate family units.
Doubling-Up	Where there are more than the permitted number of caravans on a pitch or plot.
Emergency Stopping Place	A temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel.
Green Belt	A land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
GTAA	Gypsy and Traveller Accommodation Assessment
Household formation	The process where individuals form separate households. This is normally through adult children setting up their own household.
In-migration	Movement into or come to live in a region or community
Local Plans	Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople.
Out-migration	Movement from one region or community in order to settle in another.
Personal planning permission	A private site where the planning permission specifies who can occupy the site and doesn't allow transfer of ownership.
Pitch/plot	Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.
Private site	An authorised site owned privately. Can be owner-occupied, rented or a mixture of owner-occupied and rented pitches.

Site	An area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans/chalets/vehicles. Can contain one or multiple pitches/plots.
Social/Public/Council Site	An authorised site owned by either the local authority or a Registered Housing Provider.
Temporary planning permission	A private site with planning permission for a fixed period of time.
Tolerated site/yard	Long-term tolerated sites or yards where enforcement action is not expedient and a certificate of lawful use would be granted if sought.
Transit provision	Site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay.
Unauthorised Development	Caravans on land owned by Gypsies and Travellers and without planning permission.
Unauthorised Encampment	Caravans on land not owned by Gypsies and Travellers and without planning permission.
Waiting list	Record held by the local authority or site managers of applications to live on a site.
Yard	A name often used by Travelling Showpeople to refer to a site.

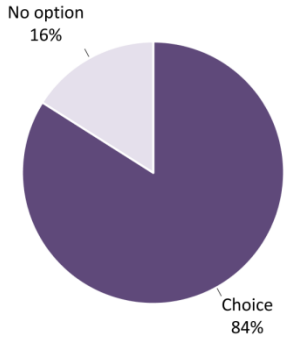
Appendix B - Overall Household Survey Results

Figure 1 – Type of Accommodation
Base: All respondents (38)



Around 7 in 10 of respondents (69%/26 respondents) are English Travellers and around a quarter (26%/10 respondents) are Romany Gypsy.

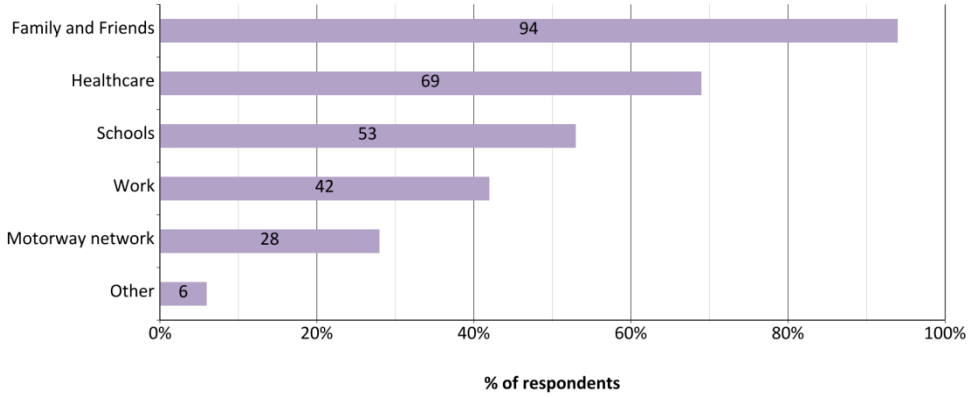
Figure 2 – Did you live here out of your own choice or because there was no other option?
Base: All respondents (38)



The majority (84%/32 respondents) of respondents live at their current site by choice – however, less than one fifth (16%/6 respondents) said that there was no other option.

Figure 3– Is this site suitable for your household? If so why and if not why not? YES - good access to...

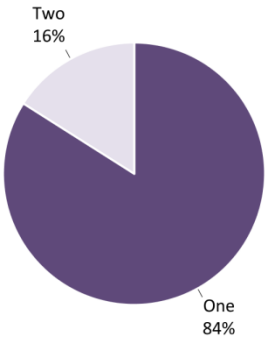
Base: Respondents who said the site is suitable for their household (36)



The vast majority (94%/34 respondents) of respondents who said that the site is suitable for their household said it was because of family and friends. Around 7 in 10 respondents (69%/25 respondents) said it was because of healthcare and around half or less said it was because of schools (53%/19 respondents), work (42%/15 respondents) or motorway networks (28%/10 respondents).

A smaller proportion of respondents gave reason for the site NOT being suitable for their household. These reasons include work (3 respondents), family and friends (3 respondents), healthcare (2 respondents) and schools (1 respondent).

Figure 4– How many separate families or unmarried adults live on this pitch?
Base: All respondents (32)

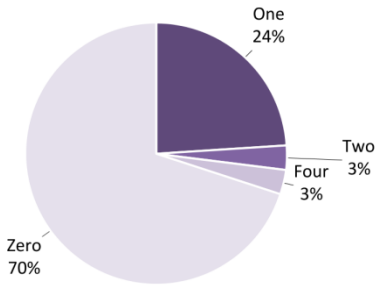


The majority of respondents (84%/27 respondents) said that their pitch is occupied by only one family or unmarried adult, and 16% (5 respondents) said their pitch is occupied by two families or unmarried adults.

Figure 5 - Demographics
Base: All respondents

Demographics							
Person 1		Person 2		Person 3		Person 4	
Male	Female	Male	Female	Male	Female	Male	Female
21%	79%	55%	45%	55%	46%	67%	33%
Person 5		Person 6		Person 7			
Male	Female	Male	Female	Male	Female		
46%	55%	100%	-	-	100%		

Figure 6 – How many families or unmarried adults living on this pitch are in need of a pitch of their own in the next 5 years?
Base: All respondents (37)



7 in 10 (70%/26 respondents) said that there are no families or unmarried adults living on their pitch that are in need of a pitch of their own in the next 5 years, while around a quarter (24%/9 respondents) stated that there is only one. A minority of respondents (3%/1 respondent) each said there are two or four families or unmarried adults in need of a pitch of their own in the next 5 years.

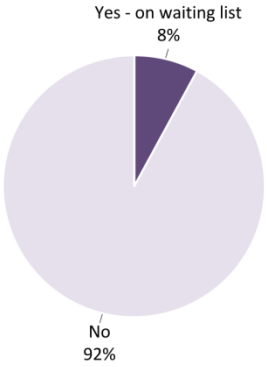
Respondents were then asked how many – if any – of their children will need a home of their own in the next 5 years as a result of getting married or leaving home. They were then asked when and where these homes will be needed.

Figure 7– How many of your children will need a home of their own in the next 5 years as a result of getting married or leaving home? Where and when will these be needed?
Base: All respondents (10)

How many of your children will need a home of their own in the next 5 years as a result of getting married or leaving home?					
10					
Where will these be needed?					
On this site	Public site in York	Private site in York	Site not in York	Housing in York	Housing not in York
4	3	-	-	-	-
When will these be needed?					
Now	In 1-2 Years	In 2-5 Years	Not Answered		
4	-	6	-		

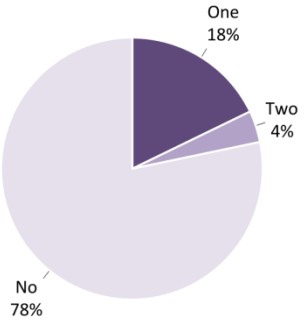
In total there are **10 children that will need a home of their own in the next 5 years** as a result of getting married or leaving home, and that it is know that 7 of these new homes is needed in York (3 respondents did not answer the question). It is known that **4 are needed are now**, and that **6 are needed in 2-5 years**.

Figure 8 – Is anyone living here on the waiting list for a pitch in this area?
Base: All respondents (36)



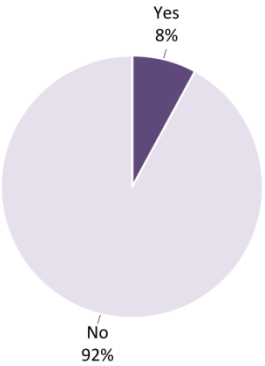
Only 3 respondents (8% of respondents) said that anyone living on their pitch is on the waiting list. 1 respondent said that there was one person on their pitch on the waiting list, and 2 respondents said that there are three people. 1 respondent has been on the waiting list for 6-12 months and 2 respondents have been on there for 2+ years.

Figure 9 – If they are not on the waiting list, do any of the people living here want to be on the waiting list?
Base: Respondents who are not on the waiting list (28)



Almost four fifths (78%/22 respondents) stated that none of the people living on their site want to be on the waiting. Around a fifth (18%/ 5 respondents) said that one person wanted to be on the waiting list and 4% (1 respondent) said that two people wanted to be on the waiting list.

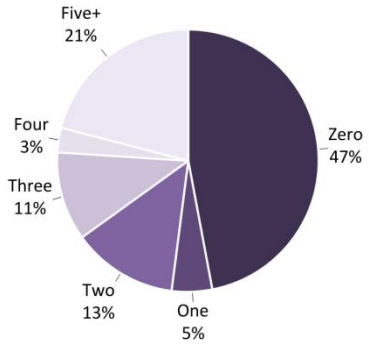
Figure 10 – Do you plan to move from this site in the next 5 years?
Base: All respondents (37)



The vast majority (92%/34 respondents) do not plan to move from their current site in the next 5 years. 3 respondents, said yes to this question. 2 of these respondents said that they would move into bricks and mortar in another council and 1 respondent would move to a site in another council. All 2 respondents who answered the question said that they would prefer to rent a public site and the 1 respondent who answered said that they cannot afford to buy a private pitch or site. All 4

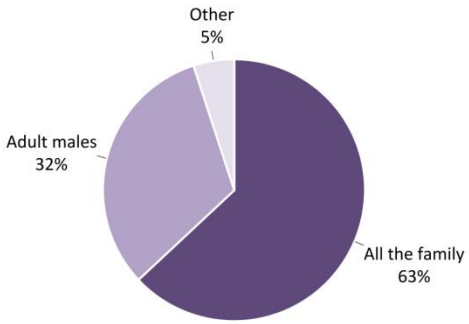
respondents who were asked the question said that they do not own another site or land which they would like to develop.

Figure 11 – How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months?
Base: All respondents (38)



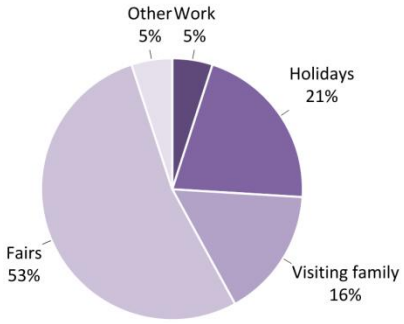
Less than half (47%/18 respondents) said they or members of their family have made zero trips, living in a caravan or trailer, away from their permanent base in the last 12 months. Around a fifth (21%/8 respondents) has made five or more trips. Smaller proportions of respondents have made two (13%/5 respondents), three (11%/4 respondents), one (5%/2 respondents) and four (3%/1 respondent).

Figure 12 – If you or members of your family have travelled in the last 12 months, which family members travelled?
Base: Respondents who have/whose family have travelled in the last 12 months (19)



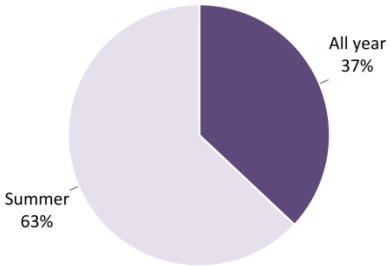
More than three fifths (63%) of respondents said that all the family have travelled in the last 12 months. Around a third (32%) said that just the adult males have travelled in the last 12 months.

Figure 13 – What was the main reason for travelling?
Base: All respondents (19)



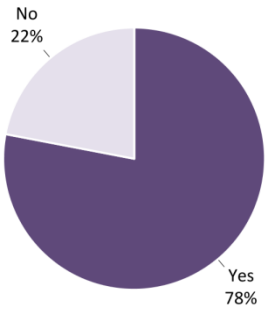
Over half of respondents (53%) that had travelled in the last 12 months reported that they had travelled for fairs. Around a quarter reported travelling for holidays (21%) or to visit family while 5% travelled for work.

Figure 14 – At what time of year do you or family members usually travel?
Base: All respondents (19)



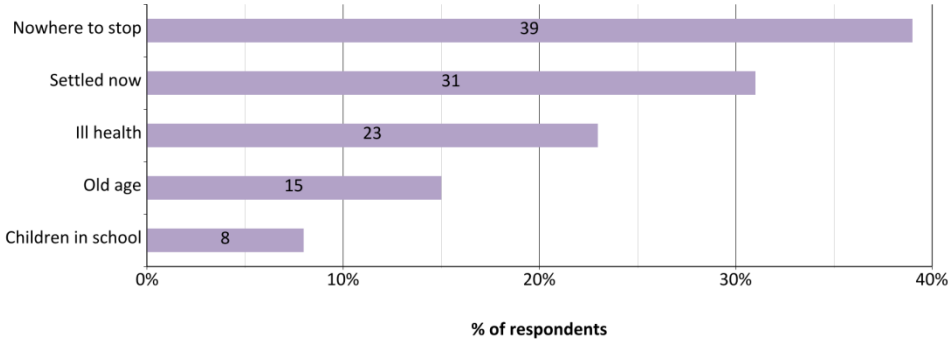
A slight majority of respondents (63%) said that they or family members usually travel during the summer. Just under two fifths (37%) said they travelled all year. Respondents were asked where they usually stay when they are travelling. Of the 15 respondent who answered the question 5 respondents stay on the roadside and 5 respondents stay with friends/family. 8 respondents stay in 'other' places.

Figure 15 – Have you or family members ever travelled?
Base: Respondents who have not travelled in the last 12 months (18)



Respondents who said they had **not** travelled in the last 12 months were asked if they or their family had ever travelled. Almost four fifths (78%/14 respondents) said yes.

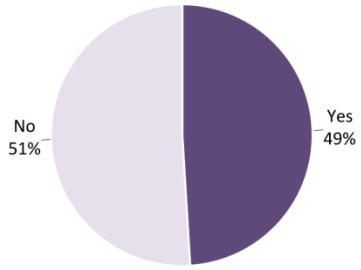
Figure 16 – Why do you not travel anymore?
Base: All respondents (13)



Respondents who did **not** travel were asked why.

Around two fifths (39%/5 respondents) said they have nowhere to stop, under a third (31%/4 respondents) said that they are settled now and over a fifth (23%/3 respondents) said it is due to ill health. Smaller proportions of respondents said they do not travel because of old age (15%/2 respondents) and children in school (8%/1 respondent).

Figure 17 – Do family members plan to travel in the future?
Base: All respondents (37)



Around half (49%/18 respondents) said that family members planned to travel in the future.

Respondents were then asked *why* family planned to travel in the future. **2** respondents said that family members **planned to travel in the future for work**. Others mentioned fairs, holidays and visiting friends and family.

Appendix C – Household Interview Questions

NOT FOR CIRCULATION

GTAA Questionnaire 2016

INTERVIEWER: Good Morning/afternoon/evening. My name is < > from Opinion Research Services, working on behalf of XXXX Council.

The Council are undertaking a study of Gypsy, Traveller and Travelling Showpeople accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showpeople household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households.

ORS is registered under the Data Protection Act 1998. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households

A General Information

A1 Name of planning authority:
INTERVIEWER please write in

A2 Date/time of site visit(s):
INTERVIEWER please write in
DD/MM/YY | TIME

A3 Name of interviewer:
INTERVIEWER please write in

A4 Address and pitch number:
INTERVIEWER please write in

A5 Type of accommodation: *INTERVIEWER please cross one box only*

Council	Private rented	Private owned	Unauthorised	Bricks and Mortar
☐	☐	☐	☐	☐

A6 Name of Family:
INTERVIEWER please write in

A7 Ethnicity of Family:
INTERVIEWER please cross one box only

Romany Gypsy	Irish Traveller	Scots Gypsy or Traveller	Show Person
☐	☐	☐	☐
New Traveller	**English Traveller**	**Welsh Gypsy**	**Non-Traveller**
☐	☐	☐	☐

Other *(please specify)*

A8 Number of units on the pitch:
INTERVIEWER please write in

Mobile homes	Touring Caravans	Day Rooms	Other *(please specify)*

NOT FOR CIRCULATION

A9 **Is this site your main place of residence? If not where is?**
INTERVIEWER: Please cross one box only

Yes ☐ No ☐ | If not main place of residence where is (please specify)

A10 **How long have you lived here? If you have moved in the past 5 years, where did you move from?** *INTERVIEWER: Please write in below*

Years	Months	If you have moved in the past 5 years, where did you move from? Include ALL moves

A11 **Did you live here out of your own choice or because there was no other option? If there was no other option, why?** *INTERVIEWER: Please cross one box only*

Choice ☐ No option ☐ | If no option, why?

A12 **Is this site suitable for your household? If so why and if not why not? (For example close to schools, work, healthcare, family and friends etc.)**
INTERVIEWER: Please cross one box only

Yes ☐ No ☐ | Reasons (please specify)

A13 **How many separate families or unmarried adults live on this pitch?**
INTERVIEWER: Please cross one box only

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

B Demographics

B1 **Demographics — Household 1** *INTERVIEWER: Please write-in*

Person 1		Person 2		Person 3	
Sex	Age	Sex	Age	Sex	Age

Complete additional forms for each household on pitch *INTERVIEWER: Please write-in*

Person 4		Person 5		Person 6		Person 7		Person 8	
Sex	Age	Sex	Age	Sex	Age	Sex	Age	Sex	Age

C Accommodation Needs

C1 **How many families or unmarried adults living on this pitch are in need of a pitch of their own in the next 5 years?** *INTERVIEWER: Please cross one box only*

INTERVIEWER: AN ADULT IS DEFINED AS 16+

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

Other *Please specify*

NOT FOR CIRCULATION

C2 How many of your children will need a home of their own in the next 5 years? If they live here now, will they want to stay on this site? If not, where would they wish to move? (e.g. other site, in bricks and mortar etc.) If they do not live on this site, where do they currently live and would they want to move on to this site or another local site if they could get a pitch? *INTERVIEWER: Please cross one box only*

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

Other *Please specify*

Details (Please specify)

D Waiting List

D1 Is anyone living here on the waiting list for a pitch in this area?
INTERVIEWER: Please cross one box only

Yes ☐ → *Continue to D2*
No ☐ → *Go to D4*

D2 How many people living here are on the waiting list for a pitch in this area?
INTERVIEWER: Please cross one box only

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

Other *(Please specify)*

Details (Please specify)

D3 How long have they been on the waiting list? *INTERVIEWER: Please cross one box only*

0-3 months ☐ 3-6 months ☐ 6-12 months ☐ 1-2 years ☐ 2+ years ☐

Other (Please specify)

Details (Please specify)

D4 If they are not on the waiting list, do any of the people living here want to be on the waiting list? (INTERVIEWER if they do - please take their contact details)
INTERVIEWER: Please cross one box only

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5 ☐ 6 ☐ 7 ☐ 8 ☐ 9 ☐ 10 ☐

No ☐ Other *(Please specify)*

Details (Please specify) and take contact details)

NOT FOR CIRCULATION

E Future Accommodation Needs

E1 Do you plan to move from this site in the next 5 years? If so, why?

INTERVIEWER: Please cross one box only

Yes ☐ *If yes* → *Continue to E2*

No ☐ *If no* → *Go to F1*

If so, why? (please specify)

E2 Where would you move to? *INTERVIEWER: Please cross one box only*

Another site in this area *(specify where)*	A site in another council area *(specify where)*	Bricks and mortar in this area *(specify where)*	Bricks and mortar in another council area *(specify where)*	Other *(Please specify)*
☐	☐	☐	☐	☐

Please specify where they would move to

E3 If you want to move would you prefer to buy a private pitch or site, or rent a pitch on a public or private site? *INTERVIEWER: Please cross one box only*

Private buy	Private rent	Public rent
☐	☐	☐

E4 Can you afford to buy a private pitch or site? *INTERVIEWER: Please cross one box only*

Yes	No
☐	☐

E5 Are you aware of, or do you own any land that could have potential for new pitches? *INTERVIEWER: Please cross one box only*

Yes	No
☐	☐

Please ask for details on where land/site is located and who owns the land/site?

NOT FOR CIRCULATION

F Travelling

F1 How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months?
INTERVIEWER: Please cross one box only

0 ☐ → *Go to F6*

1 ☐ 2 ☐ 3 ☐ 4 ☐ 5+ ☐ → *Continue to F2*

F2 If you or members of your family have travelled in the last 12 months, which family members travelled? *INTERVIEWER: Please cross one box only*

All the family ☐ Adult males ☐ Other ☐ If other, please specify

F3 What were the main reasons for travelling? *INTERVIEWER: Please cross all that apply*

Work ☐ Holidays ☐ Visiting family ☐ Fairs ☐ Other ☐

Details / specify if necessary

F4 At what time of year do you or family members usually travel? And for how long?
INTERVIEWER: Please cross one box only

All year ☐ Summer ☐ Winter ☐

And for how long?

F5 Where do you or family members usually stay when they are travelling?
INTERVIEWER: Please cross all boxes that apply

LA transit sites ☐ Private transit sites ☐ Roadside ☐ Friends/ family ☐ Other ☐ If other, please specify

F6 INTERVIEWER: Ask F6 — F8 ONLY if F1 = 0. Otherwise, go to F9
Have you or family members ever travelled? *INTERVIEWER: Please cross one box only*

Yes ☐ → *Continue to F7*
No ☐ → *Go to F9*

F7 When did you or family members last travel? *INTERVIEWER: Please write in*

Details

F8 Why do you not travel anymore? *INTERVIEWER: Cross all boxes that apply & probe for details*

Children in school ☐ Ill health ☐ Old age ☐ Settled now ☐ Nowhere to stop ☐ No work opportunities ☐ Other ☐

If other, please specify

Details about children in school, types of ill health, or looking after relative with poor health, and specific problems/issues relating to old age

NOT FOR CIRCULATION

F9 **Do you or other family members plan to travel in the future?**
INTERVIEWER: Please cross one box only

Yes	☐	→ *Continue to F10*
No	☐	→ *Go to G1*
Don't know	☐	→ *Go to G1*

F10 **When, and for what purpose do you/they plan to travel?**

Details

F11 **Is there anything else you would like to tell us about your travelling patterns?**

Details

G Any other information

G1 **Any other information about this site or your accommodation needs?**
INTERVIEWER: Please write in

Details (e.g. can current and future needs be met by expanding or intensifying the existing site?

G2 **Site/Pitch plan? Any concerns?** *INTERVIEWER: Please sketch & write in*

Sketch of Site/Pitch — any concerns?

Are any adaptations needed?

Why does the current accommodation not meet the household's needs; and could their needs could be addressed in situ e.g. extra caravans. This could cover people wanting to live with that household but who cannot currently

NOT FOR CIRCULATION

H Bricks & Mortar Contacts

H1 Contacts for Bricks and Mortar interviews? *INTERVIEWER: Please write in*

Details

Quality control

INTERVIEWER: May I also take your name, telephone number and address? ORS may wish to contact you to confirm that this interview took place. These details will only be used for this purpose and will not be passed onto anyone else.

Respondent's Name.....

Respondent's Telephone.....

Respondent's Email.....

INTERVIEWER: Thank you for your time and help completing this questionnaire

INTERVIEWERS DECLARATION:

I certify that I have conducted this interview personally with the person named above in accordance with the Market Research Society Code of Conduct

Interviewers Signature:

Appendix D – Assessment of need for households that do not meet the Planning Definition

It is not now a requirement to include details of need from Gypsies and Travellers that do not meet the planning definition in the GTAA. However for illustrative purposes and to support the Council's wider housing allocations these figures are included.

Analysis of the household interviews for those who do not meet the planning definition indicated that there is a current need for 6 pitches from concealed or doubled-up households or adults, a further need for 6 pitches in the next 5 years for older teenage children, and need from 2 household members living in bricks and mortar (1 current and 1 teenage child in need of a pitch in the next 5 years). Future need is made up of 19 from new household formation using a formation rate of 2.00% that has been derived from the demographics of the households that were interviewed. This gives an overall need for **33 additional pitches** over the GTAA period.

Additional need for Gypsy and Traveller households in York that do not meet the Planning Definition (2016-2032)

Gypsies and Travellers – Not Meeting Planning Definition	Pitches
Supply of Pitches	
Available vacant public and private pitches	0
Unimplemented pitches on new sites	0
Vacated by households moving to bricks and mortar	0
Out-migration	0
Total Supply	**0**
Current Need	
Households on unauthorised developments	0
Households on unauthorised encampments	0
Concealed households/doubling-up/over-crowding	6
Movement from bricks and mortar	2
Households on waiting lists for public sites	0
Total Current Need	**8**
Future Need	
Currently on sites with temporary planning permission	0
5 year need from older teenage children	6
In-migration	0
Net new household formation *(Base number of households 52 and formation rate 2.00%)*	19
Total Future Need	**25**
Net Pitch Need = (Current and Future Need – Total Supply)	**33**

Additional need for Gypsy and Traveller households in York that do not meet the Planning Definition by 5 year periods

Years	0-5	6-10	11-15	16	Total
	2016-21	2021-26	2026-31	2032	
	19	6	7	1	**33**

In order to assist with meeting the need for non-travelling households and the 90% proportion of unknown households the Council requested a breakdown by single year periods. This can be found in the table below.

Addition need by single year periods

Year	Non-Travelling	90% of Unknown	TOTAL
0	7	6	**13**
1	2	0	**2**
2	2	1	**2**
3	3	0	**3**
4	3	0	**2**
5	1	1	**1**
6	1	0	**1**
7	1	0	**1**
8	1	1	**2**
9	1	0	**1**
10	1	0	**1**
11	1	1	**2**
12	1	0	**1**
13	1	0	**1**
14	2	1	**2**
15	2	0	**2**
16	2	0	**2**
TOTAL	**32**	**11**	**44**

Appendix E: Site and Yard Lists (March 2016)

Site/Yard	Authorised Pitches or Plots	Unauthorised Pitches or Plots
Public Sites		
James Street Traveller Site, York	20	-
Osbaldwick Caravan Site, York	18	-
Water Lane Caravan Site, York	23	-
Private Sites with Permanent Permission		
Outgang Lane, York	2	-
Home Lea	2	-
Private Sites with Temporary Permission		
None	-	-
Tolerated Sites – Long-term without Planning Permission		
None	-	-
Unauthorised Developments		
Water Lane Caravan Site, York	-	1
Flaxton	-	5
TOTAL PITCHES	**65**	**6**
Authorised Travelling Showpeople Yards		
None	-	-
Temporary Travelling Showpeople Yards		
The Stables, York	1	-
TOTAL PLOTS	**1**	**0**

Appendix F – ORS Technical Note on Population and Household Growth

Opinion Research Services

Technical Note

Gypsy and Traveller Household Formation and Growth Rates

August 26th 2015

Opinion Research Services
Spin-out company of Swansea University

As with all our studies, this research is subject to Opinion Research Services' Standard Terms and Conditions of Contract.

Any press release or publication of this research requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

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Household Growth Rates

Abstract and conclusions

1. National and local household formation and growth rates are important components of Gypsy and Traveller accommodation assessments, but little detailed work has been done to assess their likely scale. Nonetheless, nationally, a net growth rate of 3% per annum has been commonly assumed and widely used in local assessments – even though there is actually no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically.

2. Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data are unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis (which, of course, is used to assess housing needs in the settled community).

3. The growth in the Gypsy and Traveller population may be as low as 1.25% per annum – a rate which is much less than the 3% per annum often assumed, but still at least four times greater than in the general population. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2% per annum nationally.

4. The often assumed 3% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.5% per annum for Gypsies and Travellers.

5. Some local authorities might perhaps allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller communities, the lower estimate of 1.5% per annum should be used for planning purposes.

Introduction

6. The rate of household growth is a key element in all housing assessments, including Gypsy and Traveller accommodation assessments. Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher *gross* household formation rates. However, while their *gross* rate of household growth might be high, Gypsy and Traveller communities' future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing. Therefore, the *net* rate of household growth is the *gross* rate of formation *minus* any reductions in households due to such factors. Of course, it is the *net* rate that is important in determining future accommodation needs for Gypsies and Travellers.

7. In this context, it is a matter of concern that many Gypsy and Traveller accommodation needs assessments have not distinguished *gross* and *net* growth rates nor provided evidence for their assumed rates of household increase. These deficiencies are particularly important because when assumed growth rates are unrealistically high, and then compounded over a number of planning years, they can yield exaggerated projections of accommodation needs and misdirect public policy. Nonetheless, assessments and guidance documents have assumed 'standard' *net* growth rates of about 3% without sufficiently recognising either the range of factors impacting on the *gross* household growth rates or the implications of unrealistic assumptions when projected forward on a compound basis year by year.

8. For example, in a study for the Office of the Deputy Prime Minister ('Local Authority Gypsy and Traveller Sites in England', 2003), Pat Niner concluded that *net* growth rates as high as 2%-3% per annum should be assumed. Similarly, the Regional Spatial Strategies (RSS) (which continued to be quoted after their abolition was announced in 2010) used *net* growth rates of 3% per annum without providing any evidence to justify the figure (For example, 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England July 2009').

9. However, the guidance of the Department of Communities and Local Government ('Gypsy and Traveller Accommodation Needs Assessments: Guidance', 2007) was much clearer in saying that:

> *The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count.* [In footnote 6, page 25]

10. The guidance emphasises that local information and trends should always be taken into account – because the *gross* rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a *gross* growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting *net* household growth rate that matters for planning purposes in assessing future accommodation needs.

11. The current guidance also recognises that assessments should use local evidence for *net* future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

> *I can confirm that the annual growth rate figure of 3% does not represent national planning policy.*
>
> *The previous Administration's guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority's own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure,'*

12. Therefore, while there are many assessments where a national Gypsy and Traveller household growth rate of 3% per annum has been assumed (on the basis of 'standard' precedent and/or guidance), there is little to justify this position and it conflicts with current planning guidance. In this context, this document seeks to integrate available evidence about *net* household growth rates in order to provide a more robust basis for future assessments.

Compound growth

13. The assumed rate of household growth is crucially important for Gypsy and Traveller studies because for future planning purposes it is projected over time on a compound basis – so errors are progressively enlarged. For example, if an assumed 3% *net* growth rate is compounded each year then the implication is that the number of households will double in only 23.5 years; whereas if a *net* compound rate of 1.5% is used then the doubling of household numbers would take 46.5 years. The table below shows the impact of a range of compound growth rates.

Table 1
Compound Growth Rates and Time Taken for Number of Households to Double

Household Growth Rate per Annum	Time Taken for Household to Double
3.00%	23.5 years
2.75%	25.5 years
2.50%	28 years
2.25%	31 years
2.00%	35 years
1.75%	40 years
1.50%	46.5 years

14. The above analysis is vivid enough, but another illustration of how different rates of household growth impact on total numbers over time is shown in the table below – which uses a baseline of 100 households while applying different compound growth rates over time. After 5 years, the difference between a 1.5% growth rate and a 3% growth rate is only 8 households (116 minus 108); but with a 20-year projection the difference is 46 households (181 minus 135).

Table 2
Growth in Households Over time from a Baseline of 100 Households

Household Growth Rate per Annum	5 years	10 years	15 years	20 years	50 years	100 years
3.00%	116	134	156	181	438	1,922
2.75%	115	131	150	172	388	1,507
2.50%	113	128	145	164	344	1,181
2.25%	112	125	140	156	304	925
2.00%	110	122	135	149	269	724
1.75%	109	119	130	141	238	567
1.50%	108	116	125	135	211	443

15. In summary, the assumed rate of household growth is crucially important because any exaggerations are magnified when the rate is projected over time on a compound basis. As we have shown, when compounded and projected over the years, a 3% annual rate of household growth implies much larger future Gypsy and Traveller accommodation requirements than a 1.5% per annum rate.

Caravan counts

16. Those seeking to demonstrate national Gypsy and Traveller household growth rates of 3% or more per annum have, in some cases, relied on increases in the number of caravans (as reflected in caravan counts) as their evidence. For example, some planning agents have suggested using 5-year trends in the national caravan count as an indication of the general rate of Gypsy and Traveller household growth. For example, the count from July 2008 to July 2013 shows a growth of 19% in the number of caravans on-site – which is equivalent to an average annual compound growth rate of 3.5%. So, *if plausible*, this approach could justify using a 3% or higher annual household growth rate in projections of future needs.

17. However, caravan count data are unreliable and erratic. For example, the July 2013 caravan count was distorted by the inclusion of 1,000 caravans (5% of the total in England) recorded at a Christian event near Weston-Super-Mare in North Somerset. Not only was this only an estimated number, but there were no checks carried out to establish how many caravans were occupied by Gypsies and Travellers. Therefore, the resulting count overstates the Gypsy and Traveller population and also the rate of household growth.

18. ORS has applied the caravan-counting methodology hypothetically to calculate the implied national household growth rates for Gypsies and Travellers over the last 15 years, and the outcomes are shown in the table below. The January 2013 count suggests an average annual growth rate of 1.6% over five years, while the July 2013 count gives an average 5-year rate of 3.5%; likewise a study benchmarked at January 2004 would yield a growth rate of 1%, while one benchmarked at January 2008 would imply a 5% rate of growth. Clearly any model as erratic as this is not appropriate for future planning.

Table 3
National CLG Caravan Count July 1998 to July 2014 with Growth Rates (Source: CLG)

Date	Number of caravans	5 year growth in caravans	Percentage growth over 5 years	Annual over last 5 years.
Jan 2015	20,123	1,735	9.54%	1.84%
July 2014	20,035	2,598	14.90%	2.81%
Jan 2014	19,503	1,638	9.17%	1.77%
July 2013	20,911	3,339	19.00%	3.54%
Jan 2013	19,359	1,515	8.49%	1.64%
Jul 2012	19,261	2,112	12.32%	2.35%
Jan 2012	18,746	2,135	12.85%	2.45%
Jul 2011	18,571	2,258	13.84%	2.63%
Jan 2011	18,383	2,637	16.75%	3.15%
Jul 2010	18,134	2,271	14.32%	2.71%
Jan 2010	18,370	3,001	19.53%	3.63%
Jul 2009	17,437	2,318	15.33%	2.89%
Jan 2009	17,865	3,503	24.39%	4.46%
Jul 2008	17,572	2,872	19.54%	3.63%
Jan 2008	17,844	3,895	27.92%	5.05%

Jul 2007	17,149	2,948	20.76%	3.84%
Jan 2007	16,611	2,893	21.09%	3.90%
Jul 2006	16,313	2,511	18.19%	3.40%
Jan 2006	15,746	2,352	17.56%	3.29%
Jul 2005	15,863	2,098	15.24%	2.88%
Jan 2005	15,369	1,970	14.70%	2.78%
Jul 2004	15,119	2,110	16.22%	3.05%
Jan 2004	14,362	817	6.03%	1.18%
Jul 2003	14,700			
Jan 2003	13,949			
Jul 2002	14,201			
Jan 2002	13,718			
Jul 2001	13,802			
Jan 2001	13,394			
Jul 2000	13,765			
Jan 2000	13,399			
Jan 1999	13,009			
Jul 1998	13,545			

19. The annual rate of growth in the number of caravans varies from slightly over 1% to just over 5% per annum. We would note that if longer time periods are used the figures do become more stable. Over the 36 year period 1979 (the start of the caravan counts) to 2015 the compound growth rate in caravan numbers has been 2.5% per annum.

20. However, there is no reason to assume that these widely varying rates correspond with similar rates of increase in the household population. In fact, the highest rates of caravan growth occurred between 2006 and 2009, when the first wave of Gypsy and Traveller accommodation needs assessments were being undertaken – so it seems plausible that the assessments prompted the inclusion of additional sites and caravans (which may have been there, but not counted previously). Counting caravan numbers is very poor proxy for Gypsy and Traveller household growth. Caravans counted are not always occupied by Gypsy and Traveller families and numbers of caravans held by families may increase generally as affluence and economic conditions improve, (but without a growth in households)

21. There is no reason to believe that the varying rates of increase in the number of caravans are matched by similar growth rates in the household population. The caravan count is not an appropriate planning guide and the only proper way to project future population and household growth is through demographic analysis – which should consider both population and household growth rates. This approach is not appropriate to needs studies for the following reasons:

Modelling population growth

Introduction

22. The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths and in-/out-migration. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context, ORS has modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for

population and household forecasting). To do so, we have supplemented the available national statistical sources with data derived locally (from our own surveys) and in some cases from international research. None of the supplementary data are beyond question, and none will stand alone; but, when taken together they have cumulative force. In any case the approach we adopt is more critically self-aware than simply adopting 'standard' rates on the basis of precedent.

Migration effects

23. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities – but in each case the in-migration to one area is matched by an out-migration from another area. Since it is difficult to estimate the net effect of such movements over local plan periods, ORS normally assumes that there will be nil net migration to/from an area. Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects.

Population profile

24. The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. In some cases the data can be supplemented by ORS's own household survey data which is derived from more than 2,000 face-to-face interviews with Gypsies and Travellers since 2012. The ethnicity question in the 2011 census included for the first time 'Gypsy and Irish Traveller' as a specific category. While non-response bias probably means that the size of the population was underestimated, the age profile the census provides is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.

25. The age profile is important, as the table below (derived from census data) shows. Even assuming zero deaths in the population, achieving an annual population growth of 3% (that is, doubling in size every 23.5 years) would require half of the "year one" population to be aged under 23.5 years. When deaths are accounted for (at a rate of 0.5% per annum), to achieve the same rate of growth, a population of Gypsies and Travellers would need about half its members to be aged under 16 years. In fact, though, the 2011 census shows that the midway age point for the national Gypsy and Traveller population is 26 years – so the population could not possibly double in 23.5 years.

Table 4
Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

Age Group	Number of People	Cumulative Percentage
Age 0 to 4	5,725	10.4
Age 5 to 7	3,219	16.3
Age 8 to 9	2,006	19.9
Age 10 to 14	5,431	29.8
Age 15	1,089	31.8
Age 16 to 17	2,145	35.7
Age 18 to 19	1,750	38.9

Age 20 to 24	4,464	47.1
Age 25 to 29	4,189	54.7
Age 30 to 34	3,833	61.7
Age 35 to 39	3,779	68.5
Age 40 to 44	3,828	75.5
Age 45 to 49	3,547	82.0
Age 50 to 54	2,811	87.1
Age 55 to 59	2,074	90.9
Age 60 to 64	1,758	94.1
Age 65 to 69	1,215	96.3
Age 70 to 74	905	97.9
Age 75 to 79	594	99.0
Age 80 to 84	303	99.6
Age 85 and over	230	100.0

Birth and fertility rates

26. The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population – which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year. (Deaths during infancy will have minimal impact within the early age groups, so the data provides the best basis for estimating of the birth rate for the Gypsy and Traveller population.)

27. The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood. We know of only one estimate of the fertility rates of the UK Gypsy and Traveller community. This is contained in the book, 'Ethnic identity and inequalities in Britain: The dynamics of diversity' by Dr Stephen Jivraj and Professor Ludi Simpson published in May 2015. This draws on the 2011 Census data and provides an estimated total fertility rate of 2.75 for the Gypsy and traveller community

28. ORS's have been able to examine our own survey data to investigate the fertility rate of Gypsy and Traveller women. The ORS data shows that, on average, Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). On this basis it is reasonable to assume an average of three children per woman during her lifetime which would be consistent with the evidence from the 2011 Census of a figure of around 2.75 children per woman. In any case, the TFR for women aged 24 years is 1.5 children, which is significantly short of the number needed to double the population in 23.5 years – and therefore certainly implies a net growth rate of less than 3% per annum.

Death rates

29. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account – which means that the *net* population growth cannot conceivably achieve 2% per

annum. In England and Wales there are nearly half-a-million deaths each year – about 0.85% of the total population of 56.1 million in 2011. If this death rate is applied to the Gypsy and Traveller community then the resulting projected growth rate is in the region of 1.15%-1.25% per annum.

30. However, the Gypsy and Traveller population is significantly younger than average and may be expected to have a lower percentage death rate overall (even though a smaller than average proportion of the population lives beyond 68 to 70 years). While there can be no certainty, an assumed death rate of around 0.5% to 0.6% per annum would imply a net population growth rate of around 1.5% per annum.

31. Even though the population is younger and has a lower death rate than average, Gypsies and Travellers are less likely than average to live beyond 68 to 70 years. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) 'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative', University of Sheffield). Therefore, in our population growth modelling we have used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 census (and also in ORS's own survey data). On the basis of the Sheffield study, we could have supposed a life expectancy of only 68, but we have been cautious in our approach.

Modelling outputs

32. If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum (well below the 3% per annum often assumed). If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.5% per annum. To generate an 'upper range' rate of population growth, we have assumed a TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.9% per annum. We should note, though, that national TFR rates of 4 are currently found only in sub-Saharan Africa and Afghanistan, so it is an implausible assumption.

33. There are indications that these modelling outputs are well founded. For example, in the ONS's 2012-based Sub-National Population Projections the projected population growth rate for England to 2037 is 0.6% per annum, of which 60% is due to natural change and 40% due to migration. Therefore, the natural population growth rate for England is almost exactly 0.35% per annum – meaning that our estimate of the Gypsy and Traveller population growth rate is four times greater than that of the general population of England.

34. The ORS Gypsy and Traveller findings are also supported by data for comparable populations around the world. As noted, on the basis of sophisticated analysis, Hungary is planning for its Roma population to grow at around 2.0% per annum, but the underlying demographic growth is typically closer to 1.5% per annum. The World Bank estimates that the populations of Bolivia, Cambodia, Egypt, Malaysia, Pakistan, Paraguay, Philippines and Venezuela (countries with high birth rates and improving life expectancy) all show population growth rates of around 1.7% per annum. Therefore, in the context of national data, ORS's modelling and plausible international comparisons, it is implausible to assume a net 3% annual growth rate for the Gypsy and Traveller population.

Household growth

35. In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller (childless or single person) households (including, of course, older people (following divorce or as surviving partners)). Based on such factors, the CLG 2012-based projections convert current population data to a projected household growth rate of 0.85% per annum (compared with a population growth rate of 0.6% per annum).

36. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.5% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households form. However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.

37. Based on the 2011 census, the table below compares the age of household representatives in English households with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general English population 3.6% of household representatives are aged 16-24, compared with 8.7% in the Gypsy and Traveller population. Because the census includes both housed and on-site Gypsies and Travellers without differentiation, it is not possible to know if there are different formation rates on sites and in housing. However, ORS's survey data (for sites in areas such as Central Bedfordshire, Cheshire, Essex, Gloucestershire and a number of authorities in Hertfordshire) shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 5
Age of Head of Household (Source: UK Census of Population 2011)

Age of household representative	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Age 24 and under	790,974	3.6%	1,698	8.7%
Age 25 to 34	3,158,258	14.3%	4,232	21.7%
Age 35 to 49	6,563,651	29.7%	6,899	35.5%
Age 50 to 64	5,828,761	26.4%	4,310	22.2%
Age 65 to 74	2,764,474	12.5%	1,473	7.6%
Age 75 to 84	2,097,807	9.5%	682	3.5%
Age 85 and over	859,443	3.9%	164	0.8%
Total	22,063,368	100%	19,458	100%

38. The following table shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents, fewer couples without children, and fewer households with non-dependent children amongst Gypsies and Travellers. This data suggest that Gypsy and Traveller households form at an earlier age than the general population.

Table 6
Household Type (Source: UK Census of Population 2011)

Household Type	All households in England		Gypsy and Traveller households in England	
	Number of households	Percentage of households	Number of households	Percentage of households
Single person	6,666,493	30.3%	5,741	29.5%
Couple with no children	5,681,847	25.7%	2345	12.1%
Couple with dependent children	4,266,670	19.3%	3683	18.9%
Couple with non-dependent children	1,342,841	6.1%	822	4.2%
Lone parent: Dependent children	1,573,255	7.1%	3,949	20.3%
Lone parent: All children non-dependent	766,569	3.5%	795	4.1%
Other households	1,765,693	8.0%	2,123	10.9%
Total	22,063,368	100%	19,458	100%

39. ORS's own site survey data is broadly compatible with the data above. We have found that: around 50% of pitches have dependent children compared with 45% in the census; there is a high proportion of lone parents; and about a fifth of Gypsy and Traveller households appear to be single person households. One possible explanation for the census finding a higher proportion of single person households than the ORS surveys is that many older households are living in bricks and mortar housing (perhaps for health-related reasons).

40. ORS's on-site surveys have also found more female than male residents. It is possible that some single person households were men linked to lone parent females and unwilling to take part in the surveys. A further possible factor is that at any time about 10% of the male Gypsy and Traveller population is in prison – an inference drawn from the fact that about 5% of the male prison population identify themselves as Gypsies and Travellers ('People in Prison: Gypsies, Romany and Travellers', Her Majesty's Inspectorate of Prisons, February 2004) – which implies that around 4,000 Gypsies and Travellers are in prison. Given that almost all of the 4,000 people are male and that there are around 200,000 Gypsies and Travellers in total, this equates to about 4% of the total male population, but closer to 10% of the adult male population.

41. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While there are differences with the general population, a 1.5% per annum Gypsy and Traveller population

growth rate is likely to lead to a household growth rate of 1.5% per annum – more than the 0.85% for the English population as a whole, but much less than the often assumed 3% rate for Gypsies and Travellers.

Household dissolution rates

42. Finally, consideration of household dissolution rates also suggests that the net household growth rate for Gypsies and Travellers is very unlikely to reach 3% per annum (as often assumed). The table below, derived from ORS's mainstream strategic housing market assessments, shows that generally household dissolution rates are between 1.0% and 1.7% per annum. London is different because people tend to move out upon retirement, rather than remaining in London until death. To adopt a 1.0% dissolution rate as a standard guide nationally would be too low, because it means that average households will live for 70 years after formation. A 1.5% dissolution rate would be a more plausible as a national guide, implying that average households live for 47 years after formation.

Table 7
Annual Dissolution Rates (Source: SHMAs undertaken by ORS)

Area	Annual projected household dissolution	Number of households	Percentage
Greater London	25,000	3,266,173	0.77%
Blaenau Gwent	468.2	30,416	1.54%
Bradford	3,355	199,296	1.68%
Ceredigion	348	31,562	1.10%
Exeter, East Devon, Mid Devon, Teignbridge and Torbay	4,318	254,084	1.70%
Neath Port Talbot	1,352	57,609	2.34%
Norwich, South Norfolk and Broadland	1,626	166,464	0.98%
Suffolk Coastal	633	53,558	1.18%
Monmouthshire Newport Torfaen	1,420	137,929	1.03%

43. The 1.5% dissolution rate is important because the death rate is a key factor in moderating the *gross* household growth rate. Significantly, applying a 1.5% dissolution rate to a 3% *gross* household growth formation rate yields a *net* rate of 1.5% per annum – which ORS considers is a realistic figure for the Gypsy and Traveller population and which is in line with other demographic information. After all, based on the dissolution rate, a *net* household formation rate of 3% per annum would require a 4.5% per annum *gross* formation rate (which in turn would require extremely unrealistic assumptions about birth rates).

Summary conclusions

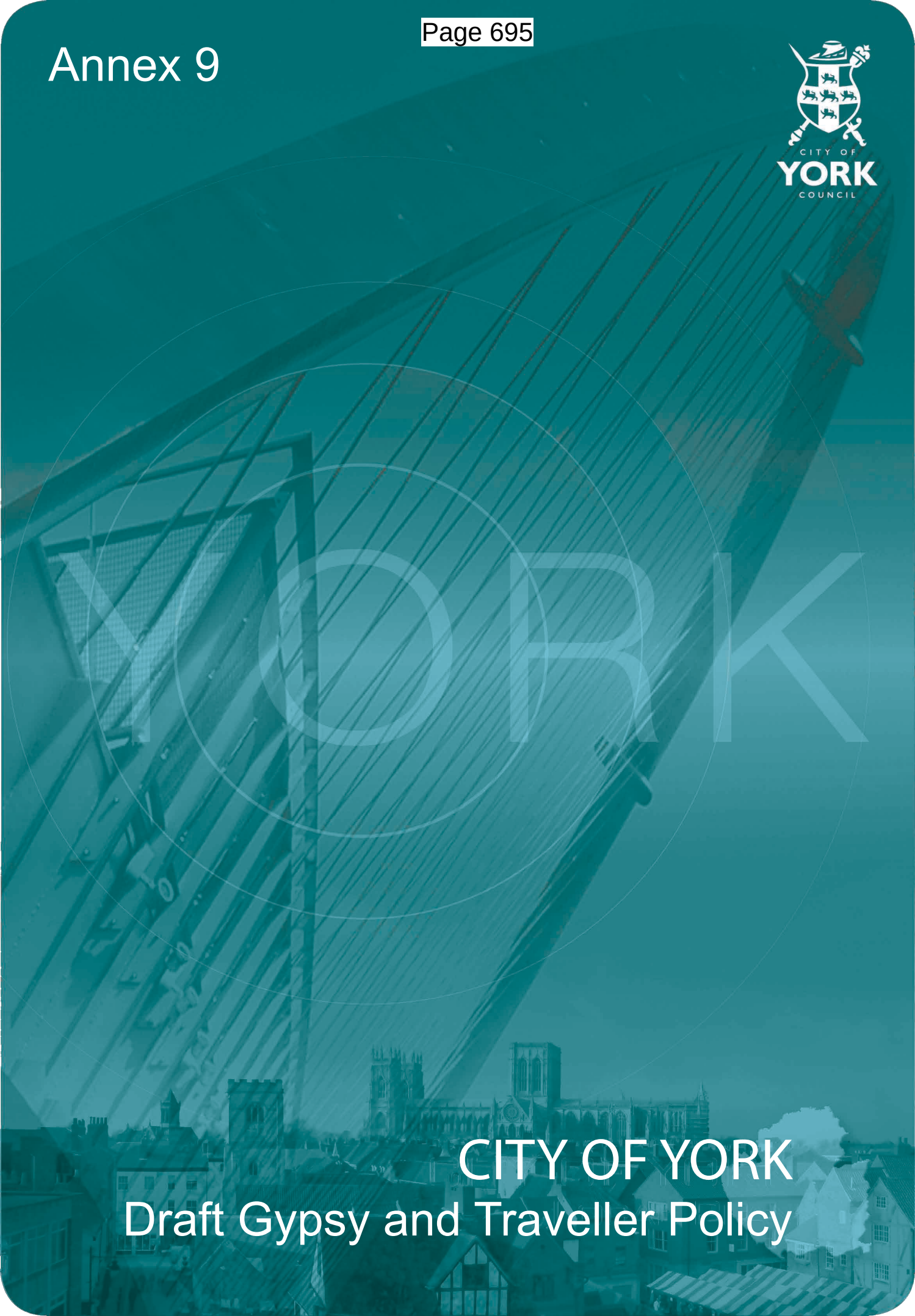
44. Future Gypsy and Traveller accommodation needs have typically been over-estimated because population and household growth rates have been projected on the basis of assumed 3% per annum net growth rates.

45. Unreliable caravan counts have been used to support the supposed growth rate, but there is no reason to suppose that the rate of increase in caravans corresponds to the annual growth of the Gypsy and Traveller population or households.

46. The growth of the national Gypsy and Traveller population may be as low as 1.25% per annum – which is still four times greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that the net national Gypsy and Traveller population and household growth is above 2% per annum nationally. The often assumed 3% net household growth rate per annum for Gypsies and Travellers is unrealistic.

47. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.5% per annum. The often assumed 3% per annum net rate is unrealistic. Some local authorities might allow for a household growth rate of up to 2.5% per annum, to provide a 'margin' if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.5% per annum should be used.

Annex 9



CITY OF YORK
Draft Gypsy and Traveller Policy

Gypsies, Travellers and Showpeople

There is a total need of 47 Gypsy and Traveller pitches over the plan period. This is split into 26 pitches in years 2016-21, 9 pitches in the period 2021-26, 10 pitches in the period 2026-31 and 2 in 2032. Of these 47, 3 households meet the updated planning definition introduced through the Planning Policy for Travellers Sites (2015) and 44 do not meet this definition.

Policy H5: Gypsies and Travellers

Safeguarding Existing Supply

Proposals which fail to protect existing Gypsy and Traveller sites or involve a loss of pitches/plots will not be permitted unless it can be demonstrated that they are no longer required or equivalent alternative provision can be made. Existing Gypsy and Traveller sites are shown on the proposals map, and are listed below:

- James Street, Layerthorpe;
- Water Lane, Clifton; and
- Outgang Lane, Osbaldwick;

Meeting Future Need

In order to meet the accommodation needs of Gypsies and Travellers, provision will be made in the following ways:

a) Within Existing Local Authority sites

In order to meet the need of Gypsies and Travellers that meet the planning definition, 3 additional pitches will be identified within the existing three Local Authority sites.

b) Within Strategic Allocations

In order to meet the need of those 44 Gypsies and Traveller households that do not meet the Planning definition:

Applications for larger development sites of 5 ha or more will be required to:

- provide a number of pitches within the site; or
- provide alterative land that meets the criteria set out in part (c) of this policy to accommodate the required number of pitches; or
- provide commuted sum payments to contribute towards to development of pitches elsewhere.

The calculations for this policy will be based on the hierarchy below:

100-499 dwellings - 2 pitches should be provided
500-999 dwellings - 3 pitches should be provided
1000-1499 dwellings - 4 pitches should be provided

1500-1999 dwellings - 5 pitches should be provided
2000 or more dwellings - 6 pitches should be provided

Section XX contains site specific policies for the strategic sites including the delivery of the requirements above.

c) Planning applications

In addition to the above allocated sites, development for Gypsy and Traveller sites will be permitted where proposals:

i. do not conflict with the objective of conserving and enhance York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;
ii. ensure accessibility to public transport and services;
iii. are suitable in terms of vehicular access and road safety including internal space for adequate parking and turning;
iv. ensure that development does not lead to unacceptable levels of congestion, pollution, and air quality for surrounding residents and future occupiers; and
v. appropriately manage flood risk.

In addition, proposals will be expected to:

vi. provide adequate provision for storage, recreation space, amenity provision and utility services;
vii. ensure that the size and density of pitches/plots are in accordance with best practice guidance;
viii. incorporate appropriate landscape proposals to have a positive influence on the quality and amenity of the development;
ix. ensure that residents living nearby are not unduly affected by noise, disturbance or overlooking; and
x. ensure future occupiers would not be subject to significant adverse environmental impacts.

Any permission granted for a Gypsy and Traveller development will be subject to a condition limiting occupation to Gypsies and Travellers, as appropriate.

Policy H6: Travelling Showpeople

Safeguarding Existing Supply

Proposals which fail to protect existing Travelling Showpeople yards or involve a loss of pitches/plots will not be permitted unless it can be demonstrated that they are no longer required or equivalent alternative provision can be made. Existing Travelling Showman yards are shown on the proposals map, and are listed below:

- The Stables, Elvington (temporary permission until 2020);

Meeting Future Need

There is a total need of 3 Showpeople plots over the plan period (this includes the plot with temporary planning permission at The Stables). This is split into 2 plots in years 2016-21, and 1 plot in the period 2032.

a) Allocated Sites

In order to meet the need of Travelling Showpeople that meet the planning definition, 3 plots will be allocated on the following site:

The Stables, Elvington: 3 plots

b) Travelling Showpeople Yards within Employment Sites

Travelling Showpeople yards will be permitted on existing and allocated employment sites provided development would not lead to the loss of land that that is necessary to meet both immediate and longer term requirements over the plan period in both quantative and qualitative terms and unacceptable environmental problems exist.

b) Planning applications

In addition to the above allocated sites, development for Showman sites will be permitted where proposals:

i. do not conflict with the objective of conserving and enhance York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;
ii. ensure accessibility to public transport and services;
iii. are suitable in terms of vehicular access and road safety including internal space for adequate parking and turning;
iv. ensure that development does not lead to unacceptable levels of congestion, pollution, and air quality for surrounding residents and future occupiers; and
v. appropriately manage flood risk.

In addition, proposals will be expected to:

vi. provide adequate provision for storage, recreation space, amenity provision and utility services;
vii. ensure that the size and density of pitches/plots are in accordance with best practice guidance;
viii. incorporate appropriate landscape proposals to have a positive influence on the quality and amenity of the development;
ix. ensure that residents living nearby are not unduly affected by noise, disturbance or overlooking; and
x. ensure future occupiers would not be subject to significant adverse environmental impacts.

Any permission granted for a Travelling Showpeople development will be subject to a condition limiting occupation to Travelling Showpeople, as appropriate.

E x p l a n a t i o n

Key evidence including the Equality and Human Rights Commission report Inequalities Experienced by Gypsy and Traveller Communities (2009) suggests that today Gypsies and Travellers are the most marginalised and disadvantaged of all minority groups nationally, suffering the greatest inequalities across a range of indicators.

Planning Policy for Traveller Sites (2015) introduced a revised definition for Travellers which states that households that do not travel for work purposes fall outside the planning definition of a Traveller. In light of the revised definition, the Council commissioned consultants to undertake an update of the Gypsy, Traveller, and Showpeople Accommodation Assessment (2013). As part of this update, Gypsy, Traveller and Showpeople households completed as revised survey which could be used to analyse their travel patterns and to conclude whether or not they fall into the revised definition of Travellers.

Table 5.3 below is taken from the Gypsy, Travellers and Showpeople Accommodation Assessment Update (2017) and summarises the number of households in York which do/do not meet the definition.

Table 5.3

Households in York	GTAA[1]	SHMA[2]	Total
Households that meet the Planning definition (incl. 10% of unknown need)	3	0	3
Households that do not meet the Planning Definition (incl. 90% of unknown need)	0	44	44
Total	3	44	47

Showpeople households that meet the Planning definition	3	0	3
Total	**3**	**0**	**3**

In accordance with Government guidance set out in the NPPF (2012) and Planning Policy for Traveller Sites (2015), the Council is required to identify a supply of specific, deliverable Gypsy, Traveller and Travelling Showpeople sites sufficient to provide five years' worth of sites against their locally set targets to meet accommodation needs of these groups who meet the revised definition in York.

[1] GTAA – Gypsy and Traveller Accommodation Assessment
[2] SHMA – Strategic Housing Market Assessment

It is recognised that Gypsies and Travellers and Travelling Showpeople have different needs and that the two different groups should not be located on the same areas of land. Gypsy and Traveller and Travelling Showpeople provision has its own specific terminology. Gypsy and Traveller provision is expressed in 'pitches' on sites whereas Travelling Showpeople provision is expressed as 'plots' on sites often called a 'yard'. Nationally, pitch/plot sizes range from 200 m^2 to 500 m^2. An upper measurement of 500 m^2 has been used in the allocation of sites to allow final design to accommodate all of the requirements set out in design guidance, including landscaping, play space and access arrangements. Space has also been taken into account for equine grazing which is a much needed provision in York. Final pitch sizes will ultimately be a matter for detailed planning applications to determine.

Two plots for Travelling Showpeople has been identified for the first 5 years of the plan period at The Stables, Elvington, with a further 1 plot in the same yard for the future expansion of the existing family in year. The nature of Travelling Showpeople's work, requires level hard standings and covered sheds for the maintenance and storage of large fairground rides. For this reason, applications for yards in existing and allocated employment sites will be supported where the provision will not compromise the employment land supply.

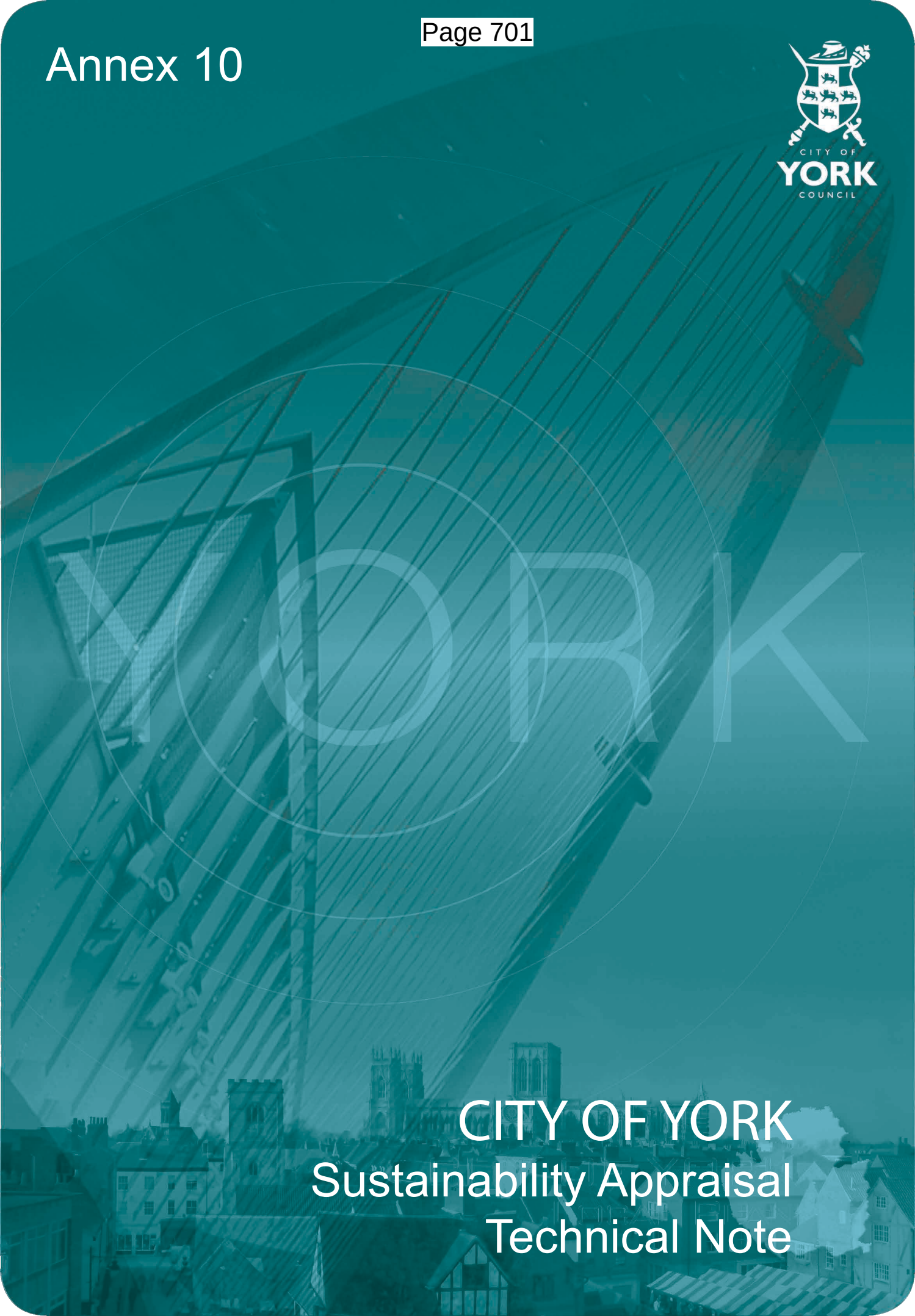
The suitability of the location of any further sites for Gypsies, Travellers or Travelling Showpeople which come forward during the plan period will be determined in accordance with criteria i - v of Policies H5 and H6. These consider the natural and historic environment, access to public transport and services, road access and congestion, and flood risk. The development of the allocated sites and any further sites that come forward during the plan period will be determined in accordance with Policies H5 and H6 criteria vi – x. These consider the provision of storage and recreation space, amenity provision, size and density of pitches/plots, landscaping of the site, amenity of nearby residents and future occupiers of the site.

A condition will be attached to any permission to ensure that the sites remain in use by Gypsies and Travellers or Travelling Showpeople, as appropriate and the number of pitches and plots are retained to ensure a supply to need demand.

D e l i v e r y

- Key Delivery Partners: City of York Council, Developers, Housing Charities, Gypsy, Roma, Traveller and Travelling Showpeople stakeholders
- Implementation: Planning applications and strategic site masterplans

Annex 10



CITY OF YORK
Sustainability Appraisal
Technical Note

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Technical note:
City of York Council Local Plan

1. Introduction

Background

1.1.1 Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) is providing support to City of York Council to assist with the preparation of a Sustainability Appraisal (SA) of their Local Plan. Amec Foster Wheeler has been assisting the City Council with the preparation of SA since the Council consulted on its Local Plan Preferred Options in June 2013. Following this, Amec Foster Wheeler in conjunction with the Council prepared a SA Report and Habitat Regulations Assessment (HRA) Report to accompany a Publication Draft of the Local Plan in September 2014.

1.1.2 The 2014 Publication Draft Local Plan set out the Council's vision for York out to 2030 and provided the spatial planning response to the challenge of growth. It was developed taking into account national planning policy and guidance, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base studies and the outcomes of engagement. The Publication Draft Local Plan also utilised the Local Development Framework (LDF) Core Strategy, which was withdrawn in 2012 following the publication of the National Planning Policy Framework (NPPF) and the (partial) revocation of the Regional Strategy (the Yorkshire and Humber Plan)[1] in order to produce a local plan compliant with new national planning policy. However, a decision was taken by Full Council in October 2014 which halted proceeding to the Publication Draft consultation whilst further work was undertaken to understand York's housing requirements.

1.1.3 Since 2014, the City of York has been updating its Local Plan evidence base. During summer 2016 the Council undertook a Preferred Sites Consultation which set out the Council's preferred site allocations alongside updated technical work underpinning housing and employment growth. This was accompanied by an interim SA which provided commentary on the performance of sites against the SA Objectives.

1.1.4 The next stage, following confirmation of the levels of housing and employment growth for the city, will be to proceed with the preparation and consultation on a Draft Local Plan during summer 2017.

The Requirement to Prepare a Local Plan

1.1.5 The National Planning Policy Framework (NPPF) (March, 2012)[2] sets out (at paragraphs 150-157) that each local planning authority should prepare a local plan for its area. Local plans should set out the strategic priorities and policies to deliver:

[1] Statutory Instrument 2013 No. 117 *Town and Country Planning, England The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013*.
[2] Department for Communities and Local Government (2012) *National Planning Policy Framework*. Available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf [Accessed June 2017].

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- The homes and jobs needed in the area;
- The provision of retail, leisure and other commercial development;
- The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- The provision of health, security, community and cultural infrastructure and other local facilities; and
- Climate change mitigation and adaptation and conservation and enhancement of the natural and historic environment, including landscape.

1.1.6 Planning Practice Guidance (2014)[3] clarifies (at paragraph 002 'Local Plans') that local plans "should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered".

2. Purpose

2.1.1 Paragraph 6 of the NPPF reiterates the requirements of section 39 (2) of the Planning and Compulsory Purchase Act 2004:

"The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system."

2.1.2 NPPF Paragraph 151 states that:

"*Local Plans must be prepared with the objective of contributing to the achievement of sustainable development*".

2.1.3 In consequence, in order to meet the statutory and national planning policy requirements, it is essential that the City of York Local Plan contributes to a sustainable future for the plan area. To support this objective, the Council is required to carry out a SA of the Local Plan[4]. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised. It also incorporates a process set out under a European Directive[5] and the related UK regulations[6] called Strategic Environmental Assessment (SEA).

2.1.4 SA (including SEA) has been undertaken at all of the key stages in the development of the City of York Local Plan.

2.1.5 The Executive Briefing Paper provides an update regarding the evidence base relating to housing and employment growth for the City and identifies the findings from the Local Plan Site Selection process relating to the MoD sites which came forward following the Preferred Site Consultation during summer 2016.[7]

2.1.6 In order to support discussion on the level of housing and employment growth in the Executive Briefing Paper, an SA has been undertaken of the overall spatial strategy (drawing on the SA which accompanied the 2014 Publication Draft Local Plan) and housing and employment growth recommendations along with a high level appraisal on the proposed spatial distribution of the strategic sites.

2.1.7 This Technical Report presents the findings of the SA.

[3] Department for Communities and Local Government (2014) *Planning Practice Guidance*. Available from http://planningguidance.planningportal.gov.uk/ [Accessed June 2017].
[4] The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.
[5] Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.
[6] Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).
[7] Following the conclusion of the 2016 Local Plan Preferred Sites Consultation the MOD announced the release of three sites in York – Imphal Barracks, Fulford Road and Queen Elizabeth Barracks and Towthorpe Lines.

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2.1.8 This SA work, when included in a SA Report to accompany the Draft Local Plan, will enable the Council to demonstrate that the 'plan' and reasonable alternatives to the overall spatial strategy in terms of the scale and distribution of development have been appraised consistent with the requirements of Article 5(1) of the SEA Directive and Section 12 (2) of the SEA Regulations and ensure that SA case law[8] requirements regarding "an equal examination of the alternatives" have been addressed.

2.1.9 As outlined within the Executive Briefing Paper, until a decision is reached regarding the level of growth for York, no assessment has been made with regard to individual sites. It is envisaged that such an assessment will be undertaken and published within an Interim SA Report alongside a Draft Local Plan during summer 2017.

2.1.10 The remainder of this technical note is structured as follows:

- Section 3 provides an overview of the requirement for SA;
- Section 4 outlines the methodology which has been adopted;
- Section 5 provides a summary of the effects which have been appraised, including the appraisal matrices for the housing figures based upon baseline data from DCLG and figures recommended by GL Hearn. An appraisal of the growth options for employment land has also been undertaken;
- Section 6 contains conclusions and recommendations.

3. Sustainability Appraisal

The Requirement for Sustainability Appraisal

3.1.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of the SEA Directive[9], and the related UK regulations[10].

3.1.2 The SEA Directive and related UK regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is "*to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuing that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.*"

3.1.3 At paragraphs 150-151, the NPPF sets out that local plans are key to delivering sustainable development and that they must be prepared with the objective of contributing to the achievement of sustainable development. Paragraph 165 reiterates the requirement for SA/SEA as it relates to local plan preparation:

"*A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.*"

3.1.4 The Planning Practice Guidance also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is "justified", a key test of soundness that

[8] Para 71 of Heard v Broadland District Council & Ors [2012] EWHC 344 (Admin)
[9] Available from http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32001L0042&from=EN [Accessed June 2017].
[10] Statutory Instrument 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations 2004*. Available from http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi_20041633_en.pdf [Accessed June 2017].

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concerns the extent to which the plan is the most appropriate strategy, when considered against the reasonable alternatives and available and proportionate evidence.

3.1.5 In this context, SA is an integral part of the preparation of the Local Plan for the City of York. SA of the Local Plan will help to ensure that the likely social, economic and environmental effects of the Plan are identified, described and appraised. Where negative effects are identified, measures will be proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures will be considered that could enhance such effects.

Sustainability Appraisal of the City of York Local Plan

3.1.6 The development of the 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. SA has also been an integral part of the development of the Local Plan from the earliest stage of Core Strategy preparation.

3.1.7 Specifically, SAs have been undertaken of the following local plan documents:

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

3.1.8 The approach to the appraisal of the Local Plan (including the SA framework and objectives) is based on the methodology described in the SA Scoping Report (2013).

4. Methodology

4.1.1 This section outlines the methodology used to appraise the spatial strategy, the housing and employment growth options proposed for the City of York and the proposed spatial distribution of the proposed strategic sites. The SA objectives used for this appraisal are consistent with those developed to appraise the draft Local Plan (including the 2014 Publication Draft Local Plan) and were consulted upon in the 2013 Scoping Report. They reflect a review of relevant plans and programmes, an analysis of socio-economic and environmental baseline conditions and the subsequent identification of key sustainability issues.

4.1.2 Establishing appropriate objectives and guide questions is central to appraising the sustainability effects of the draft Local Plan. Broadly, SA objectives present the preferred sustainability outcome which usually involves minimising detrimental effects and enhancing positive ones. The SA process considers the contribution of the plan, vision, outcomes and individual policies and allocations towards each of the appraisal objectives.

4.1.3 **Table 4.1** presents the SA objectives and the key questions/guidance relating to each of the objectives used in the appraisal. The SEA Directive topic(s) to which each of the SA objectives relates is included in the third column.

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Table 4.1 The SA Framework

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
1. To meet the diverse housing needs of the population in a sustainable way.	• Deliver homes to meet the needs of the population in terms of quantity, quality • Promote improvements to the existing and future housing stock • Locate sites in areas of known housing need • Deliver community facilities for the needs of the population • Deliver pitches required for Gypsies and Travellers and Showpeople	Population
2. Improve the health and wellbeing of York's population	• Avoid locating development where environmental circumstances could negatively impact on people's health • Improve access to open space / multi-functional open space • Promotes a healthier lifestyle though access to leisure opportunities (walking /cycling) • Improves access to healthcare • Provides or promotes safety and security for residents • Ensure that land contamination/pollution does not pose unacceptable risks to health	Population, Human Health
3. Improve education, skills development and training for an effective workforce	• Provide good education and training opportunities for all • Support existing higher and further educational establishments for continued success • Provide good quality employment opportunities available to all	Population
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	• Help deliver conditions for business success and investment • Deliver a flexible and relevant workforce for the future • Deliver and promote stable economic growth • Enhance the city centre and its opportunities for business and leisure • Provide the appropriate infrastructure for economic growth • Support existing employment drivers • Promote a low carbon economy	Population
5. Help deliver equality and access to all	• Address existing imbalances of equality, deprivation and exclusion across the city • Provide accessible services and facilities for the local population • Provide affordable housing to meet demand • Help reduce homelessness • Promote the safety and security for people and/or property	Population, Human Health
6. Reduce the need to travel and deliver a sustainable integrated transport network	• Deliver development where it is accessible by public transport, walking and cycling to minimise the use of the car • Deliver transport infrastructure which supports sustainable travel options • Promote sustainable forms of travel • Improve congestion	Air, Climatic Factors
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	• Reduce or mitigate greenhouse gas emissions from all sources • Plan or implement adaptation measures for the likely effects of climate change • Provide and develop energy from renewable, low and zero carbon technologies • Promote sustainable design and building materials that manage the future risks and consequences of climate change • Adhere to the principles of the energy hierarchy	Climatic Factors
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	• Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs • Protect and enhance locally important nature conservation sites (SINCs)	Biodiversity, Flora & Fauna, Human Health

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SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
	• Create new areas or site of bio-diversity / geodiversity value • Improve connectivity of green infrastructure and the natural environment • Provide opportunities for people to access the natural environment	
9. Use land resources efficiently and safeguard their quality	• Re-use previously developed land • Prevent pollution contaminating the land and remediate any existing contamination • Safeguard soil quality, including the best and most versatile agricultural land • Protect or enhance allotments • Safeguard mineral resources and encourage their efficient use	Soil, Material Assets
10. Improve water efficiency and quality	• Conserve water resources and quality; • Improve the quality of rivers and groundwaters	Water
11. Reduce waste generation and increase level of reuse and recycling	• Promote reduction, re-use, recovery and recycling of waste • Promote and increase resource efficiency	Material Assets
12. Improve air quality	• Reduce all emissions to air from current activities • Minimise and mitigate emissions to air from new development (including reducing transport emissions through low emission technologies and fuels) • Support the development of city wide low emission infrastructure; • Improve air quality in AQMAs and prevent new designations; • Avoid locating development where it could negatively impact on air quality • Avoid locating development in areas of existing poor air quality where it could result in negative impacts on the health of future occupants/users • Promote sustainable and integrated transport network to minimise the use of the car	Air, Human Health
13. Minimise flood risk and reduce the impact of flooding to people and property in York	• Reduce risk of flooding • Ensure development location and design does not negatively impact on flood risk • Deliver or incorporate through design sustainable urban drainage systems (SUDs)	Climatic Factors, Water
14. Conserve or enhance York's historic environment, cultural heritage, character and setting	• Preserve or enhance the special character and setting of the historic city • Promote or enhance local culture • Preserve or enhance designated and non-designated heritage assets and their setting • Preserve or enhance those elements which contribute to the 6 Principle Characteristics of the City as identified in the Heritage Topic Paper	Cultural Heritage, Landscape
15. Protect and enhance York's natural and built landscape	• Preserve or enhance the landscape including areas of landscape value • Protect or enhance geologically important sites; • Promote high quality design in context with its urban and rural landscape and in line with the "landscape and Setting" within the Heritage Topic Paper	Cultural Heritage, Landscape

4.1.4 **Table 4.2** shows the extent to which the SA objectives encompass the range of issues identified in the SEA Directive.

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Table 4.2 The SA Objectives Compared Against the SEA Directive Topics

SEA Directive Topic	SA Objective
Biodiversity	8
Population *	1, 2, 3, 4, 5
Human Health	2, 12
Fauna	8
Flora	8
Soil	9
Water	10, 13
Air	6, 12
Climatic Factors	6, 7, 13
Material Assets *	9, 11
Cultural Heritage including architectural and archaeological	14, 15
Landscape	14, 15

* These terms are not clearly defined in the SEA Directive.

4.1.5 For each growth option / strategy, an overall 'score' has been provided against each SA objective, according to the scoring system in **Table 4.3**.

Table 4.3 Scoring System Used in the SA of Sites

Score	Description	Symbol
Significant Positive Effect	The proposed option contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option does not have any effect on the achievement of the objective.	0
Minor Negative Effect	The proposed option detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option detracts significantly from the achievement of the objective.	--
Uncertain	The proposed option has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an assessment to be made.	?

5. Appraisal

5.1 Spatial Strategy

5.1.1 The Spatial Strategy for the City of York was defined in the 2014 Publication Draft Local Plan and comprised of the following policies:

- SS1: Delivering Sustainable Growth for York which identified the need to provide sufficient land to accommodate over 13,500 new jobs and to provide a minimum annual provision of 996 new dwellings over the plan period (with 1,170 delivered over the first five years of the plan period);

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- SS2: The Role of York's Green Belt;
- SS3: The Creation of an Enduring Green Belt;
- SS4: York City Centre;
- Policies SS5-SS10 contained site specific policies relating to; Whinthorpe; East of Metcalf Lane; Clifton Gate; Land North of Monks Cross; York Central and Castle Piccadilly.

5.1.2 Following the decision by Full Council, the housing and employment numbers in SS1 have been subject to further consideration and revision. Similarly those site specific policies relating to Strategic Sites, namely SS5-SS10, will also be been subject to revision and amendment.

5.1.3 However, the focus of the strategy "*to promote sustainable patterns of growth by prioritising development within and/or as an extension to the urban area and through the provision of a single new settlement*" will endure and is expected to form the basis of the 2017 Draft Local Plan.

5.1.4 The SA of the Spatial Strategy Policies contained within the 2014 Publication Draft Local Plan concluded that the scale of provision meant that a range of housing could be provided (particularly affordable housing) to meet the objectively assessed housing needs of the City. This would build strong, sustainable communities by addressing the housing and community needs of York's current and future population, including that arising from economic and institutional growth. This was assessed as having a significant positive effect on SA Objective 1 (Housing).

5.1.5 Taken together, the spatial strategy policies were expected to enhance the health and wellbeing of York's population through:

- The provision of new high quality housing;
- Preventing unacceptable pollution;
- The promotion of sustainable transport; and
- The protection and enhancement of access to open space (formal and informal).

5.1.6 This would be achieved at a City-wide scale and in relation to strategic sites, where open space and service provision would accompany housing and other development. This was assessed as having a significant positive effect on SA Objective 2 (Health).

5.1.7 The provision of housing was also expected to have a significant positive effect on SA Objective 5 (Equality and Accessibility). The scale and broad location of housing proposed meant that a range of dwellings and community facilities could be provided (particularly affordable housing) to meet specific needs. In addition, the focus on the delivery of employment opportunities, services and facilities in York City Centre, and at strategic sites as part of mixed use schemes, was expected to help ensure that accessibility would be maintained and enhanced.

5.1.8 Notwithstanding greenfield land-take associated with new development (and hence potential loss or displacement of biodiversity assets), there would be a significant opportunity to realise improvements to the City's green infrastructure network (including open space, biodiversity and geodiversity) through new provision, making links between existing resources and enhancing the management of resources, as well access enhancement generally. This was reflected in Policy SS1 and also through specific opportunities identified in policies SS5 to SS10. Overall, the spatial strategy policies were therefore assessed as having a positive effect on SA Objective 8 (Biodiversity).

5.1.9 Significant levels of new development would inevitably bring change to the character of the City, particularly where this was associated with strategic sites. However, effects on the setting of the City could be managed and it was noted that Policy SS1 specifically sought to conserve and enhance York's historic assets and character whilst policies SS4 to SS10 included locational specific guidance in this regard. The re-definition of the City's Green Belt through policies SS2 and SS3 would also help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the City and would look to concentrate development in the urban area, with attendant sustainability benefits. In consequence, the spatial strategy policies were assessed as

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having a positive effect on SA objectives relating to cultural heritage (SA Objective 14) and landscape (SA Objective 15).

5.1.10 An increase in population anticipated by Policy SS1 would have a negative effect on overall water usage and consumption across the City as well as waste generation.

5.1.11 Whilst growth of the City on the scale envisaged would inevitably bring negative effects (such as greenfield land-take and increased traffic) the suite of policies proposed would seek to ameliorate these impacts through sustainability measures which, for example, would encourage self-sufficiency and innovation in energy generation and the use of sustainable travel initiatives. The scale of the strategic sites could make such ambitions achievable in principle, although how these could be affected by unsustainable commuting patterns, for example, would require analysis over the longer term. In light of this assessment, the spatial strategy policies were appraised as having positive and negative affects against SA Objectives 6, 7, 9 and 12 reflecting the inevitable increase in vehicles and vehicle movements associated with the built development proposed for York. The extent of the cumulative impacts of this scale of development on the character of the City was considered uncertain, although the provisions for the sensitive masterplanning of City Centre sites in particular could in principle off-set adverse impacts and positively enhance character where regeneration was required.

5.1.12 Key uncertainties related to the longer term and cumulative effects of development on City character and specific issues such as flood risk, although retrospective analysis would be required to determine their precise scale and effects.

5.1.13 In determining the locations for this growth, a number of key environmental factors were considered as they provided an overarching narrative of influencing factors which shaped the choices in accommodating growth. The 2014 SA of the Publication Draft Local Plan concluded that this distribution of growth would have a positive effect across many of the SA objectives and that it performed better than the alternatives considered.

5.1.14 The spatial distribution to be taken forward for the draft Local Plan (2017) is understood to broadly follow the approach adopted at the Publication Draft Local Plan (2014) and more recently repeated in the Preferred Sites Consultation (2016) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement. Whilst the site specific boundaries of sites and their respective quantum of development may have changed, it is still considered that conclusions associated with the findings from the 2014 Appraisal remain applicable.

5.1.15 In preparing the Interim SA Report to support consultation on the Draft Local Plan, an assessment of the revised spatial strategy, including the updated quantum of housing and employment growth, along with the individual housing and employment sites will be conducted.

5.2 Housing Growth

5.2.1 The NPPF requires that local planning authorities identify their objectively assessed housing need (the OAHN), and that Local Plans translate those needs into land provision targets. Like all parts of the plan, such housing targets should be informed by robust and proportionate technical work.

5.2.2 For the purposes of this Technical Note we have compared the recommendation set out in the DCLG baseline which is based on the 2016 household projections and the latest technical work by GL Hearn which takes the DCLG baseline as its starting position and includes a 10% market signals uplift.

5.2.3 Figures previously considered for the baseline and OAHN which informed the housing growth figures which accompanied the 2014 Publication Draft Local Plan and 2016 Preferred Sites Consultation are superseded by the release of the 2016 based Household Projections and the SHMA Addendum (2017). The National Planning Practice Guidance (NPPG) sets out the recommended approach for calculating objectively assessed housing need. Paragraph 15 of the NPPG 'Housing and economic development needs assessments' states that "*Household projections published by the Department for Communities and Local Government should provide*

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the starting point estimate of overall housing need." However, the published household projections reflect trends that have happened in the past and the NPPG recognises these may have be adjusted upwards to reflect specific local circumstances. Paragraph 17 of this guidance states:

"*The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence*."

5.2.4 Furthermore, NPPG Paragraph 19 states that *"the housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings."* The NPPG states that market signals may include land prices, house prices, rents, affordability, the rate of development and overcrowding. NPPG Paragraph 20 goes on to state that "*a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections*." The NPPG does not provide guidance on how these worsening trends are accounted for within the need figure but requires a reasonable upward adjustment dependent on the significance of the affordability constraints. It states:

"In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (eg the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be."

5.2.5 The latest technical work is based upon the 2016 released DCLG Household Projections and is likely to enable the Council to meet the requirements set out in the NPPG and paragraph 158 of the NPPF that:

"*Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals*."

5.2.6 The housing numbers identified are provided to assist in the comparison of the evidence based OAHN figures rather than total amount of housing required across the plan period in line with the NPPF. In developing the overall housing need for the plan, the City Council will also need to incorporate the other requirements of the NPPF e.g. shortfall in previous years. The NPPF compliant figure adopted for the Local Plan will need to be appraised for the Draft Local Plan. This technical report has appraised the following figures for housing growth for the City of York:

- DCLG Baseline (2016): 867dpa – based on the July 2016 Household Projections
- GL Hearn recommended figure (2017): 953dpa – the demographic starting point for this figure was 867 per annum (based upon the July 2016 household projections). The figure also includes a 10% adjustment to include provision for affordable housing, in line with NPPG's guidance for reasonable adjustments to the household projections to be made in light of market signals.

5.2.7 In developing the overall housing need for the Draft Local Plan, the City Council will also need to incorporate the other requirements of the NPPF e.g. shortfall in previous years. The NPPF compliant figure adopted for the Local Plan will need to be appraised for the Draft Local Plan.

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Table 5.1 SA of Housing Growth Matrix

SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
1. To meet the diverse housing needs of the population in a sustainable way.	Short Term	+	+	**Likely Significant Effects** The DCLG figure identifies a baseline requirement OAHN of 867 dpa resulting in minor positive effects in the short and medium term with the potential for minor negative effects in the long term. The assessment of negative effects in the long term reflects the anticipated inability of the baseline figure to fully meet the identified objectively assessed need (which comprises the Government's baseline household projections and the modest market signals upwards adjustment). The recommended 2017 GL Hearn figure identifies an OAHN of 953 dpa resulting in minor positive effects in the short and medium term increasing to significant positive effects in the long term. The scale of housing delivery associated with this figure will meet housing demand based on the most recent population forecasts and would support the delivery of affordable housing. Analysis by GL Hearn in the 2017 SHMA Addendum identifies a shortfall in housing provision against previous targets. This past under delivery of housing may suggest that there is a 'backlog' of need. **Mitigation** None. **Assumptions** It is assumed that the delivery of housing will accord with the Spatial Strategy for York; namely to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement. **Uncertainty** None.
	Medium Term	+	+	
	Long Term	-	++	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
2. Improve the health and wellbeing of York's population	Short Term	-	-	**Likely Significant Effects** Housing growth is likely to generate minor, temporary adverse effects on health in the short term during construction (e.g. as a result of emissions to air from HGV movements and plant). Whilst effects will be dependent on the exact location of new development and its proximity to sensitive receptors, it can be assumed that new housing would be delivered within and in close proximity to existing residential areas. In the longer term, new housing could also adversely affect health due to, for example, emissions and increased traffic. It is anticipated that both housing figures will necessitate the need to accommodate development at greenfield sites which could result in the loss of open space. Each of the figures has been appraised negatively over the short, medium and long term. The 2017 recommended figure may have a greater effect than the baseline figure over the long term although unlikely to be significant. **Mitigation** New housing development may provide opportunities to incorporate health facilities, open space and measures to facilitate walking and cycling. Local planning policy should be put in place to minimise impacts on health. Additionally, regulatory requirements to limit detrimental effects on health and wellbeing, beyond the remit of the local plan, will also mitigate effects. **Assumptions** None **Uncertainty** None
	Medium Term	-	-	
	Long Term	-	-	
3. Improve education, skills development and training for an effective workforce	Short Term	+	+	**Likely Significant Effects** Investment in new development has the potential to stimulate increased investment in new facilities by generating demand (through the influx of new residents) and through developer contributions. Any investment in educational facilities and services would support educational attainment, which is recognised as being good within the City of York area. Furthermore, both the DCLG and GL Hearn figures are expected to help deliver student accommodation and a new settlement may encourage additional educational provision. Overall, the growth considered under each scenario have been assessed as having minor positive effects on this objective. **Mitigation** None. **Assumptions** None. **Uncertainty**
	Medium Term	+	+	
	Long Term	+	+	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
				There is a risk that development may increase pressure on existing educational facilities and in particular primary schools within the City.
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	Short Term	+	+	**Likely Significant Effects** Housing development will generate economic benefits associated with construction e.g. direct job creation, supply chain benefits and increased spend in the local economy by contractors and construction workers. However, effects in this regard will be temporary and the extent to which the jobs that may be created benefit the City of York's residents will depend on the number of jobs created and the recruitment policies of prospective employers. In the medium and longer term new housing and associated population growth will in turn help enhance the viability and vitality of existing businesses within central York as well as other centres. The 2017 recommended figure will provide a scale of housing growth to support economic growth and as such it considered to have significant positive effects. Furthermore, all growth figures could mean the objectives of the York Economic Strategy 2016 – 2020 could be met and that York can fully capitalise from the Northern Powerhouse programme. Overall, both housing figures have been assessed as having minor positive effects on this objective, except for the 2017 recommended figure in the long term, which is considered to have a significant positive effect due to benefits derived from the quantum of development proposed. **Mitigation** None. **Assumptions** None. **Uncertainty** The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.
	Medium Term	+	+	
	Long Term	+	++	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
5. Help deliver equality and access to all	Short Term	+	+	**Likely Significant Effects** Both the DCLG baseline and GL Hearn 2017 recommended figure would assist in meeting the net affordable housing requirement of 573 dwellings as identified in the 2016 SHMA. Residential development proposed of the scale proposed under both figures has the potential to improve the viability and vitality of existing shops, services and facilities in the areas where growth is located. New development may also encourage and support investment in existing, and the provision of new, services and facilities in the City of York through, for example, the receipt of developer contributions. This could help enhance the accessibility of existing and prospective residents to key services and facilities, although this would be dependent on the exact location of new development and the level of investment generated. However, depending on where new development is located, there is the potential for growth to increase pressure on existing community facilities and services. The Local Plan Site Selection Methodology identifies the need to locate development with sustainable access to facilities and service and to ensure sustainable access for transport. Overall, both levels of growth have been assessed as having minor positive effects on this objective. The 2017 recommended figure identified by GL Hearn is considered to have a significant positive effect in the long term. **Mitigation** None. **Assumptions** That an affordable housing policy requirement of 30% is maintained by the City Council. **Uncertainty** None.
	Medium Term	+	+	
	Long Term	+	++	
6. Reduce the need to travel and deliver a sustainable integrated transport network	Short Term	+/-	+/-	**Likely Significant Effects** No significant effects have been identified. Focusing development in accordance with the Council's spatial strategy would have positive effects on the objective as it would significantly encourage people to live in the town centres where services and facilities are more accessible reducing the need to travel. Housing growth could also help to maintain existing, and (potentially) stimulate investment in, public transport provision in the City of York area. The scale of a stand-alone settlement is likely to result in a quantum of development which will result in the development of a new local centre(s) and facilities reducing the need for out-commuting.
	Medium Term	+/-	+/-	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
	Long Term	+/-	+/-	In the short term (during construction) and once development is complete there is likely to be an increase in transport movements and associated congestion. Overall, the levels of growth proposed under both figures have been assessed as having minor positive and negative effects on this objective. **Mitigation** Measures should be put into effect to ensure consistency with the requirements of paragraph 17 of the NPPF which identifies as a core principle of planning the active management of patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are, or can be made, sustainable. **Assumptions** None. **Uncertainty** None.
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.	Short Term	-	-	**Likely Significant Effects** No significant effects have been identified. Minor negative effects are anticipated to arise from housing growth generating an increase in greenhouse gases both during construction (e.g. due to emissions from HGV movements and plant) and once development is complete (e.g. due to increased traffic generation and energy use in new dwellings). As highlighted under SA Objective 6, housing growth could help to maintain existing, and (potentially) stimulate investment in, public transport provision in the area which could help to minimise greenhouse gas emissions associated with car use. Overall, the growth under each figure have been assessed as having minor negative effects on this objective in the short, medium and long term. **Mitigation** There may be opportunities to promote and encourage sustainable modes of transport alongside new development. **Assumptions** None. **Uncertainty** The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain). Housing growth may present opportunities to increase investment in transport infrastructure and renewable energy.
	Medium Term	-	-	
	Long Term	-	-	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	Short Term	-/?	-/?	**Likely Significant Effects** No significant effects have been identified. Within a relatively small area (272 square kilometres), the York area boasts a range of sites with habitat and conservation value at international, national, regional and local levels of importance. These sites include ancient flood meadows, species-rich grasslands, lowland heath, woodlands and wetlands, which in turn are home to a variety of European protected species including bats, great crested newts, otters and other rare species such as the Tansy Beetle. Housing growth could have an adverse effect on biodiversity as a result of land take/habitat loss and disturbance during construction and increased recreational pressure once development is complete. It is likely that all scenarios will require development on greenfield sites – this has been assessed as having a negative effect on this objective. However it is considered that any adverse effects will be mitigated through the implementation of Local Plan policies related to biodiversity. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies the need to protect environmental assets (including nature conservation). The presence of Nature Conservation Sits of International importance will necessitate a Habitats Regulations Assessment in accordance with the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') (Amendment) Regulations 2010. Residential development at the level presented in both figures may provide opportunities to enhance the existing, or incorporate new, green infrastructure. This could potentially have a positive or significantly positive effect on this objective by improving the quality and extent of habitats and by increasing the accessibility of both existing and prospective residents to such assets. Overall, the growth figures have been assessed as having minor negative effects on this objective. However, there is the potential for significant negative effects to arise should development result in adverse effects on designated sites, although this is currently uncertain. **Mitigation** Measures to retain and enhance features of biodiversity interest e.g. species rich grassland and hedgerows on development sites should be adopted. **Assumptions** None of the development sites to be taken forward in the local plan will have an adverse effect on features of international importance. **Uncertainty** The effects of development on biodiversity which will be dependent to an extent on the location of development, the nature of detailed proposals and the outcome of site specific investigation, which at this stage are uncertain.
	Medium Term	-/?	-/?	
	Long Term	-/?	-/?	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
9. Use land resources efficiently and safeguard their quality.	Short Term	-	-	**Likely Significant Effects** No significant effects have been identified. Whilst effects against this objective are largely dependent on the location of development, which at this stage is uncertain, it is expected that both of the housing figures will necessitate the need for some development on greenfield sites. This likely requirement has therefore been assessed as having a negative effect on this objective. The NPPF says that planning should "*encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*". The Council should encourage developers to consider whether there is previously developed land available in suitable locations for new development, rather than locating development on undeveloped land. Overall, all of the growth proposed under both figures are considered to have minor negative effects on this objective. **Mitigation** None. **Assumptions** It is assumed that development sites would avoid development on best and most versatile land and encourage development on previously developed land. **Uncertainty** None.
	Medium Term	-	-	
	Long Term	-	-	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
10. Improve water efficiency and quality.	Short Term	-	-	**Likely Significant Effects** No significant effects have been identified. Housing will result in increased water consumption both during construction and in the longer term once development is complete. The increase in local population is expected to increase the demand on water resources, which has the potential for a negative effect on water quality. Yorkshire Water's Water Resources Management Plan 2014 has weighed up the demand and supply of water for the forthcoming 25 years until 2039/40. The demand model has inbuilt assumptions regarding the projected population and households as well as the projected effects of climate change, leakage, implemented water efficiency measures and assumed new homes in accordance with the Code for Sustainable Homes (the requirements of which are now contained within Building Regulations). York lies within the Grid SWZ zone within Yorkshire Water's area, which identifies a deficit between supply and demand from 2018/19 is 2.67Ml/d, increasing to 108.65Ml/d by 2039/40. A range of solutions are proposed to ultimately meet the forecast supply demand deficit in the Grid SWZ as well as development of existing or new assets. The options selected include leakage reduction, use of an existing river abstraction licence, three groundwater schemes and customer water efficiency. As the plan period stretches out, there is less certainty with regard to the mix of measures to be used and they are also likely to be revised in the next WRMP, to be adopted in 2019. Overall, all of the growth identified under both figures have been assessed as having a minor negative effect against this objective. **Mitigation** Customer water efficiency measures which could be incorporated on the development include water metering, water harvesting and the regulation of tap and shower flows. Implementation of efficiency measures has the potential to result in a reduction of per capita in water consumption, however the uptake of these measures is not yet known. **Assumptions** None. **Uncertainty** None.
	Medium Term	-	-	
	Long Term	-	-	
11. Reduce waste generation and increase level of reuse and recycling.	Short Term	-	-	**Likely Significant Effects** No significant effects are anticipated. Housing growth will result in resource use, particularly during the construction of new dwellings. Residential development will generate construction

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
	Medium Term	-	-	waste, although it is anticipated that a proportion of this waste would be reused/recycled. Overall, the growth proposed under both figures have been assessed as having a minor negative effect on this objective. **Mitigation** The performance of the selected housing figure will benefit from ensuring that recycling facilities are included in the design to ensure any waste created once the development is in operation is minimised. Local Plan policies should encourage the use of recycled and secondary materials in new developments and promote the reuse of construction and demolition wastes. **Assumptions** None **Uncertainty** None
	Long Term	-	-	
12. Improve Air Quality	Short Term	-/?	-/?	**Likely Significant Effects** Housing growth will result in increased emissions to air both during construction (e.g. due to emissions from HGV movements ad plant) and once development is complete (e.g. due to increased traffic generation). Development in accordance with the spatial strategy is likely to see a strong emphasis upon housing delivery within and around the main urban area and close to existing public transport links and main centres, reducing the requirement to travel by private car. The levels of growth proposed under both figures have been assessed as having a negative effect, albeit with some uncertainty concerning the magnitude and significance of the effects due to the uncertainties over development locations. **Mitigation** The effects of the proposed housing growth under either figure outlined could be mitigated by the application of other Local Plan policies that seek to reduce congestion and support investment in public transport. **Assumptions** None. **Uncertainty** The exact magnitude of effects will be dependent on the location of development at the individual site level which is currently uncertain.
	Medium Term	-/?	-/?	
	Long Term	-/?	-/?	
13. Minimise flood risk and reduce the impact of flooding to people and property in York.	Short Term	-/?	-/?	**Likely Significant Effects** No significant effects have been identified. Parts of York are identified as being at significant risk of fluvial flooding. Until the quantum of development

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
	Medium Term	-/?	-/?	is agreed and location of new development is known effects are considered to be uncertain. However it is considered that any adverse effects will be mitigated through the implementation of NPPF compliant Local Plan policies related to flood risk and sustainable drainage. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies avoiding areas of high flood risk (greenfield sites in flood zone 3a) as Criteria 3. Overall the effect of the housing growth scenarios are considered to be negative / uncertain. **Mitigation** As set out above, site selection will be informed by the Local Plan Site Selection Methodology and application of Policies related to flood risk and sustainable urban drainage. **Assumptions** None **Uncertainty** None
	Long Term	-/?	-/?	
14. Conserve or enhance York's historic environment, cultural heritage, character and setting.	Short Term	-	-	**Likely Significant Effects** No significant effects have been identified. The historic environment of the City of York is of international, national, regional and local significance. York's wealth of historic assets include: York Minster; over 2000 listed buildings; 22 scheduled monuments including the City Walls, York Castle, Clifford's Tower and St Mary's Abbey; four Registered historic parks and gardens, which include the Museum Gardens and Rowntree Park; and a large number of designated conservation areas. Housing growth could have an adverse effect on cultural heritage assets as a result of the direct loss of assets during construction or due to impacts on their setting during construction and once development has been completed. There may also be opportunities for housing growth to enhance the settings of heritage assets as well as access to them. The levels of growth provided for under the different figures is likely to have an adverse effect on local landscape and townscape character, although the magnitude of effects would be likely to be reduced through the application of the Local Plan Site Selection Methodology which identifies the need to protect environmental assess (including historic character and setting) and the implementation of other plan policies related to conserving and enhancing the historic environment. The level of effects associated with the different housing figures are likely to be similar to one another; although this will depend upon the selection of individual sites. However, as a basic principle the magnitude of effect is likely to be increased commensurate with the higher scale of growth under the GL Hearn figure.
	Medium Term	-	-	
	Long Term	-	-	

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SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure **867 dpa**	GL Hearn Recommended Figure **953 dpa**	
				Mitigation None **Assumptions** It is assumed that the development sites which are presented at the next stage of the plan development will be subject to a Heritage Impact Appraisal to assess whether the sites and policies of the Local Plan will conserve and enhance the special characteristics of the city. **Uncertainty** None
15. Project and enhance York's natural and built landscape.	Short Term	-	-	**Likely Significant Effects** No significant effects have been identified. The landscape includes a range of features of natural, historical, and cultural significance that contribute to the special qualities of the City of York. Housing growth could have an adverse effect on landscape character associated with the need to direct some development (under both figures) onto greenfield sites. Development may also affect townscape and the visual amenity of residential and recreational receptors both in the short term during construction and once development is complete. Housing growth may also present opportunities to improve townscape which could have a long term positive effect on this objective. Both the DCLG and GL Hearn figures considered as part of this sustainability appraisal have been appraised as having a minor negative effect against this objective. However, this will need to be revisited as part of the site specific assessments. **Mitigation** It is considered that adverse effects should be mitigated through the application of Local Plan policies related to the protection of the landscape. **Assumptions** None **Uncertainty** None
	Medium Term	-	-	
	Long Term	-	-	

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5.2.8 The GL Hearn recommended figure identifies the OAHN and forms the basis for identifying the level of housing growth which is required in accordance with the NPPF. The demographic starting point for this figure is 867 dpa (based upon the July 2016 household projections). The technical work produced by GL Hearn identifies the need for a 10% market signals (equivalent to 86 dpa) adjustment resulting in the 953 dpa figure. The SHMA technical work indicates that without this 10% uplift, this quantum of growth would support a moderate boost to affordable housing supply over the plan period.

5.2.9 The OAHN has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of housing in the long term (SA Objective 1).

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5.2.10 Significant positive effects have also been identified with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*), and Objective 5 (*Help deliver equality and accessibility for all*) in the long term. This assessment is predicated on the basis that the level of growth will generate economic benefits, both associated with construction and in the longer term new housing and associated population growth will in turn support investment in services and facilities and enhance the viability of businesses in the City of York and the vitality of the City Centre as well as other centres, encouraging additional investment.

5.2.11 Mixed positive and negative effects were identified in relation to transport (Objective 6). This reflects the likelihood that housing development will increase traffic within the City of York but that it may also present opportunities to increase investment in transport infrastructure, and support development in the most sustainable locations, which could reduce the need to travel by private car.

5.2.12 This OAHN was assessed as having a minor negative effect on SA Objective 2 (*Improve the health and well-being of York's population*). Whilst there is uncertainty regarding level of housing requirements (to be identified in line with the NPPF), it was considered that the scale of growth has the potential to have both temporary adverse health impact associated with construction works, particularly where new housing development is delivered close to existing residential areas, and longer term effects when dwellings are occupied. Further adverse effects may be generated where new housing sites are located in locations identified as Air Quality Management Areas or locations which have limited accessibility to health care facilities or are remote from other social infrastructure / employment locations reducing the opportunity for walking or cycling. A detailed understanding of the potential for negative effects will be identified following the completion of individual site appraisals.

5.2.13 The assessment identified the potential for housing growth to have minor negative effects on a range of objectives including climate change (SA Objective 7), water (SA Objective 10), waste and resource use (SA Objective 11) and air quality (SA Objective 12). This primarily reflects the use of resources required to support housing growth and generation of waste both during construction and once dwellings are occupied as well as the potential for increased traffic and congestion. There is some uncertainty with regards to air quality (SA Objective 12). Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development, land use (Objective 9) cultural heritage (SA Objective 14) and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by housing growth.

5.2.14 It is likely that the negative effects identified would be lessened through the implementation of policies contained within the Local Plan which seek to protect environmental assets and to minimise/mitigate adverse effects associated with new development as well as through the appropriate location of development. In this respect, the site allocations criteria used should ensure that new housing development is directed to locations that:

- Reduce the need to travel and/or encourage the use of sustainable modes of transport;
- Avoid adverse impacts on the City's built and natural environmental assets;
- Avoid locations that could exacerbate existing health issues (e.g. AQMAs);
- Make best use of previously developed land and avoid development in the floodplain;
- Incorporate service provision where possible.

Comparison to the DCLG Baseline

5.2.15 The DCLG baseline is based upon the projected household growth. The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour

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5.2.16 The DCLG baseline figure has been appraised as being less likely to deliver housing requirements in line with national guidance (and would be true of any figure below that identified as the OAHN). Analysis by GL Hearn in the 2016 SHMA identified a shortfall in housing provision against previous targets. This past under delivery of housing may suggest that there is a 'backlog' of need, and lower figures suggest that this need may not be adequately met. The latest GL Hearn technical work also identified that a 'market signals' uplift is required to enable more affordable homes to be built in line with identified need. In consequence, the DCLG baseline figure does not score the significant positive that the 2017 recommended figure does in respect of housing in the long term (SA Objective 1).

5.2.17 No significant negative or positive effects were recorded against the DCLG baseline figure.

5.2.18 Given the significant positive effects identified for the 2017 recommended figure against the SA objective for housing, employment and equity of access (with a similar performance for the remaining objectives for both the GL Hearn and DCLG figures), the scale of housing delivery envisaged for the GL Hearn recommended figure would meet housing demand based on most recent population forecasts and so would be a NPPF compliant level of growth. On balance, the 2017 recommended figure is considered to perform better, in sustainability terms, than the DCLG baseline projection figure.

5.3 Employment Growth

5.3.1 The NPPF provides a clear position on the need to build a strong competitive ecomomy. In respect of Local Plans it states at paragraph 21 and 22 of the guidance how Local Plans should support economic grwoth. In drawing up Local Plans, local planning authorities should:

- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
- Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
- Plan positively for location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
- Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
- Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.

5.3.2 The 2014 Publication Draft Local Plan contained provision for employment land to accommodate over 13,500 new jobs over the plan period. To inform the Preferred Sites Consultation in 2016, an Employment Land Review[11] was prepared to provide the necessary evidence base regarding need and demand in order to give effect to the NPPF objectives outlined above. Econometric projections by Oxford Ecomomics were applied to provide forecasts for employment land demand over the Local Plan period. These forecasts provided the starting point for determining the amount and type of employment land which is required in the Local Plan. The projections by Oxford Economics presented the following sencarios for employment growth:

- Baseline scenario forecasting a job growth of 10,500 over the period 2014-2031;

11 Employment Land Review (2016). Available to download via: https://www.york.gov.uk/downloads/file/11247/employment_land_review_2016 (accessed June 2017)

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- Scenario 1 which was predicated on the basis of UK recovery accelerates with GVA growth increasing from 2.6% to 3.0% per annum. The scale of job growth forecast under this option was 15,400 jobs over the same period;
- Scenario 2 assumes that the UK outlook remains unchanged from the baseline but sees 20% higher growth within professional services, financial and insurance and information and communication with a 10% lower level of growth within wholesale & retail trade, accommodation and food services. The level of job growth under this option is forecast to be 11,000.

5.3.3 The economic forecasts provide the main component for quantifying the objectively assessed development needs for the ecomomy. The economic forecasts are used to calculate floorspace and site requirements against the planning use classes.

Table 5.1 SA of Employment Growth Option Matrix

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
1. To meet the diverse housing needs of the population in a sustainable way.	Short Term	+	+	+	**Likely Significant Effects** No significant effects have been identified. The implementation of either the baseline scenario or option 1 or 2 will assist in creating significant employment opportunities to support sustainable economic growth in York. Given the aims of the York Economic Strategy, delivering the level of jobs in each scenario is likely to contribute to an increase in prosperity within the City of York area. This could both increase demand for new homes and increase people's chances of owning their own home or advancing on the property ladder. Overall, the employment growth options under each scenario have been assessed as having minor positive effects on this objective. **Mitigation** None. **Assumptions** Phasing of delivery of a mixed types of housing is aligned with the increase in employment opportunities created by the provision of employment land. **Uncertainty** None.
	Medium Term	+	+	+	
	Long Term	+	+	+	
2. Improve the health and wellbeing of York's population	Short Term	+/-	+/-	+/-	**Likely Significant Effects** No significant effects have been identified. Employment growth may generate minor, temporary adverse effects on health in the

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
	Medium Term	+/-	+/-	+/-	short term during construction (e.g. as a result of emissions to air from HGV movements and plant machinery). In the longer term, economic development could also adversely affect health due to, for example, emissions from operational uses or increased traffic. The significance of effect will be dependent upon the nature and scale of economic activity and its location in relation to sensitive receptors. The implementation of any of the three options would help to increase the amount of employment land across York and create significant employment opportunities and help to provide the conditions for sustained economic growth. There is strong evidence showing that work is generally good for physical and mental health and well-being. Worklessness is associated with poorer physical and mental health and well-being. Full time work generally provides adequate income, essential for material well-being and full participation in today's society. Options which increase employment opportunities are therefore also considered as having minor positive effects. Overall, the employment growth options under each scenario have been assessed as having mixed minor positive and negative effects on this objective. **Mitigation** None **Assumptions** None **Uncertainty** None
	Long Term	+/-	+/-	+/-	

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
3. Improve education, skills development and training for an effective workforce.	Short Term	+	+	+	**Likely Significant Effects** Job provision under the baseline scenario and option 1 will create training opportunities for employees and, potentially residents (e.g. through apprenticeship schemes). These options may also support the development of the City's educational institutions. Option 2 would also be expected to create opportunities for training, however given the focus upon supporting a higher skilled workforce this option would be expected to maximise opportunities to complement or support the City's educational institutions. This is likely to help deliver a flexible and highly skilled workforce for the future of the City. Option 2 has therefore been assessed as having a significant positive effect on this objective. Overall, the employment growth options under each scenario have been assessed as having minor positive effects on this objective except for Option 2 which is considered to have significant positive effects in the medium and long term. **Mitigation** None. **Assumptions** None. **Uncertainty** None.
	Medium Term	+	+	++	
	Long Term	+	+	++	

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	Short Term	+	+	+	**Likely Significant Effects** The baseline scenario and Option 2 would deliver an estimated 10,500 and 11,000 new jobs over the plan period. This will promote economic growth (both in the short term during construction and once development is complete), attracting inward investment and enabling the growth of indigenous businesses through associated employment land supply. Over the long term, Option 2 is considered to result in significant positive effects in light of it being in accordance with the economic priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff. Option 1 would deliver 4,900 additional jobs over the baseline scenario, with all sectors expected to benefit under this scenario. Increased job provision is also likely to stimulate additional growth in the construction sector associated with the provision of new / expansion of existing employment premises. Overall this option has been assessed as having a significant positive effect in the medium and long term. Overall, the employment growth options under each scenario have been assessed as having minor positive effects on this objective except for Option 1 which is considered to have significant positive effects in the medium and long term and Option 2, which is considered to have significant positive effects in the long term. **Mitigation** None. **Assumptions** None. **Uncertainty** The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.
	Medium Term	+	++	+	
	Long Term	+	++	++	
5. Help deliver equality and access to all	Short Term	+	+	+	**Likely Significant Effects** No significant effects have been identified. All three options would assist in addressing deprivation in the City. However, the

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
	Medium Term	+	+	+	extent to which new employment opportunities benefit these areas will depend to an extent on the type of jobs created and the skills present in the local labour market. The Local Plan Site Selection Methodology identifies the need to locate development with sustainable access to facilities and service and to ensure sustainable access for transport. Overall, all of the options have been assessed as having minor positive effects on this objective, **Mitigation** None. **Assumptions** None. **Uncertainty** The location of employment sites relative to areas of deprivation. .
	Long Term	+	+	+	
6. Reduce the need to travel and deliver a sustainable integrated transport network	Short Term	+/-	+/-	+/-	**Likely Significant Effects** No significant effects have been identified. Focusing development in accordance with the Council's spatial strategy would have positive effects on the objective as it would significantly encourage people to live in the town centres where services and facilities are more accessible thereby reducing the need to travel. In the short term (during construction) and once development is complete there is likely to be an increase in transport movements and associated congestion. The scale of change proposed under all three options will inevitably generate an increase in vehicles and vehicle movements above the existing baseline. Economic development may also present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting. Overall, all of the growth options have been assessed as having minor positive and negative effects on this objective. **Mitigation** Measures should be put into effect for all options to ensure consistency with the requirements of paragraph 17 of the NPPF which identifies as a core principle of planning the active management of patterns of growth to make the fullest
	Medium Term	+/-	+/-	+/-	
	Long Term	+/-	+/-	+/-	

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
					possible use of public transport, walking and cycling, and focus significant development in locations which are, or can be made, sustainable. **Assumptions** None. **Uncertainty** None.
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.	Short Term	-	-	-	**Likely Significant Effects** No significant effects have been identified. Economic development will result in increased emissions of greenhouse gases both during construction (e.g. due to emissions from HGV movements and plant but also from the embodied carbon in construction materials) and once development is complete (e.g. due to increased traffic generation and emissions from sites). In view of the higher levels of growth envisaged under this Option 1, emissions are also expected to be greater (although not at a level deemed to be significant). Whilst the exact magnitude of effects will be dependent on the type, design and location of economic development at the individual site level which is currently uncertain, on balance this option has been assessed as having a negative effect on this objective. Notwithstanding, economic development may present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting and associated emissions. Overall, the growth options under each option have been assessed as having minor negative effects on this objective in the short, medium and long term. **Mitigation** There may be opportunities to promote and encourage sustainable modes of transport alongside new development. **Assumptions** None. **Uncertainty** The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain).
	Medium Term	-	-	-	
	Long Term	-	-	-	

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	Short Term	-/?	-/?	-/?	**Likely Significant Effects** No significant effects have been identified. Within a relatively small area (272 square kilometres), the York area boasts a range of sites with habitat and conservation value at international, national, regional and local levels of importance. These sites include ancient flood meadows, species-rich grasslands, lowland heath, woodlands and wetlands, which in turn are home to a variety of European protected species including bats, great crested newts, otters and other rare species such as the Tansy Beetle. The development of new employment land could have adverse impacts on green infrastructure, biodiversity, geodiversity, flora and fauna without appropriate safeguards or mitigation plans. Similarly new tourism or retail development could also have adverse effects on local biodiversity depending on its location and proximity to conservation sites. Development could have an adverse effect on biodiversity as a result of land take/habitat loss and disturbance during construction and increased recreational pressure once development is complete. It is also likely that all scenarios will require development on greenfield sites (as well as brownfield sites which may have high bio-diversity value). It is considered that any adverse effects will be mitigated through the implementation of NPPF compliant policies related to biodiversity. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies the need to protect environmental assets (including nature conservation). Economic development at the level of the options presented may provide opportunities to enhance the existing, or incorporate new, green infrastructure. This could potentially have a positive or significantly positive effect on this objective by improving the quality and extent of habitats and by increasing the accessibility of both. The presence of Nature Conservation Sites of International importance will necessitate a Habitats Regulations Assessment in accordance with the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') (Amendment) Regulations 2010.
	Medium Term	-/?	-/?	-/?	
	Long Term	-/?	-/?	-/?	

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SA Objective	Employment Growth Options			Commentary on effects of each option
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
				Overall, the growth options have been assessed as having minor negative effects on this objective. However, there is the potential for significant negative effects to arise should development result in adverse effects on designated sites, although this is currently uncertain until such time as individual site appraisals have been carried out. **Mitigation** Measures to retain and enhance features of biodiversity interest e.g. species rich grassland and hedgerows on development sites should be adopted. **Assumptions** None of the development sites to be taken forward in the local plan will have an adverse effect on features of international importance. **Uncertainty** The effects of development on biodiversity which will be dependent to an extent on the location of development, the nature of detailed proposals and the outcome of site specific investigation, which at this stage are uncertain.

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
9. Use land resources efficiently and safeguard their quality.	Short Term	-	-	-	**Likely Significant Effects** As per the housing growth assessment, the effects against this objective are largely dependent on the location of development, which at this stage is uncertain. It is expected that there is likely to be a need to accommodate some development on greenfield sites under each option, which have therefore been assessed as having a negative effect on this objective. The level of growth forecast for Option 1 and the emphasis upon the growth within wholesale and retail is considered likely to place additional stress upon the delivery of greenfield sites. Accordingly, and due to the likely quantum of development forecast, significant adverse effects are anticipated. The NPPF says that planning should "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value". The Council should encourage developers to consider whether there is previously developed land available in suitable locations for new development, rather than locating development on undeveloped land. Overall, all of the growth options are considered to have minor negative effects on this objective with Option 1 considered to have significant negative effects in the long term. **Mitigation** None. **Assumptions** It is assumed that development sites under all options would avoid development on best and most versatile land and encouraging development on previously developed land. **Uncertainty** None.
	Medium Term	-	-	-	
	Long Term	-	--	-	
10. Improve water efficiency and quality.	Short Term	-	-	-	**Likely Significant Effects** No significant effects have been identified. Economic growth will result in increased water consumption both during

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
	Medium Term	-	-	-	construction and in the longer term once development is complete. Option 1 would result in increased water consumption to support economic growth. Water consumption under this option would be expected to be greater than under the baseline scenario or Option 2, however the adverse effects on this objective would not be expected to be significant. Overall, all of the options have been assessed as having a minor negative effect against this objective. **Mitigation** None. **Assumptions** None. **Uncertainty** None.
	Long Term	-	-	-	
11. Reduce waste generation and increase level of reuse and recycling.	Short Term	-	-	-	**Likely Significant Effects** No significant effects are anticipated. Economic growth will result in resource use, particularly during the construction of new premises. The operation of new premises will also lead to an increase in waste generation which is inconsistent with this objective. However, the implementation of other NPPF compliant local plan policies (such as 2014 Publication Draft Local Plan Policy WM1) would help to mitigation the generation of waste. Overall, the three scenarios have been assessed as having a minor negative effect on this objective. **Mitigation** The performance of the selected option will benefit from ensuring that recycling facilities are included in the design to ensure any waste created once the development is in operation is minimised. Local Plan policies should encourage the use of recycled and secondary materials in new developments and promote the reuse of construction and demolition wastes. **Assumptions** None **Uncertainty** None
	Medium Term	-	-	-	
	Long Term	-	-	-	

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
12. Improve Air Quality	Short Term	-/?	-/?	-/?	**Likely Significant Effects** No significant effects have been identified. Economic development will result in increased emissions to air both during construction (e.g. due to emissions from HGV movements and plant) and once development is complete (e.g. due to increased traffic generation and emissions from sites). Depending on the nature of the business, there could be operational effects on local air quality, although any such emissions to air will be controlled by relevant environmental legislation. There could also be effects arising from an increase in vehicle use associated with the growth in employment and the associated vehicle emissions. It will be important to ensure that any economic development (under the three options) does not exacerbate any problems in respect of York's current Air Quality Management Areas. Whilst the exact magnitude of effects will be dependent on the type, design and location of economic development at the individual site level which is currently uncertain, on balance all of the options have been assessed as having a negative effect on this objective. Notwithstanding, economic development may present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting and associated emissions. Further, there may be opportunities to encourage sustainable modes of transport alongside new development (although this is currently uncertain). **Mitigation** The effects of the proposed employment growth options outlined could be mitigated by the application of other Local Plan policies that seek to reduce congestion and support investment in public transport. **Assumptions** None. **Uncertainty** The exact magnitude of effects will be dependent on the location of development at the individual site level which is currently uncertain.
	Medium Term	-/?	-/?	-/?	
	Long Term	-/?	-/?	-/?	

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
13. Minimise flood risk and reduce the impact of flooding to people and property in York.	Short Term	-/?	-/?	-/?	**Likely Significant Effects** No significant effects have been identified. Parts of York are identified as being at significant risk of fluvial flooding. New economic development could have an adverse impact on flood risk and increase the risks of flooding to people and property if inappropriately sited or if no mitigation is secured. However, until the quantum of development is agreed and location of new development is known effects are considered to be uncertain. However it is considered that any adverse effects will be mitigated through the implementation of NPPF compliant Local Plan policies related to flood risk and sustainable drainage. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies avoiding areas of high flood risk (greenfield sites in flood zone 3a) as Criteria 3. Overall, the effect of the employment growth scenarios are assessed as having a negative effect on this objective although this is currently uncertain. **Mitigation** As set out above, site selection will be informed by the Local Plan Site Selection Methodology and application of Policies related to flood risk and sustainable urban drainage. **Assumptions** None **Uncertainty** None
	Medium Term	-/?	-/?	-/?	
	Long Term	-/?	-/?	-/?	
14. Conserve or enhance York's historic environment, cultural heritage, character and setting.	Short Term	-	-	-	**Likely Significant Effects** No significant effects have been identified. Economic growth associated with any of the three options could have an adverse effect on cultural heritage assets as a result of the direct loss of assets during construction or due to impacts on their setting during construction and once development has been completed. The levels of growth provided for under the different options is likely to have an adverse effect on local landscape and townscape character, although the magnitude of effects would be likely to be reduced through the application of the Local Plan Site Selection Methodology which identifies the need to protect environmental assets (including historic character and setting) and the
	Medium Term	-	-	-	
	Long Term	-	-	-	

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SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
					implementation of other plan policies related to conserving and enhancing the historic environment. The level of effects associated with the different options are likely to be similar to one another; however under Option 1, faster levels of growth may be promoted within the tourism and leisure sectors (as well as other sectors). This may present opportunities to enhance cultural heritage assets and their settings although this is also considered to be uncertain at this stage. Overall, the options are assessed as having minor negative effects on this objective. **Mitigation** None **Assumptions** It is assumed that the development sites which are presented at the next stage of the plan development will be subject to a Heritage Impact Appraisal to assess whether the sites and policies of the Local Plan will conserve and enhance the special characteristics of the city. **Uncertainty** None
15. Project and enhance York's natural and built landscape.	Short Term	-	-	-	**Likely Significant Effects** No significant effects have been identified. The landscape includes a range of features of natural, historical, and cultural significance that contribute to the special qualities of the City of York. Economic growth could have an adverse effect on landscape character associated with the need to direct some development (under all options) onto greenfield sites. Development may also affect townscape and the visual amenity of residential and recreational receptors both in the short term during construction and once development is complete. The three options considered as part of this sustainability appraisal have been appraised as having a minor negative effect against this objective. However, this will need to be revisited as part of the site specific assessments. **Mitigation** It is considered that adverse effects should be mitigated through the application of
	Medium Term	-	-	-	
	Long Term	-	-	-	

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SA Objective	Employment Growth Options			Commentary on effects of each option
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
				Local Plan policies related to the protection of the landscape. **Assumptions** None **Uncertainty** None

2017 Local Plan Policy Approach

5.3.4 In undertaking the consultation of the Preferred Sites in 2016, the Council identified its preference for Option 2 (*Re-profiled Sector Growth).* The council endorsed this option as it reflected the economic priorities of the Council to drive up the skills of workforce and encourage growth in businesses which use higher skilled staff. This scenario was adopted for the Publication Draft Local Plan in 2014.

5.3.5 To inform the 2017 Draft Local Plan Policy approach, the original 2015 Oxford Economic projections have been subject to a sensitivity test utilising the most recent econometric projections to ensure that the plan meets the demand forecast. The Council has decided to maintain Option 2 as its preferred option. The sensitivity test undertaken maintains the level of growth under this option as 11,000 new jobs.

5.3.6 Option 2 has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect to improving education, skills development and training for an effective workforce (SA Objective 3). This assessment of significant positive effects was predicated on the basis that delivery of this option would assist in delivering 20% higher growth (when compared to the baseline) within professional services, finance, insurance and information and communication. This option was considered likely to deliver a flexible and highly skilled workforce which would help to deliver the economic priorities of the Council.

5.3.7 Significant positive effects have also been identified with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*), particularly in the long term through the attraction of inward investment and enabling the growth of indigenous business, as has been experienced at York Science City. This assessment concluded that the level of growth will generate economic benefits, both associated with construction and in the longer term economic growth and associated population growth will in turn support investment in services and facilities and enhance the viability of businesses in the City of York and the vitality of the City Centre as well as other centres, encouraging additional investment.

5.3.8 Positive effects were identified in relation to housing (Objective 1), reflecting that economic growth will assist in increasing prosperity which could increase demand for new homes and increase people's chances of owning their own homes or advancing on the property ladder. Positive effects were also identified in relation to equality of access (Objective 5) with employment growth providing a potential means to address deprivation within the City and to meet the needs of rural areas.

5.3.9 Mixed positive and negative effects were identified in relation to health (Objective 2) and transport (Objective 6). This reflected the likelihood that economic growth may generate minor, temporary adverse effects on health both during construction and in the longer term as a result of an increase in vehicle movements and associated congestion. However, economic growth and employment opportunities are considered to be positive in terms of physical and mental well-being. Economic

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development may also present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting.

5.3.10 Negative effects were identified with regard to climate change (Objective 7), land resources (Objective 9), water (Objective 10) and waste and resource use (Objective 11). This primarily reflects the use of resources required to support economic growth and the generation of waste, both during construction and once new commercial development is operational. Further negative effects were identified in respect of cultural heritage (Objective 14), and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by economic growth.

5.3.11 In accordance with the appraisal of housing growth figures, it is considered that these negative effects would be lessened through the implementation of other policies contained within the Local Plan which seek to protect environmental assets and to minimise / mitigate adverse effects associated with new development as well as through the application of the Local Plan Site Selection Methodology which is based upon the application of the following criteria:

- Criteria 1: Protecting environmental assets (including Historic Character and Setting, Nature Conservation Assets and functional floodplain);
- Criteria 2: Protecting existing openspace;
- Criteria 3: Avoiding areas of high flood risk (greenfield sites in flood zone 3a);
- Criteria 4a: Sustainable access to facilities and services; and
- Criteria 4b: Sustainable access to transport.

5.3.12 The application of these criteria should ensure that new economic development is directed to locations that:

- Reduce the need to travel and/or encourage the use of sustainable modes of transport;
- Avoid adverse impacts on the City's built and natural environmental assets;
- Avoid locations that could exacerbate existing health issues (e.g. AQMAs);
- Make best use of previously developed land, avoiding development within the floodplain.

Baseline Scenario and Option 1

5.3.13 The Baseline Scenario identified a requirement for 10,500 new jobs whilst Option 1 identified a requirement for an additional 4,900 new jobs over the baseline. Under Option 1, the employment level within York is expected to exceed 130,000 by 2030 with employment growth expected to average 0.7% per annum compared with 0.5% under the baseline. Within York all sectors are expected to benefit under Option 1, with wholesale and retail trade expected to enjoy the biggest gains in absolute terms, with a net additional 2,400 jobs forecast by 2031.

5.3.14 The baseline scenario was assessed as having no significant positive or negative effects against any of the SA Objectives. Option 1 was assessed as having significant positive effects against employment (Objective 4) in both the medium and long term. Significant negative effects were identified for Option 1 in response to land use (Objective 9). This assessment was predicated on the basis that the scale of development proposed under the Option 1 and the focus upon growth within the wholesale and retail sector has the potential to result in the need to accommodate new development on greenfield sites.

5.3.15 Both the Baseline Scenario and Option 1 were appraised as having similar effects to Option 2. Positive effects were identified in relation to housing (Objective 1), reflecting that economic growth will assist in increasing prosperity, which could increase demand for new homes and increase people's chances of owning their own homes or advancing on the property ladder. Positive effects were also identified in relation to equality of access (Objective 5) with employment growth providing a potential means to address deprivation within the City and meeting the needs of rural areas.

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5.3.16 Mixed positive and negative effects were identified in relation to health and wellbeing (Objective 2). This reflects the likelihood that economic growth may generate minor, temporary adverse effects on health both during construction and in the longer term as a result of an increase in vehicle movements and associated congestion. However, economic growth and employment opportunities are considered to be positive in terms of physical and mental well-being. Mixed positive and negative effects were also identified in relation transport (Objective 6), reflecting the likelihood that employment development will increase traffic within the City of York but that economic development may also present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting.

5.3.17 Negative effects were identified with regard to climate change (Objective 7), land resources (Objective 9), water (Objective 10) and waste and resource use (Objective 11). This primarily reflects the use of resources required to support economic growth and the generation of waste, both during construction and once new commercial development is operational. Further negative effects were identified in respect of cultural heritage (Objective 14), and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by economic growth.

5.3.18 On balance, Option 2 (*Re-profile Sector Growth*) is considered to perform better, in sustainability terms, than either the Baseline Scenario or Option 1, reflecting in particular the significant positive effects identified in respect to improving education, skills development and training for an effective workforce (SA Objective 3) and on Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*) which is considered most complementary to the economic priorities of the Council.

5.4 Spatial Distribution

5.4.1 The City of York Council requested that a commentary is provided regarding the outlined three alternatives for the spatial distribution of sites within the City. The options comprise:

- Potential allocations identified in the June 2016 Preferred Sites Consultation;
- Potential allocations identified in the June 2016 Preferred Sites Consultation and in addition those sites identified as being surplus to requirement by the MoD;
- Proposed allocations to support the July 2017 Executive Briefing Paper.

5.4.2 The Potential allocations identified in the June 2016 Preferred Sites Consultation were subject to a Sustainability Appraisal by the Council with an interim SA Report being produced. The outcomes of the 2016 assessment were presented in six areas in accordance with the Preferred Sites consultation document. The division of the city into six areas has been replicated below.

5.4.3 At this stage, an SA has not been undertaken of the MoD sites or those additions / amendments which form the basis of the 2017 proposals. Until the growth options for the City have been confirmed the boundaries and quantum of development at a site level has not been confirmed. An appraisal of the individual sites and discounted options will be carried out to inform the development of an interim SA Report which will inform and accompany the Draft Local Plan in summer 2017. Accordingly, for the purpose of this Technical Note, it is only possible to provide a high level assessment regarding the spatial distribution of sites which did not from part of the 2016 Preferred Sites Consultation.

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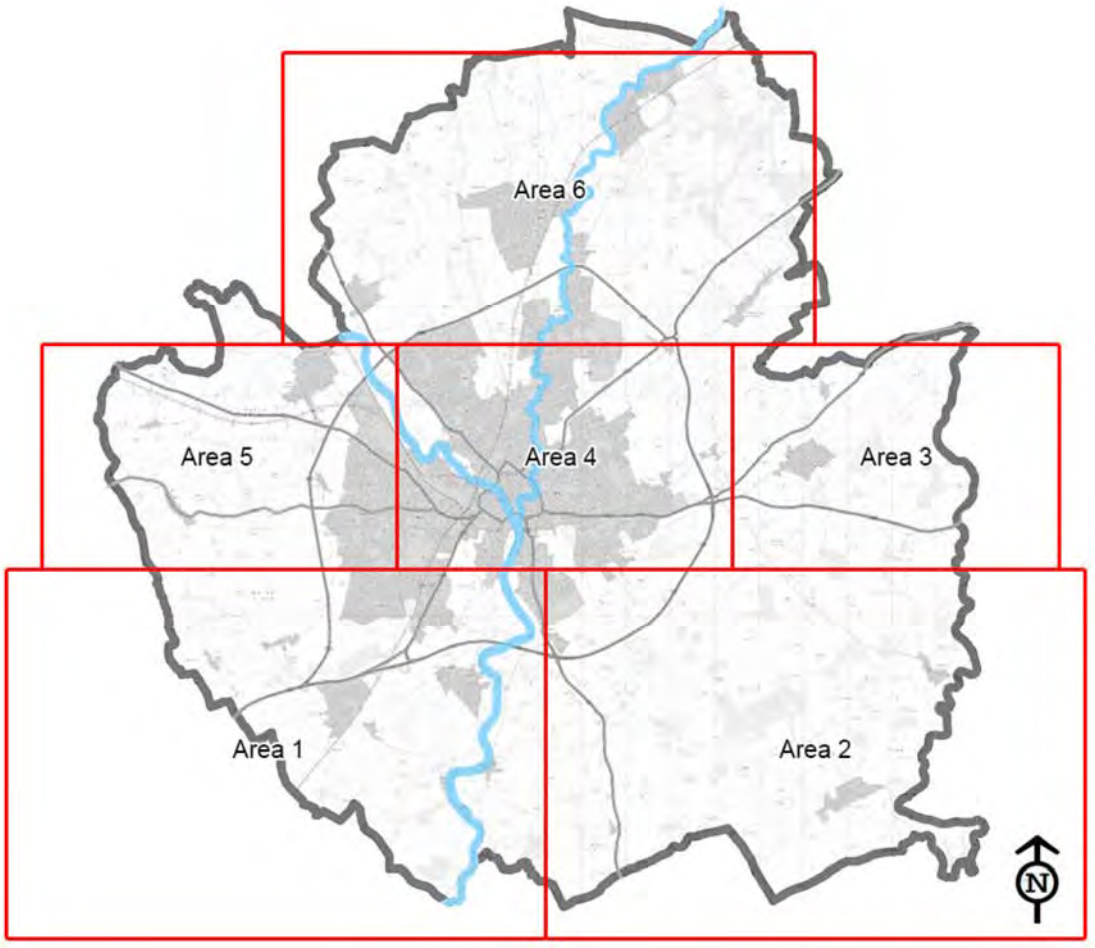
Figure 5.1 Consultation Zones



5.4.4 The 2016 Preferred Sites consultation identified potential housing allocations across the City with the potential capacity of 11,567 dwellings. This figure was broadly broken down as follows:

Table 5.2 2016 Preferred Sites Consultation

Area Reference	Total Dwellings	Employment Sites
Area 1 - south west	Six sites identified with provision for 416 dwellings.	No employment sites identified.
Area 2 (south east)	Three sites identified with provision for 3,518 dwellings.	Four sites identified providing 56,180sqm of floorspace.
Area 3 (east)	One site identified with provision for 84 dwellings.	One site providing 950sqm of floorspace.
Area 4 (central)	14 sites with capacity for 2,625 dwellings.	Four sites providing up to 105,050sqm of floorspace.
Area 5 (west)	Seven sites with capacity for 1,723 dwellings.	Two sites providing 63,300sqm of floorspace.
Area 6 (north)	Five sites with capacity for 3,201 dwellings.	A single site with capacity for 3,000 sqm.

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5.4.5 The spatial distribution of sites follows the preferred approach identified at Preferred Options stage (2013) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement, albeit ST14 which previously had a greater level of connectivity with central York is now identified (2016 and 2017) as having a buffer creating a degree of separation from the main urban area.

5.4.6 The SA undertaken as part of the 2016 Preferred Sites Consultation of the individual sites demonstrates how each site performed against individual environmental criteria and SA Objectives. The assessment of the 2016 preferred options broadly identified the following:

- Those housing allocations with a capacity of over 100 dwellings were assessed as having a significant positive effect against the objective to *Meet the diverse housing needs of the population in a sustainable way* (SA Objective 1) in response to providing a larger proportion of housing need for the city.
- Significant positive effects were also recorded for a number of strategic and non-strategic housing sites against the objective for *Improving the health and well-being of York's population* (SA Objective 2), this is particularly the case for those sites with good access to services and transport routes into central York. Sites across the six areas of consultation generally score well against this objective. The exception to this assessment is ST34 (ST15 *land to the west of Elvington Way)*, which as a stand-alone settlement is identified as having poor access to services and facilities and was assessed as likely to have a significant adverse effect against this objective, although given the scale of this standalone settlement (c3000 dwellings) there would be an expectation that transport links and improvement / establishment of transport infrastructure would be a requirement associated with the development of this site. Four of the employment sites are identified as having particularly significant positive effects against this objective. The positive assessments reflect the positive health benefits potentially available from development in central locations with opportunities to walk or cycle to work.
- One housing site was identified as having likely significant negative effects with regarding to SA objective 3 (*Improve education, skills, development and training for an effective workforce*). The site (H53 land at Knapton Village is allocated for 17 dwellings) was identified as having no access to educational provision. A number of sites within Area 4 (central) were assessed as having a likely significant positive effect against this objective in light of their proximity to educational facilities. Four employment sites are identified as having significant positive effects when appraised against this objective. Two of these site are within Area 4.
- A total of nine employment sites were appraised as having significant positive effects with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy).* The assessment identified significant positive effects for those sites with the capacity to provide over 100 jobs.
- With the exception of three sites, all housing allocations were assessed positively against Objectives 5 and 6 (*Help deliver equality and access to all* and *Reduce the need to travel and deliver sustainable integrated transport network*). A number of sites in Areas 1 (south west), 4 (central) and 5 (west) were assessed as having likely significant positive effects against these objectives due to their proximity to existing services, facilities and transport routes. Five employment sites were identified as having potentially significant positive effects against this objective, including all sites within Area 6 and five of the sites in Area 4 recorded the same assessment. Significant negative effects were recorded for ST26 (South of Elvington Airfield Business Park) in Area 2 due to existing transport connections being over 800 metres away from the site. No significant positive effects for these objectives were assessed within Area 2.
- No significant effects were recorded against SA Objective 7 (*To minimise greenhouse gases that cause climate change and deliver a managed response to its effects*) for housing or employment sites.
- Significant adverse effects were assessed on two housing sites (ST1 and H39) with regard to Objective 8 (*Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment*). The sites are both

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identified as being within 250 metres of a Statutory Nature Conservation Site. No significant adverse effects were recorded for any of the employment sites.

- Greenfied sites were assessed as having a significant adverse effect with regard to Objective 9 (*Use land resources efficiently and safeguard their quality*). These significant effects were recorded on all sites within Area 3 (east) and Area 6 (north). Significant positive effects were recorded against this objective for 19 of housing sites. Within Area 4 (central) 12 of the 16 housing sites were appraised as having significant positive effects and three of the six sites within Area 5 (west) reflecting the use of brownfield sites for development. For the employment sites, significant negative effects were recorded for a total of six sites for Area 1 to 5 (inclusive). Significant positive effects were identified for six employment sites.
- Significant negative effects were identified on a number of housing sites across all areas against Objective 10 (*Improve water efficiency and quality*). These effects have been identified for most, but not all strategic sites reflecting the pressure on water resources associated with larger development sites but also a number of smaller housing sites. Three of the five housing sites identified in Area 6 have been appraised in this way. Significant negative effects were recorded for three employment sites against this objective. These negative scores appear to relate to proximity to existing water bodies and are therefore site specific issues which may benefit from mitigation rather than reflecting a particular spatial issue.
- Two housing sites received were identified as having a significant negative effect against Objective 12 (*Improve Air Quality*), with two sites ST5 and H56 both identified as being in Air Quality Management Areas. All of the sites receiving this assessment are within Area 4 (Central).
- Housing site ST5 (York Central) and ST32 (Hungate) were both identified as having significant negative effects on SA Objective 13 (Minimise flood risk and reduce the impact of flooding to people and property) due to the presence of some areas of flood risk within the site which will require mitigation.
- Significant adverse effects were assessed against Objective 14 (*Conserve or enhance York's historic environment, cultural heritage, character and setting*) against ST15 (Area 2), and ST9 and ST14 (both in Area 6). A single employment site ST27 (Area 2) was identified as having the potential for significant negative effects. These assessments relate to the potential for negative impacts on cultural heritage given the potential for archaeological deposits. No significant positive effects were assessed against any of the housing or employment sites against this objective.
- Significant adverse effects were assessed against Objective 15 (*Protect and enhance York's natural and built landscape*) with regard to Housing Site ST31 (Area 1), H52 and ST7 (Area 3) and Sites ST14 and ST8 (both Area 6). Employment site ST27 (Area 4) was also recorded as having the potential for significant adverse effects due to its location adjacent to the A64.

Potential allocations identified in the June 2016 Preferred Sites Consultation and in addition those sites identified as being surplus to requirement by the MoD.

5.4.7 Following the 2016 Preferred Sites Consultation the MoD identified a number of sites as being redundant and available for development. The sites identified by the MoD comprise:

- Queen Elizabeth Barracks, Strensall (Area 6);
- Imphal Barracks, Fulford (Area 4);
- Towthorpe Lines (Area 6).

5.4.8 The sites have been assessed by City of York Officers against the Local Plan Site Selection Methodology which is based upon the emerging Plan's spatial strategy. This assessment has concluded that the Queen Elizabeth Barracks and Imphal Barracks site could potentially come forward for residential development with a capacity of 623 and 769 dwellings respectfully. The

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Towthorpe Lines site is considered by the Council to have greater development potential as an employment site.

5.4.9 None of these sites have been subject to a Sustainability Appraisal at this stage. A detailed assessment of these three sites will be undertaken by the Council to inform the preparation of an Interim Sustainability Appraisal which will be published alongside the Draft Local Plan when it is published for consultation.

5.4.10 Based upon a review of the 2016 Preferred Sites and the outcome from the Sustainability Appraisal of those sites, the following high level assessments can be drawn at this stage:

- Both the Queen Elizabeth Barracks site and Imphall Barracks site have the potential for significant positive effects with regard to SA Objective 1 (*Meet the diverse housing needs of the population in a sustainable way*). The provision of a housing at Strensall may help to meet housing need in that particular location, where previously no housing sites were identified. Provision of housing on larger sites may provide greater potential for a wider range of housing to meet local needs.
- Given its location at the edge of the City Centre, the Imphal Barracks site has the potential to deliver significant positive effects against SA Objective 2 (*Improving the health and well-being of York's population*) given its location in relation to services and facilities;
- Depending upon the scale of employment growth, the Towthopre site may generate significant positive effects with regard to SA Objective 4 (*Improve education, skills, development and training for an effective workforce*). The Queen Elizabeth site may result in negative effects against this objective in light of the distance between the site and the nearest primary school.
- The Imphal development within Area 4 has the potential for an assessment of significant positive effects with regard to SA Objectives 5 and 6.
- The Queen Elizabeth Barracks and Towthope sites are both identified as being in proximity to Strenshall Common Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI). Accordingly, there will be a requirement for Habitats Regulation Assessment to inform their suitability for inclusion. Their proximity to this designated site will inform the assessment recorded against SA Objective 8 (*Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment*).
- All three sites are understood to comprise brownfield sites, accordingly positive effects are likely to be assessed against SA Objective 9 (*Use land resources efficiently and safeguard their quality*).
- An assessment against SA Objectives 3, 7, 10, 11, 12, 13, 14 and 15 will require specific information to enable the Council to appraise these sites.

Proposed allocations to support the July 2017 Executive Briefing Paper

5.4.11 The spatial distribution of the sites put forward for allocation will be subject to individual site appraisals which will be reported upon in the Interim Sustainability Appraisal. In comparing the spatial distribution of sites from the Preferred Sites Consultation in 2016 and those sites which are being put forward for the Draft Local Plan consultation, the following high level observations have been made:

- Area 1 (South West) – Minor changes are proposed to the spatial distribution within this area existing residential allocations e.g. potential H2b land at Cherry Lane. No changes are proposed to any of those employment sites identified in the 2016 Preferred Sites Consultation.
- Area 2 (South East) – Strategic Site ST15 – Land West of Elvington Lane is subject to a recommendation to increase its overall site size from 159ha at Preferred Sites Consultation to 216 ha and provide around 540 additional dwellings (increasing over the overall allocation to 3,901). The site was previously appraised as having significant negative effects with regard to SA Objectives 2, 10, 14 and 15, reflecting its remote location from existing services and

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facilities, mixture of greenfield and previously developed land, proximity to Heslington Thillmire SSSI, potential for direct and indirect impacts on features of heritage importance and the impact of a freestanding settlement on the edge of York was considered to have negative landscape benefits. The scale of the development has the potential to make a significant positive contribution for meeting housing need. The quantum of development proposed is of a scale which can deliver a comprehensive scale of mitigation which can help to address and mitigate these adverse effects. The employment allocation at ST26 (Elvington Airfield Business Park) is proposed to increase in size to 15 hectares. Previously this site has been appraised as having significant negative effects with regard SA Objectives 2, 5 & 6, 9 and 10. A new employment allocation is also proposed for land north of Elvington Industrial Estate. The existing industrial estate is understood to benefit from high levels of occupancy and development of this site would assist in meeting an unmet demand for additional floorspace in this area with a positive assessment against SA Objective 2 likely. There are also proposals to include an allocation at Land to north of North Lane, Wheldrake (H28); no quantum of development has been identified.

- Area 3 (East) – No significant changes are proposed to housing or employment allocations within this consultation zone.
- Area 4 (Central) – The sites within this consultation zone are broadly assessed positively with regard to those objectives relating to housing, employment, equality, accessibility and use of land resources efficiently. The scale of development proposed within the Draft Local Plan (2017) includes the provision of the Imphal site (ST36) and extension of Site ST7 (East of Metcalf Lane) from 845 dwellings to 975 dwellings. Additional housing allocations are proposed for H12, H23 and H25 with capacity for 64 dwellings. No significant changes to employment sites within this consultation area were identified, with the removal of E5 and amendment of E11 to include provision of B1a. A greenfield site at Greenacres (1.95 hectares) is proposed for allocation in the Draft Local Plan.
- Area 5 (West) – The changes proposed within this consultation zone include a reduction in the level of housing development proposed at ST1 and ST2, reflecting proposals subject to current planning applications. An increase in development at H38 Land RO Rufforth Primary School is proposed for an additional 47 dwellings. No significant effects were recorded against this proposed allocation as part of the 2016 Sustainability Appraisal. Additional housing is proposed on two greenfield sites at Rufforth. Two proposed allocations would have the capacity to provide up to 54 new dwellings. A new employment site is proposed on greenfield land to the north of Northminster Business Park to provide an additional 20 hectares of employment land for B1a, B2 and B8 uses. The existing allocation to the south was appraised as having significant positive effects with regard to SA Objective 4 and significant negative effects with regard to Objective 9 reflecting the greenfield nature of the site. Housing allocation H57 is proposed for allocation as an employment site providing approximately 3.4 ha.
- Area 6 (North) – New sites have been identified at Queen Elizabeth Barracks and Towthope within Area 6. These site have already been discussed as part of the MoD commentary. Strategic Site ST14; Land to the West of Wigginton Road is subject to a proposal to increase its overall site size from 55ha (1348 dwellings) to 68ha (1672 dwellings). This site was appraised in the 2016 Preferred Sites Consultation as having significant negative effects with regard to SA Objectives 9, 10 and 15. Within the 2014 Publication Draft Local Plan this site was identified as an urban extension with the development area commencing adjacent to the A1237. The establishment of a buffer zone for the 2016 PSC and 2017 allocation creates a degree of separation to the York urban area and results in this strategic site increasingly taking the form of a stand-alone settlement. A new 3 hectare employment site is proposed on a greenfield site at Stockton on the Forest.

Summary of the Spatial Distribution options for City of York

5.4.12 The nature of changes associated with the 2017 Proposed Allocations have been summarised above. The Spatial Distribution of the proposed housing and employment allocations which are proposed for inclusion within the Draft Local Plan are considered to be in general accordance with

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the spatial strategy which informed the 2014 Publication Draft Local Plan and 2016 Preferred Sites Consultation. The spatial strategy is based upon prioritising development within and / or as an extension to the urban area and through the provision of a new settlement.

5.4.13 The emphasis within the siting of development sites remains to prioritise a single standalone new settlement at Land West of Elvington Lane (ST15), although as noted above, the revision of site boundaries associated with Land West of Wigginton Road (ST14) have introduced a degree of separation between this Strategic Site and the main urban area of York.

5.4.14 The introduction of MoD sites, introduces additional brownfield development sites to accommodate both housing and employment growth and provides for a redevelopment opportunity within the main urban area of York. The sustainability credentials of the MoD sites (and other potential allocations) will need to be subject to individual site specific assessment.

5.4.15 The final spatial distribution of sites will be determined by the decision made with regard to the housing and employment growth figures for York.

5.5 Conclusions

5.5.1 The City of York Council is undertaking preparatory work to develop their Local Plan. An Executive Briefing Paper has been prepared that sets out the key choices for the Council with regard to the DCLG Baseline and GL Hearn Housing Figures and employment options.

5.5.2 To ensure that the Council can demonstrate that the 'plan' and reasonable alternatives to the plan have been appraised consistent with the requirements of the SEA Directive and relevant UK regulations, the overall spatial strategy, the housing figures, employment growth options and the proposed distribution of the strategic sites have been appraised.

Spatial Strategy

5.5.3 The spatial strategy to be taken forward for the draft Local Plan is understood to accord with the approach adopted at the Publication Draft Local Plan (2014) and more recently repeated in the Preferred Sites Consultation (2016) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement.

5.5.4 It was assessed as having a significant positive effect on SA Objective 1 (Housing) as the anticipated scale of housing provision will mean that a range of housing could be provided (particularly affordable housing) to meet the objectively assessed housing needs of the City. This would also be expected to enhance the health and wellbeing of York's population and was assessed as having a significant positive effect on SA Objective 2 (Health). The scale and broad location of housing proposed meant that a range of dwellings and community facilities could be provided (particularly affordable housing) to meet specific needs and would have a significant positive effect on SA Objective 5 (Equality and Accessibility).

5.5.5 Whilst growth of the City on the scale envisaged would inevitably bring negative effects (such as greenfield land-take and increased traffic) it is anticipated that the Local Plan will contain a suite of policies that would seek to avoid, minimise or mitigate these effects.

Housing Growth Figures

5.5.6 The NPPF requires that local planning authorities identify their objectively need (the OAHN), and that Local Plans translate those needs into land provision targets. Like all parts of the plan, such housing targets should be informed by robust and proportionate technical work.

5.5.7 For the purposes of this Technical Note we have compared the DCLG 2016 household projections (baseline) and a recommendation set out in the latest technical work by GL Hearn.

5.5.8 The housing numbers identified are provided to assist in the comparison of the evidence based OAHN figures rather than total amount of housing required across the plan period in line with the NPPF. In developing the overall housing need for the plan, the City Council will also need to

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incorporate the other requirements of the NPPF e.g. shortfall in previous years. The NPPF compliant figure adopted for the Local Plan will need to be appraised for the Draft Local Plan.

5.5.9 This technical report has appraised the following figures for housing growth for the City of York:

- DCLG Baseline (2016): 867dpa – based on the July 2016 Household Projections
- GL Hearn recommended figure (2017): 953dpa – the demographic starting point for this figure was 867 per annum (based upon the July 2016 household projections). The figure also includes a 10% adjustment to include provision for affordable housing.

5.5.10 The GL Hearn figure which represents the OAHN has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of housing in the long term (SA Objective 1). Significant positive effects were also identified with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*), and Objective 5 (*Help deliver equality and accessibility for all*) in the long term. This assessment is predicated on the basis that the level of growth will generate economic benefits, both associated with construction and in the longer term new housing and associated population growth will in turn support investment in services and facilities and enhance the viability of businesses in the City of York and the vitality of the City Centre as well as other centres, encouraging additional investment.

5.5.11 No significant negative or positive effects were recorded against the DCLG baseline figure.

5.5.12 The 2017 recommended figure is considered to perform better, in sustainability terms, than the DCLG baseline projection figure. In addition the scale of housing delivery envisaged for the GL Hearn recommended figure would meet housing demand based on most recent population forecasts and so would be a NPPF compliant level of growth.

Employment Growth Options

5.5.13 Three options for employment growth for the City of York have been appraised:

- Baseline scenario forecasting a job growth of 10,500 over the period 2014-2031;
- Scenario 1:The scale of job growth forecast under this option was 15,400 jobs over the same period;
- Scenario 2: The level of job growth under this option is forecast to be 11,000.

5.5.14 Option 2 has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of improving education, skills development and training for an effective workforce (SA Objective 3). This assessment of significant positive effects was predicated on the basis that delivery of this option would assist in delivering 20% higher growth (when compared to the baseline) within professional services, finance, insurance and information and communication. This option was considered likely to deliver a flexible and highly skilled workforce which would help to deliver the economic priorities of the Council.

Distribution of Development

5.5.15 The spatial distribution of sites follows the preferred approach identified at Preferred Options stage (2013) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement. The proposed allocations identified for inclusion in the 2017 Draft Local Plan, subject to confirmation of housing numbers, accord with this spatial strategy with a focus of new development within or adjoining the main urban area and with a sustainable standalone settlement proposed at Elvington Lane, however the revision of site boundaries associated with Land West of Wigginton Road (ST14) have introduced a degree of separation between this Strategic Site and the main urban area of York. Development sites which were not appraised as part of the 2016 Preferred Sites Consultation, in particular the MoD sites, include brownfield land and form part of a larger built up area and are therefore considered to be in accordance with the Spatial Strategy.

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5.5.16 Those employment and housing sites will be subject to individual appraisal against the SA Objectives as part of a wider Interim SA Report which will accompany the draft Local Plan. An appraisal of the individual sites will only be able to commence once the Council has selected its Employment Growth Options and Housing Figure which will enable the boundaries and quantum of development to be confirmed.

Author	Reviewer
James Glynn / Andrew Williamson	Pete Davis

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One Planet Council 'Better Decision Making' Tool

Informing our approach to sustainability, resilience and fairness

The 'Better Decision Making' tool should be completed when proposing new projects, services, policies or strategies.

This integrated impact assessment tool was designed to help you to consider the impact of your proposal on social, economic and environmental sustainability, and equalities and human rights. The tool draws upon the priorities set out in our Council Plan and will help us to provide inclusive and discrimination-free services. The purpose of this new tool is to ensure that the impacts of every proposal are carefully considered and balanced and that decisions are based on evidence.

Part 1 of this form should be completed as soon as you have identified a potential area for change and when you are just beginning to develop a proposal. If you are following the All About Projects Framework it should be completed before going through Gateway 3.

Part 2 of this form should be filled in once you have completed your proposal and prior to being submitted for consideration by the Executive. If you are following the All About Projects Framework it should be completed before going through Gateway 4. Your answer to questions 1.4 in the improvements section must be reported in any papers going to the Executive and the full 'Better Decision Making' tool should be attached as an annex.

Guidance to help you complete the assessment can be obtained by hovering over the relevant text or by following this link to the 'Better Decision Making' tool on Colin.

Guidance on completing this assessment is available by hovering over the text boxes.

Please complete all fields (and expand if necessary).

Introduction	
Service submitting the proposal:	Strategic Planning
Name of person completing the assessment:	Alison Cooke
Job title:	Development Officer
Directorate:	Economy and Place
Date Completed:	30th May 2017
Date Approved: form to be checked by service manager	

Part 1

Section 1: What is the proposal?

1.1	**Name of the service, project, programme, policy or strategy being assessed?**
	Local Plan Update

1.2	**What are the main aims of the proposal?**
	The main aim of the report is to update Members as to the progress on the Local Plan following the Preferred Sites Consultation (2016). It presents the revised housing and employment growth needs for York. The report also provides officer recommended changes for potential site allocations in line with evaluated evidence received through consultation and changes to planning policy to incorporate in a revised Local Plan.

1.3	**What are the key outcomes?**
	The Local Plan is the planning policy document through which we aim to deliver York's sustainable development objectives in a spatial way through identifying policies to inform decision making and site allocations to meet development needs.

	Section 2: Evidence
2.1	**What data / evidence is available to understand the likely impacts of the proposal?** (e.g. hate crime figures, obesity levels, recycling statistics)
	There are several updated technical documents that have contributed to this report, as follows: > Stratgeic Housing Market Assessment (SHMA) Update outlining the updated Objectively assessment Housing Need (OAHN) by consultants GL Hearn (Annex 1 to this paper). > Employment Land review Update produced by CYC Officers (Annex 2 to this paper.) > Officers assessment of potential sites for development (Annexes 3-5 to this paper) > Consultation statement for the Preferred Sites Consultation (2016) (Annex 6 to this paper) > Gypsy, traveller and Travelling Showpeople Needs Assessment provided by consultants ORS (2017) (Annex 8 to this paper) > SA/SEA Technical Note produced by consultants Amec Foster Wheeler. This sets out the proposals from the housing and employment technical work against a framework of social, economic and environmental objectives for York.
2.2	**What public / stakeholder consultation has been used to support this proposal?**
	The Local Plan process has been subject to several consultations, the latest of which was the Preferred Sites Consultation (2016). This set out the Council's preferred houisng and employment need as well as sites to satisfy the demand. The outcomes of this consultation have been reviewed and incorporated into the emerging position. A Consultation Statement has been produced and accompanies this report (Annex 6) Further consultation, subject to members decision, will take place in late summer 2017.
2.3	**Are there any other initiatives that may produce a combined impact with this proposal?** (e.g. will the same individuals / communities of identity also be impacted by a different project or policy?)
	This report will ultimately feed into the emerging Local Plan wherein it is likely to be positive through meeting the city's spatial development needs and contribute towards meeting York's sustainable development objectives. Specifically in relation to communities, this will effect all people in York who engage with planning such as through obtaining planning permission as well as ensuring planning policies in place to meet the city's objectives for sustainable development.

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Section 3: Impact on One Planet principles

Please summarise any potential positive and negative impacts that may arise from your proposal on staff or residents.
This section relates to the impact of your proposal on the One Planet principles.

For 'Impact', please select from the options in the drop-down menu.
If you wish to enter multiple paragraphs in any of the boxes, hold down 'Alt' before hitting 'Enter'.

Equity and Local Economy

	Does your proposal?	Impact	What are the impacts and how do you know?
3.1	**Impact positively on the business community in York?**	Positive	The policies of the Local Plan support the delivery of the city's economic objectives and will enable York to realise its economic growth ambitions as set out in the city's economic strategy (2016). It will promote private sector employment growth through the provision of sites and infrastructure to deliver new jobs over the plan period for current and future residents. The Employment Land Review (2016 and update 2017) sets out our assumptions for identifying employment need. Meeting York's housing requirements is also likely to have a postive outcome for provision of affordable housing for workers within York.
3.2	**Provide additional employment or training opportunities in the city?**	Positive	The policies of the local plan support the delivery of the city's economic objectives and will enable York to realise its economic growth ambitions as set out in the city's economic strategy (2016). It will promote private sector employment growth through the provision of sites and infrastructure to deliver new jobs over the plan period for current and future residents. Housebuilding and commercial development as a result of allocations in the LocalPlan may provide some certainty over jobs in construction. The scale of employment activity depends on the growth targets agreed.
3.3	**Help individuals from disadvantaged backgrounds or underrepresented groups to improve their skills?**	Positive	The plan supports the delivery of the city's economic objectives and social objectives, including promoting social inclusivity. The plan will help to unlock the further potential of the higher and further education sector in York through development and redevelopment.

	Health & Happiness		
	Does your proposal?	Impact	What are the impacts and how do you know?
3.4	**Improve the physical health or emotional wellbeing of staff or residents?**	Neutral	The Local Plan aims to support healthy lifestyles and healthy environments across the city. The plan includes policies to conserve and enhance York's green infrastructure, providing opportunities for a healthy lifestyle and optimising its role in contributing to York being a healthy city, drawing on the Open Space Study (2014) and its recent update. Providing homes to meet the needs of people will also have a positive impact on people's well being.
3.5	**Help reduce health inequalities?**	Positive	The community facilities section of the plan has been revised to have a greater focus on health and wellbeing. The new section covers the protection and enhancement of sports, healthcare, childcare, and community facilities. An additional policy related to healthy placemaking has been added which encourages designing environments that encourage health-promoting behaviours, helping to delivery York's Joint Health and Wellbeing Strategy and the Council Plan. There are also opportunities as part of new development for the provision of new services. These will have to be developed in tandem to avoid negatives impact in the short-term.
3.6	**Encourage residents to be more responsible for their own health?**	Neutral	The Local Plan encourages healthy lifetsyles through the safeguarding and provison of different types of openspace and recreational opportunities. The plan includes policies to conserve and enhance York's green infrastructure, providing opportunities for a healthy lifestyle and optimising its role in contributing to York being a healthy city. See Annex 7 to this report to see updates to these policies.
3.7	**Reduce crime or fear of crime?**	Positive	The plan includes a placemaking policy which seeks to balance the needs of urban design principles for good design against 'secured by design' principles to design out crime, helping to delivery the City of York Streetscape Strategy Guidance (2014). See Annex 7 to this report to see updates to these policies.
3.8	**Help to give children and young people a good start in life?**	Positive	The Local Plan seeks to respond to the need to increase primary and secondary education provision, including addressing need arising from strategic development sites and supporting proposals to ensure that existing facilities can continue to meet modern educational requirements. See Annex 7 to this report to see updates to these policies.

Culture & Community			
	Does your proposal?	Impact	What are the impacts and how do you know?
3.9	**Help improve community cohesion?**	Neutral	Community cohesion and the development of strong, supportive and durable communities is promoted through the creation of sustainable, low carbon neighbourhoods.
3.10	**Improve access to services for residents, especially those most in need?**	Positive	The plan will prioritise tackling existing gaps and prevent gaps from being created in the provision of key services and public transport, helping to support the Council's Transport Plan 2011-2031. The Plan's spatial strategy also uses access to services and transport as a key indicator for sustainability and uses this to help determine suitable sites for development. The majority of strategic allocations are also expected to incorprate local provision on site and have access to sustainable transport.
3.11	**Improve the cultural offerings of York?**	Positive	A new cultural provision policy has been developed as well as strengthening references to culture throughout the plan. The new policy supports development proposals where they are designed to sustain, enhance and add value to the special qualities and significance of York's culture. See Annex 7 to this report to see the new and revised policies.
3.12	**Encourage residents to be more socially responsible?**	Positive	Through consultation the local plan process actively encourages residents to shape their communities by commenting on the policies that will shape development in the future in line with the Council's Statement of Community Involvement (2007)

Zero Carbon and Sustainable Water			
	Does your proposal?	Impact	What are the impacts and how do you know?

3.13	**Minimise the amount of energy we use, or reduce the amount of energy we will use/pay for in the future?**	Mixed	The plan will respond to the opportunities offered by the city's natural resources whilst at the same time protecting current and future residents from environmental impacts. It will help York become a sustainable, resilient and collaborative 'One Planet'. It will create energy efficient buildings, support the use of energy from renewable sources and ensuring York is climate ready. Notwithstanding this, development in York is likely to increase the city's resource consumption. LocalPlan policy relating to climate change, renewable energy and sustainable design have been updated in line with new/updated evidence base and legislation. See Annex 7 to this report for updates to these policies.
3.14	**Minimise the amount of water we use or reduce the amount of water we will use/pay for in the future?**	Mixed	The plan will respond to the opportunities offered by the city's natural resources whilst at the same time protecting current and future residents from environmental impacts. It will help York become a sustainable, resilient and collaborative 'One Planet' city, ensuring that new development uses water efficiently and delivers sustainable drainage solutions. LocalPlan policy relating to climate change, renewable energy and sustainable design have been updated in line with new/updated evidence base and legislation. See Annex 7 to this report for updates to policy.
3.15	**Provide opportunities to generate energy from renewable/low carbon technologies?**	Positive	A revised climate change section now more strongly ties the policies to the social and economic benefits of low carbon developments which consider sustainable design and construction principles. See Annex 7 to this report for updates to policy.

	Zero Waste		
	Does your proposal?	Impact	What are the impacts and how do you know?
3.16	**Reduce waste and the amount of money we pay to dispose of waste by maximising reuse and/or recycling of materials?**	Positive	The plan will contribute to the reduction of waste through supporting innovation and improvement of current waste practices and the promotion of recycling. Sustainable design and construction principles will be embedded in new developments. Local Plan policy relating to Waste management has been revised in line with the emerging Joint Minerals and Waste Local Plan being prepared by North Yorkshire County Council, City of York Council and North York Moors National Park. See Annex 7 to this report for updates to policy

Sustainable Transport			
	Does your proposal?	Impact	What are the impacts and how do you know?
3.17	**Encourage the use of sustainable transport, such as walking, cycling, ultra low emission vehicles and public transport?**	Positive	The plan will help deliver a fundamental shift in travel patterns by ensuring that sustainable development and travel planning is a key component of future development, promoting sustainable connectivity, reducing the need to travel, helping to deliver the infrastructure to support sustainable transport and managing private travel demand. Helping to support the Council's Transport Plan 2011-2031. This has also been translated into the Site Selection process as a key stage in considering suitability of a potential development site. The outcomes of sites are referred to in annexes 3-5. See Annex 7 for revisions to policy.
3.18	**Help improve the quality of the air we breathe?**	Positive	The plan supports measures to help reduce the emissions of Nitrogen Dioxide, Particulate, Carbon Dioxide and other greenhouse gases from both transport and other sources helping to deliver the Council's Low Emission Strategy (2012) and therefore features as a consideration throughout the Local Plan. See Annex 7 to this report for detailed updates to policy.

Sustainable Materials			
	Does your proposal?	Impact	What are the impacts and how do you know?
3.19	**Minimise the environmental impact of the goods and services used?**	Mixed	Development advocated by the Local Plan will have an inevitable impact on the use of resources and waste. However, sustainable design and construction principles will be embedded in new developments through policy. See annex 7 to this report for detailed policy updates.

Local and Sustainable Food			
	Does your proposal?	Impact	What are the impacts and how do you know?
3.20	**Maximise opportunities to support local and sustainable food initiatives?**	Neutral	n/a

Land Use and Wildlife

	Does your proposal?	Impact	What are the impacts and how do you know?
3.21	**Maximise opportunities to conserve or enhance the natural environment?**	Positive	York's Green Infrastructure, including open space, landscape, geodiversity, biodiversity and the natural environment will be both conserved and enhanced. This is a key consideration in the Local Plan and evidence base such as the Green Infrastructure and Openspace Study (2014, Openspace update 2017). The vision, spatial strategy and specific policies all support the conservation and enhancement of the natural environment. Furthermore, this is translated into the Site Selection methodology to determine a potential site's suitability for development . See Annex 7 for updates to specific policies and annexes 3-5 to see comments in relation to specific sites.
3.22	**Improve the quality of the built environment?**	Positive	The Local Plan will help York to safeguard its outstanding heritage for future generations by promoting development which respects the city's special character and culture and encourages opportunities for rediscovering and reinterpreting those assets which make it an attractive, beautiful and accessible city. The Plan will do this through the conservation and enhancement of six defining characteristics of York's built environment; strong urban form, compactness, landmark monuments, unique architectural character, archaeological complexity and landscape setting set out in the Heritage Topic Paper (2014) and Heritage Impact Appraisal (tbc 2017).
3.23	**Preserve the character and setting of the historic city of York?**	Positive	The plan will help York to safeguard its outstanding heritage for future generations by promoting development which respects the city's special character. The Local Plan will ensure that the city's heritage assets are preserved and enhanced. Beyond the city centre, the key radial routes are of particular importance, and the surrounding villages and Green Infrastructure, including its valued strays, river corridors and open spaces that contribute to the city's setting. The Historic Character and Setting evidence base (2003 updated in 2013 and 2014) identifies areas of primary importance for this. The Plan will also create a Green Belt for York that will endure beyond the end of this plan period providing a lasting framework to shape the future development of the city. Its primary aim will be to preserve and enhance the special character and setting of York. It will also have a critical role in ensuring that development is directed to the most sustainable locations.

3.24	**Enable residents to enjoy public spaces?**	Positive	Development will not be permitted which would harm the character of or lead to the loss of open space of environmental and or recreational importance unless it can be satisfactorily replaced. All residential development should contribute to the provision of open space for recreation and amenity. As supported by the open space study (2014) and its update and the Green Infrastructure Strategy.

3.25	**Additional space to comment on the impacts**

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Section 4: Impact on Equalities and Human Rights

Please summarise any potential positive and negative impacts that may arise from your proposal on staff or residents.
This section relates to the impact of your proposal on **advancing equalities and human rights** and should build on the impacts you identified in the previous section.

For 'Impact', please select from the options in the drop-down menu.
If you wish to enter multiple paragraphs in any of the boxes, hold down 'Alt' before hitting 'Enter'

Equalities

Will the proposal **adversely impact** upon 'communities of identity'?
Will it **help advance equality** or **foster good relations** between people in **'communities of identity'?**

		Impact	What are the impacts and how do you know?	Relevant quality of life
4.1	**Age**	Positive	The plan will meet housing needs and provide a range of house types for all ages. The SHMA (2016) and SHMA update (2017) provide relevant evidence for this. It will also improve the safety and accessibility of the city's streets and spaces.	Comfortable standard of living
4.2	**Disability**	Positive	The plan will meet housing needs and provide a range of house types for all ages. The SHMA (2016) and SHMA update (2017) provide relevant evidence for this. It will also improve the safety and accessibility of the city's streets and spaces.	Comfortable standard of living
4.3	**Gender**	Neutral	None deemed likely	n/a
4.4	**Gender Reassignment**	Neutral	None deemed likely	n/a
4.5	**Marriage and civil partnership**	Neutral	None deemed likely	n/a
4.6	**Pregnancy and maternity**	Neutral	None deemed likely	n/a
4.7	**Race**	Positive	Meeting Gypsy, Traveller and Travelling Showpeople's accommodation needs, supporting the outcomes of the Gypsy and Traveller Accommodation Assessment (2017)	Comfortable standard of living
4.8	**Religion or belief**	Neutral	None deemed likely	n/a
4.9	**Sexual orientation**	Neutral	None deemed likely	n/a
4.10	**Carer**	Neutral	None deemed likely	n/a
4.11	**Lowest income groups**	Positive	The plan will meet housing needs and provide a range of house types. The SHMA (2016) and SHMA update (2017) provide relevant evidence for this, including the need for afordable housing.	Comfortable standard of living
4.12	**Veterans, Armed forces community**	neutral	The emerging Local Plan and supporting evidence considers the potential of the MOD sites in York for development following the Defence Infrastructure Estates Review (2016). The closure of these sites will have an impact on the armed forces community which is out of the remit of the Local Plan.	n/a

Human Rights

Consider how a human rights approach is evident in the proposal

		Impact	What are the impacts and how do you know?
4.13	**Right to education**	neutral	None deemed likely
4.14	**Right not to be subjected to torture, degrading treatment or punishment**	neutral	None deemed likely
4.15	**Right to a fair and public hearing**	neutral	None deemed likely
4.16	**Right to respect for private and family life, home and correspondence**	neutral	None deemed likely
4.17	**Freedom of expression**	neutral	None deemed likely
4.18	**Right not to be subject to discrimination**	neutral	None deemed likely
4.19	**Other Rights**	neutral	None deemed likely

4.20	**Additional space to comment on the impacts**

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Section 5: Developing Understanding

Based on the information you have just identified, please consider how the impacts of your proposal could be improved upon, in order to balance social, environmental, economic, and equalities concerns, and minimise any negative implications.

It is not expected that you will have all of the answers at this point, but the responses you give here should form the basis of further investigation and encourage you to make changes to your proposal. Such changes are to be reported in the final section.

5.1	**Taking into consideration your responses about all of the impacts of the project in its current form, what would you consider the overall impact to be on creating a fair, healthy, sustainable and resilient city?**
	Given the wide range of policy areas covered by the Local Plan and its over all vision which responds to the issues, opportunities and challenges facing the city it is considered that the plan will have a strongly positive impact overall on creating a fair, healthy, sustainable and resilient city.

5.2	**What could be changed to improve the impact of the proposal on the One Planet principles?** (please consider the questions you marked either mixed or negative, as well as any additonal positive impacts that may be achievable)
	Preparation of the Local Plan is part of an ongoing process that involves monitoring the success and progress of its policies. The process will make sure it is achieving its objectives and making necessary adjustments to the plan if the monitoring process reveals that changes are needed. This enables the plan to maintain sufficient flexibility to adapt to changing circumstances. Furthermore, the plan is subject to ongoing Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment which appraises the plan and site allocations against a bespoke social, economic and environmental objectives to understand how the plan is contributing the sustainable development objectives for York.

5.3	**What could be changed to improve the impact of the proposal on equalities and human rights?** (please consider the questions you marked either mixed or negative, as well as any additonal positive impacts that may be achieveable)
	No mixed or negative impacts on equality and human rights are considered likely.

Section 6: Planning for Improvement

6.1	**What further evidence or consultation is needed to fully understand its impact?** (e.g. consultation with specific communities of identity, additional data)
	Members will use the recommendations to decide the future approach for the Local Plan which will then be subject to public consultation. A publication draft plan will then be prepared before being submitted to the secretary of state for examination.

6.2	**What are the outstanding actions needed to maximise benefits or minimise negative impacts in relation to this proposal?** Please include the action, the person(s) responsible and the date it will be completed (expand / insert more

Action	Person(s)	Due date

6.3	**Additional space to comment on the impacts**

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Part 2

Section 1: Improvements

Part 2 builds on the impacts you indentified in Part 1. Please detail how you have used this information to make improvements to your final proposal.

Please note that your response to question 1.4 in this section must be reported in the One Planet Council implications section of reports going to the Executive.

1.1	**For the areas in the 'One Planet' and 'Equalities' sections, where you were unsure of the potential impact, what have you done to clarify your understanding?**
	Given the wide ranging policy areas covered in the plan and the process taken so far in preparing the plan there are inherent links and good understanding of the one planet principles and equalities.

1.2	**What changes have you made to your proposal to increase positive impacts?**
	No changes considered necessary, however the monitoring element of the local plan process will ensure the success and progress of the policies are able to adapt to changing circumstances. For example, air quality will be monitored to ensure new development does not result in poorer air quality.

1.3	**What changes have you made to your proposal to reduce negative impacts?**
	No negative impacts anticipated.

1.4	**Taking into consideration everything you know about the proposal in its revised form, what would you consider the overall impact to be on creating a fair, healthy, sustainable and resilient city?** Your response to this question must be input under the One Planet Council implications section of the Executive report. Please feel free to supplement this with any additional information gathered in the tool.
	Given the wide range of policy areas covered by the Local Plan and its over all vision which responds to the issues, opportunities and challenges facing the city it is considered that the plan will have a strongly positive impact overall on creating a fair, healthy, sustainable and resilient city.

1.5	**Any further comments?**