

Consultation statement

City of York

**LDF** | Local  
Development  
Framework

ANNEX B  
EXECUTIVE  
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Core Strategy  
Preferred Options  
Consultation Summary

# Contents

## Information on the Preferred Options Consultation

1.	Introduction	1
2.	Consultation Documents	1
3.	Document Distribution / Publicity	2
4.	Consultation Events	3
5.	Consultation Responses	5

## Headline Responses to Preferred Options Consultation

6.	General and Key Diagram	5
7.	Background	7
8.	Vision	10
9.	Spatial Strategy	13
10.	The Role of York's Green Belt	24
11.	York City Centre	28
12.	York Northwest	31
13.	York's Special Historic and Built Environment	34
14.	Housing Growth, Distribution, Density, Mix & Type	36
15.	Access to Affordable Housing	41
16.	Access to Services	44
17.	Future Economic Growth	46
18.	Retail Growth and Distribution	50
19.	Sustainable Transport	53
20.	Green Infrastructure	59

21.	Resource Efficiency	63
22.	Flood Risk	67
23.	Sustainable Waste Management	69
24.	Minerals	72
25.	Delivering New Infrastructure	74
26.	Monitor, Manage and Review	76
27.	Sustainability Appraisal	77
28.	Topic Papers	78

**Further Consultation Following Preferred  
Options Consultation**

29.	Targeted Retail Consultation	80
	Abbreviations	84

N.B. Individual comments in full can be viewed at the Council Offices at 9 St Leonard's Place. Please contact the Council on 01904 551466 for further information.

# Information on the Preferred Options Consultation

## 1. Introduction

- 1.1 A full detailed summary of all the responses received to the Core Strategy Preferred Options consultation is provided in the 'Core Strategy Preferred Options Draft Consultation Statement & Schedule of Responses (2010)'. The main purpose of this document is to provide a summary of the responses received. The responses from the consultation will be used along with the Sustainability Appraisal and other emerging evidence base to produce a Submission draft Core Strategy.
- 1.2 The consultation commenced on 18 June 2009 and a series of publications and consultation techniques were used. These are detailed in Sections 2 to 4 below. A key part of the consultation was a citywide leaflet questionnaire that was delivered to all York households. Consultation on the leaflet ran until the end of August 2009. In addition, workshops, exhibitions and meetings with key groups were held. Some of these were carried out in September and October to ensure that interested groups and individuals were not excluded. This was important as many organisations and interest groups did not meet during the summer months. The consultation deadline was also effectively extended.
- 1.3 This report outlines the different consultation documents that were produced; sets out who was consulted; outlines the methods and techniques used during the consultation and summarises the key headline issues raised in the responses received.

## 2. Consultation Documents

- 2.1 The following documents were made available as part of the consultation<sup>1</sup>:
- 'Planning York's Future' leaflet questionnaire;
  - Core Strategy Preferred Options document;
  - Core Strategy Preferred Options Sustainability Appraisal, technical appendices and non-technical summary;
  - Core Strategy Preferred Options Habitat Regulations Assessment;
  - Comments Form; and
  - Easy-Read Core Strategy summary.
- 2.2 Prior to consultation on the Preferred Options the main document was subject to a Sustainability Appraisal. Sustainability Appraisal (SA) forms an integral

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<sup>1</sup> Available to view on the Council's website at:  
[www.york.gov.uk/environment/Planning/Local\\_development\\_framework/1331181/](http://www.york.gov.uk/environment/Planning/Local_development_framework/1331181/)

part of the Local Development Framework (LDF) and will be undertaken at key stages alongside the production of each Development Plan Document (DPD). The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into policy development. The Sustainability Appraisal for the Core Strategy Preferred Options considers the key sustainability issues arising from the proposed Core Strategy policies and objectives. This was published alongside the Preferred Options document.

- 2.3 There were several ways in which people and organisations could comment on the Preferred Options document. These were by:
- filling in the comments form;
  - writing to the City Development team;
  - emailing the City Development team;
  - using the electronic comments form which could be found on the Council's website; or
  - completing the 'Planning York's Future' leaflet questionnaire

### **3. Document Distribution/Publicity**

- 3.1 Information packs were sent out to those of the 2600 contacts currently on the LDF database who indicated that they wished to be informed of the progression of the Core Strategy. A list of all those consulted is provided in the 'Core Strategy Preferred Options Consultation Statement (2010)'. Specific consultees received information packs containing:
- Consultation letter;
  - Core Strategy Preferred Options document;
  - Sustainability Appraisal Non-Technical Summary;
  - Leaflet questionnaire; and
  - Comments Form.
- 3.2 All other contacts received information packs containing:
- Consultation letter; and
  - Leaflet questionnaire.
- 3.3 In addition to this all of the documents listed above were available to view on the Council's website, in the 15 City of York Council libraries, and at the Council's receptions at the Guildhall and City Strategy (9 St Leonard's Place).
- 3.4 The 'Planning York's Future' leaflet questionnaire was distributed to every household in the city, approximately 90,000 households, as an insert in the 'Your City' publication (A copy of the leaflet is included in the 'Core Strategy Preferred Options Consultation Statement (2010)').

## **Media**

- 3.5 In addition to distributing the documentation, the Council sought to further publicise the consultation and give details on how and when comments could be made. At the start of the consultation the Council published a press release and the consultation featured in the 'Your City' circulation in June 2009 (with leaflet questionnaire). An article also appeared in The Evening Press on 17 July 2009 highlighting the involvement of the Chamber of Commerce and York Property Forum and publicising the consultation.

## **4. Consultation Events**

- 4.1 Details on each event held as part of the consultation are outlined below. A schedule of all the events is provided in the 'Core Strategy Preferred Options Consultation Statement (2010)'.

### **Exhibitions**

- 4.2 The Council organised a series of exhibitions at locations across the city. The exhibitions were staffed by officers and provided the opportunity for members of the public to find out about the consultation. Exhibitions were held at the following locations:

- City Centre – 31 July and 1 August 2009;
- Central Library – 4 August 2009;
- Designer Outlet – 19 August 2009;
- Monks Cross Shopping Park – 20 August 2009;
- York College – 17 September 2009;

- 4.3 Similarly exhibitions were held at a number of major employers in the city:

- City of York Council – 24 July 2009;
- Shepherd Building Group – 11 August 2009;
- Primary Care Trust – 14 August 2009; and
- Card Protection Plan 'CPP' – 26 August 2009.

### **Workshops**

- 4.4 The Council held four workshops over the consultation period:

- A one day conference event for interest groups, members of the Talkabout Panel (York's citizen's panel) and developers – 28 July 2009;
- A half day workshop with key stakeholders on affordable housing – 21 September 2009;
- An evening workshop with the York Professionals and York Business Forum – 28 September; and
- A half day workshop with the Inclusive York Forum – 8 October 2009.

- 4.5 Each workshop on the Core Strategy took a similar format, commencing with short presentations on the preferred approach to particular topics. These

were followed by small group discussions based around a series of key questions to encourage a debate. The workshops were tailored to particular areas of the Core Strategy depending on the area of interest of the attendees. For example topics included the vision; options for delivering affordable housing; planning an attractive place for business; and planning for inclusive communities.

- 4.6 In total more than 160 people took part in the workshops, attendees ranged from individual residents and people from businesses in the city, to representatives from interest groups and developers.

### **LSP Board Meetings**

- 4.7 Officers did a presentation on the Core Strategy Preferred Options at the Without Walls Board on 14 July 2009 and attended most of the Local Strategic Partnership boards to make them aware of the relevance of the document to their areas of interest and the opportunity to comment. The boards attended included the Environment Partnership, the Economic Development Partnership, the Learning City Partnership, York at Large, the Inclusive York Forum and the YorOK Board.

### **Ward Committees**

- 4.8 The Core Strategy Preferred Options document was publicised at ward committees during June and July 2009. Officers attended or provided exhibitions at all ward committees. In addition, where requested, Officers did presentations and 'question and answer sessions' as part of the ward committee agenda. The latter included the Holgate, Haxby and Wigginton, Derwent, Heworth Without and Osbaldwick, and Heslington and Fulford ward committees.

### **Forums**

- 4.9 Officers attended a number of local forums to discuss the Core Strategy Preferred Options. Presentations and 'question and answer sessions' took place at meetings of the York Environment Forum, Open Planning Forum, York Independent Living Forum, York Archaeological Forum and Voluntary Sector Strategic Forum.

### **Meetings**

- 4.10 In addition to the events outlined above, a number of meetings were held as part of the consultation to enable more in-depth discussions with a range of groups, including the statutory consultees. These comprised:

- Meetings with key stakeholders including York Civic Trust, Natural England, English Heritage, Environment Agency, Government Office Yorkshire and Humber (GOYH), and Local Government Yorkshire and Humber (LGYH);
- A meeting with a focus group from the York Property Forum and York and North Yorkshire Chamber of Commerce; and
- Meetings with neighbouring local authorities including Leeds City Council, Ryedale District Council, and East Riding District Council.

## 5. Consultation Response

- 5.1 Over 2,250 'Planning York's Future' questionnaires were returned and a total of 1,249 individual comments to the Core Strategy document were received as a result of the consultation from 117 respondents. Respondents included a variety of groups, organisations and individuals. In addition over 160 people gave their views by attending one of the consultation workshops. It is estimated that around a further 500 people were made aware of the consultation through attending meetings, forums, ward committees and exhibitions across the city where the Core Strategy was being publicised and discussed.
- 5.2 A summary of the headline comments made by respondents as part of the Core Strategy Preferred Options consultation is set out below (Sections 6 to 28). Responses to the leaflet questions are set out at the beginning of each section, given the volume of responses received. A summary of the comments on the main documents and issues discussed in the meetings and workshops then follows. Where a comment has been made by a 'statutory' consultee this is indicated in brackets. A full summary of all the comments from the events and all comments on the documents is set out in the Preferred Options Draft Consultation Statement & Schedule of Responses (2010).

## Headline Responses to Preferred Options Consultation

### 6. General and Key Diagram

#### Planning York's Future Questionnaire

No specific questions.

#### Core Strategy Preferred Options Document

No specific questions.

#### Document Structure

1. The section on the city centre would fit better in the 'Special and Built Environment' section with links to other sections (GOYH).
2. The section on York Northwest would fit better in the 'Building Confident, Creative and Inclusive Communities' section with links to other sections (GOYH).
3. There is a need for clearer linkages throughout the document.
4. York's special historic and built environment should precede the sections on the city centre and York Northwest in order to reflect the pre-eminence of this aspect.



5. The historic environment should be the starting point of the plan, York's heritage and history are so important that they should drive the strategy (GOYH, English Heritage and CABE).

### **Document Length and Format**

1. The Submission document should be more succinct with less descriptive material, giving a clear message about how the area will change (GOYH).
2. Support the fact that there are only 17 policies (GOYH).
3. Contrastingly, the document is extremely detailed and the approach should be more open ended to encourage innovation, creativity and flexibility in partners seeking to deliver the vision.

### **Assessing Alternatives**

1. It is important to have a clear audit trail explaining how the Core Strategy has developed, what options were considered and the reason for selecting the preferred options (GOYH).

### **Cross Boundary Issues**

1. The document should give additional recognition to cross boundary issues to fully recognise the influence of York as a sub-regional city and its role in North Yorkshire (East Riding Council and North Yorkshire County Council).

### **Climate Change and Emissions**

1. The objectives of the section on Resource Efficiency and the Climate Change Act 2008 should head up the whole of the LDF. A policy document based on inappropriate levels and types of growth is never going to achieve overriding objective of tackling climate change.
2. Should include clear timescales, targets and indicators to meet required CO2 emissions by end of plan period.
3. Concerned that planning for excessive growth will have a negative impact due to increased levels of traffic and air pollution.

### **Evidence Base**

1. There is a need to do further work to reflect the current economic climate as much of the evidence base work was carried out pre-recession.
2. Need to identify necessary infrastructure and demonstrate, with input from key partners, that policies have been subject to viability testing and there is a reasonable prospect of delivery in the required timescales (GOYH).

### **Consultation**

1. How will the results of the leaflet be used and what weight will they be given in the evaluation process? Some of the questions were leading and would be highly affected by 'nimbyism'.

### **Key Diagram**

1. The Fordlands Road area should be marked on the key diagram as a small village to reflect Topic Paper 1.
2. Fulford and Heslington villages should not be shown as suburban areas of York.

3. Potential housing sites should not be shown as green belt on the key diagram as it pre-empts decisions to be made in the Allocations DPD.
4. Land adjacent to A1079 and Grimston Bar should not be shown as green belt on the key diagram.
5. Castle Piccadilly has not been given permission – legend is incorrect and should be amended.
6. The tram-train route should be shown as proposed or indicative route until the initiative has been confirmed.
7. Welcome the inclusion of key development opportunities and sites on the key diagram (Yorkshire Forward).
8. The diagram should exclude Harewood Whin from the green belt in recognition of importance of site as strategic waste management facility.
9. Query whether A66 is east of York (should be A166).
10. The key diagram does not exclude sufficient land from the Green Belt to meet future development needs.

## 7. Background

### Planning York's Future Questionnaire

No questions relevant to Section 1: Background.

### Core Strategy Preferred Options Document

#### Question 1:

Please tell us what you think of the content of this section.

- a) Do you feel that the background accurately reflects how York is now and how it might change in the future? Are there other issues relevant to land use that you feel we should cover? Please specify.

#### Regional Policy Influences

1. Welcome recognition of the strategic role of York as a sub regional city and the important role it plays within the Leeds City Region.
2. The targets set out in the RSS are questionable and unrealistic, given the current economic conditions. The levels should be lowered for the IRS.
3. An Environmental Capacity Study should be undertaken for York, which would determine more realistic growth provision, particularly in terms of housing levels.

#### Geography

1. Support protection of green corridors. Contributions from developers to manage and enhance Green Infrastructure should be sought.
2. Changes to draft Green Belt boundaries will be required to accommodate projected growth requirements.
3. York cannot be expanded boundlessly without damage to its special character and unique green setting.

### **P o p u l a t i o n**

1. Sustaining a 25% growth rate to 2029 will be a challenge and will be detrimental to the needs of York residents, impacting on the City's infrastructure, social cohesion, and natural environment. The growth rate estimate appears to be based on past trends which may not be replicated and does not accord with RSS housing targets, which are more modest. Measures which promote growth above the City's environmental capacity cannot be supported.

### **Y o r k ' s U n i q u e H i s t o r i c B u i l t E n v i r o n m e n t**

1. The section should mention other elements of the historic environment, which contribute to the city's distinctive character such as the legacy of chocolate and railway industry buildings (English Heritage).
2. The challenge is not simply to protect and enhance the wealth of historic assets, but to explore how they might better be utilised to deliver wider objectives for the City (English Heritage).

### **E c o l o g i c a l F o o t p r i n t**

1. The discussion of the eco-footprint principle is too one sided and pessimistic in tone and needs better balance. In describing the potential impact of growth and consumption, it ignores the other side of the equation – the enhanced human productivity that comes from consumption of resources.
2. The section should refer to reducing the carbon footprint and climate change. Relegating these issues to Section 2, indicates that CYC does not rate these issues as being of fundamental importance.

### **E m p l o y m e n t**

1. Higher and further education should be considered comparably to the former chocolate and railway industries.
2. The 'unadopted' Future York report recommends that the city's economy is doubled by 2026. It implies a large commuting workforce, or a massive increase in resident employees, the effects of which would be very damaging. To develop high value-added enterprises with an indigenous workforce requiring minimal increase in floor space would seem the logical way forward.
3. Support the assessment that tourism is an important part of York's economy.
4. No strategy for developing or enhancing links to local rural economy is mentioned. No mention is made of any allocation of space for the production of food (i.e. local farming). The spatial strategy should make specific provisions for the protection of agricultural land.

### **H o u s i n g**

1. The LDF should support the level, type and mix of housing set out in RSS, and acknowledge the need to release more green belt land for development.
2. In contrast, object to the level of growth set out in RSS. It is beyond the capacity of York to absorb this growth. The Council should lobby central

government for policy changes such as taxing land banking by developers and increasing social housing grants.

3. Support a shift to emphasise the need for more family homes and houses as opposed to flats. The delivery of houses should be achieved from the start of the plan period.
4. The RSS targets indicate that an additional 13,442 homes must be provided by 2030. The current rate of occupancy is 2.3ppu (people per unit). If the additional 52,200 people are to be accommodated at an anticipated 2.2ppu, this would require the provision of 23,727 units, an excess over the target of 10,285 units, requiring more development on Green Belt land.
5. RSS housing figures should be treated as a minimum requirement.

### **Retail, Leisure and Open Space**

1. The LDF should support independent local shops.
2. Challenge the validity of the 2008 Retail Study on the basis that there is no reason why York should seek the same 'unique selling points' as other towns and cities, such as Leeds and Hull.
3. There is a shortfall in the provision of sports and leisure facilities and there is a need for a Community Stadium.

### **Higher and Further Education**

1. Too much emphasis is placed on the expansion of the University of York – at the expense of other establishments, such as York St John University, which make a significant contribution to the educational needs of the City.
2. Concern over the 'studentification' of parts of the City, which can damage communities.
3. Need to promote additional research on student housing to ensure students are fully catered for as part of housing land work. These numbers are over and above housing requirements in RSS.

### **Transport**

1. Local air quality needs to be raised as a specific issue and challenge. To achieve a real improvement in air quality, a holistic approach to emission control needs to be taken across the City. This could be achieved through a Low Emission Strategy. Also need to consider the challenge of biomass burners.
2. It is important that the background section recognises the cumulative impact on the Strategic Road Network, operational conditions, proposed network enhancements and (Highways Agency).

### **Waste and Minerals**

1. The LDF should not specify a site for a waste incinerator although it may need to identify a site for large scale composting facilities.
2. The waste strategy pays insufficient attention to commercial and construction and demolition waste.

## 8. Vision

### Planning York's Future Questionnaire

**Question 1: Do you think that this Vision Statement and the four themes above are appropriate for York?**

- Over four-fifths (86%) of respondents agreed that the Vision Statement and the four themes are appropriate for York, whilst 14% did not.
- Respondents who disagreed that the Vision Statement and the four themes are appropriate for York were then asked what needs to be changed.
- 17% believe that any reference to being part of 'Leeds City Region' needs to be removed, whilst 13% said the Vision Statement and themes are too complicated or difficult to understand.
- 6% of respondents said both that theme 1 (Building Confident, Creative and Inclusive Communities) should be removed and there should be more emphasis on preserving the character of York.
- The remaining 5% said that there needs to be more emphasis on being environmentally friendly.

### Core Strategy Preferred Options Document

**Question 2:**

Please tell us what you think of the Council's preferred vision. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think that the LDF vision responds sufficiently to the following influences:
- The Sustainable Community Strategy;
  - York's issues, challenges and opportunities;
  - The RSS; and
  - Sustainable development, including the UK Sustainable Development Strategy?
- b) Do you consider that the right balance has been struck between these different factors? Do you think that there are other factors that should be considered? (please give details)

**General Comments**

1. The starting point for the vision should be to ensure that whatever happens in York, it is done in a manner which not only safeguards, but strengthens, the city's unique environment (English Heritage).
2. The vision should emphasise that York is regarded as a "key driver" of the Leeds City Region within RSS (Yorkshire Forward).
3. Support the vision, particularly key references to innovation and to York as a world-class centre for education. The main concern is that these do not get picked up in the 4 key themes and a new Key Theme "A World Class Centre for Education" is proposed.
4. The vision should draw out the interdependent nature of the city's future and past.

5. Satisfied that aspirations will balance physical growth and sustainability, reduce energy use, increase renewable energy, reduce waste, avoid inappropriate development in areas of flood risk, promote sustainable design and construction and avoid depleting the Sherwood sandstone aquifer (Environment Agency).
6. Given that the RSS runs up to 2026 that should be then end date for LDF as well.
7. The Vision should incorporate a strong encouraging statement as the planning process should be a positive one and growth is a positive part of the city's evolution.
8. There is a lack of consideration of infrastructure constraints. Doubt whether York's infrastructure can deal with vision of future economic growth and projections of housing needs. It is important that the Vision is underpinned by realism.
9. There should be more emphasis on the natural environment within the Core Strategy vision.
10. The vision should refer to the aspiration to create mixed and cohesive neighbourhoods, describing the role of the plan in placemaking rather than purely delivering homes and jobs.
11. Support the vision which reflects the ambitions of RSS (LGYH).

### **York's Special Historic and Built Environment**

1. York's special historic and built environment is the key driver of the Core Strategy. Green Belt is also important to the historic theme, as are views within and into the City (GOYH).
2. It should be made clear that in achieving other objectives, particularly a prosperous and thriving economy, the LDF will seek to ensure that its historic environment will be safeguarded (English Heritage).
3. Given that York is one of only a handful of Areas of Archaeological Importance in the country, archaeology should be more strongly referenced in the Vision.
4. Should be amended to be called 'York's Special Historic, Built and Natural Environment'.

### **Building Confident, Creative and Inclusive Communities**

1. Welcome the concentration of development on the main urban area, including the significant contribution from York Northwest.
2. Support the LDF in making provision for at least the level of homes set out in RSS up to 2026 and for rolling forward the RSS housing figure to the end of the plan period. Conversely it was suggested that the RSS is far too demanding and it would be damaging to the environment, transport infrastructure, the historic environment, and social cohesion to continue with its proposed levels of growth.
3. Ambitions of all educational institutions in city need to be recognised and supported, including ongoing development of York College.
4. The vision should recognise the need for development in outer villages to enable thriving sustainable communities.
5. Concern that the urban extensions beyond those identified could be opened up for development.

6. This theme should show how places and proposed development areas derive from the strategy (GOYH).
7. Flexibility needs to be provided to allow the release of land to ensure a continuous 5 year supply of deliverable housing sites in accordance with PPS3. This includes the potential need to release Green Belt land at any point required over the LDF period.

### **A Prosperous and Thriving Economy**

1. The vision should link providing sufficient land for employment to locations appropriate to the city's historic development (York Civic Trust).
2. The vision needs to expand on links between tourism and the historic city (GOYH).
3. Universities are important to the economy because of links with Science City and there is a need to retain a graduate workforce (GOYH).
4. The LDF should seek to achieve 37% market share, to strengthen York's position in the retail hierarchy, reduce leakage of trade and facilitate sustainability.
5. Resisting comparison goods retail development outside city centre and York Northwest, does not respond appropriately to York's issues, challenges and opportunities.
6. Increasing the number of modern retail units to attract a broader range of multiple retailers will have a detrimental effect on existing retailers, adversely affecting distinctiveness and the character of city's retail offer.
7. A declining retail market share does not imply a decline in the viability of the city centre. The development of Castle Piccadilly to address this issue will waste an opportunity to regenerate this area for wider public benefit.
8. Drawing in shoppers from outside and encouraging unsustainable consumption will have a detrimental impact on the historic core of the city.
9. If York already has a net inward flow of trips to work it seems unnecessary to build considerably more offices to invite even more commuting or enlarge York's population.
10. Different types of businesses should be attracted to the city, not just knowledge based industries. There is a need for a variety of manufacturing and knowledge-based economy job opportunities to cover all eventualities.

### **A Leading Environmentally Friendly City**

1. Support for the desire to ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk from River Ouse, Foss and Derwent and other sources (Yorkshire Water).
2. Support for the need to create a permanent Green Belt for York that will endure until at least 2030 or beyond, suggestions included to 2050.
3. The aim to create a permanent Green Belt to 2030 needs to be balanced with the aims of creating "a prosperous and thriving economy" and "building confident, creative and inclusive communities". There should be a greater degree of flexibility to allow for future change and growth.

4. Green Belt should be presented as a positive concept, not negative, it gives open space within the ring road and beyond the ring road protecting the green setting of York.
5. Why is it necessary to exceed renewable energy targets in RSS? The primary way to tackle climate change is to reduce CO2 emissions including reduced energy consumption.
6. Opportunities must be taken to mitigate the effects of climate change on the city. This means protecting gardens for growing food, more allotments, investing in Newgate Market, and improving energy efficiency of the existing housing stock as well as new.
7. Parts of LDF aim to conserve natural resources and enhance the local environment, but these are outweighed by continued adherence to excessive economic growth.
8. We need a vision that promotes architectural and urban design excellence and excellent public spaces to assist the economic image of the city.
9. Transport infrastructure should be one of the main drivers of the spatial strategy and not retro-fitted. (GOYH)
10. The current approach to transport is not forward thinking enough. Easy access is vital for businesses.
11. There is a need for us to live within environmental limits which is particularly important in light of the peak oil crisis.
12. Air quality is not adequately addressed at a strategic level. Development on the scale discussed in the LDF should consider overall impact on pollution and air quality.
13. Reference should be made to the eco credentials of the York Northwest site (GOYH).

## 9. Spatial Strategy

### Planning York's Future Questionnaire

**We may need, through the plan (LDF) process, to find land outside the main built up areas of York for employment and housing. If we need to take this approach, it will be based upon the following:**

**Question 6a: Protecting areas that preserve York's historic character and setting. Do you think that this is appropriate?**

- Nine out of ten (90%) respondents believe that the areas identified for preserving York's Historic Character and Setting are appropriate, whilst 10% do not.
- 3% of the sample commented that the areas of Green Wedges should be larger.

**Question 6b: Protecting York's green infrastructure including green corridors and nature conservation sites. Do you think that this is appropriate?**

- 94% of respondents agree with the areas identified to protect York's Green Infrastructure, whilst 6% do not.



**Question 6c: Minimising Flood Risk. Do you think that this is appropriate?**

- 95% of the sample agree that the highest risk flood zones identified for minimising flood risk are appropriate, whilst 5% do not.

**Question 6d: What other issues do you think we should consider?**

- Respondents were asked if there are any other issues that have not been considered, to which 67% did not comment. Of the individuals who did comment the main issues raised were:
  - Preserve the Green Belt or don't build houses in the Green Belt.
  - Don't build new houses on the flood plain areas.
  - Ensure that there is a good provision of public transport.
  - Ensure that areas have good drainage or proper water run off areas.
  - Dredge the rivers or becks regularly.
  - Preserve the identity of villages.
  - Ensure that flood protection measures are in place.
  - Ensure that areas have good local amenities to cope with any development.
  - York is big enough already or York can not take any more growth.
  - Redevelop properties that are already empty.
  - Use brownfield sites for any development.
  - Build more council houses or provide more affordable housing.

**Question 8: If we need to identify land for new homes do you think that areas A and B, currently in the draft Green Belt, are the most suitable locations? If no, which other areas would be more suitable?**

- Two-thirds (67%) of respondents agree that areas A and B are suitable locations for building new homes. The remaining third (33%) do not agree. Half of these did not suggest an alternative, of those that did the main areas identified were:
  - Area E
  - Area F
  - Area D
  - Brownfield sites only

**Question 9: If we need to identify land for employment do you think that areas C and/or I are suitable locations for industrial and distribution employment areas? If no, which other areas would be more suitable?**

- Over half (58%) of all respondents believe area C is suitable for industrial and distribution employment, whilst 41% agree with area I. The remaining 17% of the sample said that neither area C or I are suitable locations.
- Respondents were given the option of suggesting alternative areas for industrial and distribution employment, with the main areas identified as:
  - 3% Area A
  - 2% Area E
  - 2% Area F
  - 1% Area H and D

## Core Strategy Preferred Options Document

### Question 3:

Please tell us what you think of the Council's preferred approach to the spatial strategy. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think it is appropriate to identify land for development in the draft Green Belt for housing and employment?
- b) we would appreciate comments on whether the proposed spatial principles are 'fit for purpose'. Further information can be found in Topic Paper 1 'Approach to the Spatial Strategy'.
- c) If we need to identify land for new homes, do you think that areas A and B, currently in the draft Green Belt, are the most suitable locations? If not, which other areas would be more suitable?
- d) If we need to identify land for employment do you think that areas C and/or I are suitable locations for industrial and distribution employment areas? Are there any other areas that would be suitable?

### General

1. It is important to show a clear audit trail of how alternatives were considered prior to arriving at the preferred options of urban extensions A, B, C and I (GOYH and LGYH).
2. The section should set out more clearly how the strategic objectives flow from the vision and Regional Spatial Strategy (GOYH).
3. The strategy needs to set out what elements contribute to the special historic character and setting of York and use this to determine the extent to which the areas of search, levels of growth, proposed densities and role in the region might impact upon the character and setting of the City (English Heritage).
4. The levels of growth cannot be supported and therefore the preferred approach to accommodating such growth cannot be supported.

### Regional Role

1. York should not be considered as part of Leeds City Region and should not be seen as the economic driver for the sub-region.
2. The extent of York's sub-regional centre should be limited to the city centre and not extended to the remainder of the city. It is the city centre which forms the regionally significant centre and it is not appropriate for less sustainable suburbs to be afforded the same status.
3. Strategy should consider relationship between York and settlements within the East Riding of Yorkshire.

### 3a) The Appropriateness of Identifying Land in the Green Belt for Development

1. The strategy will establish a long-term green belt boundary which responds to a better understanding of York's special character and sense of place (English Heritage and GOYH).
2. The release of draft Green Belt land is required to create a new layer of development that is valued as much as the existing ones and to meet the RSS housing requirements.

3. It is neither necessary nor desirable to expand York, given the extent of brownfield development land available and the potential impact on the character of York.

### **3 b) Spatial Principles**

#### *SP1 - Settlement Hierarchy*

1. York is an appropriate focus for the majority of growth, although not all places within York itself should be treated equally.
2. Parts of York are so well served by neighbourhood facilities that they should be reclassified as centres in their own right e.g. Monks Cross.
3. There is significant disagreement over the future role of villages within City of York's authority, and the levels and types of growth apportioned to them with some supporting growth in the villages and others opposing it.
4. The strategy should set out more explicitly the need for urban extensions.
5. The strategy should set out how much growth would be apportioned to each 'place' in York, and recognise that not all places within the same tier should be expected to provide for the same levels of growth.

#### *SP2 - Areas of Constraint*

1. The policy should be more positively framed as the identification of site assessment criteria to help achieve sustainable growth rather than constraint led.
2. Constraints should be applied to each individual site, rather than as absolutes, to weigh up the merits of one site against another.
3. The approach may create two-tier protection, where land outside the constraints layer is considered less important or dispensable.
4. The approach should reflect the historic pattern of growth where development expands along linear corridors and villages coalesce with the urban core.
5. There is disagreement as to whether the outer ring road should form a constraint. Some see it as a way of concentrating development on York, reinforcing its urban core, whilst others felt that using it as a constraint is not reflective of the character of the settlement patterns of the past. Furthermore, concentrating development within the ring road would lead to town cramming and prejudice principles such as preserving York's historic character. It would also lead to the loss of green belt adjacent to the urban edge which plays an important role.
6. The constraints should include fluvial and pluvial flooding, as well as risk from surface water flooding.
7. Support the precautionary approach to flood risk (Environment Agency).
8. The approach should consider additional constraints including agricultural land quality; amenity and noise issues; emissions; contamination and the need to meet green infrastructure standards (includes Natural England).

#### *SP3 - Approach to Future Development*

1. Support the focus on previously developed land, and the recognition of the role of major development opportunities to help deliver the strategy (includes Yorkshire Forward).
2. Should area A&B be considered as strategic sites as there is a strong likelihood they will be needed to meet housing needs (LGYH)?

3. The approach is over-reliant on large strategic sites and may be better delivered through a rolling programme of smaller dispersed developments.
4. It is inappropriate to discuss the release of green belt land before the SHLAA is complete.
5. The approach should allow for greenfield land to be considered before brownfield where it provides for more sustainable solutions, which help achieve other aims of the Plan (includes Yorkshire Forward).
6. The sequential approach should be applied within each tier of the settlement hierarchy rather than greenfield land releases being reliant on a lack of available brownfield land within other settlements.
7. The sequential approach should not ignore development that will be necessary to enable other settlements to fulfil their roles (includes LGYH).
8. The approach should consider development on rural brownfield sites.
9. The Spatial Strategy should be driven by the visions of individual settlements and the approach to meeting their needs and opportunities (includes LGYH).
10. A distinction should be made between the level of Local Service Centres and Villages in the sequential approach (LGYH).
11. Emissions must be kept to an absolute minimum through a LES. This will prevent further deteriorations in air quality and extensions of existing AQMAs. YNW may have considerable impacts on air quality. Site should be redeveloped as a Low Emission Zone.
12. Cumulative impact of Spatial Strategy on the Strategic Road Network should be taken into account (Highways Agency).

*3c) and 3d) – Future Approach to Land for Housing and Employment Growth*

1. Support the release of land at A and B for housing development (in the main, this reflects the views of the development industry).
2. The strategy should only consider brownfield sites for development.
3. The strategy should bring forward employment development in early years (supporting existing business park), followed with mixed use, and then residential development towards the end of the plan period.
4. Site I is in a remote location and should not be considered for employment.
5. How can peripheral development on the north-eastern and eastern sides of York be reconciled with Policy CS1 that states that "areas ... which provide an impression of a historic city situated within a rural setting" should continue to remain open in order to safeguard special character of York (English Heritage)?
6. Area A should be reconsidered in light of the comments of the Green Belt Local Plan Inspector concerning important views from the ring road (English Heritage).
7. Identifying areas A and B as potential housing sites in the long-term could give developers the green light to bring them forward earlier than expected in the plan period.
8. The strategy should release additional land over and above that identified in the preferred approach, since A+B alone will not provide sufficient housing land to meet projected levels of need. This could allow for lower

densities in the urban area which would reduce the impact on the character of the historic city.

9. Parts of Area A should be brought forward in the early years, before 2021.
10. There is a mixed response to the potential for employment development at areas C (Hull Road) and I (Northminster Business Park). Further evidence is needed on how it fits with the wider strategy (LGYH).
11. The approach should set out more explicitly the role that A&B will have in fulfilling the strategic role of York as part of the Leeds City Region and how they fit with planned transport investments (LGYH).
12. Sites should take account of existing infrastructure and be phased to coordinate with essential infrastructure provision.
13. Other areas suggested as alternatives are set out below.

## **Spatial Strategy Alternative Areas of Search**

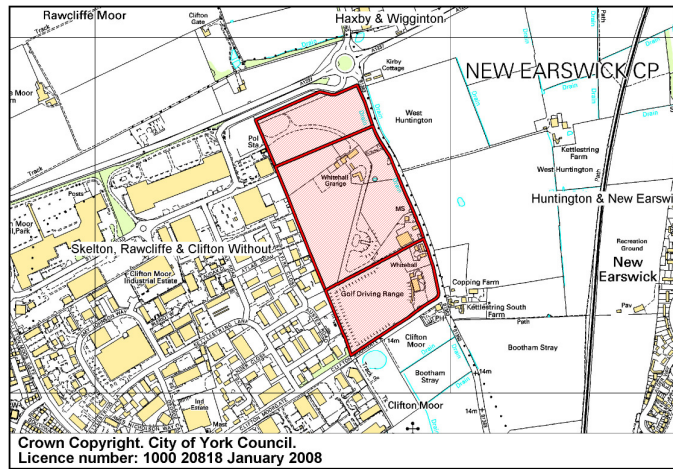
The following sets out the areas which respondents felt should be included in the spatial strategy either instead of, or in addition to, the preferred areas of search A, B, C and I. A number of respondents to the questionnaire also suggested alternative areas of search and these are outlined at the start of Section 9.

Only areas which are considered to be strategic in nature have been included. For the purposes of this summary we have used a threshold of 10ha however the size of a strategic site still needs to be decided and we would normally consider a strategic site to be larger than 10ha. It also only includes areas which could be clearly identified from the information that was submitted. For example, if the respondent:

- submitted a plan showing the area they were referring to;
- referred to one of the long list of areas of search from Topic Paper 1; or
- specifically referred to sites previously submitted as part of the Allocations DPD Issues and Options consultation.

# Land at Whitehall Grange, Clifton Moor

Raymond Barnes: ref 172

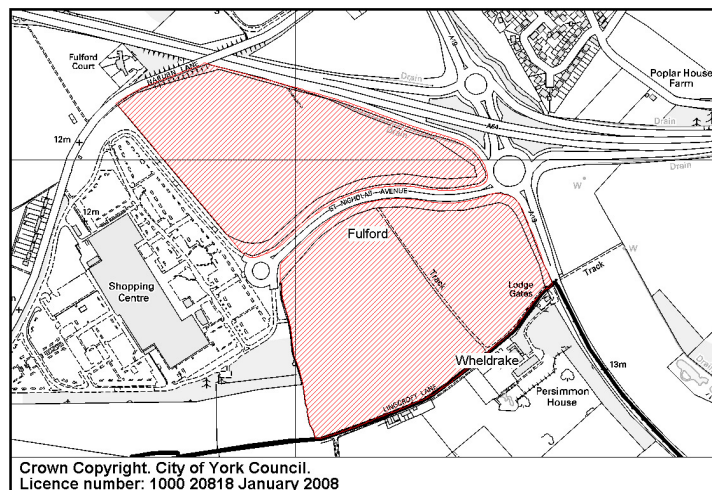


## Proposed Use

Employment

# Site Adjacent to the West of A19 and South of A64 (Including Local Plan Reserved Land)

Dobbies Garden Centres PLC: ref 2507, Land and Development Practice: ref 568/476

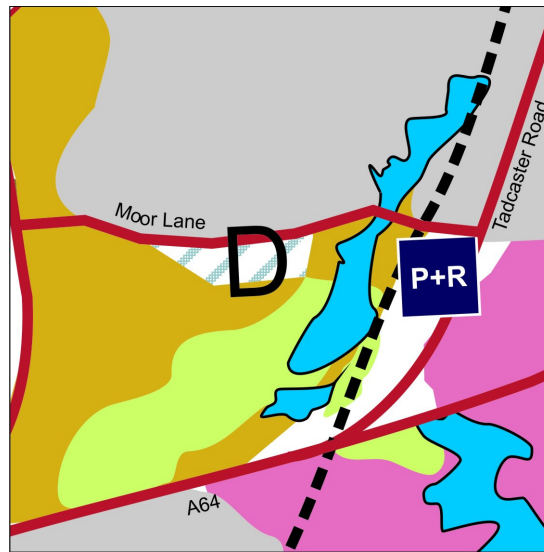


## Proposed Use

Employment

## Area of Search D, South of Moor Lane

Moor Lane Consortium: ref 2542, Persimmon Homes: ref 161

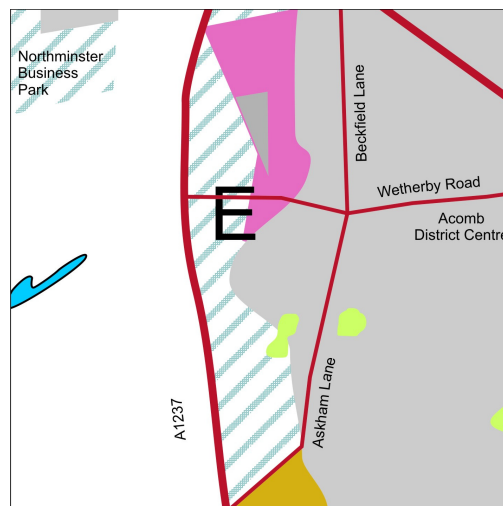


### Proposed Use

Mixed use / Employment / Residential

## Area of Search E, Land West of Chapelfields (or parts of)

Atkinson & Sykes: ref 2699, Persimmon Homes: ref 161, questionnaire respondents

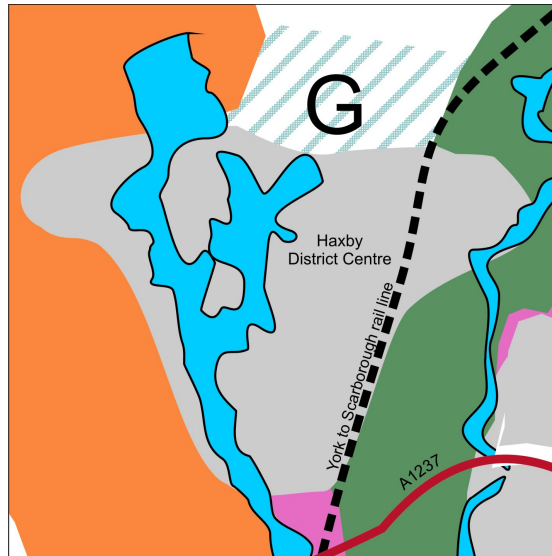


### Proposed Use

Mixed Use / Residential / Employment

## Area of Search G, North of Haxby (or parts of)

Carter Jonas: Ref: 2527, 2528, 2537, 2688, Persimmon Homes: Ref 161

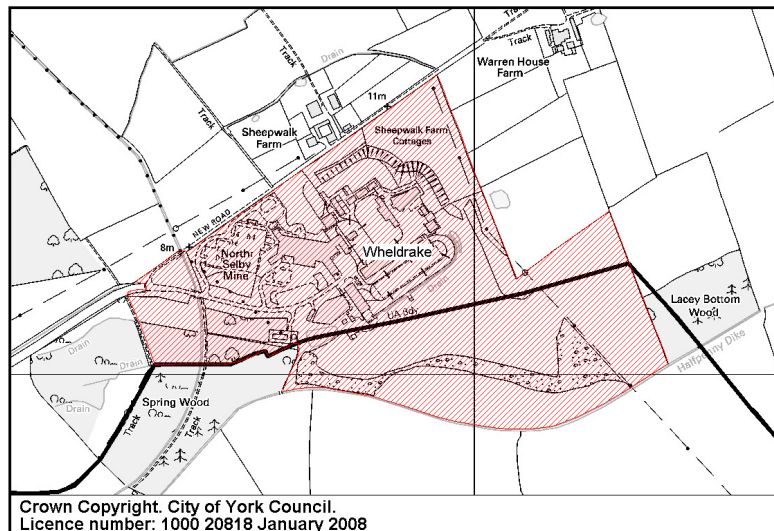


### Proposed Use

Residential

## North Selby Mine

UK Coal Mining Ltd: ref 515



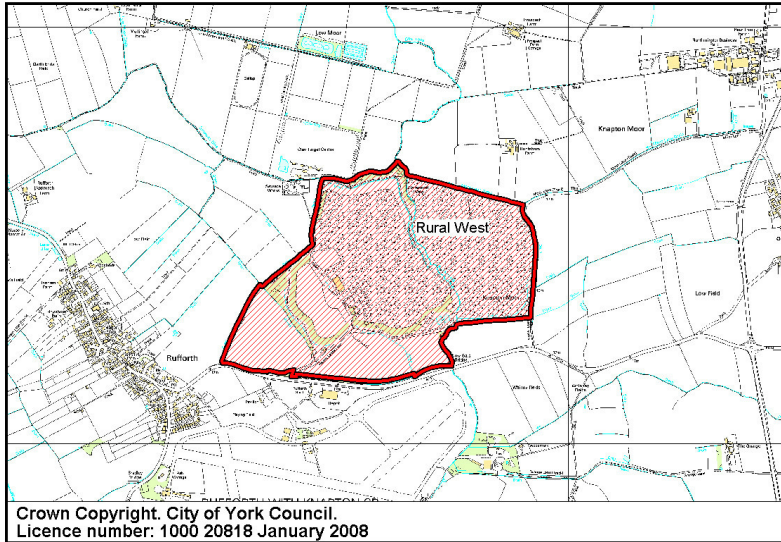
### Proposed Use

Renewable Energy with associated Science City York related employment use



## Harewood Whin Waste Site, Rufforth

Yorwaste: ref 608



### Proposed Use

Waste disposal

### Other Areas

A number of respondents referred to other areas which they thought should be considered as alternative areas of search. However, they did not provide maps or clearly cross refer to plans previously submitted for the Allocations DPD. These areas are set out in the table below.

Area/Description	Proposed Use	Respondent
Land to the north of Clifton Moor	Residential	Commercial Estates Group and Hallam Land Management (2698)
Area of Search A should be extended to include land up to the A1036	Residential	Land and Development Practice (568)
Land west of A19, Fulford	Residential	Land and Development Practice (568)
Land to the north east and west of Nether Poppleton	Residential	Carter Jonas (2527, 2528, 2537, 2688)
Land to the north east and west of Knapton (part of Area of Search E)	Residential	Carter Jonas (2527, 2528, 2537, 2688)
Part of Area of Search F	Residential	Carter Jonas (2527, 2528, 2537, 2688)

Area/Description	Proposed Use	Respondent
Urban extension to the north of Haxby	Residential	Barratt Homes (2526)
Some land to the West of the City	Residential	Miller Homes (546)

### Smaller Sites

A number of other smaller sites (less than 10ha) were also referred to in the responses, these are not considered to relate to strategic growth and will be considered through detailed work on the Allocations DPD. These are listed in the table below.

Site/Area	Size	Proposed Use	Respondent
Land around Designer Outlet	Not specified	Major Developed site in the Green Belt – reassess boundaries	Dobbies (2507)
Land adjacent to A1079, Grimston Bar	4.86ha	Mixed Use	Lands Improvement (2517)
Local Plan Reserved Land adjacent to Grimston Bar Park and Ride	10ha	Employment	Tangent Properties (2687)
Wilberforce Home, Tadcaster Road	8.9ha	Residential	The Wilberforce Trust (2576)
Foss Bank Farm, Earswick	3.21ha	Residential	Strutt & Parker (2624) and Mrs Barker (605)
Land at Strensall	3.8ha	Residential	Carter Jonas (2527, 2528, 2537, 2688)
Land south of Ferguson Way, Huntington	0.91ha	Residential	Barratt Homes (2524)
Askham Bryan College	Not specified	Major Developed site in the Green Belt - reassess boundaries	Askham Bryan College (276)
London Bridge	Not specified	Sports and Open Space Facilities	York College (282)
Land adjacent to York College	Not specified	Educational uses	York College (282)

Site/Area	Size	Proposed Use	Respondent
Ponds Field, Field Lane, Heslington	5.7ha	Residential	Persimmon Homes (161)
Westfield, Wigginton	7.7ha	Residential	Persimmon Homes (161)
Common Lane, Heslington	5.1ha	Residential	Persimmon Homes (161)

## 10. The Role of York's Green Belt

### Planning York's Future Questionnaire

**Question 7: Do you think that it is appropriate to identify land for development in the draft Green Belt?**

- a. Housing
- b. Employment

- In terms of identifying land on the draft Green Belt for housing, two-fifths (40%) of respondents agreed with this. However three-fifths (60%) disagreed.
- 39% of the sample agreed with identifying land for employment on the draft Green Belt, whilst 61% did not.

**Question 8: If we need to identify land for new homes do you think that areas A and B, currently in the draft Green Belt, are the most suitable locations? If no, which other areas would be more suitable?**

- Two-thirds (67%) of respondents agree that areas A and B are suitable locations for building new homes. The remaining third (33%) do not agree. Half of these did not suggest an alternative, of those that did the main areas identified were:
  - Area E
  - Area F
  - Area D
  - Brownfield sites only

**Question 9: If we need to identify land for employment do you think that areas C and/or I are suitable locations for industrial and distribution employment areas? Which other areas would be suitable?**

- Over half (58%) of all respondents believe area C is suitable for industrial and distribution employment, whilst 41% agree with area I. The remaining 17% of the sample said that neither area C or I are suitable locations.
- Respondents were given the option of suggesting alternative areas for industrial and distribution employment, with the main areas identified as:
  - 3% Area A
  - 2% Area E
  - 2% Area F

- 1% Area H and D

## Core Strategy Preferred Options Document

### Question 4:

Please tell us what you think of the Council's preferred approach to the Green Belt. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you feel that the importance of York's historic character and setting is adequately reflected in this section?
- b) Do you feel that this should be regarded as the primary purpose of the Green Belt?
- c) Do you think that York's Green Belt proposed lifespan of 20 years is appropriate?

### General Comments

1. The section should explain that land is not being removed from Green Belt, but that detailed inner and outer boundaries are being defined for first time in a statutory development plan.
2. The principals behind the Green Belt Appraisal are supported but the document omits some areas in need of protection and may make areas not included vulnerable to development. It should therefore be reviewed as should the City Landscape Character Assessment.
3. The common sense approach would be to define what the extent of the Green Belt should be according to PPG2 criteria. When sites available outside Green Belt have been built on then there are no sites left to accommodate any further growth.
4. Fails to fully explain land supply shortfall and consequence of not supplying enough housing.
5. Sites should be released from the Green Belt earlier in the plan period given the lengthy timescales involved in identifying and adopting such sites, bringing them forward for development and coordinating with infrastructure delivery. To relegate this activity until after allocated sites, within city boundary, have been built out would be too late.
6. Some housing could be allocated in surrounding villages within the Green Belt boundary, but this option will be constrained as supply will be limited to a smaller number of brownfield sites in those settlements.
7. Area C runs directly counter to policy. If Derwenthorpe and area B come to fruition, and supply apparent need for housing, pressures on the infrastructure of surrounding villages (Stockton, Holtby and Murton) are inevitable. It erodes further the green wedge into York from the East and the rural character surrounding Murton.
8. The issue of Green Belt release will to a large extent be dependent upon delivery of York Central. Therefore the more certainty that can be given within the emerging policy framework to guaranteeing the delivery of York Central, the less the impact will be upon York's Green Belt.
9. It is important when setting Green Belt boundaries that a degree of flexibility is built into the plan to reflect future development needs particularly given the ongoing review of housing growth and capacity

- figures which will feed into IRS.
10. PPG2 states that the establishment of permanent Green Belt boundaries may mean safeguarding land between the urban area and Green Belt, which may be required to meet longer-term development needs beyond 2030 (GOYH and LGYH).
  11. A flexible approach to development on Green Belt land outside identified areas should be adopted. This would include sites which do not contribute to preservation of the city's historic character.
  12. A plan, monitor and manage approach should be adopted to avoid any significant premature release of housing land.
  13. The approach should reassess the boundaries and policy basis of 'Major Development Sites in Green Belt'.
  14. To protect the historic character and setting of York, Green Belt land has to be released at appropriate locations around the current development boundaries.
  15. Green wedges are a key contribution to the setting of York. These have focused on rivers and strays. Main arterial roads, such as A59, should also be recognised as contributing to setting forming green fingers running into city.

**Do you feel the role of York's Historic Character & Setting is Adequately reflected?**

1. The approach needs to recognise the essential role that revising the Green Belt boundary will play in enabling York to grow in a way that preserves its special character and setting and ensures sustainable development.
2. Green Belt should also seek to preserve those areas which regulate the size and shape of the city and thus help to safeguard the city from adverse effects which might arise from unregulated growth (English Heritage).
3. Is the size of and main built-up area of York a key element of its special character. If so how big should York grow (and in what direction) before that aspect of its character is eroded?

**Should York's Historic Character & Setting be regarded as the Primary Purpose of the Green Belt?**

1. It is inappropriate to seek to redefine or extend higher order RSS policy as to purpose of Green Belt, by seeking to add the concept of coalescence with other settlements and villages.
2. It is not the role of Core Strategy to bestow any relative levels of importance to the five purposes of Green Belt. It should not, therefore, make any reference to what may or may not be considered to be the primary purpose of Green Belt.
3. The primary Green Belt purpose in paragraph 1.5 of PPG2 'to preserve the setting and special character of historic towns' is the most important in York's case. Should be more positive. Green Belt also has a role in enhancing historic character and Setting (GOYH).
4. The primary purpose of the York Green Belt is to safeguard the character of the historic city, which might be endangered by unrestricted

expansion. This has been reaffirmed throughout the years by Ministerial statements and by numerous Inspectors' decisions on Appeal (English Heritage).

5. Whilst York Green Belt performs a number of other functions listed in PPG2, these are secondary to the primary purpose of safeguarding the special character and setting of a historic City (English Heritage).
6. To define a Green Belt, need to identify which elements of the City contribute to its "special character" and "setting" and then based on these, where do Green Belt boundaries need to be defined in order that those elements are preserved (English Heritage)?
7. Other purposes which should be added to Policy CS1 are: to prevent urban sprawl, specifically to prevent further infill development up to inner ring road; areas of open green setting should be retained where possible between the main urban area and the ring road; to help protect the countryside around York for agricultural, recreational, conservation and amenity use; and to define limits to growth of the city in relation to its eco-footprint, carbon footprint and an Environmental Capacity Study.
8. Concern that too much emphasis has been given to just one of the purposes of Green Belt. Its fundamental aim is to prevent urban sprawl. Preserving the special character of historic towns is just one of a number of purposes.
9. While preserving the setting and special character of York is vitally important, it is also important that Green Belt continues to safeguard the countryside from encroachment, particularly as much of it around York is of high quality agricultural land (grade 1 and 2) and aesthetic quality. Landscape character and cultural heritage are key contributors to regional and local identity, influencing sense of place, shaping the settings of people's lives and providing a critical stimulus to their engagement with the natural environment, and should also be regarded as important (Natural England).
10. York's Green Belt can provide support for biodiversity in the York area for example by providing feeding areas for farmland birds.

**Do you think that the proposed lifespan of 20 years is appropriate?**

1. Lifespan of 20 years is too long and will need to be reviewed as the city expands.
2. Support boundaries being set to endure beyond RSS period to at least 2030. Any revision must take into account a potential increase in housing allocation from 2026 - 2030 in IRS, thus requiring more Green Belt land for development.
3. The lifespan should be a minimum of 20 years.
4. The lifespan appears appropriate. However 20 years is a very short time in relation to the development of native woodland, which would need protection from development for a far longer period to become a valuable resource.
5. The approach only extends beyond the RSS plan period by 3 years. This is not considered to constitute "...endures beyond the RSS period". A review of Green Belt would be required before the end of 20 years to identify and deliver any growth requirements after the 20 years has

- expired. Advocate that a longer period of 30 or 40 years is set.
6. The plan period should be 15 years from adoption. Setting Green Belt boundaries based on meeting development needs for an additional four years up to 2030 may not be enough to provide sufficient flexibility. Paragraph 8.13 appears to indicate some flexibility in the amount of development that could be accommodated in the proposed urban extensions, this may mean that the end date could be pushed back without needing to identify additional safeguarded land (GOYH).
  7. If the timescale of the RSS is to 2026, it follows that the life of the Green Belt should be longer. However, given that "permanence" being suggested is only four years longer than end date of RSS, it seems somewhat less "permanent" than envisaged in national guidance. However, worth noting that Green Belt Local Plan Inspector considered that: - "...*mathematical precision is not really relevant in a context where change should only occur as a result of wholly unforeseeable changes of circumstance*" (English Heritage).
  8. A 2030 deadline should be a minimum. To provide sufficient land, the Green Belt boundary needs to contain sufficient land to allow for changes in circumstances.
  9. The approach of setting boundaries of Green Belt for a minimum of 20 years is appropriate (Yorkshire Forward).
  10. The Green Belt should reflect the lifespan of RSS and not go beyond it on the basis that development needs beyond RSS are currently unknown and there maybe a need to release Green Belt land in future to meet York's development needs.

## 11. York City Centre

### Planning York's Future Questionnaire

**Question 13:**

**Following a recent employment study, we have identified the following areas for new office development. Please tick those that you feel are appropriate:**

- **York City Centre**
  - **A new office quarter at York Central**
  - **As part of the redevelopment at Layerthorpe**
  - **As part of the redevelopment at Terry's**
  - **As part of the redevelopment at Nestle**
  - **Monks Cross**
- Over two-thirds (69%) of respondents agree with a new office quarter at York Central. 58% of the sample agree with office development as part of the redevelopment at Terry's, whilst 56% said as part of the redevelopment at Nestle.
  - Just over half (51%) of respondents think office development should be at Monks Cross, whilst 48% said as part of the redevelopment of Layerthorpe.

- Respondents were least likely to agree that office development should be in York city centre (37%).
- Respondents were given the opportunity to add any further comments about office development. The main comments were
  - Ensure that there is a good public transport infrastructure.
  - There are enough sites which should be used or redeveloped.
  - Ensure they have car parking spaces.

**Question 14: Whilst York City Centre will remain the focus for shopping development, there are limited opportunities to increase the number of shops. This is important in maintaining York's role as a key shopping location allowing for competition with other key shopping locations. We think that the following locations maybe suitable for new shops. Which do you feel are suitable?**

- a. Castle Piccadilly
- b. Stonebow area
- c. York Central (behind the station)
- d. Other (please specify)

- Nearly two-thirds (64%) of respondents think that new shops should be developed in the Stonebow area, whilst 52% said Castle Piccadilly.
- 30% of respondents thought that new shops should be built at York Central.
- Respondents were also given the opportunity to suggest alternative locations, to which the main comments were:
  - Brownfield sites
  - Hungate
  - Monks Cross
  - There are enough empty shops in York which should be filled first.

## **Core Strategy Preferred Options Document**

### **Question 5:**

Please tell us what you think of the Council's preferred approach to the city centre.

- a) Do you think that we are taking the right approach to supporting the city centre as the cultural, economic and social heart of York?

Question 12 on retail is also relevant to the city centre and is covered under Section 18 ('Retail') of this summary document.

### **General**

1. The approach should be more positive to ensure that the centre develops its role as the primary focus for retail, leisure, tourism and office development.
2. The section should provide a stronger hook for the Area Action Plan (AAP) with a diagram and mini brief (GOYH).



3. The policy should contain more detail as to the scale of development proposed for the city centre; the range and mix of uses; and the infrastructure needed to achieve this.
4. The policy should define the city centre boundary (GOYH).

### **Historic Environment and the Public realm**

1. The intention should be to enhance and utilise the historic environment as a resource to deliver wider economic and social benefits (English Heritage).
2. Strongly support the intention to enhance and extend the public realm (English Heritage), particularly public spaces; gateway streets; and footstreets.

### **Offices and Business**

1. City centre sites in need of regeneration should be the focus of economic development. We should use all available elements of the city centre, such as space above shops and empty buildings before out of centre locations.
2. Conversely, it was suggested that the city centre is limited in what it can offer to business.
3. It is confusing to refer to both the city centre and YNW as 'the focus' for office development.

### **Tourism, Culture and the Evening Economy**

1. The section should place more emphasis on the evening economy and tourism and cultural opportunities (includes GOYH).
2. The city centre could be preserved as a tourist and cultural destination with functions such as other economic activities and residential moved out of the centre.

### **Residential Development**

1. Whilst there are opportunities to provide new homes within the city centre, capacity should be based on the SHLAA and assessments of delivery.

### **Transport, Access and Air Quality**

1. There is a need to reduce the physical and environmental impact of traffic (English Heritage). A key aim of the AAP should be to protect air quality and deliver the Low Emission Strategy.
2. Options for the footstreets and city centre parking need to balance maximum accessibility for shoppers, visitors and goods with the overall attractiveness of the city environment.
3. The approach needs to consider accessibility for all within the city centre.

### **Green Spaces and Open Spaces**

1. There are benefits to providing new and enhanced green spaces in the city centre (Natural England) including biodiversity; climate; flood mitigation; and encouraging walking and cycling.

**York Central**

1. The policy should emphasise the importance of linking the city centre and York Central highlighting the future role the latter will have in supporting the city centre, particularly though the provision of retail and employment.

**Retail**

1. Many of the comments made under Section 18, retail are also relevant to the city centre.

## 12. York Northwest

### Planning York's Future Questionnaire

**Question 13:**

Following a recent employment study, we have identified the following areas for new office development. Please tick those that you feel are appropriate:

- York City Centre
- A new office quarter at York Central
- As part of the redevelopment at Layerthorpe
- As part of the redevelopment at Terry's
- As part of the redevelopment at Nestle
- Monks Cross
  
- Over two-thirds (69%) of respondents agree with a new office quarter at York Central. 58% of the sample agree with office development as part of the redevelopment at Terry's, whilst 56% said as part of the redevelopment at Nestle.
  
- Just over half (51%) of respondents think office development should be at Monks Cross, whilst 48% said as part of the redevelopment of Layerthorpe.
  
- Respondents were least likely to agree that office development should be in York city centre (37%).
  
- Respondents were given the opportunity to add any further comments about office development. The main comments were:
  - Ensure that there is a good public transport infrastructure.
  - There are enough sites which should be used or redeveloped.
  - Ensure they have car parking spaces.

**Question 14: Whilst York City Centre will remain the focus for shopping development, there are limited opportunities to increase the number of shops. This is important in maintaining York's role as a key shopping location allowing for competition with other key shopping locations. We think that the following locations maybe suitable for new shops. Which do you feel are suitable?**

- a. Castle Piccadilly
- b. Stonebow area

**c. York Central (behind the station)**

**d. Other (please specify)**

- Nearly two-thirds (64%) of respondents think that new shops should be developed in the Stonebow area, whilst 52% said Castle Piccadilly.
- 30% of respondents thought that new shops should be built at York Central.
- Respondents were also given the opportunity to suggest alternative locations, to which the main comments were:
  - Brownfield sites
  - Hungate
  - Monks Cross
  - There are enough empty shops in York which should be filled first.

## **Core Strategy Preferred Options Document**

**Question 6:**

Please tell us what you think of the Council's preferred approach to York Northwest. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think that we are promoting the right mix of uses to ensure the creation of sustainable new communities on York Northwest?

### **Policy and General Approach**

1. The section should provide a stronger hook for the Area Action Plan (AAP) with a diagram and a mini brief (GOYH).
2. The approach needs more justification and the development numbers need to be translated into the broader strategy (GOYH).
3. The Core Strategy should allow a flexible approach to York Northwest (YNW) allowing for it to be developed in the context of site specific policies contained in the AAP, detailed master planning and viability testing.
4. The site is a massive opportunity holding great significance for York and is essential to achieving the Core Strategy vision, but the proposals seemed to show a lack of ambition for the area.
5. The Core Strategy should define the boundary of the YNW site (GOYH).

### **The Two Sites**

1. The section should outline the distinction between the two sites, specifically with regard to the appropriate uses for each site, the mix, the quantum of development and phasing.
2. There is a need for a comprehensive approach to the two sites.

### **Integration and Links to City Centre**

1. Public realm and green infrastructure investment are important to integrate the area into the rest of the city centre.
2. The approach needs to clearly outline how the development would conserve and enhance the historic environment and historic assets in this part of the city (English Heritage).

### **Offices**

1. The strategy should recognise the opportunity YNW offers for the overall economic prosperity of the city, sub region and region.
2. York Central should be a commercial and employment led regeneration scheme.
3. The quantity of office development proposed on York Central is unviable and unrealistic.
4. There is no need for large scale office development near the station. The priority should be for smaller scale employment leaving more space for housing and leisure requirements.

### **Housing**

1. The realistic capacity of the site for housing still needs to be determined. This requires consultation with house builders, a completed SHLAA, a realistic delivery trajectory and decisions on the types of homes required.
2. The level of housing proposed for the site should be reduced.

### **Retail**

1. Retail development is appropriate on York Central. It will diversify the city centre, claw back leakage of expenditure and improve the city's market share.
2. There is no need for any comparison retail on the site.

### **Open Space and Nature Conservation**

1. It is important to include good quality open space, green infrastructure, sports and leisure facilities in the proposals and mitigate against the loss of important habitats. This may be difficult to achieve given the levels of development proposed.
2. The approach should be to develop other sites or areas of poor green belt land instead and then allocate areas of YNW as green space or parkland to continue York's green wedge theme.

### **Emissions, Air Quality and Land Contamination**

1. The development should consider land contamination issues (Environment Agency), seek to achieve low emissions and take account of air quality issues.

### **Transport and Access**

1. The policy should prioritise sustainable transport modes.
2. Problems with access to the site could act as a barrier to development.

### **Promoting the Right Mix of Uses?**

1. The proposed mix of uses is supported, specifically the site's potential to deliver residential, employment (particularly offices), leisure and retail uses.
2. The mix of uses should be dependent on those that would be needed to deliver the strategy (GOYH).

3. Other uses should also be considered, including culture, leisure and tourism opportunities near the Railway Museum; a conferencing/evening venue; and the new community stadium.

### **Sustainable and Inclusive Communities**

1. The Core Strategy should include a locally distinctive strategic sustainability policy that could signpost policies for a low carbon community at YNW (GOYH).

### **Delivery, Timescales and Constraints**

1. Delivery of YNW is uncertain and unrealistic because of infrastructure costs; over optimistic rate of delivery; inappropriate type and mix of development proposed; market conditions; and land assembly issues.
2. The Core Strategy is over reliant on YNW. It cannot rely on the site to deliver development targets, even in the longer term.
3. The strategy should include contingencies for delayed or no delivery on YNW; suggestions include: identifying other sites (including those in green belt) in the short and medium term; looking for early wins on YNW; and allowing individual or grouped sites within YNW to come forward.

## **13. York's Special Historic and Built Environment**

### **Planning York's Future Questionnaire**

#### **Question 10:**

**How important is fully understanding the special character of York in informing high quality new design?**

- Around four-fifths (79%) of respondents believe that fully understanding the special character of York in informing high quality new design is 'very important'. A further 14% think it is fairly important, whilst 2% said it is 'not important'

### **Core Strategy Preferred Options Document**

#### **Question 7:**

Please tell us what you think of the Council's preferred approach to York's special historic and built environment.

- a) This policy sets out a range of contextual guidance which would be expected to inform and support development proposals. Do you think that there are other studies which the Council or applicants should undertake to inform understanding of York's special historic and architectural context?

## **Understanding and Describing the City's Special Character**

1. The importance of understanding and describing the City's special character, and how this would influence or steer York's future development strategy is key. This is fundamental to all aspects of the Plan, and to all scales of development (GOYH/English Heritage). A vision promoting architectural and urban design excellence and excellent public spaces which can assist the economic image of the city is necessary.
2. Support for the protection of key views and the Council's commitment to undertake a future study to define and describe these including the Council's intention to carry out a views appraisal and other local character studies to explain what makes York 'unique'. Fully understanding the special character of York is very important in informing high quality new design.
3. Concern over the high level policy wording, whilst policies should capture the specific qualities of York, they should not be too prescriptive in the development process nor repeat national guidance. The importance of York's medieval city centre and network of streets and buildings is of significance. The Core Strategy policy should relate to city-wide design issues, detailed references to individual buildings or places are more relevant to an area action plan document.

## **Other Issues**

1. Support for the production of Conservation Area Appraisals, Parish Plans and Village Design Statements, and their appropriate adoption as Supplementary Planning Documents (SPD) to better understand what is special about the City (English Heritage).
2. Recommend the Local List be adopted as an SPD, and that the Council work with local community to define special building/places which are important in a local context, to reinforce an understanding of place at the local level (English Heritage).
3. Support for more detail to expand on criterion a) to more fully describe how best to manage York's heritage assets (English Heritage).
4. Additional guidance on the role of energy efficient and sustainable design in relation to historic built environment may be necessary.
5. The design policy should not be overly prescriptive. The reference in criterion b) to development respecting local form and scale should not rule out the opportunity for new and different architectural styles (e.g. York Northwest) (Yorkshire Forward). Each site needs its own guidelines as part of the planning brief. Both traditional and contemporary design has a role e.g. York Northwest could be contemporary where as Aldwark is a good example of traditional design. There is more scope to be visionary with the design of new buildings like in Cambridge, Seville and Bilbao.
6. Major investment in the public realm is essential in order to properly implement policy.
7. There is a need to consider all users requirements in the design of public space and buildings, and in debating alterations to (particularly historic) buildings. To assess individual planning applications 'Secured by Design' standards should be used, advice should be taken from the Police Architectural Liaison Officer.

# 14. Housing Growth, Distribution, Density, Mix and Type

## Planning York's Future Questionnaire

### Question 3:

**In light of the current recession, but given the long timescale of the plan (LDF) and housing pressures in York, do you think we should:**

- **Up to 2026, build 850 homes per year;**
- **Between 2026-2030, build 850 homes per year?**
  
- A third (33%) of the sample agree that we should build 850 homes per year, up to 2026. 8% said we should build more than 850, whilst three-fifths (59%) believe the number should be less.
  
- Again a third (34%) of respondents agreed that we should build 850 homes per year, between 2026-2030. Over half (57%) of the sample believe the number should be less than 850, whilst 9% think it should be more.

### Question 4:

**Do you think that the council should be allowed to include a higher level of windfalls in the plan (LDF)?**

- Just over three-quarters (77%) of respondents agree that we should be allowed to include a higher level of windfalls in the plan, whilst a quarter (23%) disagree.

### Questions 5:

**Would you be prepared to see more densely built developments than those which currently exist in your area to reduce the need for development on land currently in the draft Green Belt?**

- In order to reduce the need for development on land currently in the Green Belt, 46% of respondents said that they would be prepared to see more densely built development than those which currently exist in their area.
- However over half (54%) of the sample do not agree with more densely built development in their local area.

### Question 12:

- a) **Do you agree that we should build more houses (around two thirds) than flats (around one third)?**
- b) **Do you think that this should increase to a greater number of smaller properties, such as flats, towards the end of the plan period if this reflects the changing needs of York?**

- Over four-fifths (83%) of the sample agree that we should build more houses (around two thirds) than flats (around a third). 17% of respondents disagree that we should build houses rather than flats.
- Around two-thirds (68%) of the sample agree that towards the end of the plan period there should be an increase to a greater number of smaller properties if this reflects the changing needs of York. The remaining third (32%) did not agree.

## **Core Strategy Preferred Options Document**

### **Question 8:**

#### **Housing Distribution and Growth**

- a) Do you have any comments that the Council could reflect in their response to the emerging Integrated Regional Strategy? These could be, for example, in the relation to:
  - the role of York
  - regional housing requirements/housing growth
  - the inclusion of windfalls
  - the duration of LDF documents
- b) In light of the current recession, but given the long timescale of the plan (LDF) and housing pressures in York, do you think we should:
  - up to 2026, build 850 homes per year; and/or
  - between 2026-2030, build 850 homes per year?
- c) If we were able to use windfalls, this could reduce the amount of land we need to develop in the draft Green Belt. Do you think that the Council should be allowed to include a higher level of windfalls in the plan (LDF)?
- d) Do you think that by reflecting the spatial strategy set out in Section 3, that this section identifies an appropriate approach to guide the future allocation of housing sites?

#### **Housing Density, Mix and Type**

- e) the density levels put forward in this section are thought to be reasonable in terms of delivering the RSS housing figures in response to York's historic context and hierarchy of places. If you think that these are not suitable, please submit alternative evidence to support any proposed approach. Would you be prepared to see more densely built developments than those which currently exist in your area to reduce the need for development on land currently in the draft Green Belt?
- f) Do you support the SHMA findings, and the approach taken here, which aims to deliver 70% of new residential development as houses? If not, please provide evidence to support an alternative approach.
- g) Do you think that the mix of smaller properties (such as flats) should increase towards the end of the plan period if this reflects the changing needs of York?
- h) Policy CS5 (C) does not currently set a site threshold, but leave the application to the Allocations DPD, Area Action Plans and site by site negotiation. Do you think this is an appropriate approach, or that the policy should be more prescriptive in setting out the size of site/development to which it would apply?



- i) Do you agree that we should be trying to deliver 36 new Gypsy, Traveller pitches, as recommended in the North Yorkshire Gypsy and Traveller Accommodation Assessment, 2008? If not, please submit alternative evidence to support any proposed revised target.
- j) Are the listed criteria appropriate for assessing potential Gypsy, Traveller and Showperson sites. Should separate criteria be set out for these different communities?

## **Growth & Distribution**

### *General*

1. A housing trajectory is needed to show that the Core Strategy can deliver its housing requirement over the plan period (GOYH).
2. Housing figures should not be expressed as a 'cap', more a minimum target to be achieved.
3. Planning forecasts for housing should be based on need rather than demand which would suggest a significantly lower figure than 850 dwellings per year.
4. Impact of the recession should not be used as an excuse to renege on delivering the targets set. Instead should explore mechanisms and policy measures that will bring development forward.

### *Strategic Housing Land Availability Assessment (SHLAA)*

1. The draft SHLAA is over-reliant on brownfield sites, and does not consider additional greenfield land releases which may be required to accommodate growth.
2. The strategy is over-reliant on committed development sites (including York Northwest), which are unlikely to deliver and could undermine the strategy and result in a shortage of planned housing sites. The SHLAA has not tested the potential from areas of search. There may be significant constraints to development, making these areas unviable, or undeliverable within planned timescales.

### *Duration of the Plan*

1. Projecting housing requirements forward beyond 2026 will help to ensure permanency of the Green Belt.
2. Explore the impact of higher than RSS housing targets, particularly in the context of drawing a green belt that needs to endure (LGYH).
3. A long timescale would result in too many suppositions around housing numbers. Therefore the plan should look no further forward than the RSS.

### *Including Windfalls within the Housing Trajectory (8c)*

1. Windfalls are a realistic part of housing supply. There is no reason why unforeseeable sites should not come up within the earlier timeframe in the same way as beyond 2021 (includes North Yorks County Council).
2. Windfalls can be part of York's solution to housing growth and land supply by providing flexibility to deal with the possibility of higher housing numbers (LGYH).

3. Opposition to the inclusion of windfalls as this would be contrary to PPS3 (including GOYH). There is no justification to include them after 15 years.

*The Overall Approach (8d)*

1. The levels of housing growth are too high and this could affect what is special about the city, such as its walkability, access to green space and unique streets and views and the historic environment.
2. The targets contradict the aspirations elsewhere in the LDF such as protecting green infrastructure and reducing the city's ecofootprint.
3. Support for the overall levels of housing growth suggested, given that these reflect the requirements set out in RSS (includes comments from GOYH and Yorkshire Forward).
4. Emerging evidence base for the regional plan suggests targets closer to 1,400/annum, which points to the need for a more flexible approach to identifying potential sites in order to maintain a long-term green belt boundary (includes comments from North Yorkshire County Council and English Heritage).
5. Phasing should be left to the Allocations DPD.
6. There is a risk that urban extensions could be brought forward speculatively in the short term, if removed from the green belt.
7. More information is required about how the approach to housing distribution dovetails with the Allocations DPD. Other than the strategic sites there is little certainty at this stage over the broad areas of potential for further housing development (LGYH).

*Alternative Approaches*

1. The areas of search should be brought forward earlier in the plan period, potentially for specific uses, to help deliver the aspirations for priority housing development.
2. The strategy should consider a range of sustainable and accessible sites to meet housing demand. Areas A and B alone may not be enough to allow flexibility, particularly if windfalls are excluded. To this end the approach should refer to greenfield land releases, but not to specific areas.
3. For clarity, the policy would benefit from a clear definition of the role and meaning of strategic extensions, and also consideration of whether all urban extensions need to be 'strategic' in nature.

**Housing Density, Mix and Type**

*Density (8e)*

1. The approach to density should not be too prescriptive, it should be flexible to reflect needs. The policy should be expressed as an indicative range or as a minimum. Alternatively density should be determined on a site by site basis and set out in the Allocations DPD, AAPs or SPDs. This would take account of individual site circumstances and the need to protect character (including English Heritage).
2. Densities should only be applied to 70% of a development site area to allow for play space, amenity space and landscaping.
3. Density should be limited to 40 dph to provide family housing in the urban area.

4. The same densities should apply to all settlements of the same category.
5. Additional green belt land might be needed for housing because density assumptions are based on pre-credit crunch housing markets and because lower densities are needed to protect the historic character of the city.
6. Support for increasing current densities provided that policy prevents development which is detrimental to York's special historic, built and natural environment.
7. The evidence base should dictate density (i.e. SHMA) which should not be ignored to preserve a 'draft' Green Belt.

*Mix and Type (8f, g & h)*

1. The approach should be to mix different housing types to create more diverse neighbourhoods and offer more housing choices in a single area throughout a person's lifetime.
2. Some residential needs may not be compatible with other people's lifestyles e.g. those with severe mental health problems.
3. Flexibility is vital in delivering right mix, type and density to meet the needs of the emerging population. Targets should be set out in the Allocations DPD, AAPs or SPDs rather than the Core Strategy.
4. There is a need to provide a mix of housing which reflects the requirements of the SHMA, in particular family housing. The latter will be required to help make the city a high value employment location, as it will attract employees.
5. An exclusive focus on brownfield delivery at the start of the plan period will not deliver the housing mix required and will result in an oversupply of flats. The capacities identified for the city centre and York Northwest suggests that they will only be developed for flats.
6. The SHMA was produced before the housing slump and focuses too much on market demand rather than housing need. The SHMA should be regularly updated and the 60% target for houses reviewed.
7. Objection raised to the 60% target for housing, when the SHMA and other parts of the Core Strategy state a requirement for 70% houses.
8. More family housing will mean more land take. The approach should assess the ability of the City to accommodate this level of growth without harming its character (English Heritage).
9. The strategy relies too heavily on urban flatted development towards the end of the Plan period.

*Gypsies and Travellers (8i & j)*

1. The approach to gypsy, traveller and showperson's accommodation is not entirely in accordance with Circular 1/2006, because the LDF does not state that all provision can definitely be met through identified provision.
2. The 36 additional pitch requirement by 2030, is an under estimation and needs to be increased by a factor of 6.
3. The timescales should be brought forward, there is an urgent need for more sites, which cannot wait until 2030. Interim targets should be set to encourage site provision earlier in the plan period.
4. Locations for new sites should be identified in the same way as other housing sites because they need access to the same facilities and

services – rather than located in peripheral areas to avoid ‘amenity’ concerns.

5. The scale of need indicates that it may be necessary to allocate sites rather than rely on planning applications – this could be in the Allocations DPD or, depending on urgency of need, could consider strategic sites in the Core Strategy (GOYH).

*Student Accommodation*

1. Given York’s importance as a university city and concerns over student accommodation in residential areas, the strategy should include an approach to student housing which includes local guidelines, objectives and allocations (includes GOYH).

*Specialist Needs and Accommodation for the Elderly*

1. The elderly population is increasing and this could increase demand for specialist homes in the future.
2. More specific provision should be made for the elderly population through the designation of more sites for bungalows and sheltered housing.
3. There was discussion about whether older person’s housing should be separate from other housing types like at Hartrigg Oaks. Whilst it may be attractive to some this could be seen as creating segregated environments which would damage communities. Alternatively, housing for older people could include provision for social activities which could be shared by the wider community.
4. There was disagreement about whether the policy should require design standards, such as Lifetime Homes. Whilst some felt that this standard should be achieved in all homes by 2013, if not before. Others suggested that there will still be a need for specialist homes to meet specific needs and that people should move to more suitable housing types as their needs change.
5. The approach should consider older houses, and how these can be adapted for specialist needs and for the elderly.

## **15. Access to Affordable Housing**

### **Planning York’s Future Questionnaire**

**Question 11:**

**York is in a high demand area for affordable housing and need each year is higher than the total number of houses built. The Council currently negotiates with developers to provide up to 50% affordable housing on medium to large sites in the main built up area and on small to large sites in villages. Developers say this is too high. The 50% target can be reduced if evidence is provided to show that development is not viable at this level.**

**Should we:**

- a) **Continue to negotiate for up to 50% only on medium to large sites in the main built up area and on small sites in villages. On site provision would be prioritised;**

- b) Require a level of affordable housing on all sites in the city, increasing from 20% (on small sites) to 50% (on larger sites). In villages, continue the target of 50% on sites of two or more homes. On site provision would be prioritised;**
- c) Require a level of affordable housing or equivalent financial contribution (which could, for example, be used to buy existing empty properties) in both the city and villages increasing from 10% (on small sites) to at least 40% (on larger sites). Developers have an option to supply properties off site from their main development.**
- Over half (58%) of respondents think we should require a level of affordable housing or equivalent financial contribution in both the city and villages (option C).
  - A quarter (25%) of the sample agree with option B, to require a level of affordable housing on all sites in the city, increasing from 20% to 50%.
  - Respondents were less likely to choose option A (17%), which specifies that we should continue to negotiate for up to 50% only on medium to large sites in the main built up areas and on small sites in villages.

## Core Strategy Preferred Options Document

The Core Strategy Preferred Options document put forward 3 options for affordable housing. These were:

**Option 1** – Implement existing policy.

**Option 2** – Sliding scale requiring varying % levels from 1 dwelling increasing to 50% at 28 dwellings with different requirements for urban and rural settlements.

**Option 3** – Sliding scale requiring varying % levels from 1 dwelling increasing to 40% over 30 dwellings. No distinction between urban and rural.

### Question 9:

- a) Do you agree that we should be trying to achieve 43% of all housing being built as affordable as recommended in the SHMA (2007). If not, please submit alternative evidence to support any proposed revised target.
- b) Which option approach do you consider we should use to meet affordable housing need in York and why?
- c) Would you support developers having the option to supply affordable properties off site from their main development, by instead providing a financial contribution which, for example, could be used to buy existing empty properties?
- d) Commercial developments employ a wide range of employees and a proportion of these will be on a low income and will not be able to afford to buy a property. Unplanned commercial developments may therefore put a strain on existing housing stock. Other cities successfully operate a policy to secure financial contributions from new commercial development that

generate significant need for affordable housing. Do you consider that this is an avenue that York should explore?

- e) Do you consider that the options promote appropriate and fair methods to achieve the target of 43% of all homes being built as affordable? If not, what methods do you suggest?

**9 a) 43% Affordable Housing Target**

1. There is a need for a viability assessment to be undertaken to underpin emerging policies and ensure that the policy framework for delivering affordable housing is sound (including GOYH and Yorkshire Forward).
2. Delivery of affordable housing against the 43% (or 50%) target is challenging, regardless of the current economic climate.
3. The target should be aspirational only, with more weight given to providing the appropriate type of housing in the right locations.
4. Some support for the 43% target, which references the SHMA (2007) as its evidence base.

**9 b) Support for Options 1- 3 Posed**

1. Significant support for the 'sliding scale' approach to policy, (increasing provision as site size, and potentially economies of scale, increases), but much debate as to the appropriate levels and thresholds described in the options, and (as above) the overall target.
2. Lack of support for the existing Local Plan style policy.
3. The urban/rural differentiation is a positive element of the policy approach; or conversely it was suggested it could prejudice development in otherwise 'sustainable' villages.
4. Support for considering rural exception sites, both in providing affordable housing and in providing land for Gypsy and Traveller housing.

**9 c) Off-Site Contributions**

1. Support for supplying affordable housing through off-site contributions, particularly on smaller sites.

**9 d) Contributions from Commercial Development**

1. Requiring contributions towards affordable housing from commercial development has no basis in PPS3 and does not conform to the tests of Circular 05/2005. Affordable housing is not the responsibility of prospective employers, and could hinder a prospective employer from locating to York.

**Other Potential Approaches**

1. The policy should test proposals at a level of 40% (re RSS), on a site by site basis, assessing economic viability, potential risks to delivery, the levels of finance available, and using an up to date SHMA.
2. The approach should allow for a greater proportion of affordable homes to buy, as focusing on affordable let can be problematic in terms of development funding.

3. The approach should seek to match private sector delivery with further public sector initiatives.
4. The council should lobby government to increase social housing grant and allow them to spend up to 100% of their receipts directly on the provision of affordable housing.

#### **Other Issues**

1. A generic catch-all policy is inappropriate. Specific AAPs and site allocations should generate their own affordable target.
2. If the provision of affordable housing is considered to be a priority, then negotiations should prioritise contributions to affordable housing above other payments.

## **16. Access to Services**

### **Planning York's Future Questionnaire**

No questions relevant to Access to Services.

### **Core Strategy Preferred Options Document**

#### **Question 10:**

Please tell us what you think of the Council's preferred approach to access to services. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you feel that all the main services are covered in this section or do you think that any additional ones should be mentioned to achieve sustainable neighbourhoods?

#### **General**

1. The approach should be strengthened by including more specific measures and targets and should be supported by a SPD.
2. The policy should ensure that areas have good local amenities to cope with any new development. The approach to the location of development should consider how facilities to support new development can address the needs of existing communities. The Indices of Deprivation and Neighbourhood Action Plans in conjunction with local consultation should be used to assess gaps in provision.
3. The section should be split into a number of different policies covering: location of development; support for hospital development; support for university expansion; and policy on planning obligations.

#### **Types of Services**

##### *Local Services*

1. There is a need for places where people of all ages can meet formally and informally, particularly in the evenings.

2. Shared community facilities such as schools, multi-use community centres or multi-faith places of worship could be used by many different users, including the local police.
3. Community ownership and involvement in facilities is a key element of a sustainable community.
4. Local employment opportunities such as small business start-up units and the provision of employment and training facilities for young people are an essential element of a sustainable community.

#### *City Wide Services*

1. The LDF should ensure access to affordable leisure facilities and indoor and outdoor sports facilities.
2. The approach should consider provision of a 'showground' site in York.
3. The proposed stadium is a suitable location for new swimming facilities.
4. Conference and concert facilities should be considered as key services.

#### **Access and Location of Facilities**

1. People across the city should be able to walk to key services and have access to frequent public transport routes.
2. It may be appropriate to cluster services together in a central location in communities.
3. Accessibility should take account of the topography of a particular area.
4. Facilities need to be supported by populations of an adequate size.
5. The strategy should take a 3 tier approach, identifying city wide facilities, district facilities, and local facilities.
6. Housing for older persons and disabled people should be close to community facilities.

#### **Public Transport, Walking and Cycling**

1. The strategy should encourage walking and cycling and the use of public transport as well as improving access to services. This will contribute to achieving a low carbon economy (Natural England).
2. Public transport accessibility needs to consider those with learning difficulties or sensory impairments as well as the availability of wheelchair space.

#### **Protection of Existing Facilities**

1. The strategy should protect existing facilities. Before loss is permitted, developers should have to show that a facility has no community value and that there are other accessible facilities available in the area.

#### **Infrastructure and Deliverability**

1. Access to services should be a key element of York's infrastructure and delivery plan (Government Office) and inform the approach to developer contributions. The latter should consider both capital and revenue investment.

#### **Universities and Colleges**

1. The section should say more about proposals at each university and college.



## 17. Future Economic Growth

### Planning York's Future Questionnaire

**Question 2:**

**Do you agree with the number of predicted jobs?**

- a) Yes
- b) No, should be higher
- c) No, should be lower

- Just over two-fifths (43%) of respondents agreed with the number of predicted jobs.

- However nearly half (48%) of the sample believe the number of predicted jobs should be lower. The remaining 9% of respondents said that the number should be higher.

**Question 13:**

**Following a recent employment study, we have identified the following areas for new office development. Please tick those that you feel are appropriate:**

- York City Centre
- A new office quarter at York Central (behind York station)
- As part of the redevelopment at Layerthorpe
- As part of the redevelopment at Terry's
- As part of the redevelopment at Nestle
- Monks Cross

Over two-thirds (69%) of respondents agree with a new office quarter at York Central. 58% of the sample agree with office development as part of the redevelopment at Terry's, whilst 56% said as part of the redevelopment at Nestle.

Just over half (51%) of respondents think office development should be at Monks Cross, whilst 48% said as part of the redevelopment of Layerthorpe.

Respondents were least likely to agree that office development should be in York city centre (37%).

Respondents were given the opportunity to add any further comments about office development. The main comments were

- Ensure that there is a good public transport infrastructure.
- There are enough sites which should be used or redeveloped.
- Ensure they have car parking spaces.

## Core Strategy Preferred Options Document

### Question 11:

Please tell us what you think of the Council's preferred approach to future economic growth. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you agree with the level of job growth identified in table 3?
- b) Do you think that this approach will deliver the right number of sites in the right location to ensure that York continues to perform as an economically successful city?
- c) More specifically, given the amount of land needed for future employment uses, do you think that Area of Search C (Land North of Hull Road) and/or Area of Search I (safeguarded land at Northminster Business Park) identified on the Key Diagram (pull-out map at the front of the document) are suitable for industrial distribution employment uses?
- d) Do you think that the points highlighted in Policy CS10 will help to enhance York's economy with increased benefits for residents and visitors?

### General

1. The strategy should aim to strengthen the economy, replace lost jobs and encourage entrepreneurial activity but do so with zero or minimal growth.
2. Concern over the emphasis placed on the Future York Group Report.
3. The policy should be more locally specific with stronger links to the Historic City theme and City Centre AAP (GOYH).
4. The policy approach needs to be more ambitious to reflect the skills and businesses in York.
5. The approach should identify sites for 'clustering'.
6. Phasing of sites is critical for delivering a planned approach.

### Job Growth

1. Further work should be done to take account of 'real' market conditions not 'normal market conditions' and to establish implications of endorsing predicted employment forecasts.
2. The levels of growth proposed are too high for York. They are unsustainable, will have a negative impact on wildlife sites and biodiversity, increase levels of traffic congestion, effect local food production and increase greenhouse gas emissions. Also questioned the capacity of existing and planned infrastructure to absorb the continuation of past trends in job creation.
3. The proposed employment figures are significantly below those in RSS which could result in a potential soundness issue (GOYH).
4. The approach needs to take account of the predicted growth of the University, Science City York and knowledge based industry.
5. The approach to employment provision shows a lack of consistency. RSS and other employment figures are based on generically based figures i.e. including all forms of employment not just classes B1, B2, B8. This is not used throughout the strategy and the spatial principles are therefore at

variance with other employment statistics elsewhere within the LDF process.

### **Location of New Jobs**

1. Locating offices near the train station will encourage inward commuting.
2. Development should be located where employees can access the site using methods of transport other than the private car, however public transport infrastructure needs to be improved to accommodate new job growth.
3. City centre and urban area sites in need of regeneration should be the focus for economic development before Green Belt sites.
4. The approach should include more sites and choices for phased development and set time lines to reduce dramatic sprawl in short timeframes.
5. The strategy should include small scale employment for local needs through reinvestment in declining areas.
6. Question why some of the B1a offices are proposed out of centre when Sub Regional City Centres like York should be the focus for offices (GOYH).

### **Site Specific Comments**

1. Elvington Airfield and Business Park and the A19 corridor are suitable for employment uses.
2. Several of the large employment sites e.g. Layerthorpe, York City Centre, Monks Cross, Land North of Hull Road, York Central, Terry's, Nestle, and Heslington East will have a significant impact on the Strategic Road Network (Highways Agency).
3. There is little justification for area of search I and traffic problems on the outer ring road are likely to be exacerbated by the proposed Park & Ride.
4. The proposal to accommodate all R&D on Heslington East is in conflict with the outline planning permission which states that the R&D is restricted to University uses.
5. The approach should identify R&D beyond start-ups at the University.

### **Type of Jobs**

1. The definition of 'jobs' is too limited and it needs to reflect more non-B Class jobs such as hotels, restaurants and car showrooms.
2. The policy should be more flexible, allowing for the full range of employment uses to be accommodated on employment sites. Developments should also include a mix of tenure options.
3. The scope of the voluntary and community sector as an employer should be noted.
4. The approach appears to discount any attempts to revitalise any form of manufacturing and the development of small scale enterprises. The loss of traditional industries is creating gaps in communities and a general lack of confidence in new economies.
5. More should be done to widen the employment choices of non-graduates.
6. Different types of businesses should be actively attracted to the city, not just knowledge based industries.

7. There should be a flagship building in York which is fully accessible and sustainable where a variety of groups and organisations could work from. It was suggested that this could be part of the Community Stadium.
8. Question whether distribution centres are appropriate in York or whether they should be located away from the urban area near motorways.
9. The approach should place more emphasis on the rural economy and recognise its important role in supporting settlement viability. The LDF should also promote local food production and possible energy crops.
10. It is unclear how the loss of existing stock will be addressed through the allocation of new sites.
11. While no land requirement for B1(c) or B2 uses is identified, new sites will need to be allocated to accommodate forecast changes within individual sites and this should be reflected.
12. The proposed significant increase in B8 floorspace is not aligned to the RES and other parts of region are better suited to providing allocations for these (Yorkshire Forward).

### **E d u c a t i o n   a n d   T r a i n i n g**

1. The approach should acknowledge the significance of Askham Bryan College as it provides specialist land-based education and training of national and regional importance.
2. The strategy should address concerns about the impacts of additional students and the University expansion.
3. The approach should be strengthened to support increased levels of training and development for the current, and future, workforce.
4. Planning agreements should be used to secure training facilities for disadvantaged groups and to improve access to buildings and IT.
5. We need to introduce a policy to ensure students are retained in the city.
6. The word 'modern' should be inserted in 'A Prosperous and Thriving Economy' theme in the Vision.
7. Developments and construction sites should have a real benefit to those in learning through apprenticeships, work experience for 14 -19 year olds, and undergraduate and graduate internships.

### **C u l t u r e   a n d   T o u r i s m**

1. The importance of tourism to the economy of York should be given greater emphasis. Although the city should not rely too much on one industry, like tourism.
2. The section should include reference to possible improvements to entertainment provision in York.
3. The approach should promote sustainable tourism by focussing on attracting regional and UK based visitors by rail rather than international ones by air.
4. The city is deficient in cultural diversity and has a poor evening economy. City centre investment and regeneration must benefit the day and night time economy.
5. The city needs a new high quality conference venue and more high quality hotels in the city centre.

### **Positive Aspects for Business in York**

1. Aspects that make York good for business need to be better promoted such as the natural environment, high quality public realm, the river, historic context, and heritage.

### **Barriers for Business**

1. Traffic congestion especially on the ring road is one of the most significant problems for business in York.
2. The fragmented public transport system impacts negatively on business.
3. City centre car parking is poor and a disincentive for businesses locating to York.
4. The general lack of space in the city centre is a problem for business and there are no large areas for business in the wider area which might put off some companies who require large floorspace.

### **York's Role in the Region**

1. The approach needs to show York's economic role as a sub-regional city.
2. York's role within the LCR as a 'key driver' should be emphasised, specifically the role of Science City York and the importance of tourism.

## **18. Retail Growth and Distribution**

### **Planning York's Future Questionnaire**

#### **Question 14:**

**Whilst York City centre will remain the main focus for shopping development, there are limited opportunities to increase the number of shops. This is important in maintaining York's role as a key shopping location allowing competition with other key shopping locations. We think that the following locations may be suitable for new shops. Which do you feel are suitable?**

- A) Castle Piccadilly**
- B) Stonebow area**
- C) York Central (behind the station)**
- D) Other (please specify)**

- Nearly two-thirds (64%) of respondents think that new shops should be developed in the Stonebow area, whilst 52% said Castle Piccadilly.
- Respondents were less likely to agree that new shops should be built at York Central (30%).
- Respondents were also given the opportunity to suggest alternative locations, to which the main comments were:
  - Brownfield sites
  - Hungate
  - Monks Cross
  - There are enough empty shops in York which should be filled first.

**Question 15:**

After the city centre, two district shopping centres are currently identified at Acomb and Haxby. District centres generally serve a local neighbourhood and contain a range of shops and services such as banks, building societies, restraints as well as local public facilities such as a library. Do you think that there are any other district centres in York?

- 78% of respondents did not suggest any other district shopping centres in York. Of those that did the main areas were:
  - 6% (n=142) Bishopthorpe Road
  - 4% (n=88) Fulford
  - 3% (n=59) Heslington
  - 2% (n=55) Heworth
  - 2% (n=44) Clifton
  - 1% (n=30) Huntington
  - 1% (n=25) Strensall
  - 1% (n=23) Copmanthorpe

**Core Strategy Preferred Options Document**

**Question 12:**

Please tell us what you think of the Council's preferred approach to retail growth and distribution. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think that this section addresses the role of York as a sub regional shopping centre by ensuring that the correct amount, type and location of retail development will be delivered?
- b) Do you think that Castle Piccadilly, the Stonebow area and York Central are suitable locations for new shops, or are there other areas which you think are more suitable?
- c) Two district shopping centres and currently identified at Acomb and Haxby. District centres generally serve a local neighbourhood and contain a range of shops and services such as banks, building societies and restaurants as well as local public facilities such as a library. Do you think that there are any other district centres in York?

**General**

1. It is essential to the economic well being of York that retail in the city centre continues to thrive (English Heritage).
2. York does not need to strengthen its role as a sub-regional shopping and entertainment centre.
3. There is a need for further analysis and assessment of York's retail issues, including diversion of high valued goods to out-of-town locations; accessibility by car for high value goods and ancillary social and cultural needs; improved town centre management; and key anchors for expanded retail offer.
4. Links with the historic city theme and City Centre AAP needed expanding (GOYH).

5. The approach may need to include a criteria-based policy for handling applications, if PPS6 and RSS are not sufficient (GOYH).

### **Retail Targets**

1. The target to increase market share to 34% is too high. Doubt whether it is achievable without having an unacceptable impact on the city (English Heritage).
2. The target to increase market share to 34% is too cautious. The approach should aim for a market share of at least 37% to continue to compete and to achieve sub-regional role.
3. Enhance retail provision in York, it is in need of a large department store.
4. There are limited opportunities for additional floorspace in the city centre so the LDF should seek to increase market share for York as a whole.

### **Expanding Central Shopping Area**

1. The strategy should not include any major expansions or extensions to the central shopping area.

### **Location of New Shops**

1. New shops at Castle Piccadilly and York Central may compete with the city centre.
2. Castle Piccadilly and Stonebow are suitable areas for new shops.
3. York Central is identified as one of the most appropriate sites for large scale retail development.
4. Brownfield sites, underused, old and empty units should be developed for retail use, whilst keeping historic facades.
5. Castle Piccadilly should be developed in a limited way to protect the setting of Clifford's Tower and to allow for the provision of open space, cultural and residential uses.
6. Non-retail uses (such as major banks) which currently occupy large units in the prime retail area should be encouraged to relocate to the proposed office/business quarter at York Central freeing up space for retail in the city centre.

### **District Centres**

1. Only Haxby and Acomb should be designated as district centres.
2. The LDF should identify more district centres, including Clifton Moor, Monks Cross and a new centre in the east of the city.

### **Convenience Shopping and Supermarkets**

1. New convenience shops should be directed to existing centres and areas where there is an identified deficiency.
2. The approach should seek to improve and enhance Newgate Market and other market provision.

### **Independent Retailers and Diversity of Shops**

1. The LDF should seek to maintain and protect the unique variety and diversity of shops and non-retail uses which are characteristic of York.

### **Out of Centre Retail**

1. The section should clarify the role of York's out of centre shopping locations. They have a role in meeting future retail and leisure needs to support the city centre and should have better transport links to the rest of the city.

## **19. Sustainable Transport**

### **Planning York's Future Questionnaire**

#### **Question 16:**

**A key role of the plan (LDF) is to promote sustainable development, this includes addressing the issues of climate change. Which of the methods below, do you think will be most effective in York?**

- a) By promoting renewable energy on site (e.g. solar panels)**
- b) By promoting renewable energy off site (e.g. wind turbines)**
- c) Promoting sustainable design and construction techniques**
- d) Providing alternative means to landfill to dispose of waste**
- e) Ensuring that new development does not add to the flooding and drainage problems in York**
- f) Encourage low emission transport systems**
- g) Other \_\_\_\_\_**

(NB: Only f) and g) are relevant to transport)

- 62% of respondents agreed with encouraging low emission transport systems
- 'Other' suggestions include
  - ensure that there is a good provision of public transport or encourage people to use public transport or encourage people to use public transport
  - provide more cycle paths and cycling facilities
  - reduce the use of cars.

#### **Question 17:**

**The approach to transport set out in the plan (LDF) aims to minimise the need to travel thereby reducing congestion and reliance on the private car. It will help achieve this through encouraging walking and cycling and the use of public transport in addition to improving access to services. Do you agree with the above approach for transport?**

- Over four-fifths (86%) agree with the approach for transport, which aims to encourage walking and cycling and the use of public transport as well as improving access to services.
- The remaining 14% of the sample did not agree with the proposed approach.



## Core Strategy Preferred Options Document

### Question 13:

Please tell us what you think of the Council's preferred approach to sustainable transport. Please feel free to give any comments you consider appropriate but in particular:

a) Do you feel that this section adequately supports sustainable forms of transport to reduce traffic congestion and address other key transport issues in York?

### Transport Objectives and Targets

1. The targets are too general and unlikely to achieve the objectives.
2. The strategy should be seeking to significantly reduce traffic levels in peak period overall, not just to reduce level of growth.
3. A target to see a reduction in bus journey times at peak periods would be a more appropriate key measure than car journey times.

### Policy Approach

1. The approach needs to be firmer, particularly where transport improvements are required to ensure delivery of other parts of the strategy.
2. The approach should not be seen as anti-car but about increasing road capacity for those who need to use the roads such as emergency vehicles, buses and disabled drivers.
3. The policy should contain more measures that will achieve RSS requirement to implement stronger demand management.
4. The approach should include improved connections to Hull and the East Riding, connections through Hull to the continent as well as international connections through nearby airports.
5. Improving the Strategic Road Network will only be considered as a last resort, even if extra capacity is to be funded by the private sector. Instead, developers should be encouraged to provide a range of sustainable travel options for people using their development through use of Travel Plans (Highways Agency).
6. New development must be focussed in the most sustainable and accessible locations to minimise the need to travel.
7. There has been no assessment of how the proposed transport measures might impact upon the character and setting of York (English Heritage).
8. Measures encouraging more walking and cycling can also lead to increased contact with the natural environment, particularly if links into green infrastructure are made.
9. It is important to adopt a flexible approach to transport and allow the provision of a range of transport modes.
10. The strategy should be more creative in designing places, considering 'home zones' for example or underground parking to create streets which are free of cars.
11. Introduce car share facilities and schemes.

### **Funding and Delivery**

1. The approach should include more information outlining how improvements will be funded.
2. Deliverability needs to be emphasised with consideration of whether there is a need for fallback scenarios (GOYH).
3. Existing and future transport infrastructure should be part of an infrastructure plan and will need to show how this provides a steer for the development of places. The approach should show which spatial strategy options perform best in relation to transport infrastructure as part of the audit trail in the Sustainability Appraisal (GOYH).
4. Concern about committing to future development in the vicinity of the ring road that relies on identified improvements taking place, or on rail improvements, unless suitable funding regimes are identified. While some improvements to the northern outer ring road are probably necessary to improve congestion, it is likely to be an expensive process for which only partial funding has been identified. Need to consider implications for future development if not possible for projects to progress to completion (Yorkshire Forward).
5. Concern about the objective to 'maximise the potential ... of potential rail station' as any critical infrastructure must be deliverable. It is unacceptable to allocate development on the basis of a potential station, without an identified source of funding and delivery mechanism (Highways Agency).

### **Sustainability and Climate Change**

1. Ensuring there is a good provision of public transport to encourage people to use it, reducing the use of cars and providing more cycle paths and cycling facilities will be effective in promoting sustainable development in York.
2. The strategy should include a target to significantly reduce traffic levels over the plan period as part of the city's Climate Change Strategy to reduce CO2 emissions and meet legal air quality limits.
3. The section should tackle climate change which is an obligation in respect of York's Climate Change Strategy and the Climate Change Act 2008.

### **Air Quality**

1. Stronger, more effective action is required to meet the legal requirements of Air Quality Management Areas.
2. The approach should refer to the need to move towards use of low emission vehicles, develop low emission infrastructure and support a Low Emission Strategy.
3. Include an objective to reduce the total emissions of carbon dioxide and oxides of nitrogen by limiting provision for private car parking and prioritising low emission forms of transport.
4. The key actions and delivery mechanisms are mostly long term and insufficiently radical to stem growing incidences of congestion and air quality levels.

### **Congestion**

1. To alleviate congestion the outer ring road should be dualled or a congestion charge could be introduced one day a week.
2. This section does not adequately address traffic congestion.
3. Transport issues and in particular congestion need to be solved before looking at any more growth.
4. The approach should recognise that provision of jobs in rural areas can lead to less congestion in the city.

### **Outer Ring Road**

1. Proposed major new development places further pressure on the outer ring road which is counterproductive.
2. Measures proposed for the outer ring road are inconsistent with the strategic objectives, a waste of resources and will produce negative consequences.
3. Consultant's costings have shown no cost benefit justification for dualling the outer ring road.

### **Road Improvements**

1. The approach should support proposals to improve highway or transport infrastructure in association with development proposals which have not been anticipated within LTP2.
2. Support for comments in Sustainability Appraisal that road improvements must be queried, as short term reductions in congestion are likely to be lost in the long term through rapidly increasing car use and increased emissions.

### **Proposed Freight Centre/HGVs**

1. Further information is needed about the proposed freight centre on the outskirts of York to assess potential implications on Strategic Road Network (Highways Agency).
2. The policy should support the development of a freight centre rather than just the identification of a suitable location.
3. Freight centres should be located around the edge of the city to reduce the number of HGVs travelling into the city centre.
4. A freight consolidation centre will mean higher costs to the consumer.
5. Explore whether there is potential to develop trans-shipment sites around York, to reduce congestion associated with HGVs.

### **Public Transport**

1. Opportunities to enhance and improve public transport links need to be investigated particularly in the east of the city, linked to new residential and employment allocations.
2. Good provision of public transport is an issue that should be considered if we need to find land outside the main built up areas of York for employment and housing.
3. The river is a lost opportunity which could be used as a transport link. Park and sail could be used and could be integrated with the rest of the transport system.

4. The approach should consider introducing a river ferry (shuttle service) between Museum Gardens and Castle area/Tower Place.
5. Accessible, reliable public transport with local and city-wide connections is a priority when creating inclusive communities.

### **Buses**

1. There is a need for a more strategic, coordinated approach to bus services with a single ticket system that works across all bus companies.
2. There is no consistency in bus services across the city, there should be access for the whole community to ensure accessibility for all.
3. Future growth at Moor Lane would contribute to better use of Park & Ride buses during day.
4. Support for the Park & Ride initiative at the A59 and enlargement of A59/A1237 roundabout will help achieve wider sustainable transport objectives and improve accessibility of York Northwest.

### **Rail/Tram-Train**

1. As a large number of people commute to Leeds the LDF should explore creating new communities by Copmanthorpe to make use of existing rail lines.
2. The approach should test the viability of rail options against dedicated bus routes.
3. The LDF should consider relocating intercity rail links to South of York in a parkway form.
4. The re-opening of the Beverley to York rail line should continue to be included as a firm policy approach is developed and the route should be safeguarded through the Allocations DPD.
5. Concern about the economic viability of reinstating the Beverley to York rail line.
6. Greater emphasis should be placed on redeveloping rail links to West and South Yorkshire, South Leeds and York itself using existing lines and facilities.
7. Cuts in public spending are likely to undermine prospects for the Tram-Train initiative. It does not yet have Network Rail support and no funding has been identified.
8. The section should show the rail proposals as part of the wider network including the Harrogate Line and links to Leeds/Bradford Airport.
9. Support for the development of Haxby rail station and tram-train to access YNW.

### **Walking and Cycling**

1. As a cycling city York should put in place a rented bike scheme.
2. To encourage modal shift from the car businesses should be encouraged to provide secure cycle parking.
3. The footstreets should be extended to routes leading through city bars e.g. Bootham and Micklegate. This would improve people's appreciation and enjoyment of historic city (English Heritage).
4. The approach should consider allowing cycle access to the footstreets. As a minimum the strategy should create one cross city cycle route with 24/7 access.

5. Car parking areas should be reduced to provide for secure cycle storage.
6. To encourage cycling there is a need for a more integrated cycle network incorporated into every road not just selected routes.
7. The strategy should consider linking villages to York by cycle routes. This would not only benefit small rural populations but would provide leisure routes for York residents to access the countryside.

### **P a r k i n g**

1. Provide 'accessible' car parking spaces, rather than 'disabled' parking spaces.
2. Car parking within the city centre is too costly which stifles business.
3. Remove car parking areas which have an adverse impact upon character of City such as Nunnery Lane and St George's Field (English Heritage).
4. Reduce the number of car parking spaces in direct proportion to the development of new Park & Ride sites and the introduction of bus priority measures.
5. Where new retail development is proposed, including at York Central, sufficient new parking should be permitted to protect and maintain the vitality of that retail development.
6. Parking should be part of clear strategy for traffic reduction and the enhancement of environment for walking and cycling.

### **S h a r e d S p a c e s**

1. Further thought should be given to shared pavements and cycleways, using the same path causes problems for the mobility impaired, the elderly and those with visual impairments. The success of shared spaces is dependent on eye-contact between users, which is not possible for those with visual impairments. It would be preferable to differentiate between cycling and walking routes.
2. The approach needs to be consistent as there is confusion over which paths cyclists can use and those which they are prohibited from using.

### **T o u r i s m**

1. Sustainable transport across the city is a critical issue for tourism. Inconsistent public transport provision adversely affects accommodation providers and attractions outside the city centre.
2. The Core Strategy aims to increase retail market share and visitor income which will depend significantly on attracting visitors to York, many of whom will travel by car. This conflicts with the stated aim of reducing the number of car journeys.

### **C u r r e n t D e v e l o p m e n t s a n d P r o p o s e d M a j o r D e v e l o p m e n t S i t e s**

1. How will employees get to YNW given that most commuters are from the east and south of the city?
2. More consideration needs to be given to whether transport that ensues from proposed developments can be accommodated on the network.
3. Clifton Moor has significant transport issues that need to be addressed
4. Area C would encourage outward movement of people living in the city centre to work on the south east side whereas much of the people in that

area are currently forced to travel toward the city for employment. This rebalance could ease congestion issues. Area C is located on an important junction and is in a sustainable location.

5. In order for Area I to be sustainable and to unlock the potential of the Northminster Business Park the ring road would have to be a dual carriageway otherwise the congestion issues would make it unviable. If the transport implications of Site I were solved it would just move the transport problems elsewhere.
6. Area D should be considered in light of the proposed relocation of the Park & Ride and tram-train routes.
7. Congestion in Fulford is detrimental to its historic character and environment. Major developments are proposed along A19 without sufficiently considering whether such traffic can be accommodated.

## 20. Green Infrastructure

### Planning York's Future Questionnaire

**Question 18:**

**York's parks, open spaces, nature conservation sites, river corridors are part of the City's green infrastructure. We intend to protect and improve these existing green assets whilst also addressing "gaps" in provision. Do you agree with this approach? Please answer Yes or No.**

**Which parks and open spaces do you think need to be improved and where do you think new ones are needed?**

- Almost all respondents (99%) who completed the survey agree with the approach to green infrastructure, which intends to protect current infrastructure whilst looking at any 'gaps' in provision.
- Respondents were given the opportunity to suggest parks and open spaces that need improving and areas for new ones. 67% of the sample did not provide any suggestions, of those that did the main ideas were:
  - Improve Rowntree Park, mainly by removing the geese.
  - Improve the riverside or create more riverside paths.
  - Improve Museum Gardens.
  - Improve Acomb Green.
  - Improve West Bank Park.
  - Need a park at Castle Museum/Cliffords Tower area.
  - Need more parks and open spaces in the Huntington area.

### Core Strategy Preferred Options Document

**Question 14:**

Please tell us what you think of the council's preferred approach to green infrastructure. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think that the multifunctional benefits of green infrastructure are adequately reflected in this section and will the policy ensure the creation, protection and maintenance of nature conservation sites, recreational open space and green corridors?
- b) We intend to protect and improve existing green assets whilst addressing 'gaps' in provision. Do you agree with this approach?
- c) Which parks, open spaces and other green assets do you think need to be improved and where do you think new ones are needed?

### **Policy Approach**

1. The Green Infrastructure (GI) policy needs to be more detailed for development control purposes.
2. GI covers the whole city, therefore the wording of the policy is more important than lines on a map.
3. The policy approach should focus on contributions to GI.
4. The approach should be more flexible to allow for site specific investigations/ considerations.
5. The policy should make clear that mitigation is the last resort; protection of established GI should be the priority.
6. A policy should be implemented to stop people laying tarmac on their front gardens and sub-dividing their back gardens both of which impact negatively on GI.
7. The approach should give more direction about where new open space/green corridors will be located with links to proposed housing and other growth.
8. The GI benefits should not just be broken down into three areas. It should include additional targets beyond 'nature conservation', open space' and 'green corridors'.

### **General Comments**

1. The section should be closely linked to the spatial strategy and green belt sections.
2. Reference should be made to quality of place and the historic environment, linking the natural and built environment together and integrating GI into the built fabric.
3. Support the production of a GI Strategy SPD
4. Would expect valuable existing GI to be identified and safeguarded in the Core Strategy by steering development away from these areas or at least ensuring that when it does take place, it is designed sympathetically to allow its multifunctionality to be retained and enhanced (Environment Agency).
5. GI assets should not be designated in the Allocations DPD.
6. Concern that the GI definition is not consistent with the RSS.
7. Excessive growth will have a negative impact on wildlife and biodiversity due to the increased levels of traffic, air pollution, disturbance and loss of open space. Laudable policies on green corridors and enhancing biodiversity may be difficult to implement if growth is too great.

### **Scale of Green Infrastructure**

1. The approach should recognise more local areas of GI.

### **Role/Benefits of Green Infrastructure**

1. The strategy should place additional emphasis on the wider role of GI including the economic and social benefits (Yorkshire Forward).
2. Reference should be made to agricultural and non-agricultural food production as a benefit of GI.
3. GI has a positive impact on climate change. It is important in relation to urban cooling, flooding, SUDS and urban heat island effect.
4. GI can have a dual use, providing several environmental benefits including reduced risk of flooding (flood storage areas and green roofs) (Environment Agency).
5. Trees and woodland can absorb pollution and act as an acoustic barrier to noise from main roads.
6. An attractive public realm including a good natural and built environment provides a good backdrop for investment and tourism.

### **Types of Green Infrastructure**

1. There should be further reference to the inclusion of trees and other green spaces in development.
2. Support for specific reference to ancient woodland, aged and veteran trees and increase in woodland cover (The Woodland Trust).
3. Support tree planting which must be done in the right locations and using the right species.
4. Allotments are an important part of GI as they bring environmental and social community benefits.
5. A range of GI assets need attention including outdoor sports facilities, cricket pitches, extra planting, increasing the number of re-seeded areas, restoring areas lost to intensive agriculture and preservation of ancient grassland.
6. Park & Ride sites should be landscaped to create country parks.
7. There is a need for play equipment in the city centre such as in Museum Gardens.
8. There should be more emphasis on the rural environment.
9. The approach should give weight to important views across the city (GOYH).

### **Green Infrastructure Standards**

1. Support for ANGSt standards although the approach should recognise that green space is important for a number of reasons, not just as a measure of direct usefulness to human beings.
2. The strategy needs to exercise caution when using the ANGSt standards as these are difficult/impossible to achieve.
3. The policy should include a specific measure for retention of school playing fields.
4. The approach should include a specific target like the Woodland Trust's Access to Woodland Standard instead of the vague commitment to increased access to natural greenspace.



### **Biodiversity**

1. The Biodiversity Audit and Action Plan are critical and should be completed ahead of the Core Strategy going forward.
2. Welcome the commitment to developing a city wide network of wildlife sites. The approach should also refer to buffering and extending habitats (The Woodland Trust).
3. The ring road is an area of high biodiversity, the council should consider planting with wildflower seeds like in Lincoln.

### **Open Space**

1. The approach to addressing open space deficiencies through new development is questioned. Contributions should meet all tests in Circular 05/2005.
2. The policy should include a commitment to protecting open spaces and refer to the potential harm which might be caused to an area through the loss of open space.
3. The general public need to be made more aware of the public open spaces near them.
4. Open spaces should be located throughout the community
5. Open space in areas of terraced housing and flats should be valued due to the lack of private gardens.

### **Green Infrastructure Corridors**

1. The importance of all green space should be recognised, not just prioritising green corridors.
2. Further work looking at specific wards in relation to the GI corridor work is needed and additional sites should be added to the GI map.
3. Questioned whether green spaces need to be linked together to be a network.
4. How are sites that do not have public access managed?
5. The approach should recognise that green road corridors contribute to the setting of York e.g. views from the A64, A59 and ring road.
6. Improving biodiversity on verges of footpaths and cycle paths will help to connect York residents with natural environment and create wildlife corridors.
7. Corridors should be correctly labelled e.g. cannot have 'regional corridors' as these are not identified in RSS, should call them strategic (GOYH).

### **Site Specific**

1. The City Centre needs more green spaces.
2. The Castle car park should be allocated as green space.
3. The proposed new bus lanes along the A19, Fulford Road, and Tadcaster Road will be detrimental to green corridors. Do traffic and highways infrastructure issues outweigh GI?
4. The approach should look at green linkages between industrial sites.
5. The loss of potential public open space to development must be resisted ('recreational opportunity area' now being developed for a Park & Ride).

### **Delivery of Green Infrastructure**

1. Concern over who will fund GI, are developers expected to fund it on top of other contribution requirements?
2. An SPD may not be the best vehicle for a GI policy as it cannot make designations.
3. The maintenance of GI has financial implications, the strategy should identify how this will be funded.
4. GI should be included within the Infrastructure Delivery Plan.
5. Management and Action Plans are important to ensure that areas are maintained correctly e.g. mowing regimes.
6. All new housing developments should incorporate GI, achieved through requiring major developments to be accompanied by a site based GI strategy (Natural England).

### **Inclusive Green Infrastructure**

1. Green space for everyone, including the elderly and disabled, should be identified as a priority in creating inclusive communities.
2. Safety is important, many green spaces can feel unsafe and intimidating.

## **21. Resource Efficiency**

### **Planning York's Future Questionnaire**

#### **Question 16:**

**A key role of the plan (LDF) is to promote sustainable development, this includes addressing the issues of climate change. Which of the methods below, do you think will be most effective in York?**

- a) By promoting renewable energy on site (e.g. solar panels)**
- b) By promoting renewable energy off site (e.g. wind turbines)**
- c) Promoting sustainable design and construction techniques**
- d) Providing alternative means to landfill to dispose of waste**
- e) Ensuring that new development does not add to the flooding and drainage problems in York**
- f) Encourage low emission transport systems**
- g) Other \_\_\_\_\_**

- Two-thirds (67%) of the sample agree with promoting sustainable design and construction techniques, whilst 64% agree with promoting renewable energy on site.

- Respondents were least likely to agree that promoting renewable energy off site will be most effective for York (33%).

- 'Other' suggestions included:

Encourage additional methods of renewable energy.

## Core Strategy Preferred Options Document

### Question 15:

Please tell us what you think of the council's preferred approach to resource efficiency. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think that the sustainable design and construction, energy efficiency, and renewable energy methods highlighted in this section will help to reduce York's eco and carbon footprints, thereby reducing overall energy use in line with the Energy Hierarchy and help in the fight against climate change?
- b) Do you think that the council should undertake further work to identify suitable York-based thresholds (beyond those set out in RSS) for renewable energy generation and to identify general locations suitable for CHP generation and other appropriate renewable energy methods?

### Objectives and Targets

1. The objectives would be strengthened if they were framed more positively by removing words 'seek to' (Yorkshire Forward)
2. The approach should focus more on the need to reduce all types of emissions and incorporate likely requirements of forthcoming Low Emission Strategy.
3. There should be more detailed projections on what impact the measures will have on reducing York's eco and carbon footprints. A similar exercise should be applied to other sections of the Core Strategy.

### Policy Approach

1. The Core Strategy should include a locally distinctive policy that could also signpost policies for a low-carbon community at YNW (GOYH).
2. An outline of different renewable energy generation technologies should be presented to encourage and promote all forms of renewable energy.
3. The approach should refer to the need to reduce consumption across the board as part of a policy to minimise resource use, transport and waste generation.
4. The policy focuses too much on reducing the carbon footprint of new buildings through energy efficiency. There should be more emphasis on the production of renewable energy to assist in reaching targets.
5. Coal Bed Methane (CBM) is a recognised alternative source of energy production which should be reflected in a specific policy, or as an insert into this policy.

### Sustainable Construction and Design

1. The approach should not duplicate codes and guidance enforced through building regulations.
2. 'Innovative construction techniques' should only be applicable where appropriate and viable to do so.
3. Reference to 'high standards' should be expanded and defined in the Core Strategy, as well as in an SPD to provide clarity.
4. The policy should comply with the Code for Sustainable Homes and BREEAM standards.

### **10% Renewable Energy Target**

1. Challenging requirements for renewables could affect the ability of sites to deliver other contributions like affordable housing.
2. The policy should have an evidence-based understanding of local feasibility and potential for renewable and low-carbon technologies. Without a clear evidence base there is no justification for a policy which requires the RSS target to be exceeded.
3. The thresholds and targets set out in RSS Policy ENV5 are only interim measures and there is an expectation that local authorities will develop their own thresholds and targets (Yorkshire Forward and GOYH).
4. How any target is achieved should be decided on a scheme by scheme basis.
5. It is crucial that a robust mechanism for verifying the actual energy performance of developments once built is put in place.

### **On and Off Site Provision**

1. The policy should define in more detail the criteria that will be used to determine whether on or off site provision is appropriate.

### **Stand Alone Sites**

1. Sites for stand alone renewables should be given priority unless serious detriment to the historic character and setting of York is proved.
2. The North Selby site has the potential for 'stand alone' renewable energy production and will make a significant contribution the development of bio-renewable technologies.
3. The ability of the Harewood Whin site to accommodate renewable energy technology without an adverse impact upon the special character and setting of the city should be recognised
4. Biomass and energy from waste facilities should be steered towards locations where an end-use for both electricity and heat is guaranteed. New developments should be designed so they can (now, or in the future) be connected into community heating schemes (Environment Agency).
5. In accordance with PPS22 local landscape and nature conservation designations should not be used to refuse permission for renewable energy developments other than in most exceptional circumstances.
6. There should be a robust criteria based policy to assess all applications for renewable energy developments and to identify potential sites.

### **Tackling Climate Change**

1. The policy should include firm details on how climate change will be tackled, referring to the legally binding targets in the Climate Change Act.
2. The strategy should include an overarching climate change policy to deliver greater production of renewable energy and increased levels of energy efficiency.

### **Combined Heat and Power**

1. How will CHP have a significant impact on reducing the carbon footprint since it relies on combustion of fuel to generate electricity?
2. CHP should not be a preferred technology.

3. CHP is not appropriate for new housing if housing is built to appropriate energy efficiency standards
4. The policy should cover residential development as well as commercial.
5. Support for testing the feasibility of CHP in commercial premises.
6. The potential for an Energy Services Company and site-wide CHP should be considered for inclusion in the policy.

### **Wind Turbines**

1. Wind turbines should not be subject to the flood risk Sequential or Exception Test provided they are designed to be water-compatible, will remain operational during an extreme flood and will not increase flood risk elsewhere.
2. Wind farm development should be specifically mentioned in the Core Strategy because the RSS has established a capacity for wind farms.
3. A constraints mapping approach should be adopted to find an appropriate wind farm site, which could be identified in the Allocations DPD. There is a potential site west of Copmanthorpe near to Hagg Wood.

### **Undertaking further work to identify York Specific Target and Potential Sites**

1. It is not necessary to undertake further work. The RSS thresholds for renewable energy generation are sufficient.
2. The approach should not make assumptions about the technical and commercial feasibility of renewable energy projects. Technological change can mean that sites currently excluded as locations for particular types of renewable energy development, may be suitable in the future.

### **Other**

1. Waste should be included as a resource given that it can be a valuable feedstock to industry if it is adequately separated and processed.
2. The level of information requested from applicants should be proportionate to scale of development proposed, its likely impact on and vulnerability to climate change, and that needed to demonstrate conformity with policy.
3. Specific and standalone assessments of new development should not be required where requisite information can be made available through other submitted documents e.g. as part of a Design and Access Statement, or Environmental Impact Assessment.
4. The strategy should refer to and utilise, unique opportunities provided by University's world-class standing in this area and its leading role in the Yorkshire Centre for Low Carbon Futures and Biorefinery Initiative (University of York).
5. There is a need to consider making older homes more energy efficient.
6. The approach should consider how resources will impact on emissions and air quality.

## 22. Flood Risk

### Planning York's Future Questionnaire

**Question 16:**

A key role of the plan (LDF) is to promote sustainable development, this includes addressing the issues of climate change. Which of the methods below, do you think will be most effective in York?

- a) By promoting renewable energy on site (e.g. solar panels)
- b) By promoting renewable energy off site (e.g. wind turbines)
- c) Promoting sustainable design and construction techniques
- d) Providing alternative means to landfill to dispose of waste
- e) Ensuring that new development does not add to the flooding and drainage problems in York
- f) Encourage low emission transport systems
- g) Other \_\_\_\_\_

- Over four-fifths (85%) of respondents think that ensuring new development does not add to the flooding and drainage problems in York will be most effective for sustainable development.

### Core Strategy Preferred Options Document

**Question 16:**

Please tell us what you think of the Council's preferred approach to flood risk. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think that the policy will ensure that new development is not subject to, or contributes to inappropriate levels of flood risk from the River Ouse, Foss and Derwent?
- b) Do you think that the 30% target for the reduction of run-off rates is achievable on all Brownfield sites? If not, please submit alternative evidence to support any proposed revised target.

### Policy and General Approach

1. The importance of ensuring Exception Tests are rigorous and complete in all respects cannot be understated (Yorkshire Forward).
2. The chapter should recognise flooding from other sources such as pluvial flooding (Yorkshire Water).
3. Commercial pressure for inappropriate developments in the flood plain will need to be resisted.
4. Appropriate spatial planning and more sustainable land management and use can help to reduce the likelihood of flooding, thereby making a critical contribution to flood erosion risk management (Natural England).

5. Support for the objective to ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk, with the highest risk flood zones identified for minimising flood risk being appropriate.
6. Other issues identified but not considered within the chapter included: do not build new homes on the flood plain areas, ensure that areas have good drainage or proper water runoff areas, dredge the rivers or becks regularly and ensure that flood protection measures are in place.
7. The chapter should focus on the positive aspects of the constraints identified through the spatial strategy.

### **Sequential Test and Exception Test**

1. An overriding approach based on the precautionary principle would be welcomed.
2. It should be made clear within the policy that water compatible and less vulnerable uses maybe permitted within Flood Zone 3a without the need to comply with the Exception Test, however compliance with the Exception Test will be necessary if essential infrastructure or more vulnerable uses are proposed within Flood Zone 3(a).
3. There is a need to ensure delivery of brownfield opportunities within Flood Zone 3 to meet development needs over the LDF plan period. The spatial strategy prioritises brownfield land and therefore assumes that the PPS25 Exception Test will be passed. The policy should state that account will be taken of the PPS25 Sequential and Exception Tests when identifying sites for development.
4. To further assist in the consistent and thorough application of the Sequential and Exception Tests, local guidance tailored to York should be developed. The SFRA guidance should be expanded to include a York specific definition of 'reasonably available sites', the geographical area to which searches will be applied and how windfall sites will be dealt with (Environment Agency).

### **Run-off Rates Target**

1. Support the target of reducing existing runoff rates by at least 30%. Take caution over unacceptable pollution risk which may occur on contaminated sites if implementing sustainable drainage systems such as soakaways and other infiltration devices (Environment Agency).
2. Mixed views over the target for runoff rates for brownfield development including:
  - a) the target should read: 'at least a 30% reduction in discharge rates for all events up to and including 1:100 years events'.
  - b) the target should be 20%, and be reviewed and increased during the plan period.
  - c) flexibility should be built into the policy to reflect instances where 30% is and is not possible.
  - d) object to the requirement for brownfield developments to demonstrate that there will be a reduction of at least 30% in existing run-off rates as a result of development.
  - e) the Council has not provided evidence that a 30% reduction in run-off rates for brownfield land is achievable.

3. Support for the target of ensuring there is no alteration in run-off rates on all Greenfield developments. It could be strengthened further by a requirement for providing long-term storage (Environment Agency).

### **Sustainable Design and Construction**

1. The production of a Sustainable Design and Construction SPD which addresses issues of flood resilience, resistance and new construction techniques for new developments along with the issue of SUDs adoption is recommended (Environment Agency).
2. SUDS can play a significant role in reducing run-off rates and provide biodiversity benefits.
3. All references to Sustainable Urban Drainage Systems should be amended to Sustainable Drainage Systems to reflect current nomenclature (Environment Agency).

## **23. Sustainable Waste Management**

### **Planning York's Future Questionnaire**

**Question 16:**

**A key role of the plan (LDF) is to promote sustainable development, this includes addressing the issues of climate change. Which of the methods below, do you think will be most effective in York?**

- a) By promoting renewable energy on site (e.g. solar panels)
- b) By promoting renewable energy off site (e.g. wind turbines)
- c) Promoting sustainable design and construction techniques
- d) Providing alternative means to landfill to dispose of waste
- e) Ensuring that new development does not add to the flooding and drainage problems in York
- f) Encourage low emission transport systems
- g) Other

- 59% of respondents agree with providing alternative means to landfill to dispose of waste.
- Other suggestions included:
  - Promote recycling more and make it easier.

### **Core Strategy Preferred Options Document**

**Question 17:**

Please tell us what you think of the Council's preferred approach to sustainable waste management. Please feel free to give any comments you consider appropriate but in particular:



- a) Do you think that the correct approach is being taken in relation to the Waste Hierarchy in terms of promoting waste prevention, minimisation, reuse and recycling?

### **Policy and General Approach**

1. Providing alternative means to landfill to dispose of waste including the promotion of more recycling and the need to make it easier would be an effective way of promoting sustainable development in York and addressing issues of climate change.
2. It should be made clear that waste sites are subject to the rigours of the PPS25 Sequential Test and Exception Test and that allocations will be informed by the SFRA (Environment Agency).
3. Wherever possible waste transfer should avoid the use of the Strategic Road Network (SRN) (Highways Agency).
4. The targets and proposed policy is significantly lacking both in terms of types of waste management facilities required and the differing requirements for different waste streams.
5. The waste strategy pays insufficient attention to commercial and construction and demolition waste, which account for over 90% by weight of all waste in the UK.
6. Core Strategies should include waste strategies and policies unless they are being addressed in other DPD's being prepared jointly with other local authorities or separately by the Unitary Authority. Otherwise there would be a need for a more comprehensive policy required by RSS and PPS10. (Government Office Yorkshire and Humber).

### **Waste Hierarchy**

1. Welcome an approach that fits with the waste hierarchy in PPS10 (Natural England and the Environment Agency).
2. A move to zero waste should be considered.
3. There is a need for a much more detailed strategy for waste prevention and re-use. There is currently no provision for re-use of waste at the council recycling sites. Sites for re-use facilities should be identified.
4. Waste should be considered as a resource for further use.
5. Anaerobic digestion is a safe alternative for food waste and should be considered. This method can also generate energy. The largest Anaerobic digestion plant in the UK is currently being built at the Selby Renewables Energy Park. York's waste food should be diverted to this plant as a priority.
6. The range of dry recyclables collected by the council is extremely limited when compared to other Local Authorities and joined up thinking is required by the council.
7. An alternative to landfill for residual waste is Energy from Waste (EfW). Object to identifying a site for waste incineration. EfW is an inflexible technique for waste disposal which could reduce recycling rates. MBT should be the preferred option as it removes recyclables. Biogas generated by the anaerobic digestion process could be burned cleanly to generate energy.

8. The second target which states 'to reuse, recycle and compost – at least 54.5% of household waste by 2020' should be increased to at least 65% by 2020.
9. Capacity for the treatment of green waste is limited and long-term solutions need to be reached (Environment Agency).
10. Community composting schemes and use of allotment sites for small scale green waste composting maybe appropriate. Clear guidance confirming where such facilities are appropriate would be helpful (Environment Agency). Conversely it was felt that provision for large-scale composting facilities maybe required.
11. The section fails to recognise the continuing role of landfill within the overall strategy. Longer-term requirements for landfill capacity should be explicitly set out within either the targets or the policy.
12. The council provides a limited service for hazardous products and new facilities are required.

### **P F I**

1. The technologies being suggested as part of the PFI need to be thought about carefully, the Council does not want to be burdened with out of date technology which is expensive to run. One of the most efficient ways to treat waste is by separating out different materials e.g. plastics, metals, organic. This could be done through a local incentive, Section 106 agreement or licensing.
2. The LDF needs to reflect the requirement for facilities to recycle waste and bulk and transfer non-recyclable waste once the PFI plant becomes operational.

### **Waste Forecasts**

1. Projected future amounts of total waste maybe over-estimated due to changes in the economy, advances in technology and the public's perception. This will undermine any economic case for typical EfW plants.
2. If the population projections and targets for economic growth and housing provision are accepted, the waste generation forecasts cannot be correct and more facilities will be required.
3. The waste strategy needs to be clearer and more consistent regarding the figures and tables, the figures bear little or no relation to the targets at the end of the section.

### **Site Specific Comments**

1. The Harewood Whin site will continue to play a strategic role in the management of waste in the North Yorkshire sub-region, subsequently the policies in the Core Strategy and the Allocations DPD need to reflect the importance of this site in a waste management context.
2. Site restoration including nature conservation and public access measures required under planning conditions must be implemented at Harewood Whin.
3. If waste is to be transported outside the York boundary the future of Harewood Whin and the Hessay transfer station would be uncertain.

4. There is a need to make sure that there is clear sign up for the cross-boundary delivery of waste management and disposal in the transfer of waste to North Yorkshire, with a fall back position if necessary (GOYH).
5. The PPS1 eco town supplement which refers to a sustainable waste and resources plan for eco-town applications would set higher targets for dealing with waste. The Council should consider the use of locally generated waste as a fuel source for combined heat and power generation as a locally specific element for YNW (GOYH).
6. Harewood Whin was considered suitable for the following uses:
  - a Resources Recovery Centre (RRC);
  - recycle or recover agricultural wastes;
  - a transfer and bulking point for those wastes which could not be recycled on site. This would also reduce the volume of waste traffic on major arterial routes and reduce costs of transport of non-recyclable waste with easy access to the A1 and A64;
  - an integrated facility which would represent the Best Practical Environmental Option, that satisfies the proximity principle and assists the Council in becoming self sufficient in waste management terms;
  - handle the increased volumes of kerbside recycling, and segregation of recyclables waste by householders;
  - construction and demolition waste; and
  - treatment and transfer of hazardous WEEE waste (batteries etc).

#### **Locational Criteria**

1. Support for policies which encourage co-location of waste processing and industries which can use waste as a feedstock as stated in PPS10 (Environment Agency).
2. New waste management facilities will be required in order to meet re-use and recycling targets. Any new sites need to be chosen and developed in ways which will minimise the impact on the environment and human health (Environment Agency).
3. Biodiversity should be considered when choosing appropriate areas for facilities.
4. Any new waste transfer stations will have to be located in areas where they are unlikely to have air quality impacts. They will need to be evaluated for potential issues regarding noise, odour, light and dust.
5. Contamination will be an issue on old waste disposal sites. This should be considered when new development is being considered in the vicinity.

## **24. Minerals**

### **Planning York's Future Questionnaire**

No questions relevant to Section 18: Minerals.
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## **Core Strategy Preferred Options Document**

### **Question 18:**

This section raises a range of key issues. Using the response form provided, please tell us what you think of the Council's preferred approach to minerals. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you agree that known locations which contain mineral resources should be safeguarded from other forms of development that would prejudice future mineral extraction?

### **Policy and General Approach**

1. Support for the principle of reducing the dependency on primary extraction.
2. Avoidance of environmental impacts should be the primary requirement.
3. Transfer of minerals should avoid the Strategic Road Network (SRN) (Highways Agency).

### **Mineral Safeguarding Areas / Mineral Reserves**

1. Mineral Safeguarding Areas should be shown on the Key Diagram (GOYH).
2. There are no coal resources capable of extraction by surface mining methods in York, so there is no need to identify this on the Mineral Safeguarding Areas.
3. Mapping indicates that there are deep coal resources underneath the whole of the York area, providing opportunities for Coal Bed Methane (CBM). The importance of CBM should be recognised within the Core Strategy.
4. Identify the extent of mineral reserves and list principal constraints to any proposed production.
5. There can be no justification for minerals extraction in the Minerals Area of Search currently designated in York.
6. Mineral sites need to be subject to the rigours of the PPS25 Sequential Test. All allocations should be informed by the SFRA (Environment Agency).

### **Demand/Need**

1. An estimate of the likely level of demand for minerals will need to form part of the equation.
2. Sites should only be approved to meet local/regional needs, not for transporting minerals further afield.
3. Concern over meeting the RSS sand and gravel and brick clay requirements as these are predicated on excessive levels of economic growth.

### **Supplementary Documents**

1. Support for the 2<sup>nd</sup> target which states that 'All developments to demonstrate good practice in the use, re-use and recycling and disposal of

construction materials'. This should be detailed as part of a Sustainable Building SPD.

2. There is a requirement to identify and provide a framework for safeguarding quarries (both active and disused) which are considered to have potential to provide material for the repair of historic buildings and structures within the area (English Heritage).

## 25. Delivering New Infrastructure

### Planning York's Future Questionnaire

No questions relevant to Section 19: Delivering New Infrastructure.

### Core Strategy Preferred Options Document

#### Question 19:

Please tell us what you think of the council's preferred approach to delivery and review. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you have any views on what would be an appropriate mechanism for funding infrastructure? Should the Council use one, or a combination, of the following:
  - Planning obligations;
  - Standard charges;
  - A standard tariff system; or
  - A Community Infrastructure Levy (if introduced by national policy)
- b) Are there any other approaches which you think we should consider?

#### General and Policy Approach

1. The overall approach to infrastructure needs firming up before publication (GOYH).
2. The policy should be strengthened to outline the importance of appropriate infrastructure being in place to support new development and the proposed levels of growth. Infrastructure capacity should be a key consideration in formulating the spatial strategy.
3. The Core Strategy should be supported by an Infrastructure Delivery Plan (IDP). The IDP should set out the who, what, where, when for infrastructure as required by PPS12. This should be clear for at least the first five years of the plan for critical infrastructure, with evidence that key infrastructure partners are signed up for delivery and taking account of any potential uncertainties and risks to delivery (GOYH).
4. This section should be combined with the Monitoring section to provide a good basis for the delivery plan (GOYH).

### **Developer Contributions**

1. The Core Strategy should have an overarching policy on developer contributions and infrastructure provision, with the detail set out in an SPD. This should be prepared in consultation with developers and test the various mechanisms for typical development scenarios to ensure that they meet circular 05/05.

### **Viability**

1. A flexible approach to contributions should be adopted to ensure that individual developments do not become unviable and so that specific investment projects are not put at risk.
2. The approach to any standard charge or tariff needs to be subject to viability appraisal.

### **List of Contributions**

1. In addition to those identified in the section, the approach should seek contributions for strengthening links between development and learning and skills; land contamination; renewable energy schemes; low emission improvement schemes; and air quality mitigation schemes.
2. Would the policy prioritise certain types of infrastructure?

### **Planning Obligations**

1. The approach should continue to use planning obligations as the best way to collect developer contributions.

### **Tariffs and Standard Charges**

1. Standard charges, tariffs or CIL do not accord with Circular 05/05 and there is no guarantee that these would effectively mitigate the immediate local impacts of a specific development.
2. There are benefits to introducing charges or tariffs, particularly for larger developments, as they would provide clarity and certainty for developers, enabling them to establish land values and delivery on a much clearer basis. It would remove the current unfairness of smaller developments not contributing to infrastructure provision.

### **Community Infrastructure Levy (CIL)**

1. Support the introduction of CIL in York, particularly to help fund green infrastructure (GOYH, Natural England and the Environment Agency).
2. CIL will cause delays or general inertia in delivering infrastructure whilst waiting for funding to become available and it is premature to introduce it during a recession as it will prevent development.
3. CIL may result in developers not bringing land forward until the levy is removed or infrastructure has already been paid for by other developments.
4. CIL is not a suitable method to recover drainage and flood risk contributions. Infrastructure providers are unlikely to fund infrastructure for development if they may not recover full costs for 15-20 years (Yorkshire Water). How would site specific feasibility studies be funded?

5. A combination of mechanisms is required as many infrastructure providers have different investment procedures and different legislation for implementing schemes (Yorkshire Water).
6. CIL would have to be transparent and its relationship to Council budgets made clear; certain developer contributions should be retained to be spent in local areas; payments should be due on completion of development rather than overburdening developers with costs on commencement; revise what contributions are sought for; and CIL charges need to be set out in a DPD and be subject to public examination.
7. The approach should combine CIL with the continued use of planning obligations (Natural England). This would meet concerns about mitigating impacts in the immediate locality of the development (which should be the primary function of contributions) and retain the flexibility to negotiate obligations regarding specific sites.

## 26. Monitoring and Delivery

### Planning York's Future Questionnaire

No questions relevant to Section 20: Monitoring and Delivery.

### Core Strategy Preferred Options Document

No questions relevant to Section 20: Monitoring and Delivery.

#### General

1. This part of the document will need firming up in the period up to publication.
2. The Core Strategy should include a framework for private investment and regeneration that promotes economic, environmental and social well-being for an area. The Framework should be more explicit.
3. The involvement of the business community is vital in understanding the deliverability of sites. The Monitoring and Review Section should promote more working together between policy makers and key stakeholders and stakeholders/delivery partners role should be made clear in each of the key themes for delivery of the Vision.

#### Table

##### *Housing Growth, Distribution, Density, Mix and Type*

1. Object to the target of 60% houses over the plan period, given that the SHLAA and other parts of the Core Strategy state a requirement for 70% houses. It should be reworded to "At least 70% of homes delivered over the plan period will be houses rather than flats."

### **Low Emission Strategy**

1. The concept of a Low Emission Strategy (LES) needs to be incorporated into the strategic objectives and targets (e.g. in Sections 6, 12, 13 & 15).

## **27. Sustainability Appraisal**

### **Planning York's Future Questionnaire**

No specific questions on Sustainability Appraisal.

### **Core Strategy Preferred Options Document**

No specific questions on Sustainability Appraisal.

#### **General**

1. This is a thorough appraisal, which is considered fit for purpose (Natural England).

#### **York Northwest**

1. The remediation of contaminated land is not identified as an issue on YNW sufficiently. Particular reference was made to Groundwater pollution and water pollution arising from surface water run-off.
2. Welcome the techniques outlined to manage water efficiently, generate renewable energy and limit carbon emissions.

#### **Historic Environment**

1. More comprehensive baseline is required as to the environmental capacity of the city and surrounding villages (English Heritage)
2. There is a need for a more comprehensive understanding of the historic environment and its significance to York, including for the economy, to understand the impact of future growth and how it will be delivered without detriment to the historic and natural environment (English Heritage).
3. The SA analysis is flawed in terms of defining "sustainable locations" (English Heritage)
4. Additional retail may damage the vitality and viability of the historic core.

#### **Culture, Leisure and Tourism**

1. Support the SA's recommendation and this should not be dismissed (Natural England).
2. The York cultural and tourist offer could be a key driver for uptake of sustainability principles (Natural England).

#### **Education and Training**

1. Welcome objective EC2 regarding training and building of skills for the population which aligns well with the RES (Yorkshire Forward).



### **Retail**

1. Additional retail could damage the vitality of existing shopping streets and new retail development may damage the vitality and viability of the historic core.
2. Include Newgate Market and additional markets such as the farmers markets, as a more sustainable option for expansion.

### **Sustainable Design and Construction**

1. Good quality and sustainable design will help to enhance cultural/ tourist offer (Natural England).
2. BREEAM and Code for Sustainable Homes should not be included in the Core Strategy and would be more appropriately dealt with through AAP's and master planning of sites, specifically in relation to YNW.
3. Welcome the techniques outlined to manage water efficiently, generate renewable energy and limit carbon emissions.

### **Ecological and Carbon Footprint**

1. Welcome the inclusion of carbon footprinting and advise that the findings should be used to inform future DPDs in the LDF (Natural England).
2. Welcome the objective to reduce the ecological footprint in York which aligns well with the Low Carbon Agenda (Yorkshire Forward).
3. There is potential conflict between the reduction of the carbon / eco footprint and local air quality improvement.

### **Air Quality**

1. There is a need to understand the difference between carbon reduction and air quality as well as the potential conflicts between the two issues. In particular, biomass as a renewable energy source.
2. There is an opportunity to link the idea of an exemplar sustainable community to a low emission community on YNW.
3. The strategy should consider how local air quality improvements relate to vehicle types and fuel choices in the city.
4. The strategy should consider how air quality links to health and the built environment.
5. The development of a Low Emission Strategy should be referenced and supported through the SA.

## **28. Topic Papers**

### **Topic Paper 1**

1. Each of the proposed sites should have been rigorously assessed for their green belt value before they were excluded from draft green belt. This assessment should have included an analysis of views of the Minster from the sites and from the ring road.
2. The quality of landscape is not relevant when allocating land to be removed from green belt.
3. The key policy principles (para 1.10) should include the need to safeguard the special historic character and setting of York (English Heritage).

4. The Topic Paper should include an analysis of the capacity which the environment of each settlement might have to accommodate development (English Heritage).
5. There is no meaningful assessment of the impact that the development of these areas of search might have upon York's historic environment (English Heritage).
6. A tool has been developed specifically to assess the implications of development on the strategic road network. The outputs from this tool should be used to inform the spatial strategy (Highways Agency).
7. The evidence presented is neither robust nor sufficient to justify the identification of development at areas of search A & B and subsequent ranking of development. Much of the commentary is based on assumptions and lacks consistency. In particular the assessment of areas to the west of the city fails to take account of proposed transport improvements like the park and ride and tram train.
8. The approach is not consistent in terms of identifying the outer ring road as a limit to development. The identification of Area of Search I is an acknowledgement that development will be required beyond the ring road.
9. 'Areas retaining rural setting' all lie within the ring road and could therefore be equally applied to all currently undeveloped areas lying between the existing urban edge and the ring road.

### **Topic Paper 3**

1. There is no mention of the use of Travel Plans which are an integral part of the planning process and an essential measure to mitigate the impact of traffic generated by new development (Highways Agency).
2. The paper does not explain the assessment of alternative areas of growth outlined in Topic Paper 1 and how the findings have informed the selection of Monks Cross and Metcalfe lane as preferred urban extensions in transport terms.
3. The model does not include the upgrades to all seven roundabouts along A1237 Ring Road, which distorts the picture of where capacity exists. This is why locations have been selected away from areas along this route i.e. east of the city.
4. Other than the table at para 6.5 little is presented that gives a clear indication of trip distribution around the city.
5. There is confusion that in observing a general westerly flow of traffic across the city the Council view an eastern extension as a sensible solution to the city's growth pressures.
6. York has an important relationship with Leeds and the rest of the City Region for living and working, yet conclusions reached in this topic paper view this to be a negative issue.
7. A new modelling exercise should be undertaken which truly represents existing patterns, proposed highway improvement schemes and new/projected patterns as a result of any one of nine areas of search or a combination of these being developed. Without this evidence there is a risk that relevant policies in Core Strategy could be found unsound.
8. The Moor Lane Site considered to be equally as sustainable as either preferred areas of search for access by sustainable modes. It would not

result in any greater impact on the ring road than preferred sites, it is not predicted to experience any significant capacity issues, it would not require greater levels of mitigation on surrounding network and is has similar or better level of public transport accessibility.

## Further Consultation Following Preferred Options Consultation

### 29. Targeted Retail Consultation

- 29.1 At the LDF Working Group (LDFWG) on 25 October 2010 Members discussed a report on the proposed approach to retail for the Core Strategy Submission. The purpose of the report was to inform Members how the detailed evidence base has shaped the recommended policy approach to be taken forward in the Core Strategy.
- 29.2 At the meeting Members asked that a targeted consultation exercise was undertaken with relevant stakeholders to fully inform them of the evidence base work and the draft Core Strategy retail policy approach and to give them an additional chance to make comments to be reported back to Members at a further LDFWG.
- 29.3 A letter detailing the process to date and the headline messages from the evidence base work along with a link to the full LDFWG report and technical appendices and a copy of the proposed policy approach was emailed where appropriate or a hard copy sent out to the following groups of people at the beginning of December 2010 with a deadline for responses of January 10 2011:
- York Chamber of Trade
  - York Property Forum
  - York Civic Trust
  - York Business Forum
  - York Environment Forum
  - York Open Planning Forum
  - English Heritage
  - Without Walls York Economic Partnership
  - York Retail Forum
  - Visit York Board
  - York Chamber of Commerce

#### **Consultation Response**

- 29.4 Responses were received from the following consultees:
- York Chamber of Trade
  - York Environment Forum
  - English Heritage

- Without Walls York Economic Partnership
- Visit York Board

29.5 A summary of their comments is set out below.

### **York Chamber of Trade**

1. Concerns about new large retail developments on the edge and outside of York City Centre particularly as these types of developments have free and easy car parking/car access whereas the businesses in York City Centre are constrained in both accessibility by car and the heavy car parking charges.
2. York's main shopping streets are showing great improvements and resilience to the current recession with some new brands moving into the City Centre – Coast, White Stuff, The White Company, Cath Kidston, Whistles and new shops to open soon such as Joules and Jo Malone. However York City Centre still remains vulnerable to competition from large new competing out of centre retail destinations which are more accessible by car.
3. The City Centre cannot survive on tourist business alone, it needs to continue to be attractive to York Residents and those living within the immediate hinterland.
4. The pedestrian zone should be enhanced and supported by good accessible, additional and attractively priced car parking. Price should be able to compete with out of centre car parking, should be the same for York residents and non-residents and pay should be on exit to make it more convenient to shoppers.
5. York's historic and unique City Centre should remain the primary focus and its viability should not be undermined by other out of centre and edge of centre proposals.
6. Any new retail space on the edge of the City Centre should be closely knit to the existing pedestrian zone and not extended in a linear fashion.
7. Oppose the extension of the retail area beyond the top of Piccadilly in a linear fashion on the basis that such linear development would undermine the distinction and dilute the vitality of the heart of the City Centre.

### **Visit York**

1. Retailing is one of the strengths of the City and helps to attract 7 million visitors a year, 50% of leisure visitors do some shopping as part of their visit and the estimated spend by visitors (£50.8m in 2008) is the 2<sup>nd</sup> highest area of spend after food and drink.
2. The proximity of the shopping offer with the world class attractions and high quality food and drink establishments creates an excellent shopping environment for residents and visitors which should be safeguarded.
3. May need to consider greater flexibility regarding the suggested phasing of retail development that is outlined which take account of market demands however, Visit York do support the priorities as being reasonable.
4. Support for prioritising Castle Piccadilly but should acknowledge the sensitivity of the site, the need to avoid potential over development and

should acknowledge that a mix of uses with retail, restaurant, café and public space would be appropriate and in keeping with the current retail offer works in the City Centre.

5. York Central – retailing needs to complement the shopping offer in the existing centre and not draw customers away. The longstanding issues of connectivity between York Central and the rest of the City need to be addresses and Visit York supports proposals for better access to and from the north side of the Ouse and the Station/York Central.
6. In the current economic climate out of centre retailing does create substantial job numbers and it is an important draw to visitors in its own right. Out of town retailing does complement the city centre offer but it is essential that they are serviced by strong transport links to encourage connectivity with the rest of the City Centre.

### **York Economic Partnership**

1. Support Phase 1 of the policy approach (City Centre) but the term ‘Stonebow area’ is too imprecise. If Hungate area is included then it should be more specific. The Partnership would support the inclusion of Hungate.
2. Do not support Phase 2 (York Central). York Central should not be considered as suitable for comparison shopping as it will create a dual centre to the detriment of the City Centre retail offer and could also dilute tourism by pulling some tourist expenditure to the York Central area only.
3. The predicted impact on the City Centre of the York Central floorspace may be higher than 7%. This is speculative and would depend on what type of retailers were attracted to York Central and Castle Piccadilly.
4. The York Central site could not ever be fully integrated into the City Centre and therefore it will promote a two centre proposition which will compete directly and would be unhealthy for the current city centre.
5. Support the inclusion of convenience/neighbourhood shopping at York Central.

### **York Environment Forum**

1. In response to the ‘need for additional floorspace to absorb the available expenditure’ the forum believes that the ‘need’ of a developer to maximise profit does not necessarily equate to a ‘need’ expressed by residents and visitors. This can lead to unacceptable environmental and social consequences. The forum welcomes the acknowledgement in the Retail Topic Paper that ‘capacity alone does not allow unrestricted growth across the city’ and that other significant factors must be taken into account.
2. The forum welcomes the recommendation in the LDFWG report (25/10/10) that the Core Strategy retail policies should no longer include an objective to increase York’s Market share to a set target of 34% and should instead be based on a policy approach to maintain York City Centre’s vitality and viability and to provide for local need.
3. The forum welcomes the policies on growth in the City Centre but is concerned over the proposal to introduce space for larger modern floorplates with the only caveat being that ‘ new development should be of an appropriate scale and design to complement the existing city

- centre'. This is subjective and the words 'consistent with its status as a major conservation area' should be added.
4. The forum welcomes the inclusion of Stonebow House and the Telephone Exchange as sequentially preferable sites but is concerned about the allocation of Castle Piccadilly (24,000 sq m net). This is comparable to the Land Securities scheme which was refused. The forum does not believe such a development would satisfy the environmental requirements of such a sensitive site. Would be conflict with the Alan Simpson Study where the site is designated as a 'civic park' under the City as a Park programme.
  5. The forum would support a redevelopment confined to the Piccadilly side of the River Foss with a limited extension to the Fenwick store.
  6. The Castle Piccadilly Planning Brief is out of date and should be re-evaluated
  7. The Forum would not support the development of further retail floorspace at Monks Cross as part of the Community Stadium.
  8. The forum welcomes the cautious approach to the York Central development (20-25,000 sq m net) post 2020.
  9. The forum broadly support the Core Strategy approach to retail and in particular the move to modify the York Central targets and subject them to a further detailed retail impact assessment. The forum has reservations over some of the Central Shopping Area policies and the failure to align them with the Alan Simpson work.

## Abbreviations

**AAP:** Area Action Plan

**ANGSt Standard:** Accessible Natural Green Space Standard

**AQMA:** Air Quality Management Areas

**B1(a):** Offices

**B1(b):** Research and Development

**B1(c):** Light Industry

**B2:** General Industrial

**B8:** Storage and Distribution

**BREEAM:** Building Research Establishment Environmental Assessment Method

**CABE:** The Commission for Architecture and the Built Environment

**CBM:** Coal Bed Methane

**CHP:** Combined Heat and Power

**CIL:** Community Infrastructure Levy

**CYC:** City of York Council

**DPD:** Development Plan Document

**EfW:** Energy from Waste

**GI:** Green Infrastructure

**GOYH:** Government Office for Yorkshire and Humber

**IDP:** Infrastructure Delivery Plan

**IRS:** Integrated Regional Strategy

**LCR:** Leeds City Region

**LDF:** Local Development Framework

**LES:** Low Emissions Strategy

**LGYH:** Local Government Yorkshire and Humber

**LTP2:** Second Local Transport Plan

**MBT:** Mechanical Biological Treatment

**PFI:** Private Finance Initiative

**PPG2:** Planning Policy Guidance 2 (Green Belts)

**PPS1:** Planning Policy Statement 1 (Delivering Sustainable Development)

**PPS3:** Planning Policy Statement 3 (Housing)

**PPS6:** Planning Policy Statement 6 (Planning for Town Centres)

**PPS10:** Planning Policy Statement 10 (Planning for Sustainable Waste Management)

**PPS22:** Planning Policy Statement 22 (Renewable Energy)

**PPS25:** Planning Policy Statement 25 (Development and Flood Risk)

**R&D:** Research and Development

**RES:** Regional Economic Strategy

**RSS:** Regional Spatial Strategy

**SA:** Sustainability Appraisal

**SFRA:** Strategic Flood Risk Assessment

**SHLAA:** Strategic Housing Land Availability Assessment

**SHMA:** Strategic Housing Market Assessment

**SPD:** Supplementary Planning Document

**SRN:** Strategic Road Network

**SUDS:** Sustainable Drainage Systems

**WEEE:** Waste Electrical and Electronic Equipment

**YNW:** York Northwest