
Executive

18th December 2007

Report of the Director of City Strategy

City of York Council response to the Secretary of State on the Proposed Changes to the Regional Spatial Strategy

Summary

1. This Report outlines the Council's proposed response to the Secretary of State's Proposed Changes to Draft Revised Regional Spatial Strategy (RSS). Annex B provides the Council's responses in chapter order. These have been drafted involving relevant officers from across the authority. Responses are required to be submitted to the Secretary of State by 21st December. This Report:
 - Summarises the key issues regarding the Proposed Changes to the Draft RSS;
 - Sets out a proposed response to the changes and seeks endorsement of these views.

Background

2. In December 2005 the Draft RSS went out for public consultation. This was followed by an Examination in Public (EIP) during 2006. The independent Panel published their Report in May 2007 which was considered by the Secretary of State in proposing changes to the draft plan. The Secretary of State's Proposed Changes were published in September 2007 and consultation is now taking place on these until 21st December 2007.
3. All comments will be made available for the public to read, therefore they cannot be treated as confidential. This is the last opportunity to make comments on the RSS before the final RSS is published. All comments received by the Government Office will be taken into account before the Plan is finalised and published, currently expected to be in Spring 2008. Comments can only be made on the Proposed Changes and not on those other elements of the Plan that remain unchanged since the Draft Plan was published.

Consultation

4. The Regional Assembly consulted widely in preparing the Draft RSS and at the Examination in Public key issues were debated by a wide range of different interested parties across the region. The Proposed Changes have also been subject to wide ranging consultation. Copies of the document and background papers referred to at the end of this report have been placed at Reception and in libraries and also in the Members library. The proposed responses set out in Annex B of this report have been drafted with the relevant officers from across the authority.

Options

5. Options open to the Executive are either to accept, reject or amend any of the comments attached as Annex B.

Analysis

6. The Council has actively engaged in RSS preparation over the last two years to ensure that the City's priorities and issues are properly reflected in the final document. At the Issues and Options Stage of RSS (January / February 2005 – 2 batches) Executive agreed some 'key messages' for York that were important to address in the RSS as it was being developed. These are set out in Annex A for members information.
7. Officers believe that the development of the RSS to date has in general addressed these issues and the Proposed Changes do not undermine the Core Approach set out in Draft RSS, which we support. However, there are some key issues where the plan will need to be changed. Our full proposed responses to the Proposed Changes are set in Annex B. The remainder of this report draws out the key issues before seeking Member endorsement to submit the comments set out in Annex B as our formal response to the consultation.
8. The key issues for the Council to respond to cover the following:
 - York's role in the region
 - The York Green Belt
 - Leeds City Region
 - York sub area
 - Housing
 - Economy
 - Transport
 - Environment and Climate Change

York's role in the region

9. York is identified as one of 12 "Sub Regional Cities", with Leeds, Sheffield (and now Hull) designated "Regional Cities". This does not adequately reflect the key regional role that York plays in higher education, tourism, retailing and the economy. York is placed in the same part of the hierarchy as towns such as Scarborough, Scunthorpe and Grimsby, yet has a greatly different regional role. We believe that York's 'regional' role should be recognised in the final RSS. A similar case could be made for Bradford. For some time these five cities were identified as the Key Cities in economic terms in the region.

The York Green Belt

10. The EIP Panel Report said that the York Green Belt boundary should "endure beyond the life of the Regional Plan" (Recommendation 13.1 ix) b)). The Proposed Changes are now saying it must endure "well beyond" the life of the Plan. PPG2 indicates the essential characteristics of Green Belt is their permanence and their protection must be maintained as far as can be seen ahead. A period 20-25 years

was the indicative timescale given by the York draft Local Plan Inspector. From adoption of the Local Development Framework Core Strategy (in 2009), this would take the Green Belt in York to at least 2029. Clearly 2029 is beyond the life time of RSS but the term “well beyond” is considered vague. The RSS policy should instead refer to “creating a permanent Green Belt boundary” with the end date to be determined through the LDF process to reflect local circumstances.

Leeds City Region

11. The policies for Leeds City Region (of which York is part) in the RSS and Proposed Changes are generally fine, recognise York’s role and would provide an appropriate policy context in which we can progress our Local Development Framework.
12. We do however have a serious concern about the omission of any reference to York Northwest in Section E of Policy LCR1 which deals with Strategic Patterns of Development in the Leeds City Region. We also have a serious concern that it is not identified under Policy LCR2 which identifies “Regionally Significant Investment Priorities for the Leeds City Region.” This policy identifies where public and private sector investment will be targeted. It is therefore critical that York Northwest should be added, as it is one of the key investment priorities within the City Region and one of the four key New Growth Points identified in the Leeds City Region New Growth Point bid recently submitted. The Regional Assembly support this viewpoint and will be making similar representations.

York sub area

13. The Council made strong representations for a separate York sub area to be included in Draft RSS to reflect York’s relationship with its wider hinterland in terms of its economy, housing markets, retail and transport. This ‘overlaps’ with York’s role as part of the Leeds City Region in the draft RSS. The concept and extent of the York sub area was endorsed by the Panel at the EIP. The Proposed Changes to Policy Y1 add further strength to the policy approach and are generally to be welcomed. We do however object to the deletion of the words “Develop York as a key driver of the regional economy” as this takes away from the importance of York’s important regional economic role.

Housing

14. Our response to the Proposed Changes focuses on three key issues:
 - The Housing Numbers
 - Affordable housing
 - Mix and type of housing

Housing Numbers

15. The housing requirement for York has increased from **640/620** per year in the Draft RSS to **850** (after 2008) in the Proposed Changes. The Council’s response to the increased housing numbers for York needs to take account of the higher household projections published since the Draft RSS, the Panel Report and the findings of our own Housing Market Assessment. Some context re ‘the numbers’ is therefore given before we set our a proposed response.

16. In the North Yorkshire Structure Plan and draft Local Plan York was required to build **670** homes per year. This was less than the projected household growth at the time (700 new households per year) and reflected a policy of relative restraint given York's sensitive historic environment and Green Belt setting.
17. In the draft Regional Spatial Strategy (2005) this requirement was reduced to **640** up to 2016 and to **620** from 2016 to 2021 - again to reflect environmental constraints including York's sensitive historic environment and Green Belt setting.
18. Since the Draft RSS was published revised 2003-based national household projections were published (2006), which showed significant projected growth in the number of households nationally and in York (765 new households per year). This reflects a growing population, smaller households and people living longer.
19. The Panel who held the EIP into the draft RSS published their report in May 2007. They recommended that York accommodate **640** new homes per year from 2004-2011 and **850** per annum from 2011 to 2021. The Panel also concluded that, using the 2003 based household projections and projecting the last five years economic growth forward (Economic Scenario B), the housing requirement for York *could* be **984** dwellings per annum, but stated:

"In spite of York's increased housing provision [from 640 to 850 pa after 2011] we consider that this does not fully reflect the development of York as a key driver in the Region's economy and the significant investment priorities as outlined in Policy YH1 of the Plan. We have considered the Scenario B provision for York [i.e. 984pa] but consider that there could be difficulty in accommodating this level of increase whilst still safeguarding the historic character of York and its environmental constraints..."
20. The Panel therefore recommended an annual requirement for York at a mid-point - that is **850** dwellings per annum. They concluded that this does not necessarily mean that York could not accommodate a higher level of increase in the future but that further work needs to be undertaken through the RSS review and the LDF to establish the environmental capacity of York.
21. A new set of national household projections (2004 based projections) was published in 2007 *after* the EIP. These predicted even higher levels of household growth nationally and for York (1055 new households per year) with the significant increase reflecting much higher inward migration being assumed, both nationally and in York. The Proposed Changes to RSS increase the overall level of housing for York recommending that the 850 requirement starts earlier - 2008 rather than 2011 - and will cover a longer RSS plan period to 2026.
22. The 2007 York Strategic Housing Market Assessment (SHMA) concludes that, to achieve a balanced housing market in York, **982** new dwellings would be required per annum. The fact that demand/need exceeds the RSS target is not necessarily a compelling argument for changing that target. Many other factors have to be borne in mind, including infrastructure constraints, the need to protect the special character and setting of the city, and the SHMA acknowledged this.
23. In the light of the above we need to consider our response. There are pressing housing needs in the city and a need to better align housing and economic growth, whilst recognising that York's economic role providing jobs for a wider hinterland

and environmental constraints means that a complete match would not be appropriate. We therefore recommend the following response:

“Despite concerns regarding the ability of the City to absorb the additional numbers (up from 640 to 850 per annum in the Proposed Changes and for a further 5 years to 2026) we recognise the higher household projections since the Draft RSS (in 2005) and the market demand/need identified in our recent Strategic Housing Market Assessment (2007). We would, therefore, be prepared to accept a step up to 850 per annum. This should, however, be from 2011 not 2008, to allow time to put the necessary LDF spatial strategy in place in a way that reflects York’s environmental constraints and addresses transport infrastructure constraints. This reflects the Examination in Public (EIP) Panel’s recommendations that the step up should start in 2011. Additional growth must be conditional on two key things:-

- 1) *A recognition of the important role that brownfield Windfalls will play in future housing land provision. They have been a key element of our provision in York over the last 10 years and some account must be allowed for them over the longer period of the RSS to 2026. Without this it will lead to unnecessary release of greenfield land, counter to the Core Policies of the RSS.*
- 2) *Substantial assistance with infrastructure costs being made available through national and regional sources. Without this extra funding, then the significantly increased growth will lead to serious traffic congestion in what is already a physically constrained historic city. The step change in growth needs to be matched by a step change in infrastructure provision to support it, otherwise sustainable development will not be achieved.”*

Affordable Housing

24. We welcome the recognition in Policy H3 that LDF’s should set targets for affordable housing, and the provisional estimate that in North Yorkshire (including York) “over 40%” is likely to be needed. We welcome the reference in paragraph 13.43A that the figures will need to be reviewed in the light of findings from Strategic Housing Market Assessments. We also welcome the recognition in para 13.43 that “The Planning System has a key role in delivering affordable housing through the allocation of sites for development and the use of planning obligations ...”.

Housing mix and type

25. We welcome the new references in Policy H4 to providing “a mix of housing” that reflects the needs of the area “including for family housing”. This is critical to achieving sustainable communities and provides a clear steer for LDF documents. We also welcome the new wording in Para 13.50 that “Detailed analysis through strategic housing market assessments will inform the implementation of Policy H4”. This gives a clear steer on the importance of SHMA’s in setting appropriate policies on mix and type in LDF’s.

Economy

26. Our response to the Proposed Changes focuses on the job growth numbers. Some other issues are also addressed. These are dealt with below.

The Job Numbers

27. The RSS Proposed Changes identifies much higher levels of economic growth for York (2132 additional jobs per year) compared to the Draft RSS which included projections that ranged from no growth to up to 544 new jobs per year. We objected to the Draft RSS on the basis that the figures were too low. The York Employment Land Review (ELR) (2007) carried out for our LDF included detailed econometric modeling which showed that York could grow by 1060 new jobs per year. We think these figures are realistic, reflect past rates of growth in York, would allow Science City York to grow at 5% per year in accordance with agreed policy, and would allow York to fulfill its important local and regional economic role. We believe the Proposed Changes figures are too high, are not realistic and include a significant element of double counting.
28. The latest RSS economic projections, on which the Proposed Changes are based, add 'transformational projects' to their baseline scenario to get these higher levels of growth. In York these include projects such as the University expansion, York Central, Vanguard (Monks Cross South) and Terry's. The sites identified above will provide the opportunities to accommodate the growth predicted in our ELR growth projections - they will not provide job growth additional to that in our detailed projections - that would be double counting. The York ELR economic projections provide a more realistic way of looking at job growth and our response to the RSS Proposed Changes makes this clear.
29. Having credible employment figures is also important in trying to achieve a reasonable balance of housing and economic growth. The RSS Proposed Changes are recommending 850 new homes per year for York. This is a reasonably close match with the York ELR predicted employment growth for York of 1060 additional jobs per year, given York's sub regional economic role in providing employment for people across a wider hinterland, and given York's environmental constraints.
30. The much higher levels of economic growth in the RSS Proposed Changes (2132 additional jobs per year) is much higher than anything achieved previously in York and would lead for a call for much higher levels of housing to more closely match this. This would not be a sustainable position given the environmental and transport capacity issues facing the city.
31. The thrust of RSS policy is to rely on Local Employment Land Reviews to identify what is needed locally. The findings of our detailed local economic modeling, as part of the York Employment Land Review, should therefore be given significant weight in deciding on the correct figures for York and we make this clear in our representations. Our proposed response in Annex B has been drafted to reflect the above concerns and to highlight the need to rely on local employment land reviews in setting local job forecasts for York.

Other economic issues

32. We welcome the clarification in Policy E2 covering Town Centres and Major Facilities that Regional and Sub Regional city and town centres will be the main focus of office development (B1(a) Use Class), retail, leisure, entertainment, art culture and tourism. This reflects national policy guidance in PPS6 (Planning for Town Centres) and will provide the appropriate policy for ensuring the key role of York City Centre is protected and enforced.

33. We welcome the strengthening in wording that no further development of new, or expansion of existing, out of centre regional or sub-regional shopping centres should be allowed. This strong policy is needed to protect City Centres such as York where competition from major out of centre retail centres is strong.
34. We also support the reference in Policy E3 (Land and Premises for Economic Development) on the need to take account of “The ongoing restructuring and modernisation of the manufacturing sector”. However, we are concerned about the references in Table 14.6 to the need for an additional 90 hectares of land in York for industrial and storage distribution uses to 2021. This does not accord with the findings of our York Employment Land Review which identified a negative residual requirement for such uses over the same period, with a short term requirement to make some land available for smaller industrial units to meet pent up demand.
35. Part B of Policy E3 says that employment land reviews for LDF’s should “take account of” the job growth and employment land tables in RSS “along with more detailed sub regional or local forecasts”. Whilst we welcome this recognition of the importance of local employment land reviews we believe they should be given much greater weight in the wording of this policy to give clarity that the information in local employment land reviews will have primacy.

Transport

36. In response to Policy T1 on Personal Travel Reduction and Modal Shift we believe that it should be made clear that any road user charging initiative must be part of a National Framework. This was deleted in the Proposed Changes and the reference should be re-instated.
37. In response to Policy T3 on Public Transport we believe that the deletion of the reference to key public transport corridors diminishes the perceived status of York station.
38. In terms of the regional Transport Investment and Management Priorities set out in Table 16.24A we have a number of concerns. In stating the high priority to category “A” schemes which concentrate extensively on very expensive inter-urban road and rail routes, the potential investment is skewed away from sustainable transport initiatives in urban areas. The inclusion of demand management (Transport Investment and Management Priority A1) is too specific and will not be the best solution to the transport challenges in all cities. The position of this initiative as priority “A1” implies top priority status. The need to improve public transport links is noted as priority “A7”, but with a diminished status.
39. The concern is that the “B” priorities may be overlooked, and “C” priorities disregarded entirely and in so doing, urban areas might only be supported with the integrated transport projects if demand management, particularly Road User Charging forms part of the package. A single solution to a variety of geographical and economic circumstances seems too prescriptive.
40. It is disappointing that there is no reference to the improvements to York’s Outer Ring Road as this route is a very important sub regional route and is part of the integrated transport package for the sub regional transport corridor and Leeds City Region. The important transportation links shown on figures 9.2 and 16.2 utilise the Outer Ring

Road so the absence of a reference to its improvement is seen as inconsistent. It is of particular concern that the specific needs of York, an important sub regional/regional centre, are only included in the second priority list (B5). Indeed, the priority B5 is at the bottom of the list, implying this is the lowest priority in this category.

The Environment and Climate Change

41. Our response to the Proposed Changes focuses on four key issues:

- Climate Change
- Green Infrastructure
- On-site renewable energy generation
- Bio-diversity

Climate Change

42. The Draft RSS policy (YH2) on Climate Change and Resource Use said that plans strategies, investment decisions and programmes should help to meet the region's targets to reduce greenhouse gas emissions by at least 20% below 1990 levels by 2010 and 25% below 1990 levels by 2015. These targets have been deleted from policy YH2 in the Proposed Changes. We strongly believe that the deletion of these targets seriously weakens the RSS and therefore the ability of local authorities to provide target based effective policies in their LDF's.

Green Infrastructure

43. We welcome the addition of a new policy on Green Infrastructure (ENV 15) and the requirement for LDF's to define green infrastructure in terms of its location, function, size and levels of use. Green Infrastructure is defined as the network of protected species, nature reserves, green spaces and greenway linkages. Green infrastructure should provide (where possible) multi-functional uses, i.e. wildlife, recreational and cultural experiences as well as flood protection and microclimate control. It should also operate at all spatial scales, from urban centres through to open countryside. To accommodate growth in a sustainable way and to help combat the effects of climate change Green Infrastructure will be a critical component to any development strategy in the region and in York in particular. We suggest a number of proposed changes (in Annex B) which we feel would strengthen the clarity and importance of the policy.

Energy

44. In policy ENV5 the removal of clause B iii (the requirement for 10% of energy in sizeable new development to come from on-site Renewable Energy sources), coupled with the requirement that only grid-connected capacity should count towards meeting targets, significantly weakens local authority influence over microgeneration. While the expectation is that all local authorities should include on-site renewables policies within their LDF's, until LDF policy is in place there would be a policy gap with respect to on-site renewables. Draft RSS policy is currently being used as a material consideration in determining planning applications.

45. In addition, the wording of clause A3 (in policy ENV5) establishes a threshold of 2MW for Combined Heat and Power (CHP) schemes- we consider that it is feasible to integrate combined heat and power systems to schemes whose energy demands are less than 2MW- this is particularly relevant since the majority of North Yorkshire's potential is expected to come from renewable heat rather than electricity. The threshold should therefore be removed from regional policy and established at a local level.

Bio-diversity

46. We have put forward a number of comments to Policy ENV8 to seek greater reference to the importance of local sites of bio-diversity value within RSS and seeking additional text in the policy stating that existing non-statutory sites should be retained and enhanced.

Corporate Priorities

47. Our proposed responses to the RSS Proposed Changes have been framed to accord with the following corporate priorities from the recently refreshed Corporate Strategy:
- Decrease the tonnage of biodegradable waste and recyclable products going to landfill
 - Increase the use of public and other environmentally friendly modes of transport
 - Improve the actual and perceived condition and appearance of city's streets, housing estates and publicly accessible spaces
 - Improve the health and lifestyles of the people who live in York, in particular among groups whose levels of health are the poorest
 - Improve the life chances of the most disadvantaged and disaffected children, young people and families in the city
 - Improve the quality and availability of decent affordable homes in the city
 - Improve our focus on the needs of customers and residents in designing and providing services

Implications

48. The following implications have been assessed:
- **Financial** - None
 - **Human Resources (HR)** - None
 - **Equalities** - None
 - **Legal** - None

- **Crime and Disorder** - None
- **Information Technology (IT)** - None
- **Other** - None

Risk Management

49. In compliance with the Council's risk management strategy, there are no significant risks associated with the recommendations of this report.

Recommendations

50. That Members:

- (1) Consider the proposed Council response to the Secretary of State's Proposed Changes to the RSS as attached at Annex B and approve them for submission to Government Office by the deadline of 21st December 2007.
- (2) Delegate to the Director of City Strategy the making of any incidental changes to the Council's response to the Proposed Changes that are necessary as a result of Members considering this report.

REASON: To ensure that the views of the authority are taken into account before the publication of Regional Spatial Strategy in Spring 2008.

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Specialist Implications Officer

None

**Report
 Approved**

Date

Wards Affected:

All

For further information please contact the author of the report

Background Papers:

- The Draft Revised RSS incorporating the Secretary of State's Proposed Changes. For public consultation 2007 (September 2007)
- Examination in Public (EIP) Panel Report (March 2007)
- The Regional Spatial Strategy – Draft for public consultation (December 2005)

Annexes

- Annex A 'Key messages' from CYC previous response to emerging RSS (Executive Jan/Feb 2005)
- Annex B Proposed City of York Council Response to the Secretary of State's Proposed Changes to Draft RSS

Annex A: 'Key messages' from Report to Executive on the RSS Issues and Option Stage (January / February 2005)

"It is officers view that a number of key messages should be relayed back to the Regional Assembly to inform their draft RSS work:

- Protecting the special setting of York and in particular its Green Belt should be recognised as a significant consideration in any policy options put forward in the draft RSS regarding the scale and location of development in York. A long term Green Belt to 2021 has been set through work on the Local Plan to date, which will be used as a basis for taking forward the new LDF for York.
- The Economic role of York as one of the five Key Cities in the region should be given explicit recognition in the draft RSS. The Specific role of Science City and the University as drivers for economic success should also be recognised. The role of York Central as a regional economic driver and employment site should be given explicit recognition.
- The acute affordable housing needs of the city should be recognised and appropriate policy responses supported in the RSS, such as the Golden Triangle Partnership which is seeking to develop solutions to the high affordable housing needs between Leeds, Harrogate and York.
- The specific transport priorities that flow from the continued economic success of York and its relationship with surrounding settlements need to be given explicit recognition. Capacity improvements to the A64 and enhancements to the York-Harrogate and York-Malton-Scarborough rail links should be recognised
- Specific policy responses should be developed within draft RSS that address the spatial planning issues for the York hinterland that flow from very particular circumstances – York's continued economic success; increased pressure on wider housing markets; acute affordable housing problems; heritage, environment and Green Belt constraints within the City; and the need for surrounding communities to meet their local needs and benefit from the economic success of York to aid their renaissance and achieve sustainable communities.
- That a balanced and clear approach to development is what we are seeking – one that recognises the economic, social and environmental needs, constraints and opportunities facing York but seeks sustainable development solutions to these within the City and by supporting mutually beneficial sustainable development within surrounding settlements.

Annex B Proposed City of York Council Response to the Secretary of State's Proposed Changes to Draft RSS

Chapter:	Policy/Paragraph/Table/Figure:	Page: (in the Proposed Changes to draft RSS)
Core Approach	N/A	19 – 40
Core Approach	Policy YH1 – Overall Approach and Key Spatial Priorities	22
Core Approach	Policy YH2 – Climate Change and Resource Use	25
Core Approach	Policy YH2	25
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Leeds City Region	Policy LCR1 – Leeds City Region and Sub Area Policy	48
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GOVERNMENT OFFICE
FOR YORKSHIRE AND THE HUMBER

THE YORKSHIRE AND HUMBER PLAN THE SECRETARY OF STATE'S PROPOSED CHANGES COMMENTS FORM

Representations about the Secretary of State's Proposed Changes are invited and must be received by GOYH before **4pm on Friday 21 December 2007**. We will be able to deal with responses more quickly if they are made online. Alternatively, completed comments forms can be submitted by email, post or fax.

- To make an ONLINE RESPONSE please visit: www.goyh.gov.uk
- Please send this comments forms by EMAIL to: yhregionalstrategies@goyh.gsi.gov.uk
- Please send comments forms by FAX to: 0113 3413076
- Please send comments forms by POST to: Regional Strategies Team, GOYH, Lateral, 8 City Walk, Leeds, LS11 9AT

Please note that all comments will be made available for the public to read – they cannot be treated as confidential. All comments received will be taken into account before the Yorkshire and Humber Plan is finalised and published, currently expected to be in Spring 2008. If you wish to be notified when the Plan is finalised and published please tick here

Section A: Your Contact Details

Comments by or on behalf of:		Agent (if applicable):	
Organisation	City of York Council	Organisation	N/A
Surname	Caulfield	Surname	
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These comments are being made on behalf of (please tick most appropriate)			
Private individual		Development company	
Local Authority	✓	Utility company	
Parish Council		Other company / business	
Government Agency		Campaign group	
Other public sector body		Voluntary / community group	

You need only fill in Section A of this form once irrespective of how many different parts of the Plan you wish to comment on. For each different part of the Plan you wish to comment on, please complete a separate Section B of this form and attach these to the completed Section A.

Section B – Your Comments

Please note that comments are invited about the Secretary of State's Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

Which part of the Plan that we are proposing to change are you commenting on?

Page: 19-40	Core Approach Chapter
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>
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Why do object to or support the proposed change?

1. We support the retention of the Plan's Core Approach with its emphasis on cities and towns as the most sustainable focus for new development and managing the environment as a key resource. We do object to Proposed Changes to certain of the policies in this section and these are dealt with in separate representations submitted.
2. We have concerns about the fundamentally different scale of growth now being planned for (both housing and economic) and would emphasise that a step change in investment for transport, social and green infrastructure is needed to deliver these higher rates of growth in a sustainable way.

What further change would you like to be made to the Plan?

1. No change.
2. This should be addressed at the front of the document by the addition of an additional paragraph. Add to supporting text after policy YH1.

"It is recognised that a step change in investment for transport, social and green infrastructure is needed to deliver the higher rates of growth set out in the Plan if development is to be delivered in a timely and sustainable way."

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

Please note that comments are invited about the Secretary of State's Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

Which part of the Plan that we are proposing to change are you commenting on?

Page: 22	Policy YH1 (Overall Approach and Key Spatial Priorities)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment
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Why do object to or support the proposed change?

We welcome the additions to Part B at 6 to "protect and enhance the region's environmental resources including areas of international and national importance" and at 7 to "ensure that transport management and investment support and help to deliver the spatial strategy". Both are critical components of achieving sustainable development.

What further change would you like to be made to the Plan?

None.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Please ensure that your comments relate clearly to a specific part of the Plan (e.g. a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

Which part of the Plan that we are proposing to change are you commenting on?

Page: 25	Policy: YH2 (Climate Change and Resource Use)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

The deletion of the targets within section A of policy YH2 seriously weakens it and therefore the ability of LA's to provide target based, effective policies in their LDF's. The Draft supplement to PPS1 (Delivering Sustainable Development) Planning and Climate Change is quoted in the reason for this change, essentially that targets should be avoided that are beyond the influence of the RSS. However other parts of the PPS contradict this as in paragraph 10 page 15 which states 'Regional Planning bodies should not bring forward policy on climate change in isolation from other regional considerations. Climate Change should be a key and integrating theme...' it then goes onto demonstrate the policy areas in which this could be done – thus demonstrating the influence policies in a RSS have on tackling climate change and helping to meet targets.

In paragraph 12 page 16 of the PPS (from which the statement comes to support the removal of the targets in the policy) it states 'Targets can provide helpful yardsticks for assessing successful implementation when their likely achievement derives directly from identified policies in the RSS.' It is recognised that not all policies in the RSS will achieve this and that those that do will not be the only policies and actions that help to meet the target, but they do make a significant contribution, significant enough for the continued inclusion of the targets in the policy. In addition the PPS clearly states in paragraph 10, the holistic nature of tackling climate change and that all policy areas, spatial, economic, environmental have key roles to play. The removal of the target from this policy in a major strategic document for the region is a retrograde step and does little to support the work LA's are trying to deliver to tackle climate change in a serious and coordinated manner.

In the justification to the Proposed Changes it suggests that a solution to the removal of the target from the policy is to develop trajectories for carbon performance of new residential and commercial development at the next review of the RSS. We consider this is inadequate for a number of reasons:

- Restricting the assessment of carbon performance to these two areas of activity is too narrow. While it is recognised that these are major areas of influence for the RSS, the PPS clearly states the integration of climate change into all policies.
- The use of trajectories confuses the issue of tackling climate change. A trajectory only identifies a rate of change. If this is not related to an overall target stated in a policy any trajectory set at a later date will be unrealistic and will miss the opportunity to really tackle this globally important issue.
- It appears very difficult to understand how realistic trajectories for action can be set

without a clear direction of travel that a policy based target offers.

What further change would you like to be made to the Plan?

None

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Please ensure that your comments relate clearly to a specific part of the Plan (eg a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

Which part of the Plan that we are proposing to change are you commenting on?

Page: 25	Policy: YH2 (Climate Change and Resource Use)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

In the Proposed Changes it concludes that the addition of recommendation 3.9 from the EIP Panel (to refer to policy H4) is not implemented. Whilst we recognise that referring to other policies, as part of another is not ideal it does clearly demonstrate that tackling Climate Change if we are to take the issue seriously, is about integrating it into the whole of the RSS. This approach is advocated in the Draft PPS Planning and Climate Change paragraph 10 page 15 which states 'Regional Planning bodies should not bring forward policy on climate change in isolation from other regional considerations. Climate Change should be a key and integrating theme...'.

What further change would you like to be made to the Plan?

Put a cross reference to policy H4 in policy YH2 as per the EIP Panel recommendation.

These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 29	Policy YH5 (Regional Cities and Sub Regional Cities and Towns)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

York is identified as one of 12 "Sub Regional Cities", with Leeds, Sheffield (and now Hull) designated "Regional Cities". This does not adequately reflect the key regional role that York plays in higher education, tourism retailing and the economy. York is placed in the same part of the hierarchy as towns such as Scarborough, Scunthorpe and Grimsby, yet has a greatly different regional role. York's regional role should be recognised in the final RSS.

What further change would you like to be made to the Plan?

Include York as a Regional City. The same case could also be made for Bradford.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 38	Policy YH9 (Green Belts)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

The EIP Panel Report said that the York Green Belt boundary should "endure beyond the life of the Regional Plan" (Recommendation 13.1 ix b)). The Proposed Changes are now saying it must endure "well beyond" the life of the Plan. PPG2 (Green Belts) indicates the essential characteristics of Green Belt is their permanence and their protection must be maintained as far as can be seen ahead. A period 20-25 years was the indicative timescale given by the York draft Local Plan Inspector. From adoption of the LDF Core Strategy (in 2009), this would take the Green Belt in York to at least 2029. Clearly 2029 is beyond the life time of RSS but the term "well beyond" is considered vague. The RSS policy should instead refer to "creating a permanent Green Belt boundary" with the end date to be determined through the LDF process to reflect local circumstances.

What further change would you like to be made to the Plan?

The wording in Section C of the policy should be amended to say "The boundaries must take account of the levels of growth set out in this RSS and must also endure beyond 2026 to create a permanent Green Belt boundary"

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 48

Policy LCR1 (Leeds City Region Sub Area Policy)

Do you object or support the proposed change (please tick one)?

Support

Object

Comment

Why do object to or support the proposed change?

- Section E Strategic Patterns of Development refers to the "Regionally Significant Investment Priorities" covered in Policy LCR2. York Northwest should be added to this Section, as it is one of the key investment priorities within the City Region and one of the four key New Growth Points identified in the Leeds City Region New Growth Point bid recently submitted.
- Section A – the Panel Report (Recommendation 10.5) said that particular attention should be given to the role of Bradford and in the Proposed Changes a separate reference (A3) is made to transforming Bradford. York is then listed along with other "Sub Regional Cities and Towns" for "enhanced and complementary roles". This intentional (or implied) change in the hierarchy of places does not reflect the key role York plays as a major city within the Leeds City Region – it should be treated on a par with Bradford in terms of its role in the Leeds City Region.

What further change would you like to be made to the Plan?

- Section E – Suggested wording change:
" Deliver at York Northwest a significant number of new homes as well as a new central business district for York and a mix of other employment and tourism uses."
- Section A – Suggested wording change:
"Develop the role of York as a key regional city by balancing growth in jobs and homes whilst protecting the special historic character and setting of the city."

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 50	Para 6.1 (LCR1 – Leeds City Region Sub Area Policy)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

The EIP Panel Report (Recommendation 10.2) said that it should be made clear that aspects of Policies LCR1 and LCR2, which affect the Sub Regional Centres in the City Region, apply to York (and Barnsley). The deletion of Paragraph 6.1 which says that Section 6 (Leeds City Region) and Section 9 (York Sub area) should be read together to fully understand the LCR picture goes against this clear Panel recommendation.

What further change would you like to be made to the Plan?

Para 6.1 final sentence should be reinstated to make the need to read Section 6 and Section 9 together very clear.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 55	Policy LCR2 (Regionally Significant Investment Priorities for Leeds City Region)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

- Part A refers to improving public transport – particularly in Leeds. The Leeds City Region is polycentric and contains a number of major urban centres. Public transport investment should be focussed on these centres and the links between them and not just on the city of Leeds.
- York Northwest is a regionally significant investment priority and one of the four New Growth Points in the recent LCR bid. It should therefore be included within this policy.

What further change would you like to be made to the Plan?

- Part A – delete reference to "particularly in Leeds" and replace with "within and between the major urban centres."
- Add York Northwest to the policy with the following description: "To support the delivery at York Northwest of a significant number of new homes as well as a new central business district for York and a mix of other employment and tourism uses, through supporting the following investment requirements:
 - A package of measures to address access to the sites and improvements to the wider highway network.
 - Some re-modeling at York station to achieve optimum mix of uses at York Central and improve public transport and other access
 - Enhanced park and ride and public transport access to the sites including potential to use the existing rail corridor
 - Land remediation and mitigation of archaeological impacts
 - Flood protection and mitigation measures
 - Training programmes to access employment opportunities."

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 57	Fig 6.2
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

- The Proposed Changes recommend that relevant designations (e.g. regeneration/investment areas) of sub area significance from the York sub area that overlap with the Leeds City Region be added to Fig 6.2. York Northwest should be identified on Fig 6.2 but is not.
- There is one identified for "York University and Science Park" – it should be made clear that Science City is a citywide initiative and does not just relate to the York University campus.
- There is a green dotted line around York on the Fig which does not appear on the Key – what does this mean?

What further change would you like to be made to the Plan?

- Add York Northwest as a Regeneration/investment area to Fig 6.2
- Make it clear that Science City is a city-wide initiative and does not just apply to the University site.
- Delete or clarify what the green dotted line around York represents.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 75	Policy Y1 (York Sub Area Policy)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

- Part B – deletion of the words "York is a Key driver in the regional economy" takes away from York's Key economic role. York has been one of the success stories of the regional economy over the last decade and this is projected to continue with significant growth in knowledge and science related business (through Science City York – one of only six Science Cities nationally) and growth in financial and professional services and tourism.
- Part C1 – the addition of a reference to define the detailed boundaries of York's Green Belt is welcomed. This is a key priority within York's LDF.
- Part C3 – The reference to protecting and enhancing "internationally important bio-diversity sites" is welcomed.
- Part C6 – The reference to "improve air quality, particularly along main road corridors in York" is welcomed. However, it should be more focussed on addressing air quality within defined Air Quality Management Areas.
- Part D2 – The reference to "Implement stronger demand management in York and in relation to the strategic highway network" is welcomed but any road user charging initiative must be part of a national framework.
- Part D4 - The reference to "Improve accessibility to and within York, particularly by improved facilities for walking and cycling, increased capacity and quality of public transport, and new park and ride facilities" is welcomed. A step change in public transport provision will be needed to deliver the higher rates of growth in the RSS Proposed Changes. The text should also refer to "increased capacity on parts of the highway network" as key improvements to strategic road links such as the Outer Ring Road will be needed to accommodate the levels of growth now proposed. Investment in roads as well as public transport will be needed as part of a balanced transport package.
- Part E4 – The reference to "Focus on meeting local housing needs and economic diversification elsewhere in the Sub area" is welcomed. However, the following words "especially to the north and east of the York built up area" are confusing. The policy needs to clarify whether it is referring to the villages and rural areas immediately north and east of York (e.g. Haxby, Strensall and Dunnington) or whether it is referring to those more remote settlements within Ryedale and East Riding. This is important because settlements in close proximity to York may play a different role in meeting the needs of the City compared to those more remote from York. Also the York LDF is unlikely to make a distinction in the role of settlements based on whether they are north, south, east or west of York, but more on whether they are sustainable in terms of local, facilities, public transport access and local environmental considerations. The implied different treatment of areas north and east of York is therefore vague and unnecessary

in planning policy terms in the RSS.

Why do object to or support the proposed change? Continued .../...

- Part F1 – The reference to York Central should now be replaced with York Northwest to reflect the much larger regeneration opportunity offered by the York Central and British Sugar sites combined. The reference to “Science City at York” should be replaced with its proper designation – “Science City York”.
- Part F2 – The wording “Manage flood risk in line with the sequential test approach” is welcomed. This represents a pragmatic approach and reflects the findings of our recent strategic Flood Risk Assessment.
- B1 - The Proposed Changes do not emphasise adequately York's important economic roles as:
 - 1) A designated National Science City
 - 2) A visitor gateway for its sub-area, the city region the region and beyond.

What further change would you like to be made to the Plan?

- Part B1 - Include reference to the National Science City designation and tourism/visitor gateway in paragraph B1.
- Part B – retain “York is a key driver in the regional economy”
- Part C6 – replace with “Improve air quality in Air Quality Management Areas in York”
- Part D4 – Add “and increased capacity on parts of the highway network where essential”.
- Part E4 – Clarify whether “especially to the north and east of the York built up area” refers to those rural areas and linkages immediately north and east or those more remote areas in Ryedale and East Riding. Make it clear that around York the role of settlements will be determined by sustainability considerations including locations) rather than just on whether they are north or east of York.
- Part F1 – Replace “York Central with “York Northwest” and “Science City at York” with “Science City York”.

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City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 77

Para 9.8 (Y1 – York Sub Area Policy)

Do you object or support the proposed change (please tick one)?

Support

Object

Comment

Why do object to or support the proposed change?

- The deletion of this paragraph regarding the significant growth of the York sub area economy in the last 20 years and the future role of "Science City" and the University removes a key part of the reasoned justification to the Policy.
- The Panel Report (Recommendation 13.1 b)) said a description of York Central and Science City should be given. This could be included within paragraph 9.8, if retained. Science City is referred to under Policy YH1 at Section F1, so does need a description or explanation in the supporting text.

What further change would you like to be made to the Plan?

- Retain paragraph 9.8
- Add to paragraph 9.8 the following:
"Science City York provides support to technology based businesses in York and the wider area, and provides three technology based business clusters:
 - Bio-science York
 - Creative York
 - IT and Digital York"

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City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Pages: 79 and 80	Figs 9.1 and 9.2 (Y1 – York Sub Area)
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Do you object or support the proposed change (please tick one)?

Support	Object	Comment ✓
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Why do object to or support the proposed change?

- Fig 9.1 – It would help with clarity in the Plan if the Local Service Centres were named on this context map (as they are on context map Fig 9.2).
- Fig 9.2 – York Northwest should be added to the Regeneration/investment areas of sub area significance.
- Fig 9.2 – This does not show key roads into/from York such as the A19 (Selby and Teesside), A59 (Harrogate) and A1066 (Hull).

What further change would you like to be made to the Plan?

- Name all Local Service Centres on Fig 9.1.
- Fig 9.2 – Add York Northwest.
- Fig 9.2 – Add key roads as set out above.

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City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page:99	Policy E1 (Creating a Successful and Competitive Regional Economy)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

Section A – Says that plans and strategies should help to deliver the job growth potential indicated by Tables 14.7 and 14.7A. In Table 14.7 the annual job growth for York is identified as 2,130 additional jobs per year. This is way in excess of the potential identified in our own Employment Land Review (2007) which had detailed economic projections from Cambridge Econometrics which showed potential job growth of 1060 jobs per year. This is a realistic and sustainable figure for York, would reflect past rates of growth, would deliver Science City York aspirations to grow at 5% per year and would allow York to fulfil its important local and regional economic role. This should be referred to in the final RSS.

We are concerned that the figures in the Regional Economic Model include a significant element of double-counting. In York the "transformational projects" are the sites which will deliver our local employment projections of 1060 per year. They are not additional to those projects. Supporting text at Para 14.4 says that for the purpose of preparing LDF's, Policy E3 allows for the use of more detailed sub regional or local forecasts along with the information in Table 14.7. Policy E3 B says that local employment land reviews to inform LDF's should "take account of" the potential job growth set out in Table 14.7. To make Policies E1 and E3 consistent Policy E1 should be reworded so that plans and strategies should only have to "take account of" the employment projections projects in Table 14.7 and not "should help to deliver" as the wording currently says.

Section B – We welcome the new reference to the importance of the role of regional and sub regional Cities as key drivers of the economy.

After Section C – We welcome the new reference to plans and strategies taking into account "the modern manufacturing sector and the modernisation of manufacturing industries" as this is a key component of a diverse and balanced economy.

Section F – We welcome this strengthened reference to supporting development related to important sectors or clusters where they have specific property requirements. This is particularly important in York where different clusters that make up Science City York have specific property and locational requirements. These may change over time but the policy as worded is flexible enough to accommodate this.

Continued .../...

What further change would you like to be made to the Plan?

Section A – The policy should be recast so that plans and strategies only have to “take account of” the job growth potential indicated by Table 14.7 instead of “should help to deliver” as currently worded. The primary role of local Employment land Reviews in determining realistic and appropriate job growth forecasts should be made much clearer in this policy and the supporting tables.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 101	Table 14.7
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

We object to the annual job growth figure for York of 2,130 for the reasons set out in our response to Policy E1. The figure in our local Employment Land Review (1,060 jobs per year) would continue previous significant rates of economic growth and would be sufficient to deliver of Science City York objectives, and ensure York plays an important local and regional economic role.

What further change would you like to be made to the Plan?

Replace with the detailed job forecast from our Local Employment Land Review which projected 1,060 additional jobs per year, or replace with regional economic projections revised to remove double counting, and make it clear that local employment land projections will be given primacy in determining realistic and appropriate job growth forecasts.

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City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 103	Table : 14.7A
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

- Table 14.7A sets out an extremely detailed approach to meeting the forecasted needs of different employment land types in different locations. This is overly prescriptive and will not properly promote the wider spatial policies of the plan.
- However, we do support the distinction it draws between B1(a) office uses and B1(b) research and development/B1(c) light industry uses. This is necessary to reflect that in accordance with PPS6 (Planning for Town Centres), offices should be in the first instance focussed in town centre locations, whereas B1(b) and B1(c) uses can be located on employment sites outside of city centres.

What further change would you like to be made to the Plan?

- Delete Table 14.7A and replace it with something similar to that within the draft RSS but amend it to reflect revised economic projections (and taking into account our comments to policy E1 and Table 14.7) and to show the distinction between B1 (a) offices and B1 (b) research and development type uses)

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 104	Policy E2 (Town Centre and Major Facilities)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment
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Why do object to or support the proposed change?

- Part A – We welcome the further clarification that it will be The Regional City and Sub Regional City and Town Centres that will be the main focus of offices (B1(a)), retail, leisure, entertainment, arts, culture, tourism. This is necessary to deliver the plans core approach, it reflects national policy in PPS6 (Planning for Town centres) and will provide the appropriate policy context for protecting and enhancing the role of York City Centre.
- Part C – We welcome the strengthened wording that “No further development of new, or expansion of existing, out of Centre regional or sub-regional shopping centres should be allowed. This strong policy is needed to protect City Centres such as York where competition from major out of Centre retail centres is strong.

What further change would you like to be made to the Plan?

None

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

Please note that comments are invited about the Secretary of State's Proposed Changes to the draft Yorkshire and Humber Plan, not those parts of the Plan that are unchanged from the draft published by the Yorkshire and Humber Assembly in 2006. The Proposed Changes are listed in a Schedule and are also identified in a revised draft version of the Plan.

Please ensure that your comments relate clearly to a specific part of the Plan (eg a particular policy, paragraph, Figure or Table) and that you explain what further changes you would like to see to the Plan. This will make consideration of your comments much easier.

Which part of the Plan that we are proposing to change are you commenting on?

Page: 106	Policy E3 (Land and Premises for Economic Development)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

- Part A – We welcome the clarification that plans and strategies should make use of “appropriately located previously developed land and current allocations”. This makes it much clearer the primacy of allocating brownfield land in sustainable locations as a first priority, in accordance with the Core Approach of the Plan.
- Part A1 – We object to the reference to the job growth references in Table 14.7A, for the reasons set out in our response to that Table.
- Part A2 – We support the reference to the need to take account of “The ongoing restructuring and modernisation of the manufacturing sector”. However, we are concerned about the references to Table 14.6 as this identifies a need for an additional 90 hectares of land for industrial and storage distribution uses to 2021 for York. This does not accord with the findings of our local Employment Land Review (2007) which identified a negative residual requirement for such uses over the same period, with a short term requirement to make some land available for smaller industrial units to meet pent up demand.
- Part B – This says that employment land reviews for LDF's should “take account of” the job growth and employment land tables in RSS “along with more detailed sub regional or local forecasts”. Whilst we welcome this recognition of the importance of local employment land reviews we believe they should be given much greater weight in the wording of this policy to give clarity that the information in local employment led reviews will have primacy.

What further change would you like to be made to the Plan?

- Part A2 - make it clear that the amount of land required for different employment uses should be determined by local Employment Land Reviews.
- Part B – Change the wording to make it clear that detailed Local Employment Land Reviews will have primacy over the general employment land forecasts set out in RSS.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 107	Table 14.6 (Policy E3 – Land and Premises for Economic Development)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

The deletion of Table 14.8 from the draft RSS, which gave "key messages" for each district in terms of employment land, is a retrograde step. Table 14.6 of the Proposed changes is far less specific for York, merely saying "York may require additional allocations". This is far too general. The text in Table 14.8 of the draft RSS was very relevant and specific to York, it should be reinstated.

What further change would you like to be made to the Plan?

- Delete Table 14.6 and replace with Table 14.8 from the draft RSS.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 110	Policy E4 (Regional Priority Sectors and Clusters)
-----------	--

Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>
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Why do object to or support the proposed change?

- We support the specific reference to the named key economic sectors and clusters in this policy, including financial and business services, tourism, bio-science and digital. This gives added clarity to the plan and underlines their importance to the economic strategy for the region. These are all key sections of the York economy.

What further change would you like to be made to the Plan?

- Para 14.31 – It would be appropriate to refer to the 10 “Policy Product Areas” now identified by Yorkshire Forward which will be used in future years to guide their investment planning and strategy work.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 113	Policy E6 (Sustainable Tourism)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment <input checked="" type="checkbox"/>
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Why do object to or support the proposed change?

- We support this policy.
- Part 2A - For clarity the word “product” should be inserted after “tourism”.

What further change would you like to be made to the Plan?

- Part A2 – Add “product” after “tourism”
- Under Lead Roles on page 114 the newly formed “Area Tourism Partnerships” now need to be included and under the Main Mechanisms heading the “Tourism Strategies and Action Plans” need to be added

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 114	Paragraph: 14.42 (Policy E6 – Sustainable Tourism)
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Do you object or support the proposed change (please tick one)?

Support	Object .	Comment
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Why do object to or support the proposed change?

Rationalisation in the Sustainable Tourism Section has meant that an important part isn't being covered. Tourism development isn't just about "coping with more visitors". This is recognised in the region's tourism strategy which is designed to promote value over volume. This will often mean significant prior investment to achieve it.

What further change would you like to be made to the Plan?

After "visitors" line 6 of para 14.42 now add: - "Heritage visitor destinations have specific sensitivities but need to reflect their heritage assets in contemporary ways which may require investment especially if the Regional Tourism Strategy's aim of promoting "value over volume" is to be achieved.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 117	Policy H1 (Provision and Distribution Housing)
-----------	--

Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment
---	---------------------------------	---------

Why do object to or support the proposed change?

- Part C – We welcome the deletion of the provision targets for each planning authority for development taking place on previously developed land (PDL) and concur with the view that the percentage of PDL should be set through LDF’s on the basis of sound evidence and taking into account the higher housing numbers in the Proposed Changes.
- Our views on the proposed housing numbers in York are set out in our response to Table 13.1 of the Plan.

What further change would you like to be made to the Plan?

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 119	Table 13.1 (Policy H1 – Provision and Distribution Housing)
-----------	---

Do you object or support the proposed change (please tick one)?

Support	Object	Comment ✓
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Why do object to or support the proposed change?

- Despite concerns regarding the ability of the City to absorb the additional numbers (up from 640 to 850 per annum in the proposed changes) we recognise the higher household projections since the Draft RSS (in 2005) and the market demand/need identified in our recent Strategic Housing Market Assessment (2007). We would, therefore, be prepared to accept a step up to 850 per annum. This should, however, be from 2011 not 2008, to allow time to put the necessary LDF spatial strategy in place in a way that reflects York's environmental constraints and addresses transport infrastructure constraints. This reflects the Panel's recommendations that the step up starts in 2011. Additional growth must be conditional on two key things:-
 - 1) A recognition of the important role that brownfield Windfalls will play in future housing land provision. They have been a key element of our provision in York over the last 10 years and some account must be allowed for them over the longer period of the RSS to 2026. Without this it will lead to unnecessary release of greenfield land, counter to the Core Policies of the RSS.
 - 2) Substantial assistance with infrastructure costs being made available through national and regional sources. Without this extra funding, then the significantly increased growth will lead to serious traffic congestion in what is already a physically constrained historic city. The step change in growth needs to be matched by a step change in infrastructure provision to support it, otherwise sustainable development will not be achieved.

What further change would you like to be made to the Plan?

- The 850 per annum target for York should apply from 2011 not 2008.
- Policy H1 B refers to the importance of "investment decisions" to ensure the delivery of the housing numbers set out in Table 13.1. The section on "Monitoring, Implementation and Delivery" should include a new paragraph that recognises the importance of a step change in infrastructure (transport, social and green) to delivery the step change in housing numbers now required.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 130

Policy H3 (The Provision of Affordable Housing)

Do you object or support the proposed change (please tick one)?

Support

Object

Comment

Why do object to or support the proposed change?

- We welcome the recognition that LDF's should set targets for affordable housing, and the provisional estimate that in North Yorkshire (including York) "over 40%" is likely to be needed.
- We welcome the reference in paragraph 13.43A that the figures will need to be reviewed in the light of findings from Strategic Housing Market Assessments.
- We welcome the recognition in para 13.43 that "The Planning System has a key role in delivering affordable housing through the allocation of sites for development and the use of planning obligations ..."
- Paragraph 13.47 states that "The Greatest Challenge to affordable housing delivery will be the rural areas where the housing market is strong". This does not give the full picture. The attractive historic towns and cities such as Harrogate and York have equally pressing affordable housing needs and challenges to delivery. This should be reflected in amendments to the text.

What further change would you like to be made to the Plan?

- Para 13.47 – add after "rural areas" – "and historic towns and cities, "

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 133	Policy H4 (Housing Mix)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment
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Why do object to or support the proposed change?

- We welcome the new references to providing “a mix of housing” that reflects the needs of the area “including for family housing”. This is critical to achieving sustainable communities and provides a clear steer for LDF documents.
- We also welcome the new wording in Para 13.50 that “Detailed analysis through strategic housing market assessments will inform the implementation of Policy H4” as this gives a clear steer as to the importance of SHMA’s in setting appropriate policies on mix and type in LDF’s.

What further change would you like to be made to the Plan?

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These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 139	Policy T1 (Person Travel Reduction and Modal Shift)
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Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

Policy T1F - It is considered that any Road User Charging initiative must be part of a National Framework and this objective should be retained.

What further change would you like to be made to the Plan?

These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 145	Policy T3 (Public Transport)
-----------	------------------------------

Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

Policy T3B - York has a strategic interchange of regional and National importance. The omission of the references to key public transport corridors diminishes the perceived status of York Station and undermines the Leeds City Region concept.

What further change would you like to be made to the Plan?

These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 165	Policy T9 (Transport Investment and Management Priorities)
-----------	--

Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

T9 - Transport Investment and management Priorities:

In stating the high priority to "A" schemes which concentrate extensively on very expensive interurban road and rail routes, the potential investment is skewed away from sustainable transport initiatives in urban areas. The inclusion of demand management (Transport Investment and Management Priority A1) is too specific and will not be the best solution to the transport challenges in all cities. The position of this initiative at position A1 implies top priority status.

The need to improve public transport links is noted within A7, but with a diminished status.

The concern is that the "B" priorities may be overlooked, and "C" priorities disregarded entirely and in so doing, urban areas might only be supported with the integrated transport projects if demand management, particularly Road User Charging forms part of the package. A single solution to a variety of geographical and economic circumstances seems too prescriptive.

It is disappointing that there is no reference to the improvements to York’s Outer Ring Road as this route is a very important sub regional route and is part of the integrated transport package for the sub regional transport corridor and Leeds City Region. The important transportation links shown on figures 9.2 and 16.2 utilise the Outer Ring Road so the absence of a reference to its improvement is seen as inconsistent.

It is of particular concern that the specific needs of York, an important sub regional / regional centre, are only included in the second priority list (B5). Indeed, the priority B5 is at the bottom of the list, implying this is the lowest priority in this category.

What further change would you like to be made to the Plan?

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City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 178	Policy ENV2 (Water Resources)
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Do you object or support the proposed change (please tick one)?

Support <input checked="" type="checkbox"/>	Object <input type="checkbox"/>	Comment
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Why do object to or support the proposed change?

Support given to the reference made to the “Code for Sustainable Homes”.

Agree that 100% of publicly funded housing should meet the code level 3.

What further change would you like to be made to the Plan?

A target should be set for private housing as well as publicly funded housing. A certain % of privately built housing (i.e. developments over a certain threshold) could be required to meet the Code level 3. This threshold should be specific to the area. This would support the approach we have taken through an Interim Planning Statement on Sustainable Design and Construction and provide an ‘interim’ policy position prior to Council’s adopting detailed policies through their LDF’s.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council.

Section B – Your Comments

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 184	Policy ENV5 (Energy)
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Do you object or support the proposed change (please tick one)?

Support	Object .	Comment
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Why do object to or support the proposed change?

Part A3 - It is feasible to integrate combined heat and power systems on schemes whose energy demands are less than 2MW. While this clause seeks to maximise the use of combined heat and power, the inclusion of a reference to a threshold could constrain use of CHP.

The National Energy Foundation undertook an assessment of the likely potential uptake of micro-generation renewables by 2010 and 2021 within North Yorkshire districts. This showed indicative potential for North Yorkshire of 45MW to 2010 and 372MW to 2021. The greatest potential (particularly in the short term) is expected to come from renewable heat rather than electricity-small scale wood heating followed by solar water heating and ground source heat pumps, particularly in the short term. Micro-generation of electricity (either through PV or micro wind) is considered to offer least potential.

What further change would you like to be made to the Plan?

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These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 188	Policy: ENV15 (Green Infrastructure)
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Do you object or support the proposed change (please tick one)?

Support .	Object	Comment .
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Why do object to or support the proposed change?

Support the inclusion of a Green Infrastructure (GI) Policy in principle, however would recommend some changes:

- Point A. Remove the word “internationally” in relation to important biodiversity sites. GI should benefit all biodiversity sites.
- Point B. All components of GI contribute to its value and therefore, a hierarchy is not really appropriate as it would result in some GI assets being viewed as more valuable than others and GI, by definition functions best as a whole.
- Point B. Delivery can be a problem with these types of policies. Local Authorities should be required to produce an action plan, perhaps as a Supplementary Planning Document (SPD) to their LDF.

What further change would you like to be made to the Plan?

- Point A: Remove “internationally”.
- Point B: Replace “hierarchy” with “network”
- Point B: Add another criterion related to the delivery of GI

These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 195

Policy: ENV8 (Biodiversity)

Do you object or support the proposed change (please tick one)?

Support	Object	Comment
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Why do object to or support the proposed change?

1. The RSS seems to avoid specific reference to Local Sites, although considerable emphasis is made of international sites and certain priority habitats. If protection is only provided to such sites through the RSS then we will continue to lose the great majority of our existing biodiversity.
2. The RSS concentrates almost entirely on protecting the national and regionally distinctive. This is fine but there is a whole range of other features that are not regionally distinctive or nationally important but are increasingly threatened. It is these that make up the majority of the biodiversity of an area but seem to get little mention.

What further change would you like to be made to the Plan?

1. To avoid this a further paragraph **E** needs to be included in ENV 8 to the effect that existing non-statutory sites should be retained and enhanced, after all this is proposed as the key biodiversity target for Local Authorities and should therefore be reflected in the RSS and on into the LDF. Alternatively **C** could be reworded to be more inclusive of such existing sites. This should be accompanied in the supporting text with specific reference to the maintenance/restoration/enhancement of **local** sites as is done for international sites. This could be by adapting 15.56C to read 'The RSS aims to protect the integrity of **all** such sites, **local, national and international**, and local policies'
2. This omission could be rectified by amending the wording to 15.55 to include reference to the more widespread species and habitats found throughout many areas but are equally threatened. Such a sentence could be inserted after the first sentence of 15.55 before 'The decline in this resource'.

These comments are by or on behalf of (please insert your name as in Section A of this form:

City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 201	Policy: ENV9 (Historic Environment)
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Do you object or support the proposed change (please tick one)?

Support	Object	Comment ✓
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Why do object to or support the proposed change?

One of the targets for improved standards relating to work in the historic environment is that there are no referrals to English Heritage.

The legal notification procedures require certain types of projects to be referred to EH. Is there a conflict here?

What further change would you like to be made to the Plan?

The legal issues referred to above need to be checked, and then the plan amended if appropriate.

These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council

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Which part of the Plan that we are proposing to change are you commenting on?

Page: 206	Policy ENV11 (Health and Recreation)
-----------	--------------------------------------

Do you object or support the proposed change (please tick one)?

Support	Object <input checked="" type="checkbox"/>	Comment
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Why do object to or support the proposed change?

Section A – paragraph 3:

It talks about maximising opportunities to develop walking and cycling routes and other green infrastructure, especially through Hull and Regional / Sub Regional Cities and towns in South and West Yorkshire – but no mention of York / North Yorkshire. Clearly there is a need to promote such uses in York / North Yorkshire, but this is not acknowledged in the policy.

Overall, the policy appears to be very much focussed on Hull and South / West Yorkshire, but no mention in the actual policy of York / North Yorkshire.

What further change would you like to be made to the Plan?

In section A of the policy further promotion of health and recreation in York / North Yorkshire, especially walking / cycling / green infrastructure is needed.

These comments are by or on behalf of (please insert your name as in Section A of this form):

City of York Council
