

## CITY OF YORK LOCAL PLAN

Submission Draft  
Statement to demonstrate compliance  
with the Duty to co-operate  
April 2018



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## Executive Summary

- E1.1 Section 110 of the Localism Act, 2011, introduced section 33A to the Planning and Compulsory Purchase Act 2004 which sets out a duty to co-operate in relation to the planning of sustainable development.
- E1.2 The Duty to co-operate requires local planning authorities, county councils and prescribed bodies to *‘engage constructively, actively and on an ongoing basis [...] in the preparation of development plan documents, or the preparation of other local development documents, with other local planning authorities.*
- E1.3 Demonstrating compliance with the Duty to cooperate is critical for ensuring the plan is legally compliant. It is one of the first legal tests to be considered by an inspector at examination of the Plan at an Examination in Public (EiP). If a local planning authority cannot demonstrate that it has complied with the Duty to co-operate then the Local Plan will not be able to proceed further in examination.
- E1.3 This statement sets out the current situation with respect to ongoing engagement that has taken place in accordance with the Duty to co-operate throughout the preparation of the York Local Plan and an explanation of how that co-operation has influenced the plan, leading to positive outcomes and providing the foundation for proving that the relevant cross-boundary issues have been identified and addressed within the Local Plan, in line with the National Planning Policy Framework.
- E1.4 In preparing this statement due consideration has been given to numerous Inspectors’ reports for various local plans or core strategies that had been deemed by the Inspectors to either have demonstrated, or failed to have demonstrated that they had complied with the Duty. A review of the more recent Examinations where the Inspectors had either expressed concerns that the Duty had not been met or stated explicitly that the Duty had not been complied with showed that
- it was not clear how the [cross boundary cooperation] work undertaken fed into and influenced the preparation of the local plans, and
  - what the ‘concrete actions and outcomes’ were.
- E1.5 In view of these considerations the aspects that this statement have sought to address are as follows:
- Identify whether any prescribed body or other organisation has expressed concerns relating to a cross-boundary-issue, at any stage of the Plan’s preparation (including the LDF Core Strategy (CS) as the predecessor to the local plan), particularly in relation to meeting housing need and transport.
  - Establish whether these concerns have been addressed as the Plan has been prepared (including taking the CS forward to the local plan)
  - Identify the concerns that have not yet been addressed
    - Identify those that don’t need to be considered further
    - identify those concerns that do need to be addressed
  - Establish a way forward for addressing concerns that need to be addressed
  - Show where cooperation has influenced the plan and led to concrete actions and outcomes
  - Demonstrate how this has or will be done.

- E1.6 This statement
- Identifies the geographic extent for co-operation
  - Identifies the functional extent for co-operation
  - Identifies the thematic extent for co-operation
  - Identifies those elements that can be eliminated from the Duty to co-operate
  - Identifies those strategic matters that require co-operation
  - Sets out the case for not producing a joint plan (or plans)
  - Provides a comprehensive record of the formal and informal consultations that have taken place during the preparation of the plan.
  - Demonstrates resultant positive outcomes
- E1.7 It is the Council's view that it has complied with the requirements of the Duty to co-operate and this cooperation has resulted in the following positive outcomes with regard to the City of York Local Plan:
- it meets its own housing need (like the local development plans of its neighbours) without any undue pressure being placed on York's neighbours;
  - it addresses many of the strategic priorities in the Leeds City Region Strategic Economic Plan (SEP);
  - policies within it have been improved following consideration of the advice given by prescribed bodies and other organisations through ongoing discussion and representations at various stages of its preparation;
  - a reduction in the amount of growth around the periphery of the built up area of the city
  - it minimises the increase in inward or outward commuting;
  - West Yorkshire Combined Authority funding a pre-feasibility study for dualling the A1237 Outer Ring Road;
  - the establishment of a multi-organisation Memorandum of Understanding for the A64 Trunk Road York-Scarborough Improvements, and
  - an agreement between City of York Council (CYC), Harrogate Borough Council (HBC) and North Yorkshire County Council (NYCC) for improved rail services between York Harrogate and Leeds (NYCC is intending to fund improvements to the line).
- E1.8 The Council's view that it has complied with the requirements of the Duty to co-operate is reinforced by the views expressed by the Leeds City Region Planning Portfolios Board and the North Yorkshire and York Spatial Planning and Transport Board as member level boards in the two sub-regional areas in which the City of York is a constituent authority. **Both of these boards endorsed the approach taken by City of York Council in meeting the requirements of the Duty to co-operate in the plan making process.**

## 1 Purpose

- 1.01 This statement shows how the council has satisfied the current requirements of the Duty to co-operate (“the Duty”), which became a statutory requirement on 15 November 2011, by continuing and improving the arrangements for joint working (initially in place between 2004 and 2011/12 for the Local Development Framework Core Strategy and from 2011/12 to 2018<sup>1</sup>) in preparing the City of York Local Plan.
- 1.02 In particular, this statement will provide the evidence to support the Local Plan when it is Examined to show the LPA has, as stipulated in paragraph 182 of the National Planning Policy Framework (NPPF), prepared a Local Plan in accordance with the Duty to co-operate pursuant to S33A of the Planning and Compulsory Purchase Act 2004 (“the Duty”), and that the Local Plan is positively prepared and effective in relation to the test of “soundness”. In this respect the local planning authority should submit a plan for examination which it considers to be ‘sound’ - namely that it is:
- positively prepared
  - justified
  - effective
  - consistent with national policy
- 1.03 With regard to the list above, two key aspects of this statement are: demonstrating that cooperation has influenced the plan, and that it has produced positive outcomes.
- 1.04 This statement has been prepared in support of the City of York, Local Plan Submission Draft Local Plan (herein referred to as the Plan, as appropriate, for ease of reference),.

## 2 Introduction

- 2.01 The overarching priority for national planning policy (NPPF) is to deliver long term sustainable growth, ensuring that councils positively take into account the three pillars of sustainable development – economic, environmental and social - in their local plans. Many social, environmental and economic issues can only be effectively addressed over a number of local authority administrative boundaries. This is because people and businesses do not confine their activities to one council area. For example:
- Employees may live in one area and work in another;
  - retail development may attract customers from across a wide catchment area, and
  - people may travel to visit tourist attractions, leisure facilities or sporting venues
- 2.02 Similarly, from an environmental perspective:
- Residents in some areas may consume water and power that has travelled hundreds of miles;
  - surface water run-off in one location may present a flooding hazard to communities further 'downstream', and
  - water and air pollution may have a damaging impact on environmental assets that are some distance away.

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<sup>1</sup> The anticipated year of the Local Plan Examination and Adoption is 2018

- 2.03 It is important that in drawing up the Local Plan City of York Council recognises cross boundary strategic planning relationships and ensures that they are properly understood and addressed.
- 2.04 The City of York Council has a long history of joint working and co-operation with its neighbouring authorities and key stakeholders to achieve better spatial planning outcomes. The Local Plan is no exception. On-going and constructive engagement with neighbouring authorities and relevant organisations has taken place since work on the Local Development Framework Core Strategy (CS), as the antecedent to the Local Plan, began in 2004. It is important to note that this not only occurred locally between the City of York Council and individual neighbouring authorities and organisations, but also as part of wider planning arrangements at sub-regional and regional levels.
- 2.05 This statement sets out the current situation with respect to ongoing engagement that has taken place in accordance with the Duty throughout the preparation of the York Local Plan and an explanation of how that co-operation has influenced the plan, leading to positive outcomes and providing the foundation for proving that the relevant cross-boundary issues have been identified and addressed within the Local Plan, in line with the National Planning Policy Framework. It supersedes the Duty to co-operate papers that supported the CS submission in 2012; the Local Plan Preferred Options in 2013 and the (halted) Local Plan Publication Draft in October 2014.

### **3 The Duty to co-operate and its context**

#### **The Localism Act**

- 3.01 Section 110 of the Localism Act, 2011, introduced section 33A to the Planning and Compulsory Purchase Act 2004 (referred to here-after as the “2004 Act”) which sets out a duty to co-operate in relation to the planning of sustainable development (referred to here-after as “the Duty”). The Duty applies to all local planning authorities, county councils in England and to a number of other “prescribed” bodies.
- 3.02 The Duty requires local planning authorities, county councils and prescribed bodies to ‘*engage [with each other] constructively, actively and on an ongoing basis*’..... in the preparation of development plan documents, or the preparation of other local development documents, with other local planning authorities. If considered appropriate, this can (under section 33A (6) of the 2004 Act) include, taking a joint approach for undertaking the activities for preparing such documents and preparing joint local development documents<sup>2</sup>. The Duty also includes activities that prepare the way for or support the abovementioned activities, such as the preparation of the evidence base.
- 3.03 The Duty to co-operate should be applied where such activities relate to any “strategic matter”. A strategic matter is defined as “*sustainable development or use of land that has or would have a significant impact on at least two planning areas*”

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<sup>2</sup> If the person is a local planning authority, considering whether to agree, under section 28 of the Planning and Compulsory Purchase Act 2004, to prepare joint local development documents.



*including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas*" (section 33A (4) (a) of the 2004 Act). For York this comprises, principally, the local planning authority areas of Ryedale, Selby, Harrogate, Hambleton and the East Riding of Yorkshire, as well as recognising wider strategic issues at the Leeds City Region, the North Yorkshire and York Sub Region, and the York, North Yorkshire and East Riding Local Enterprise Partnership levels. The aim of such cooperation is to maximise the effectiveness of the development plan document.

3.04 Other public bodies, in addition to local planning authorities, are subject to the Duty to co-operate by being prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013<sup>3</sup>. Of those listed in the regulations it is considered that bodies most relevant to the City of York Council are as follows:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the Office of Road and Rail (formerly the office of Rail Regulation)<sup>4</sup>
- Highways England (where the Secretary of State is the highways authority)

3.05 The Local Enterprise Partnership (LEP) and the Local Nature Partnership (LNP) are also included as prescribed bodies under clause 33A (9) of the 2004 Act<sup>5</sup>. For York this includes the York, North Yorkshire and East Riding LEP, the Leeds City Region LEP and the North Yorkshire and York LNP

3.06 At the independent examination of a local plan, the Inspector must determine whether or not the Duty has been complied with. If it is determined that the Duty has not been met, a plan will automatically fail as not legally compliant, and cannot go forward for examination of its overall soundness.

### **The National Planning Policy Framework (2012)**

3.07 Paragraphs 178-181 of the National Planning Policy Framework (NPPF) sets out further details on how the provisions of the Localism Act should be implemented, in relation to the Duty. It states that public bodies should:

- *'Cooperate on planning issues that cross administrative boundaries, particularly those that relate to **strategic priorities** set out in paragraph 156....'* including:
  - *'the homes and jobs needed in the area [in the local plan];*

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<sup>3</sup> Planning Practice Guidance Paragraph: 005 Reference ID: 9-005-20150402, Revision date: 02 04 2015

<sup>4</sup> Several attempts were made to engage with the ORR, but it did not respond to any requests made by CYC to engage

<sup>5</sup> Through amendment in The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012

- *the provision of retail, leisure and other commercial development;*
- *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- *the provision of health, security, community and cultural infrastructure and other local facilities, and*
- *climate change mitigation and adaptation, conservation of the natural and historic environment, including landscape;*
- *undertake 'joint working on areas of common interest ....for the mutual benefit of neighbouring authorities';*
- *'....work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co ordinated and clearly reflected in individual Local Plans';*
- *'....consider producing joint planning policies on strategic matters and informal strategies such as join infrastructure and investment plans;*
- *'....take account of different geographic areas, including travel-to-work areas.....Local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable economic growth in consultation with Local Enterprise Partnerships and Local Nature Partnerships Authorities should also work collaboratively with private sector bodies, utility and infrastructure providers, and*
- *'....demonstrate the evidence of having effectively co-operated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Co-operation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the infrastructure necessary to support current and projected future levels of development.*

### **Guidance on meeting the requirements of the Duty**

- 3.08 Government guidance on the Duty, contained in its Planning Practice Guidance (PPG), states that the *'duty to cooperate is not a duty to agree.'* However, it also states that *'local planning authorities should make every effort to cooperate on strategic cross boundary matters before they submit their Local Plans for examination.'* Furthermore it makes it clear that cooperation is about more than just consultation, stating that *'LPAs should bear in mind that effective cooperation is likely to require sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone'*
- 3.09 PPG makes it explicitly clear that if a local planning authority cannot demonstrate that it has complied with the Duty then the Local Plan will not be able to proceed further in examination. Ultimately, cooperation should produce effective and deliverable policies on strategic cross boundary matters.
- 3.10 Although there is neither a definitive list of the activities that the Duty covers, and the actions that constitute effective cooperation under the duty, nor is there any advice in

PPG as to how local planning authorities can satisfy themselves about whether they have complied with the duty, PPG states that:

- *'The activities that fall within the duty to cooperate include activities that prepare the way for or support the preparation of Local Plans and can relate to all stages of the plan preparation process. This might involve joint research and evidence gathering to define the scope of the Local Plan, assess policy impacts and assemble the necessary material to support policy choices. These could include assessments of land availability, Strategic Flood Risk Assessments and water cycle studies.'*
- *'Cooperation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty.'*
- *'Section 33A (6) of the 2004 Act requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Local planning authorities are also required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.'*

3.11 Planning Practice Guidance also provides useful information relating to an authority's plan that is reliant on cooperation by another local planning authority and which is not forthcoming, in that although any such lack of cooperation should not prevent a plan from being submitted, the authority submitting it will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved.

3.12 Although the Local Enterprise Partnership (LEP) and the Local Nature Partnerships are prescribed bodies under the 2004 Act, PPG states *'Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty, local planning authorities and the public bodies that are subject to the duty must cooperate with them and have regard to their activities when they are preparing their Local Plans, so long as those activities are relevant to local plan making. Local Enterprise Partnerships and Local Nature Partnerships are prescribed for this purpose....'*

### **Fulfilling the requirements of the Duty to co-operate**

3.13 The Council considers that the requirements of the Duty can be split into two main components: the process of co-operation and the outcomes of co-operation. The Council therefore considers that there is a need to demonstrate two things:

- That it has striven to co-operate with neighbouring authorities and prescribed bodies (i.e. that constructive engagement has occurred, actively and on an on-going basis in line with section 33A of the Act 2004. In other words the process of co-operation, covered in Section 4 of this statement)
- That the basis and results of this co-operation have been positively prepared and are effective (i.e. that the relevant cross-boundary issues have been identified and addressed within the Local Plan, in line with the National Planning Policy Framework. In other words the outcomes of co-operation, also covered in Section 4).

## 4 Showing compliance with the Duty to co-operate

### Evidential context (from examination of other local plans or core strategies)

- 4.01 The City of York Local Plan Duty to Cooperate Statement, September 2014<sup>6</sup>, prepared in support of the abandoned City of York Publication Draft Local Plan, 2014, considered in substantial detail numerous Inspectors' reports for various local plans or core strategies that had been deemed by the Inspectors to either have demonstrated, or failed to have demonstrated that they had complied with the duty. The key learning points were:
- Document where and when co-operation has taken place, with whom and on what basis, as well as confirming that such positive engagement will continue;
  - show that opportunity has been allowed for prescribed bodies to raise concerns;
  - show that offers of joint working (where made and as appropriate) are taken-up, and
  - short and succinct duty to cooperate statements are effective (but length needs to be commensurate with the complexities of the area and the issues upon which to cooperate)
- 4.02 A more recent review of Examinations where the Inspectors had either expressed concerns that the Duty had not been met or stated explicitly that the Duty had not been complied with showed that it was not clear how the [cross boundary cooperation] work undertaken fed into and influenced the preparation of the local plans and what the 'concrete actions and outcomes' were.
- 4.03 The implications of the above for what this Duty to co-operate statement should do are as follows:
- Identify whether any prescribed body or other organisation has expressed concerns relating to a cross-boundary-issue, at any stage of the Plan's preparation (including the LDF Core Strategy (CS) as the predecessor to the local plan), particularly in relation to meeting housing need and transport.
  - Establish whether these concerns have been addressed as the Plan has been prepared (including taking the CS forward to the local plan)
  - Identify the concerns that have not yet been addressed
    - Identify those that don't need to be considered further
    - identify those concerns that do need to be addressed
  - Establish a way forward for addressing concerns that need to be addressed
  - Show where cooperation has influenced the plan and led to concrete actions and outcomes
  - Demonstrate how this has or will be done.

### Geographical extent for co-operation

- 4.04 The City of York sits in the centre of Yorkshire and the Humber Area, as shown in Figure 4.1. York falls within two sub-regions: the Leeds City Region (a city region and a Local Enterprise Partnership area) and the North Yorkshire and York Sub-region. Figure 4.2 shows the North Yorkshire and York sub-region (comprising the City of York, the County of North Yorkshire and the districts / boroughs within it).

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<sup>6</sup> See <http://democracy.york.gov.uk/documents/s91892/Annex%20G%20Duty%20to%20Cooperate.pdf>

Figure 4.1 Location of York within the Yorkshire and Humber Area

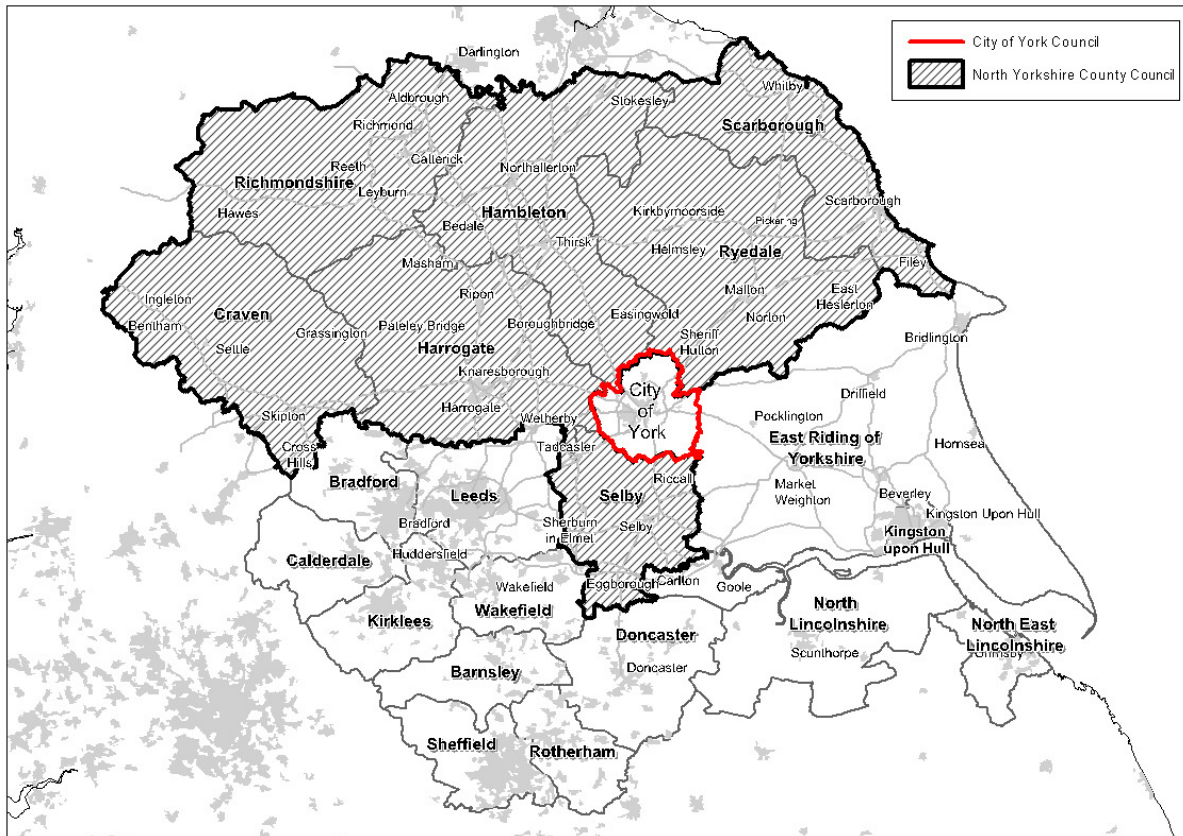
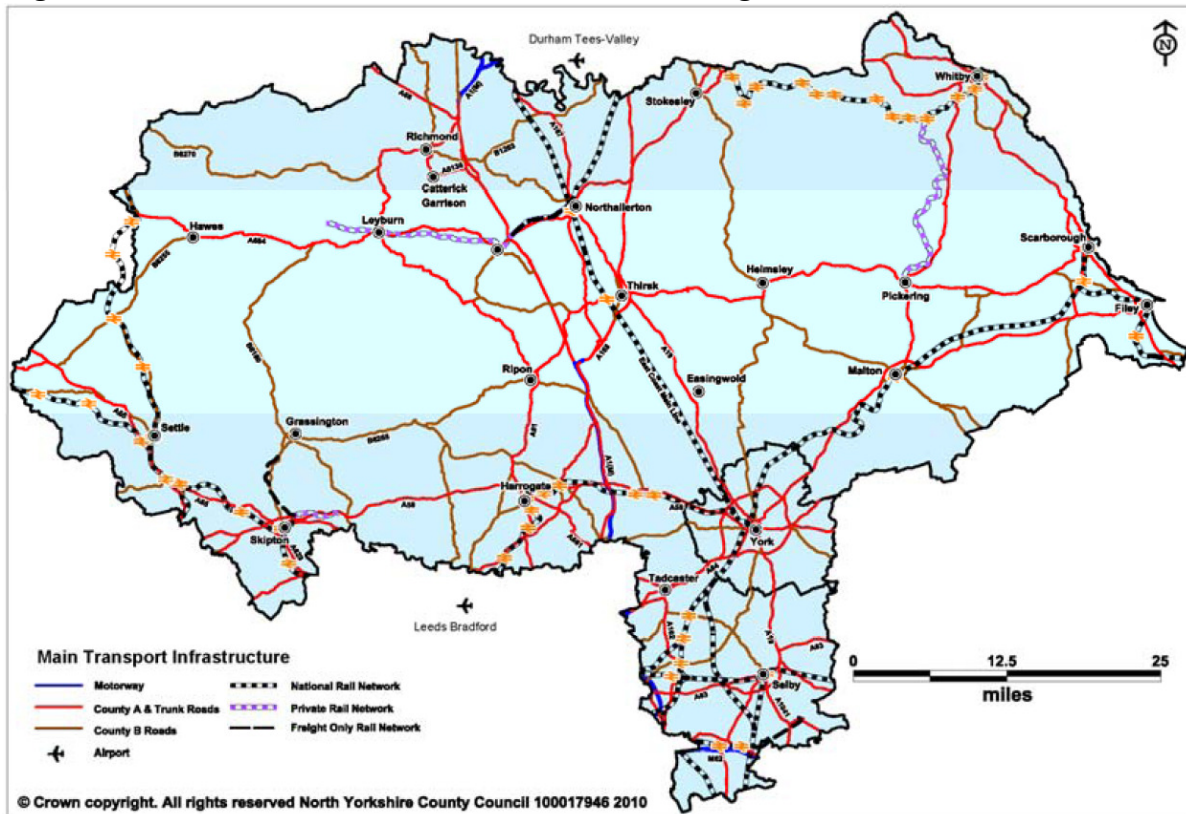


Figure 4.2 The North Yorkshire and York Sub Region





4.05 Figure 4.2 also shows the main settlements and transport links within the North Yorkshire and York Sub-area

4.06 Local Government North Yorkshire and York (LGNY) was the formal partnership governance structure between all authorities within the sub-region and its objective is *'to promote effective working between local authorities and to ensure wider local authority representation, collaboration and co-operation on a sub-regional basis and effective sub-regional representation at regional and national levels.'*

### Functional extent for co-operation

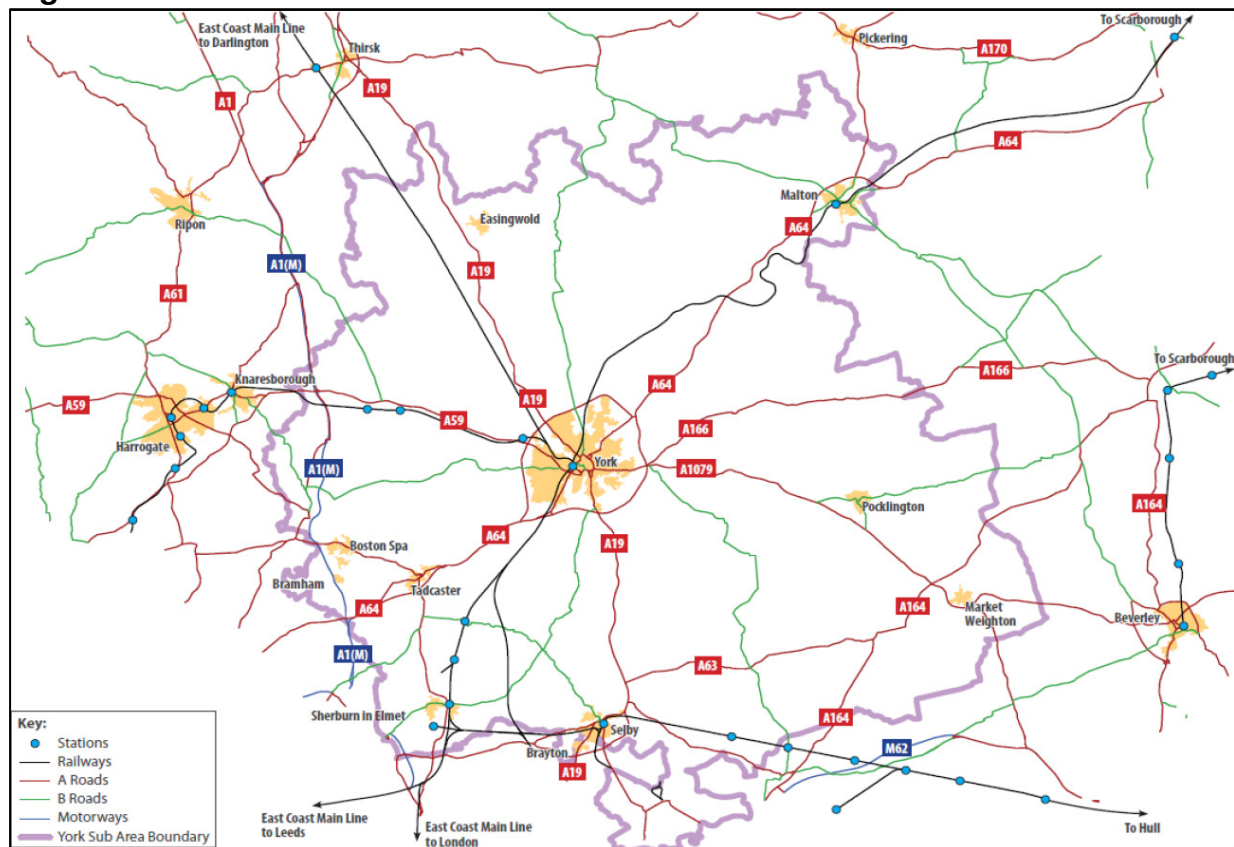
4.07 The economy of York is not restricted to the administrative geography of the Plan. People commute into the city for work and businesses have relationships such as supply chains which extend beyond the district, so the functional influence and economic areas of the City of York stretches beyond its local authority boundary. Furthermore, in recognition of York's position in the regional economy the Council is a member of two Local Enterprise Partnerships (LEPs) - the Leeds City Region LEP and the York, North Yorkshire and East Riding LEP. The Humber LEP area (which also includes the East Riding of Yorkshire) is to the east of York. These two LEP areas are shown in Figure 4 3

**Figure 4 3: York's setting with the two Local Enterprise Partnership areas of which it is a member**



4.08 A 'York Sub Area' has also been defined and a York Sub Area Study, one of the objectives of which was to examine the existing role and function of places between York and its surrounding areas, has been undertaken. The extent of the York Sub Area is shown on Figure 4.4

Figure 4.4: The York Sub -area



4.09 In terms on the functional economic geography of the city, it is important to consider a number of issues, from a business and industrial perspective. The key issues of importance to York’s functional geography include:

- The transport assets of the city which drives access to markets and a supply chain for goods and services as well as ease of access for customers, commuters and visitors: York is well connected by road and rail. Local manufacturers and retailers take advantage of the major distribution hub for the UK supply chain network located at the junction of the M1 and the M62 in nearby Wakefield, and
- access to talent and knowledge – not only through the skilled population but also through one worldclass research university (University of York), one civic university (York St. John) and two outstanding further education colleges at York College and Askham Bryan.

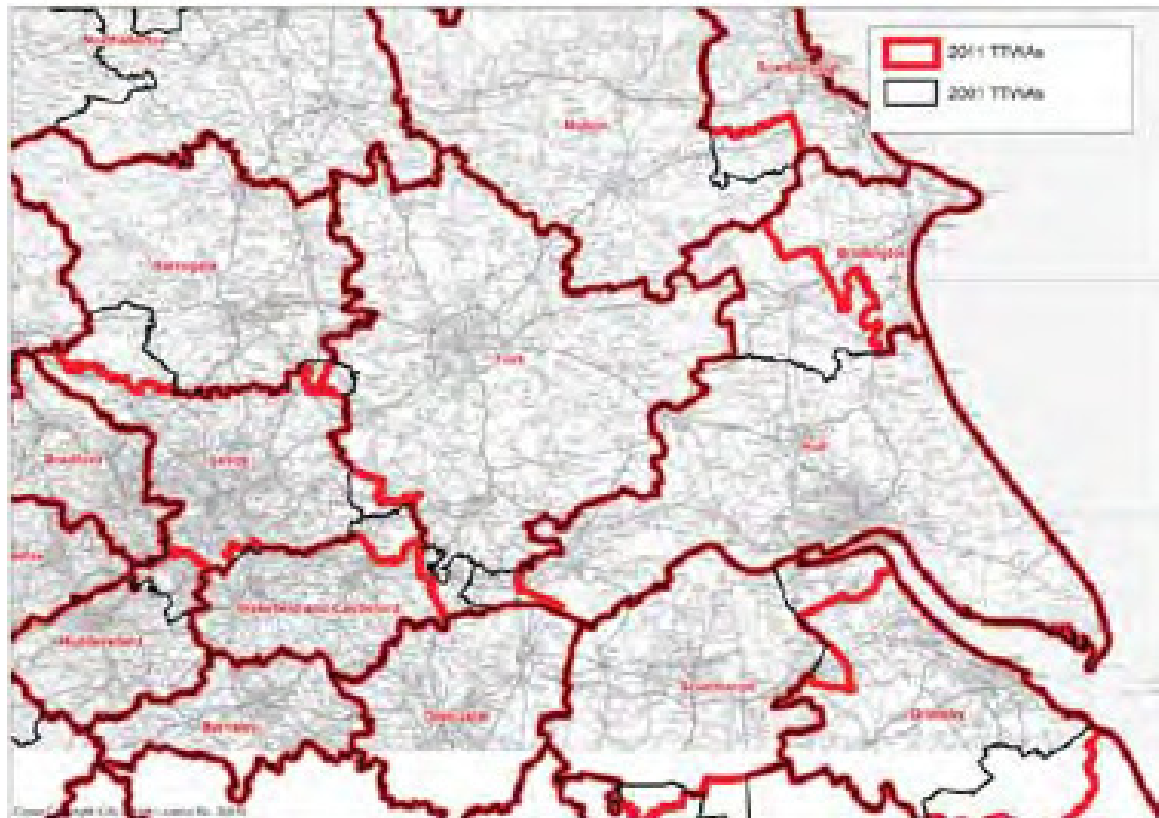
4.10 From a sector perspective, York looks in several directions in terms of its economic geography. The main sectors include the following:

- Professional services;
- creative services
- healthcare;
- insurance services;
- tourism, and
- agri / bio - technology

4.11 NPPG recommends looking at Travel to Work Areas (TTWA) drawn from analysis of travel to work patterns using census data. The office of National Statistics (ONS)

published the TTWAs drawn from the analysis of the 2011 census, in August 2015. Figure 4.5 shows the extent of the York TTWA and the changes to the boundary when compared to the previous (2001) TTWA. From this it can be seen that the York TTWA covers a much larger area than the York unitary authority area and the consequent Plan area.

**Figure 4.5 2011 York travel to work area (TTWA) compared to the 2001 TTWA**



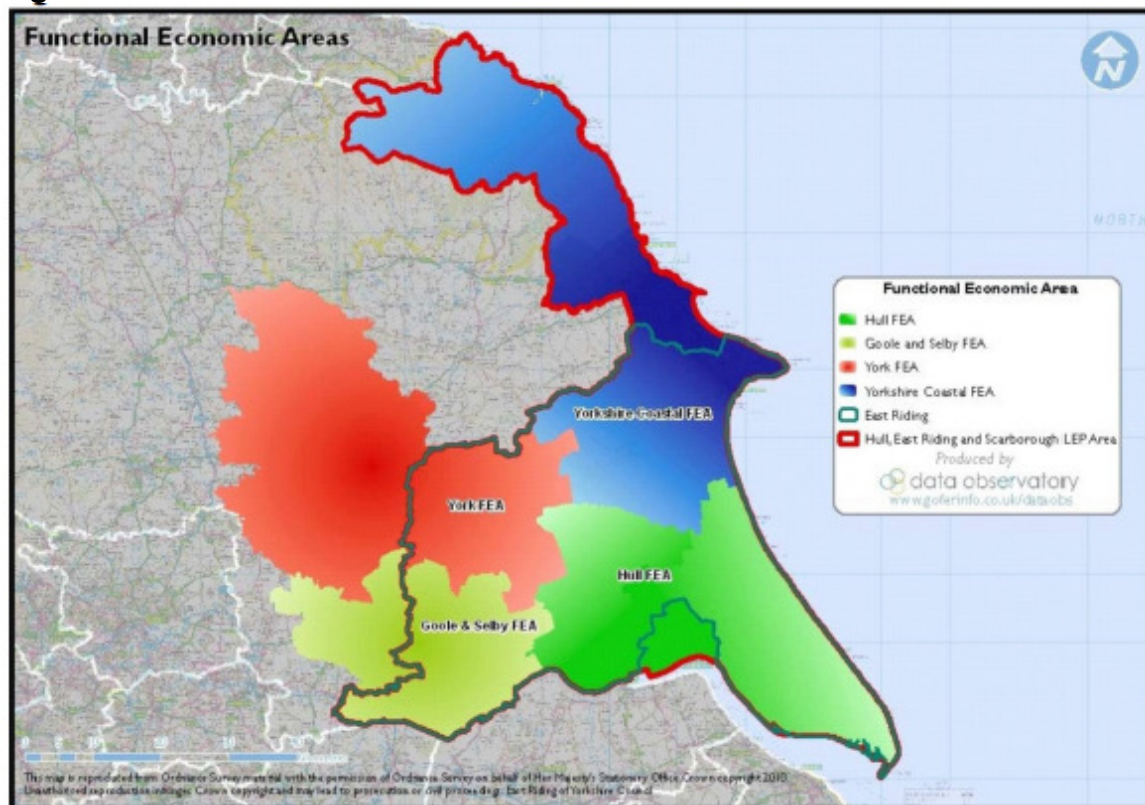
4.12 Of particular note in this wider area is that it includes most of Selby District to the south and parts of Ryedale and East Riding to the east of the city. This reflects the York Functional Economic Area (FEMA), shown in Figure 4.6<sup>7</sup>.

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<sup>7</sup> as contained in the East Riding Proposed Submission Local Plan, Duty to Cooperate: Background Paper, April 2014.



**Figure 4.6 Functional Economic Areas**

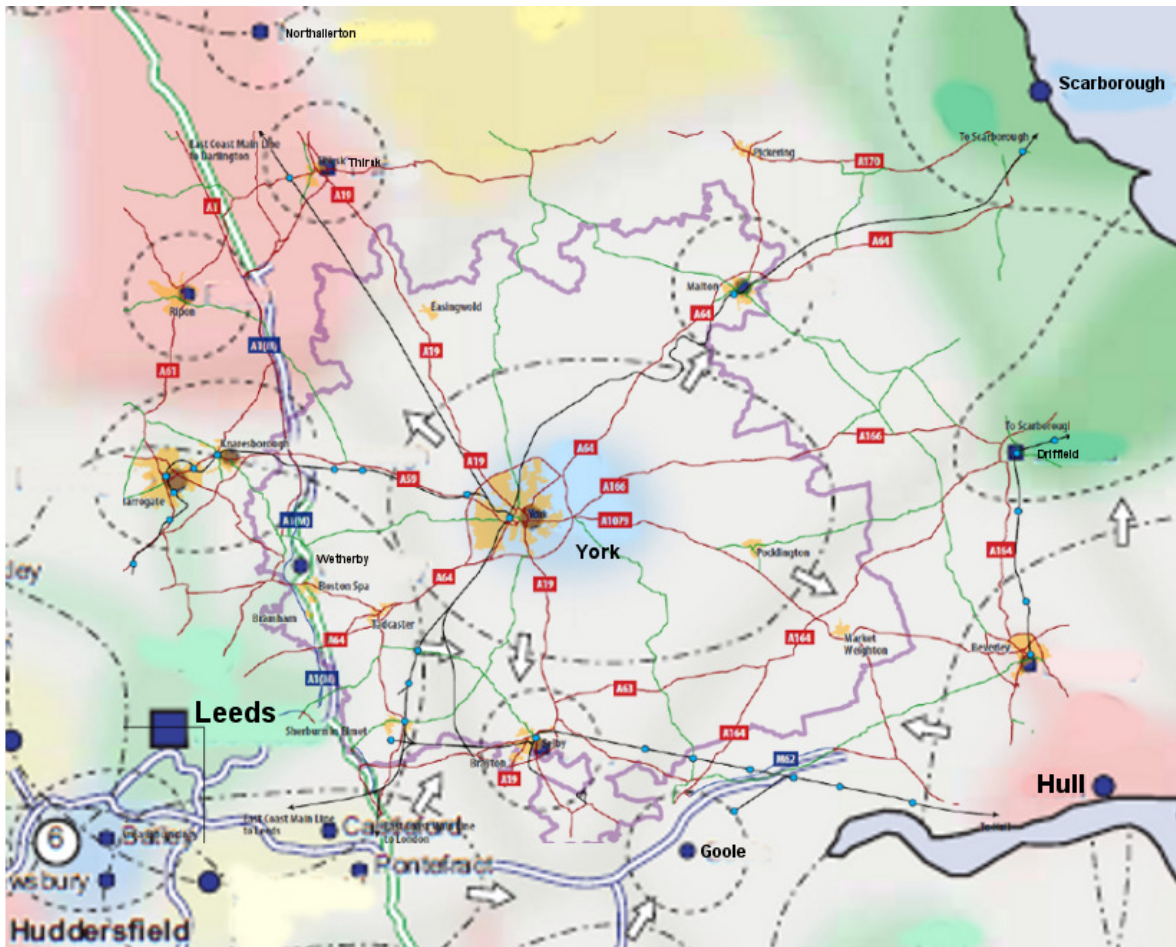


4.13 The urban area of York’s influence on housing markets extends further than that of its influence on markets for business space and employment land. York’s influence on housing markets overlaps with the influence of other areas, including Leeds, Harrogate, the A1 corridor, Hull and Beverley. The extent of the housing market in relation to the York Sub Area boundary is shown in Figure 4.7. In reality the Sub Area has “fuzzy” boundaries as different functional relationships, such as housing markets, commuting patterns, markets for employment land and so on, operate at different geographic levels. However, in defining the extent of the area for the purposes of cooperation under the Duty it has been assumed these have a common geographic and thematic extent, being those areas within and adjacent to the York Sub Area

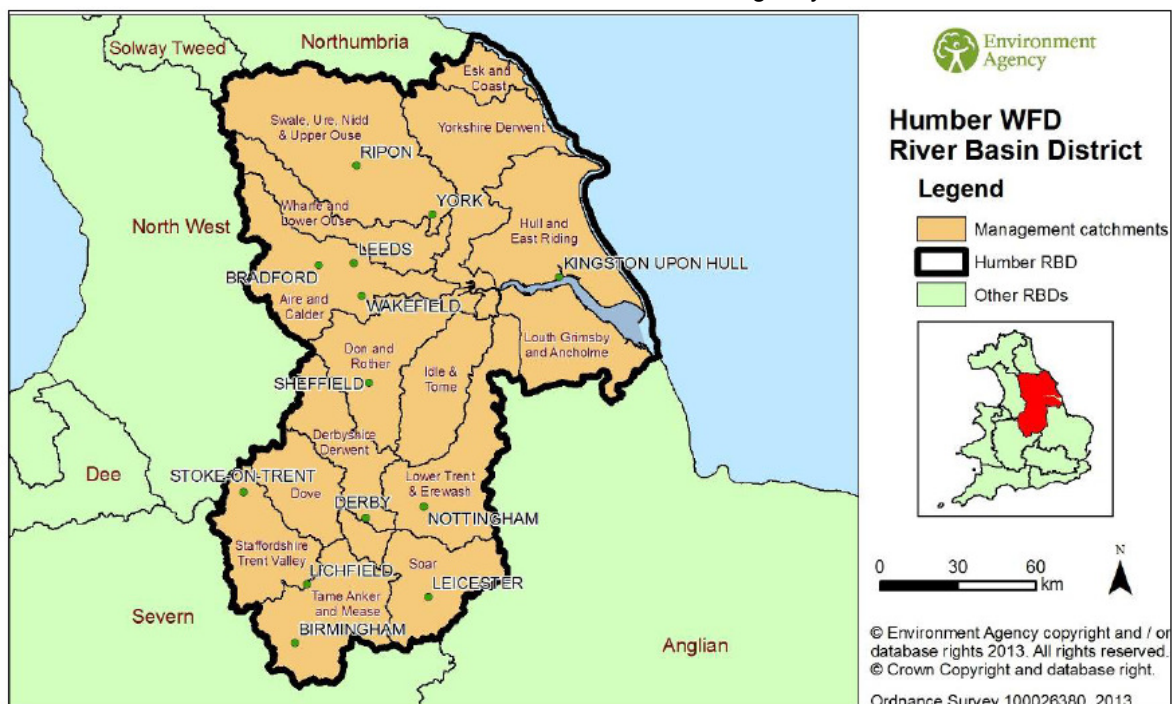
4.14 York also sits at the confluence of the River Ouse and the River Foss. The River Derwent forms part of the eastern boundary of the authority area. These and other watercourses are within the River Humber Basin District Catchments. Therefore, the thematic coverage for watercourses for cooperation duty encompasses the Swale, Ure, Nidd & Upper Ouse Catchment and the Yorkshire Derwent Catchment, as shown in

Figure 4.8.

**Figure 4.7 Geographic and thematic (housing and travel) coverage of the area for cooperation under the Duty**



**Figure 4.8 Map of the Humber River Basin District Catchments**  
 Extracted from Humber River Basin District: Challenges Summary of significant water management issues, A consultation and choices consultation, Environment Agency, 2013



### **Eliminating non-strategic matters from the Duty**

**Healthcare** – NHS Vale of York Clinical Commissioning Group (CCG); Tees, Esk and Wear Valleys NHS Foundation Trust, and York Teaching Hospital NHS Foundation Trust

- 4.15 The cumulative impact of ongoing residential development may result in the need for further local health services, depending on its location. The healthcare service generally responds to spatial patterns of growth, and local services are improved and expanded in line with new development, sometimes through developer contributions. Information provided by the CCG (formerly the Primary Care Trust) and Hospitals Trusts confirms that risks to providing healthcare services to meet needs directly arising as a result of new development is low. However, it is recognised that recent changes to the health service, may have spatial implications although these are unknown at this stage.
- 4.16 The York Teaching Hospital NHS Foundation Trust's future strategy is to increase the number of services that are provided in the community. This will result in a reduction in the number of beds at the hospital as the Trust transfers more services to the community. The proposed increase in population as a result of new development is being taken into account in its plans and will result in bed spaces being reduced at a lower rate than previously planned whilst continuing with its strategy of developing more community based services.

**Emergency services** - North Yorkshire Fire & Rescue Service, North Yorkshire Police and Yorkshire Ambulance Services NHS Trust

- 4.17 No potential cross boundary issues, risks or contingencies have been identified at this stage.

**Gas** - Northern Gas Networks

- 4.18 Information on provision across the region shows that in general terms, gas supply is not constrained as the region benefits from a number of connections to the national high pressure transmission network, as well as having an extensive and robust core network around the main urban areas. However, many rural areas have no gas supply. Supply and connection are currently unconstrained in York, with Northern Gas Networks indicating that its systems are robust enough to be able to supply future development in York.

**Electricity supply and transmission** - Northern Powergrid

- 4.19 Northern Powergrid, which is a wholly owned subsidiary of Berkshire Hathaway Energy, runs the major electricity distribution network that provides power to customers in the Northeast, Yorkshire and northern Lincolnshire, covering an area of 25,000 square kilometres. Northern Powergrid has not stated that there any strategic cross-boundary issues, but has identified
- at the strategic level - a few areas in the City of York that may require some EHV (33kV) reinforcement depending on the nature of the developments (Strategic Sites)

- at the detailed level – potentially, a need to reinforce some of the 11kV distribution network systems.

#### **Telecommunications - Openreach**

- 4.20 Telecommunications and broadband coverage in the urban areas is generally good and Openreach has previously advised that network capacity will not generally be an issue that shapes or constrains the spatial options for development. Developments in technology (fibre optic cables), together with extensive ongoing investment in the core of the main networks mean that the capacity and capability of the networks continues to improve in response to demand.
- 4.21 Overall the availability of the telecommunications network and network capacity are not seen as major constraining factors to future homes growth, or growth in businesses, except in relation to accommodating growth in isolated areas. Given the location of proposed growth it is unlikely that there will be any strategic telecoms infrastructure issues in York.

#### **Water - Yorkshire Water**

- 4.22 It is reasonably certain that appropriate water infrastructure can be provided to support development in the Plan. The main issue is with the capacity of Waste Water Treatment Works (WWTW). The scale and general location of growth proposed in the Plan can be accommodated either in existing WWTW capacity or through planned or future improvements for sites phased later in the plan period.

#### **Community facilities**

- 4.23 Whilst the Council will have a role in identifying community facilities needs, in many cases they will be funded and implemented by a range of other organisations. Working with partners will be essential to ensure that facilities come forward to meet the needs of new development. However, this is not expected to be an aspect that will be of a strategic nature.

#### **Aerodrome Safeguarding - Civil Aviation Authority**

- 4.24 The aim of the process is to provide notification of potential developments or construction within a specified area and to allow assessment of the potential impact. **On 10 February 2003 the Civil Aviation Authority (CAA) ceased to be the contact point for safeguarding consultations and this responsibility transferred to aerodrome licence holders. Currently there are no licensed aerodromes in York, so the CAA has not been engaged with under the Duty**

#### **Identifying the strategic matters that require cooperation**

Formal groups for considering matters under the Duty

- 4.25 The formal groupings within the Leeds City Region and the Local Government North Yorkshire and York area at which issues relating to the Duty are raised are, primarily:
- The Leeds City Region Planning Portfolios Board

- The Leeds City Region Heads of Planning Group
- The Leeds City Region Strategic Planning (Duty to Cooperate) Group;
- North Yorkshire and York Spatial Planning and Transport Board
- North Yorkshire and York Spatial Planning and Transport Technical Officer Group

4.26 Figure 4.9 shows graphical representation of formal groupings listed above. These have evolved from the structures that have been put in place since before 2004, as shown in Table 4.1. The various organisations and groupings contained in Figure 4.9 and Table 4.1 have to a greater or lesser degree either had an input to the higher level plans that influenced the City of York Core Strategy (as the antecedent to the City of York Local Plan), or directly influenced or informed the Core Strategy.

4.27 Under the arrangement shown in Figure 4.9, the North Yorkshire Spatial Planning and Transport Technical Officer Group (TOG), up until December 2015 was the main officer group to provide advice and support to the North Yorkshire and York Spatial Planning and Transport Board (the Board) in:

- Co-ordinating and developing the sub-region's planning and transport responses and input in terms of emerging national legislation and national, regional and sub-regional strategies, plans and programs.
- Improving partnership working between authorities and with other 'prescribed bodies' on spatial planning and transport related matters, particularly those of a strategic nature that are 'larger than a single authority area'.

4.28 The TOG also (similar to the Leeds City Region Strategic Planning (Duty to Cooperate) Group) shared information and approaches on spatial planning issues and to work collaboratively to seek to ensure consistency of planning related and transport related strategies and policies across the sub-region, particularly in relation to demonstrating compliance with the provisions and two tests of soundness under the 'Duty to Cooperate'.

4.29 From January 2016 onwards, under a more streamlined structure for the York, North Yorkshire and East Riding LEP area the Heads of Planning became main supporting officer group for the Board with the revised reporting sequencing to the Spatial Planning and Transport Board as follows:

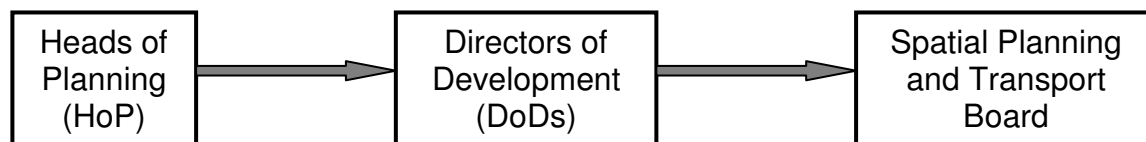
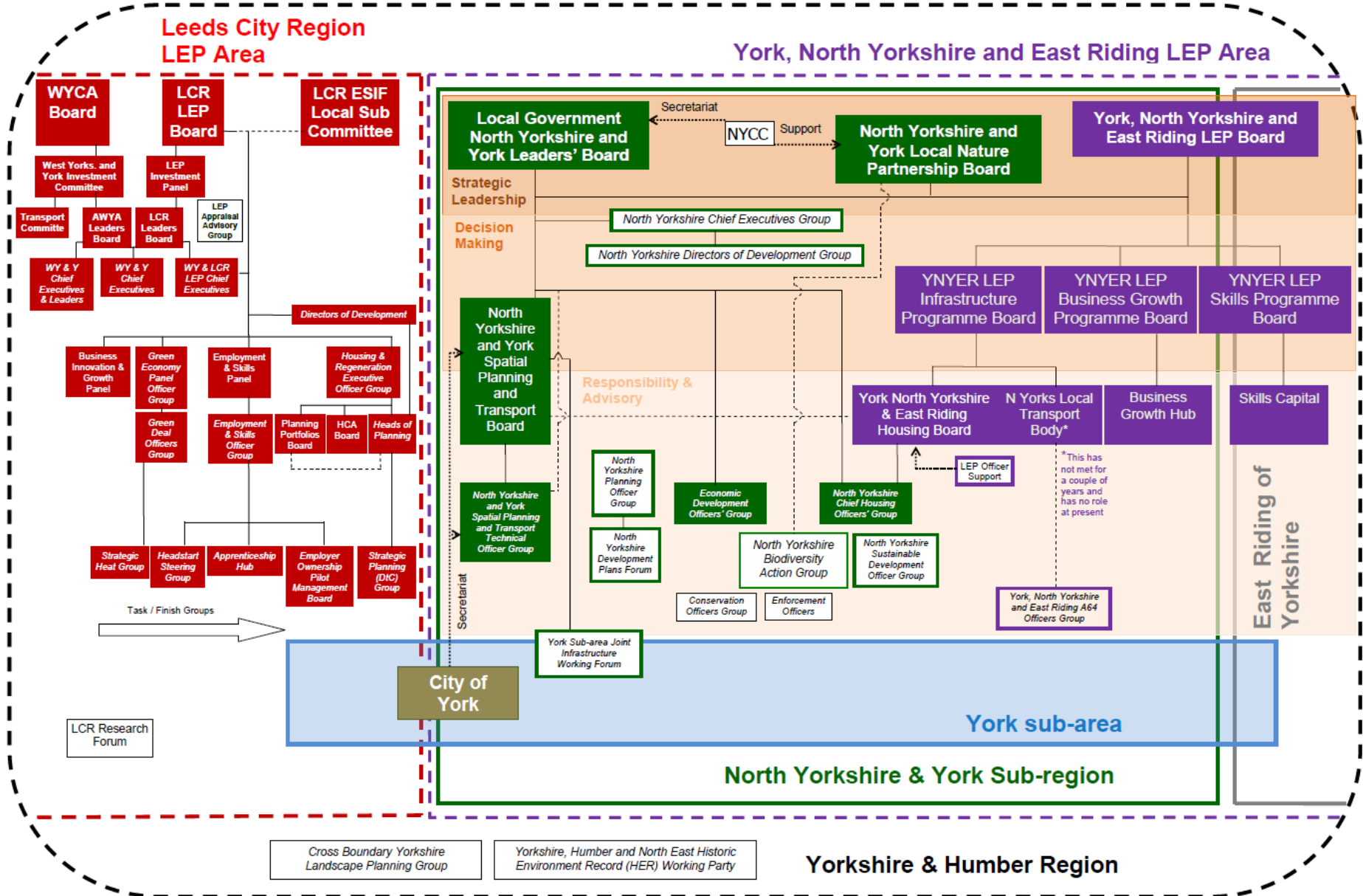




Figure 4.9 Yorkshire and the Humber partnership / governance arrangements (as at December 2015)



<b>Table 4.1 Changing methods of co-operation through the Core Strategy plan-making process</b>		
<b>Dates</b>	<b>Vehicle for Co-operation</b>	<b>Role of City of York Council</b>
Pre-2004	North Yorkshire and York Structure Plan	Co-production of document with North Yorkshire County Council, Local Authorities and National Park Authorities
Pre-2004	North Yorkshire Local Plan Forum	Active Member
2003-2012	Yorkshire and Humber Plan (Regional Spatial Strategy to 2026) <ul style="list-style-type: none"> <li>• Set a core approach and targets for local authorities.</li> <li>• Identified sub area and cross-boundary issues.</li> </ul>	Active Member of the North Yorkshire and York Technical Forum which established a sub-regional consensus on strategic cross boundary issues and collectively lobbied the Regional Assembly
2004-present	Leeds City Region Partnership: <ul style="list-style-type: none"> <li>• Agreed a Concordat which outlined a shared vision and the principles of how local authorities would work together</li> <li>• Agreed the City Region Development Programme which developed the Partnership's vision into actions</li> <li>• Leaders board set up to take strategic decisions</li> </ul>	Active Member
2004-present	North Yorkshire Development Plan Forum	Active Member
2010-2011	North Yorkshire and York Sub-Regional Strategy: <ul style="list-style-type: none"> <li>• Maintained core approach and sub area approach of RSS.</li> </ul>	Secretariat of North Yorkshire and York Spatial Planning Board and technical officer group
2010-2011	Leeds City Region Partnership: <ul style="list-style-type: none"> <li>• Interim Planning Strategy which retains core approach of RSS.</li> </ul>	Active Member
2011 – present	Leeds City Region Local Enterprise Partnership	Board Member
2011 –	York, North Yorkshire and East Riding Local Enterprise	Board Member

<b>Table 4.1 Changing methods of co-operation through the Core Strategy plan-making process</b>		
<b>Dates</b>	<b>Vehicle for Co-operation</b>	<b>Role of City of York Council</b>
present	Partnership	
2011 – present	York Sub Area Joint Infrastructure Working Forum	After initiating the setting up of this group, City of York Council is now an active member. This group is now a task / finish group for the North Yorkshire and York Spatial Planning and Transport Board
2012 - Present	<p><b>Duty to Co-operate</b></p> <ul style="list-style-type: none"> <li>• Leeds City Region (LCR) Leaders Board <ul style="list-style-type: none"> <li>○ Statement of Cooperation for Local Planning</li> </ul> </li> <li>• LCR Planning Portfolios Board</li> <li>• LCR Heads of Planning Group</li> <li>• LCR Strategic Planning (Duty to Cooperate) Group</li> <li>• LCR Connectivity Partnership</li> <li>• LCR task / finish groups (e.g. Infrastructure Group)</li> <li>• North Yorkshire and York (NY&amp;Y) Spatial Planning and Transport Board (SP&amp;T Board)</li> <li>• (NY&amp;Y) Spatial Planning and Transport Technical Officer Group<sup>1</sup></li> </ul>	<p>Active Member (at Elected Member level)</p> <p>Active Member (at Elected Member level)</p> <p>Active Member (at Officer Level)</p> <p>Active Member (at Officer Level)</p> <p>Active Member (at Officer Level)</p> <p>Active Member (at Officer Level)</p> <p>Active Member (at Officer Level)</p> <p>Active Member and Chair (at Elected Member level) and Secretariat</p> <p>Active Member (at Officer Level) and Secretariat</p>
2016 - Present	<ul style="list-style-type: none"> <li>• York North Yorkshire and East Riding (YNYER) Heads of Planning (HoP)</li> <li>• YNYER Directors of Development (DoDs)</li> </ul>	<p>Active Member (at Officer Level)</p> <p>Active Member (at Officer Level)</p>

1 This group ceased reporting to the NY&Y Spatial Planning and Transport Board (in 2016 when responsibilities for this passed to the YNYER HoP (and, if necessary, YNYER DoDs) and the reporting structure to the SP&T Board changed to HoP→DoDs→SP&T Board



## **Leeds City Region Statement of Cooperation for Local Planning**

- 4.30 This Statement, referred to in Table 4.1 above and contained at Annex 1, was prepared by the Leeds City Region Portfolios Board as a response to the need for greater collaboration between authorities across the city region to ensure better compliance with the Duty to co-operate. The purpose of the Statement is twofold:
- To set out processes and practical steps to be followed going forward, that will strengthen the Leeds City Region authorities' approach to collaborative working;
  - To outline the current collaborative work on strategic, cross-boundary issues that is ongoing within the Leeds City Region.
- 4.31 The Statement sets out the legislation and guidance relating to the Duty to co-operate. It outlines the Leeds City Region Duty to co-operate process including best practice examples. The Statement also provides details of the current governance structures in place within the Leeds City Region to support collaborative working; it includes details of the Leeds City Region strategic context and the current agreed priorities. It is proposed that this Statement be revised annually.

## **The case for not producing joint local plans**

- 4.32 As previously stated in paragraph 3.02, if considered appropriate, engagement between local authorities can include, taking a joint approach for undertaking the activities for preparing development plan documents, or the preparation of other local development documents. The North Yorkshire and York (NY&Y) Spatial Planning and Transport Board, referred to in Table 4.2 above, is a Member decision-making group within the Local Government North Yorkshire and York structure (see also Figure 4.9). In 2012 the Board changed its terms of reference for:
- The Chairman of the York, North Yorkshire and East Riding Local Enterprise Partnership to be invited to become a member
  - A member representative from East Riding of Yorkshire Council, Hull and Humber Ports City Region, Leeds City Region, Tees Valley, Lancashire and Durham to be invited to be non-voting members of the Board
- 4.33 At its meeting on 10 September 2015, the Board considered a paper, prepared by City of York Council, entitled 'The distribution of the provision of housing in the York Housing Market Area.' This paper:
- Stated there is evidence which shows that the housing market area extends into adjoining local authority areas.
  - Expressed the City of York administration's concerns about the impact of meeting York's objectively assessed housing need (OAHN) on other policies in the NPPF including protecting the green belt. Adding that if the impact is such that it significantly and demonstrably outweighs the benefits of meeting the OANH then reasonable alternatives will need to be pursued, including meeting some of the OANH outside the York Local Plan area.
  - Referred to Governments expectations of local authorities under the Duty set out in NPPF that authorities should work collaboratively to ensure proper coordination between authorities on strategic priorities and that in York's case the shared housing market could be regarded as such a strategic priority.

- Presented three possible approaches, based on experience elsewhere:
  - Preparing a joint Plan (Lincoln is an example of this); or
  - aligning neighbouring Plans in both strategy and plan making timetable (Nottingham is an example of this); or
  - agreeing an informal joint strategy which would then be incorporated into individual Plans (the approach taken in Cambridge and Peterborough).

4.34 The general consensus of the Board Members was that given the different stages of progress for each of the respective authorities' local plans **it would not be advisable to take such a sub-regional approach for the current round of Local Plans**. However, the Board agreed in principle to the next round of local plans a more sub-regional in approach, if sufficiently evidenced.

4.35 For this reason **no joint local plans are being prepared and the City of York Plan seeks to meet its objectively assessed needs for development wholly within its unitary authority area**.

#### **The City of York Local Plan Duty to co-operate Matrix**

4.36 The main vehicle for identifying and debating cross boundary issues under the Duty, and establishing how they may be resolved (either through formal or informal routes) is the respective authorities' Duty to co-operate matrices. These are generally circulated to the officer level groups for subsequent discussion and comment. The City of York's Duty to co-operate Matrix is contained at **Error! Reference source not found**. Annex 2. and the matters identified therein requiring cooperation are summarised in Table 4.2. The format of the Duty to co-operate Matrix at Annex 2 is a modification of the Leeds City Region Duty to co-operate Table Template (See Annex 1, Appendix C). The modified Matrix includes a 'Where & when issue discussed' column and a 'Resulting Positive outcome' column (following advice received from PAS) with the latter referring to the positive outcome for the strategic issue as a whole rather than each specific discussion.

#### **Identifying issues for inclusion in the Duty to co-operate Matrix**

##### **Issues identified through the production of the LDF core strategy as predecessor to the Local Plan**

4.37 Issues raised by local authorities, other local government organisations, Government Departments and other agencies in relation to the LDF Core Strategy (as the antecedent to the Local Plan) are summarised in Table 4.3. This table has been compiled from representations to the LDF Core Strategy Preferred Options and the LDF Core Strategy Submission (Publication) unless stated otherwise.

<b>Table 4.2 Strategic matters requiring cooperation from City of York's and other authorities' Duty to co-operate matrices</b>		
<b>Strategic Issue</b>	<b>Impact</b>	<b>Areas Affected</b>
Scale of housing growth (minimum of 867 dwellings per annum (dpa) + 56 dpa for shortfall from 2012 to start of plan, over the plan period)	<ul style="list-style-type: none"> <li>Higher levels of housing in York are coordinated with those of other authorities to meet overall requirements of the Objectively Assessed need within the SHMA and York Sub-area.</li> <li>Puts pressure on surrounding District's to provide more housing and puts pressure on house prices on their house prices therein if needs are not fully met in York</li> </ul>	<ul style="list-style-type: none"> <li>SHMA geography</li> <li>York Sub-area comprising the City of York and parts of the following:               <ul style="list-style-type: none"> <li>Harrogate Borough</li> <li>Ryedale District</li> <li>East Riding of Yorkshire</li> <li>Selby District</li> <li>Hambleton District</li> <li>NYMNP</li> </ul> </li> </ul>
Scale of employment growth (650 new jobs per annum over the plan period)	<ul style="list-style-type: none"> <li>Potential to increase inward commuting from adjacent authorities.</li> </ul>	<ul style="list-style-type: none"> <li>Leeds City Region (part)</li> <li>North Yorkshire and York Sub-Region (part)</li> <li>York Sub-area comprising the City of York and parts of the following:               <ul style="list-style-type: none"> <li>Harrogate Borough</li> <li>Ryedale District</li> <li>East Riding of Yorkshire</li> <li>Selby District</li> <li>Hambleton District</li> </ul> </li> </ul>
Retail growth	<ul style="list-style-type: none"> <li>Draw of York's city centre and its other retail areas extending the retail catchment beyond its local authority boundaries</li> <li>Potential to increase inward retail trips from adjacent authorities</li> <li>Potential negative impact upon vitality and health of the centres of surrounding settlements.</li> </ul>	<ul style="list-style-type: none"> <li>North Yorkshire and York Sub-Region</li> <li>York Sub-area comprising the City of York and parts of the following:               <ul style="list-style-type: none"> <li>Harrogate Borough</li> <li>Ryedale District</li> <li>East Riding of Yorkshire</li> <li>Selby District</li> <li>Hambleton District</li> <li>Scarborough Borough</li> </ul> </li> </ul>

<b>Table 4.2 Strategic matters requiring cooperation from City of York's and other authorities' Duty to co-operate matrices</b>		
<b>Strategic Issue</b>	<b>Impact</b>	<b>Areas Affected</b>
Leisure	<ul style="list-style-type: none"> <li>• International, National and Regional draw of York as a leisure (tourism) destination</li> <li>• York as the 'Gateway to Yorkshire'</li> <li>• Potential to increase inward leisure trips</li> <li>• Wider benefits to surrounding areas with linked leisure trips, tourist accommodation offer in neighbouring areas and need for wider tourism promotion / coordination</li> </ul>	<ul style="list-style-type: none"> <li>• Leeds City Region</li> <li>• North Yorkshire and York Sub-Region</li> <li>• York Sub-area</li> </ul>
Physical infrastructure - Transport	<ul style="list-style-type: none"> <li>• Increased traffic on the Strategic Road Network (principally the A64)</li> <li>• Increased traffic on Radial routes               <ul style="list-style-type: none"> <li>○ A19 N&amp;S;</li> <li>○ A59</li> <li>○ B1224 etc.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• A64 between its junction with the A1(M) and Scarborough</li> <li>• Leeds City Region</li> <li>• North Yorkshire and York Sub-Region</li> <li>• York Sub-area               <ul style="list-style-type: none"> <li>○ <i>Harrogate</i></li> <li>○ <i>Selby</i></li> <li>○ <i>East Riding</i></li> <li>○ <i>Scarborough</i></li> <li>○ <i>Ryedale</i></li> <li>○ <i>Hambleton</i></li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Increased congestion in and around York</li> </ul>	
	<ul style="list-style-type: none"> <li>• Increased traffic on the locally strategic road network (principally the A1237 York Outer Ring Road (northern section))</li> </ul>	<ul style="list-style-type: none"> <li>• City of York</li> <li>• Harrogate Borough</li> <li>• Leeds City</li> <li>• North Yorkshire and York Sub-Region</li> </ul>
	<ul style="list-style-type: none"> <li>• Connectivity between York, Harrogate and Leeds</li> <li>• Connectivity across wider NY Sub-Region including Selby, Ryedale, Hambleton, Harrogate, Scarborough etc.</li> </ul>	

<b>Table 4.2 Strategic matters requiring cooperation from City of York's and other authorities' Duty to co-operate matrices</b>		
<b>Strategic Issue</b>	<b>Impact</b>	<b>Areas Affected</b>
	<ul style="list-style-type: none"> <li>• Strategic rail including               <ul style="list-style-type: none"> <li>○ Haxby station</li> <li>○ York Station (+HS2)</li> <li>○ York-Harrogate-Leeds line</li> <li>○ Access to Leeds Bradford Airport</li> <li>○ Rail devolution and re-franchising</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• National (to be discussed with the Office of Rail Regulation)</li> </ul>
Physical infrastructure – Waste and Minerals	<ul style="list-style-type: none"> <li>• Sustainable Waste Management</li> </ul>	<ul style="list-style-type: none"> <li>• North Yorkshire and York Sub-Region               <ul style="list-style-type: none"> <li>○ York</li> <li>○ North Yorkshire</li> <li>○ North York Moors</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Mineral Extraction</li> </ul>	
Physical Infrastructure - Energy	<ul style="list-style-type: none"> <li>• Proliferation or uncoordinated provision of renewable energy facilities</li> <li>• Cumulative impact of renewable energy facilities within and across City's administrative area.</li> <li>• Amenity impacts upon neighbouring communities beyond the City boundaries (proposed policy response is).</li> </ul>	<ul style="list-style-type: none"> <li>• North Yorkshire and York Sub-Region</li> <li>• York Sub-area, particularly at local authority borders</li> </ul>
Gypsies, Travellers and Showpeople	<ul style="list-style-type: none"> <li>• Uncoordinated provision of suitable sites leading to over-provision or under provision at the Sub-regional / Sub-area level</li> <li>• Impact would extend to surrounding Districts if York don't meet its own needs</li> </ul>	<ul style="list-style-type: none"> <li>• North Yorkshire and York Sub-Region</li> <li>• York Sub-area, particularly at local authority borders</li> </ul>
Social infrastructure – Education Establishments	<ul style="list-style-type: none"> <li>• Travel to education establishments outside York and travel into York's education establishments from outside York</li> </ul>	<ul style="list-style-type: none"> <li>• York Sub-area, particularly the following:               <ul style="list-style-type: none"> <li>○ Harrogate Borough</li> <li>○ Ryedale District</li> <li>○ East Riding of Yorkshire</li> <li>○ Selby District</li> <li>○ Hambleton District</li> </ul> </li> </ul>

<b>Table 4.2 Strategic matters requiring cooperation from City of York's and other authorities' Duty to co-operate matrices</b>		
<b>Strategic Issue</b>	<b>Impact</b>	<b>Areas Affected</b>
Natural and Historic Environment	<ul style="list-style-type: none"> <li>Flood Risk</li> </ul>	<ul style="list-style-type: none"> <li>City of York</li> <li>North Yorkshire and York Sub-Region</li> <li>York sub-area</li> </ul>
	<ul style="list-style-type: none"> <li>Green Infrastructure Corridors</li> </ul>	<ul style="list-style-type: none"> <li>City of York</li> <li>North Yorkshire and York Sub-Region</li> <li>York sub-area</li> <li>Local Nature Partnership area</li> </ul>
	<ul style="list-style-type: none"> <li>Water Environment</li> </ul>	<ul style="list-style-type: none"> <li>Humber River Basin Districts:               <ul style="list-style-type: none"> <li>Swale, Ure, Nidd and upper Ouse</li> <li>Wharfe and Lower Ouse</li> <li>Derwent (Humber)</li> <li>Derwent SAC</li> <li>Sherwood Acquirer</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>Biodiversity</li> </ul>	
	<ul style="list-style-type: none"> <li>Visual impact on Landscape</li> </ul>	<ul style="list-style-type: none"> <li>City of York</li> <li>York sub-area, particularly the following:               <ul style="list-style-type: none"> <li>Harrogate Borough</li> <li>Ryedale District</li> <li>East Riding of Yorkshire</li> <li>Selby District</li> <li>Hambleton District</li> </ul> </li> <li>Local Nature Partnership area</li> </ul>
Climate Change	<ul style="list-style-type: none"> <li>Any wind turbine applications near the York boundaries could have a visual impact on neighbouring authorities.</li> </ul>	<ul style="list-style-type: none"> <li>Harrogate Borough</li> <li>Ryedale District</li> <li>East Riding of Yorkshire</li> <li>Selby District</li> <li>Hambleton District</li> </ul>

**Note** More detail in relation to evidence, actions and resulting positive outcomes are contained in the Duty to co-operate matrix at **Error! Reference source not found.**

<b>Table 4.3 Summary of issues raised in relation to the LDF Core Strategy (as the antecedent to the Local Plan)</b>		
Issue	Issue raised by	Stage at which the issue was raised
<p>Vision</p> <ul style="list-style-type: none"> <li>Support particularly intention to strike balance between physical growth and environmental sustainability and ensure that environmental consequences are adequately understood and managed</li> </ul>	English Heritage	Submission (Publication)
<p>Spatial Strategy</p> <ul style="list-style-type: none"> <li>expand context consider relationship between York and settlements within East Riding of Yorkshire</li> <li>Support requirement that sites or future areas for development will need to ensure they will safeguard special historic character and setting.</li> <li>Concerned about flexibility of planning for York to ensure that long term development needs can be met, without adversely impacting on neighbouring parts of Hambleton District lying outside Green Belt. The identified Areas of Search only appear to provide for approximately a 2.5 year over supply of housing</li> <li>industrial and distribution related employment within York considered to have a significant impact on SRN</li> <li>Housing and employment sites would almost certainly require new on and off site sewers and water mains. Sites allocated would need to be phased to coordinate with Yorkshire Water's infrastructure provision</li> </ul>	<p>East Riding of Yorkshire Council</p> <p>English Heritage</p> <p>Hambleton District Council</p> <p>Highways Agency</p> <p>Yorkshire Water</p>	<p>Preferred options</p> <p>Submission (Publication)</p> <p>Submission (publication)</p> <p>Preferred Options</p> <p>Preferred Options</p>

<b>Table 4.3 Summary of issues raised in relation to the LDF Core Strategy (as the antecedent to the Local Plan)</b>		
Issue	Issue raised by	Stage at which the issue was raised
<p>Housing Growth, Distribution, Density Mix</p> <ul style="list-style-type: none"> <li>The proposed housing growth of 800 dwellings per annum (not meeting RSS and using 2003 projections) against up to 1,000 jobs is a concern as this could put pressure on East Riding. Important to clarify that housing and employment growth in city are balanced and seek to reduce (or at least not exacerbate) level of commuting from neighbouring authorities.</li> <li>RSS is being reviewed - likely that housing growth figures for the region will need to rise.</li> <li>York North West, Hungate, Nestle, Germany Beck, Derwenthorpe, Terry's, Monks Cross and Metcalfe Lane are considered to have a significant impact on SRN.</li> <li>Concerned with the scale of growth proposed and 'unmet demand' because housing requirement is below RSS requirement, it was argued that this will cause displacement and neighbouring authorities will have to meet this unmet demand.</li> <li>York being over cautious leading to under provision in plan period this will lead to pressure on Selby.</li> </ul>	<p>East Riding of Yorkshire Council</p> <p>North Yorkshire County Council / Local Government Yorkshire &amp; the Humber</p> <p>Highways Agency</p> <p>North Yorkshire County Council</p> <p>Selby District Council</p>	<p>Submission (Publication)</p> <p>Preferred Options</p> <p>Preferred Option</p> <p>Submission (Publication)</p> <p>Submission (Publication)</p>
<p>Transport</p> <ul style="list-style-type: none"> <li>The Beverly to York railway line has been taken out - Would have liked to have seen reference to it being a long term aspirations in supporting text. If infrastructure improvements are considered to be critical to delivery of LDF, and do not have a realistic funding source, document will be considered unsound.</li> <li>Will only consider improving SRN to meet traffic generated by new development as a last resort</li> <li>Does not address issue of long distance commuting into York from neighbouring authorities and the implications of this on the strategic road</li> </ul>	<p>East Riding of Yorkshire Council</p> <p>Highways Agency</p> <p>Highways Agency</p>	<p>Submission (Publication)</p> <p>Preferred Options</p> <p>Submission (Publication)</p>



<b>Table 4.3 Summary of issues raised in relation to the LDF Core Strategy (as the antecedent to the Local Plan)</b>		
Issue	Issue raised by	Stage at which the issue was raised
<p>network. None of the measures outlined would do anything to significantly relieve capacity issues on the A64 created by future development.</p> <ul style="list-style-type: none"> <li>• If proposal [for tram-train] proceeds in isolation wish to ensure that impact of development on operation of Harrogate Line would not reduce level of service nor reduce ability to undertake improvements to service frequency or infrastructure on this line.</li> <li>• Some concern about appropriateness of future development in vicinity of ring road that relies on these improvements taking place, or that relies on rail improvements, unless suitable funding regimes are identified</li> </ul>	<p>Harrogate District Council</p> <p>Yorkshire Forward</p>	<p>Preferred Options</p> <p>Preferred Options</p>

4.38 In addition to the above, the Regional Spatial Strategy (RSS) for Yorkshire and the Humber (adopted May 2008) provided the strategic context for and became a part of the development plan for each local authority in the Yorkshire and Humber Region, which included the City of York Core Strategy. However, as part of the Coalition Government's planning reforms the Regional Spatial Strategy was (with the exception of York Green Belt policies) removed from being part of the statutory development plan. Therefore, for completeness the former strategic approach to co-operation for the RSS is contained at **Error! Reference source not found.**Annex 3 and the RSS York Sub-area policies are contained at Annex 4**Error! Reference source not found.**

#### **Issues identified in the transition from a LDF core Strategy to a Local Plan**

4.39 The issues raised by prescribed bodies through the Local Plan Preferred Options (2013), the Local Plan Further Sites Consultation (2014) and the Preferred Sites Consultation (2016), relevant to the Duty and resultant outcomes, are summarised in Table 4.4.

4.40 In addition to the more formal approaches for cooperating with prescribed bodies and other relevant organisations, City of York Council has engaged on an on-going basis through an extensive series of informal (but recorded) meetings with such bodies and organisations, on a largely one-to-one basis, in relation to the Duty for preparing the City of York Local Plan. Table 4.5 is a summary (index) of this ongoing engagement and an example 'Record of Engagement' is contained at Annex 5.

<b>Table 4.4 Summary of Prescribed Body (and other relevant body) Responses to City of York Local Plan consultation documents (up to Local Plan Pre Publication Draft (Regulation 18 Consultation), September 2017) pertaining to strategic cross boundary issues</b>		
Body	Representation	Outcome
<b>Preferred Options (2013)</b>		
East Riding of Yorkshire Council (ERC)	<ul style="list-style-type: none"> <li>• Committed to working with City of York Council on cross boundary issues as the respective local plans are progressed and seek the opportunity for joint document or Memorandum of Understanding to address the key planning issues between the authorities</li> <li>• Support Policy SS1- the Local Plan will ensure the housing needs of York are met within the York local authority area</li> <li>• The approach [in Policy SS2 - providing sufficient land to support sustainable economic growth] will help to support sustainable patterns of development in the York Sub Area and reduce unnecessary development pressure beyond the green belt boundary. Agrees that it is important for economic and housing growth to be linked</li> <li>• With regard to Site ST15               <ul style="list-style-type: none"> <li>○ Queries the scale of development proposed, considering the additional safeguarded land (SF3).</li> <li>○ Suggests that CYC may need to re-consider:                   <ul style="list-style-type: none"> <li>▪ the amount of housing that could come forward on site ST15 over the plan period</li> <li>▪ whether the plan is flexible enough to accommodate a shortfall in housing supply if the high rate of development is not met</li> </ul> </li> <li>○ No employment allocations are included, which could result in an unsustainable pattern of development.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Continued liaison with ERC as local plans progressed</li> <li>• CYC and ERC signed-up to the Memorandum of Understanding for A64 Trunk Road York - Scarborough Improvement Strategy</li> </ul>

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<b>Body</b>	<b>Representation</b>	<b>Outcome</b>
	<ul style="list-style-type: none"> <li>○ likely to have impact on the A1079 / A166 / A64 Grimston Bar Interchange (as will development of ST4, ST6, ST7 and ST8)</li> <li>○ More clarity needed on               <ul style="list-style-type: none"> <li>▪ how it will be accessed</li> <li>▪ the consideration of the impact of the large area for future development adjacent to the new settlement.</li> </ul> </li> <li>○ Work to be taken forward within the context of the Memorandum of Understanding for the A64 in partnership with Highways Agency and other relevant planning / highways authorities.</li> <li>● Support Policy GI2 - consistent with the draft East Riding Local Plan.</li> <li>● Policy CC1 - it will be essential that proposals for renewable energy development within the City of York's administrative area consider the impacts taking into account existing and committed proposals within the East Riding of Yorkshire.</li> <li>● Policy T4 (and Policy IDC1) - the significant levels of development proposed in the Plan are likely to have a direct or indirect impact on the A1079 / A166 / A64 Grimston Bar interchange. An improvement to the interchange will be required to accommodate the two authorities' combined development aspirations and this should be referenced within the Infrastructure Delivery Plan. It should also be listed in the policy.</li> <li>● Support T6 the longer term aspiration to protect disused railway corridors.</li> </ul>	
English Heritage (EH)	<ul style="list-style-type: none"> <li>● York's historic assets' contribution to the economic well-being of the City should be at the forefront of the plan and sustainable development for York must have as its starting point the conservation of its heritage assets. The plan should include a section specifically on the protection and enhancement of York's special historic character.</li> <li>● There may be potential for some development to take place that would not harm the special character setting in York. Plan will need to clearly justify why it is necessary to develop areas that seem likely to harm elements which contribute to the special</li> </ul>	<ul style="list-style-type: none"> <li>●</li> </ul>

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	<p>character or setting to the historic city.</p> <ul style="list-style-type: none"> <li>• Amend the vision to be more place-specific and articulate the special qualities and distinctiveness of the historic city.</li> <li>• Support the identification of views of the Minster as one of the key defining features of the city</li> <li>• To provide an effective framework for the protection of the historic city the definition of the green belt boundaries must be the starting point for the plan, once the land which it is necessary to permanently keep open in order to safeguard the special character and setting of the city has been identified then the assessed development needs should be factored in.</li> <li>• Land beyond the ring road can also contribute to the special character and setting of the historic city (Figure 5.3).</li> <li>• Concerned about the potential impact that the development of some of the strategic sites might have upon the special character and setting of the historic city, but support Policy SS4, especially criterion v.</li> <li>• Support the principle of identifying sufficient development sites for the duration of the plan and of safeguarding land to provide options for future consideration during the life time of the Green Belt.</li> <li>• The safeguarding and eventual development of SF2 + ST14, SF3 and SF8 would be likely to harm the special character and setting of the city (in conflict with the saved policies of the RSS and national planning policy), as would the development of sites ST6, ST7, ST8, ST19, H37</li> <li>• The strategy for the City Centre in Policy YCC1 is endorsed and the policy should also include an intention to improve/enhance those elements which currently detract from its character.</li> <li>• Support the requirement that York Central (ST5) be developed as a place of outstanding</li> </ul>	

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	<p>quality and design which complements and enhances the existing historic urban fabric of the city. It is essential that the height of the new buildings in and around the station are of a scale which will not harm the character or appearance of the Central Historic Core Conservation Area or detract from the setting of either the listed buildings in and around the site or those elements which contribute to the significance of the city walls.</p> <ul style="list-style-type: none"> <li>• Policy R3 should include a clear statement that a masterplan will be developed for the Castle Piccadilly area and that piecemeal development will not be permitted.</li> <li>• Site ST10 would be very harmful to the underlying objectives of the Green Belt.</li> <li>• Site ST11 includes the Roman camp on Huntington South Moor which is a Scheduled Monument. National policy guidance makes it clear that substantial harm to the significance of such an asset should be wholly exceptional.</li> <li>• Allocation ST15 is unsound and contrary to NPPF due to significant adverse effects on the interest features of the Site of Special Scientific Interest (SSSI) and limited ecological evidence supporting its inclusion in the plan. Extending ST15 will fundamentally change the relationship which the southern edge of York has with the countryside to its south. Overall development of this area would be likely to harm the special character and setting of the City.</li> <li>• There will need to be some assessment of what contribution some sites make to the landscape setting of the character of the respective Conservation Areas lie within or adjoins. If these sites make an important contribution the plan would need to explain why its loss and subsequent development is considered to be acceptable.</li> <li>• It is important that policy ACHM4 includes a requirement for any sites to safeguard those elements which contribute to the special character and setting of the historic city.</li> <li>• Support Policy GI1, Policy T3, Policy T6 and Policy IDC1</li> <li>• DHE2 – Clear that development of some sites should not go ahead because of their impact on the historic environment. However there is clear potential for the development</li> </ul>	

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Body	Representation	Outcome
	<p>of some of the sites to go ahead although there needs to be a more robust assessment of the impact which the development of these sites might have upon the six principle characteristics of the historic City which are set out in the Heritage Topic Paper.</p> <ul style="list-style-type: none"> <li>• Policy DHE11 - Strengthen the explanatory text to state that proposals that harm the character and significance of the City Walls will not be permitted.</li> <li>• Policy DHE13 - It is important that reference is also made to safeguarding any important views out of these landscapes.</li> <li>• Policy GB1 –. Amend Criterion C to read; ‘it would not harm those elements which contribute to the special character and setting of York’.</li> <li>• Section 22 - broadly endorse the approach. It would make things far easier (and ensure consistency in the strategic framework) if the Joint Minerals and Waste Plan set out a single Strategic Policy which could be used in the local plans covered by the Joint MWLP.</li> <li>• Policy T1 vi –The Policy should make it clear that the loss of existing public rights of way, such as the network of snickleways, will not be permitted. Suggested addition to end of Policy T1 iv: ‘Extinguishment of public rights of way which contribute to the special character of the historic city will not be permitted.’</li> <li>• Policy CI1 - for criterion iv add statement that proposals for communications infrastructure will only be supported where there will be no significant adverse impacts upon landscape character, setting, views, heritage assets or green belt objectives</li> </ul>	
Environment Agency (EA)	<ul style="list-style-type: none"> <li>• More should be said regarding the need to increase green infrastructure, specifically within more urban areas</li> <li>• new bullet point to be added to paragraph 3.21:- “safeguard water resources and to protect and improve water quality with an overall aim of getting waterbodies to ‘good’ status under the Water Framework Directive”</li> <li>• Recommend that the sequential approach to the development of sites is included in a</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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	<p>flood risk policy. This should be made clear throughout the Local Plan.</p> <ul style="list-style-type: none"> <li>• Site ST5 lies in flood zone 1 and 2. There are known surface water issues. Suggest no further development to take place until study to identify options and steps to be taken by the Council. Sequential approach to site layout to be taken, with development steered to areas of lowest risk. If needed, sequential and exception tests to be passed.</li> <li>• Site ST7 lies in flood zone 1 and 2. Sequential approach to layout of site to be taken. Expect to see all development located in flood zone 1 and areas in flood zone 2 and 3 used as green/public space. Surface water guidance to be followed.</li> <li>• No further development to take place (ST8, ST11) until study looking at South Beck by the Council and Internal Drainage Board is completed and required works completed.</li> <li>• No further development to take place (ST9) until study looking at Westfield Beck is completed and required works completed in order to mitigate fluvial and surface water flooding. Flood zone 1 and surface water management to be followed. This especially important as site drains into Foss which is major source of flooding and has interaction with Ouse and relies upon management of Foss Barrier and associated pumps.</li> <li>• Site (ST15) contains number of watercourses and Tilmire Drain crosses southern section of site lies in flood zone 3 and therefore inappropriate for residential development. This area could be used as multifunctional green space, flood storage and surface water attenuation within a Sustainable Urban Drainage scheme and open space. This would create an exemplar sustainable scheme.</li> <li>• Strongly recommend that policy ACHM4 has another bullet point added to state that sites for Gypsies, travellers and showpeople will be located out of Flood Zone 3. Caravans and mobile homes intended for permanent residential use are classed as “highly vulnerable” so zone 3 is inappropriate for this type of development.</li> <li>• Policy GI1–The current draft lacks direction and gives no confidence that the measures outlined in the policy would achieve the objectives for green infrastructure. The policy fails to secure any meaningful improvement or show positive planning. Amendments</li> </ul>	



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	<p>could be made to bring the policy in line with NPPF. It should be made clear in this policy that green infrastructure has a dual use as flood storage areas for river or surface water flows. The policy should also reference green infrastructure in relation to an intention for green wall, roofs and soft borders.</p> <ul style="list-style-type: none"> <li>• Policy GI2 – Elements of this policy are vague and would be difficult to enforce or monitor. The third bullet point, relating to on site impacts does need redrafting to reflect the local objectives and NPPF in furthering the enhancement of biodiversity, seeking a net gain in biodiversity, and to better reflect the hierarchy set out in paragraph 118 of NPPF.</li> <li>• Policy FR1 - Reference the relevant parts of NPPF and its own strategic flood risk instead of replicating them. In regards to the catchment flood management plans, a number of actions of relevance to planning have been omitted. Recommend further actions, it is also important that a caveat is made regarding the future of these plans. Also expand to incorporate text from Para. 19.2. 'A sequential approach to the layout of the site must be located within the area of lowest risk. Areas of greater risk (i.e.; flood zones 2 or 3) should be utilised for green infrastructure spaces'. In addition, the Council should be taking a more positive stance and seek betterment from developers to mitigate against future flood risk. This could be in the form of restricting new development on Greenfield sites to the existing run-off rate from a lower order storm event, e.g. a 1 in 1 year storm.</li> <li>• Policy FR2 - For brownfield and greenfield sites, the standards of attenuation storage should be provided. Suggested text 'Sufficient attenuation and long term storage should be provided to accommodate at least a 1 in 30 year storm. Any design should also ensure that storm water resulting from a 1 in 100 year event, plus 30% to account for climate change, and surcharging the drainage system can be stored on the site without risk to people or property and without overflowing into a watercourse'. Also need to consider how you will incorporate sustainable drainage approval boards (SABS) into this</li> </ul>	

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	<p>policy. Alternative text proposed for final sentence of 7<sup>th</sup> para. to make it less prescriptive.</p> <ul style="list-style-type: none"> <li>• Policy CC2, Part A - More should be done to recognise the importance of water efficiency and demand in the future because the efficient use of water resources is an important climate change adaptation and mitigation measure.</li> <li>• Section 21 - Local Plan does not make adequate provision for or policies aimed at protection of the water environment. In particular the plan does not make reference to the Water Framework Directive and obligation. Given the importance of the WFD legislation it is necessary that the York core strategy reflects measures outlined in the Humber RBMP. Strongly recommend that another policy specific to water environment is included in this section which considers rivers and water resources separate to flooding.</li> <li>• The City of York is situated on top of Sherwood Sandstone –a principal aquifer. Developers proposing schemes that pose a risk to groundwater resources, quality or abstractions must provide an acceptable hydro-geological risk assessment (HRA) to the EA and local planning authority.</li> <li>• Policy IDC1 should make specific reference to developers being required to provide contributions towards new flood alleviation schemes, the long term maintenance of existing defences and habitat creation through Community Infrastructure Levy (CIL). Would especially encourage the plan to seek developer contributions for any proposed development within the Foss Basin towards the maintenance/improvement of existing defences i.e. the Foss Barrier.</li> </ul>	

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Hambleton District Council (HDC)	<ul style="list-style-type: none"> <li>• Notes that the assessed growth needs will be met within the plan area without putting development pressure on neighbouring local authorities.</li> <li>• Policy SS1 - like the commitment to not adversely affect local authority areas (e.g. congestion and pollution) and to delivering benefits to the wider sub region.</li> <li>• Concerns over how Site ST14 would impact on the A 1237(T) ring road and increase journey times for Hambleton's residents and workforce using it.</li> <li>• Policy CC1 - Some of the potential areas of search identified for renewable energy (i.e. wind farms) lie adjacent to or close to our boundary, and these have not been subject to any joint working or discussion.</li> <li>• Policy IIDC1 - Note that a CIL mechanism is being progressed alongside the plan to provide for developer contributions so the major infrastructure required to ensure that development proceeds should not be delayed from lack of funding.</li> </ul>	
Highways Agency (HA)	<ul style="list-style-type: none"> <li>• Fully supports the Vision's intention to deliver a fundamental shift in travel patterns and the focus of promoting sustainable development through the location of development in areas of good accessibility</li> <li>• Supports the principles of delivering sustainable development in planning terms. Decisions on future development should consider the emerging agency policy</li> <li>• Welcomes the spatial principles</li> <li>• The spatial distribution and particularly the development of land opportunities in the South and Western part of York including Strategic Sites, Urban Extensions and the New Settlement should be dependent upon agreement of a Management Strategy for the A64 and its junctions with the local primary road network by the agency and the Council.</li> </ul> <p>• Policy SS4 – The development principles for strategic sites are welcomed.</p>	<ul style="list-style-type: none"> <li>• CYC and HA signed-up to the Memorandum of Understanding for A64 Trunk Road York - Scarborough Improvement Strategy</li> </ul>

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	<ul style="list-style-type: none"> <li>• Support the preparation of Supplementary Planning Documents for all strategic sites. However, any infrastructure essential to the delivery of a strategic site should primarily be identified within the Local plan document and infrastructure delivery plan.</li> <li>• Any future work on the impact of the new proposed settlement at Whinthorpe should also consider Site SF3.</li> <li>• Support in principle the intention that the city centre will remain a focus for a number of developments and support the emphasis on accessibility and sustainable transport</li> <li>• Support the principles of development set out for York Central. Also support the production of a Supplementary Planning Document. But, for HA to consider the plan sound it is necessary to identify any strategic infrastructure required to deliver the special policy area.</li> <li>• Policy YC1 - The impact of on the strategic road network It is not yet clear of. The HA proposes to continue to work with the Council to assess the impact of the Local Plan aspirations on the strategic road network and identify physical mitigation required to facilitate development.</li> <li>• Policy EMP 1 and Policy EMP 2 - Adequate assessment of the impacts of these policies has not been provided. The HA proposes to work in partnership with the Council to establish the implications and necessary mitigation measures.</li> <li>• Site ST18 - Further office development in this area will generate additional road traffic. Reassurance is needed from the council that additional office development at this location can be accommodated by the Strategic Road Network (SRN), in particular the A64 Hopgrove junction.</li> <li>• Not currently in a position to be able to consider if allocations are acceptable, as adequate analysis has not been provided on the impact of policies. HA propose to continue to work in partnership with the Council in order to establish the implications of the Local Plan on the SRN.</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Section 23 - On the whole the plan contains strong policy direction on sustainable transport, but policy direction on sustainable transport is not enough, both demand management and additional highway improvements will be required.</li> <li>• At present adequate analysis has not been provided on the impact of development aspirations. HA propose to continue to work in partnership with the council in order to establish the implications of the Local Plan on the Strategic Road Network and determine if and where physical mitigation measures might be required.</li> <li>• It is a particular concern that the Infrastructure Delivery Plan makes no reference to the required improvements on the A64.</li> <li>• Policy T1 –Has concerns regarding the accessibility criteria for the sub urban locations and the lack of specific criteria for the new settlement, given that sub urban and the new development equate to almost 40% of the allocated housing not already committed.</li> <li>• Serious concerns in relation to the lack of evidence to support Policy T4. Without further evidence on the case for specified improvements and traffic impact of the Plan as a whole; and particular concentrations of development (e.g. the new Settlement at Whinthorpe, urban extension at land east of Metcalf Lane) the HA would consider this policy unsound. HA wants to continue to work with the Council with the objective of resolving these matters through the development of a more comprehensive evidence base relating to the impacts of the Local plan on the Strategic Road Network.</li> <li>• Policy T7 - Alongside the flow of traffic in and around the city centre, need to consider the flow of traffic on the Strategic Road Network (SRN). The A64 plays a role in local trips within York. Hoowever, it has a significant strategic purpose which will be undermined by the level of congestion likely to arise from this plan. The level of congestion acceptable on the local network is likely to be different to that which is acceptable on the SRN which has a wider function. HA will continue to work with the Council to determine whether it would be possible to implement traffic management measures on the local road network that would regulate overall traffic flows in line with</li> </ul>	

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Body	Representation	Outcome
	<p>available capacity on the SRN.</p> <ul style="list-style-type: none"> <li>• Policy T8 - Request that Travel Plans should also accompany Transport Statements.</li> <li>• Policy ICD1 - Support the principle that new development will not be permitted unless the necessary infrastructure to meet local and wider (strategic) demand generated by development can be provided and coordinated. Concerned that any physical measures which are identified on the strategic road network or at its junctions with the local primary road network in order to mitigate the impact of development traffic can be funded through Community Infrastructure Levy (CIL) or other appropriate mechanisms. Considered essential that the Highways Agency is party to future discussions on CIL and in particular on the criteria and priorities to be applied in the allocation of CIL funds.</li> </ul>	
National Grid Property (NGP)	<ul style="list-style-type: none"> <li>• Policy ICD1 - although some viability work has been undertaken, this does not consider the full range of potential financial constraints imposed by the draft policies. The respective policies do not incorporate sufficient flexibility to enable a viable solution for delivery to be realised where this is considered to be desirable in planning terms. The approach to viability and delivery of development needs to be comprehensively reviewed.</li> </ul>	•
Natural England (NE)	<ul style="list-style-type: none"> <li>• ST10 – should this site be retained NE would welcome further discussions regarding assessments and potential mitigation to avoid a significant negative impact.</li> <li>• Policy ACHM3 - The Council should be satisfied that less environmentally sensitive areas are not available, if not adverse effects must be mitigated against. The Sustainability Appraisal should further explore alternatives.</li> <li>• Policy GI2 - Makes no distinction between the levels of protection afforded to international, national or local nature conservation sites. More detailed policy (or policies) is required, interpreting locally NPPF and Circular 06/2005. The policy implies that compensation (loss and replacement) is as acceptable as mitigation (effect reduction) but it should reflect paragraph 118 of the NPPF (first bullet point) that where significant</li> </ul>	

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	<p>harm is unavoidable compensation is a last resort.</p> <ul style="list-style-type: none"> <li>• Mitigation and suggested alterations to the Plan are proposed.</li> <li>• Support Policy GI7 part (a) - this delivers multiple benefits. However, sites recognised for their bird interest (e.g. Heslington Tillmire) are especially sensitive to recreational disturbance and this should be recognised. In addition, increased access has the potential to increase trampling of flora, litter, dog fouling and risk of fire. Increased levels of access should be managed according to the nature conservation protection status and sensitivity. To assist delivery, the Infrastructure Delivery Plan must identify improvement to Green Infrastructure as a priority.</li> <li>• Policy CC1 – critical of limited assessment of the ecological effects of renewable energy within the Sustainability Appraisal and Habitats Regulation Assessment (HRA) to support their identification. Particularly concerned about those areas adjacent to the Lower Derwent Valley SPA, SAC and Ramsar, River Derwent SSSI, Derwent Ings SSSI, Heslington Tillmire SSSI and Acaster South Ings SSSI. If these are retained, thorough ecological assessments (including HRA) must be undertaken.</li> <li>• Policy IDC1 - delivery of green infrastructure (GI) is limited in the IDP, of most concern is the deferral of identifying future needs to the GI strategy (para 4.126) without any timetable for this document’s completion. The positive approach to GI and Biodiversity in the plan should be mirrored in the IDP.</li> <li>• Reliance on development contributions and focus on recreational open space (para 4.128) without a strategy in place may jeopardise the delivery of a GI strategy and ecological network as required by the NPPF.</li> </ul>	
Network Rail	<ul style="list-style-type: none"> <li>• Policy T2 - Any new station proposal needs to be developed along Rail Industry guidelines accompanied by a Transport Needs Assessment. The Plan includes a proposal for a new station northwest of York, Haxby and Strensall. It is also our understanding that a new station at York hospital is being considered which does not</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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	appear to be in the draft plan. Any new station needs an agreement from the Train Operating Company that they will call here to be incorporated into a franchise agreement. The requirements for a business case for any new station also stated There is currently strong stakeholder support to speed up journey time between Scarborough and York/beyond and the economic benefits of doing this might outweigh those of a new station. Impact of level crossings will need to be assessed for any new stations.	
North Yorkshire County Council (NYCC)	<ul style="list-style-type: none"> <li>• Support Policy SS1 - seeks to reflect the roles and functions of places in the York Sub Area, the North Yorkshire and York sub region and the Leeds City Region and commits to ensure that that the housing needs of the city's population now and in the future are met within the city of York administrative area.</li> <li>• Support the principle of planning for economic growth in order that the city can perform its sub regional role to the full. Notes and supports the identified need to link economic and housing growth. Would be concerned if housing land take-up outstripped economic growth as this would impact in levels and patterns of commuting. Suggest a robust mechanism to ensure a balanced release of housing land in line with economic growth.</li> <li>• Hasn't seen any evidence to demonstrate that the additional development at York will not have a detrimental impact on North Yorkshire's highway network. In particular the impact of the urban extensions at Clifton Moor and south east at Whinthorpe. Wish to see further detailed analysis of sites and their cumulative impact upon the highway network in York (A64 /A1237) and on cross boundary links to North Yorkshire to destinations including Harrogate (A59/A168 junctions), Selby, Malton and Thirsk/Northallerton</li> <li>• Support in principle the commitment in the plan to set out the boundaries and extent of green belt insofar as it lies within the City's administrative area. Welcomes in principle the commitment to allocate land within the area currently considered to be green belt for</li> </ul>	•



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	<p>development within the plan period as well as further safeguarded land for development thereafter.</p> <ul style="list-style-type: none"> <li>•Support policies that seek to promote the redevelopment of sustainable central sites including those within the city centre and at York Central. Support for proposals to expand the Central Business District. It is recognised that a new, high quality City Centre Office quarter would help York achieve its strategic ambitions and it appears that York Central is the only location that can provide this. Should aspects of the York Central allocation prove to be undeliverable within the plan period it would be likely to result in greater demand at locations such as Monks Cross putting greater pressure on the A64, the outer ring road and the wider highway network.</li> <li>•Site ST21 - It is not clear what the need or justification is for Use Class D2 development at this location); what alternative locational options may be available; nor what its potential impact on the wider highways network or nearby settlements could be.</li> <li>•Support Policy R1- safeguard and promote the retail vitality of the city centre.</li> <li>•Support Policy R4 - seeking to limit further retail development at Monks Cross.</li> <li>•Sites ST14 + SF3 and ST15 - Would be significantly bigger than nearby settlements. It is unclear what other services are needed or proposed to support the urban extensions and ensure sustainability and therefore what the related implications for the A64(T)/Outer Ring Road (A1237), the wider highways network and surrounding settlements might be. Suggested this be the subject of ongoing cross boundary discussions with neighbouring local authorities as plan further develops.</li> <li>•Section 1, Section 19 and Section 20 – The strong policy linkages between climate change, flood management, green infrastructure and minerals planning agendas could be further explored through collaborative working between authorities on relevant aspects of the Plan.</li> <li>•Policy CC1 - A number of areas of search for renewable energy generation identified, in many cases close to the boundaries of neighbouring authorities including within north</li> </ul>	

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	<p>Yorkshire. It is therefore important that cross-boundary discussions take place to consider the wider impact of such developments, individually and cumulatively</p> <ul style="list-style-type: none"> <li>•Policy WM1 - It would be helpful if greater clarity could be provided on the approach of facilities for municipal waste. Alternatively, reference could be made to a need to identify capacity for the management of all waste streams, as this may provide more flexibility including circumstances where a proportion of waste is managed outside the area. It would be helpful of clarity could be provided that the bullet point priority list is intended to apply specifically to the delivery of facilities on the CYC area, as different priorities may be appropriate in other parts of the Joint Minerals and Waste Plan area. It may be preferable to apply this requirement to significant new development only, as provision for waste management may not be appropriate or viable in some very small schemes. Through reference to provision for waste management and onsite management of waste retail and commercial development.</li> <li>•Policy WM2 - It would be helpful if it could be clarified that the criteria for site allocation are only intended to apply in the Council area rather than across the whole of the joint area plan. It may not be realistic or necessary to meet these criteria for minerals development, where geological factors may be a fundamental constraint on location. <ul style="list-style-type: none"> <li>○ Para 22.12 - identification of a Minerals Safeguarding Area for coal bed methane is unlikely to be feasible and probably unnecessary</li> <li>○ para 22.13 - -It may be preferable to state that the LAA has not presented specific evidence on aggregate mineral requirements for the York area. It may be helpful to clarify whether the reference to fracking is intended specifically in the context of exploitation of shale gas (for which there is no apparent evidence of commercial interest in this area), or is intended to be read in association with the immediately following reference to coal bed methane, in which case it is suggested that the reference to fracking (which is a term not usually used in association with coal bed methane) be deleted.</li> </ul> </li> </ul>	

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	<ul style="list-style-type: none"> <li>• Policy IDC1 - Seek clarification that it is not the intention to seek direct funding from the Leeds City Region LCR for the provision of essential infrastructure necessary to support the plan.</li> </ul>	
Ryedale District Council (RDC)	<ul style="list-style-type: none"> <li>• Policy SS1 - Support the overall spatial strategy and the York sub area approach. The strategy recognises and builds on the city’s roles as a key economic driver and higher order economic, retail and service centre. The approach reflects longstanding agreement and support for this role, both in terms of the York sub-area and the role and influence of the city in the wider region.</li> <li>• Policy SS2 - The approach is entirely consistent with Ryedale’s emerging Development Plan which recognises the functional economic area of the City of York, travel to work patterns and housing market dynamics.</li> <li>• Policy SS3 - Concerned about the impact of growth on cross boundary strategic infrastructure, most notably the A64. Keen to work with the Council, other adjoining authorities and the HA to ensure that the cumulative impact of growth can be addressed and a coordinated approach to developer contributions/Community Infrastructure Levy to secure improvements can be considered and agreed.</li> <li>• Policy SS5 - The preferred role of the green belt is appropriate</li> <li>• Policy SS6 - The approach to safeguarded land is appropriate</li> <li>• It would be useful if the Economy section of the Plan could reflect the economic opportunities associated with the FERA site on the York/Ryedale boundary.</li> <li>• Policy H1 - Support the level of housing growth proposed</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
Selby District Council (SDC)	<ul style="list-style-type: none"> <li>• Is satisfied that there has been satisfactory ongoing cross-boundary cooperation between Selby and York through officer and members bodies.</li> <li>• Policy SS1 <ul style="list-style-type: none"> <li>○ Broadly support York’s recognition of itself as the gateway to north Yorkshire and the spatial planning responsibilities that brings as the leading settlement in the sub</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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	<p>region (after Leeds).</p> <ul style="list-style-type: none"> <li>○ Is pleased to be recognised as a key district that supports York’s role though providing a ready workforce and customers and also that Selby provides an attractive countryside setting for the city.</li> <li>○ is satisfied that York can realise its growth aspirations within its own territory</li> </ul> <ul style="list-style-type: none"> <li>● Policy SS2 - The ambitious growth targets are acknowledged and supported in principle.</li> <li>● Policy SS5 - Selby is looking to review the green belt (where it applies in Selby District). A coordinated approach would be beneficial. Would welcome exploration of opportunities, where appropriate, for joint commissioning.</li> <li>● Site SF3 (+ST15) - Concerns about highway impact on A64, lack of public transport infrastructure and visual intrusion in the flat landscape.</li> <li>● ST21 - Query the reasoning behind designating this site for leisure development as it is a shopping centre not a leisure destination. Any development that increases this attractiveness of this out of centre location must be rigorously considered with more information to assess to potential strategic impact on Selby Town as a Principal Town.</li> <li>● ST15 - Concern at the lack of information available to prepare a detailed response on this which is clearly a significant new settlement of 5580 close to Selby’s border. Concern centred around highways impact on congested A64. Selby’s own growth will potentially add a significant number of journeys on the A19 to York and without certainty of Whinthorpe’s access arrangements Selby cannot properly consider the implications. The broad location has not been fully explored and evaluated in the context of alternative sites.</li> <li>● Policy CC1 – SDC considering its future options towards renewable energy generation in the context of wind farming, and notes the significant areas of search highlighted on the proposals map adjacent to Selby District. Would welcome joint working in future studies to address this issue in a coordinated manner.</li> </ul>	

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Yorkshire Water Services Ltd (YWS)	<ul style="list-style-type: none"> <li>• Supports that the local plan will ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk.</li> <li>• Council will prepare SPD`s regarding all strategic sites. This is seen as an opportunity to develop, test and encourage new and emerging technologies related to sustainable drainage and water saving. YWS would welcome the opportunity to work with the Council, developers and stakeholders to pursue these possibilities.</li> <li>• Policy YCC1 - Support the inclusion of criterion x</li> <li>• Policy YC1 - The York Northwest corridor is being promoted as an Urban Eco settlement with sustainable living at the core. York central falls within this but has no mention of Sustainable Urban Drainage Systems, drainage or water management. Additional reference to this important issue to be in the policy.</li> <li>• Policy GI1:               <ul style="list-style-type: none"> <li>○ The definition as given for green infrastructure is not particularly strong. States that GI is the term used for overarching framework related to all green assets. Further to paragraph 2.15 (Spatial Portrait) there is no information regarding what could be considered green infrastructure. No specific mention of water or blue infrastructure further to mentioning the rivers as green corridors.</li> <li>○ Sustainable Urban Drainage Systems (SUDS) represent an important step in managing the effects of climate change and reducing flood risk. SUDS in new developments may include ponds, scapes, drainage channels etc and it is likely that these would be designed as part of green infrastructure and its contribution to open spaces, biodiversity etc.</li> </ul> </li> <li>• Policy GB5 - Elvington WTW, Naburn, Rawcliffe and Haxby Walbutts Water Treatment Works all listed as large developments. Criteria should allow for continued development of the works to meet growth in housing and population proposed. Currently written, the criteria may impede the ability to create additional capacity and develop new and sustainable technologies.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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	<ul style="list-style-type: none"> <li>• Support Policy FR2 - It advocates the use of SDS within new developments. Involvement needed in the design and feasibility of SDS in all new developments where the system will eventually communicate with a public sewer. Wording should be included within the text to encourage developers to open dialogue at an early stage. This will become critical once the legislation for compulsory adoption is introduced in April 2014. Adoption (2012) of the City of York Surface Water Management Plan, links to this plan could be strengthened.</li> <li>• Policy FR3 - Ground water management and the text in 19.7 and 19.8 appear to be lightly confused. Suggest seeking further clarification on these issues and consider separate policies on land drainage and ground water management.</li> <li>• Policy CC2 - Focuses purely on energy demand and renewable technology and fails to include information and requirements related to water saving and sustainable drainage. Designing in and retrofitting water saving technology into developments is key to ensuring an adequate supply of clean water for future generations. Reducing the reliance on drinking water for tasks such as flushing toilets and watering gardens etc. should be considered in all new development.</li> <li>• Policy EQ2 - Water quality is not referred to.</li> <li>• Policy WM2 – Amend criteria for allocating new minerals</li> </ul>	
York Teaching Hospital NHS Foundation Trust	<ul style="list-style-type: none"> <li>• Policy CF4 - The major redevelopment of the Hospital over the next few years is an issue.</li> </ul>	•
Further Sites Consultation (2013)		
ERC	<ul style="list-style-type: none"> <li>• Continued general support for the approach taken.</li> <li>• The Council is currently working with the Highways Agency and the City of York Council</li> </ul>	•

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	to assess the cumulative impact of both authorities' Local Plans on the A1079/A166/A64 Grimston Bar interchange. Sites 97, ST7, ST15, SF3, 811,802, 815, 22, 747 and 794 should be factored into the transport assessment for the A64 interchange	
English Heritage (EH) – now Historic England (HisE)	<ul style="list-style-type: none"> <li>• Concern around the impact some sites may have on special character and setting of the city as well as impact on Green Belt. Call for a more robust assessment of the impact development will have on the six principal characteristics of the historic city.</li> <li>• Offered observations on the respective impacts/harm of sites 180, 182,183, 187, 241 / ST14, 253, 298, 752, 779 800 / SF7, 627 / H11, 654 / H19, ST2, ST7, ST11, ST14, ST15, ST19, SF3 and SF8 on landscape setting, Green Belt, green wedges, scheduled monuments, listed buildings, conservation areas, the historic core and character and setting.</li> <li>• Support sites 3, 9, 772 and 253 not being taken forward.</li> <li>• Site 794 development would fundamentally change the relationship which the southern edge of the city has with the countryside to its south, hence altering people's perceptions when travelling along this route about the setting of the city within open countryside – harm special character and setting.</li> </ul>	•
Environment Agency (EA)	<ul style="list-style-type: none"> <li>• Site 800 – Part of the site is within flood zone 2 &amp; 3. It is requested that the site is subject to the flood risk Sequential Test to ensure that there are no alternative sites available that are at a lower level of flood risk. If the site passes the sequential we would request that any future development on this site adopts a sequential approach to the site layout in order to minimise the risks of flooding for future users, and also that appropriate mitigation measures are adopted with the site design. Site egress and access should also be carefully designed, as the area of flood zone 3 dissects the site.</li> <li>• Site ST10 – concerned about the “soundness” of this strategic site and proposed changes. The nearby Askham Bogs SSSI is designated as such due to its Fen communities and unique insect fauna that are dependent on the site's hydrology. The</li> </ul>	•

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	<p>site’s developers have stated that development for residential purposes would impact the SSSI’s hydrology however the site and proposed changes are yet to be environmentally assessed as part of the Sustainability Appraisal. Strongly advise this assessment takes place ASAP.</p> <ul style="list-style-type: none"> <li>• Site ST15: <ul style="list-style-type: none"> <li>○ Parts of the site contains areas that are in flood zones 2 &amp;3, but have no objections to it being taken forward, provided it can be demonstrated that this flood risk is manageable on site via sequential layout i.e. zones 2 &amp;3 used for green space.</li> <li>○ The IDB must be satisfied that surface water can be adequately managed on site so as not to increase flood risk to others.</li> <li>○ Support Natural England’s approach and request that the landowner demonstrates that any future development of the site will not alter the hydrology of the SSSI in any way that will have a significant negative impact on the flora and fauna that it supports.</li> </ul> </li> <li>• Site 9 - Strongly support it not going ahead as it is in flood zone 3 and would not be compatible with highly vulnerable use as according to Planning Practice Guidance.</li> <li>• It is important to consider the need for adequate foul drainage to be provided at Gypsy, Roma and Traveller sites. These sites need to accommodate for everyday foul water and the disposal of chemical toilets. Ideally the sites should be located in an area that can connect to the mains sewer system. However, these sites are often proposed in remote locations that do not have a mains sewer in the vicinity. This means that a non-mains foul drainage option needs to be provided. Strongly encourage early consultation with EA to help determine whether sites are viable and to realise the cost implications associated with certain site locations.</li> <li>• CYC may wish to ensure that its approach to flood risk, and especially the application of the Sequential Test, is in accordance with NPPF.</li> </ul>	



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Highways Agency (HA)	<ul style="list-style-type: none"> <li>•The Highway Agency’s key concern is to protect the primary role of the Strategic Road Network (SRN) and to ensure its safe and efficient operation. Sites 183 and 187 (residential development), sites 97 and 800 (employment development) and site 794 (university development) may have an impact on the SRN and would therefore be of interest to HA:</li> <li>•A number of changes to strategic sites have been recommended for inclusion by CYC. Sites ST14 and ST15 are of particular interest. The HA would like to see clarification as to whether the changes strategic sites will result in an increase (or decrease) in the number of dwellings or employment land for these sites.</li> <li>•A number of sites (813, 183, 811, 802, 815 &amp; 810) are of interest to the agency due to their size or location or both. The site at Earswick (810) is of particular interest due to its proximity to the A64 Hopgrove junction. A detailed assessment would be required to ensure the impact of this site on the strategic network can be managed and mitigated.</li> <li>•The Agency will be in a position to provide more detailed comments on the cumulative impact of new sites through the modelling exercise being undertaken in partnership with CYC. HA is awaiting further input from CYC before proceeding with the mesoscopic modelling exercise to assess the cumulative impact of the local plan development on the SRN.</li> <li>•Site 800 – Recommended in the document as an option for relocating and expanding the existing park and ride site. This 15.1 ha parcel of land at is significantly larger than would be required for a park and ride and identifies that the other land use could be employment. HA would like to seek clarification regarding the existing park and ride site, including what is proposed for the existing park and ride site land following its relocation HA will require additional information demonstrating the impact of the site expansion and additional land uses on the SRN and how these can be managed and mitigated.</li> <li>•Site 253 - Recommended in the document as a compressed natural gas station and freight consolidation centre. HA will require additional information demonstrating the</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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	impact of the site but support the conditions attached to this site within the recommendation.	
National Grid (NG)	<ul style="list-style-type: none"> <li>• Site ST1 - NG does not object to future development surrounding the substation site but would like to stress its importance as part of the electricity transmission network. The site is “Operational Land” and in future there may need to be further essential utility development in the future.</li> <li>• The following proposed sites are in close proximity to or crossed by National Grid’s high transmission overhead lines: ST1 ST9, SF4 and 810. NG does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place its equipment on their land. Potential developers of these sites should be aware that it is NG policy to retain our existing overhead lines in-situ. NG advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.</li> <li>• Site ST7 - Is crossed by NG underground cable. Whilst NG welcomes the inclusion of strategic green space it requires that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soils are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of its cable(s) must be maintained at all times.</li> </ul>	•
Natural England (NA)	<ul style="list-style-type: none"> <li>• Site ST10 - The developers of the site have, subsequent to previous NE advice, presented hydrological assessments of increased surface water flows from the development into Holgate Beck, and potential changes to the SSSI’s water levels and quality. However detailed evidence has not been provided to satisfy NE’s concerns and we remain concerned that allocation ST10 is unsound.</li> <li>• Site ST15 Due to the scale and close proximity to the SSSI, the positive measures proposed by the landowner are unlikely to mitigate the significant adverse effects of this allocation. The council should therefore consider whether this would be justified by the</li> </ul>	•

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	<p>benefits of development at this location, and we encourage the council to consider fully alternative sites through the sustainability appraisal. If no less environmentally sensitive location is identified and the council decide to retain this substantial allocation, it would be necessary to locate the new housing a minimum of 400m from the SSSI and put in place (and secure in perpetuity) a) the measures which will be necessary to manage visitor numbers and disturbance on the SSSI b) alternative green spaces within the settlement which will attract residents away from the SSSI and c) funding methods for long term management of these mitigation measures.</p> <ul style="list-style-type: none"> <li>• Site 253 – This allocation must be supported by appropriate evidence that it will not contaminate this water course and Askham Bog SSSI and at times of high rainfall there can be overflows from the nearby sewage treatment works and potential for the SSSI to be flooded.</li> <li>• Sustainability Appraisal (SA) – The further sites SA Technical Note only assesses non-strategic sites. Without the full SA of the strategic sites and transport allocations it would be premature for NE to advise on those allocations where significant effects to nationally protected nature conservation sites are likely. Furthermore, at this stage, no detail has been provided on the assessment of reasonable alternatives.</li> </ul>	
Network Rail (NR)	<ul style="list-style-type: none"> <li>• Representation is that of Network Rail Infrastructure Limited (NRIL), as the York Central site is predominantly owned by NRIL</li> <li>• As a result of the further work NRIL has recently been undertaking to bring forward York Central for development there is merit in making limited amendments to the Local Plan, as outlined below:               <ul style="list-style-type: none"> <li>○ Seek to deliver a greater quantum of residential provision than 450.</li> <li>○ suggest that the over-prescriptive wording of the Plan is amended to:                   <ul style="list-style-type: none"> <li>▪ State that York Central could provide between 1000 and 1500 dwellings.</li> <li>▪ Acknowledge that approximately 400 homes would be delivered in the initial phase</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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	<ul style="list-style-type: none"> <li>of development,</li> <li>▪ Reflect the overlap between predominantly residential and mixed-use should not be considered precise, to safeguard future flexibility.</li> <li>▪ Refer to an anticipated new bridge from Holgate Road over the railway lines to serve the development, with secondary bridge options available (if needed)</li> <li>▪ Remove the reference to seeking to deliver standards for Eco-Towns for York Central</li> <li>○ Vehicle trips generated by commercial space are likely to place a greater burden on the network than residential properties.</li> </ul>	
NYCC	<ul style="list-style-type: none"> <li>• In large part, these potential changes would not seem to present significant strategic cross-boundary issues for the County Council. However, it does have specific comments in relation to Site Reference 183, Land to the North of Escrick Village:               <ul style="list-style-type: none"> <li>○ A development of the scale supported by Site Reference 183 has the potential to change the nature of Escrick village and its role as a Designated Service Village within Selby District’s settlement hierarchy. It is not clear how the proposed allocations are intended to relate to the policy context for Escrick as defined within the Selby Core Strategy.</li> <li>○ It is imperative that before these two site allocations [Site Reference 183 and a safeguarded site for up to an additional 63 dwellings] are confirmed, there is clarity and agreement with Selby District Council through appropriate cross-boundary discussions. These discussions and agreement should include whether it is intended that the allocations are to help meet some of Selby’s housing needs within the locality. The County Council strongly urges the City have full regard to SDC’s representations in relation to this matter.</li> <li>○ As the Local Highway Authority (LHA), NYCC has been in discussions with SDC and the City of York regarding necessary evidence to demonstrate the cumulative impact that the proposed future development will have on the local highway network. Where</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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	<p>the proposed development has a detrimental impact on an identified junction mitigation measures and details of the delivery of such measures must be demonstrated to satisfy the LHA. Where it is clear the development will have a material impact on North Yorkshire’s local highway network the LHA will want to be included in agreeing the scoping for the Transport Assessment and Travel Plan</p> <ul style="list-style-type: none"> <li>○ Whilst Site Reference 183 lies within the CYC administrative area it simultaneously falls with the Escrick School catchment area. It is considered that the pupil yield arising from the development of the proposed allocation could be accommodated by on-site expansion of the existing school. The local education authority would seek a developer contribution of £258,000.</li> <li>○ The LHA will continue to liaise with York to ensure a satisfactory evidence base is developed to identify appropriate and acceptable impact on the local highway network.</li> </ul>	
SDC	<ul style="list-style-type: none"> <li>●ST15 - SDC’s position unchanged but would like more information regarding the proposed highway access to the site before commenting further.</li> <li>●Site 91 - Escrick is a Designated Service Village in the Selby Core Strategy Local Plan. SDC envisages, in principle, that some development may be appropriate to meet some of the District’s assessed housing need. Selby District, Escrick is constrained by the defined York Green Belt in the Selby District and by the Draft Green Belt in the York UA area. Selby is considering a review of the Green Belt and this may be done in advance of any allocations. At this stage SDC not objecting to this site, but is pending its position pending further information and discussion. Any proposals for substantial additional growth needs to be thoroughly jointly assessed to ensure that these numbers are proportionate, reasonable and the village and its services can cope with such a level of growth. Before making further comments SDC would welcome further discussion to clarify a number of matters, as follows: <ul style="list-style-type: none"> <li>○ SDC considers that under the Duty to Cooperate, Escrick should be addressed</li> </ul> </li> </ul>	●

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	<p>comprehensively as a settlement, rather than treating it separately in two Local Plans. Therefore further discussion regarding all of the available land around Escrick should be had before any allocation is made in either Local Authority's Local Plan</p> <ul style="list-style-type: none"> <li>○ SDC would be concerned to avoid double allocation in the village. Therefore SDC would like to explore options for appropriate growth that would satisfy the needs of both Local Authorities in terms of housing growth being met by development at Escrick.</li> <li>○ SDC is concerned about the impacts of the proposed scale of growth on social and physical infrastructure. SDC would like to understand the methodology CYC has used to establish               <ul style="list-style-type: none"> <li>a. the appropriateness of Escrick village for growth in principle;</li> <li>b. the proposed figure of 128 units</li> <li>c. available infrastructure capacity to support growth (principally highways, education, water and drainage as these are issues highlighted in Selby's Infrastructure Delivery Plan.</li> </ul> </li> </ul>	
York Teaching Hospital NHS Foundation Trust	<ul style="list-style-type: none"> <li>● Ask that as the proposals develop, a clear impact assessment is undertaken and associated measures implemented through S106 agreements to apply countermeasures.</li> <li>● Additional houses to the extent that is being planned will have a serious impact on Wigginton Road, upon which the main hospital is situated, and the Trust asks that consideration be given to the impact on transport.</li> <li>● The impact on local health services both primary and secondary care will need to be considered as part of the planning process.</li> <li>● Urge that engagement with health and emergency services is commenced as soon as is practicable.</li> <li>● There will be an impact on the acute (York Hospital) sector that will need to be</li> </ul>	<ul style="list-style-type: none"> <li>●</li> </ul>

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	<p>recognised</p> <ul style="list-style-type: none"> <li>•NHS Property Services own the Bootham Hospital site and the Trust supports the redevelopment of this site as is not fit for its current purpose.</li> <li>•Willing to meet again to consider the impact of the Plan on the Hospital Trust and wishes to be kept informed of progress.</li> </ul>	
<b>Preferred Sites Consultation (2016)</b>		
The Coal Planning Authority (CPA)	<ul style="list-style-type: none"> <li>•The issue of unstable land due to former coal mining activity should be fully considered, using the latest data-set, prior to the final site selection being made.</li> </ul>	
ERC	<ul style="list-style-type: none"> <li>•Recommends further consideration of A64 / A1079 Grimston Bar Interchange.</li> </ul>	<ul style="list-style-type: none"> <li>• Developer / promoter of Strategic Site ST15 has proposed widening of slip roads and enhanced capacity at Grimston Bar under a later phase of the development.</li> </ul>

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<b>Body</b>	<b>Representation</b>	<b>Outcome</b>
EA	<ul style="list-style-type: none"> <li>• Welcome that this further review of sites has been undertaken to ensure that a sequential approach to the allocation of sites has been used.</li> <li>• The CYC SFRA update should be used to inform the site selection process</li> <li>• Flood risk comments relating to particular sites:               <ul style="list-style-type: none"> <li>○ H25, H37 and H50 – pleased to see these have been removed with flood risk cited as one of the main reasons for removal</li> <li>○ ST5                   <ul style="list-style-type: none"> <li>▪ Sequential approach should be taken</li> <li>▪ No development should take place in Flood Zone 3b and compensatory storage required for development in Flood Zone 3</li> <li>▪ Valuable opportunity to de-culvert Holgate Beck</li> </ul> </li> <li>○ ST15 - A sequential approach to development should be taken with all development in Flood Zone 1, with Flood Zones 2 and 3 being left as green open space.</li> <li>○ ST32 – The site lies mostly within Flood Zone 3, albeit benefitting from defences.</li> <li>○ (selected) Water quality / WFD Comments relating to particular sites</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
HDC	<ul style="list-style-type: none"> <li>• Expressed concern about deliverability of chosen sites causing overspill if cannot be fulfilled.</li> </ul>	
Harrogate Borough Council (HBC)	<ul style="list-style-type: none"> <li>• Acknowledge that CYC used same consultant as HBC to provide advice on Objectively Assessed Need for housing</li> <li>• Expressed concerns regarding:               <ul style="list-style-type: none"> <li>○ Housing requirement                   <ul style="list-style-type: none"> <li>▪ may be an underestimate beyond the Plan Period</li> <li>▪ May have less flexibility and end of Plan period than expected</li> </ul> </li> <li>○ Green Belt review                   <ul style="list-style-type: none"> <li>▪ approach may be unsound and runs contrary to CYC’s Counsel advice given in 2015</li> </ul> </li> </ul> </li> </ul>	



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	<ul style="list-style-type: none"> <li>▪ In the absence of safeguarded land <b>it is inevitable</b> that Green Belt boundaries will need to be reviewed at the end of the plan period <b>or York will seek to export development needs to neighbouring authorities</b></li> </ul>	
HisE	<ul style="list-style-type: none"> <li>•Would like to take York’s Plan to its national Advisory Committee.</li> <li>•Welcome the reduction in the amount of growth which is proposed around the periphery of the built-up area of the City.</li> <li>•While the development of York Central (ST5) and the two freestanding settlements (ST14 and ST15) may provide part of the solution to safeguarding a number of important elements identified in the Heritage Topic Paper Update, their development could also, potentially, harm other aspects that contribute to York’s special Character.</li> <li>•Remain to be convinced that the quantum of development proposed at ST5 is actually deliverable.</li> <li>•There is considerable merit in continuing to explore the potential offered by new settlements. The degree of harm could be far less than would be caused should the housing in those settlements be located, instead, on the edge of the existing built-up area of the City or in its surrounding settlements. It appears evident that the size of these settlements and their location has been designed to take account of the relationship which York has with its existing surrounding villages. Any support to new settlements is given on the basis that it can be demonstrated they are a key component of a wider strategy designed to achieve the protection of key elements which contribute to the special historic character and setting of York and that they will be delivered in a manner which will minimise any harm to the rural setting of the City.</li> <li>•It is not clear what impact the infrastructure requirement necessary to deliver these new settlements will have upon York’s character and setting. For example, a grade-separated junction on the A64 to the south of the University to access ST15 could cause considerable harm to the setting of the City in this location.</li> </ul>	

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	<ul style="list-style-type: none"> <li>•Have particular concerns about the area identified for future expansion of the University</li> <li>•Essential to publish the latest version of the Heritage Impact Assessment alongside this current consultation.</li> <li>•Detailed comments on sites               <ul style="list-style-type: none"> <li>○ Sites ST6 and ST31 - would result in serious harm to SA Objective 14 (Historic Environment) and should be deleted</li> <li>○ Sites ST14 and ST15 – have potential to result in serious harm to SA Objective 14</li> <li>○ Sites ST7, H57, ST8 ST19 and ST27 are likely to result in serious harm to Objective 14, but have mitigation is suggested</li> </ul> </li> </ul>	
Highways England (HighE)	<ul style="list-style-type: none"> <li>•Reserves its overall position until the results of analysis are available.</li> <li>•Require that the capacity enhancements and infrastructure needed to deliver strategic growth is identified at the plan making stage to allow it time to assess the suitability, viability and deliverability of such proposals on the strategic road network (SRN).</li> <li>•Not yet in a position to consider if the Spatial Distribution of the preferred sites is acceptable.</li> <li>•The spatial distribution, particularly the development of land opportunities in the south and eastern parts of York, should be dependent upon agreement of a Management strategy for the A64 and its junctions with the local primary road network by HighE and the Council.</li> <li>•ST15 - A new access has been agreed in principle One of the provisos of this agreement is that there is no through route into York.</li> <li>•The impact of Site ST15, Site ST27, housing sites in Dunnington and Wheldrake, potential employment allocations at Elvington airfield, Wheldrake Industrial Estate and Elvington Industrial Estate and sites along Hull Road upon the A64 Grimston Bar junction must be considered. HighE’s initial modelling of Local Plan aspirations identifies issues in future years at this location.</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Further work is required to establish the impact of development in Area 4 at Hopgrove</li> <li>• The sites at Haxby, Land west of Wigginton Road and Land North of Monks Cross will impact on Hopgrove junction.</li> <li>• Requested a copy of the Local Model Validation Report (LMVR) once available..</li> <li>• Proposes to work in partnership with City of York Council to establish the implications of the preferred sites on the SRN</li> </ul>	
Internal Drainage Board	<ul style="list-style-type: none"> <li>• Always seeking, where possible, that the risk of flooding should be reduced as far as is practicable.</li> <li>• In an area where drainage problems exist, development should not be allowed at any location until the Authority is satisfied that the surface water drainage has been satisfactorily provided for.</li> <li>• Does not consider development in Flood Zone 3 is desirable or sustainable in the longer term.</li> <li>• If CYC would like to provide details of the areas selected for development, that fall within the Board's drainage district, it would consider them and provide comment, as appropriate.</li> </ul>	
NG	<ul style="list-style-type: none"> <li>• No comment to make in response to the consultation</li> <li>• National Grid wishes to be involved in the preparation, alteration and review of plans and strategies that may affect its assets.</li> <li>• Reminded CYC to consult National Grid on any Development Plan Document or site-specific proposals that could affect its infrastructure.</li> </ul>	
NGP	<ul style="list-style-type: none"> <li>• Support allocation H1 (for 336 dwellings)</li> </ul>	

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NE	<ul style="list-style-type: none"> <li>• Welcome the use of Green Belt principles to buffer biodiversity from inappropriate development as well as the protection of landscape character where appropriate.</li> <li>• Offers advice, including :               <ul style="list-style-type: none"> <li>○ Site ST15                   <ul style="list-style-type: none"> <li>▪ Due to the scale and proximity to the SSSI encourage the Council to consider fully alternative sites through the SA.</li> <li>▪ If the Council decides to retain this allocation it would be necessary to locate new housing a minimum of 400m from the SSSI and put in place (and secure in perpetuity) a) the measures which will be necessary [to] manage visitor numbers and disturbance on the SSSI b) alternative green spaces within the settlement which will attract residents away from the SSSI and c) funding methods for long term management of these mitigation measures.</li> <li>▪ The Site could have less impact upon the SSSI than the previous iteration of ST15, but reiterate advice that alternative locations for less sensitive areas be fully explored before any allocation is made in the Local Plan.</li> <li>▪ The site requirements or site policy for ST15 should include the requirement to mitigate for, or as a last resort, compensate for impacts on Elvington Airfield SINC.</li> </ul> </li> <li>○ ST31                   <ul style="list-style-type: none"> <li>▪ poses less risk than ST10</li> </ul> </li> </ul> </li> </ul>	
NYCC	<ul style="list-style-type: none"> <li>• No cross boundary issues arising from the strategic sites</li> <li>• Request further consultation to review the results of further transport evidence work and discuss any implications relative to the sites selected – has a particular interest in the A59</li> <li>• Agrees with the importance of both upgrading the A1237 through dualling and appropriate junction improvements; and maximising of the significant opportunities presented by the redevelopment of the York Central Site.</li> </ul>	

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North Yorkshire Police (NYP)	<ul style="list-style-type: none"> <li>• New housing and business development place additional demands on policing and police infrastructure.</li> <li>• NYP investing significantly in information and communications technology.</li> <li>• NYP reviewing its estate strategy from an operational and corporate point of view.</li> <li>• Would welcome the opportunity to provide a specific response when the Publication Draft Local Plan is issued in 2017 as it is clear that all of the proposed allocations listed within the Plan will have an impact on policing in the City of York.</li> </ul>	
RDC	<ul style="list-style-type: none"> <li>• No strategic sites or site specific proposals for different land uses that would have significant implications for this District.'</li> </ul>	
SDC	<ul style="list-style-type: none"> <li>• Looking forward to further dialogue and strong DTC relations with York, resulting in both Councils supporting the others approach.</li> </ul>	
Tees, Esk and Wear Valleys NHS Foundation Trust	<ul style="list-style-type: none"> <li>• The Trust is developing plans for a new build development which could provide 60 inpatient mental health beds in York – 11 locations under consideration - seeking acknowledgement of the potential health use of the locations.</li> </ul>	
York, North Yorkshire and East Riding Local Enterprise Partnership	<ul style="list-style-type: none"> <li>• Response focused on three key issues               <ul style="list-style-type: none"> <li>○ York as an economic driver for the wider York, North Yorkshire and East Riding economy</li> <li>○ The importance of delivering York Central</li> <li>○ The importance of a positive collaborative relationship with neighbouring authorities</li> </ul> </li> <li>• City of York occupies a unique position within the York, North Yorkshire &amp; East Riding economy acting as a driver of both the economy and sitting at the heart of functional housing, travel to work and travel to learn geographies.</li> </ul>	

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	<ul style="list-style-type: none"> <li>• The success of York directly impacts on its neighbours and proximity to the City is a key driver for its rural hinterland.</li> <li>• Endorse the progress made by City of York in establishing a much needed local plan and fully support further work to ensure the viability and deliverability of the plan and to strengthen partnership working with its neighbouring authorities.</li> <li>• Delivering flagship strategic sites such as York Central alongside critical infrastructure such as A1237 York Ring road must be enabled through this Local Plan which supports and enables high value private sector growth and will provide business and investors with the confidence they need to boost the economy of York, North Yorkshire &amp; East Riding. The LEP will work closely with CYC and partners to assist this process.</li> <li>• In addition to protecting the special character of York, which is a major economic driver and asset for the LEP area, there are some major infrastructure challenges to accommodating growth in and around the city. In particular the dualling of the A1237 outer ring road to improve east-west connectivity is vital for the future success of York and the LEP area. The LEP is committed to working with City of York Council and other partners to achieve this at the earliest opportunity.</li> <li>• The LEP remains committed to supporting delivery of these strategic priorities for York and will fully support a Local Plan which provides for these ambitions.</li> <li>• fully support York Central within the City of York Local Plan:               <ul style="list-style-type: none"> <li>○ York Central is an ideal location for Grade A office space.</li> <li>○ Early delivery of York Central, though the enabling infrastructure should be a priority for City of York Council.</li> </ul> </li> <li>• The relationship between City of York and its neighbouring authorities is crucial.</li> <li>• Joint working, long term planning and collaboration is the only way to truly deliver on the economic potential of the region. Business decisions, together with travel to work patterns all span well beyond individual Local Authority boundaries and accommodating</li> </ul>	

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	both the employment and housing needs for the wider region requires all parties to work together.	
Yorkshire Ambulance Service	<ul style="list-style-type: none"> <li>•YAS has revised the way in which it locates its vehicles in order to meet the more stringent national NHS response targets. This has led to the development of a more time and cost efficient service that is response-led, based upon a ‘Hub and Spoke’ system.</li> <li>•The ‘Hub and Spoke’ system has satellite ambulance response teams at key points on the edge of the urban area in close proximity to both densely populated areas and key highway networks. These response locations (Stand-By points) are located away from the Hub in a spoke-like manner and are positioned in locations where they can meet government response time targets at all times of the day.</li> <li>•City of York Council has created new settlements in the form of villages that sit outside the main urban area. These new settlements are not currently catered for in the ambulance service’s current response locations. These new settlements therefore generate a challenge for the ambulance service in responding to the Government target response times which cannot be met from the existing Hub and Spoke strategy that operates within the City of York.</li> <li>•The Yorkshire Ambulance Service request for those five large new stand-alone proposals (ST7, 8 , 9, 15 and 16) that specific text is included within each of those allocations to make provision for a spoke facility The spoke facility needs to be located in each of those strategic sites at a point with immediate access to the main highway network. The above needs to be clearly worded in each allocation and appropriately costed for in the work being undertaken by City of York Council on viability.</li> </ul>	
Local Plan Pre Publication Draft (Regulation 18 Consultation), September 2017		
ERC	<ul style="list-style-type: none"> <li>•The draft plan, which has been based on ongoing co-operation between the two authorities throughout the plan making process.</li> <li>•Strongly supports the provision of sufficient housing within the York Local Plan to enable</li> </ul>	

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	<p>the full need for housing to be met within the York HMA.</p> <ul style="list-style-type: none"> <li>• Welcomes the identification of strategic highways network improvements at Grimston Bar in policy T4 and the need for joint working.</li> <li>• Expressed concern at the Breen Belt boundary being set precisely at 6 miles from the city centre as this would encroach into East Riding.</li> <li>• More detailed comments relating to Site ST15 Land West of Elvington Lane.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy DP1 Amended to show Green Belt approx. 6 miles</li> </ul>
EA	<ul style="list-style-type: none"> <li>• On the whole, the Environment Agency's comments from previous consultations have been taken on board and the EA find the content of the plan positive. The section on green infrastructure is good and recognises the dual of both green open spaces and mitigation of current and future flood risk, as sustainable drainage systems (SuDS) or flood storage, can be achieved.</li> <li>• More detailed comments on policies relevant to its remit, e.g. Flood risk and land contamination.</li> </ul>	<ul style="list-style-type: none"> <li>• Relevant policies amended to suit as appropriate</li> </ul>
HDC	<ul style="list-style-type: none"> <li>• The document identifies sufficient land to meet the development needs of the City and establishes a Green Belt enduring 20 years. It does not safeguard land for development and recognises the build out time of the strategic sites will extend beyond the plan period. The proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed in the White Paper, should this be required.</li> <li>• If the City of York does not ensure that its longer term development needs are met this will place pressure on areas in neighbouring authorities.</li> <li>• The Local Plan has been subject to viability testing and the proposed allocations have been selected through a robust assessment process, but the level of assessment that has been undertaken to confirm the viability and deliverability of the allocated sites is</li> </ul>	



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	unclear	
HBC	<ul style="list-style-type: none"> <li>•No representation made at this stage but ongoing discussions under the Duty will continue as the plan is taken forward</li> </ul>	
HighE	<ul style="list-style-type: none"> <li>•Welcome the emphasis on sustainable travel, high quality public transport links serving new sustainable communities and travel planning as key components of policy, and that new development sites are located with good access to public transport, walking and cycling networks, thereby minimising growth in traffic.</li> <li>•The Plan lacks recognition of the scale of the forecast traffic growth on the A64 trunk road and its junctions with local primary roads will require physical mitigation in the form of investment in highway infrastructure despite the extensive sustainable travel proposals.</li> <li>•The spatial distribution and particularly the development of land opportunities in the south and eastern parts of York should be dependent upon agreement between the Council and HE of a Management Strategy for the A64 and its junctions with the local primary road network.</li> <li>•HighE expects that the strategic sites located around the A1237 Northern Ring Road will combine to have a significant impact on the junctions of the A1237 with that A64 east and west of York. It will need to have a good understanding of that cumulative impact if it is to be able to state that the Plan is sound at Publication Draft stage.</li> <li>•HighE will continue to work in partnership with CYC to understand the impact of the Local Plan proposals on the operation of the A64 and its junctions with the primary road network.</li> <li>•Requested that the key principles in many of the Spatial Strategy (SS) policies for the strategic sites be modified to include HighE as an organisation to be consulted with by developers when demonstrating that all transport issues have been addressed.</li> </ul>	<ul style="list-style-type: none"> <li>• Relevant SS Policies amended to suit where appropriate</li> </ul>

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HighE	<ul style="list-style-type: none"> <li>•Requested explanatory text to several Spatial Strategy (SS) policies for the strategic sites be modified to include the need for a Transport Assessment to support the key principles relating to demonstrating that all transport issues have been addressed.</li> <li>•Policy T4 should include a reference to the provision of a new junction on the A64 to provide the main access to strategic housing site ST15 Land West of Elvington Lane.</li> <li>•Policy T7 should be amended to state that transport assessments for strategic sites must identify impacts individually and cumulatively on the A64 and that mitigation must be agreed with Highways England</li> </ul>	<ul style="list-style-type: none"> <li>• Explanation text to relevant SS Policies amended to suit where appropriate</li> <li>• Policy T4 amended to include reference to the new access off A64</li> <li>• Policy T7 amended to suit</li> </ul>
Leeds City Region Local Enterprise Partnership (LCR LEP) / West Yorkshire Combined Authority (WYCA)	<ul style="list-style-type: none"> <li>•The Plan forms a complete suite of local policies and directly addresses many aspects of the strategies in the SEP.</li> <li>•Land allocations for the provision of jobs will support sustainable economic activity with a focus on allocating enough sites to satisfy market demand and maximise connectivity to transport</li> <li>•The Plan supports the aim of increasing the amount of energy generated from renewable and low carbon sources, and supports proposals for renewable and low carbon infrastructure. These elements are well-aligned with the SEP</li> <li>•York has not applied the 10% market signals adjustment as recommended in the York 2017 Strategic Housing Market Assessment.</li> <li>•The Plan policies could strengthen the commitment to delivering better digital infrastructure which would support the SEP priorities</li> </ul>	<ul style="list-style-type: none"> <li>• Policy C1 amended to include communications infrastructure in new developments</li> </ul>

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	<ul style="list-style-type: none"> <li>•Sites and policies are not supported by an up to date infrastructure delivery plan (IDP) and one would be expected.</li> <li>•The Plan acknowledges that commuting to destinations outside York occurs. Welcomes that improvements to York Railway Station are included in the plan to accommodate enhancements for the planned electrification of the Trans Pennine Line, HS2 and Northern Powerhouse Rail aspirations.</li> </ul>	
NYCC	<ul style="list-style-type: none"> <li>•York is an important driver for growth both within the York, North Yorkshire and East Riding LEP area and the Leeds City Region. It is important that the City has a robust and high quality Local Plan in place that best enables it to unlock economic growth and prosperity for the benefit of its communities and those of its wider hinterland.</li> <li>•Welcome the commitments set out in Policy DP1: York Sub Areas. In particular that York will 'fulfil its role as a key driver in the Leeds City Region , York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) area...' and 'The housing needs of City of York 's current and future population including that arising from economic and institutional growth is met within the York local authority area.'</li> <li>•Support the general thrust and intent of Policy SS1 : Delivering sustainable growth for York</li> <li>•Policy SS2: the Role of York's Green Belt - defining a clear and detailed inner boundary of the York Green Belt is welcomed and supported. In defining the Green Belt boundary it is important that the evidence underpinning the decision is clearly presented and included within the narrative accompanying the policy. NYCC recognise that the Plan makes provision up to 2038, providing for an additional 5 years beyond the plan period. In adopting this approach it is acknowledged that in the longer term consideration will need to be given to how future growth needs will be managed to provide confidence in relation to planning for infrastructure and services including within neighbouring parts of</li> </ul>	

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	<p>North Yorkshire</p> <ul style="list-style-type: none"> <li>•Any traffic impact on NYCC's local highway network that could arise from allocations need to be identified and considered. Where it is clear that a development will have a material impact on its local highway network, NYCC request to be included in agreeing the scoping for the Transport Assessment (TA) and Travel Plan (TP) in addition to being formally consulted during the application process.</li> <li>•Ask that within CYC's transport evidence account is taken of the traffic generated by the allocations of surrounding planning authorities, particularly Harrogate district and the Green Hammerton settlement and that committed developments within North Yorkshire that will impact on cross border issues are included.</li> <li>•The Development of the York Central site will provide new economic and residential uses and activity in the centre of the City in a location well connected to sustainable transport which will benefit from regeneration</li> <li>•Suggest that proposed developments should plan for the installation of equipment or suitable provision of ducting at the onset for mobile communications and not leave it to be installed by third parties once the development is complete.</li> </ul>	<ul style="list-style-type: none"> <li>• Policy T7 amended to include for strategic sites the impacts on neighbouring local highway authorities' (LHAs') highways and agree mitigation with HE and LHAs</li> <li>• Modelling takes this into account either through application of TEMPRO growth or bespoke traffic flow data as appropriate</li> <li>• Policy C1 amended to include new 'Communications Infrastructure in new developments' subsection .</li> </ul>
RDC	<ul style="list-style-type: none"> <li>•No representation made at this stage but ongoing discussions under the Duty will continue as the plan is taken forward</li> </ul>	

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SDC	<ul style="list-style-type: none"> <li>•Broadly supports the Local Plan approach and its policies, and more specifically, Policy DP1</li> <li>•SDC notes Policy SS1 states that the plan will deliver a minimum of 867 dwellings per year. Having read the SHMA Addendum, it is also noted that this figure does not take into account the level of employment growth proposed by the Local Plan and that the SHMA has not undertaken a full update to the analysis of economic growth. Whilst the SHMA concludes that there is unlikely to be any justification for an uplift in housing numbers in York to support expected growth in employment, Selby District Council need to be confident that undertaking a policy-on approach to housing need would identify no more than 867 dwellings per annum.</li> <li>•CYC will also be aware of the proposed methodology for the calculation of housing need requirements set out in the in the DCLG consultation on ‘Planning for the Right Homes in the Right Places’, which if taken forward would increase York’s housing requirement figure to 1,070 dwellings per annum. Whilst you are confident that you can realise the growth aspirations detailed within the Pre-Publication Local Plan within the City of York boundary, Selby District Council is concerned that any increases to this figure could raise significant cross-boundary issues.</li> <li>•Question whether a Green Belt boundary enduring for 20 years is sufficient to meet the NPPF as it pertains to the intended permanence of Green Belt boundaries in the long term so they are capable of enduring beyond the plan period.</li> <li>•Site ST15 is in a remote location and will require significant investment in public transport infrastructure. The cumulative impact of this proposed new settlement on the highways network, along with the proposed expansion of York University (Site ST27) and the employment allocation at Elvington Airfield will need to be mitigated. Selby District Council need more detail to that shown in the Transport Topic Paper, before providing any further comments on the potential impact this allocation may have on Selby district.</li> </ul>	

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Body	Representation	Outcome
	<ul style="list-style-type: none"> <li>•CYC as education authority, will need to be satisfied that Wheldrake with Thorganby CE School is capable of meeting any additional demand generated by Site ST33, without any detriment to the population of Thorganbury (in Selby District)</li> </ul>	<ul style="list-style-type: none"> <li>• Education contribution required to accommodate additional pupils at Wheldrake with Thorganby CE School</li> </ul>
York, North Yorkshire and East Riding Local Enterprise Partnership (YNYER LEP)	<ul style="list-style-type: none"> <li>•The quantum and nature of the proposed development will be of great strategic benefit to this LEP area and it is important that the Local Plan is advanced to adoption quickly to allow delivery of these sites.</li> <li>•Past issues of under delivery of housing, together with recent market signals for York mean that it will be essential to achieve the proposed minimum annual provision of 867 dwellings over the plan period, together with any additional homes to reflect under delivery.</li> <li>•Concerned at only 60,000m<sup>2</sup> of B1a office space at York Central, given the significantly higher figure in the EZ proposal and the pivotal role of such development on this site for the economy of York and the LEP area</li> <li>•Welcome the funding from WYCA to undertake feasibility and business case development for dualling the A1237</li> <li>•Grimston Bar junction, that already has capacity problems and faces increasing pressure through the Local Plan proposals, is important for east-west connectivity</li> </ul>	<ul style="list-style-type: none"> <li>• Employment (B1a) increased to 100,000m<sup>2</sup> in Policy SS4</li> </ul>

<b>Table 4.5 Index of discussions with Prescribed body or other organisation in preparing the City of York Local Plan</b>			
<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
Prior to consultation on Local Plan Preferred Options (LPPO)			
Director of Public Health, City of York Council.	Gather general information about the reorganisation of healthcare and public health	26/09/12	<ul style="list-style-type: none"> <li>• None</li> </ul>
East Coast	Discuss the strategic role of York Station	08/03/13	<ol style="list-style-type: none"> <li>1. Transport Modelling of Chantry Rise (the Fox PH) access into York Central</li> <li>2. Prepare specific policy for York Station in York Local Plan</li> </ol>
East Riding of Yorkshire Council (ERC)	Discuss traffic data for A1079 junctions at Dunnington	29/11/12	<ol style="list-style-type: none"> <li>1. Enquiries to be made with CYC traffic modelling team to establish turning counts etc. and status of junction improvement proposals.</li> </ol>
Highways Agency (HA) & North Yorkshire County Council (NYCC)	Investigate how the respective body's transport model can be better integrated with those of the other bodies to assess the impacts of proposed development along the A64	27/11/12	<ol style="list-style-type: none"> <li>1 Investigate various issues around modelling should the need arise following initial comparison of model outputs</li> <li>2 Determine whether NYCC's consultant is to undertake any further work to integrate NYCC's county-wide and local models</li> </ol>
HA & ERC	<ul style="list-style-type: none"> <li>• Discuss A64 Grimston Bar junction</li> </ul>	21/05/13	<ol style="list-style-type: none"> <li>1 Discuss progress on University of York S278 works with CYC Network Management.</li> <li>2 Discuss the optimum position for 'loading' a large residential site (potential CYC LP allocation) to the SE of the A64 onto the A64 with CYC's modelling team</li> <li>3 Discuss the emerging/new HA policy for development along the A64 with HA</li> </ol>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
HA	<ul style="list-style-type: none"> <li>• Discuss HA's view of new large scale residential development adjacent to the A64</li> </ul>	21/03/13	<ul style="list-style-type: none"> <li>• None</li> </ul>
NYCC and North York Moors National Park Authority (NYMPA)	<ul style="list-style-type: none"> <li>• North Yorkshire, York and North York Moors Minerals and Waste Joint Plan (JMWP) officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> </ul>	05/12/12  09/01/13 16/01/13 22/01/13 17/04/13 14/05/13 20/05/13	Work/actions necessary to prepare a Joint plan
During consultation on LPPO			
ERC	Discuss cross boundary issues prior to Local Government North Yorkshire and York (LGNYY) Spatial Planning and Transport Board (also on 02/07/13) and prior to ERC sending consultation response	02/07/13	1. Provide ERC with information in response to Issues 1-4 ASAP 2. Consider rephrasing paragraph referred to in Issue 5 to provide more coordinated policy with ERC. 3. Investigate Issues 6 and 7
Harrogate Borough Council (HBC)	Discuss cross boundary issues	24/07/13	1 Keep under review in respective DtC matrices
HA	Further discussion of growth targets in the plan, the potential impacts on the A64 and potential mitigation measures..	29/07/13	1 HA to have more regular meetings and with CoYC and involvement in the process as work on the Plan continues.
Leeds and York Partnership NHS Trust	General information, discussion regarding infrastructure needs and request for consultation feedback	24/07/13	1 Changes to Policy CF4 required, where it relates to Bootham Park.



<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
LGNYY Spatial Planning and Transport Technical Officers Group (TOG), Extraordinary meeting	Round table discussion to discuss CoYC's compliance with the DtC in preparing the Local plan Preferred Options, general information, discussion and request for consultation feedback.	31/07/13	<ol style="list-style-type: none"> <li>1 Next steps / Joint working opportunities to next meeting</li> <li>2 Next TOG meeting to be arranged for 4-6 weeks time and Highways Agency (HA) to be invited to attend</li> <li>3 HA response to CYC Local Plan Preferred Options to be circulated</li> <li>4 Future evidence to be gathered on a sub regional basis, as required.</li> </ol>
North Yorkshire Police	General information, discussion regarding infrastructure needs and request for consultation feedback	28/06/13	<ul style="list-style-type: none"> <li>• Liaise with the Architectural Liaison Officer re. Gypsies and Travellers</li> </ul>
Selby District Council (SDC)	Discuss cross boundary issues	08/07/13	<ol style="list-style-type: none"> <li>1 Advise SDC as to why Site ST15 is proposed where it is and not elsewhere</li> <li>2 Advise SDC as to why SF7 has a proposed leisure allocation</li> </ol>
Stakeholder Workshop	Delivering Strategic Sites, facilitated by Atlas	04/07/13	
Without Walls (WoW) Board	General information / presentation of Local Plan Preferred Options, Q & A and request for consultation feedback	26/06/13	<ul style="list-style-type: none"> <li>• Liaise with each Partnership Support Officer</li> </ul>
Yorkshire Water (YW)	General information, discussion regarding infrastructure needs and request for consultation feedback	10/07/13	<ul style="list-style-type: none"> <li>• Make enquiries regarding 'Headroom' in Elvington and find out whether anything is included in YW's Periodic Review 14</li> </ul>
York Teaching Hospital NHS Foundation Trust (via email).	The need to modernise York District Hospital over the next few years	29/07/13	<ul style="list-style-type: none"> <li>• None</li> </ul>

<b>Table 4.5 Index of discussions with Prescribed body or other organisation in preparing the City of York Local Plan</b>			
<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
During 2 week extension to consultation period			
HA & ERC	Discuss further growth impacts on A64 (in particular Grimston Bar junction) and potential mitigation measures.	09/08/13	<ol style="list-style-type: none"> <li>1 Discuss (internally) whether possible to release WSP's trip generation note [for Whinthorpe] to ERC</li> <li>2 ERC to reassess trip rates generated by development in Pocklington</li> </ol>
Post LPPO			
HA	Discuss progress on devising a more sustainable approach to development of strategic sites to minimise impacts on the A64 and coordinate with HA's new transport model for the A64 around York	23/09/13	<ul style="list-style-type: none"> <li>• For any issues relating to the Dynameq modelling contact EY at JMP (cc AS (JMP) / SJ (Highways Agency)) and for any issues relating to transport strategy contact AS/SJ (cc EY)</li> </ul>
Environment Agency (EA)	to discuss EA response to LPPO, with particular focus the Water Framework Directive and Flood Risk	30/09/13	<ol style="list-style-type: none"> <li>1 Review EA's representation and amend Local Plan and supporting documents as appropriate</li> <li>2 Consider flood risk, water environment and biodiversity as 'strategic issues' under the Duty to Cooperate</li> <li>3 EA to send through examples of how other local authorities have incorporated the WFD into their local plans.</li> <li>4 EA to send relevant and contemporary information from EA's database of reasons for failure to CoYC (AC)</li> <li>5 EA to liaise with CoYC (AC) to ensure supply of contemporary information for updating the Local Plan Sustainability Appraisal</li> </ol>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
Planning Advisory Service commissioned DtC Workshop 1	Facilitated by ARUP to deliver the 'Incorporating Strategic Issues into Local Plans' module. The workshop was attended by representatives from neighbouring local authorities, HA, LEPs and Network Rail. The focus of this workshop was 'Identifying Strategic Issues'	24/10/13	
Department for Transport (DfT) Rail and NYCC	Discuss various rail planning and scheme delivery issues, including: Haxby Station, York Station (+HS2), York-Harrogate-Leeds line, Access to Leeds Bradford International Airport (LBIA), Rail Devolution and Re-Franchising.	31/10/13	<ul style="list-style-type: none"> <li>DfT to forward details of an appropriate (DfT?) contact for York Station</li> </ul>
Delivering Strategic Sites-Panel Review Workshops –	Presentations by developer design teams to a 'Design and Environment Panel' and an 'Infrastructure Panel', both comprising representatives of various CoYC departments and numerous statutory/prescribed bodies, to inform the panels of the scope and scale of the proposed development and offer the opportunity for the panel to ask questions and provide appropriate guidance to the design teams. - (overview and write-up available)	06/11/13, 13/11/13 and 15/11/13	
HA	to discuss assumptions (e.g. trip generation rates) used for modelling the local traffic impacts of the proposed allocations and the cumulative impacts of development in York overall. Also to discuss the tie-in with HA's modelling of the A64 around York.	18/11/13	<ol style="list-style-type: none"> <li>JMP (EY) to liaise with CYC (SP) re coordination and integration of CYC / HA traffic models.</li> <li>Liaise with East Riding Council (ERC) regarding progress on identifying the traffic impacts of ERC's Local Plan at Grimston Bar junction</li> </ol>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
Local Plan Viability Workshop	Presentation by Peter Brett Associates to strategic site developer design teams, representatives from COYC and other statutory/prescribed bodies such as the HA to give an overview of local plan site viability work, including assumptions made, and provide the opportunity for feedback. This was followed by a broadly similar presentation by Parsons Brinckerhoff to outline the work being undertaken on the Local Plan Transport Infrastructure Investment Requirements study	22/11/13	
HA	to discuss assumptions (e.g. trip generation rates) used for modelling the local traffic impacts of the proposed allocations and the cumulative impacts of development in York overall, with a particular focus on devising/using trip rates that are more in accord with HA's trip rates derived through its GraHAM tool, as HA had written to express its concerns regarding the trip rates used in CoYC's latest modelling.	16/12/13	<ul style="list-style-type: none"> <li>• None</li> </ul>
Planning Advisory Service commissioned DtC Workshop 2	Facilitated by ARUP to deliver the 'Incorporating Strategic Issues into Local Plans' module. The workshop was attended by representatives from neighbouring local authorities, HA, LEPs and Network Rail. This workshop discussed toolkits (tables) as means to identify evidence gaps, strategic (DtC) issues and undertake actions to produce better outcomes	20/01/14	

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
HA	<p>To discuss:</p> <ul style="list-style-type: none"> <li>• CoYC latest modelling outputs and HA's initial modelling outputs</li> <li>• The impacts of new sites proposed in representations on the Local Plan Preferred Options consultation</li> <li>• How CoYC will consider planning applications for strategic sites in advance of the adoption of a Local Plan</li> <li>• Timescales for preparing and adopting the City of York Local Plan</li> </ul>	31/01/14	<ol style="list-style-type: none"> <li>1 CYC to ascertain traffic flows on A59 arising from local Plan growth to assess impact on A1M Junction 47 and discuss potential mitigation with HA and NYCC.</li> <li>2 CYC meet with developers of strategic sites, together with the HA, as and when appropriate</li> <li>3 CYC / HA to agree traffic flows coming off the north end of the A1237 onto the A64, (more modelling work required before this can be done)</li> <li>4 Ascertain whether a CYC 'constrained trip matrix' is available for JMP to use</li> </ol>
HA, NYCC, Ryedale District Council (RDC) and Scarborough Borough Council (SBC)	to discuss HA Route-Based Strategies Risk Register to demonstrate closer involvement with the HA for Priority schemes that impact on the Strategic Road Network (SRN) and develop an action plan.	25/02/14	<ul style="list-style-type: none"> <li>• CYC to ascertain traffic flows on A59 arising from local Plan growth and forward to NYCC (PJ).</li> </ul>
NYCC and NYMPA	<ul style="list-style-type: none"> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> </ul>	<p>21/10/13 06/11/13 08/01/14 20/01/14</p>	<ul style="list-style-type: none"> <li>• Work/actions necessary to prepare a Joint plan</li> </ul>
Pre-Submission (Publication, 2014) including Further Sites Consultation			
Authorities that form part of York's Sub-Area	Discuss York's housing market area, with a focus on either confirming current assumptions or identifying any changes to what has already been assumed.	17/03/14	

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
HA and Systra	Discuss the potential for third party use of CoYC' strategic transport model to model various access options to a proposed major development site adjacent to the SRN.	03/04/14	<ul style="list-style-type: none"> <li>• CYC / Parsons Brinckerhoff need to agree how to proceed (i.e. whether to allow use of the CYC transport model by the developers transport consultant</li> </ul>
HA, NYCC the York North Yorkshire and East riding Local Enterprise Partnership and JMP	Discuss the HA's feasibility study for improvements to the A64 under the HA's Route Strategy programme	15/08/14	<ol style="list-style-type: none"> <li>1 Determine whether CYC Local Plan trajectory can be sent to JMP ccd to the HA.</li> <li>2 Check and confirm no. of dwellings South of Cayton in SBC consultation (4500) and advise JMP</li> </ol>
HA, JMP and ERC	Discuss the harmonisation of CoYC's and HA's transport models and how the outcomes of these show the transport impacts of CoYC's and ERC's Local Plans on the A64 and its junctions, particularly the Grimston Bar junction.	19/08/14	<ul style="list-style-type: none"> <li>• Send latest trip matrices to JMP.</li> </ul>
Harrogate District Core Strategy Review - Transport Workshop.	<p>Establish:</p> <ol style="list-style-type: none"> <li>1. What are the key transport constraints and opportunities for delivering the infrastructure required to support new homes and jobs up to 2035?</li> <li>2. Broadly what future development options should be investigated and why?</li> <li>3. What transport evidence base work is required to support future development options?</li> <li>4. How can we ensure that the transport infrastructure necessary to support development is funded?</li> </ol>	09/04/14	

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
NYCC	General discussion following the issue of the City of York Council Local Plan Further Sites Consultation on 4 June 2014, with primary focus on transport.	10/06/14	<ol style="list-style-type: none"> <li>1 Resend traffic flows on A59 arising from CYC Local Plan to NYCC (PJ and MB), the Highways Agency (SJ) and its consultant JMP (AS)</li> <li>2 SW (CYC) to liaise with MY (NYCC) regarding flooding outside York's boundaries.</li> </ol>
NYCC and NYMPA	<ul style="list-style-type: none"> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> <li>• JMWP officer meeting.</li> </ul>	05/03/14 12/03/14 06/05/14 27/05/14 16/07/14 04/08/14 30/09/14	<ul style="list-style-type: none"> <li>• Work/actions necessary to prepare a Joint plan</li> </ul>
SDC	Discuss joint approach to setting allocations in Escrick	30/06/14	<ul style="list-style-type: none"> <li>• Meeting to be arranged between CYC Portfolio Holder Environmental Services, Planning &amp; Sustainability and NYCC Lead Member for Place-shaping to discuss at a 'political level'.</li> </ul>
Pre-Preferred Sites Consultation			
ERC	Community Infrastructure Levy (CIL) viability workshop to test/query assumptions used in CIL viability assessment	14/09/15	
HA	Discuss the impacts of the city of York local plan on the A64	08/10/14	<ul style="list-style-type: none"> <li>• Send latest 'full-dualling' cordon data, plus 'unmitigated' data to JMP.</li> </ul>
Hambleton district Council (HDC)	For CoYC to inform HDC of the latest position regarding its Local Plan and vice versa and discuss potential cross-boundary issues.	11/05/15	<ul style="list-style-type: none"> <li>• Forward Hambleton-York travel to work movements as extracted from 2011 Census data</li> </ul>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
Hambleton district Council (HDC)	CoYC to inform HDC of the latest position regarding its Local Plan and vice-versa and discuss potential cross-boundary issues.	11/05/16	<ul style="list-style-type: none"> <li>Forward CYC's draft community infrastructure standards matrix</li> </ul>
Hambleton district Council (HDC)	Retail and Leisure Study Workshop to provide a general update on the Hambleton Retail and Leisure Study which will feed-in to HDC's Local Plan Preferred Options Document	24/05/16	
HBC	Written comments offered by CYC on Harrogate BC's emerging Strategic Housing Market Assessment.	22/01/15	
	Further written comments offered by CoYC, on the assumptions in the draft SHMA about commuting flows between York and Harrogate	03/02/15	
	(with Atkins acting on behalf of HBC) Written comments offered by CYC on Atkins' Draft analysis of the Harrogate Functional Economic Area.	05/02/15	
	Discuss the issues that will inform CYC's response to Harrogate BC's Harrogate District Local Plan: Issues and Options Consultation.	27/07/15	<ol style="list-style-type: none"> <li>CYC to send in a representation on Harrogate District Local Plan: Issues and Options Consultation</li> <li>CYC to dovetail its Local Plan work with HBC as each authority's respective plans are progressed.</li> </ol>
	Community Infrastructure Levy (CIL) and Local Plan viability workshop to test/query assumptions used in CIL /LP viability assessment	28/06/16	
Highways England (HighE)	Regional Stakeholder Briefing to inform stakeholders about HighE, its 5-year strategy, investment plan and work programme for the Yorkshire and North-East region.	21/07/15	



<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
NYCC and NYMPA	JMWP Member Working Group Meeting JMWP officer meeting. JMWP Member Working Group Meeting JMWJP officer meeting JMWJP Member Working group meeting	11/11/14 02/12/14 23/01/15 23/02/15 24/03/15	<ul style="list-style-type: none"> <li>• Work/actions necessary to prepare a Joint plan</li> </ul>
NHS	Discuss S106 contributions for Strategic site ST1 and wider discussion on future NHS infrastructure/service provision requirements.	24/02/15	<ul style="list-style-type: none"> <li>• NHS team to undertake an audit of its current healthcare provision and the ability of existing practices to accommodate additional demand for premises. This would inform an assessment of potential provision-gaps arising from the policies and site allocations in the Local Plan Publication Draft</li> </ul>
	Present latest position on the Local Plan and discuss future NHS infrastructure / service provision requirements.	07/04/15	<ol style="list-style-type: none"> <li>1 CYC to send relevant extracts of the Plan, (Key Diagram and housing nos. for each strategic site), to NHS for them to offer comment.</li> <li>2 NHS to undertake a gap-analysis of current healthcare provision once the above information has been received.</li> <li>3 NHS to forward relevant and appropriate information regarding the York Hospital Masterplan to CYC</li> <li>4 CYC to arrange further quarterly meeting</li> <li>5 CYC to meet with CCG once contact details have been supplied by NHS</li> </ol>
	Discuss future NHS infrastructure / service provision requirements.	03/06/15	<ol style="list-style-type: none"> <li>1 Investigate NHS guidelines for GP provision)</li> <li>2 Prepare a map of all healthcare facilities.</li> </ol>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
NHS	Present the latest position on the Local Plan, discuss progress on actions from meeting on 24/02/15, and determine future actions.	30/07/15	<ol style="list-style-type: none"> <li>1 NHS to forward York Primary care property dataset to CYC</li> <li>2 NHS to forward optom., dental and pharmacy premises info to CYC so it has a full picture of the primary care estate</li> <li>3 CYC to prepare suitable Mapping using dataset received</li> <li>4 CYC to check receipt of York Hospital Masterplan and NHS resend if necessary</li> <li>5 CYC arrange a meeting between NHS and CYC Development Management team</li> <li>6 CYC /NHS to pursue Workshop for York Hospital Masterplan (CYC to check 'fit' with Local Plan preparation timescale)</li> <li>7 NHS to search for York Hospital Catchment Plan and forward to CYC</li> </ol>
Ryedale District Council (RDC)	CYC to inform RDC of the latest position regarding the City of York Local Plan, and to request a response from RDC with regard to whether it would consider absorbing some of CYC's housing requirement within its local authority area.	15/01/15	
	CoYC and RDC to update each other of the latest position regarding their respective local plans and discuss cross-boundary issues	10/12/15	<ol style="list-style-type: none"> <li>1 Confirm whether opportunity for RDC to observe or piggy-back CYC's work updating Gypsy and Traveller evidence to be taken-up</li> <li>2 RDC to liaise with CYC regarding potential peer-to-peer support / advice in undertaking SA/SEA work</li> </ol>

**Table 4.5 Index of discussions with Prescribed body or other organisation in preparing the City of York Local Plan**

Prescribed body (or other organisation)	Purpose / Topic	Date(s)	Action / Outcome
SDC	CoYC To update SDC re. the CYC Local Plan, understand the current position re. the SDC Local Plan, and discuss the proposed allocation(s) in Escrick.	12/01/15	<ul style="list-style-type: none"> <li>• SDC to seek to issue a Member (Portfolio Holder)-backed view on the allocation of land North of Escrick within the next two weeks..</li> </ul>
	CoYC and SDC to update each other of the latest position regarding their respective local plans and discuss cross-boundary cooperation with regard to allocations in Escrick and adopting a more sub-regional approach to delivering housing in the York Housing Market Area.	10/09/15	<ul style="list-style-type: none"> <li>• CYC to arrange a series of further meetings to discuss allocations in Escrick</li> </ul>
	CoYC and SDC to update each other of the latest position regarding their respective local plans and discuss cross-boundary cooperation with regard to allocations in Escrick.	21/04/16	<ol style="list-style-type: none"> <li>1 SDC to offer its view on CYC de-allocating a site in Escrick for residential development and allocating it as Green Belt</li> <li>2 SDC to reply to CYC letter drafted 09/02/16</li> <li>3 CYC / SDC to identify areas of work and their respective timescales where the potential for cross-boundary cross-over exists</li> </ol>
West Yorkshire Plus Transport Fund Partners and HE	Workshop to share ambitions, visions and objectives to maximise efficiency and prevent abortive work	22/06/15	
York North Yorkshire and East Riding (YNYER ) Local Enterprise Partnership (LEP) Area	Transport Meeting for discussion around developing a prioritisation methodology for major transport schemes across the York/North Yorkshire and East Riding area.	01/02/16	

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
York, North Yorkshire and East Riding Transport Body	Meeting to establish the (transport) infrastructure investment priorities across the YNYER area.	28/09/15	
YW	Confirm that there are not likely to be any water supply or waste water treatment 'showstoppers', establish Yorkshire Water's infrastructure investment plans, and discuss specific issues raised by Haxby Town Council	04/02/15	<ol style="list-style-type: none"> <li>1 CYC to amend the City of York Local Plan Infrastructure Delivery Plan (IDP) paragraph 4.88 to read 'limited capacity at Rawcliffe'. Also to check which version of the IDP is the most up to date and amend the appropriate paragraph, if not Paragraph 4.88.</li> <li>2 CYC to update IDP to include AMP6 instead of AMP5</li> </ol>
Preferred Sites Consultation (PSC)			
ERC	Discuss City of York Local Plan Preferred Sites Consultation Document and potential cross-boundary issues.	26/07/16	<ul style="list-style-type: none"> <li>• ERC to forward to CYC Highways England's revised response to ERC Local Plan Allocations Document</li> </ul>
The Environment Agency (EA)	Discuss potential flood alleviation schemes	01/09/16	<ol style="list-style-type: none"> <li>1 EA to share new flood zones with CYC in mid-September ahead of full issue?</li> <li>2 CYC to arrange further meeting with EA for end of September / early October 2016</li> <li>3 CYC to set up a meeting with the York Central Project Team for early October 2016</li> </ol>
HBC	CoYC and HBC to update each other of the latest position regarding their respective local plans and discuss cross-boundary issues. Also discuss the need for HBC to be consulted on the Poppleton Neighbourhood Plan HRA.	25/04/17	

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
HE	Discuss City of York Local Plan Preferred Sites Consultation (PSC) Document and strategic issues	18/07/16	<ol style="list-style-type: none"> <li>1 CYC to prepare a project plan for transport modelling / viability testing and issue to HE</li> <li>2 CYC to liaise with HE's consultant</li> <li>3 HE to offer feedback on Local Plan Preferred Sites Consultation document</li> </ol>
NYCC	Discuss City of York Local Plan PSC Document and potential cross-boundary issues.	31/08/16	<ul style="list-style-type: none"> <li>• None</li> </ul>
SDC	Discuss City of York Local Plan PSC Document and potential cross-boundary issues.	29/09/16	<ol style="list-style-type: none"> <li>1 CYC to arrange further meeting With SDC at SDC's offices to take place ASAP</li> <li>2 SDC to forward to CYC SDC's timetable for preparing Plan Selby</li> <li>3 CYC to review SDC Economic Strategy and offer comment to SDC ASAP</li> </ol>
(YNYER LEP)	LEP-chaired workshop to enable CYC's officers to receive / discuss views from the officers attending representing prescribed bodies to help CYC show that cooperation under the duty can or will lead to improved outcomes as the CYC Local Plan progresses from 'Preferred Sites' to 'Publication Draft'. (detailed notes available)	13/10/16	<ul style="list-style-type: none"> <li>• All agreed that this workshop had been useful</li> <li>• Action CYC / LEP to arrange 2nd workshop (with additional specialist officers as necessary) specifically to discuss infrastructure should take place in 4-5 weeks time. The LEP agreed to host it (Feedback on the YNYER Spatial Framework was requested for this 2<sup>nd</sup> workshop)</li> </ul>
YW	Confirm that there are not likely to be any water supply or waste water treatment 'showstoppers' and discuss Yorkshire Water's infrastructure investment plans.	12/08/16	<ul style="list-style-type: none"> <li>• None</li> </ul>

**Table 4.5 Index of discussions with Prescribed body or other organisation in preparing the City of York Local Plan**

Prescribed body (or other organisation)	Purpose / Topic	Date(s)	Action / Outcome
Pre-Publication draft Local Plan (Regulation 18 Consultation, Sept 2017)			
HDC	<ol style="list-style-type: none"> <li>1 For CYC to inform HDC with regard to the York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC)</li> <li>2 For HDC to inform CYC with regard to the position on the Hambleton District Local Plan (HDLP)</li> <li>3 To identify any strategic cross boundary issues</li> </ol>	25/10/17	<ul style="list-style-type: none"> <li>• CYC advised HDC that sufficient land is allocated in the PPDRC for residential development to meet the OAN of 867 dwellings per annum (+ 56 dpa for backlog) wholly within the York unitary authority area.</li> <li>• Expected date of HDLP Publication is April 2018</li> <li>• CYC to send HDC an electronic (MS Word) version of the Leeds City Region Statement of Cooperation for Local Planning</li> </ul>
HighE	<p>To discuss:</p> <ul style="list-style-type: none"> <li>• CoYC York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC)</li> <li>• The impacts of the PPDRC on the Strategic Road Network (Primarily the A64)</li> <li>• A new Junction on the A64 to provide access to Strategic Site ST15</li> </ul>	03/10/17	<ul style="list-style-type: none"> <li>• HighE is generally more concerned about the impacts on A64 junctions than on the A64 main line</li> <li>• HighE has agreed in principle to site ST15 being accessed of the A64 via a new GSJ on the A64, the build-costs of which will not be met by HighE</li> <li>• If the new GSJ provides an additional route in to York, CYC to inform HE of what the forecast impacts on the A64 will be.</li> </ul>
Leeds City Region (LCR) LEP	For CYC to discuss the York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC)	27/10/17	<ul style="list-style-type: none"> <li>• Main Policies that may be of particular interest to LCR LEP (with due regard to the Proposals Map) are               <ul style="list-style-type: none"> <li>o Policy H1: Housing Allocations together with the associated Spatial Strategy policies that relate to the strategic sites and contain the key planning principles pertaining to them</li> <li>o Policy EC1: Provision of Employment Land</li> </ul> </li> <li>• No agreed actions arising</li> </ul>

**Table 4.5 Index of discussions with Prescribed body or other organisation in preparing the City of York Local Plan**

Prescribed body (or other organisation)	Purpose / Topic	Date(s)	Action / Outcome
SDC	<ol style="list-style-type: none"> <li>1 For CYC to inform SDC with regard to the York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC)</li> <li>2 For SDC to inform CYC with regard to the position on the Selby Local Plan</li> <li>3 To identify any strategic cross boundary issues</li> </ol>	17/10/17	<ul style="list-style-type: none"> <li>• CYC advised SDC that with regard to the proposed approach to calculating the local housing need in the Government’s ‘Planning for the right homes in the right places: consultation proposals’ it is ‘sticking to its guns’ in relation to its objectively assessed housing need (OAN) figure of 867 dwellings per annum (+56 dpa for backlog)</li> <li>• SDC was progressing a Sites and Policies Plan in 2016, but SDC has since made a decision to separate this into two documents as well as undertaking a Local Plan review, as stated in its 6th LDS 2017-2020               <ul style="list-style-type: none"> <li>o Site Allocations Plan (SAP);</li> <li>o Followed by the Development Management Policies Plan;</li> <li>o Followed by an early review of the Local Plan</li> </ul> </li> <li>• CYC to check whether symbols for denoting Park &amp; Ride sites on Proposals Map are correct</li> </ul>
YNYER LEP		24/10/17	<ul style="list-style-type: none"> <li>• YNYER LEP areas of interest               <ul style="list-style-type: none"> <li>o York is the largest centre in the LEP area and a major economic asset. It is in an important entity in its own right and exerts an influence over much the of LEP area. It has strengths and weaknesses and special character presents challenges for accommodating growth.</li> <li>o The quantum and nature of the proposed development in the PPDRC will be of great strategic benefit to this LEP area</li> <li>o CYC’s position in the PPDRC with regard to the</li> </ul> </li> </ul>

**Table 4.5 Index of discussions with Prescribed body or other organisation in preparing the City of York Local Plan**

Prescribed body (or other organisation)	Purpose / Topic	Date(s)	Action / Outcome
			<p>proposed approach to calculating the local housing need in the Government's 'Planning for the right homes in the right places: consultation proposals' - CYC is 'sticking to its guns' in relation to its (OAN) figure of 867 dwellings per annum (+56 dpa for backlog)</p> <ul style="list-style-type: none"> <li>○ The planned target of only 61,000 m2 of B1a office space at York Central is a concern, given the significantly higher figure in the EZ proposal and the pivotal role of such development on this site for the economy of York and the LEP area</li> <li>○ Upgrading (dualling) of the A12327 and having adequate capacity at the Grimston Bar junction are important in relation to east-west connectivity.</li> <li>● CYC to discuss impacts on A64 Grimston Bar Junction and potential mitigation with East Riding of Yorkshire Council (ERC) and Highways England (HighE).</li> </ul>
YW	<ol style="list-style-type: none"> <li>1 For CYC to update YW with regard to the City of York Local Plan Pre Publication Draft (Regulation 18) Consultation, September 2017 (PPDRC)</li> <li>2 To identify any strategic water and waste water issues</li> </ol>	26/10/17	<ul style="list-style-type: none"> <li>● YW advised CYC that waste water (WW) connections could impose significant infrastructure costs on some of the strategic sites (e.g. ST14 and ST15)</li> <li>● SW suggested Policy ENV5 be amended to limit run off to no more than 70% of existing rate (i.e. achieve a 30% reduction in runoff as a minimum).</li> <li>● CYC to provide YW with an indicative timescale for the build out of employment land</li> <li>● YW to confirm whether developers/promoters for site ST15 have approached it in relation to undertaking a</li> </ul>



<b>Table 4.5 Index of discussions with Prescribed body or other organisation in preparing the City of York Local Plan</b>			
<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
			more detailed examination of options to optimise WW treatment and advise CYC accordingly.
Local Plan Publication Draft, February 2018 (Regulation 19 Consultation)			
EA	To discuss whether the CoYC York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) (PDRC) has sufficiently taken EA's representations to the Pre-Publication Draft (Regulation 18 Consultation), 2017 (PPDRC) into account	15/03/18	<ul style="list-style-type: none"> <li>• EA advised               <ul style="list-style-type: none"> <li>○ of changes to allocations</li> <li>○ housing target remains the same</li> </ul> </li> <li>• Acknowledgement by EA that changes had been made to some policies in response to representations made</li> <li>• Likely that some further changes will be required (e.g. Policy ED5, specifically SH1)</li> </ul>
ERC	To discuss the City of York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) (PDRC) prior to ERC finalising and submitting its representation to it.	03/04/18	<ul style="list-style-type: none"> <li>• ERC advised               <ul style="list-style-type: none"> <li>• of changes to allocations</li> <li>• housing target remains the same</li> </ul> </li> <li>• ERC is supportive of the York Local Plan, in particular the strategy focused on meeting housing needs which should help to support the most sustainable pattern of development.</li> <li>• Subject to the provision of additional evidence to confirm the deliverability of ST15, ERC would not seek to be involved in the examination of the Plan</li> </ul>
HighE	To discuss: <ul style="list-style-type: none"> <li>• CYC York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) (PDRC)</li> <li>• The impacts of the PDRC on the Strategic</li> </ul>	20/02/18	<ul style="list-style-type: none"> <li>• HighE advised               <ul style="list-style-type: none"> <li>• of changes to allocations</li> <li>• housing target remains the same</li> </ul> </li> <li>• Acknowledgement by HighE that changes had been made to some policies in response to its</li> </ul>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
	Road Network (Primarily the A64)		<ul style="list-style-type: none"> <li>• Representation to the PPDRC</li> <li>• ‘Improvements to the A64/A1079/A166 Grimston Bar junction’ is still in the plan as a scheme to be delivered in the medium term 2022/23-2027/29 and that further modelling of this junction and potential improvements to it will be necessary.</li> </ul>
Historic England (HistE)	To discuss CoYC York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) (PDRC) prior to Hist. Eng. finalising its representation.	28/02/18 28/03/18	<ul style="list-style-type: none"> <li>• HistE advised <ul style="list-style-type: none"> <li>○ of changes to allocations</li> <li>○ housing target remains the same</li> <li>○ that changes had been made to some policies in response to representations made</li> </ul> </li> </ul>
NYCC	To discuss CYC York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) (PDRC)	16/03/18	<ul style="list-style-type: none"> <li>• NYCC advised <ul style="list-style-type: none"> <li>○ of changes to allocations</li> <li>○ housing target remains the same</li> <li>○ the Plan seeks to set a 20-yr. enduring Green Belt over the plan period and five years beyond, and allocations provide sufficient land to meet the longer-term</li> </ul> </li> <li>• Acknowledgement by NYCC that changes had been made to some policies in response to its Representation to the PPDRC</li> <li>• The main cross-boundary strategic issues concerning North Yorkshire relate to following matters: <ul style="list-style-type: none"> <li>○ Housing Figures - noted that CYC’s SHMA is a comprehensive piece of work.</li> <li>○ transport issues <ul style="list-style-type: none"> <li>▪ East-West connectivity (i.e. A59 / A1237 / A64 / A1079) – Site ST19 Northminster Business Park could have an impact on the A59 /</li> </ul> </li> </ul> </li> </ul>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
			A1237. Also NYCC / Harrogate BC are exploring 'futureproofing' options for the A59 <ul style="list-style-type: none"> <li>North-south movement/connectivity (principally the A19)</li> </ul>
RDC	To discuss the latest position regarding the Ryedale Local Plan Sites Document, and the City of York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) (PDRC)	26/03/18	<ul style="list-style-type: none"> <li>RDC updated CYC with regard to the Ryedale Local Plan Sites Document (LPSD)</li> <li>RDC advised <ul style="list-style-type: none"> <li>of changes to allocations</li> <li>housing target remains the same</li> </ul> </li> <li>RDC commented on the strategic benefit of the residential allocations (strategic sites) in the north and north-east of York.</li> </ul>
SDC	To discuss the latest position regarding the Selby Site Allocation Plan, and the City of York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) (PDRC)	22/03/18	<ul style="list-style-type: none"> <li>SDC updated CYC with regard to the Plan Selby Site Allocations Plan</li> <li>SDC advised <ul style="list-style-type: none"> <li>of changes to allocations</li> <li>housing target remains the same</li> <li>that changes had been made to some policies in response to representations made</li> </ul> </li> <li>SDC reiterated its concerns, as expressed in its representation to the PPDRC, regarding the OAN figure and the impact on SDC if ultimately a higher housing figure is to be delivered, remain.</li> <li>Not clear what advantages specific statements of common ground between CYC and SDC would achieve, over and above the measures / processes already undertaken, such as the DtC Matrix.</li> </ul>

<b>Prescribed body (or other organisation)</b>	<b>Purpose / Topic</b>	<b>Date(s)</b>	<b>Action / Outcome</b>
YNYER LEP		21/03/18	<ul style="list-style-type: none"> <li>• YNYER LEP advised               <ul style="list-style-type: none"> <li>○ of changes to allocations</li> <li>○ housing target remains the same</li> <li>○ that changes had been made to some policies in response to representations made</li> </ul> </li> <li>• YNYER LEP noted that the employment figure for Site ST5 has increased to 100,000m<sup>2</sup> which is in accordance with that stated for the Enterprise Zone.</li> </ul>

**Notes**

- 1 This table excludes regular sub-regional or sub-area meetings, and meetings for specific projects, where formal minutes or notes are otherwise available, as follows:
  - Leeds City Region (LCR) Strategic Planning Duty to Cooperate Group
  - LCR Community Infrastructure Working Group
  - Local Government North Yorkshire and York (LGNYY) Spatial Planning and Transport Board
  - LGNYY Spatial Planning and Transport Technical Officers Group (TOG)
  - York Sub-area Joint Infrastructure Working Forum (YSAJIWF)
  - North Yorkshire and York Local Nature Partnership Board
  - North Yorkshire Development Plans Forum
  - East Coast Mainline Authorities group (ECMA)
  - ECMA Technical Officers Group
  - Rail North (potential Rail Franchisor under decentralisation)
  - Business Case for improving the York-Harrogate-Leeds line
  - TransPennine Electrification
  - Asset Board
  - A64 Officer's Group
- 2 This table excludes meetings between CoYC and developer design teams for the Strategic Sites.

4.41 In addition to the formal and informal routes for cooperating with prescribed bodies and other organisations, as contained in Table 4.1, Table 4.3, Table 4.4 and Table 4.5, links to the relevant City of York Council's Local Plan Working Group (LPWG - a Member advisory group) and Executive meeting agenda(s) where the City of York Local Plan was an item thereon and in the public domain (i.e. on CYC's website) were sent, via email, to officers in the Leeds City Region Strategic Planning (Duty to cooperate) Group and the North Yorkshire and York Spatial Planning and Technical Officer Group. This was to enable respective authorities and organisations with officers on those groups to make representations, should they wish to do so, to be put to the LPWG or Executive when considering the corresponding local plan item.

### **Demonstrating the resultant positive outcomes**

4.42 The Duty to co-operate Matrix at **Error! Reference source not found.** Annex 2 contains a comprehensive list of the main positive outcomes that will be achieved through fulfilling the Duty. Below are some key areas where cooperating to achieve positive outcomes is most advanced.

### **Housing**

4.43 On the whole, the general direction and purpose of the work undertaken by City of York to analyse the extent of the York housing market area (HMA) and information on housing land supply across the market area are all supported by prescribed bodies and adjacent authorities.

4.44 National planning practice guidance (PPG) and further guidance from the Planning Advisory Service (PAS) sets out a process for deriving the objectively assessed need and then testing the implications of that need figure against policy considerations. It is evident from both pieces of guidance that there is a combination of factors, including national factors such as the uncertainty in the national population projections, which will affect the objectively assessed need calculation (prior to any policy considerations). In addition to these uncertainties there is the potential for different assumptions being made about the interactions between the factors which affect housing growth in the Plan's prepared by adjoining Local Authorities, which can impact on the exercising of the Duty to Co-operate between neighbours with consequential effects on the soundness of Plans. To help to reduce this risk the Leeds City Region (LCR) has agreed a common methodology for determining objectively assessed need. This is set out in a report for the City Region by Edge Analytics *The Objective Assessment of Housing Requirements – Establishing a Common Methodological Approach*. This report sets out a common start point and a robust and transparent methodology which enables a clear consideration of the different factors which shape housing growth and of how different scenarios are used to explore the impact of different factors which shape housing growth and of how different scenarios are used to explore the impact of different factors.

4.45 This analysis reviewed methodologies, data inputs, assumptions and resulting scenario outcomes that have informed the objective assessment of need. All districts have derived a housing growth target based on the evidence available.

4.46 In regard to objectively assessed need and the Duty, the report

- stated '*For any local authority area, there is no single, definitive view on the likely level of future growth, with a mix of economic, demographic and national/local policy issues ultimately determining the speed and scale of change. For local planning purposes, it is necessary to evaluate a range of growth alternatives to establish the most 'appropriate' basis for determining future housing provision.*';
- stated '*The process of cooperation between neighbouring authorities can be better facilitated if approaches and methods used for evidence generation and plan formulation are comparable and if data sources and assumptions that have been used are consistent*', and
- recommended '*LCR authorities give due consideration to the methodological framework that is presented [in the report] as they seek to achieve consensus through collective scrutiny and review of their respective Local Plans.*'

4.47 Experience of Plan making in different parts of the country has shown that a failure to properly consider housing market geography can lead to an unsound Plan. In response to this the LCR commissioned a review of the evidence on the geography of housing markets at the same time as the abovementioned work for establishing a common methodological approach. The review *Understanding the cross boundary impacts of housing markets* considered local, regional and national evidence drawn from previous studies of housing market geography. The report identified uncertainty in the geographies identified and in the potential strategic cross boundary relationships which would need to be explored through the Duty to Co-operate. It highlighted the fact that housing market relationships between different areas operate at a number of different levels. Where cross boundary market relationships exist, they are not always of sufficient scale or significance to warrant the formulation of new market area definitions.

4.48 With regard to the approaches and methods used for evidence generation and plan formulation being comparable as set out in *The Objective Assessment of Housing Requirements – Establishing a Common Methodological Approach* and the cross boundary relationships identified in *Understanding the cross boundary impacts of housing markets* GL Hearn (GLH) and Justin Gardner Consulting (JGC) were commissioned by City of York Council, Ryedale District Council, Hambleton District Council and the North York Moors National Park Authority area to develop a Strategic Housing Market Assessment (SHMA) covering these areas as a whole and individually. The purpose of the SHMA was to develop a robust understanding of housing market dynamics, to provide an assessment of future needs for both market and affordable housing and the housing needs of different groups within the population. In addition Harrogate Borough Council also commissioned GL Hearn, separately, to provide an update on the Borough's housing and economic development needs. The methods and approach for this were aligned with those abovementioned authorities who commissioned GL Hearn and the data sources and assumptions were consistent.

4.49 The resultant City of York SHMA (2016) identified that.

- in market-terms the relationship between York and Hambleton is relatively strong;

- migration and travel to work patterns identify a degree of self-containment which approaches or exceeds expected thresholds for housing market areas;
- York is very self-contained but is strongly linked to Selby;
- In travel to work terms York has a strong influence in the immediately surrounding districts particularly Selby, the southern parts of Hambleton and the eastern parts of Ryedale and East Riding, and
- Leeds' influence is likely to extend into the western periphery of the York area.

4.50 This correlates with a separate report that was commissioned by the West Yorkshire Combine Authority (WYCA) entitled 'Leeds City Region Housing Market Areas' (CURDS 2016) which identified that

- York has stronger links to the more northerly N.Yorkshire local authorities (LAs) than does Harrogate
- Selby LA has no robust boundaries splitting it from HMAs centred on York and on Leeds

4.51 All of the above work supports the approach in the City of York Local Plan (and those of its neighbours in the current round of plan making) to meet its own objectively assessed housing need within its local (unitary) authority area boundary, and not to prepare a joint plan with any of its neighbours.

### **Gypsy and Travellers**

4.52 There are no pressing cross border issues reported with other Yorkshire authorities, but neighbouring areas and the City of York have started working together to share the methodologies and findings from their Gypsy Traveller Accommodation Assessments, establish a greater understanding of travelling patterns, regularly exchange information, share best practice on site management, and develop a common protocol for managing unauthorised encampments. This work is already underway with Wakefield and York leading on a project to develop a common methodology to identify sites for the Leeds City Region Strategic Planning (Duty to Cooperate) Group.

### **Economy**

4.53 The Local Plan has been prepared to enable York to realise its economic growth ambitions as set out within the York Economic Strategy (2016), thus, contributing to a vibrant economy. This includes York fulfilling its role as a key driver in the Leeds City Region, the York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) area and the functional York Sub Area.

4.54 Annex 6 contains the duly completed LCR Strategic Economic Plan (SEP) Self-Assessment Template for the City of York Local Plan, as presented to the LCR Planning Portfolios Board on The Leeds City Region LEP / West Yorkshire Combined Authority representation to the City of York Local Plan Pre Publication Draft (Regulation 18 Consultation) 2017, stated that '*The Plan forms a complete suite of local policies therefore it directly addresses many aspects of the strategies*

*laid out in the SEP*'. The following SEP Strategic Priorities are addressed by the emerging Plan:

- Growing businesses
- Skilled people, better jobs
- Clean energy and environmental resilience
- Infrastructure for growth
- Transport

4.55 Although a similar template is yet to be completed for the YNYER LEP, the LEPs representation to the City of York Local Plan Publication Draft February 2018 (Regulation 19 Consultation) states *'The City of York Local Plan Publication Draft identifies a significant number of housing, employment and retail opportunities to deliver growth up to 2032. The quantum and nature of the proposed development will be of great strategic benefit to this LEP area [...]'*.

### **Transport**

4.56 Transport is one of the major cross-boundary issues identified. Specific parts of the Strategic Road Network and public transport routes are highlighted as showing the most potential for cross-boundary cooperation.

- *A64 Memorandum of Understanding (MoU)*

4.57 For many years, Ryedale District Council has worked in partnership with North Yorkshire County Council, Scarborough Borough Council, the City of York Council and the Highways Agency to promote the improvement of the A64 between York and Scarborough. In 2011, a study funded by the authorities identified a range of potential measures to improve safety and journey reliability on the trunk road and to improve connectivity between York, Malton and Scarborough. The total cost of the various measures was £315m.

4.58 In May 2012, the Highways Agency (HA) wrote to the York Sub-Area Joint Infrastructure Working Forum to request that *'local authorities whose development impacts along the A64, along with North Yorkshire County Council, make a commitment towards reducing the impact of development on the A64 and work in partnership with to develop and implement a holistic package of solutions to reduce and mitigate the impact of development along the A64. We suggest that this commitment could take the form of a MoU. A MoU would provide us with more confidence in the local authorities' commitment to improvements along the A64 and would provide a structured approach to identifying solutions.'*

4.59 In October 2013, an informal A64 Officers Group was established comprising relevant officers from all the interested local authorities and the HA. The purpose of the group is to speak with a single, strategic voice to promote the improvement of the A64 and transport in the A64 corridor to the LEP, Government, MPs etc. The prime output from this group has been the production of the 'Memorandum of Understanding for A64 Trunk Road, York - Scarborough Improvement Strategy' (see also Annex 7), to establish a framework for effective co-operation to enable the development and implementation of a long term programme of improvements for the A64 trunk road between York and Scarborough. All the interested authorities, as



listed in Annex 7 **Error! Reference source not found.**, have signed-up to as 'Parties' to the MoU.

- *A64 Group Funded feasibility Studies*

The Highways has been undertaking a series of Route Based Studies (RBS) for the Strategic Road Network. One of these - South Pennines RBS - includes the A64. The HA is now taking the RBSs into a series of Route Strategies, and under this programme it is working up options for the A64 to assess for feasibility, with a view to them being implemented by 2021. Local authorities, as parties to the A64 MoU, are continuing to promote the potential improvements to the A64 and will work with the Highways Agency on the Route Strategy for the A64, to help prioritise funding bids and future investment. They have also come together to commission a study to identify and carry out sufficient preliminary design on a series of schemes on the A64 trunk road between York and Scarborough, to allow them to take advantage of potential funding opportunities from central Government as they arise.

- *Harmonisation of Strategic Models for determining the effects of development on the A64.*

4.60 In November 2012 officers from City of York Council met with officers from the HA and North Yorkshire County Council (NYCC) to investigate how each of the respective body's transport model can be better integrated with those of the other bodies to assess the impacts of proposed development along the A64. Since this inaugural meeting, the HA has developed a new 'Dynamec' model which it has used, previously, to test the impact of the Local Development Framework Developments on the SRN in the North East, North West and West Yorkshire. City of York Council has been working with the HA to achieve convergence of its SATURN model with the HA's Dynamec model. The latest situation is that full convergence has not been achieved. However, a degree of convergence has been reached such that the traffic demands predicted on the A64, using SATURN are not unreasonably dissimilar to those predicted using Dynamec, and that these technical differences can be reasonably explained. Ultimately, The HA will use the Dynamec output to 'test' the impacts of growth in the City of York Local Plan on the A64, to determine whether the impacts are acceptable to it.

- *A64/A1079/A166 Grimston Bar*

4.61 The outputs from transport modelling undertaken by City of York Council, and the HA (see para. 5.42 above) will also be used to assess the traffic impacts on the A64/A1079/A166 Grimston Bar taking into account the projected growth in traffic arising from the Plan and the East Riding of Yorkshire Local Plan. Once these impacts have been determined, City of York Council will continue to work with East Riding of Yorkshire Council and the HA to determine the overall scale of improvement needed at this junction to mitigate the impacts, and, where possible, apportion costs for the design and construction of the improvement. Improvements to the A64/A1079/A166 Grimston Bar Junction (including approach roads) is included in Policy T4 of the Local Plan as a strategic highway network capacity improvement scheme to be implemented in the Medium term (2022/23 – 2027/28).

- *Leeds-Harrogate-York Rail Line Improvements*

4.62 City of York Council has been a member of the Harrogate Rail Line Officers Group that has been meeting regularly for over 10 years. The group membership comprises of City of York Council, Harrogate Borough Council, Harrogate Chamber of Trade & Commerce, Network Rail, train operators on the line, currently Northern and Virgin Trains East Coast, North Yorkshire County Council and West Yorkshire Combined Authority. The primary purpose of the group is to seek the necessary improvements to the line to help deliver sustainable economic growth in the authority areas through which the line runs. In 2012 the group jointly funded the commission of the 'Leeds-Harrogate-York line Improvements, Outline Transport Business Case. The key conclusion from this commission, which was presented in 2013, was that 'Increasing the capacity of the line will offer opportunity for rail services to accommodate an increased number of passengers with associated revenue, with the service capacity increase able to support economic development along [the] rail line corridor.' The Business Case was developed around a list of Conditional Outputs to encourage electrification of the line, however it also highlighted potential benefits such as increased frequency, improved journey times, improved rolling stock which could be delivered with or without electrification and these are currently being taken forward.

4.63 Consequent to this business case, North Yorkshire County Council brought forward proposals for infrastructure changes to the Leeds-Harrogate-York line to enable increased frequency to two trains an hour and potentially faster journey times within its bid to the North Yorkshire and York Local Transport Body in 2013. The line was also evaluated as part of the Rail North Electrification Task Force Report to Government in Autumn 2014 and was in the top six for electrification in the North, current Government thinking is looking at electrification as one of several options, including bi-mode trains, going forward. City of York Council will continue to work with partner organisations to pursue improvements to services on the line.

- *York Station*

4.64 City of York Council is working in partnership with Network Rail on a development framework for York Station and the area around the station, the objectives of which include:

- Improve interchange
- Reduce conflict between modes at the station frontage
- Improve pedestrian movement within and around the station

## **Infrastructure**

4.65 Although there is a requirement under paragraph 156 of the NPPF for the Council Local Plan to set out the strategic policies to deliver the provision of infrastructure The Council is not the sole organisation responsible for delivering the necessary infrastructure, so has to work in partnership with other organisations to deliver it.

4.66 As can be seen from Table 4.5 extensive discussions have taken place with numerous prescribed bodies and other organisation in preparing the City of York Local Plan. For example

- discussions with Utilities (e.g. Northern Powergrid and Yorkshire Water) have identified whether there is a need for strategic infrastructure and the infrastructure needed to support development, particularly for the larger strategic sites;
- Discussions with Highways England have identified schemes on the Strategic Road Network (SRN) it is intending to implement in future investment programmes that would not only deliver its desired outcomes for the SRN but also assist in delivering the Local Plan (e.g. upgrading the A64/A1237 at Hopgrove), and
- Discussions with the health sector (GGC, Trusts and the City of York Councils public health team) have established the needs for clinical accommodation at York District Hospital, mental health facilities, GPs and dentists

4.67 City of York Council has also made successful bids to the LCR LEP, the YNYER LEP and the West Yorkshire Combined Authority (WYCA) to fund key strategic infrastructure or and feasibility studies for preparing the business case for additional infrastructure, including

- £32.4 m West Yorkshire<sup>+</sup> Transport Fund (WYTF<sup>+</sup>) for junction upgrades on the A1237
- £33m WYTF<sup>+</sup>, £2.5m WYCA Local Growth Fund (LGF) and £3.5m YNYER LEP LGF for a package of schemes to provide and improve access to York Central and to and within York Station by all modes
- £295,000 WYCA funding for a pre-feasibility study to evaluate options for upgrading the A1237 to a dual carriageway.

## Energy

4.68 Concerns were raised regarding the impact of renewable energy schemes in York affecting neighbouring authorities. The Plan, through Policy CC1, encourages renewable and low-carbon energy generation and storage, and seeks to ensure that suitable are identified and projects developed. Policy CC1 also contains criteria for how applications for renewable and low-carbon energy generation development should consider the impact the scheme may have upon several aspects, including

- York's historic character and setting - including the sensitivity of scheme to the surrounding landscape and proximity to sensitive land uses;
- local communities and residential amenity

4.69 Furthermore, to assist in the assessment of proposals coming forward City of York Council will encourage applicants to use 'Managing landscape Change: Renewable and Low Carbon Energy Developments – A Sensitivity Framework of North Yorkshire and York (2012)'.

4.70 The potential areas of search for renewable energy (namely wind turbines) and the areas close proximity to areas of nature conservation, specifically the River Derwent Corridor was also raised as a more specific issue. As a result, the revised

Renewable Energy Study (2014) introduces additional constraints and therefore identifies revised areas of search for wind energy which excludes the River Derwent Corridor.

### **Flood Risk**

- *City of York Local Flood Risk Management Strategy and Surface Water Management Plan*

4.71 Under the Flood and Water Management Act 2010 (FWMA), introduced to provide legislation for the management of risks associated with flooding and coastal erosion, City of York Council has major responsibilities as the Lead Local Flood Authority (LLFA), to “develop, maintain, apply and monitor a strategy for local flood risk management in its area”. The Council adopted its Local Flood Risk Management Strategy (LFRMS) in March 2015. The aim of the LFRMS is to understand flood risk from all sources in the city, reduce its likelihood and impact on residents and visitors and take the opportunity to improve the city environment. The LFRMS also contains a Strategic Action Plan, and actions that can be pursued for:

- revention of risk;
- protection from risk;
- preparing for risk, and
- recovery and review of risk

4.72 Surface water is also an important consideration, the City of York Council Flood Risk Management Team are a statutory consultee on surface water matters within the planning process. A Surface Water Management Plan (SWMP) is a framework to understand the causes of surface water flooding and a way to agree the most cost effective way of managing surface water flood risk. A SWMP for York was approved in December 2012. On the whole that there are no major problems within the City of York authority boundary with surface water flooding.

4.73 Responsibility for the management of flood risk from main rivers, the sea and reservoirs remains with the Environment Agency (EA), which has published its national flood risk management strategy for England. The Council will work in partnership with the EA and other flood Risk Management Authorities (RMAs) in the delivery of the measures detailed in the Strategic Action Plan.

- *how we're reducing the risk of flooding for York: Our 5-year plan*

4.74 Following the flooding in December 2015, the Government allocated £17 million of funding to improve and upgrade the Foss Barrier. In addition to this, the Government committed a further £45 million to reduce the risk of flooding and increase the level of protection to at least 2,000 homes in York's city centre over the next five years. Since receiving this additional funding, the EA has assessed what changes could be made to the existing flood defences within the city and what new defences could be built. The results of this have been summarised within the EA's publication '*how we're reducing the risk of flooding for York: Our 5-year plan*'. The EA will use this to guide its work in York over the next 5 years to achieve a consistent standard of flood protection across the city. This plan outlines the work across 10 York communities, looking at a range of potential flood reduction measures including

- creating storage areas
- increasing pumping capacity
- raising and building new walls
- raising land
- building embankments

4.75 The EA has recognised there is a need for a long-term plan to better prepare York for the risk of future flooding and to mitigate the effects of climate change. To achieve this, the EA needs to look at the catchment as a whole and understand the risks of flooding beyond the city of York. It has started to develop a plan of action, working with a wide range of partners across the city and the surrounding area to prepare York for the future. The plan will focus on:

- Enhancing the way the development planning system can reduce the risk and impacts of flooding to new and existing developments.
- Improving flood forecasting tools and technology to provide more timely and targeted flood warnings.
- Upstream storage and natural flood management techniques that can slow the flow and help regulate the flow of water into the city.

4.76 Another measure to be undertaken in the prevention of flood risk is for City of York Council supported by the EA, internal drainage boards and Yorkshire Water Services to input into strategic planning and strategic development sites to identify sustainable flood risk and drainage solutions.

### **Minerals and waste planning**

4.77 The City of York Local Plan contains the strategic policies on minerals and waste.. Under the National Planning Policy Framework (NPPF), additional Development Plan Documents (DPDs) can be used where they can be clearly justified. Officers have been evaluating the possibility of pursuing a joint Waste and Minerals DPD with both North Yorkshire County Council (NYCC) and the North Yorkshire Moors National Park Authority (NYM). The City of York already has a close working relationship with the County with regard to waste management, and such plans are generally produced to cover a larger geographical area than that covered by the City of York.

4.78 Therefore, alongside the Local Plan a separate joint minerals and waste development plan document - the Minerals and Waste Joint Plan - is also being prepared with North Yorkshire County Council and the North York Moors National Park Authority. City of York Council, North Yorkshire County Council and the North York Moors National Park Authority covering all three planning authority areas. When finalised, the new Joint Plan will help the three Authorities take decisions on planning applications for minerals and waste development over the period up to 31 December 2030.

4.79 The decision to prepare a joint plan for minerals and waste was taken in 2013, recognising the benefits and efficiencies that can arise through joint working, including in terms of helping to satisfy the statutory Duty to Co-operate in plan

making. The Minerals and Waste Joint Plan has been submitted for Examination and Examination hearings were held in early 2018.

### **Has City of York Council complied with the Duty?**

4.80 As mentioned in paragraph 4.25 the two principal formal member groups within the Leeds City Region (LCR) and the Local Government North Yorkshire and York (and East Riding) area (NY&Y) at which issues relating to the Duty are raised are the LCR Planning Portfolios Board and the Spatial Planning and Transport Board. City of York Council presented a report to both of the abovementioned boards (on 15 December 2017 and 17 January 2018 respectively) that provided an update on the preparation of the City of York Local Plan and the recent Pre-Publication Draft (Regulation 18) Consultation, 2017 (PPDRC) and set out the work that City of York Council has undertaken to discharge its responsibilities under the Duty to Co-operate. The minutes for each of the meetings at which the report was presented (contained at Annex 8 and Annex 9 respectively) show that **both of these boards resolved to endorse the approach taken by City of York Council in meeting the requirements of the Duty to co-operate in the plan making process.**

## **5 Continuing Compliance with the Duty into the future**

- 5.01 The nature of many of the positive outcomes identified above demonstrates that City of York Council will continue to comply with the Duty in the future. In order to ensure this compliance, the Council will continue to meet with other authorities in the region.
- 5.02 Footnote 1 to Table 4.1 shows that from 2016 onwards, responsibilities for reporting to the North Yorkshire and York Spatial Planning and Transport Board (the Board - an elected member group) passed from the from the North Yorkshire and York Technical Officer Group (ToG) to the York North Yorkshire and East Riding (YNYER) Heads of Planning (HoP), (if necessary, via the YNYER Directors of Development (DoD)). Constituent authorities within the YNYER can propose issues to be considered by the Board through HoP (and Dod). City of York Council retains its role as the Secretariat to the Board and will arrange Board meetings and submit papers etc., as advised by HoP.
- 5.03 Table 4.1 also lists the North Yorkshire Development Plans Forum (NYDPF) as an officer group. This group has met regularly since 2004 to share, in a relatively informal way, information relating to the progress of local development documents (including development plan documents) and any other matter that may be of relevance or interest to officers preparing local development documents. Following the transfer of responsibilities away from ToG for reporting to the North Yorkshire and York Spatial Planning and Transport Board, there has been a move towards combining the previously separate NYDPF and ToG group meetings to form a NY&Y Strategic Planning (Duty to Cooperate) Group, similar to the Leeds City Region, Strategic Planning (Duty to Cooperate) Group. The meeting dates for the combined NYDPF/ToG for the year ahead are as follows:
- 15 August 2017, 10am – 1pm, NYCC, County Hall, Northallerton
  - 21 November 2017, Harrogate Borough Council offices

- 20 February 2018, Hambleton District Council
- 2 May 2018, City of York Council

5.03 It is likely that the combined NYDPF/ToG group will act as a task/finish group to undertake work on behalf of the Board (as advised through HoP), as well as considering strategic issues under the Duty to co-operate.

5.04 City of York Council intends to present the Plan (and the subsequent Publication Draft Local Plan) to the relevant officer and Member groups within the Leeds City Region and the York North Yorkshire and East Riding sub-area, for their consideration and agreement that CYC is meeting the requirements of the Duty in preparing the Plan.





### **List of Annexes (available from the author of the report)**

- Annex 1: Leeds City Region Statement of Cooperation for Local Planning
- Annex 2: City of York Local Plan Duty to co-operate Matrix
- Annex 3: Former Strategic Approach to Co-operation
- Annex 4: RSS York Sub area Policy
- Annex 5: Example Record(s) of engagement with Local Authority or 'Prescribed Body'
- Annex 6: LCR Strategic Economic Plan (SEP) Self-Assessment
- Annex 7: Memorandum of Understanding for A64 Trunk Road York - Scarborough Improvement Strategy 3
- Annex 8: Minutes of Leeds City Region Planning Portfolios Board, 15 December 2017
- Annex 9: Minutes of the York & North Yorkshire Spatial Planning & Transport Board, 17 January 2018

