

## CITY OF YORK LOCAL PLAN

City of York Local Plan  
Draft Consultation Statement  
Regulation 22(c) of the Town & Country  
Planning (Local Planning) (England)  
Regulations 2012 (as amended)  
April 2018



# **City of York Local Plan Consultation Statement Regulation 22(c) of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

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# **City of York Local Plan Consultation Statement Regulation 22(c) of the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)**

## **1.0 Introduction**

### **Legislative background**

- 1.1 This Statement of Consultation has been prepared in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Its purpose is to show how we have met the legal requirements for consultation.
- 1.2 Regulation 22 (1) (c) requires a statement setting out:
- i) which bodies and persons the local planning authority invited to make representations under regulation 18;
  - ii) how those bodies and persons were invited to make representations under regulation 18;
  - iii) a summary of the main issues raised by the representations made pursuant to regulation 18;
  - iv) how any of those representations made pursuant to regulation 18 have been taken into account;
  - (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
  - (vi) if no representations were made in regulation 20, that no such representations were made.
- 1.3 During the course of preparing the LDF Core Strategy and now the Local Plan, the relevant Regulations, originally published in 2004 were updated in 2008 and 2009. In April 2012 a set of Regulations were issued which replace all previous versions in their entirety. Whilst the requirement to produce a Consultation Statement is not new, the specific regulations, which refer to it, have changed. The Regulations refer to the entire process of preparing Development Plan Documents (DPDs) such as the Local Plan. Work undertaken under previous Regulations is still valid albeit that the specific Regulation (including number) may have changed. Under previous regulations most of the work in preparing the Local Plan/Core Strategy was referred to as Regulation 25. In the 2012 Regulations the equivalent stage is referred to as Regulation 18. In addition new Regulations came into force on 15<sup>th</sup> January 2018, these removed paragraph 2 of Regulation 22 "(2) Notwithstanding regulation

3(1), each of the documents referred to in paragraph (1) must be sent in paper form and a copy sent electronically."

## **2.0 Statement of Community Involvement and Database**

### **Statement of Community Involvement**

2.1 The Statement of Community Involvement (SCI) sets out how the Council intends to achieve continuous community involvement in the preparation of all planning documents. The Council's SCI acts to guide consultation on planning documents and sets the scene on how efficient and effective consultation can be achieved. Following three stages of consultation and independent examination, the City of York's SCI was adopted in December 2007.

### **Database**

2.2 The SCI sets out at paragraph 5.1 information regarding the Council's Database. The Council has compiled a database to include the individuals and organisations who have registered an interest in the York Local Development Framework (LDF)/ Local Plan process. This is not a fixed list and further contacts will be added as they are identified, whilst others may no longer wish to be involved and will be removed from the database on request.

## **3.0 Development of the Local Plan**

3.1 The development of the City of York Local Plan reflects work which began in 2005 when the Council commenced the preparation of its Local Development Framework (LDF) Core Strategy. This has included engagement, assessment and the development of a substantial body of evidence. Consultations were undertaken at the following key stages:

- LDF Core Strategy Issues and Options 1 (2006);
- LDF Core Strategy Issue and Option 2 (2007);
- LDF Core Strategy Preferred Options (2009);
- LDF Core Strategy Submission (Publication) (2011);
- Local Plan Preferred Options (2013);
- Local Plan Further Sites (2014);
- Local Plan Preferred Sites (2016);
- Local Plan Pre Publication (2017);
- Local Plan Publication (February 2018).

- 3.2 This document is set out in sections based on the above key consultation stages. Each section identifies where information can be found on the consultation documents produced, who was consulted, how we consulted, the various methods used and a summary of the responses received. All of the consultations referred to in this statement were carried out in compliance with the Council's adopted Statement of Community Involvement.
- 3.3 In line with the regulations this statement also needs to set out how comments and representations made have been taken into account during the Local Plan drafting stage (Regulation 18). Several documents have set this out including *The City of York Local Plan Sustainability Appraisal, Appendix K– Policy and Site Audit Trail (February 2018)* which is Annex 1 to this report. This includes an audit trail of the development of policy and sites within the Local Plan, including views received through consultation starting from the LDF Core Strategy to the Pre-Publication Local Plan (2017). This was undertaken as part of the Sustainability Appraisal process but is still of relevance in relation to the audit of policies and sites.
- 3.4 In addition a schedule of non employment and housing sites/growth related policies modifications to York's Local Plan since the Preferred Options Local Plan in 2013 and officer assessments of housing, employment and other sites since Preferred Sites Consultation (2016) are set out in part of the Council's Executive Report from 13<sup>th</sup> July 2017 including the Council minutes are set out in Annex 2 of this report. This helps to show the evolution of policies and sites in York's Local Plan.
- 3.5 The changes made between the Pre-Publication and Publication Local Plan for policies and sites are set out as part of the Council's Executive Report in Annex A from 25<sup>th</sup> January 2018 and the associated Council minutes show the audit trail of Council Members decisions on the proposed changes, please refer to Annex 3 of this report. More information on how comments have been taken into account can also be found in Section 7 of this report.

## **4.0 LDF Core Strategy**

### **LDF Core Strategy Issues and Options 1 and 2**

- 4.1 The first step in preparing the LDF Core Strategy was to consider the key issues and options facing York. To aid the discussion of the issues

and options an initial document was produced called the *Core Strategy Issues and Options (2006)* which outlined some of the key issues facing York and possible options for addressing these documents. To ensure that the Core Strategy would be deemed 'sound' the Council decided to undertake a second round of issues and options consultation, known as the *Core Strategy Issues and Options 2 (2007)* document and was held jointly with the consultation on the review of the Sustainable Community Strategy. This consultation was also known as 'Festival of Ideas 2'.

- 4.2 The LDF Issues and Options consultation for the Core Strategy took place for 7 weeks between June-July 2006 (Issues and Options 1) and 6 weeks between September-October 2007 (Issues and Options 2). The Consultation Statement *LDF Issues and Options Consultation Summer 2006* (July 2007) summarises consultation on Issues and Options 1 and was prepared to support consultation on Issues and Options 2. Please refer to Annex 4 of this report. Whilst the Statement stands alone the information it includes was also included in the Issues and Options 2 statement. The *Core Strategy Consultation Statement* (July 2009) summarised consultation on Issues and Options 1 and 2 and was prepared to support consultation on Preferred Options. Please refer to Annex 5 of this report.
- 4.3 Annex 4 and Annex 5 of this report set out in detail the consultation documents produced, who was consulted, how we consulted; the various methods used, and provide a summary of the responses received. For the purpose of this report, a summary is also provided below.
- 4.4 A list of the people consulted on the LDF Core Strategy Issues and Options 1 and 2 can be found in Appendix 1 of Annex 5 to this report. The Issues and Options consultations involved a mail out, internet content, media coverage, consultation events, workshops, forums and attendance at ward committees, interest group and specific consultee meetings and information was also made available at Council offices. A questionnaire was also circulated as part of the consultation on Issues and Options 2. A total of 932 separate responses were received as a result of the consultation on Issues and Options 1 from 124 respondents. The Council received 1560 responses to the Issues and Options 2 consultation from 78 respondents and 2330 people responded to the Festival of Ideas 2 questionnaire as part of Issues and Options 2.

## **LDF Core Strategy Preferred Options**

- 4.5 The Preferred Options stage of the Core Strategy followed on from the Issues and Options stages. The *Core Strategy Preferred Options (2009)* document draws from the responses that were received during the previous consultation events as well as feeding in the evidence base findings and higher level policy such as national and regional planning policy.
- 4.6 The LDF Preferred Options consultation was undertaken for the Core Strategy for 11 weeks between June-August 2009. The *Core Strategy Preferred Options Consultation Statement & Schedule of Responses (February 2011)* included a summary of the consultation to support the Core Strategy Submission Draft document. Please refer to Annex 6 of this report which sets out the consultation documents produced, who was consulted, how we consulted, the various methods used, and provides a summary of the responses received. For the purpose of this report, a summary is also provided below.
- 4.7 A list of all those consulted on the LDF Core Strategy Preferred Options is provided in Annex 1 of Annex 6 to this report. The Preferred Options consultation involved a mail out, questionnaire, internet content, media coverage, consultation events, workshops, forums and attendance at ward, interest group and specific consultee meetings, and information being made available at Council offices. Over 2,250 'Planning York's Future' questionnaires were returned to the Council and a total of 1249 separate comments on the Core Strategy document were received as a result of the consultation from 117 respondents. In addition over 160 people gave their views by attending one of the consultation workshops.
- 4.8 A Statement in accordance with Regulation 30(d) of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, was produced in September 2011/amended 2012 (*Core Strategy Submission (Publication) Consultation Statement Regulation 30 (1) (d) Statement (September 2011/amended 2012)*). Please refer to Annex 7 of this report. This document set out which bodies and persons the local planning authority invited to make representations as part of the Issues and Options and Preferred Options consultations (Regulation 25); how those bodies and persons were invited to make representations; a summary of the main issues raised by the representations made; and how any representations made have been taken into account. The Statement follows on from, and should be read alongside, the Consultation Statements published for the Core Strategy Issues and Options and Preferred Options consultations above.



## **LDF Core Strategy Submission (Publication)**

4.9 The *Core Strategy Submission (Publication) (2011)* followed on from previous rounds of consultation and draws from the responses received, as well as feeding in the evidence base findings and higher level policy such as national planning policy. It was consulted on over 6 weeks between September-November 2011. A Statement in accordance with Regulation 30(e) of *The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008*, was produced in January 2012 (*Core Strategy Consultation Statement Regulation 30 (1) (e) (January 2012)*). This document provides the number of duly made representations received on the Submission (Publication) Core Strategy, and the main issues raised by the representations received. Please refer to Annex 8 of this report. For the purpose of this report, a summary is also provided below.

4.10 During the representation period a total of 1385 representations were received from 141 organisations and individuals. The Submission (Publication) consultation involved a mail out, questionnaire, internet content, media coverage, consultation events, workshops, forums and attendance at ward, interest group and specific consultee meetings, and information being made available at Council offices.

## **LDF Core Strategy Submission**

4.11 The LDF Core Strategy was submitted to the Secretary of State on 14th February 2012, just before the new NPPF was issued. Following an exploratory meeting with the Inspector on 23rd April 2012 the Director of City and Environmental Services wrote to the Inspector on 28th May 2012 to inform him of the decision to reluctantly recommend to Council the withdrawal of the City of York Council's Core Strategy. This course of action was approved by the City of York Council on 12th July 2012 and the City of York Core Strategy Examination was ceased. The key reasons were:

- the LDF was overtaken by publication of the NPPF;
- moving to a Local Plan would include site allocations, critical to supporting and delivering growth;
- considering allocations would enable a clearer and practical focus on viability and deliverability; and
- the approval of the Community Stadium required the reviewing of the retail evidence base/city centre policies.

4.12 Reflecting the Government's views of plan making and the movement away from a folder of development plan documents to a single plan, in October 2012 Cabinet instructed Officers to begin work on an NPPF compliant Local Plan for York.

## **5.0 Production of the City of York Local Plan**

### **Local Plan Preferred Options**

5.1 The production of a Local Plan allowed for the creation of a planning strategy that responded to relevant contemporary issues facing York. In Autumn 2012 a comprehensive 6 week 'Call for Sites' was carried out, asking developers, landowners, agents and the public to submit land which they thought had potential for development over the next 15-20 years. These sites form the basis of the site selection process for the Local Plan. The press coverage for the consultation included a Your Voice, Autumn 2012, Article – *Planning York's Future*: This publication was distributed to all York residents. The article highlighted the Council's website as a place to find out more. In addition there was a Yorkshire Post, 7 November 2012, Article – *Pioneering Research to Shape Historic City's Economic Future*. The Yorkshire Post is read by approximately 193,000 people. The article highlighted that the Council "is now embarking on wide-ranging research to provide the evidence needed to develop an economic and retail vision to underpin the city's new development brief after initial proposals had to be shelved due to concerns over their viability". There were nearly 300 individual site submissions during the consultation period to be considered for a range of development purposes.

5.2 In addition as part of the initial process of developing the Local Plan, a series of workshops were held to establish key issues within York to help write the Vision. These workshops took place between October and November 2012. The themes of the workshops were in keeping with the Council Plan Themes. The Protect Vulnerable People theme was covered in all workshops, as was Sustainability. The workshops included:

- Create Jobs and Grow the Economy – Held at The Mansion House on 5<sup>th</sup> November 2012 and chaired by Andrew Follington, Area Commercial Director North Yorkshire of HSBC.
- Get York Moving – Held at The King's Manor on 25<sup>th</sup> October 2012 and chaired by Nigel Foster, Director for Fore Consulting.

- Build Strong Communities – Held at The King’s Manor on 6th November 2012 and chaired by John Hocking, Executive Director of the Joseph Rowntree Housing Trust.
- Protect the Environment – Held at The King’s Manor on 23rd October 2012 and chaired by Mike Childs, Head of Policy, Research and Science at Friends of the Earth.

5.3 The Local Plan Preferred Options document (June 2013) draws from the responses that were received during earlier consultations on the LDF Core Strategy, Call for Sites, Visioning Workshops and other LDF documents. The City of York Local Plan Preferred Options – Consultation Audit Trail (May 2013) which is Annex 9 of this Report provides an audit trail that describes how the Council has undertaken community participation and stakeholder involvement to produce the Local Plan Preferred Options. A Local Plan Preferred Options Consultation Statement (2015) was also prepared and sets out in detail the consultation documents, who was invited to make the representations, how people were invited to make the representations, the number of responses received, details on the petitions received and the main issues raised. This can be found in Annex 10 to this report. For the purpose of this report, a summary is also provided below. The Annexes to Annex 10 also gives a copy of comments form and site submission form, a copy of the letter to consultees, a copy of the leaflet and a summary of petitions. Summary tables including of all the comments received to the Preferred Options Consultation can be found using the following web link:

[https://www.york.gov.uk/downloads/download/3050/local\\_plan\\_preferred\\_options\\_consultations\\_summary\\_tables](https://www.york.gov.uk/downloads/download/3050/local_plan_preferred_options_consultations_summary_tables)

5.4 York’s Local Plan Preferred Options was subject to an 8 week consultation from the 5<sup>th</sup> June to 31<sup>st</sup> July 2013. Approximately 9,457 responses were received from 4,945 respondents. In addition to individual responses 21 petitions were submitted during the consultation period, containing a total of 9,111 signatures. This was the highest number ever received in York for a consultation of this type.

5.5 During the consultation the Council held: 14 public exhibitions, a staff exhibition at West Offices, 16 meetings with prescribed bodies and key groups and an event was held at the Bar Convent with potential developers for key sites. This was coupled with a high level of media coverage in the local, regional and national press (including the York Press, Yorkshire Post, The Economist and Telegraph).

- 5.6 Additionally, a leaflet advertising the consultation and letting people know how they could comment on the proposals was distributed to every household. Specific consultees including Natural England, English Heritage, the Highways Agency, neighbouring authorities and parish councils were contacted by email or letter to inform them of the consultation process. We also wrote to or emailed approximately 1800 groups, businesses and individuals who previously registered an interest in planning in York and were on the Local Plan Database, to make them aware of the consultation.
- 5.7 A copy of the main documents was available for the public to view in each City of York Council libraries and in West Offices reception. A list of evidence base documents and how they could be viewed was also provided. A link was created from the Council homepage to a new Local Plan Preferred Options page. The new webpage set out what the document was, listed the consultation documents and provided details on the consultation. Several petitions were also received.

### **Local Plan Further Sites (2014)**

- 5.8 During the Local Plan Preferred Options consultation, additional information on sites was submitted by landowners and developers. This included the submission of new sites and further evidence on existing sites. In addition Officers were also undertaking work with the agents and landowners of strategic sites. This was a key part of the process of assessing suitability and deliverability before progressing to the Local Plan's publication stage. Before making any final recommendations on sites to include in the Local Plan for publication and examination the Council wanted to understand the public views on the new sites, the reconsideration of some sites that were previously rejected and potential boundary changes on some of the strategic allocations, this was done through a Further Sites Consultation.
- 5.9 A City of York Local Plan Further Sites Consultation Statement (2015) was prepared and sets out in detail the consultation documents, who were invited to make the representations, how people were invited to make the representations, the number of responses received, details on the petitions received and the main issues raised. This can be found in Annex 11 to this report. For the purpose of this report, a summary is also provided below. The Annexes to Annex 11 also gives a copy of comments form, a copy of the letter to consultees, the main issues raised through consultation on the Technical Appendices. Summary

tables of the comments received to the Further Sites Consultation can be found using the following web link:

[https://www.york.gov.uk/downloads/download/1216/local\\_plan\\_further\\_sites\\_consultation\\_summary\\_tables](https://www.york.gov.uk/downloads/download/1216/local_plan_further_sites_consultation_summary_tables)

5.10 The Further Sites Consultation was subject to a six week consultation between Wednesday 4<sup>th</sup> June and Wednesday 16<sup>th</sup> July 2014. Approximately 9,595 responses were received from 3,903 respondents. In addition to individual responses five petitions were submitted during the consultation period, containing a total of 1,664 signatures. How people were invited to make representations is set out below:

- Several targeted consultation events took place including the following exhibitions: B&Q Foyer, Hull Road (Tuesday 10<sup>th</sup> June from 2.30pm to 7.30pm, Monks Cross Shopping Park – Car Park (Thursday 26<sup>th</sup> June from 2.30pm to 7.30pm), City Centre – Parliament Street (Wednesday 2<sup>nd</sup> July from 10am to 4pm).
- Area Based meetings were also held with Ward Councillors, Parish Councillors and Planning Panels.
- There was a Council website notice on the City of York Council homepage under Current Consultations. In addition all documents and supporting information available to view on the Council's website.
- A press article was placed in the local Press newspaper on 31<sup>st</sup> May 2014. A Your Voice Article: – was sent to every household in York.
- A set of hard copies of the consultation documents were placed in West Offices Reception and in libraries across York. Area based maps are also available in each library showing the proposals in that location.
- The local plan twitter feed/facebook were used to publicise the consultation. All consultees on the Council's Local Plan database, which includes anyone who commented at the Preferred Options stage or has otherwise registered an interest in planning in York (approx. 9000), were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information.

- There were several ways in which people and organisations were able to comment on the consultation documents. These were by:
  - filling in the comments form (electronically or in writing). Paper copies were placed in the York libraries, West Offices Reception and the exhibitions. People could use the Council's online consultation tool and complete an online response form with questions available on the website at [www.york.gov.uk/localplan](http://www.york.gov.uk/localplan)
  - writing to the Local Plan team using a FREEPOST address: FREEPOST RTEG-TYYU-KLTZ, City of York Council, West Offices, Station Rise, York, YO1 6GA.
  - emailing the Local Plan team at [localplan@york.gov.uk](mailto:localplan@york.gov.uk)

### **Local Plan Preferred Sites Consultation (2016)**

5.11 The Local Plan Preferred Sites Consultation (2016) draws on the previous stages of consultation and technical work undertaken to support the plan. Its purpose was to allow the public and other interested parties to comment on the additional work relating to housing and employment land need and supply and also presented a revised portfolio of sites to meet those needs.

5.12 The Preferred Sites Consultation 2016 took place for a period of eight weeks from Monday 18<sup>th</sup> July 2016 to Monday 12<sup>th</sup> September 2016; the statutory 6 week period was extended to take account of the consultation taking place during the summer school holiday period. The Council received 4,286 responses overall from 1,766 respondents. The Local Plan Preferred Sites Consultation Statement (September 2017) gives in detail the consultation documents that were produced, sets out who was consulted, outlines the methods and techniques used during the consultation and summarises the main issues raised in the responses received. This can be found at Annex 12 to this report. Summary tables of the comments received to this consultation can be found at the following web link:  
[https://www.york.gov.uk/downloads/download/4038/preferred\\_sites\\_consultation\\_response\\_summaries](https://www.york.gov.uk/downloads/download/4038/preferred_sites_consultation_response_summaries)

5.13 An outline of how people were invited to make representations on the Local Plan Preferred Sites consultation is set out below:

- a press release to advertise consultation and how to respond was issued on 15<sup>th</sup> July, along with key media interviews including Radio York, Minster FM and York Press;
- all documents and response forms were made available online at [www.york.gov.uk/localplan](http://www.york.gov.uk/localplan) and on the main City of York website consultation finder;
- hard copies of all the consultation documents, exhibition boards and response forms were placed in West Offices Reception; it was also possible for those who required hard copies to ring or email the forward planning team and request a copy of the documents;
- hard copies of all the consultation documents and response forms were placed in Council libraries for the duration of the consultation;
- city wide distribution via Our Local Link of an 'Our City Special' with area based maps and free post response form delivered to every household;
- email or letter to all contacts registered on Local Plan database, including members of the public, statutory consultees, specific bodies including parish councils and planning agents, developers and landowners;
- staffed drop-in sessions/public exhibitions at venues across the City at the following locations:
  - Zone 1: 24th August - Tesco (Tadcaster Road), Dringhouses
  - Zone 2: 16th August - York Sport, Heslington
  - Zone 3: 11th August - Dunnington Reading Rooms, Dunnington
  - Zone 4: 3rd August - West Offices, York City Centre/ 9th August - Osbaldwick Sports Centre, Osbaldwick
  - Zone 5: 18th August - Acomb Explore Library, Acomb
  - Zone 6: 24th august - Oaken Grove Community Centre, Haxby
- exhibition boards and consultation documents including response forms available at ward committee meetings;
- meetings with statutory consultees and neighbouring authorities;
- presentation and question and answer session with York branch of the Yorkshire Local Council Association (attended by Parish Councils), York Property Forum/Chamber of Commerce and the Environment Forum; and
- targeted social media campaign via Facebook and Twitter running for the duration of the consultation.

5.14 There were several ways in which people and organisations could comment on the Preferred Sites consultation. These were by:

- filling in the comments form (available on the Council's website, on the back page of the city wide leaflet and at the libraries/west offices/exhibitions);
- writing to the Local Plan team, via a freepost address;
- emailing the Local Plan team; or
- using the Council's online 'Current Consultations' tool (Survey Monkey) and completing an online response form with questions, via the Council's website.

### **Pre Publication draft Local Plan Consultation (2017)**

5.15 Following the Local Plan Preferred Sites Consultation in 2016 several important factors arose. On the 5<sup>th</sup> December 2016 a report was considered at the Council Local Plan Working Group (LPWG). The LPWG Report highlighted two key factors firstly, on the 12<sup>th</sup> July 2016 the Department of Communities and Local Government (CLG) released the Sub National Household Projections (SNHP) which update the May 2016 release of the Sub National Population Projections (SNPP). This release indicates a higher demographic starting point for York and secondly, the Ministry of Defence (MOD) announced on 7 November that they would be disposing of a number of military sites across the country as part of their Strategy – A Better Defence Estate (MOD, 7 November 2016) this included three sites in York: Imphal Barracks, Fulford Road; Queen Elizabeth Barracks, Strensall; and Towthorpe Lines, Strensall. On the 23<sup>rd</sup> January 2017 City of York Council Members considered a LPWG Report which provided an update on the emerging Local Plan and in particular on the initial consideration of the newly submitted Ministry of Defence (MOD) sites against the Local Plan Site Selection methodology following a report to Executive on 7 December 2016. Following this technical work was carried out which established that the sites represented 'reasonable alternatives' and, therefore, should be considered as part of the Local Plan process. On 7 February 2017, the Department for Communities and Local Government (DCLG) published a Housing White Paper. As part of which, DCLG also consulted on changes to planning policy and legislation in relation to planning for housing, sustainable development and the environment. In response to the context described above the Council undertook further work relating to the following interrelated areas:

- The MOD sites and related supply implications;



- Housing Need;
- Employment Need
- Housing and Employment Land Supply and related consultation responses; and
- Non housing and employment land related policies.

More detailed information on these areas of work can be found in the LPGW Report which was considered on the 10<sup>th</sup> July 2016 and as part of the Councils Executive Report, 13<sup>th</sup> July 2017 and its associated annex's, please refer to Annex 2 of this report for the Executive Report. Given the level of change a consultation on a full plan and policies was agreed by the Executive on 13<sup>th</sup> July 2017.

5.16 A city-wide consultation on the Local Plan Pre Publication Draft (Reg 18) commenced on the 18th September 2017 and finished on 30th October 2017. During the consultation period the Council received responses from circa 1,295 individuals, organisation or interest groups. Given that those responding tend to raise multiple points this equates to around 4,000 representations

5.17 The City of York Local Plan Pre-Publication Consultation Statement (February 2018) which is Annex 13 to this report summarise this Pre-Publication consultation; it outlines the consultation documents that were produced, sets out who was consulted, the methods and techniques used during the consultation and summarises the main issues raised in the responses received. Summary tables of the comments received to this consultation can be found using the following web link:  
[https://www.york.gov.uk/downloads/download/4256/local\\_plan\\_pre-publication\\_consultation\\_summary\\_tables](https://www.york.gov.uk/downloads/download/4256/local_plan_pre-publication_consultation_summary_tables)

5.18 A summary of how people were invited to make representations on the Local Plan Pre-Publication consultation is set out below:

- a press release to advertise the consultation and how to respond was issued 15<sup>th</sup> September 2017;
- all documents and response forms were made available online at [www.york.gov.uk/localplan](http://www.york.gov.uk/localplan) and on the main City of York website consultation finder;
- hard copies of all the consultation documents, exhibition boards and response forms were placed in West Offices Reception; it was also possible for those who required hard copies to ring or email the forward planning team and request a copy of the documents;

- hard copies of all the consultation documents and response forms were placed in Council libraries for the duration of the consultation. In accordance with the SCI, all CYC libraries held a hard copy of the main Pre-Publication draft document, the proposals maps and a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Summary. All other supporting documents were available to view online, with the help of guidance notes provided.
- An 8-page Local Plan Special Edition of Our City delivered to every household in York via Our Local Link, with area based maps and free post response form;
- email or letter to all contacts registered on Local Plan database, including members of the public, statutory consultees, specific bodies including parish councils and planning agents, developers and landowners;
- staffed drop-in sessions/public exhibitions at venues across the City (see below);
- exhibition boards and consultation documents including response forms available at ward committee meetings;
- meetings with statutory consultees<sup>1</sup> and neighbouring authorities;
- presentation and question and answer session with York branch of the Yorkshire Local Council Association (attended by Parish Councils), York Property Forum/Chamber of Commerce and the Environment Forum; and
- targeted social media campaign via Facebook and Twitter running for the duration of the consultation.

5.19 There were several ways in which people and organisations were able to comment on the consultation documents. These were by:

- filling in the comments form (available on the Council's website, on the back page of the city wide leaflet and at the libraries/west offices/exhibitions);
- writing to the Local Plan team, via a freepost address;
- emailing the Local Plan team; or
- using the Council's online 'Current Consultations' tool (Survey Monkey) and completing an online response form with questions, via the Council's website.

5.20 A series of targeted meetings and exhibitions were arranged to publicise the consultation and engage with interested parties. The dates and venues of the public exhibitions were included in the city-wide publication of Our City. The exhibitions were staffed by officers and provided the opportunity for members of the public to find out about the

consultation. Consultation material and area based maps were also available to view. The City was split into five areas for the purpose of the maps to be contained in Our City (the follow the rivers/main roads to avoid dividing sites/residential areas). Eight public exhibitions were held across the city, each staffed by at least 2 officers and provided the opportunity for members of the public to find out about the consultation. Consultation material and area based maps were also available to view.

- Monday 2nd October at Strensall & Towthorpe Village Hall, Strensall (3pm- 7:30pm)
- Wednesday 4th October at Fulford Social Hall, Fulford (3pm 7:30pm)
- Thursday 5th October at Clifton Library, Clifton (3pm-7pm)
- Monday 9th October at Tang Hall Library, Tang Hall (3pm-7:30pm)
- Wednesday 11th October at West Offices, York City Centre (3pm-7:30pm)
- Monday 16th October at Acomb Explore Library, Acomb (3pm-7:30pm)
- Tuesday 17th October at York Sport, Heslington (3pm-7:30pm)
- Wednesday 18th October at Oaken Grove Community Centre, Haxby (3pm-7pm)
- A further exhibition was held at York College in the atrium on Thursday 19<sup>th</sup> October 2017 10am-2pm, specifically to target the views of young people.

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

5.22 A briefing session for Parish Councils was held on Wednesday 27th September 2017 with the York Local Council Association which included representatives from all Parish Councils across York.

5.23 Specific Consultees (approx. 100) including Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and Parish Councils were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. Meetings with these groups were also arranged during the consultation period.

5.24 All other consultees on our database, which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York (approx. 10,000), was sent an

email/letter informing them of the opportunity to comment and details of the web page and where to find more information.

5.25 All Members received a briefing note setting out the proposed consultation methods and details of the consultation at the start of the consultation period, and a copy of the main documents was placed in the Member's group rooms at the Council's West Offices.

5.26 All Directors, Assistant Directors and other relevant officers were sent details of the consultation and informed where they could view the documents.

5.27 In addition to the more formal approaches for cooperating with prescribed bodies and other relevant organisations, City of York Council has engaged on an ongoing basis through an extensive series of informal (but recorded) meetings with such bodies and organisations, on a largely one-to-one basis, in relation to the Duty to cooperate. These meetings took place as part of Pre-Publication consultation and are set out in the table under Paragraph 4.13 of Annex 13 to this report. In addition to these meetings, regular sub-regional or sub-area meetings, and meetings for specific projects, where formal minutes or notes are otherwise available, also took place as follows:

- Leeds City Region (LCR) Strategic Planning Duty to Cooperate Group
- LCR Community Infrastructure Working Group
- Local Government North Yorkshire and York (LGNYY) Spatial Planning and Transport Board
- LGNYY Spatial Planning and Transport Technical Officers Group (TOG)
- York Sub-area Joint Infrastructure Working Forum (YSAJIWF)
- North Yorkshire Development Plans Forum
- East Coast Mainline Authorities group (ECMA)
- ECMA Technical Officers Group
- Rail North (potential Rail Franchisor under decentralisation)
- Business Case for improving the York-Harrogate-Leeds line
- TransPennine Electrification
- Asset Board
- A64 Officer's

## **Publication Draft Local Plan Consultation (February, 2018)**

5.28 Following the Pre-Publication Consultation the responses were considered and a final Publication Draft Local Plan was produced. It was agreed by Members on 25<sup>th</sup> January 2018 that the Plan could be subject to public consultation. The consultation ran for 6 weeks from 21 February to 4 April 2018.

### **Who was invited to make representations**

#### **Specific Consultees**

5.29 Specific Consultees include Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and parish councils. This group of consultees (approx. 80) was sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. A list of these consultees is contained in Annex 14.

#### **General Consultees**

5.30 All other consultees on our database, which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York (approx. 10,000), were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. A copy of the letter is contained in Annex 15.

#### **Wider public**

5.31 Every household in York (over 87,000) received a leaflet promoting the consultation through their letterbox. The council's internal and corporate communications channels were also used, as well as distribution networks available via the communities and neighbourhoods team. A copy of the leaflet is contained in Annex 16

#### **Internal Consultation**

5.32 All Members, Directors, Assistant Directors and other relevant officers were sent details of the consultation and informed where they could view the documents.

#### **Accessible Information**

5.33 Key consultation documents were made available in accessible formats on request, including large print or another language.

#### **Duty to Cooperate**

5.34 Consultation with neighbouring authorities took place utilising existing structures through the Leeds City Region (LCR) and Local Government North Yorkshire and York (LGNYY) sub-regions, in both of which the City of York is a constituent local authority. The formal groupings within the LCR and LGNYY where issues relating to the Duty are raised are, primarily:

- Leeds City Region Planning Portfolios Board (Member Group)
- Leeds City Region Strategic Planning (DtC) Group (Officer Group)
- Leeds City Region Heads of Planning (HoP) (Officer Group)
- Leeds City Region Directors of Development (DoDs) (Officer Group)
- North Yorkshire and York Spatial Planning and Transport Board (Member Group)
- North Yorkshire, York and East Riding Heads of Planning (Officer Group)
- North Yorkshire, York and East Riding Directors of Development Group (Officer Group)
- North Yorkshire and York Spatial Planning and Transport Technical Officers Group (ToG) (Officer Group) (prior to Jan 2016 when replaced by HoP and DoDs)

5.35 Meetings took place with the Leeds City Region Planning Portfolios Board on 15<sup>th</sup> December 2017 and the North Yorkshire and York Spatial Planning and Transport Board on 17<sup>th</sup> January 2018 to discuss the Pre-Publication Draft Local Plan, in advance of the Publication Draft consultation. At both meetings, the approach taken in preparing the Plan was endorsed.

5.36 In addition, consultation with neighbouring authorities and other prescribed bodies has taken place through ongoing meetings with individual authorities and bodies since 2012. The last series of meetings on the Local Plan Publication Draft, February 2018 (Regulation 19 Consultation) was as follows:

- Environment Agency (15<sup>th</sup> March 2018);
- East Riding Council (3<sup>rd</sup> April 2018);
- Highways England (20<sup>th</sup> February 2018);
- Historic England (28<sup>th</sup> February 2018 and 28<sup>th</sup> March 2018);
- North Yorkshire County Council (16<sup>th</sup> March 2018);
- Ryedale District Council (26<sup>th</sup> March 2018);
- Selby District Council (22<sup>nd</sup> March 2018);

- York North Yorkshire & East Riding LEP (21<sup>st</sup> March 2018)

## **How people were invited to make representations**

### **Media**

5.37 The council communications team issued three media releases relating to the consultation; to mark the booklet distribution, the beginning of the consultation and one with a 'two weeks to go' reminder. The Local Plan has regularly appeared on the news agenda throughout the consultation, with council media releases, journalists' enquiries and the interventions of other stakeholders leading to at least ten articles in the York Press alone. York Mix, Minster FM and Radio York have also both covered the consultation and related issues. Details of these items are contained in Annex 17.

### **CYC Website**

- 5.38 A new 'Publication Draft Local Plan February 2018' consultation page linked from the 'Current Consultations' section on the Council homepage. The new webpage set out what the documents are, lists the consultation documents, give details of the consultation and how to respond.
- 5.39 The existing 'New Local Plan' webpage was also updated with all of the consultation details, links to downloads and the online consultation form.
- 5.40 In summary, the Local Plan landing page was viewed 7500 times during the consultation, including 4966 unique views.

### **CYC Libraries and WO Reception**

- 5.41 A set of hard copies of the consultation documents were placed in West Offices Reception and all CYC libraries.

### **Twitter Feed/Facebook**

- 5.42 The council's corporate social media accounts were used to publicise the consultation. Twitter and Facebook, including boosted facebook ads targeting adult facebook users in York, were used to publicise the start of the consultation and towards the end of the consultation period to make people aware that the deadline for comments is approaching. Video and image-led content was used to emphasise the scope of the consultation and explain the process.
- 5.43 In line with effective engagement strategies employed in previous consultations and campaigns, a £250 budget was be set aside to 'boost'

this content to make sure they reach an audience beyond those already engaged with the council.

5.44 In summary, posts were seen 40,626 times, prompting 3810 engagements (likes, comments, shares or clicks on the content).

### **Leaflets**

5.45 An A5 leaflet went to every household (over 87,000) in York. It was distributed by Your Local Link between 14 and 25 February.

### **Council Intranet**

5.46 Articles about the consultation were placed in the online internal newsletter throughout the consultation.

### **Method of Response**

5.47 There were several ways in which people and organisations were able to comment on the consultation documents. These were by:

- filling in the comments form (this was available electronically on our website, and as hard copies at West Office reception and at CYC libraries).
- using the Council's online 'Current Consultations' tool and completing an online response form with questions accessed from the Council's website.

A copy of the comments form is contained at Annex 18.

### **Consultation Documents**

5.48 All documents were available online on the Local Plan webpage and a full set of hard copies of the consultation documents were placed in West Offices Reception to be viewed. All CYC libraries held a hard copy of the Local Plan Publication document, the policies maps and a Sustainability Appraisal (SA/SEA) Non Technical Summary. All locations had the following consultation material:

#### **Main Documents**

- City of York Local Plan Publication Draft (February 2018)
- City wide policies maps (North/South/City Centre inset)
- Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

N.B. Background evidence which has informed the Local Plan was published on a new evidence base webpage.



### Consultation Material

- Comments form (electronic and hard copies)
- 8 page city-wide leaflet
- Poster (Annex 19)
- Statement of Representations Procedure (including Statement of the Fact) (Annex 20)

### Responses

5.49 During the Regulation 19 consultation period we have received responses from circa 850 individuals, organisation or interest groups, this equates to approximately 5,000 separate comments. One petition was received as part of this consultation. This contains 1149 signatures in opposition to a proposal for a 'substantial housing development' being promoted by land owners between Stockton Lane and Malton Road.

5.50 All comments made will be submitted to the Planning Inspectorate for examination and will be made available on line on submission of the Plan.

5.51 A full index of all the respondents is contained at Annex 21, along with a Sequential Identification number (SID) which relates to their individual responses.

5.52 Annex 22 to this report contains summary tables in Plan order which contain a summary of each comment received. The summary of responses has been prepared by Officers to provide a guide to highlight the broad issues raised during this stage of consultation. It should not be taken as a substitute for the full and comprehensive set of all duly made representations. A full set of representations will be publicly available from the Programme Officer's library, and available to view on the Council's website once the Plan is submitted.

## **6.0 Main Issues Raised during Regulation 19 Consultation**

6.1 A set of tables below para. 6.17 identify the main issues by Plan theme, raised at Regulation 19. In brief, these include:

6.2 *General, Background, Vision and Development Principles*

- A number of comments state that the plan is not considered sound or legally compliant as it does not comply with elements of the NPPF,

particularly in regard to the approach to the green belt. (See 'Spatial Strategy' below for further detail).

- Those who consider the Plan sound offer additional points of clarification, particularly regarding aspects of policies relating to strategic sites. This includes:
  - Ryedale District Council
  - Selby District Council, noting that both authorities are committed to meeting their objectively assessed housing need;
  - Hambleton District Council;
  - York, North Yorkshire and East Riding LEP, which considers the plan to be both legally compliant and sound, noting the imperative to move to adoption quickly to allow housing and employment targets to be delivered;
  - Historic England support the approach to managing growth which limits impact on the special character and setting of the City (note, EH raise several soundness issues re individual strategic sites);
  - Huntington Parish Council
  - Earswick Parish Council
  - Strensall with Towthorpe Parish Council
  - Internal Drainage Board (noting specific issues regarding surface water drainage)
- Both Harrogate Borough Council and North Yorkshire County Council highlight the need for York's Plan to set an enduring green belt boundary and meet its full OAHN. NYCC further comments on need for the Plan's Mineral and Waste policies to reflect the North Yorkshire and York Minerals and Waste Joint Plan.

### 6.3 *Spatial Strategy including Strategic Sites*

- Many residents support the principle of a Plan establishing a permanent Green Belt boundary and the approach taken in removing identified areas of safeguarded land from the Plan. Planning agents and developers argue that the boundary is too tightly drawn and will not endure beyond the plan period, ie not provide permanence. They further comment that the Plan is overly reliant on development from a few strategic sites (notably York Central) which may not deliver as anticipated.
- Responses from planning/property agents tend to raise objection to the Plan's annual housing target of 867 units, which reflects neither the SHMA evidenced by independently appointed consultants nor the emerging DCLG methodology. Many believe the Plan to be unsound on this basis.

- The majority of the developers and landowners with interests in the strategic sites support the allocations in principle. However, several request amended boundaries and/or an increase in yield for their sites including ST4, ST7, ST8, ST14, ST15, ST16, and ST31.
- While supporting the general principle of a development strategy which limits peripheral growth to safeguard key elements of the City's special character, Historic England raise concerns regarding the impact of specific strategic sites (including York Central and University of York expansion) on the historic character and setting of the City. Several other respondents question the soundness of including specific sites, the details of which are set out in Annex 22. This includes Osbaldwick Parish Council, Wheldrake Parish Council, Haxby Town Council, Fulford Parish Council, Elvington Parish Council, Heslington Parish Council, Upper and Nether Poppleton Parish Councils
- East Riding of Yorkshire Council question whether the scale of ST15 is sufficient to deliver necessary supporting infrastructure. On the whole, responses received from local residents in relation to strategic sites tend to raise soundness concerns relating to reasons of impact on surrounding roads, drainage, wildlife, schools and other infrastructure.
- Natural England identified concerns including the need for a final HRA, along with potential impacts on Strensall Common SAC and in relation to ST15.

#### 6.4 *Economy and Retail*

- Most objections deem the amount of land allocated for employment use inadequate as it does not match the City's ambitions for economic growth, particularly in B1a terms.
- Concern that reliance on few large sites does not provide a variety of choice and or the allocated land will not provide sufficient employment for new residents over the course of the plan.

#### 6.5 *Housing including Housing Allocations*

- Some alternative sites have been submitted and will be presented to the Inspector for consideration;
- Support for the overall soundness of the policy. Those opposing the general thrust of policy raise the following issues:
  - non-conformity with NPPF para 182;
  - the Plan is not able to demonstrate a 5-year supply upon adoption;
  - the methodology behind site selection is not sufficiently detailed;
  - the inclusion of off campus student housing commitments and completions is inappropriate in determining housing supply;

- noting the above, that the inclusion of windfalls is not a plan led approach and could create uncertainty leading to under-delivery.
- Some respondents question how the proposed densities have been calculated. It is argued that high densities will result in flatted development which is not needed in York.
- Whilst some respondents support the flexibility provided in relation to housing mix, other suggest that greater flexibility is required on a site-by-site basis.
- Whilst many local communities support the approach to Gypsy and Traveller provision, some are concerned that the proposed policies fail to satisfy national policy in terms of deliverability through strategic sites and will therefore not fully meet the needs of the travelling community.
- Developers ask that clarification should be provided as to how the demand for gypsy and traveller pitches within new housing developments has been assessed. York Travellers Trust consider the Plan neither legally compliant nor sound in underestimating G+T need, and that it fails its duties under the 2010 Equality Act by not allocating sites.
- Respondents ask that the policies for student accommodation and HMOs are strengthened

#### Site comments:

- Generally, developers and landowners support the allocation of their sites in principle, although amended boundaries and/or yields and increased flexibility are suggested for H31, and H59.
- Some local residents wish to see lower densities on sites to reduce their impact on infrastructure and existing residents.

### 6.6 *Health and Wellbeing*

- The majority of respondents make reference to the fact that the issue of the retention and re-use of existing community assets is of the utmost importance in the delivery of the plan and that a strengthening of policy in respect of evidence underpinning their use or re-use is required.
- Several respondents feel that further clarification on the level of developer contribution required is needed.

### 6.7 *Education*

- Support for the Plan's recognition of the role of the city's Universities in delivering economic growth. Some concern that the Plan does not provide sufficient land for the University of York to grow.

- Some respondents feel that any proposals for development at the University of York should mitigate the effects of housing, traffic and parking to lessen the impact on local communities

#### 6.8 *Placemaking, Heritage, Design and Culture*

- In general these policies are supported by respondents.
- Some developers feel that there is too much emphasis on developer contributions and that the responsibility for placemaking and culture lies with the Council.

#### 6.9 *Green Infrastructure*

- Several developers feel that further detail and clarification on the level of developer contribution is required.
- Many responses related directly to the provision of new open space sites OS1-OS12 which are generally supported by local residents

#### 6.10 *Managing Appropriate Development in the Green Belt*

- Whilst the Green Belt policies are generally supported, some respondents feel that they are overly restrictive and offer little opportunity for rural businesses.

#### 6.11 *Climate Change*

- Some developers argue that energy requirements for new housing developments are solely the remit of Building Regulations and the Plan should not be imposing more onerous requirements on developments. In particular, several state that the requirements to achieve BREEAM 'excellent' rating is unduly restrictive and may render schemes unviable.

#### 6.12 *Environmental Quality and Flood Risk*

- Some respondents consider that these policies are not strong enough in relation to air quality, flooding and drainage.
- Some developers state that further detail and clarification is required on the extent of developer contribution.

#### 6.13 *Waste and Minerals*

- Detailed minerals and waste policies are contained in the Minerals and Waste Joint Plan. Any policies in the York Local Plan must ensure that they are consistent with strategic policies in the MWJP.

#### 6.14 *Transport and Communications*

- Some respondents consider that the current upgrades to the A1237 outer ring road are inadequate and that the road needs to be duelled

- It was highlighted that the connectivity and capacity of the current cycle and pedestrian networks need to be addressed
- Comments about communications infrastructure refer to new development schemes needing to be future proofed to facilitate the provision of mobile, broadband and wireless communications infrastructure, including in the public realm and within private buildings.
- Overall, several respondents request further detail on policy implementation and required developer contributions.

6.17 The tables below contain a more comprehensive summary of the main issues raised during the Regulation 19 Consultation on the Publication draft Local Plan. These are broken down into:

- Table 1: Main Issues Raised by Prescribed Bodies
- Table 2: Main Issues Raised by Adjacent Local Authorities
- Table 3: Main issues Raised about the SA/SEA
- Table 4: Main issues Raised in Plan Order

6.18 These summaries have been prepared by Officers to provide a guide to highlight the broad issues raised during this stage of consultation. It should not be taken as a substitute for the full and comprehensive set of all duly made representations. A full set of representations will be publicly available from the Programme Officer’s library, and available to view on the Council’s website once the Plan is submitted. Annex 22 to this report contains a summary of all comments raised, set out in Plan order.

**Table 1: Main Issues Raised by Prescribed Bodies**

Prescribed Body	Main Issues Raised
<b>Natural England</b>	<ul style="list-style-type: none"> <li>• Raise a number of concerns about the lack of final assessment for the Conservation of Habitats and Species Regulation 2017 (HRA);</li> <li>• Advises that the SA should be updated following the conclusions of an updated HRA when that information becomes available. The SA should also be updated once additional air quality assessments that address the impact of traffic emissions on nationally and internationally designated sites has been completed;</li> <li>• The information provided in relation to the assessment of recreational disturbance and urban edge effects upon Strensall Common SAC and SSSI is insufficient, making</li> </ul>

	<p>the Plan unsound;</p> <ul style="list-style-type: none"> <li>• Welcome the requirements set out in Policy SS19 that relate to Strensall Common, however, do not consider that sufficient evidence is available to judge whether such measures would be sufficient to avoid adverse effects on the integrity of the SAC or damage to the SSSI;</li> <li>• Outstanding concerns regarding the potential for functional linkages between birds found on ST15 and the Lower Derwent Valley Special Protection Area;</li> <li>• Welcomes policy SS13 which sets out the necessary compensation and mitigation measures in the context of the conclusions of the SA, concerning the preferred Spatial Strategy and Site ST15,</li> <li>• Welcomes policy GI2, but recommends the consideration of references to the protection afforded to internationally and nationally designated sites in line with paras 113 and 117 of NPPF and the policy is updated to clarify around how windfall sites are treated;</li> <li>• Recommends that the policies map is updated to clearly distinguish between nationally and internationally designated sites of ecological value;</li> <li>• Advise including a specific reference to the protection of best and most versatile agricultural land. Also advise specific reference to the importance of protecting wider soils resources including in relation to ecosystem services such as carbon storage and their role in flood prevention;</li> <li>• Consider including protection for ancient woodland and veteran trees in Policy GI4, in line with para 118 of NPPF;</li> <li>• There are a number of woodlands on the Ancient Woodlands Inventory within the CYC area which should be included on the Policies Map;</li> <li>• ST15 has had various boundary changes through the different drafts of the Local Plan, and a great deal of evidence has been gathered but not made public, this should be published to clarify what evidence is relevant to various boundaries and amendments;</li> <li>• Welcome the assessment against Objective 8 in the SA, which is detailed and accurate. Agree with the scoring and weighting applied.</li> </ul>
<b>Historic England</b>	<ul style="list-style-type: none"> <li>• Welcome the intention to limiting the amount of growth which is proposed around the periphery of the built-up area of the City to safeguard key elements identified in the</li> </ul>

	<p>Heritage Topic Paper as contributing to the special character and setting of the historic city.</p> <ul style="list-style-type: none"> <li>• The new free-standing settlements – as a strategy for accommodating York’s development needs, new free-standing settlements will result in far less harm to the special character and setting of the historic city than would be caused by development on the edge of the existing built-up area of the City. The plan should set out its development strategy more clearly.</li> <li>• York Central - support the redevelopment of this brownfield site, but are concerned about the potential impact the level of development might have upon the city’s heritage. No evidence base to support 2,500 dwellings and 100,000sq m of office floorspace which would not result in adverse impact on City’s infrastructure, traffic, and heritage.</li> <li>• The University - concerned about the area identified for the future expansion of the University and feel further consideration is needed to safeguard the elements which contribute to the setting of the City.</li> <li>• Other Strategic Sites - several of the sites do not appear to have taken account of the elements which the Council has identified as contributing to York’s special character.</li> <li>• Various suggested amendments to policies and sites.</li> </ul>
<p><b>Environment Agency</b></p>	<ul style="list-style-type: none"> <li>• Comment that the Plan is not legally compliant or sound, but that this would be ameliorated by including additional text to require developers to meet the requirements of the Water Framework Directive.</li> <li>• Several further detailed comments, including suggested modifications, regarding sites: <ul style="list-style-type: none"> <li>- H7, to further distinguish between areas allocated for open space and student housing in terms land within Flood Zone 3b;</li> <li>- ST20, raising no concerns to the principle of multi-storey parking at St Georges Field, providing that development does not increase flood risk vulnerability. However, EA do not support any development in the Foss Basin, with the possible exception of water compatible uses, subject to detail. As such they do not consider it appropriate to include the Foss Basin within the ST20 site allocation and that the Local Plan should not be adopted with this allocation included.</li> </ul> </li> </ul>



<p><b>Highways England</b></p>	<ul style="list-style-type: none"> <li>• The A64 should be included within the plan definition of York’s strategic road network.</li> <li>• HE can confirm that a new access on the A64 has been agreed in principle to serve land west of Elvington Lane as highlighted in Policy T4. The junction layout is not yet agreed and is subject to approval of acceptable proposed alignment and design.</li> <li>• Policy SS4 (York Central) should include reference to the A64 Hopgrove Roundabout improvement (A64/A1237) that is currently in preparation, with the aim of inclusion for implementation in the next roads period.</li> <li>• HE is supportive of the principle stated in Policy T7 that strategic development sites must specifically identify any traffic impacts on the A64 arising from proposed development, individually and in combination with other strategic sites, and any mitigation including physical capacity enhancements required. These must be agreed with HE and neighbouring authorities as appropriate.</li> <li>• HE expect 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 the A64 east and west of York. We will therefore need to have a good understanding of that cumulative impact and the scale and nature of any improvement required if we are to be able to state that the Plan is sound</li> <li>• The plan contains strong policy direction on sustainable transport. However, sustainable transport provision in isolation is insufficient to accommodate York’s development aspirations, and both demand management and physical capacity improvements will be required.</li> </ul>
<p><b>National Federation of Gypsy and Traveller Liaison groups</b></p>	<ul style="list-style-type: none"> <li>• Support the policy, asks that H5 (policy) specifically recognise that the requirement for pitches will be kept under regular review and ensure that sites remain available to travellers.</li> </ul>
<p><b>York Travellers Trust</b></p>	<ul style="list-style-type: none"> <li>• Considers that the Plan underestimates Gypsy and Traveller need, nor provides for sites in the green belt, and is not legally compliant with the 2010 Equality Act;</li> <li>• Suggests modifications, including: <ul style="list-style-type: none"> <li>- Detailed changes to H5 to reflect higher levels of need;</li> <li>- Plan should identify specific sites or broad locations to accommodate Gypsy and Traveller housing need;</li> <li>- SS2 – should allow for safeguarded land, including for</li> </ul> </li> </ul>

	Gypsy and Traveller communities.
<b>Osballdwick Parish Council</b>	<ul style="list-style-type: none"> <li>• Considers that the Plan uses of out-of-date mapping which does not properly show the extent of development boundaries (notably omitting Derwenthorpe);</li> <li>• Suggests modifications, including: <ul style="list-style-type: none"> <li>- An Environmental Capacity Study should be undertaken to support the Plan.</li> <li>- ST4 should be removed from the Plan due to its elevated presence in open countryside, traffic concerns, open space and wildlife value;</li> <li>- ST7 should be removed from the Plan and retained as green belt in permanence; the site is important to the historic character and setting of the city, developers deem it unviable and there are significant environmental concerns;</li> <li>- ST15 should be promoted as a self sustaining new town;</li> <li>- ST27 must require the increase in student numbers to be accommodated on site in full to avoid further disruption to the housing market; similarly, H7 should require all HE establishments to accommodate student housing growth on campus;</li> <li>- H8 - reduction in the acceptability threshold percentages halved for both neighbourhood and street level thresholds;</li> <li>- Identify green burial site in Osballdwick;</li> <li>- Clarify role of 'Streetscape Strategy and Guidance'.</li> </ul> </li> </ul>
<b>Coal Authority</b>	<ul style="list-style-type: none"> <li>• No comments</li> </ul>
<b>York, North Yorkshire and East Riding Local Enterprise Partnership</b>	<ul style="list-style-type: none"> <li>• Considers the Plan to be Legally Compliant and generally sound, with the following issues: <ul style="list-style-type: none"> <li>- The Plan should be advanced quickly to adopted, to enable at least the 867 per annum homes to be delivered;</li> <li>- ST5 York Central is an increasingly important site, and the increased planned target of 100,000sqm B1a office space is welcomed;</li> <li>- Welcome funding from West Yorkshire Combined Authority to dual the A1237.</li> </ul> </li> </ul>
<b>Wheldrake Parish Council</b>	<ul style="list-style-type: none"> <li>• Residents feeling that their submissions with regards to the previous consultation period have not been taken into account;</li> <li>• Objection to site SS18 (ST33), as feel that would place an unacceptable and unjustifiable pressure on the current infrastructure and services. The proximity to the development to the industrial estate is also an issue. A significant proportion of ST33 is located on good quality agricultural land and also on green belt.</li> <li>• Objection to site SS13 (ST15) as the residents do not feel they have been properly consulted regarding their</li> </ul>

	<p>needs.</p> <ul style="list-style-type: none"> <li>• ST15 should be amended to reflect the developers viable, sustainable and ecologically friendly site option;</li> <li>• E8 should be removed from the plan or designated as green space within the village;</li> </ul>
<b>NHS Property Services</b>	<ul style="list-style-type: none"> <li>• Clifton Park Hospital Site could accommodate a mixed used scheme that could meet the identified need for additional housing sites in York.</li> <li>• The LP Housing Requirement, as the updated SHMA figures were rejected by CYC. PDLP provides 3,248 homes less than minimum calculated using government's standardised methodology. PDLP approach to dealing with housing shortfall is incorrect and unsound.</li> <li>• Placing Clifton Moor Hospital Site in Green Belt as sites does not perform any of Green Belt purposes set out in Paragraph 80 of NPPF.</li> <li>• If it is considered that additional housing sites are required to ensure an adequate supply for the Government's OAN, have submitted representations to put forward three sites for consideration as windfall sites.</li> <li>• Supports HW1, which seeks to protect existing community facilities.</li> <li>• Supports H1 - the consultation Plan identifies that CYC have five spatial principles. The redevelopment of land at Peppermint Court can be considered to be in line with these strategies.</li> <li>• Suggests modifications, including: <ul style="list-style-type: none"> <li>- Should any part of the Peppermill Court, Cherry Tree House or Limetrees site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5 - 10 years.</li> <li>- Limetrees site does not contribute to the purposes of the green belt.</li> </ul> </li> </ul>
<b>Haxby Town Council</b>	<ul style="list-style-type: none"> <li>• Considers the Plan to be Legally Compliant</li> <li>• Considers that ST9 should be deferred until the improvements to the A1237 have been completed. Notes other concerns re sewerage and drainage, school and health care provision, and impacts on landscape.</li> </ul>
<b>National Grid</b>	<ul style="list-style-type: none"> <li>• Considers that several sites cause the Plan to be unsound due to preferring that buildings are not built directly beneath its overhead lines due to occupiers of properties being in the vicinity of lines, and because National Grid needs quick and easy access to carry out maintenance. Sites that cross or in close proximity to National Grid infrastructure are ST1 -British Sugar/Manor School and ST7 - Land East of Metcalfe Lane.</li> </ul>

<b>Fulford Parish Council</b>	<ul style="list-style-type: none"> <li>• Considers the Plan to be Legally Compliant.</li> <li>• SS1 – that the Plan should set a target of 706 dwg/annum;</li> <li>• SS2/GB1 – green belt should not be set by using the residual land once development needs have been accommodated. Should instead reflect NPPF;</li> <li>• Delete ST15 – land provides an important green belt function, including the separation of Elvington from the main urban area;</li> <li>• Delete ST4 - land provides an important green belt function, and the presence of the University is being used to justify further development of open land;</li> <li>• Delete ST36 – site should be considered as part of the Plan’s review, as it is unlikely to start before the end of the Plan period;</li> <li>• Undue concentration of major development in the SE quadrant of the city. Cumulative impact of these proposals would cause harm to this area of the city. There would not only be a significant loss of open land and visual outlook but also greatly increased traffic congestion, traffic noise, air pollution and community severance;</li> <li>• Modifications to other Housing policies, including to H8 re HMO thresholds.</li> </ul>
<b>Network Rail</b>	<ul style="list-style-type: none"> <li>• Considers the Plan Legally Compliant.</li> <li>• Requests modifications to policies governing ST1 and ST2, to note site’s proximity to the Millfield Lane level crossing and the need to minimise new pedestrian, cycle and vehicular traffic because of the crossing’s high risk rating.</li> </ul>
<b>Huntington Parish Council</b>	<ul style="list-style-type: none"> <li>• Considers the Plan Legally Compliant and generally sound.</li> </ul>
<b>Earswick Parish Council</b>	<ul style="list-style-type: none"> <li>• Considers the Plan sound.</li> <li>• Supports SS1, particularly that no safeguarded land is allocated and that permanent green belt boundaries will be established;</li> <li>• ST35 – highlighting the potential for traffic impacts.</li> </ul>
<b>Strensall with Towthorpe Parish Council</b>	<ul style="list-style-type: none"> <li>• Considers the Plan is legally compliant and generally sound.</li> <li>• Supports Plan’s housing target, in preference to the overestimated DCLG target of 1070/annum;</li> <li>• Supports reduced housing target on ST35, but has concerns in particular regarding infrastructure requirements and site access;</li> <li>• ST9 should be removed from the Plan or its site significantly reduced given likely traffic and infrastructural impacts.</li> </ul>
<b>Elvington Parish</b>	<ul style="list-style-type: none"> <li>• General concern that the Plan does not reflect local public</li> </ul>

<p><b>Council</b></p>	<p>need.</p> <ul style="list-style-type: none"> <li>• ST15 – would support the site in its previous location, closer to the A64;</li> <li>• Development of H39 raises Green Belt issues; site should be deleted and replaced with H26 Dauby Lane;</li> <li>• Plan should uphold the Inspectors previous decision re SP1;</li> <li>• Conditional support for ST26 and E9</li> </ul>
<p><b>Heslington Parish Council</b></p>	<ul style="list-style-type: none"> <li>• Comments that the Plan is not legally compliant, as it is not clear the Council has provided the proof of “exceptional” circumstances to support green belt land releases.</li> <li>• Suggest that the University of York’s Campus East has the potential to provide all further identified university uses, by using the site more intensively, in preference to ST27;</li> <li>• Heslington Parish Council would welcome full and well-justified reasons as to why the development (ST27) has been put-forward as being necessary in the proposed location for further university uses that cannot be incorporated into the two existing campuses, particularly given the land’s green belt status;</li> <li>• HPC would like to see the cumulative traffic flow impacts from local proposed developments - ST15, ST27, H56 and the ST4 analysed by CYC/Developers to evidence that there will be no adverse traffic congestion for Hull Road, Field Lane, University Road and Heslington Lane.</li> <li>• There is no proof that mitigation can compensate for the impacts of ST15, including on productive farmed land of the best and most versatile arable land, infrastructure that will join already highly congested roads; pollution damage: water, air, soil, noise, light, increased footfall and pet predation, to these two highly sensitive areas and irreplaceable habitats. This is a “stand alone” site that requires extensive mitigation measures and infrastructure.</li> </ul>
<p><b>Upper and Nether Poppleton Parish Councils</b></p>	<ul style="list-style-type: none"> <li>• Raise a number of concerns relating to the soundness of the Plan.</li> <li>• The expansion of Northminster Business Park is too great, and not supported by the Neighbourhood Plan;</li> <li>• Poppleton Garden Centre should remain as an asset to the area; if the site is to be developed, the Parish Council’s only support development of the existing built footprint;</li> <li>• The Plan lacks an integrated Transport Strategy – questions the loss of proposed rail halt for York Business Park, and lack of discussion around cumulative impact of development on the transport network;</li> <li>• More evidence/assessment required to understand the cumulative impact of proposed development on the City’s</li> </ul>

	<p>historic character and setting, open space, education provision and natural environment;</p> <ul style="list-style-type: none"> <li>• SS2 does not properly describe the role of York’s green belt.</li> </ul>
<b>Internal Drainage Board</b>	<ul style="list-style-type: none"> <li>• Comments that the Plan is sound, subject to some specific comments around managing surface water drainage. The Board believes that, in an area where drainage problems could exist, development should not be allowed at any location until the Local Authority is satisfied that surface water drainage has been satisfactorily provided for. In addition the Board does not consider that development within Flood Zone 3 is desirable or sustainable in the longer term.</li> </ul>
<b>York Civic Trust</b>	<ul style="list-style-type: none"> <li>• Believes plan to be legally compliant.</li> <li>• Considers Plan to be unsound because:</li> <li>• No evidence to justify 15% target of journeys by public transport on new developments and no target offered for cycling and walking.</li> <li>• Transport policy statements in the draft Local Plan need to be justified. Suggests amendments.</li> <li>• References to future transport-related documentation makes it impossible to judge potential effectiveness.</li> <li>• Design standards and policy thresholds are not specified (To be set out in Supplementary Planning Document).As a result it is impossible to judge the potential effectiveness and soundness.</li> <li>• ST14 and ST15 may not comply with NPPF.</li> <li>• Inconsistencies with information provided regarding statutory consultees required for listed building consent applications, e.g. ‘English Heritage’ rather than ‘Historic England’.</li> <li>• Suggests various modifications to policies, such as T2, T4, T5, T8, DP2, DP3, ST14, D4, D5 and D7.</li> </ul>

**Table 2: Main Issues Raised by Adjacent Local Authorities**

<b>Local Authority</b>	<b>Main Issues Raised</b>
<b>Ryedale District Council</b>	<ul style="list-style-type: none"> <li>• No issues raised, support the housing sites proposed and feel they have been suitably involved in the process.</li> </ul>
<b>Selby District Council</b>	<ul style="list-style-type: none"> <li>• Both Selby and York have agreed to meet their own objectively assessed housing need within their own authority boundaries. Seeks assurance through the LP that York is able to meet its own housing requirements.</li> </ul>

<b>Hambleton District Council</b>	<ul style="list-style-type: none"> <li>• Generally support the Local Plan.</li> </ul>
<b>East Riding of Yorkshire Council</b>	<ul style="list-style-type: none"> <li>• Unclear whether (Land West of Elvington Lane) would be sufficient to deliver the necessary supporting infrastructure outlined in Policy SS13. Does not consider policy unsound but needs further clarification within the plan to outline how this strategic allocation will be delivered, including provision of services;</li> <li>• Costs of the services have not been clarified in other policies. Suggests it may be helpful to include viability of essential infrastructure and the costs and mechanisms for securing funding.</li> </ul>
<b>Harrogate Borough Council</b>	<ul style="list-style-type: none"> <li>• HBC is planning to deliver a step change in housing delivery in order to meet in full its objectively assessed need. It is not making provision to deal with undersupply elsewhere;</li> <li>• Concerns over longevity of York's green belt boundary.</li> </ul>
<b>North Yorkshire County Council</b>	<ul style="list-style-type: none"> <li>• Welcome commitment in SS1 to development not leading to environmental problems and transport congestion for neighbouring authorities;</li> <li>• Note that the plan whilst delivering higher housing numbers than has been achieved over the last 10 years, does not make any additional uplift to the OAN for market signals;</li> <li>• If Green Belt boundary is too inflexible may result in pressure for growth on areas in NY. Want to avoid this to avoid adverse effects on NY infrastructure and services;</li> <li>• Plan needs sufficient provision of safeguarded land to meet future needs beyond the plan period;</li> <li>• Detailed minerals and waste policies are contained in the Minerals and Waste Joint Plan. Any policies in the York Local Plan must ensure that they are consistent with strategic policies in the MWJP.</li> <li>• Various comments from NYCC on their Strategic Transport Prospectus for North Yorkshire.</li> </ul>

**Table 3: Main issues Raised about the SA/SEA**

<b>Site/Policy Reference</b>	<b>Main Issues Raised</b>
<b>General Comments</b>	<ul style="list-style-type: none"> <li>• Support and agreement with City of York Council processes, procedures and justification;</li> <li>• SA methodology and analysis of alternative sites is flawed in respect of its treatment of Green Belt issues;</li> <li>• Contrary to Wildlife and Countryside Act 1981 - it is disturbing protected species and/or destroying their resting places and/or breeding grounds;</li> </ul>

	<ul style="list-style-type: none"> <li>• Contrary to the Natural Environment and Rural Communities Act 2006, section 40, to conserve biodiversity;</li> <li>• Justification required of policy choices in relation to results of SA and why policies have been rejected or progressed;</li> <li>• The plan strikes the right balance between providing the homes and jobs York needs while protecting the greenbelt &amp; historic character and setting of the city. General Support expressed;</li> <li>• Not compliant with NPPF Para 112. No ranking of land hierarchy in Green Belt;</li> <li>• Transportation issues: no new bus services to serve developments, address inward commutes, limited work in reducing need to travel, roads, air quality and 'i-travel York' needs extending more widely;</li> <li>• SA Indicators Obj 6 should be amended to include key local indicators that monitor sustainable travel behaviour and access to public transport services year on year.</li> </ul>
<b>SS1</b>	<ul style="list-style-type: none"> <li>• Housing figure too low. Concerned about the backlog. Failure to meet housing need has direct and negative impact on the economy.</li> </ul>
<b>SS2</b>	<ul style="list-style-type: none"> <li>• SA Criteria 1 – 4 does not include Green Belt, no justification of why all sites must score 22 and not all criteria of same importance;</li> <li>• Lack of clarity, definition and consistency in the application of Green Belt policy within the SA process;</li> <li>• Green Belt policy has been inappropriately subsumed and considered in an inadequate and inconsistent way in the SA, under the wider and less well defined (than Green Belt) concept of landscape protection.</li> </ul>
<b>SS10</b>	<ul style="list-style-type: none"> <li>• Review of SA for the proposed allocation and the alternative boundaries that have been put forward raises questions over the proposed boundary of ST8;</li> <li>• This site should form part of alternative site 914 as together these sites would naturally extend Huntington with the A1237 providing a strong defensible boundary.</li> </ul>
<b>SS11</b>	<ul style="list-style-type: none"> <li>• Overwhelming of local infrastructure, congestion and pollution. Sustainability not addressed in the plan;</li> <li>• Reduce the scale of the development, provide additional amenities, re-open Haxby railway station and increase bus services.</li> </ul>
<b>SS12</b>	<ul style="list-style-type: none"> <li>• Significant change in Sustainability Appraisal Scoring between Preferred Sites and Pre-publication consultations. ST14 not sustainably appropriate to take forward for allocation.</li> </ul>
<b>SS13</b>	<ul style="list-style-type: none"> <li>• Flaw in SA scoring system due to lack of local services near site;</li> <li>• Potential to disturb wildlife;</li> <li>• Creation of new infrastructure across virgin arable land is clearly contrary to the SA parameters for land use;</li> <li>• Full ecological survey undertaken;</li> <li>• All access to be via proposed new roadways;</li> <li>• Identify and justify loss of Green Belt land.</li> </ul>



<b>SS18</b>	<ul style="list-style-type: none"> <li>• Each SA objective inappropriately assessed for this site;</li> <li>• Remove site from plan, not suitable for development.</li> </ul>
<b>SS19</b>	<ul style="list-style-type: none"> <li>• Suggest changes in scoring for Objectives 9 and 13.</li> </ul>
<b>SS20</b>	<ul style="list-style-type: none"> <li>• Suggest changes in scoring for Objectives 6, 9 and 13.</li> </ul>
<b>ST9</b>	<ul style="list-style-type: none"> <li>• Issues with surface water drainage, impact on existing infrastructure, air pollution and quality of life;</li> <li>• Development should be focussed around Poppleton, not Haxby, due to greater infrastructure. Development in Haxby must see school expansion alongside road and drainage capacity improvements.</li> </ul>
<b>ST15</b>	<ul style="list-style-type: none"> <li>• Issues with existing infrastructure, HGV traffic, wildlife and housing affordability;</li> <li>• Contrary to NPPF: environment, pollution, land environmental value and ecological surveys;</li> <li>• SA08 &amp; SA09: issues raised;</li> <li>• Mitigation measure needs to occur 5 years before commencement, not 4 years;</li> <li>• Clearly identify number of hectares of Green Belt arable land required;</li> <li>• Pedestrian and cyclist access should run alongside vehicular access;</li> <li>• Full ecological survey undertaken;</li> <li>• Consideration on how to protect Grimston Wood.</li> </ul>
<b>ST33</b>	<ul style="list-style-type: none"> <li>• Infrastructure cannot cope with development and primary school needs expanding.</li> </ul>
<b>T2</b>	<ul style="list-style-type: none"> <li>• Insufficient operating centre opportunity to support bus or coach operations, either on new sites or by utilising or expanding upon existing operating centres;</li> <li>• Where existing operating facilities are situated, local planning policy appears to oppose the development, expansion or improvement of existing depot facilities with significant issues in gaining planning consent;</li> <li>• Current land classification and insufficient appropriate site opportunities coupled with increasing land costs result in a significant barrier to any potential new operating centre, either for incumbent or new operators to the York bus and coach market;</li> </ul>
<b>H1</b>	<ul style="list-style-type: none"> <li>• Site ST7: Alternative Site Size proposed: Option A: 845 houses in an area of 43.53ha, 60% net developable area 26.4Ha at 32dph;</li> <li>• Option 2. 945 houses on an area of 43.53Ha, 70% net developable area - 30.47 Ha net site area at 32dph;</li> <li>• Option 3: 1,225 Homes on an area of 57.27 Ha, 70% net developable area – 40.1 Ha net site area at 32dph.</li> </ul>
<b>H39</b>	<ul style="list-style-type: none"> <li>• Issues with Green Belt Assessments and SA Appendix J for site, inconsistencies in criteria and conclusions;</li> <li>• Development will have large effect on openness of landscape but will only make small contribution to housing target;</li> <li>• No settled Green Belt Policies undermines SA conclusions and that site is suitable for development;</li> </ul>

	<ul style="list-style-type: none"> <li>• H39 more acceptable than ST15.</li> </ul>
<b>H54</b>	<ul style="list-style-type: none"> <li>• Issues with building on Green Belt, wildlife habitats, capability of existing infrastructure, congestion and impact on quality of life.</li> </ul>
<b>H56</b>	<ul style="list-style-type: none"> <li>• Object to SA for site. HIA violating criteria 3 and 6. Lack of SEA.</li> </ul>
<b>H59</b>	<ul style="list-style-type: none"> <li>• Suggest changes in scoring for Objectives 5, 6 and 13</li> </ul>
<b>E18</b>	<ul style="list-style-type: none"> <li>• Open grassland enhances approach to village, makes industrial estate less intrusive and acts as village green. Building would degrade village.</li> </ul>
<b>E8</b>	<ul style="list-style-type: none"> <li>• Suggest changes in scoring for Objectives 3, 5, 6, 8 and 15.</li> </ul>

**Table 4: Main issues Raised in Plan Order**

<b>Main Issues Raised</b>	
<b>General Comments</b>	
<b>General Comments</b>	<ul style="list-style-type: none"> <li>• Many comments bring up the need for appropriate infrastructure prior to development across the whole of York in general, particularly the roads;</li> <li>• On the whole, respondents stated that the Plan was Legally Compliant but then made comments about specific areas of the Plan, namely site allocations;</li> <li>• Many comments support the plan as a whole stating that it meets the needs of the people in York, preserves green belt, heritage, villages;</li> <li>• Some comments state that the plan is not sound or legally compliant as it does not comply with elements of the NPPF and that the evidence base is not adequate.</li> </ul>
<b>Section 3: Spatial Strategy</b>	
<b>SS1: Delivering Sustainable Growth for York</b>	<ul style="list-style-type: none"> <li>• Responses from planning/property agents tend to raise objection to the Plan's annual housing target of 867 units, which reflects neither the SHMA evidenced by independently appointed consultants nor the emerging DCLG methodology. Many believe the Plan to be unsound on this basis.</li> </ul>
<b>SS2: The Role of York's Green Belt</b>	<ul style="list-style-type: none"> <li>• Many residents support the principle of a Plan establishing a permanent Green Belt boundary and the approach taken in removing identified areas of safeguarded land from the Plan. Planning agents and developers argue that the boundary is too tightly drawn and will not endure beyond the plan period, ie not provide permanence. They further comment that the Plan is overly reliant on development from a few strategic</li> </ul>

	<p>sites (notably York Central) which may not deliver as anticipated.</p>
<p><b>SS3-SS24 (Strategic Sites)</b></p>	<ul style="list-style-type: none"> <li>• While supporting the general principle of a development strategy which limits peripheral growth to safeguard key elements of the City’s special character, Historic England raise concerns regarding the impact of specific strategic sites (including York Central and University of York expansion) on the historic character and setting of the City. Several other respondents question the soundness of including specific sites, the details of which are set out in Annex 22. This includes Osbaldwick Parish Council, Wheldrake Parish Council, Haxby Town Council, Fulford Parish Council, Elvington Parish Council, Heslington Parish Council, Upper and Nether Poppleton Parish Councils</li> <li>• East Riding of Yorkshire Council question whether the scale of ST15 is sufficient to deliver necessary supporting infrastructure.</li> <li>• On the whole, responses received from local residents in relation to strategic sites tend to raise soundness concerns relating to reasons of impact on surrounding roads, drainage, wildlife, schools and other infrastructure.</li> <li>• Natural England highlight a number of outstanding concerns, including around the lack of a final assessment for the HRA, impacts on Strensall Common SAC and impacts at ST15.</li> <li>•</li> </ul>
<p><b>Section 4: Economy and Retail</b></p>	
<p><b>EC1: Provision of Employment Land</b></p>	<ul style="list-style-type: none"> <li>• Most objections deem the amount of land allocated for employment use inadequate as it does not match the City’s ambitions for economic growth, particularly in B1a terms;</li> <li>• Concern that reliance on few large sites does not provide a variety of choice and or the allocated land will not provide sufficient employment for new residents over the course of the plan;</li> <li>• The shortage of B1a use class in particular highlighted multiple times;</li> <li>• Several specific comments were received in relation to employment site allocations. Various responses from developers / businesses asking for specific use classes to be added to those permitted for their site.</li> </ul>
<p><b>EC2: Loss of Employment Land</b></p>	<ul style="list-style-type: none"> <li>• Some responses stated that more clarity is required on what is “compelling evidence to demonstrate that the site is no longer needed” and what is meant by “significant changes in the economic circumstances of the district”.</li> </ul>

<b>EC3: Business and Industrial Uses within Residential Areas</b>	<ul style="list-style-type: none"> <li>• The soundness of the policy is questioned as it does not recognise type of business that is incompatible with residential areas e.g. York Business Park has car sale businesses with high security next to an elderly care home which causes disruption.</li> </ul>
<b>EC4: Tourism</b>	<ul style="list-style-type: none"> <li>• York Racecourse considers this policy inconsistent within greenbelt designation that prevents their ambitions for expansion / hotel;</li> <li>• Similarly one rep mentions Sim Balk Lane as potential for developing more out-of-centre hotel capacity;</li> <li>• One comment expressing concern about loss of coach parking.</li> </ul>
<b>EC5: Rural Economy</b>	<ul style="list-style-type: none"> <li>• Some respondents consider that the aspirations and objectives of this policy are constrained by green belt policies.</li> </ul>
<b>R1-R4</b>	<ul style="list-style-type: none"> <li>• Question the use of the term 'neighbourhood parades' in the plan and the implications, inconsistent with NPPF;</li> <li>• Major retail compendiums raise concerns that the retail policies restricts their potential to grow;</li> <li>• Some support the existing Park and Ride being re-located to land south of the Designer Outlet as parking is an issue at busy times;</li> <li>• One objection to out-of-centre retailing in general because of the traffic it causes.</li> </ul>
<b>Section 5: Housing</b>	

<p><b>H1 (Policy): Housing Allocations</b></p>	<ul style="list-style-type: none"> <li>• Some alternative sites have been submitted and will be presented to the Inspector for consideration;</li> <li>• Support for the overall soundness of the policy. Those opposing the general thrust of policy raise the following issues: <ul style="list-style-type: none"> <li>○ non-conformity with NPPF para 182;</li> <li>○ the Plan is not able to demonstrate a 5 year supply upon adoption;</li> <li>○ the methodology behind site selection is not sufficiently detailed;</li> <li>○ the inclusion of off campus student housing commitments and completions is inappropriate in determining housing supply;</li> <li>○ noting the above, that the inclusion of windfalls is not a plan led approach and could create uncertainty leading to under-delivery.</li> </ul> </li> <li>• It is recommended by some that the council allocates more small sites than required to form a buffer to deal with under delivery, this would also provide choice and flexibility.</li> </ul>
<p><b>H2 (Policy): Density of Residential Development</b></p>	<ul style="list-style-type: none"> <li>• Some respondents question how the proposed densities have been calculated. It is argued that high densities will result in flatted development which is not needed in York;</li> <li>• Some feel that development densities in York City Centre and York Urban Area are optimistically high;</li> <li>• Supporting text needs to reference those elements that relate to gross and net densities e.g. open space, water attenuation etc;</li> <li>• Some feel that the densities are too high for rural villages and that urban brownfield sites should take even higher densities.</li> </ul>
<p><b>H3 (Policy): Balancing the Housing Market</b></p>	<ul style="list-style-type: none"> <li>• Whilst some respondents support the flexibility provided in relation to housing mix, other suggest that greater flexibility is required on a site-by-site basis;</li> <li>• Some raise concerns that the Plan includes several student sites in its future supply, which is inappropriate, as there is no justification regarding how these developments will result in the release of housing into the general housing market</li> <li>• It is felt by some that there is insufficient provision, protection and availability of social housing;</li> </ul>

<p><b>H4 (Policy): Promoting Self and Custom House Building</b></p>	<ul style="list-style-type: none"> <li>• Some developers feel that the Plan does not provide evidence and justification that supports 5% of plots on sites of 5 ha and above;</li> <li>• There is no evidence to suggest that people wanting to build their own home would want to live within a larger housing development;</li> <li>• The proposed approach only changes the type of house and does not contribute to boosting the supply of housing.</li> </ul>
<p><b>H5 (Policy): Gypsies and Travellers</b></p>	<ul style="list-style-type: none"> <li>• Several comments generally support the Plan's approach to the provision of sites to meet the needs of Travellers. Some state that they are grateful that the Council have listened and previously proposed allocated sites have been removed. Some feel that policy H5 does not reflect national policy;</li> <li>• Amongst other respondents, York Travellers Trust consider the Plan neither legally compliant nor sound in underestimating G+T need, and that it fails its duties under the 2010 Equality Act by not allocating sites.</li> <li>• It is highlighted by several developers that the provision of pitches for travellers as part of strategic housing allocations is an unusual approach and request that clarification should be provided as to how demand for pitches within new housing developments has been assessed and how this may compare with opportunities for individual pitches in the existing urban areas;</li> <li>• The policy should specifically recognise that the requirement for pitches will be kept under regular review and ensure that sites remain available to travellers;</li> <li>• It is argued that no detail is given on how the commuted sum towards the development of land would be calculated.</li> </ul>
<p><b>H6 (Policy): Travelling Showpeople</b></p>	<ul style="list-style-type: none"> <li>• Some respondents support the policy and consider that full consideration for the needs of Travelling Showpeople has been assessed;</li> <li>• It is considered by some that site SP1 is unsound as it constitutes 'inappropriate development in the Green Belt';</li> <li>• Other support the allocation, stating that it meets the needs identified in the evidence base.</li> </ul>

<b>H7 (Policy): Student Housing</b>	<ul style="list-style-type: none"> <li>• Several comments state that the Plan needs to make clear that Student Housing sits outside the OAN and Housing Supply;</li> <li>• It is highlighted that there is no mention of the increase in potential student accommodation at Askham Bryan College;</li> <li>• Some feel that the University of York, York St John University and Askham Bryan College should, to avoid further unbalance of the housing market in the areas of York close proximity to their campuses, be required to accommodate all increased numbers of students on campus;</li> </ul>
<b>H8 (Policy): Houses in Multiple Occupation</b>	<ul style="list-style-type: none"> <li>• Some feel that the policy needs strengthening; and</li> <li>• The policy should contain a restriction on extensions to existing and proposed HMOs.</li> </ul>
<b>H9 (Policy) : Older Persons Specialist Housing</b>	<ul style="list-style-type: none"> <li>• Some feel that whilst house builders can provide elderly persons housing under C3, the provision of extra care housing as a C2 class is more complex and policy H9 requires further clarification on what is required in terms of numbers and types and a demonstration of need.</li> </ul>
<b>H10 (Policy): Affordable Housing</b>	<ul style="list-style-type: none"> <li>• Some consider that the plan does not provide enough housing to meet projected need nor does it provide enough affordable housing;</li> <li>• Others generally support the provision of affordable housing and maintain that urban extensions provide the opportunity to help meet affordable housing requirements across the city;</li> <li>• Clarification is sought as to as to where off-site contributions from rural sites will go;</li> </ul>
<b>Section 6: Health and Wellbeing</b>	
<b>HW1: Protecting Existing Facilities</b>	<ul style="list-style-type: none"> <li>• Majority of respondents made reference to the fact that the issue of the retention and re-use of existing community assets is of the utmost importance in the delivery of the plan and that a reinforcement of these issues is needed in the policy;</li> <li>• Many respondents noted that the policy is not robust enough, particularly in respect of evidence required to support the use/reuse of a facility.</li> </ul>
<b>HW2: New Community Facilities</b>	<ul style="list-style-type: none"> <li>• Majority of respondents feel that the evidence base and viability assessment needs to be more rigorous and robust and that developer contributions and the types of facilities</li> </ul>

	should be made clearer;
<b>HW3: Built Sports Facilities</b>	<ul style="list-style-type: none"> <li>• Many respondents feel that more clarity is needed with regard to developer contributions and viability assessments;</li> </ul>
<b>HW4: Childcare Provision</b>	<ul style="list-style-type: none"> <li>• Majority of respondents feel that further clarification on the level of contribution required is needed;</li> <li>• Some of the respondents felt that that issues with evidence base and viability assessment needed addressing;</li> <li>• Many of the respondents objected to strategic sites being required to undertake an audit and believe that this is responsibility of the local authority;</li> </ul>
<b>HW5: Healthcare Services</b>	<ul style="list-style-type: none"> <li>• Majority of respondents objected to the requirement that a developer is required to undertake an assessment of accessibility and capacity at the application stage and that further detail on the extent of developer contributions is required.</li> </ul>
<b>HW6: Emergency Services</b>	<ul style="list-style-type: none"> <li>• Majority of respondents feel that further clarification on the level of developer contribution required is needed;</li> </ul>
<b>HW7: Healthy Places</b>	<ul style="list-style-type: none"> <li>• Majority of the respondents objected to the requirement that sites are selected on the grounds of being sustainable, that the need for such an assessment is negated by the allocation and that the policy should be deleted;</li> <li>• Some respondents feel that the HIA should be submitted with planning applications, not prior to them.</li> </ul>
<b>Section 7: Education</b>	
<b>ED1: University of York ED2: Campus West ED3: Campus East</b>	<ul style="list-style-type: none"> <li>• Support for the Plan's recognition of the role of the city's Universities.</li> <li>• Some concern that the Plan does not provide sufficient land for the University of York to grow;</li> <li>• Some respondents feel that policies ED1, ED2 and ED3 should be consolidated into one policy and reworded to reflect NPPF requirements;</li> <li>• It is considered by some that any proposals for development at the university should mitigate their impact on housing, traffic and parking.</li> </ul>
<b>ED4: York St. John University Lord Mayor's Walk Campus</b>	<ul style="list-style-type: none"> <li>• General support was received in relation to this policy.</li> </ul>



<p><b>ED6: Preschool, Primary and Secondary Education</b>  <b>ED7: York College and Askham Bryan College</b>  <b>ED8: Community Access to Sports and Cultural Facilities on Education Sites</b></p>	<ul style="list-style-type: none"> <li>• Several respondents feel that further detail and clarification on the level of developer contribution is required;</li> <li>• Some respondents feel that there are issues with schooling and impact on road infrastructure that need addressing;</li> </ul>
<p><b>Section 8: Placemaking, Heritage, Design and Culture</b></p>	
<p><b>D1: Placemaking</b></p>	<ul style="list-style-type: none"> <li>• Some of the respondents feel that the policy should include a caveat so that it is subject to deliverability and viability considerations and that any potential harm should be assessed against wider benefits;</li> </ul>
<p><b>D2: Landscape and Setting</b></p>	<ul style="list-style-type: none"> <li>• Many of the respondents have made reference to the fact that the policy make reference to York Landscape Character Appraisal and that they cannot locate it and request that City of York Council provide it in the Evidence Base Document.</li> </ul>
<p><b>D3: Cultural Provision</b></p>	<ul style="list-style-type: none"> <li>• Several developers object to the request that strategic sites will need to demonstrate that future cultural provision has been considered and provide a Cultural Wellbeing Plan as they believe this is a task only City of York Council can perform;</li> <li>• The policy is fully supported by some in relation to the promotion and protection of theatres.</li> </ul>
<p><b>D4: Conservation Areas</b></p>	<ul style="list-style-type: none"> <li>• Some of the respondents feel that the policy does not accord with the NPPF;</li> <li>• It is considered by some that more clarity should be provided to define the level of detail required at outline planning application stage for sites within or adjacent to conservation areas in terms of full design details required.</li> </ul>
<p><b>D5: Listed Buildings</b></p>	<ul style="list-style-type: none"> <li>• The policy is generally supported as it is in alignment with the NPPF.</li> </ul>
<p><b>D6: Archaeology</b></p>	<ul style="list-style-type: none"> <li>• The policy is generally supported.</li> </ul>

<b>D7: The Significance of Non-Designated Heritage Assets</b>	<ul style="list-style-type: none"> <li>Some consider that there is an absence of commitment from the Council to protect the city's non-designated heritage assets in the policy.</li> </ul>
<b>D8: Historic Parks and Gardens</b>  <b>D11: Extensions and Alterations to Existing Buildings</b> <b>D12: Shopfronts</b>	<ul style="list-style-type: none"> <li>The policies are supported.</li> </ul>
<b>D13: Advertisements</b>	<ul style="list-style-type: none"> <li>Some argue that the policy is unlawful and over-prescriptive.</li> <li>It is felt by some that a reference to temporary advertising, especially in reference to conservation areas should be added.</li> </ul>
<b>D14: Security Shutters</b>	<ul style="list-style-type: none"> <li>The policy is supported.</li> </ul>
<b>Section 9: Green Infrastructure</b>	
<b>G11: Green Infrastructure</b>	<ul style="list-style-type: none"> <li>Several respondents feel that the policy needs further detail and clarification on the level of developer contribution is required;</li> <li>Some respondents made site specific comments in relation to the policy and how revision of wording and revisions to the policies map is needed.</li> </ul>
<b>G12: Biodiversity and Access to Nature</b>	<ul style="list-style-type: none"> <li>Several respondents feel that the policy needs further detail and clarification on the level of developer contribution is required;</li> <li>Some respondents feel that the policy should include Local Nature Reserves as the NPPF does not have any specific mention of protecting these sites.</li> </ul>
<b>G13: Green Infrastructure Network</b>	<ul style="list-style-type: none"> <li>Several respondents feel that the policy needs further detail and clarification on the level of developer contribution is required;</li> </ul>
<b>G14: Trees and Hedgerows</b>	<ul style="list-style-type: none"> <li>General support for the policy;</li> <li>Several developers question as to why developer contribution is required to protect existing trees and hedgerows.</li> </ul>
<b>G15: Protection of Open Space and Playing Fields</b>	<ul style="list-style-type: none"> <li>Several responses relate to specific sites and areas of green space, such as the area surrounding Clifford's Tower.</li> <li>Some of the respondents question as to why developer</li> </ul>

	<p>contribution is required to protect existing pitches from development.</p>
<b>GI6: New Open Space Provision</b>	<ul style="list-style-type: none"> <li>• Some of the respondents feel that clarification of the level of developer contribution is required;</li> <li>• Some of the respondents made objection to the policy in relation to OS10. They believe that the proposal goes against the NPPF, would compromise the SSSI and has no evidence supporting its scale and location;</li> <li>• Some of the respondents have raised issue with the wording and accuracy of the policy. They feel that provision for open space should not be left to the developer alone but in consultation with the local communities.</li> <li>• Some of the respondents made Strategic Site specific responses and feel that there should be clarification of the relationship between OS sites and ST sites and that it would be prudent to insert the current standard for calculating recommended open space in new developments in the supporting text. Some of the respondents outright object to open space provision on ST7, ST8, ST9 and ST35.</li> </ul>
<b>GI7: Burial and Memorial Grounds</b>	<ul style="list-style-type: none"> <li>• One of the respondents supports the expansion of current burial grounds;</li> <li>• One of the respondents feels that an area for potential burial grounds at Osbaldwick has been overlooked and that it should be identified as a Green Burial Ground.</li> </ul>
<b>Section 10: Managing Appropriate Change in the Green Belt</b>	
	<ul style="list-style-type: none"> <li>• General support for Green Belt policies;</li> <li>• Some landowners believe that the Green-belt designation is unduly restrictive;</li> <li>• Policy GB4 needs to reflect NPPF which states that exceptions allow housing to be built on Green belt land if it is <i>entirely</i> affordable housing, not <i>partly</i> affordable housing;</li> <li>• The green belt policies offer little opportunity for rural businesses, which are not allied to agriculture or forestry, to establish or expand.</li> </ul>
<b>Section 11: Climate Change</b>	
	<ul style="list-style-type: none"> <li>• Several developers feel that energy requirements for new housing developments are solely the remit of Building Regulations and CYC should not be imposing more onerous requirements on developments;</li> <li>• There is objection to the Policy being applied to strategic</li> </ul>

	<p>housing on the basis that the Policy lacks clarity as to whether it applies to major residential schemes;</p> <ul style="list-style-type: none"> <li>• Some consider that the requirement to achieve a BREEAM 'excellent' rating is unduly restrictive; requirements should be revised to achieve a 'Very Good' rating instead.</li> </ul>
<b>Section 12: Environmental Quality and Flood Risk</b>	
	<ul style="list-style-type: none"> <li>• General support for Policies ENV1-5;</li> <li>• Some feel that the policies are inadequate with regards to air quality;</li> <li>• Some respondents consider that policies ENV4 and ENV5 fail to tackle, and are in danger of exacerbating, existing drainage and surface water issues;</li> <li>• Further detail and clarification required on the extent of developer contribution.</li> </ul>
<b>Section 13: Waste and Minerals</b>	
	<ul style="list-style-type: none"> <li>• Detailed minerals and waste policies are contained in the Minerals and Waste Joint Plan. Any policies in the York Local Plan must ensure that they are consistent with strategic policies in the MWJP.</li> <li>• A minor factual update is required in paragraph 13.3 which states that AWRP will become commissioned in early 2018. However, the site became fully operational at the end of January 2018 therefore this paragraph requires updating to reflect the current status of the site.</li> </ul>
<b>Section 14: Transport and Communications</b>	
	<ul style="list-style-type: none"> <li>• Whilst all the policy objectives relating to transport, such as contributing to economic vitality, public health protection of the natural environment and improved access for the transport disadvantaged etc, can be found throughout the Plan they are not consistently presented as a justification for the transport policies in the Plan;</li> <li>• The design standards and policy thresholds referred to are not yet specified as they are to be contained in Supplementary Planning Documents which are awaited, so it is not possible to judge the potential effectiveness, and hence soundness, of the Local Plan;</li> <li>• The transport policies contain several qualifications which risk undermining the effectiveness of the plan;</li> <li>• Several policies (e.g. T1 and T8) are supported in principle, but elements within them relating to Site ST5 York Central are considered unsound;</li> </ul>

- Policy T1 fails to meet requirements of Para 17 of NPPF - the needs of disabled and those with mobility issues/impairments are not considered;
- The projected increase in travel time and peak hour congestion is not acceptable;
- No analysis has been undertaken on potential improvements (other than those already included in the plan);
- Some consider that current upgrades to the A1237 outer ring road are inadequate;
- Proposed developments along the A1237 ring road corridor, render the plan unsound as the sustainable transport infrastructure to support these developments would, at a minimum, involve grade separated junctions on the overloaded A1237, and without significant government or regional funding this will never be economically viable;
- An Infrastructure Delivery Plan has been not available to be read alongside the Local Plan and so how can residents and businesses be confident that infrastructure proposals are sufficiently detailed and feasible;
- The transport policies are based throughout on the Local Transport Plan 2011-2031 (LTP3) which is out of date;
- The city's infrastructure will not be able to accommodate any more than 867 new homes each year;
- The list of strategic cycle and pedestrian improvements is incomplete and fails to address key inadequacies in the connectivity and capacity of the current networks;
- The Local Plan is not consistent the National Cycling and Walking Investment Strategy 2017, in that measures outlined within it are not sufficient to meet the overall aim of that Strategy;
- The Transport Topic Paper (and Plan) is informed by an outdated transport model that fails even to mention cycling or cycling infrastructure;
- Policy T8 Demand Management is wholly inadequate, particularly when set against the prediction of a 55% increase in congestion. There is a much wider range of demand management measures available;
- There is insufficient consideration of freight in the Plan;

	<ul style="list-style-type: none"> <li>• Further detail on the extent of developer contributions should be made</li> </ul>
<b>C1: Communications Infrastructure</b>	<ul style="list-style-type: none"> <li>• The policy should require refurbishment and new development schemes to be future proofed to facilitate the provision of mobile, broadband and wireless communications infrastructure, including in the public realm and within private buildings.</li> </ul>
<b>Section 15: Delivery and Monitoring</b>	
<b>DM1: Infrastructure and Developer Contributions</b>	<ul style="list-style-type: none"> <li>• Note the requirement for developers to provide necessary infrastructure to mitigate against local impacts but this isn't set out in the policy, just the justification and it is suggested that these should be incorporated in the actual policy;</li> <li>• The viability work currently being undertaken by CYC needs to be vigorously tested, working with the development industry, including an assessment of the cumulative impact on viability;</li> <li>• Whilst the text to support DM1 makes an attempt to draw the relevant policies referencing developer contributions, it must be acknowledged that they all make demands which would in the main be covered by CIL.</li> </ul>

## 7.0 How Comments have been taken into Account

- 7.1 This section identifies where information can be found on how comments have been taken into account and signposts the relevant documents in relation Regulation 18.
- 7.2 The *City of York Local Plan Sustainability Appraisal Appendix K– Policy and Site Audit Trail (February 2018)* document sets out an audit trail of the development of policy and sites. To ensure the chronology of policy development was captured an 'audit trail' was completed which addressed national policy, local evidence, the SA/SEA, third party representations and the reasons for changes at each stage. This analysis described how policy has evolved from initial conception through to the Consultation (2017). An audit for each policy theme/area rather than for every policy was completed. Please refer to Annex 1 of this report. The strategic sites audit trail provides an understanding of the evolution of Strategic sites that have been identified as reasonable alternatives through the site selection process and considered for potential allocation in the Local Plan, this is also in Annex 1 to this report. All of the sites which passed criteria 1 to 4 were considered reasonable alternatives but some were not chosen as allocations. Between Pre-Publication 2017 and Publication 2018 the list of reasonable alternative sites has been subject to further technical officer analysis which included updates to availability and deliverability, analysis of further evidence in relation to show, stoppers and technical officer comments. Part 3 of Annex K which is Annex 1 to this report summarises this information.

- 7.3 Since the Local Plan Publication Draft was taken to Members in autumn 2014 there have been a number of national and local policy updates. The evidence base that underpins the emerging Local Plan has also progressed. The Local Plan has also evolved in response to consultation responses. It has therefore been important to take these national and local updates including consultation responses into account when developing the local plan policies. On this basis the Council undertook further work to refine the local plan policies. The changes were wide ranging and are provided in Annex 7 of the Council's Executive Report from 13<sup>th</sup> July 2017. It includes a schedule of track changes to show the non employment and housing sites/growth related policies modifications to York's Local Plan since the Preferred Options Local Plan in 2013 this is included as Annex 2 of this report. Annex 2 of this report also includes the officer assessments of housing, employment and other sites since Preferred Sites Consultation (2016) these are highlighted in Annex's 3-5 of the 13<sup>th</sup> July Executive Report. These officer assessments summarise the comments made through the Preferred Sites Consultation (2016) and recommendations to the Executive about how these changes could be taken into account. The minutes of this meeting are also included within Annex 2 of this report.
- 7.4 The changes made between the Pre-Publication (2017) and Publication (February, 2018) Local Plan are set out in part of the Council's Executive Report from 25<sup>th</sup> January 2018, please refer to Annex 3 of this report. A detailed summary of the comments made to the Pre-Publication Consultation and how they were taken into account in the drafting of the Publication Consultation is shown. This was Annex A to the Executive Report 25<sup>th</sup> January 2018. The Annex contains a proforma for each policy in the emerging Local Plan which includes:
- changes to policy post Pre-Publication Consultation with changes shown as 'tracked changes';
  - supporting text changes;
  - summary of reasons for change; and
  - consultation responses summarised as supports, objections and comments.
- 7.5 The proformas are in plan-order and presented in two sections; policies and general site allocations. This includes suggested changes to the sites and alternative site allocations. All strategic sites (ST) are represented in the SS site policies section. A table of sites submitted that were previously rejected or new sites considered are also summarised. Appendix 1 to Annex A of the Executive Report sets out analysis of any re-submitted previous rejected sites and any new sites that have been submitted as part of the consultation which have been identified as having potential for allocation. Additional changes to the Publication Local Plan (February, 2018) were also made following the Executive on 25<sup>th</sup> January 2018. These are also included as Annex 3 to this report. The minutes from the 25<sup>th</sup> January 2018 are also included in Annex 3.

## **Annexes**

**These Annexes are available upon request from the author of this report.**

Annex 1 – City of York Local Plan Sustainability Appraisal Appendix K– Policy and Site Audit Trail (February 2018)

Annex 2 – Council Executive Report (13<sup>th</sup> July 2017) including Annex’s 3-5 and 7 and associated minutes

Annex 3 – Council Executive Report (25<sup>th</sup> January 2018) including Annex A and the associated minutes.

Annex 4 – LDF Issues and Options Consultation Summer 2006 (July 2007)

Annex 5 – Core Strategy Consultation Statement (July 2009)

Annex 6 – Core Strategy Preferred Options Consultation Statement & Schedule of Responses (February 2011)

Annex 7 – Core Strategy Submission (Publication) Consultation Statement Regulation 30 (1) (d) Statement (September 2011/amended 2012)

Annex 8 – Core Strategy Consultation Statement Regulation 30 (1) (e) (January 2012)

Annex 9 – City of York Local Plan Preferred Options – Consultation Audit Trail (May 2013)

Annex 10 – City of York Local Plan Preferred Options Consultation Statement (2018)

Annex 11 – City of York Local Plan Further Sites Consultation Statement (2018) –

Annex 12 – City of York Local Plan Preferred Sites Consultation Statement (September 2017)

Annex 13 - City of York Local Plan Pre-Publication Consultation Statement (February 2018)

### Publication Draft Consultation Annexes

Annex 14 – List of Specific Consultees

Annex 15 – Consultation Letter

Annex 16 – City Wide Leaflet

Annex 17 – Media Releases and examples



Annex 18 – Comments Form

Annex 19 – Poster

Annex 20 – Statement of Representation Procedure

Annex 21 – Index of Respondents

Annex 22 – Summary tables of comments in Plan order