

# YORK

CITY OF YORK  
LOCAL PLAN  
Preferred Sites Consultation Statement  
Draft 2017



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## **Annexes**

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



## 1.0 Introduction

- 1.1 Following approval at Executive on 30<sup>th</sup> June 2016, 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. At this stage of plan preparation there is no regulatory framework to adhere to, however the proposed consultation strategy is in accordance with the Council's adopted Statement of Community Involvement (2007).
- 1.2 The purpose of this report is to summarise this Preferred Sites consultation; it outlines the consultation documents that were produced, sets out who was consulted, outlines the methods and techniques used during the consultation and summarises the main issues raised in the responses received. At the Plan's examination stage we will need to demonstrate that we have considered 'reasonable alternatives'; this process of iterative consultation will be critical in evidencing the Plan's development.
- 1.3 Copies of all responses received can be found on our website. A formal regulation 22(1)(c) statement will be prepared at such time as the local plan is submitted to the Secretary of State for examination. This statement relates only to responses received through the formal consultation period.

## 2.0 Consultation Documents

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

2.2 The following main consultation documents were produced:

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

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

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

- 3.1 To support the production of York's Local Development Framework (now Local Plan), the Council have compiled a database to include statutory/specific consultation bodies and stakeholders, alongside individuals and groups who have registered an interest in the York development plan process, or have expressed an interest in being kept informed of the Plan's progression towards adoption (please see Annex B for further details).
- 3.2 All Members received a briefing note setting out the proposed consultation strategy, and a copy of the main documents was placed in the Member's group rooms at West Offices. Consultation with neighbouring authorities, as part of the duty to cooperate, consisted of a series of 1-1 meetings and utilised existing structures through Local Government North Yorkshire and York and the Leeds City Region. Internal consultation was also undertaken with relevant officers.
- 3.2 Specific Consultees include Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and parish councils. This group of consultees were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. Meetings with these groups were also arranged during the consultation period.
- 3.3 All other consultees on our database (around 10,000), which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York, were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. A copy of the letter sent to consultees can be found at Annex C. In addition, the Council sought to further publicise the Preferred Sites consultation and give details on how and when comments could be made. This is discussed in Section 4 below.

## 4.0 How people were invited to make representations

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

- a press release to advertise consultation and how to respond was issued 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 (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.

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

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

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<sup>1</sup> Statutory consultees are Historic England (HE), Environment Agency (EA), Natural England (NE) and Highways England (HEng).

4.3 A series of targeted meetings and exhibitions were arranged to publicise the consultation and engage with interested parties. Six exhibitions were planned at locations across the city, to coincide with the Zones set out in the PSC document. The exhibitions were staffed by officers and provided the opportunity for members of the public to find out about the consultation. Consultation material and area based maps were also available to view.

- Zone 1: 24<sup>th</sup> August - Tesco (Tadcaster Road), Dringhouses
- Zone 2: 16<sup>th</sup> August - York Sport, Heslington
- Zone 3: 11<sup>th</sup> August - Dunnington Reading Rooms, Dunnington
- Zone 4: 3<sup>rd</sup> August - West Offices, York City Centre/ 9<sup>th</sup> August - Osbaldwick Sports Centre, Osbaldwick
- Zone 5: 18<sup>th</sup> August - Acomb Explore Library, Acomb
- Zone 6: 24<sup>th</sup> August - Oaken Grove Community Centre, Haxby

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

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

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

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

4.6 In addition to the more formal approaches for cooperating with prescribed bodies and other relevant organisations, City of York Council has engaged on an on-going basis through an extensive series of informal (but recorded) meetings with such bodies and organisations, on a largely one-to-one basis, in relation to the Duty to

cooperate. The following meetings took place as part of Preferred Sites consultation.

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

	investment plans.	
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This table excludes regular sub-regional or sub-area meetings, and meetings for specific projects, where formal minutes or notes are otherwise available, as follows:

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

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

## 5.0 Main issues raised

- 1.1 The purpose of this section is to outline the main issues raised by respondents as part of the further sites consultation.
- 1.2 It is important to note that the Preferred Sites consultation document is not a full Local Plan. Consultees were made aware that responses to this consultation should only relate to the sites and / or information set out in the Preferred Sites (2016) Consultation document or associated technical documents, and that further consultation on a Publication Local Plan would take place at a later date. However, acknowledging that respondents commented more widely on Local Plan 'themes', our summary aims to capture responses in the widest sense – Section 6 provides thematic summaries of key issues raised. It should be noted that the views expressed below are of those who submitted representations as part of the consultation and not necessarily the views of City of York Council. For clarity, a single consultee's response may have captured multiple times in reference to a single site (where they have objected to some elements of the site proposal, but support others, for example).
- 5.2 Respondents include residents, interest groups, parish councils, prescribed bodies<sup>2</sup>, developers, agents and land owners.

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

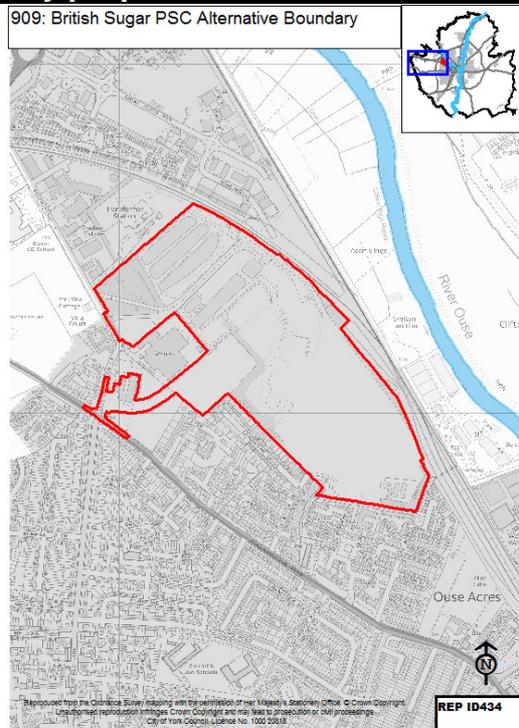
## Potential Strategic Housing/Employment Allocations

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

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

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

**ST1: Alternative boundary proposed**



British Sugar

Representation received includes submitted map above

**ST1: General Area comments for Area 5**

<b>Total representations: 23</b>	<b>Support: 1</b>	<b>Objections: 6</b>	<b>Comments: 10</b>
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**Key Issues Raised**

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

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

	<p>viable.</p> <p>Amongst other respondents, both Nether and Upper Poppleton Parish Council state that the site should not be developed until at least 500 houses have been developed on ST1 and its impact on services is fully analysed.</p> <p>Comments reflect the general concerns of those objecting to the scheme. A number of comments (including from the Parish Council's) ask that further information is made available before development progresses further, including around: the likely housing mix; nature of supporting infrastructure (including school, nursery and healthcare provision); further traffic impact analysis and mitigation measures; archaeological site inspections; impact on nature conservation.</p>
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**ST2: General Area comments for Area 5**

<b>Total representations: 23</b>	<b>Support: 1 relevant</b>	<b>Objections: 5 relevant</b>	<b>Comments: 11 relevant</b>
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**Key Issues Raised**

<b>Support</b>	
<b>Objection</b>	The general public express concerns for the large amount of housing in this area of York. There are also concerns for; increased traffic inadequate drainage and lack of infrastructure and services.
<b>Comment</b>	The general public express comments on the large amount of housing in this area of York. There are also comments on; increased traffic inadequate drainage and lack of infrastructure and services.

**ST4: Land adj Hull Road**

<b>Total representations: 22</b>	<b>Support: 11</b>	<b>Objections: 6</b>	<b>Comments: 5</b>
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**Key Issues Raised**

<b>Support</b>	<p>Amongst others, Heslington Parish Council, Heslington Village Trust, Melrose Industries Plc and Persimmon Homes support the principle of housing development on the site.</p> <p>Both Heslington Parish Council and Heslington Village Trust alongside other respondents support family housing and affordable housing on site but state that student housing should be specifically excluded.</p> <p>Melrose Industries Plc confirm that the landowner is supportive of the allocation., its access proposals and suggested development density.</p> <p>Persimmon Homes confirms that there are two full planning applications for development of the site. Persimmon Homes has an option agreement with the owner and it is their intention to commence development as soon as possible.</p>
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<b>Objection</b>	<p>Cllr Waters objects to development on the following grounds: site should remain as part of green corridor into the city; development will compromise Jubilee Wood and boundary hedgerows; traffic on Hull Road makes residential use untenable (see Inspector's comments re Sainsbury's/B+Q); drainage concerns; lack of local school space.</p> <p>York Ornithological club states that, in the absence of suitable mitigation measures, they oppose the development of the site. "We believe that a development of over two hundred houses should include appropriate recreational open space on site and that footpaths, hedgerows etc should be routed to guide residents and their pets away from the wildlife sensitive areas of the Heslington East campus."</p>		
<b>Comment</b>	<p>Historic England raise no objection to the site's allocation, but comment on its proposed use, stating that it would be better considered in the context of the future needs of the University, enabling a positive reduction in the scale of ST27.</p> <p>Other comments reflect concerns raised above, namely in relation to increased student housing, lack of infrastructure (medical facilities and educational facilities etc), loss of green field land, transport issues with increased traffic and the impact on drainage.</p>		
<b>ST4: General Area comments for Area 4</b>			
<b>Total representations: 9</b>	<b>Support: 1 relevant to ST4</b>	<b>Objections: 1 relevant to ST4</b>	<b>Comments: 3 relevant to ST4</b>
<b>Key Issues Raised</b>			
<b>Support</b>	General support for Area 4's proposals.		
<b>Objection</b>	Concern that the impact of development proposed has not been tested yet.		
<b>Comment</b>	Issues raised include the impact of development on character and setting of the City and imbalance in the area's housing stock (studentification).		

<b>ST5: York Central</b>			
<b>Total representations: 103</b>	<b>Support: 16</b>	<b>Objections: 38</b>	<b>Comments: 52</b>
<b>Key Issues Raised</b>			
<b>Support</b>	<p>A number of comments support the principle of delivering development on this large brownfield site, including from York Central Partners, York and North Yorkshire Chamber of Commerce, Historic England, the York, North Yorkshire and East Riding LEP, Make-it York, Holgate Liberal Democrats and Barratt and David Wilson Homes.</p> <p>Comments raised in support include that the site will enable the creation of a new Central Business District to replace Grade A office losses; that critical infrastructure must be developed alongside (and details made available for consultation); and to the principle of phasing brownfield sites ahead of Greenfield. York Central Partners request that the city centre boundary is widened to include York Central.</p> <p>Some of those writing in support of the scheme query whether the</p>		

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

	<p>whether and when the site will be available for development – in view of the site’s strategic importance to the Local Plan, if these fundamental questions cannot be answered there is a real threat that the Plan will fail the soundness test. (York and North Yorkshire Chamber of Commerce/Redrow Homes/Yorvik Homes). Specific issues include: lack of clarity on amount of available commercial/residential land - should additional land be provided elsewhere as a 'Plan B'?; what sort of mix/type of mix/type of housing is proposed, and will it meet York's needs, including an element of affordable; what supporting development is proposed (shops, green space, doctors etc).; impact of ‘high rise’ on historic character and setting of the city.</p> <p>York Green Party supports the requirement for supporting social infrastructure, and the principle of producing SPD to guide development, but believes ambitions for the scheme should be higher. York Central needs to be a zero carbon development, requiring excellent standards of sustainable building and design throughout, as well as very low car use – a model of sustainable design for the 21<sup>st</sup> Century.</p> <p>Amongst many others, Friends of Holgate Community Garden raise concerns that the prospective route for access to the York Central site crosses the community garden, citing the loss of productive and creative gardening and loss of amenity space. They note further significant impacts including from additional traffic/pollution on local resident’s health and quality of life.</p> <p>Similar general issues raised regarding the lack of information presented to help people understand the scheme, specifically around transport access and sustainable transport options, housing mix and type, supporting services and amenities (including support to retain the Railway Institute as a community asset)and how development could create a new place within an existing community.</p> <p>Oakgate and Caddick Group comment on the overreliance on York Central for the city’s future provision of land for B1a and that, due to deliverability challenges (access issues/compulsory purchase orders/lack of developer involvement) it could take at least 10 years before any office development is delivered.</p>
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**ST5: General Area comments for Area 4**

<b>Total representations: 9</b>	<b>Support: 1 relevant</b>	<b>Objections: 1 relevant</b>	<b>Comments: 2 relevant</b>
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**Key Issues Raised**

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

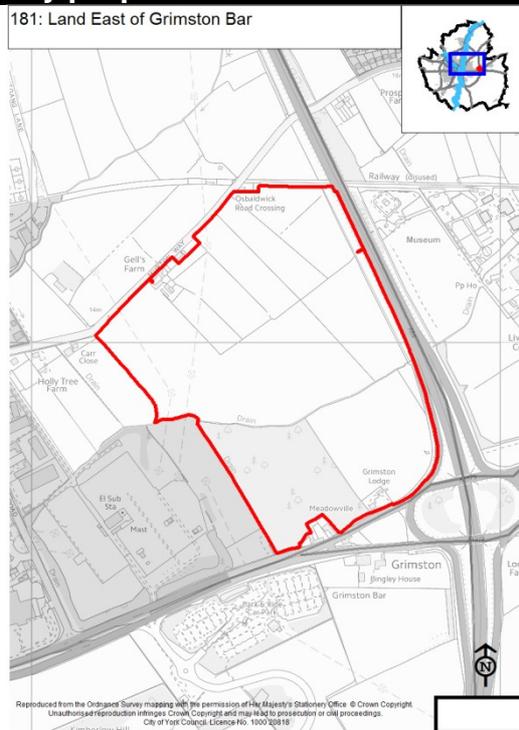
**ST6: Land north of Grimston Bar**

**Total representations: 17    Support: 3    Objections: 9    Comments: 6**

**Key Issues Raised**

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

**ST6: Alternative boundary proposed**



Grimston Bar Development Group, Taylor Wimpey and Linden Homes

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

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

**ST6: General Area comments for Area 4**

<b>Total representations: 9</b>	<b>Support: 2</b> relevant	<b>Objections: 1</b> relevant	<b>Comments: 2</b> relevant
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**Key Issues Raised**

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

**ST7: Land east of Metcalfe Lane**

<b>Total representations: 37</b>	<b>Support: 11</b>	<b>Objections: 19</b>	<b>Comments: 12</b>
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**Key Issues Raised**

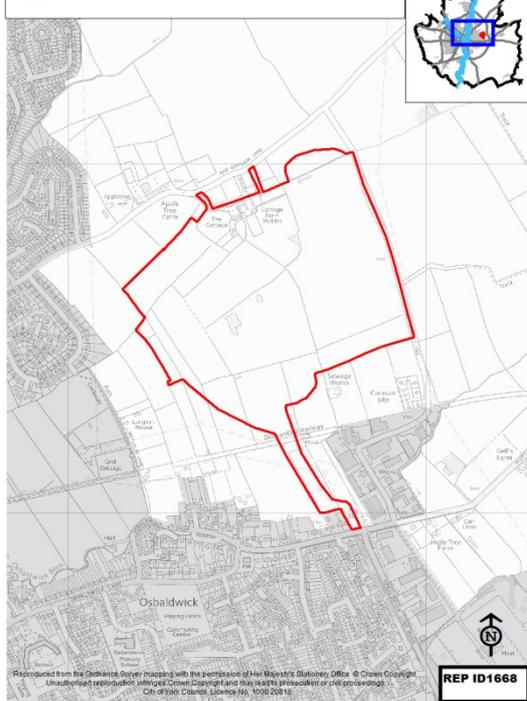
<b>Support</b>	<p><u>General support for the principle of development/Garden Villages</u></p> <p>A supportive response was received for the principle of development on this site, including from Persimmon Homes, Taylor Wimpey, Barratt and David Wilson Homes, TW Fields, and AAH Planning (obo a landowner). Note that each developer has submitted alternative boundaries to those proposed in the Preferred Sites plan – see below.</p> <p>Key issues raised include:</p> <ul style="list-style-type: none"> <li>• Support the principle of developing brownfield land;</li> <li>• Support the opportunities offered by developing a holistically planned settlement</li> <li>• Scale of development is more appropriate and would not be as impactful on established communities as previous iteration.</li> </ul>
<b>Objection</b>	<p>Persimmon Homes, Taylor Wimpey, Barratt and David Wilson Homes, TW Fields, and AAH Planning (obo a landowner) object to the site's proposed boundary on a number of grounds, including:</p> <ul style="list-style-type: none"> <li>• Site is undeliverable under current proposals – scale is too small to viably accommodate garden village scheme incorporating substantial community infrastructure;</li> </ul>

	<ul style="list-style-type: none"> <li>Artificial buffers, such as the green wedge, would make access to facilities more difficult and is contrary to established best practice. Site is now remote from the main urban area;</li> </ul> <p>Further objections disagree with the Council's conclusion that the site is suitable and deliverable for the scale of housing proposed – there is a risk that if this site is not delivered the Council will be unable to demonstrate a sufficient supply of deliverable housing land.</p> <p>Historic England notes some potential for development to the east of York and that the extent of this site is a big improvement on last draft. However they identify potential harm to the special character and setting of the historic city by removing the gap between the ring road and the edge of York, changing the relationship between York and its villages. Suggested amendment could mitigate against this, notably by moving the eastern edge away from ring road/limiting scale of development.</p> <p>Amongst others, Cllr Warters (Osbaldwick and Derwent Independent) points to the site's green belt status, and the need to protect open land from further encroachment. Further issues raised include that traffic on Hull Road makes residential development untenable; the site has drainage limitations; lack of local school space/other amenities; lack of natural/semi-natural open space. Transport and access issues are a common concern.</p>
<p><b>Comment</b></p>	<p>Heworth Without Parish Council welcomes the reduction in size of the proposed development, but suggests that it should be one of the last sites to be developed within the Plan period primarily due to the current infrastructure issues there are at present, most importantly access and the increase in traffic levels that such a development would have on Stockton Lane and Murton Way / Outgang Lane. They note the cumulative impact of traffic from other sites as a further concern.</p> <p>Cllr Ayre (Heworth Without Lib Dems) supports the reduction in size of this allocation and scale of development proposed and that the proposal would create a separate 'garden village', distinct from the existing urban area. Changes will help to protect key views to the Minster (fundamental to the setting of York) and support the proposal to protect the Millennium Way footpath linking York's historic strays with a 50m green buffer. Pleased that Heworth Without will be protected by a green wedge from Stockton Lane to Bad Bargain Lane to safeguard the character of the area. However, he comments that local residents continue to have significant concerns about the proposed development and opposed to the level of housing planned. Key challenges will be to ensure appropriate access routes are in place and local congestion is not made worse. Also a further challenge will be to ensure an appropriate level of services are provided with sufficient education and community provision.</p> <p>Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a spoke facility (specification given)</p>

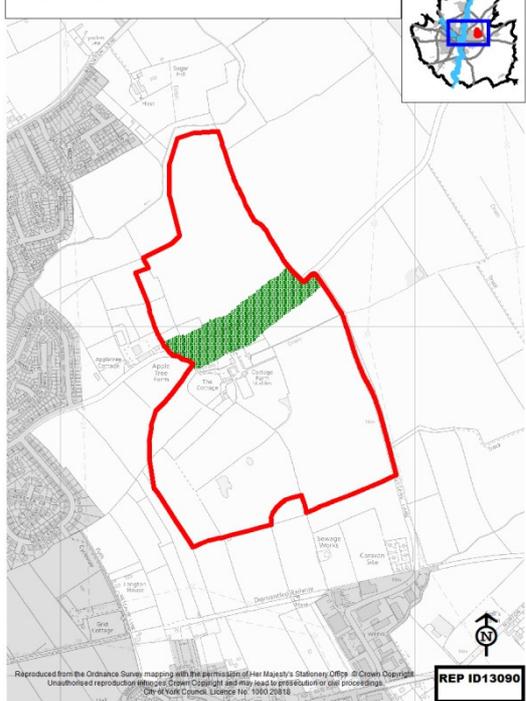
General comments raise concern about the impact on local services/amenities supporting new development (incl natural habitats); impact of further traffic on existing congestion; lack of local employment, and; impact of development on open countryside/green belt and coalescence with Osbaldwick village.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

**ST7: Alternative boundary proposed**

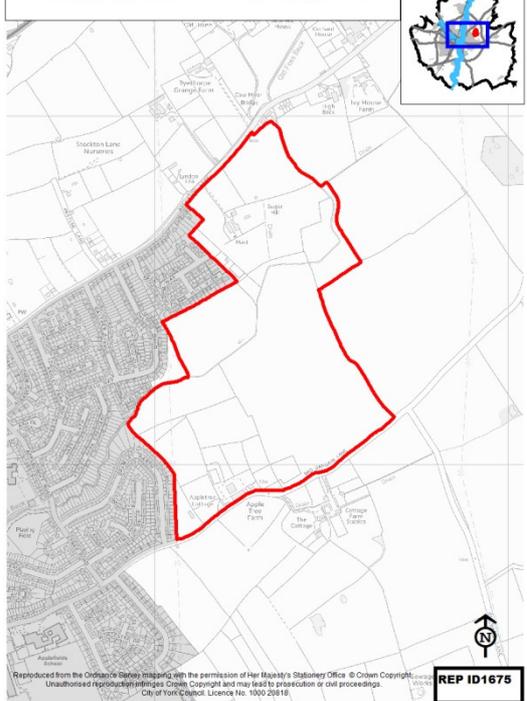
876: ST7 South



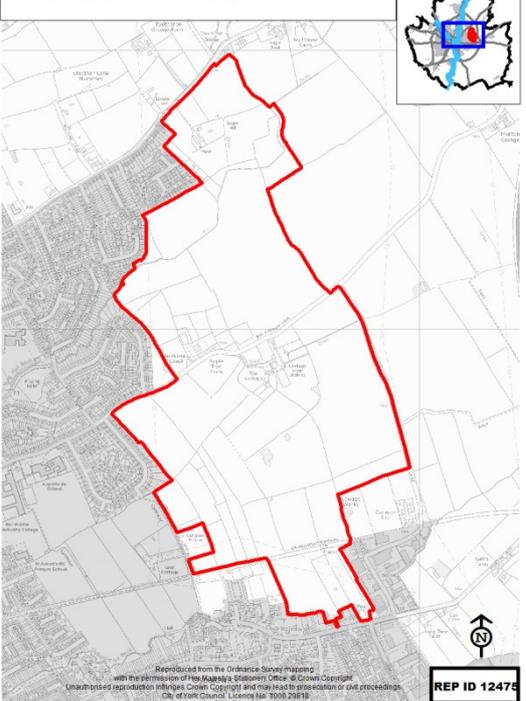
911: ST7 Alternative



912: ST7 Alt Stockton Lane to Bad Bargain Lane



933: ST7 Alternative Boundary



Barratt & David Wilson Homes

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

TW Fields

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

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

#### Taylor Wimpey

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

#### Persimmon Homes

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

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

AAH Planning obo landowner

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

**ST7: General Area comments for Area 4**

<b>Total representations: 9</b>	<b>Support: 2 relevant</b>	<b>Objections: 1 relevant</b>	<b>Comments: 2 relevant</b>
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**Key Issues Raised**

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

**ST8: Land north of Monks Cross**

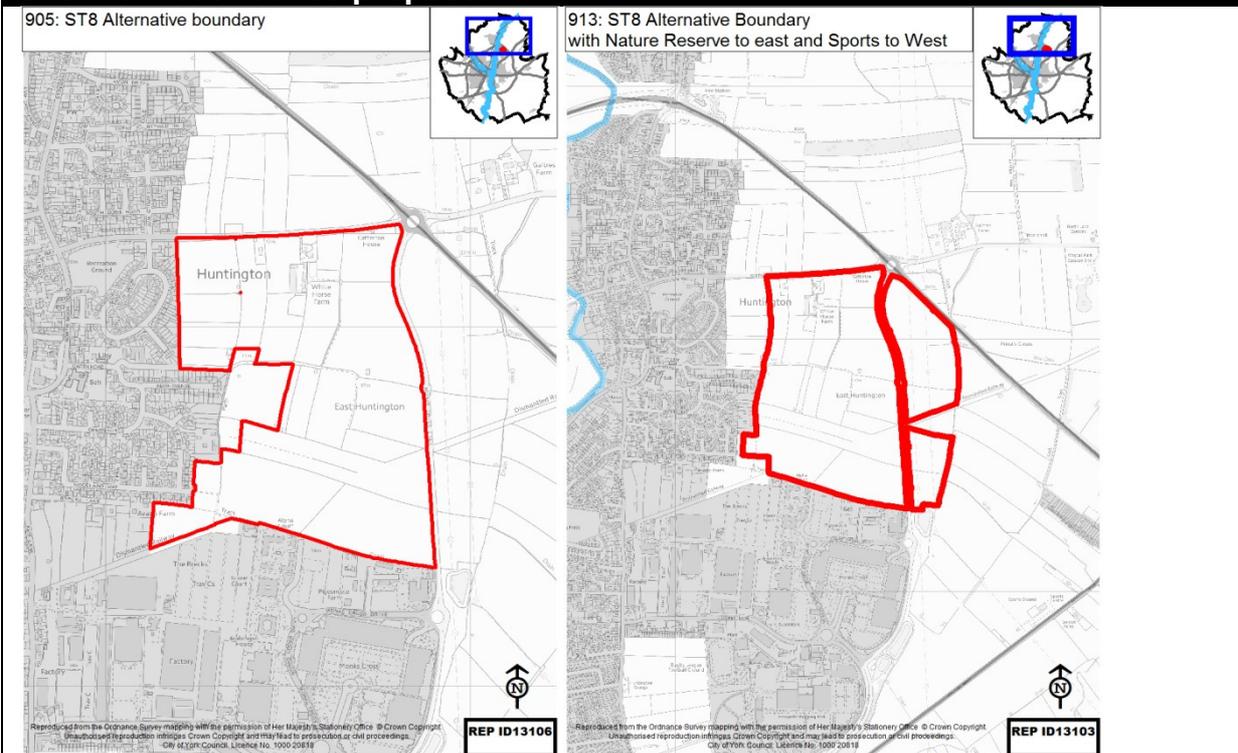
<b>Total representations: 53</b>	<b>Support: 11</b>	<b>Objections: 33 (including objection to boundary proposed)</b>	<b>Comments: 15</b>
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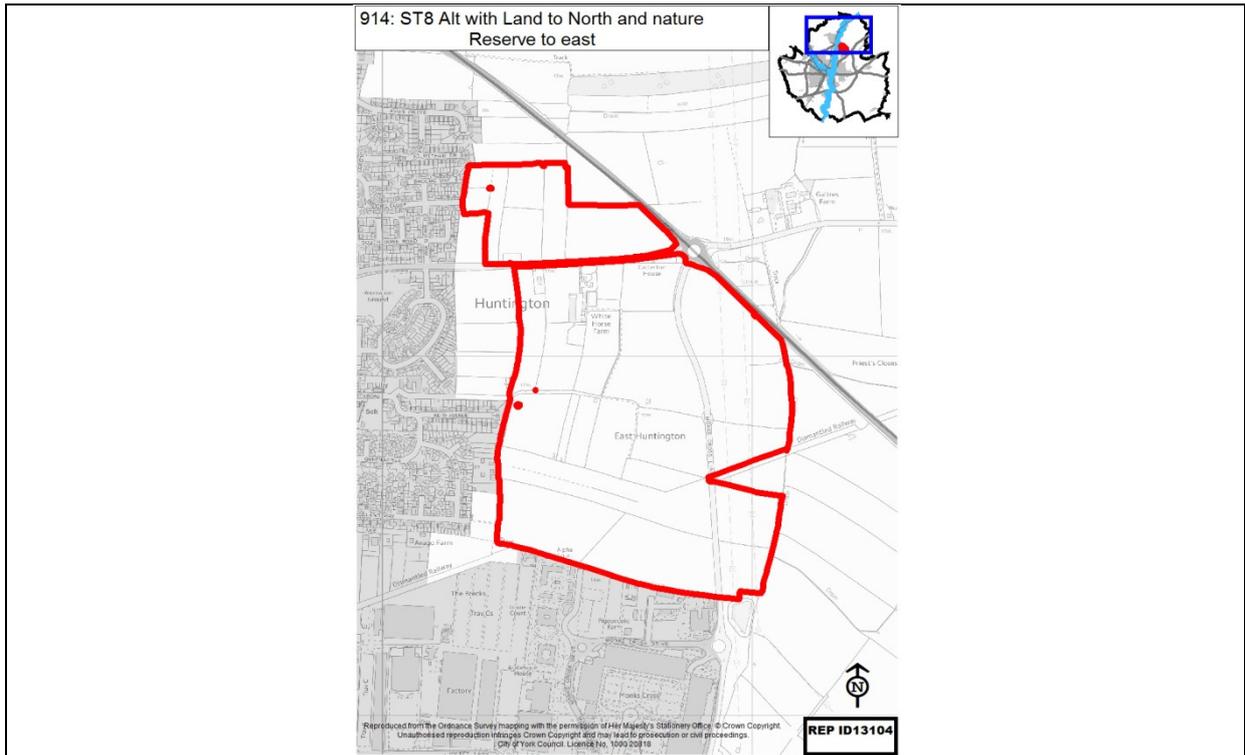
**Key Issues Raised**

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

**ST8: New boundaries proposed**





Johnson Mowatt [REDACTED]

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

Redrow Homes and Linden Homes

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

General issues raised in relation to Area 6/North of Outer Ring Road			
<b>Total representations:</b>	<b>71</b>	<b>Support:</b>	<b>n/a</b>
		<b>Objections:</b>	<b>n/a</b>
		<b>Comments:</b>	<b>2</b>
Key Issues Raised			
<b>Support</b>	n/a		
<b>Objection</b>	n/a		
<b>Comment</b>	Comments in general can be attributed specifically to the ST8 site, but a couple of general comments are relevant. While Huntington and New		

	<p>Earswick Liberal Democrat Councillors appreciate that CYC Officers are required to devise a Local Plan that meets with legislation, they note the unsustainable pressure placed on this part of the City by recent levels of development (Vangarde, Huntington Stadium and two housing developments). Recent floods have highlighted the drainage problems in this area with water levels never being higher in living memory. The Environment Agency has said attention will have to be paid to the whole of the Foss Basin not just adequacy of the Barrier. All recent developments have added water to the river system and take away land that acts as water storage. It is not equitable to Huntington residents who have suffered considerable development or sensible in terms of future flooding risk that there be further major house building or other development in Huntington and New Earswick area.</p>
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<b>ST9: Land North of Haxby</b>			
<b>Total representations: 536</b>	<b>Support: 17</b>	<b>Objections: 454</b>	<b>Comments: 69</b>
<b>Key Issues Raised</b>			
<b>Support</b>	<p>A small supportive response was received for development on the site, including from the Diocese of West Yorkshire and the Dales and Linden Homes and Barratt and David Wilson Homes, who confirm that the estimated development capacity can be delivered in the Plan period.</p> <p>Strensall and Towthorpe Parish Council recognise that the package of sites identified in Area 6 represent the views of the residents of the Parish.</p> <p>Where support was recorded, in general there is reference made to the potential for development to benefit the town, whether through providing affordable housing, additional amenities or improving supporting infrastructure (road and rail).</p>		
<b>Objection</b>	<p>Significant level of objection received in response to proposed development at ST9 (including from (Haxby Town Council, Skelton P.C, Haxby and Wigginton Neighbourhood Planning Group, (Cllr Cuthbertson/Haxby and Wigginton Liberal Democrats).) . Key issues raised include:</p> <p><u>Transport and road safety:</u></p> <ul style="list-style-type: none"> <li>• Site has no access to York/Leeds except by road through Haxby and Wigginton. Development would exacerbate local congestion, which is already significant. Particular concerns around impact on Moor Lane and Usher Lane, which are seen as incapable of absorbing additional traffic. “Additional housing will increase significantly the volume of traffic on Usher Lane. Road is narrow and becomes congested towards junction with Station Road and safe speed limits are exceeded. Road calming measures must be imposed and improvements to junction of Station Road/Usher Lane for safety of pedestrians who frequently cross here to access school and shops”.</li> <li>• Issues with northern ring road (A1237/A64) and Haxby/Strensall</li> </ul>		

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

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

Inappropriate/inadequate access to the site

Green Belt:

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

Drainage and sewerage:

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

Local facilities and amenities

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

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

Overdevelopment in Haxby – impact on the character of the place and community spirit

- Haxby and Wigginton have been subject to massive incremental

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

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

#### Impact on environment

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

#### Conflict with SA objectives

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

Typical representative objections:

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

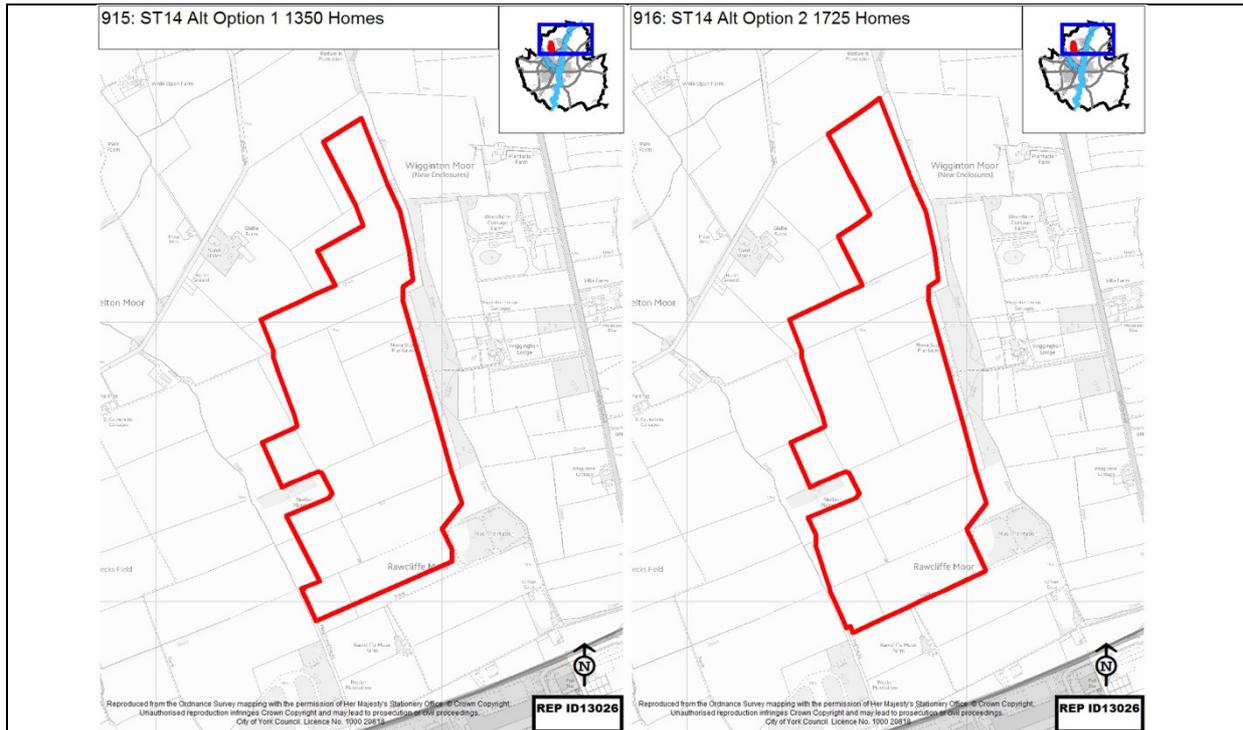
	<p>“This would be an unacceptable impact on Haxby. Access onto Usher lane/Station Road junction would impact on existing capacity and highlight safety issues. Development would destroy valuable Grade 3a agricultural land and key views. This intrusion into open countryside would represent urban sprawl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

	include proposed extension.
<b>General issues raised in relation to Area 6/North of Outer Ring Road</b>	
<b>Total representations: 71</b>	<b>Support: 2 relevant to Haxby area</b>
<b>Objections: 36</b>	<b>Comments: 27</b>
<b>Key Issues Raised</b>	
<b>Support</b>	General support for reduced housing numbers in Haxby area.
<b>Objection</b>	Those commenting on the principle of development north of the ring road/Haxby/Wigginton typically mirror the concerns attributed to ST9 itself, namely the likely increase to existing local traffic congestion, air and noise pollution, lack of local amenities, drainage/sewerage under capacity, lack of employment in York for new residents, and congestion on A64 and A1237. A common statement is that the area is already overdeveloped and no new homes should be built in the area until the outer ring road is dualled and an additional access road built (Haxby and Wigginton Neighbourhood Plan Steering Group).
<b>Comment</b>	Those commenting on the principle of development north of the ring road/Haxby/Wigginton typically mirror the comments attributed to ST9 itself. General support for the principle of housing development but concern that the likely impacts on local infrastructure, amenities and services should be mitigated against (Haxby Town Council/Wigginton Parish Council, Julian Sturdy MP, Cllr Cuthbertson as ward councillor, Haxby and Wigginton Liberal Democrats). Skelton Village Trust note that major sections of the ORR cannot cope with existing traffic flows. Problems include access restrictions experienced by emergency services. Providing adequate road capacity for forecast future demand is essential to allow for future housing growth.

<b>ST14: Land west of Wigginton Road</b>			
<b>Total representations: 113</b>	<b>Support: 20</b>	<b>Objections: 72</b>	<b>Comments: 27</b>
<b>Key Issues Raised</b>			
<b>Support</b>	<p>Amongst a number of other respondents, Strensall with Towthorpe Parish Council, Clifton Without Parish Council, Haxby and Wigginton Neighbourhood Plan Steering Group give conditional support to the principle of development in this location, stating the following conditions:</p> <ul style="list-style-type: none"> <li>• Dualling of the A1237 should precede any development (Clifton Without PC);</li> <li>• Development should precede H54 and ST9, given the infrastructure involved (H+W NPSG);</li> <li>• Site should be expanded to incorporate more housing/conversely that smaller site size is more realistic;</li> <li>• As a stand alone village in its own right it should provide for its own services and facilities and appropriate infrastructure;</li> </ul> <p>Historic England recommends that there is considerable merit in continuing to explore the potential offered by this new settlement - the</p>		

	<p>degree of harm caused to York's special character and setting could be much less than that caused were a similar scale of development located on the edge of the built up area of York, or within existing surrounding villages. Note objection below.</p> <p>Barratt Homes, David Wilson Homes and TW Fields fully support the principle of the proposed allocation, and of delivering a Garden Village design philosophy with the provision of substantial community infrastructure including a primary school, village centre and open space (incl recreational facilities). Site is suitable and in a highly sustainable, unconstrained location. The site is available now and is in the control of a national housebuilder and regional development company who are actively seeking to secure planning permission. The site can be considered achievable as homes can be delivered on the site during the next 5 years, and indeed within the first 5 years of the Plan. Note suggested boundary changes as per the below.</p>
<b>Objection</b>	<p>Significant level of objection received in response to proposed development at ST14, including from Haxby Town Council, Rawcliffe Parish Council, Skelton Parish Council, Historic England, York Green Party, CPRE, Julian Sturdy MP, Skelton Village Trust, Airedon Planning and Design and JJ Gallagher Ltd. Key issues raised include:</p> <ul style="list-style-type: none"> <li>• Impact of the scale of development proposed on the green belt/landscape/ and agricultural land. Historic England states that an incursion of this size in the open countryside around the historic city is likely to harm the special character and setting of York. At this stage it has not yet been made clear what impact the infrastructure necessary to facilitate this development may have on the elements which contribute to the special character and setting of the City - without this, this allocation has the potential to result in serious harm;</li> <li>• Site's capacity is not of sufficient scale to provide a range of facilities and services required for a stand-alone settlement;</li> <li>• Highways (and associated air quality) impacts will be significant, particularly onto the already congested ring road. Rural roads are already affected - Skelton and settlements to the east already experience traffic seeking to avoid congested ring road in places these roads are too narrow to cope. Developments will exacerbate this problem. Note the cumulative impact of other development;</li> <li>• Extensive infrastructure requirements are unlikely to be deliverable in the suggested timescale;</li> <li>• Potential drainage/flooding problems.</li> </ul> <p>JJ Gallagher Ltd considers that development could set an unwelcome precedent and result in unrestricted sprawl into the Green Belt, noting that the site's development conflicts with three of five key purposes of green Belt. Disagree with the Council's conclusion that the site is suitable and deliverable for the scale of housing proposed in York. The approach that the Council has adopted of seeking to preserve the</p>

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



**Barratt Homes, David Wilson Homes and TW Fields**

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

**Barratt Homes, David Wilson Homes and TW Fields**

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

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

<b>ST15: Land west of Elvington Lane</b>			
<b>Total representatives commenting on ST15: 167</b>	<b>Support: 33</b>	<b>Objections: 103</b> (includes 2no. duplicate objections which refer to the SA as well as Preferred Sites doc)	<b>Comments: 42</b>
<b>Key Issues Raised</b>			
<b>Support</b>	<p><u>General support for the principle of development/Garden Villages</u></p> <p>A supportive response was received for the principle of development on this site, including from Historic England, CPRE, Julian Sturdy MP, Barratt and David Wilson Homes, University of York, ██████████, York Action Group Alliance, Sandby (York) Ltd and Oakgate/ Caddick Group. Key issues raised include:</p> <ul style="list-style-type: none"> <li>• Support the principle of developing brownfield land;</li> <li>• Support the opportunities offered by developing a holistically planned settlement</li> <li>• A strategy in which part of York's development needs are met in new freestanding settlements beyond the ring road might help to</li> </ul>		

	<p>safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built-up area of York to its surrounding settlements. (Historic England)</p> <p><u>Enhancing the natural environment</u></p> <p><u>Potential transport/highway improvements</u></p> <ul style="list-style-type: none"> <li>The University of York appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST15 - greatly advantageous to business users and relieving congestion on the Grimston Bar junction. Discussions have been held between the developers of ST15 to explore the opportunities of linking the University campus with this development, creating a sustainable community and an ideal location for staff to live with easy non-car access (O'Neill Associates obo University of York). Note queries re cost of delivering access</li> </ul> <p>A number of members of the public support the allocation, on the grounds that it will help meet the development needs of the City, reduce development pressures on other parts of the City, provide a 'garden suburb new village' south of York, support the change to move the site away from the A64, by adding a new junction onto the A64 it would reduce congestion at Grimston Bar, avoid floodplain areas, reduce the size of the site, less obtrusive location, could absorb the housing numbers proposed in site ST33, but also note that the infrastructure requirements, services (eg. Roads, sewers etc) and facilities and the impact on Heslington Tillmire (inc buffer) would need careful consideration.</p>
<p><b>Objection</b></p>	<p>Significant level of objection received in response to proposed development at ST15, including from Yorkshire Wildlife Trust, Heslington Village Trust, Heslington Parish Council, Elvington Parish Council, Fulford Parish Council, Cllr Warters, Historic England (in relation to absence of information confirming development would safeguard those elements which make York such a special place), Shepherd Group Properties Ltd, Shepherd Homes, RSPB, Taylor Wimpey, York Ornithological Club, Miller Homes, Linden Homes, Persimmon Homes and Taylor Wimpey, JJ Gallagher Ltd, Joseph Rowntree Housing Trust, Johnson Mowat, Avant Homes, KCS Developments, Redrow Homes and Linden Homes, [REDACTED]. Key issues raised include:</p> <p><u>Development in green belt/open countryside</u></p> <ul style="list-style-type: none"> <li>The development of this strategic site conflicts with three of the five key purposes of Green Belt, namely to: check the unrestricted sprawl of large built-up areas; assist in safeguarding the</li> </ul>

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

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

Impact on the natural environment

- The previous HEA appears to be excluded from the allocation, with no alternative marked. No information is provided to indicate that any work has been undertaken on the recreation strategy. Further, the inclusion of a large part of Elvington Airfield, including parts of the SINIC, without assessment of either direct or indirect impacts of the housing allocation, is concerning, particularly in light of the Council's own previously negative assessment of allocation here. If ST15 is allocated in advance of the HEA, the recreation strategy and all other mitigation measures being secured through policy there is a high risk of the allocation being found unsound (RSPB).
- Objecting to ST15 Land to the West of Elvington Lane due to, proximity to the impact zone for Lower Derwent Valley Special Protection Area (Flooding and Birds), closeness to the SSSI the Heslington Tillmire, lack of a habitat enhancement area, fragmentation of the Ouse and Lower Derwent Valley and loss of habitats (birds), being within a site of importance for nature conservation, disruption to bird breeding, proximity to A64 deterrent to cyclists, complexity of long term management with multiple landowners, habitat enhancement areas will be difficult to ensure and lack of a master plan. The original habitat enhancement area should remain with buffer areas, a long term management plan is needed, researched access, a recreation plan and a master plan. (Yorkshire Wildlife Trust)
- Object to the site because to now include a significant part of the Elvington Airfield site (Site 607) having previously rejected it because of the ecological impact is illogical and inconsistent. No change in circumstances is listed which would explain this choice of a previously rejected site. The site does not avoid impacts on Heslington Tillmire, which is a Site of Special Scientific Interest - the highest national level of environmental protection. The Tillmire is 6km from the River Derwent and the YWT reserve of Wheldrake Ings. It is very likely that birds, particularly waders, will move frequently between the area of the Tillmire where they breed and the Lower Derwent Valley (LDV) for feeding. Much of the LDV is under EU legislation designated a Special Protection Area (SPA) which provides a higher level of protection not only on the SPA but on adjacent areas like the Tillmire. If ST15 remains in the Local Plan any development must be consistent with the following principles: 1. A full objective assessment of the Tillmire for devising measures which will protect and isolate it from any damaging impact from development. Such measures must be

implemented before any further development takes place and be fully funded by landowners/developers; 2. a buffer zone in excess of £500m needs to be established to minimise any form of disturbance or impact on the two SSSIs; 3. the lack of inclusion of a Habitat Enhancement Area (HEA) in the allocation is a retrograde step from the 2014 Local Plan which provided greater certainty that a buffer zone and HEA would be provided; 4. funding needs to be provided by landowners/developers in perpetuity to ensure the ongoing proper management of buffer zones (York Ornithological Club).

#### Traffic and Access

- Whilst the Trust supports some of the changes made by CYC since last consultation, there are still concerns over traffic and access through Heslington, site location and Tilmire SSSI, historic views, viability of development which may lead to expansion of site or increase in density (Heslington Village Trust).
- The need for new access to the A64 could render the scheme unviable.
- Site is remote from public transport access
- Note the wider impact of traffic generated/displaced by this development.
- Concern around use of Elvington Lane for any form of access to the site.

#### Lack of important detail – note also comments under ‘Impact on the natural environment’ above

- Concern about lack of detail on impact to local area on infrastructure, especially transport links to A64 and B1228. The effects on local countryside could be vast.
- Historic setting - The approach that the Council has adopted of seeking to preserve the setting and character of York lacks transparency and is at the expense of the other purposes of Green Belt. There is a risk that if this site is not delivered the Council will be unable to demonstrate a sufficient supply of deliverable housing land. The evidential basis to justify the selection of the site through the emerging Local Plan has not been provided by the Council
- Welcome reduction in size and the fact that it is now partly brownfield. However, consider that for development of this scale, there are too many unknown issues including lack of information on biodiversity mitigation, traffic infrastructure and landscape strategy (Heslington PC).
- Allocation has improved since last LP draft - it is reduced in size and located further from A64. A stand alone settlement is likely to cause less harm on the setting on York than an extension on the urban edge. However, it is by no means clear what impact the infrastructure necessary to deliver this new settlement will have upon York’s special character and setting. As we made clear in

our response to the last consultation, this aspect is of paramount importance. The Plan will need to demonstrate that this area can deliver the scale of growth anticipated in a manner commensurate with safeguarding those elements which make York such a special place. In the absence of this information, this allocation has potential to result in serious harm to SA Objective 14. (Historic England).

- Site has not yet been subject to full Sustainability Appraisal.

#### Delivery issues/other infrastructure

- No certainty over delivery rates due to complexities of site including land ownership, viability and developer interest.
- Not of sufficient size to deliver required social and physical infrastructure.
- Site could only provide new homes at end of plan period due to long lead-in times.
- Site scores negatively in interim SA.
- Doubts about site's viability and deliverability, particularly because of infrastructure requirements – “Best case scenario is that an application will be prepared and submitted on receipt of the Inspectors Report and applied a 5 year lead in period to allow for the promoters to identify a developer, the determination of the planning application, S106, reserved matters approval contractual negotiations and significant infrastructure delivery. ST34 is unlikely to deliver more than 835 dwellings in the plan period a shortfall of 775 when compared to that predicted in the Local Plan” (Linden Homes).

#### Availability of alternatives

- Smaller more sustainable sites are situated on the edge of the existing settlement that could deliver housing promptly and sustainably and thereby boost housing supply in accordance with national policy.
- A wide range of sites should be considered rather than CYC putting all of its eggs in one basket.

Elvington Parish Council comment that splitting the airfield runway would be absurd on historical reasons, strategic need, recreational use and tourism which is an economic strategic priority for York. If built ST15 should be further north and west. The A64 separates the site from Heslington and as proposed is too close to Elvington and Wheldrake and would dominate the area. Underground fuel pipelines at the airfield could lead to a contamination issue (Elvington PC)

	<p>A number of members of the public object to the allocation on the grounds that it is totally unsuitable for housing, is in an unsustainable location, too large (smaller size than original but more houses indicates potential house cramming), too much reliance on the site providing housing for the City, no need for a garden village, overall the development is not necessary, loss of Green Belt, impact on historic character of York / rural character, loss of agricultural land, development is disproportionate to surrounding area / village. ST15 and expansion of industrial estates near the airfield would result in urban sprawl, needs relocating closer to the A64 so it doesn't impinge on the Airfield and Elvington &amp; Wheldrake, traffic congestion, loss of wildlife / impact on SSSI Tilmire, impact on Wheldrake Woods, impact on surrounding villages, unsustainable location, loss of runway / airfield (strategic asset), impact on tourism, impact on Air Museum and users of airfield, lack of infrastructure, damage to cultural heritage, much of the site is in Flood Zone 2, over development, lack of employment facilities, pollution, loss of footpaths / cycle tracks, drainage problems, question how the site will be serviced, contamination from airfield use (under ground fuel pipes), concern over possible pedestrian / cycle access along Long Lane / Common Lane, traffic access via Heslington must be avoided at all costs, no large developments should take place outside the Ring Road, lack of schools, doctors surgeries etc, development will be the size of Pocklington and will need comparable infrastructure.</p>
<p><b>Comment</b></p>	<ul style="list-style-type: none"> <li>• The Environment Agency notes the change in site boundary, and that the site is now located primarily in Flood Zone 1. They advise that a sequential approach to the layout of the site should be taken with all development in Flood Zone 1, with Flood Zones 2 &amp; 3 being left as green open space</li> <li>• East Riding of York Council query whether the scale and type of development proposed on ST15 and ST27 (within the plan period) would be able to support the construction of a new junction on the A64.</li> <li>• Natural England confirms that previous concerns regarding the proximity of the site to the Tilmire SSSI have been partly satisfied as the site has been moved away from the SSSI and proposed housing numbers reduced. Still concerns re potential impacts from visitors to SSSI and consider that mitigation tailored to specific site should be required. Site now closer to Elvington Airfield SINC which will require mitigation. Also consider impact on bird species on candidate SINC and mitigate. We would need to see more details of the mitigation scheme before we could fully assess the impacts of such an allocation. Given the sensitivity of the location, we advise that the council considers including detailed masterplanning of the proposal including mitigation measures and bespoke policy in order to ensure delivery of measures. In addition we would like to see a requirement for mitigation measures to be delivered prior to the commencement of development. Given the need for a Sustainability Appraisal and assessment of alternatives we would re-iterate our earlier advice that alternative locations in</li> </ul>

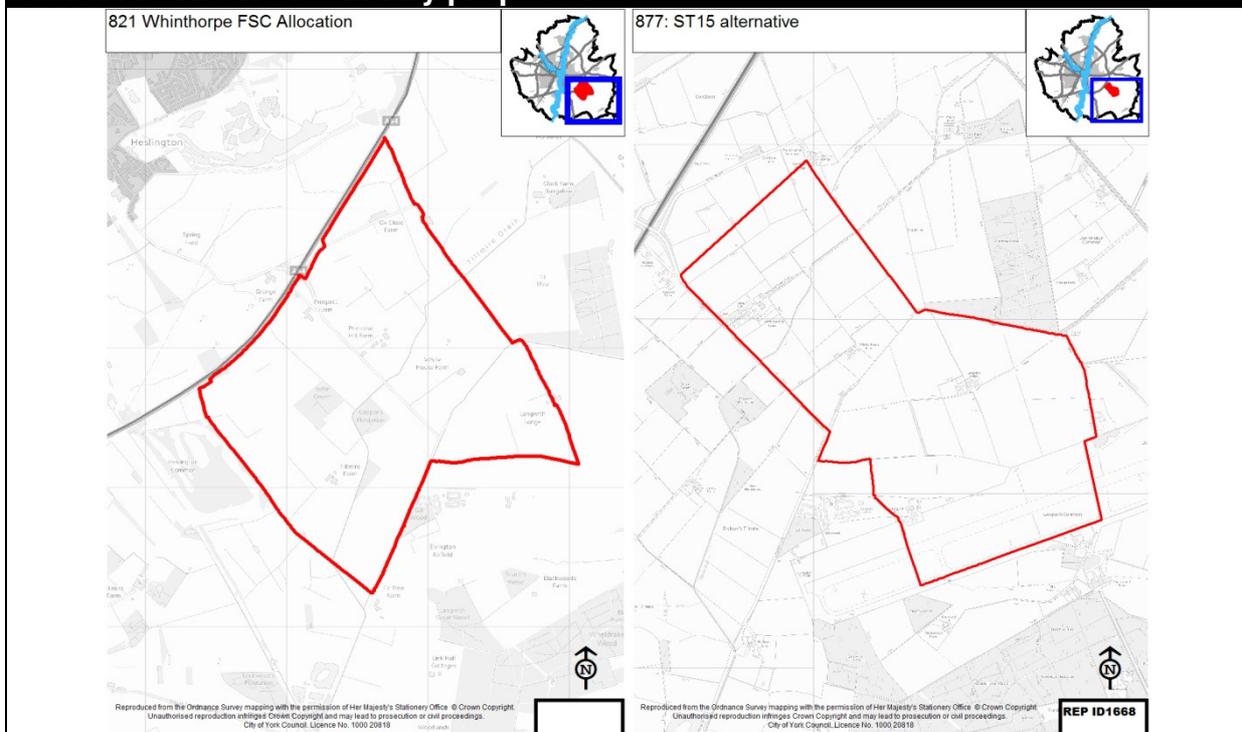
less sensitive areas be fully explored before any allocation is made in the Local Plan.

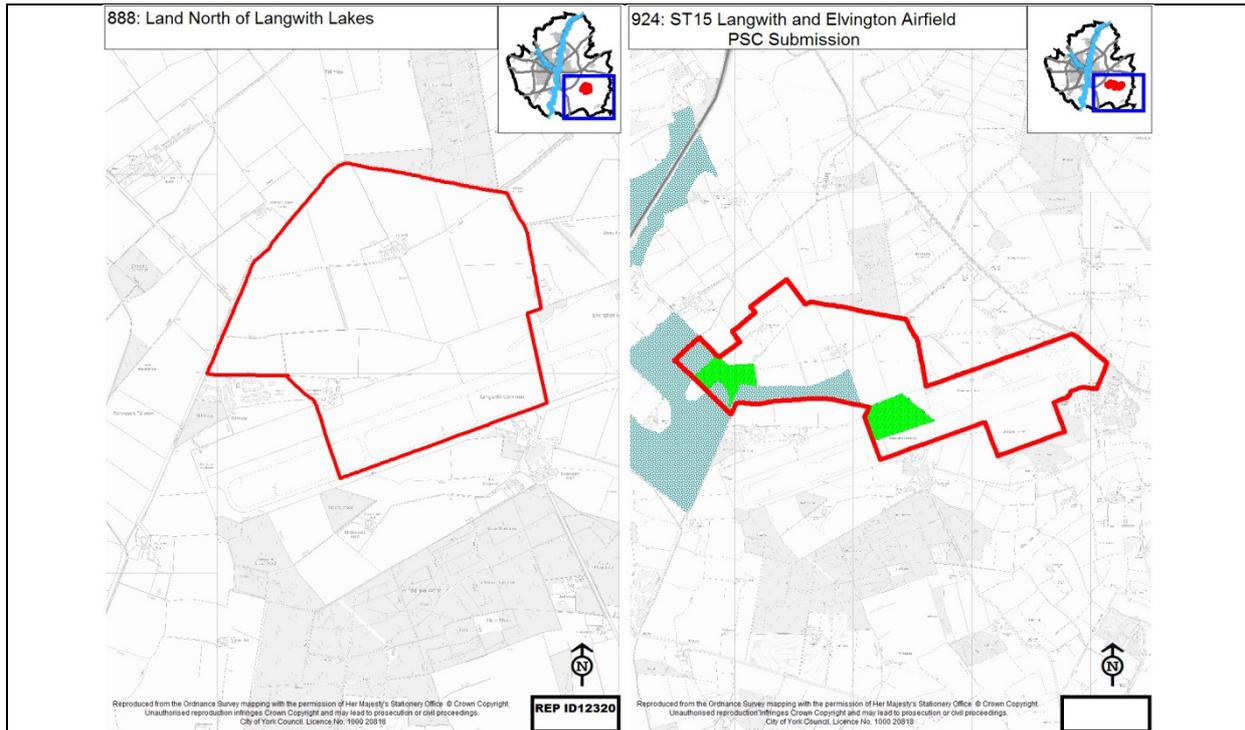
- Some concerns regarding green belt however a stand alone new village is preferable to 'bolting on' large areas of housing to existing village (like ST33). The development would integrate infrastructure to help achieve sustainability objectives and a Garden Village design would provide appropriate spatial layout of housing, green space and amenity open space. (Wheldrake PC).
- To facilitate ST15 objectives, significant visual and acoustic landscape separation from any new settlement must be incorporated to minimise potential conflict between the proposed residential and established aviation uses. Comment requests that due recognition be given to the Museum and Memorial's long-established and fundamental operation requirements (note reference to 1998 Development Brief) (Yorkshire Air Museum & Allied Air Forces Memorial).
- Yorkshire Ambulance Service request that specific text is included within the allocation to make provision for a spoke facility (specification given) (Yorkshire Air Ambulance Service)
- Changes to site's capacity and location (further south of the ORR) mean ambitions for sustainable transport provision are less likely to be delivered. Note support for continued inclusion of measures to protect the Tilmire (York Green Party).
- Notes proximity of the site to proposed alternative site for business park (Land East of York Designer outlet). This could provide employment opportunities for ST15's new residents. (How Planning obo Oakgate Group and Caddick Group).
- Support the reduction in size of this allocation from 392ha to 159ha and from 4680 homes to 3340 and back the proposal to move the site southwards to protect the character and setting of York and Heslington Village as well as utilising the brownfield development opportunity at Elvington Airfield. However, also recognise that local residents continue to have concerns about the proposed development. A key challenge will be to address issues over transport infrastructure. There should be no car or bus access through Heslington Village and access to site coming via the A64 and Elvington Lane. A robust transport strategy will need to consider access issues for local residents and work should ensure the protection of Heslington Tilmire SSSI (Cllr Keith Aspden).

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

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

**ST15: Alternative boundary proposed**





**Barratt & David Wilson Homes**

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

Barratt and David Wilson Homes

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



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

Sandby (York) Ltd and Oakgate / Caddick Group

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

**General issues raised in relation to Area 2**

<b>Total representations:</b> 6	<b>Support:</b> n/a	<b>Objections:</b> 1	<b>Comments:</b> 5
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**Key Issues Raised**

<b>Support</b>	N/A
<b>Objection</b>	<ul style="list-style-type: none"> <li>Objection to the development in the Elvington area on the</li> </ul>

	<p>following grounds: proposed housing levels are too high and likely to exacerbate existing traffic congestion; likely adverse impact on wildlife; development will erode the character and identity of Elvington Village.</p>
<b>Comment</b>	<ul style="list-style-type: none"> <li>• Area 2: Elvington - The LP Preferred Sites has been subject to 2 local public drop in sessions to assess public opinion. The PC does not oppose new residential/employment developments - but the PC has never been asked what the village actually needs - we consider the methodology to be wrong. It is clear that the village needs a better mix of properties such as larger houses and affordable homes (Elvington PC).</li> <li>• Other comments raised suggested that the preferred sites in this area could ruin the rural setting of Elvington (which needs protecting) and a 'new town' could be damaging to the area, especially if no infrastructure to support it. It was also suggested that the area should be left for business expansion , such as the University of York and Elvington (Research laboratories and agricultural museum. Conversely, it was also suggested that the area could support more development as it would not impact on existing residents of York and would give easy access for the A64, for employers and retailers.</li> </ul>

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

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

928: Land surrounding Terrys Car Park

Henry Boot Developments

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

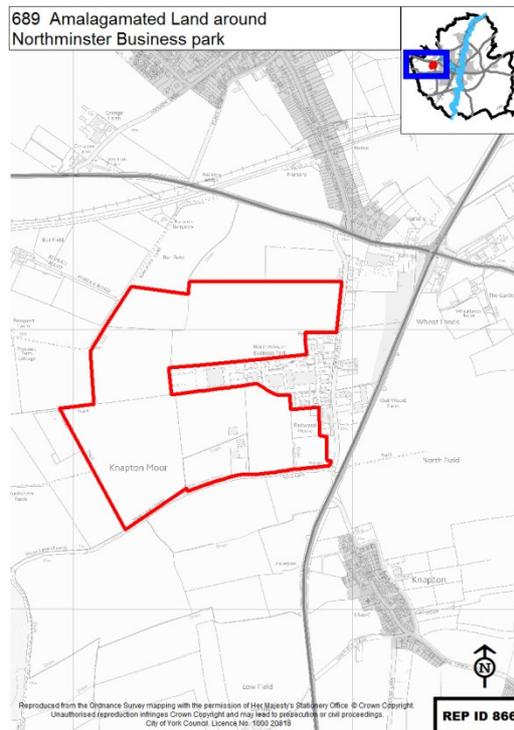
<b>ST17: Nestle South</b>	
<b>Total representations: 9</b>	<b>Support: 4</b>
<b>Objections: 2</b>	<b>Comments: 3</b>
<b>Key Issues Raised</b>	
<b>Support</b>	<p>Historic England supports the Plan's stated Planning Principles and expect much of the commentary regarding the need for a masterplan to be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

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

<b>ST19: Northminster Business Park (formerly E17)</b>			
<b>Total representations: 31</b>	<b>Support: 3</b>	<b>Objections: 23</b>	<b>Comments: 6</b>
<b>Key Issues Raised</b>			
<b>Support</b>	A small number of responses support the principle of the allocation, including Northminster Ltd who state that the existing internal infrastructure is capable of being extended to allow immediate further development. The area is suitable for all types of use class/ occupiers will be available. Access will be via the existing site entrance. The park is well screened and extensions will be integrated into this environment. Works will take place to help deliver a sustainable and integrated transport system helping to ease the traffic burden. The proposed allocation and safeguarding of land on surrounding land to the South, North and West of the Park will provide further capacity to meet employment needs for the future. All surface and foul water run-off is privately managed on site and controlled at agreed rates with the IDB and Yorkshire water. No archaeology has been found on site. Ecology is not a concern. Proposes that the site is used for use class B1 (b), B1 (c) B2 and B8. (note suggested boundary change).		
<b>Objection</b>	<p>Amongst others, Nether Poppleton Parish Council, Upper Poppleton Parish Council, and Historic England object to the scale of development proposed and its likely impact on the openness of the green belt, historic character and setting of the city and villages of Poppleton and Rufforth. Historic England Advises that, to retain separation between Northminster and nearby villages, the southern extent of the site should extend no further than the existing car park to the south of Redwood House.</p> <p>Amongst many others, the Parish Councils note a number of further concerns, including:</p> <ul style="list-style-type: none"> <li>• the impact of transport access and egress on residents, stating that it would further impact on their quality of life and increase problems at an already congested junctions;</li> <li>• whether employment expansion in this area is justified given that office space elsewhere remains vacant;</li> <li>• amenity impacts – Northfield Lane is used by walkers, cyclists, horse-riders etc;</li> <li>• loss of agricultural land.</li> </ul>		

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

**ST19: Alternative boundary proposed**



Northminster Ltd

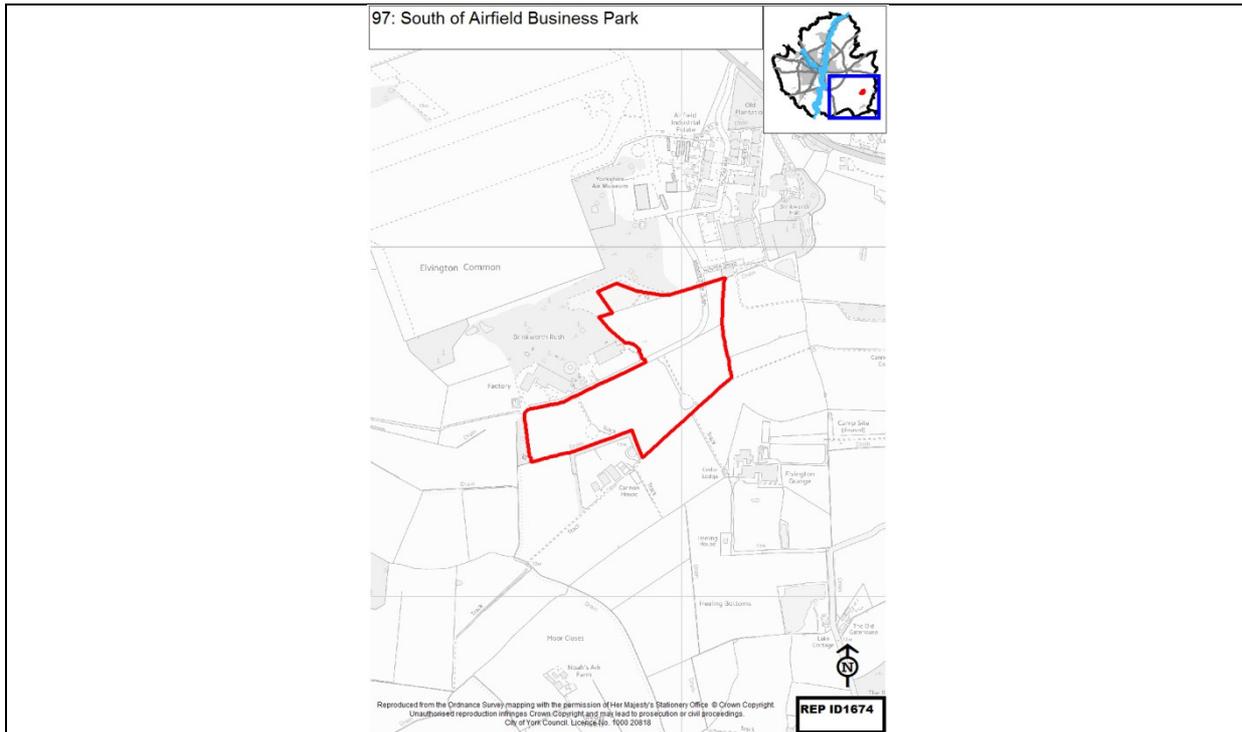
Northminster Ltd have submitted various representations to previous stages of the Local Plan process to present the case for the allocation land at Northminster Business Park. This includes a masterplan which shows the potential to lay the Park out across land to the south of the existing business park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

**ST19: General Area comments for Area 5**

<b>Total representations: 23</b>	<b>Support: 1 relevant</b>	<b>Objections: 3 relevant</b>	<b>Comments: 9 relevant</b>
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<b>Key Issues Raised</b>	
<b>Support</b>	
<b>Objection</b>	General concerns for the large amount of housing in this area of York. There are also concerns for; increased traffic inadequate drainage and lack of infrastructure and services.
<b>Comment</b>	General comments on the large amount of housing in this area of York. There are also comments on; increased traffic inadequate drainage and lack of infrastructure and services.

<b>ST26: Land south of Elvington Airfield</b>			
<b>Total representations: 19</b>	<b>Support: 9</b>	<b>Objections: 6</b>	<b>Comments: 5</b>
<b>Key Issues Raised</b>			
<b>Support</b>	<p>Amongst others, Elvington Parish Council and W Birch and Sons support the principle of developing the site. Conditions on support include:</p> <ul style="list-style-type: none"> <li>• That development should be conditional on archaeological/ecological assessment;</li> <li>• restricted B1/B8 use;</li> <li>• weight limits on Main Street.</li> </ul> <p>W Birch and Sons further confirm that there is already interest in the site. Therefore the site may be developed and occupied before the Local Plan process has been completed. We believe that further land should be allocated to for development to respond to the on going demand for land in this location. (note suggested boundary alteration)</p>		
<b>Objection</b>	Objectors to the scheme cite the impact of development on agricultural land/open countryside, increased volumes of heavy goods vehicles and impact on Elvington Lane and Village as significant concerns.		
<b>Comment</b>	Comments reflect concerns above. Yorkshire Wildlife Trust also comments that there is potential for considerable ecological interest on site and adaptation measures through very well designed green space.		
<b>ST26: Alternative boundary proposed</b>			



W Birch and Sons

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

**ST26: General Area comments for Area 2**

<b>Total representations: 6</b>	<b>Support: 0</b>	<b>Objections: 1 relevant</b>	<b>Comments: 4 relevant</b>
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**Key Issues Raised**

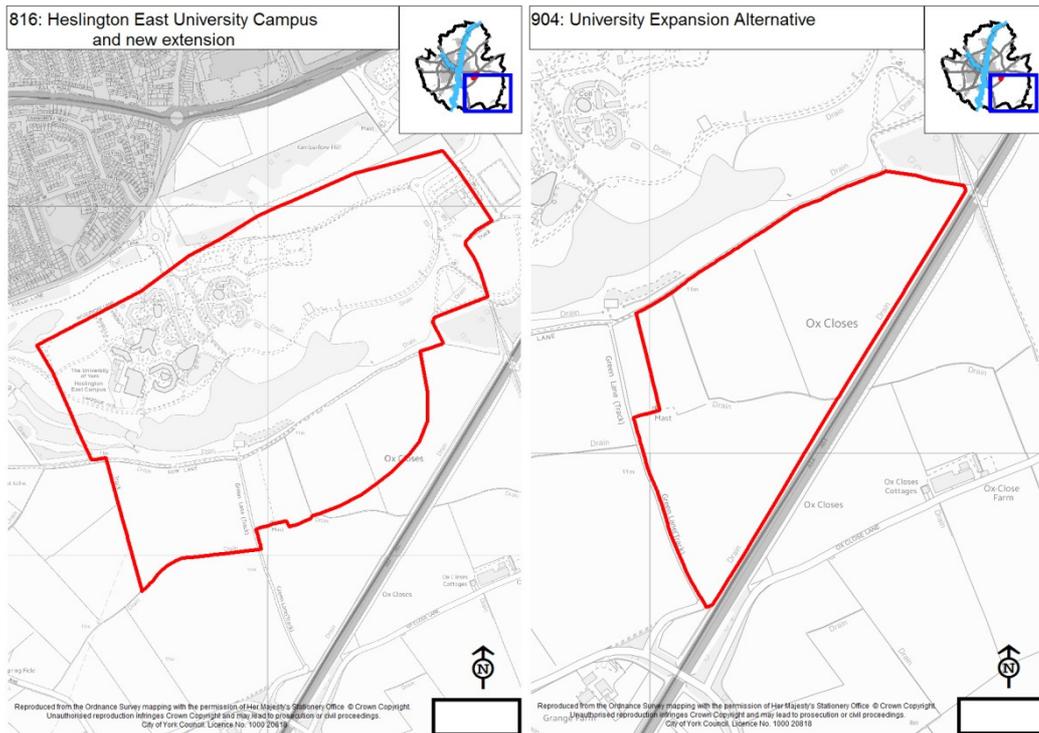
<b>Support</b>	
<b>Objection</b>	The general public express concerns for issues with; increased housing, increased traffic and congestion (note also implications for highway safety/pollution), negative impacts on wildlife, character and identity.
<b>Comment</b>	The general public express comments that,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

<b>ST27: University of York</b>	
<b>Total representations: 27</b>	<b>Support: 5</b>
<b>Objections: 12</b>	<b>Comments: 12</b>
<b>Key Issues Raised</b>	
<b>Support</b>	<ul style="list-style-type: none"> <li>Note that vehicular access from the A64 would be essential to protect sustainable transport priority access into Heslington East northern access points. Managing cumulative impact of traffic generation will need significant investment in sustainable transport solutions (light rail/tram link) to join site to city centre, university campuses and ST15 (York Green Party).</li> <li>Supports principle of allocation, providing expansion space guaranteeing the University's future contribution to the need for education and research, and to the local, regional and national economies. Comment references the Publication draft Local Plan 2014, which states 'without the campus extension, the University will not be able to continue to grow beyond 2023'. The University appreciates the benefits of exploiting synergies with the proposed new settlement ST34, in terms of servicing including transport, energy and waste. Of major benefit would be a direct access to A64 from the campus extension, if this is provided by the promoters of ST34 (O'Neill Associated on behalf of University of York);</li> <li>Generally, where members of the public supported the allocation, it was suggested that certain criteria are met – such as no direct access from Heslington, uses should only be for University use rather than general employment, public rights of way are protected, and the historic views of the City are not compromised, it reflects evidence that well connected locations close to knowledge base are a significant driver for investment in the science / technology sectors.</li> </ul>
<b>Objection</b>	<ul style="list-style-type: none"> <li>Land is good agricultural land and classified as green belt. The proposal would compromise setting of the village and views. Village will be used as main thoroughfare between new development and Heslington West (Heslington PC).</li> <li>Site highly visible from A64 and would intrude into open land, development would be contrary to green belt purposes, new junction off A64 would have landscape impacts, even with new A64 junction, development would have serious traffic consequences (Fulford PC);</li> <li>The development potential of the proposed allocation is significantly reduced by the need to incorporate a substantial landscape buffer to A64 and the exclusion of land east of Green Lane, which is outside the control of the University. The remainder of the allocation would be only 21.5has, providing for less than 50% of the University's expansion needs within the plan period to 2032, and could not cater for compliance with Council policy on the provision of student housing and knowledge based business facilities. See supporting 'Assessment of Visual effects' for further</li> </ul>

	<p>appraisal. Note that to not provide for the University's future development needs would impact on the City's ability to confirm a permanent green belt for the first time. (O'Neill Associates on behalf of University of York);</p> <ul style="list-style-type: none"> <li>• YOC oppose the development of this site. This is a potential SINC site, but the PSC document does not mention the wildlife value of the southern part of this site. As a result there is no discussion of mitigation measures and without these it is likely there would be a significant negative impact on the wildlife value of the site (York Ornithological Club).</li> <li>• Proposal could harm two elements which contribute to special character of the historic city. Prominent views of site from A64 very close to ring road and expansion would change relationship between York and countryside to south. Landscape buffer could be damaging if it adds 'alien' features to flat landscape. Site could damage relationship between York and its villages, reducing the gap. Could result in serious harm to SA objective 14 (Historic England).</li> <li>• Where members of the public objected, the comments were generally based on loss of Green Belt, loss of open space, adverse effect on historic character and setting / visual impact, over development in this location, access / traffic concerns, parking pressures, and that the University should be providing more on-site student accommodation, Heslington should be protected from becoming a direct route between the two campuses, no additional infrastructure or roads in the green belt, needs buffers, over development of Heslington, land at the western campus should be developed before the eastern side, any associated housing should be subject to an Article 4 Direction, more work places will create more demand for housing,</li> </ul>
<p><b>Comment</b></p>	<ul style="list-style-type: none"> <li>• Provided the planning principles set out in PSC document are adhered to, should be possible to develop site without compromising setting of Heslington and historic views of York (Heslington Village Trust);</li> <li>• ERYC queried whether the scale and type of development proposed on ST15 and ST27 (within the plan period) would be able to support the construction of a new junction on the A64 (East Riding of Yorkshire Council).</li> <li>• The site should be designed so that new lakes, scrub and grass land do not lose their value for wildlife and that ecological impacts and the needs assessment should be included in the notes for ST27 (Yorkshire Wildlife Trust).</li> <li>• Where members of the public commented, the comments were generally based on the recognition of the need for a thriving</li> </ul>

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

**ST27: Alternative boundary proposed**



University of York (O'Neill Associates)

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

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

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

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

**General issues raised in relation to Area 2**

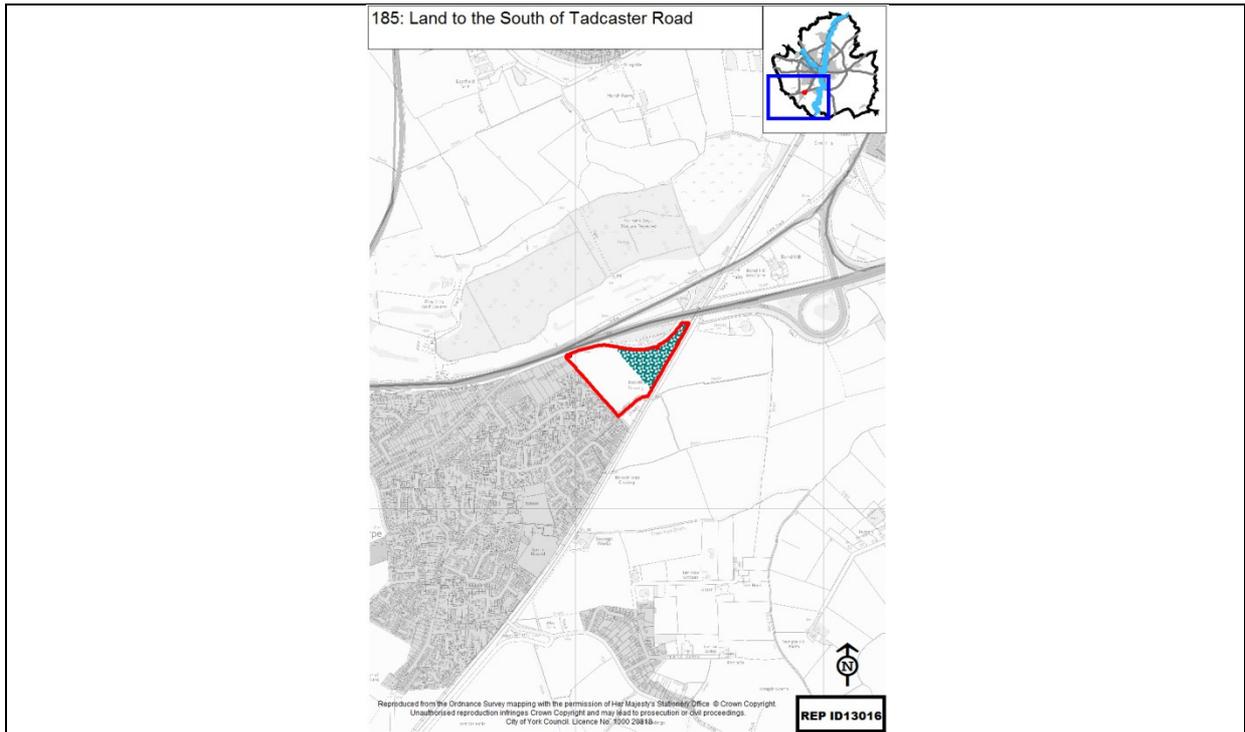
**Total representations: 6    Support: n/a    Objections: 5    Comments: 1**

**Key Issues Raised**

<b>Support</b>	N/A
<b>Objection</b>	<ul style="list-style-type: none"> <li>Objection to the development in the Elvington area on the following grounds: proposed housing levels are too high and likely to exacerbate existing traffic congestion; likely adverse impact on wildlife; development will erode the character and identity of Elvington Village.</li> </ul>
<b>Comment</b>	<ul style="list-style-type: none"> <li>Area 2: Elvington - The LP Preferred Sites has been subject to 2 local public drop in sessions to assess public opinion. The PC does not oppose new residential/employment developments - but the PC has never been asked what the village actually needs - we consider the methodology to be wrong. It is clear that the village needs a better mix of properties such as larger houses and affordable homes (Elvington PC).</li> <li>Other comments raised suggested that the preferred sites in this area could ruin the rural setting of Elvington (which needs protecting) and a 'new town' could be damaging to the area, especially if no infrastructure to support it. It was also suggested that the area should be left for business expansion, such as the University of York and Elvington (Research laboratories and agricultural museum). Conversely, it was also suggested that the area could support more development as it would not impact on existing residents of York and would give easy access for the A64, for employers and retailers.</li> </ul>

<b>ST31: Land south of Tadcaster Road Copmanthorpe</b>	
<b>Total representations: 92   Support: 52   Objections: 37   Comments: 7</b>	
<b>Key Issues Raised</b>	
<b>Support</b>	<p>Support received for the principle of housing development on the site, including from Copmanthorpe Parish Council, Cllr David Carr and Gladman Developments. It is noted that the site is also included in the draft Copmanthorpe Neighbourhood Plan.</p> <p>Where support is recorded, in general there is reference made to the potential for Copmanthorpe to absorb the proposed scale of development without undue pressure on existing services/infrastructure, or that the Plan should provide for additional infrastructure/services to mitigate potential impact.</p> <p>Additional considerations raised through consultation include:</p> <ul style="list-style-type: none"> <li>• Setting back houses from the main road;</li> <li>• Site is preferable to loss of green belt land (referencing sites included in a previous iteration of the Local Plan);</li> <li>• Need to consider impact of development on semi-rural character of the village, including appropriate densities and protection of trees and hedgerows;</li> <li>• Note public byway at Yorkfield Lane;</li> <li>• No pedestrian/secondary access from Learman’s Way;</li> </ul>
<b>Objection</b>	<p>While supporting the principle of development, both Copmanthorpe Parish Council and Cllr Carr object to the housing density and the number of houses proposed, stating that numbers would overwhelm village amenities, school, medical facilities and drainage as well as roads. Cllr Carr further requests that the small triangle of land to the south of Yorkfield Lane should not be included within the development boundary.</p> <p>Historic England notes that developing the site would further reduce the gap between York’s urban area and Copmanthorpe, harming a key element of the special character and setting of the City as identified in the Heritage Topic Paper. They recommend that the site be deleted since it is not possible to mitigate against identified harm.</p> <p>RSPB considers that there is currently insufficient information on the potential impacts of ST31 on Askham Bog SSSI, and the required mitigation, in the Local Plan and supporting documents.</p> <p>Amongst others, Shepherd Group Properties, Linden Homes and David Wilson Homes object to the site’s inclusion on the grounds that the allocation is contrary to the Council’s own evidence base, notably that it failed the site selection methodology and serves an important green belt purpose (preventing coalescence) which is important in preserving the special character and setting of the city.</p>

	<p>A number of further issues were raised in objection to development of ST31, as follows:</p> <ul style="list-style-type: none"> <li>• Impact of additional traffic on local highway network;</li> <li>• Inadequate infrastructure;</li> <li>• Impact on natural environment, including Askham Bog, local wildlife, trees and hedgerows;</li> <li>• Insufficient local amenities;</li> <li>• Impact on flood risk, including potential for surface water flooding impacting Flaxman Croft estate;</li> <li>• Both the scale of development and development density proposed are too high;</li> <li>• Loss of green belt/agricultural land.</li> </ul>
<b>Comment</b>	<p>Natural England confirms that the combination of the location of the A64 and provision of natural greenspace adjacent to the proposal would adequately mitigate for potential recreational pressures on Askham Bog; the topography of the site reduces the risk of impacts on hydrology from development. They advise that requirement for hydrological investigation and mitigation as necessary is included as a requirement in the plan. They suggest that the Council considers requiring the delivery of the adjacent green space allocation prior to the commencement of development and further advise contact with Yorkshire Wildlife Trust regarding potential for impacts on noted SINC's and uncommon plant species in the area.</p> <p>Yorkshire Wildlife Trust is satisfied that development maintains existing barriers between development and the reserve (Askham Bog), and that any hydrological connection is unlikely.</p> <p>Other comments received refer to the need for the Plan to include development principles which ensure: protection of the natural environment; managed traffic access/egress; an appropriate response to additional demand on local services, loss of visual amenity, drainage, flooding, heavy locomotives causing vibrations, loss of green space and noise and air pollution.</p>
<b>ST31: Alternative boundary proposed</b>	



Cllr David Carr

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

**General issues raised in relation to Area 1**

<b>Total representations:</b>	<b>Support: 14</b>	<b>Objections: 3</b>	<b>Comments:</b>
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**Key Issues Raised**

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

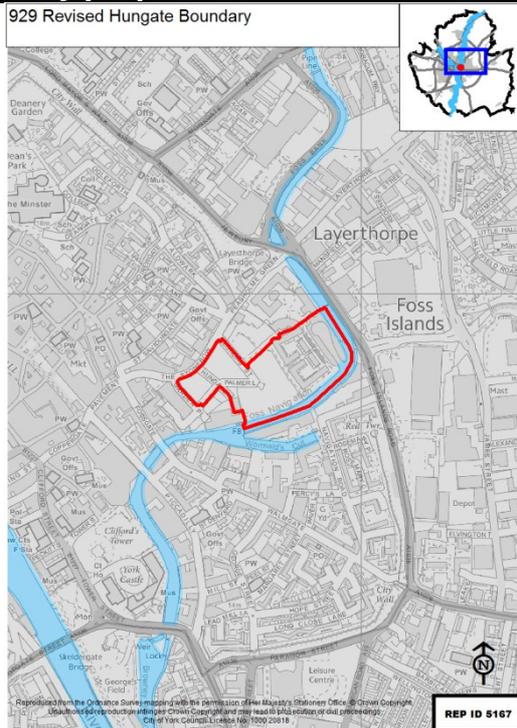
**ST32: Hungate (Phases 5+)**

**Total representations: 5    Support: 1    Objections: 2    Comments: 2**

**Key Issues Raised**

<b>Support</b>	Hungate (York) Regeneration Limited supports provisions for the Hungate site as set out in ST32. Note, for clarity, site capacity should be amended to 1025 (to include 720 granted by 15/01709/OUTM and further 305 identified through emerging Local Plan.
<b>Objection</b>	n/a
<b>Comment</b>	General comments around additional demand on education/medical facilities; impact on flood risk.

**ST32: Alternative boundary proposed**



Hungate (York) Regeneration Limited

Boundary should remove the Hiscox building.

**ST32: General Area comments for Area 4**

**Total representations: 9    Support: 1 relevant    Objections: 1 relevant    Comments: 2 relevant**

**Key Issues Raised**

<b>Support</b>	n/a
<b>Objection</b>	The general public express concerns that development proposed has not been tested yet.
<b>Comment</b>	The general public express comments on the impact the increased number of houses in this area will have on the city, the green belt and the historic setting of York. Comments were also made that some of the buildings should be demolished and replaced by a good looking housing complex.

<b>ST33: Station Yard Wheldrake</b>			
<b>Total representations: 39</b>	<b>Support: 8</b>	<b>Objections: 31</b>	<b>Comments: 1</b>
<b>Key Issues Raised</b>			
<b>Support</b>	<p>Vernon Land Partnerships supports the draft allocation. The site is entirely appropriate, suitable and deliverable for residential development and should be allocated accordingly as set out within the Draft Plan.</p> <p>Other supportive comments refer to the site being the best options should development land be required in Wheldrake, and that development could help support the village's services.</p>		
<b>Objection</b>	<p>Wheldrake Parish Council notes that the Village Design Statement does not support the proposed development, which is located on good quality agricultural land and recognised green belt. A Planning Application for development on part of the site has previously been rejected on the grounds of noise impacts on proposed adjacent properties. Site would be more appropriately used for employment expansion.</p> <p>RSPB states that, in the absence of a HRA having been completed, this allocation is at risk of being neither legally compliant with the Conservation of Habitats and Species Regulations 2010 nor sound, as it may not be effective, justified or consistent with national planning policy.</p> <p>Several common themes raised in objection to the proposed allocation, including:</p> <ul style="list-style-type: none"> <li>• Amongst other objectors, Julian Sturdy MP notes concerns around the impact of development on local facilities/services and infrastructure capacity;</li> <li>• the overdevelopment of the site, incompatible with village character. Some comment that development of a smaller scale, on the brownfield part of the site, would be more suitable;</li> <li>• loss of green belt, open countryside and views;</li> <li>• impact on wildlife;</li> <li>• Note part of site has previously been refused consent as beyond the threshold to be supported by existing services.</li> </ul>		
<b>Comment</b>	<p>General concern for lack of infrastructure (medical facilities and educational facilities), access, transport issues and increased traffic, road safety, large housing capacity, impact on drainage and flooding and environmental quality (AQ/noise/contamination).</p>		
<b>ST33: General Area comments for Area 2</b>			
<b>Total representations: 6</b>	<b>Support: 0</b>	<b>Objections: 1 relevant</b>	<b>Comments: 1 relevant</b>
<b>Key Issues Raised</b>			
<b>Support</b>	n/a		
<b>Objection</b>	<p>General concerns for issues with; increased housing, increased traffic and congestion (note also implications for highway safety/pollution), negative impacts on wildlife, character and identity.</p>		
<b>Comment</b>	<p>General comments on traffic issues suggesting easy access to the A64 and to existing large retailers and employers.</p>		

### Potential General Housing/Employment Allocations

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

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

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

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

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

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

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

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

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

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

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

**H10: Barbican**

	Further comments address the potential implications for infrastructure/local services and the need to deliver affordable homes for young working people.
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**H20: Oakhaven EPH**

**Total representations: 3    Support: 2    Objections: 0    Comments: 1**

**Key Issues Raised**

<b>Support</b>	Representation received from CYC Older Persons Accommodation Programme. Care Home closed March 2016. The Executive have agreed to re-develop for extra care housing (Use class C3). The overall quantum for the site is likely to be 30 to 40 units therefore PSC site capacity should be increased
<b>Comment</b>	Comment queries whether site may be overdeveloped.

**H21: Woolnough House**

**Total representations: 3    Support: 1    Objections: 0    Comments: 2**

**Key Issues Raised**

<b>Support</b>	General support for redevelopment of a brownfield site.
<b>Comment</b>	Representation received from CYC Older Persons Accommodation Programme which states that Woolnough House will remain in operation as a residential care home and will only close and be available for re-development once consultation on the option to close has been undertaken and following that should Executive make a decision to close.  Comment queries whether site may be overdeveloped.

**H22: Heworth Lighthouse**

**Total representations: 2    Support: 1    Objections: 0    Comments: 1**

**Key Issues Raised**

<b>Support</b>	Support redevelopment of Brownfield land.
<b>Comment</b>	Original plan was for 13 homes, now 15(14% increase) indicating a potential cramming of houses.

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

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

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

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

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

<b>H39: North of Church Lane, Elvington</b>			
<b>Total representations: 100</b>	<b>Support: 3</b>	<b>Objections: 91</b>	<b>Comments: 6</b>
<b>Key Issues Raised</b>			
<b>Support</b>	<p>Supports relate to the site being a logical extension to the village and preferable to the allocation of site at Dauby Lane (H26).</p> <p>The developer/landowner supports allocation in principle and confirms that site is suitable, deliverable and viable. Suggest that site viable to deliver 28 dwellings. Larger boundary could be accommodated without detrimental effect on Green Belt or village. Existing village boundary not defensible in long-term. Reconsider larger site 789 (West of Beckside).</p>		
<b>Objection</b>	<p>Objections are raised in relation to the following issues:</p> <ul style="list-style-type: none"> <li>• Impact on character of village;</li> <li>• Loss of greenbelt land;</li> <li>• Concerns over access to site and impact on local roads including Beckside and Church Lane. Roads and footpaths are narrow, rural roads and concerns for pedestrian safety and parking;</li> <li>• Impact on surface water and water pressure;</li> <li>• Lack of capacity in existing local facilities including school places; and</li> <li>• Loss of wildlife habitats including SINC quality hedgerows.</li> </ul> <p>Elvington Parish Council comments that a previous inspector determined this site serves green belt purposes. Extra traffic would be generated from 32 homes and adversely impact on exiting residents of Beckside. Density of homes should be similar to existing Beckside development to minimise any 'difference' to the phases.</p> <p>In the absence of a HRA having been completed, the RSPB note that his allocation is at risk of being neither legally compliant with the Conservation of Habitats and Species Regulations 2010 nor sound, as it may not be effective, justified or consistent with national planning policy.</p>		

**H39: North of Church Lane, Elvington**

<b>Comment</b>	<p>Comments generally reflect objections concerns summarised above, in relation to scale of development and its impact on local infrastructure.</p> <p>Concerned about this site due to issues with the extra traffic that will be generated and the negative impact this will have on local residence. (Julian Sturdy MP)</p> <p>Environment Agency - site is located close to River Derwent and Derwent Valley SAC/SPA/Ramsar/SSSI. This is a designated site which is failing to meet its protected area objectives and WFD objectives and efforts to improve this stretch of river and associated water dependent habitats come under the Derwent Restoration Plan. One of the key issues is sediment. Should the site remain as an allocation it would be critical to ensure that sediment from the construction site does not end up in the River or local ditches. Ideally Surface Water should not be discharged into the river. Checks must be made by CYC to ensure that no cross connections on completion to ensure no contamination.</p>
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**H43: Manor Farm Yard, Copmanthorpe**

**Total representations: 51 | Support: 41 | Objections: 7 | Comments: 4**

**Key Issues Raised**

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

**H46: Land North of Willow Bank\_ New Earswick**

**Total representations: 86 | Support: 5 | Objections: 48 | Comments: 35**

**Key Issues Raised**

<b>Support</b>	Both objections and comments to the scheme raise similar issues: the likely impact of development on traffic and congestion (locally, and onto the A1237), lack of local services/infrastructure, poor drainage and flood
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<b>H46: Land North of Willow Bank _ New Earswick</b>	
	<p>risk. Concerns are also raised regarding the loss of the sports club and MUGA in New Earswick.</p> <p>Strensall with Towthorpe Parish Council notes that the site represents the views of residents of the Parish.</p> <p>The Joseph Rowntree Housing Trust fully supports the councils proposed allocation and will support the allocation. The site has access to regular buses and CYC highways officers have no adverse comments on traffic. The site did not form part of one of the important green wedges. It is not anticipated that any contamination or contamination that cannot be remediated will arise. Suitable vehicular access into the site will be provided along with pedestrian and cycle access. The tree belt along the eastern edge of the site is to be excluded. The site will promote a mixed of cohesive community providing a wide range of housing mix. The site is not at risk of flooding. The proposal will be sustainable in terms of physical characteristics, character and social composition. residential development are to be built away from listed buildings. Changes have been made to the layout of for more flexible living and self- help ethos. This development will help meet the Trust's and The City's need for affordable housing. The proposal will not affect visual importance as views of the church are now all but obscured by the dense tree belt along the eastern boundary and landscape character will be retained. Note objection to development yield and open space provision</p> <ul style="list-style-type: none"> <li>- River Foss Society support the principle of a green corridor, and consider that the run-off from the site could be containable through the implementation of SUDS.</li> </ul>
<b>Objection</b>	<p>Both objections and comments to the scheme raise similar issues: the likely impact of development on traffic and congestion (locally, and onto the A1237), lack of local services/infrastructure, poor drainage and flood risk. Concerns are also raised regarding the loss of the sports club and MUGA in New Earswick.</p> <p>New Earswick Parish Council raises objection to development on the following grounds: flood risk in local area; drainage and sewerage issues; loss of open space, both in visual terms and as a longstanding recreational area; insufficient local amenities and services to accommodate additional demand; additional traffic congestion (Haxby Road) and potential parking issues. Site should instead be defined as green belt.</p>

**H46: Land North of Willow Bank\_ New Earswick**

Huntington and New Earswick Liberal Democrat Cllrs raise concerns about loss of recreational space and loss of the sports club and MUGA. This land is the only major area of recreational land for New Earswick and also used by people from Huntington. It should be retained for future recreational facilities. The desire of JRHT to develop housing here is distorting its provision in the village. Loss of recreation space near Red Lodge makes this area more important as a relocation site for this use. Since Brexit and resulting reduced international migration there should be further reviews of smaller site requirement, therefore, this site should be removed from the Plan.

While Joseph Rowntree Housing Trust fully support the site's allocation, they object to the Council's stated reasoning for the split between built and open space; they do not consider it possible to produce a housing scheme for 104 dwellings on approx half of the site in a form which reflects the character of the village itself. It is not accepted that there is a deficiency of open space in New Earswick. It is not accepted that the site is part of a local green infrastructure corridor linking New Earswick and Huntington along the Foss corridor. Ecological concerns have now been clarified and resolved. The site will promote a mixed of cohesive community providing a wide range of housing mix. The site is not at risk of flooding. The proposal will be sustainable in terms of physical characteristics, character and social composition. residential development are to be built away from listed buildings. Changes have been made to the layout of for more flexible living and self- help ethos. This development will help meet the Trust's and The City's need for affordable housing. The proposal will not affect visual importance as views of the church are now all but obscured by the dense tree belt along the eastern boundary and landscape character will be retained.

**Comment**

General comments reflect the concerns of objectors above, around the impact of development on local infrastructure.

Historic England raises no objection in principle, but comments that the plan should make it clear that any development would need to ensure that those elements which contribute to the significance of the New Earswick Conservation Area are not harmed.

Yorkshire Wildlife Trust note that bats are likely to live on site and lighting of new housing would disturb them and the layout of the site will need to factor this in by possibly locating housing to the South of the site.

Wigginton Parish Council do not object in principle but comment that the

**H46: Land North of Willow Bank\_ New Earswick**

	<p>necessary infrastructure must be addressed before development commences, in terms of schools; housing mix and type; upgrades to transport infrastructure (strategic network and local roads); public transport; congestion and parking; pedestrian safety; sewerage and drainage; employment, training and development; retail facilities; environmental issues; impact of construction on existing residents and businesses.</p> <p>By halving the site this allows for the concept of River Foss Regional Green Corridor which is supported. The developable area of this site would create run off with a possible knock on effect on flooding elsewhere though deemed containable through the implementation of SUDS. Question raised if SUDS standards are adequate with anticipated increases in rainfall associated with climate change and implications for Willow bank site. (River Foss Society)</p>
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**H51: Morrell House EPH**

**Total representations: 3    Support: 1    Objections: 0    Comments: 2**

**Key Issues Raised**

<b>Support</b>	Support redevelopment of Brownfield land.
<b>Objection</b>	n/a
<b>Comment</b>	Representation received from CYC Older Persons Accommodation Programme. States that Morrell House will remain in operation as a residential care home and will only close and become available for re-development once consultation on the option to close has been undertaken and following that should Executive make a decision to close.

**H52: Willow House EPH**

**Total representations: 5    Support: 1    Objections: 1    Comments: 3**

**Key Issues Raised**

<b>Support</b>	Support for use of brownfield land. Housing should be affordable and priority for young residents of the city who need housing.
<b>Objection</b>	Objection to the closure of the elderly persons home.
<b>Comment</b>	<p>Historic England – Site adjoins the City Walls (SAM) and CHCCA. Given importance of City Walls great care would need to be taken in order to ensure that the elements which contribute to their significance are not harmed.</p> <p>Note that decision has not yet been made regarding residential care</p>

**H52: Willow House EPH**

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

**H53: Land at Knapton Village**

**Total representations: 27 | Support: 3 | Objections: 22 | Comments: 2**

**Key Issues Raised**

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

**H53: Land at Knapton Village**

Further comment received re need for preservation off wildlife habitats and mature trees. Bat survey should be carried out

**H54: Whiteland Field, Haxby**

**Total representations: 275 | Support: 10 | Objections: 222 | Comments: 43**

**Key Issues Raised**

**Support**

A small number of supports were received for the site (including for Strensall with Towthorpe Parish Council) .Where support was recorded, in general there is reference made to the suitability of the site for housing and that it is a well contained site.

The developer/landowner confirms that the site is deliverable and viable.

**Objection**

A significant level of objection was received. Key issues raised include:

- impacts on local traffic congestion particularly on Usher Lane;
- current congestion levels on the A1237 and in particular the Haxby/Strensall roundabout would be compounded by further development. A number of comments refer to the need to dual the outer ring road prior to any further development taking place;
- Concern that existing public transport provision is unsatisfactory and could not provide for additional residents;
- inadequate drainage and sewerage – that the new drainage would need to be installed before any development took place, that the current sewerage system is totally inadequate in the village, that the WWTW at Strensall is at or above capacity and that currently surface water flooding regularly causes the sewers to back up in heavy rain;
- Many comments point to the need for development to be self sufficient in amenities/services, including the provision of a primary and secondary school and GP provision;
- Significant ‘piecemeal’ development has already taken place in Haxby which has already impacted upon the character of the area and the adequacy of the existing levels of community facilities; and
- Site is crossed by two high voltage pylons which would be expensive to move or require a reduction in site area.

Julian Sturdy MP states: “I do not believe that this is a logical site for inclusion in the Local Plan due to issues with, flooding, pylons and

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

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

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

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

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

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

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

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

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

**E5: Land at Layerthorpe\_James Street**

	Developments)
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**E8: Wheldrake Industrial Estate**

**Total representations: 5 | Support: 0 | Objections: 5 | Comments: 0**

**Key Issues Raised**

<b>Support</b>	n/a
<b>Objection</b>	Wheldrake Parish Council and others object to the proposed allocation due to impact on village character/Conservation Area. Infrastructure demand is also of concern.
<b>Comment</b>	n/a

**E9: Elvington Industrial Estate**

**Total representations: 13 | Support: 6 | Objections: 7 | Comments: 1**

**Key Issues Raised**

<b>Support</b>	Elvington Parish Council supports the principle of employment development at E9 (noting that the site is Greenfield rather than Brownfield as described).  William Birch and Sons, alongside a number of others, support the site as a natural extension to existing business parks at Elvington Arifield.
<b>Objection</b>	Those objecting to the proposed allocation do so on the grounds that nearby residents be affected by noise and air pollution, and the highway safety impacts of additional traffic using the access road.
<b>Comment</b>	As with Elvington Parish Council's comment above, others state that the site is Greenfield rather than Brownfield as described.

**E10: Chessingham Park\_Dunnington**

**Total representations: 4 | Support: 3 | Objections: 1 | Comments: 0**

**Key Issues Raised**

<b>Support</b>	Dunnington Parish Council supports E10 as infill development in an existing built up area.
<b>Objection</b>	Empty units already so why build more?
<b>Comment</b>	n/a

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

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

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

## Deleted Strategic Housing/Employment Allocations

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

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

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

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

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

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

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

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

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

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

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

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

**Deleted General Housing/Employment Allocations**

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

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

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

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

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

**Deleted H2b: Land at Cherry Lane**

	deletion as they consider it a deliverable and sustainable small site able to feed into the short-term housing supply.
<b>Comment</b>	n/a

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

**Deleted H9: Land off Askham Lane**

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

**Deleted H11: Land at Frederick House\_ Fulford Road – no comments received**

**Deleted H12: Land r/o Stockton Lane**

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

**Deleted H19: Land at Mill Mount – no comments received**

**Deleted H23: Grove House EPH**

<b>Total representations: 2</b>	<b>Support: 0</b>	<b>Objections: 1</b>	<b>Comments: 1</b>
<b>Key Issues Raised</b>			

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

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

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

**Deleted H26: Land at Dauby Lane\_Elvington**

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

**Deleted H27: Land at The Brecks**

**Total representations: 76 | Support: 72 | Objections: 2 | Comments: 2**

**Key Issues Raised**

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

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

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

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

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

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

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

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

**Deleted H35: Land at Intake Lane\_Dunnington**

	southern boundary of H31. On this basis there is no access constraint to development of the site
<b>Comment</b>	n/a

**Deleted H37: Land at Greystones Court\_Haxby**

**Total representations: 7    Support: 6    Objections: 1    Comments: 0**

**Key Issues Raised**

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

**Deleted H40: West Fields\_Copmanthorpe**

**Total representations: 38    Support: 37    Objections: 1    Comments: 0**

**Key Issues Raised**

<b>Support</b>	Support for the site's removal given potential impact on local infrastructure and village character. Support for the land's designation as Green Belt. Sites included now reflect the emerging Copmanthorpe Neighbourhood Plan,.
<b>Objection</b>	Site should be brought back into the Plan
<b>Comment</b>	n/a

**Deleted H48: Haxby Hall EPH**

**Total representations: 5    Support: 4    Objections: 0    Comments: 1**

**Key Issues Raised**

<b>Support</b>	Support for the site's removal from the Plan.
<b>Objection</b>	n/a
<b>Comment</b>	Potential to use site for car parking/small scale P+R if closure agreed?

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

**Deleted E1: Hungate – no comments received**

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

**Deleted E7: Wheldrake Industrial Estate – no comments received**

**Deleted E15: Land at Hull Road – no comments received**

**Deleted E16: Poppleton Garden Centre – no comments received**

## Former Safeguarded Land

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

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

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

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

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

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

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

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

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

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

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

## 6.0 Comments on the Plan's wider themes

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

6.2 Comments are summarised against the following general themes:

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

### **Duration of the Plan, Green Belt and Safeguarded Land**

#### Principle of Green Belt

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

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

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

#### Housing trajectory and 5-year land supply

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

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

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

#### Green Belt/Safeguarded land and flexible land supply

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

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

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

Conversely, a significant number of respondents consider that this approach would not deliver a 'permanent' green belt within the definition of NPPF, and as such puts the Plan at risk of being found unsound at examination. Further, several respondents add that this reduces the Council's flexibility to respond to indigenous or inward investing companies that have unforeseen requirements for growth.

*"Paragraph 83 of the National Planning Policy Framework is clear as to the approach to be taken in the identification of green belt boundaries and the timescales Planning Authorities should have in mind when undertaking this exercise for the first time. Any Local Plan which sets this advice aside without exceptional justification is at risk of being found unsound. A 20 year green belt – as is now envisaged - falls far short of the "life" we believe is expected in (very long established) national policy where a 20 year period before review is seen as a minimum."* (Joseph Rowntree Housing Trust). Several respondents raise similar points; that the plan should include sufficient flexibility to ensure that housing requirements are met and that Green Belt boundaries will not have to be altered at the end of the plan period:

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

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

#### Brownfield first

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

#### Need for a full Green Belt appraisal

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

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

#### General extent of the green belt

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

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

- Dunnington Parish Council - seeks retention of field opposite the Sports Club as a green wedge between the industrial estate and the residential part of the village which defines clearly the the southern boundary of the village. The open and rural aspect of one of the three main gateways into the village would be lost with development
- Several comments support the removal of proposed allocations to the west of Copmanthorpe, and the resultant green belt boundary which follows the village's western boundary.
- There is concern that altering Knapton's washed-over status could open the village up for further development.
- Defence Infrastructure Organisation requests that Queen Elizabeth Barracks and Towthorpe Lines are excluded from the green belt boundary.
- General support for removal of green belt allocation at Earswick.
- One comment suggests an alternative approach to the proposed inclusion of small incursions in the green belt; to locate a new settlement beyond the green belt in an adjacent authority.

## Housing Growth

### Housing Delivery

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Economic Growth

### Vision for Growth

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

### Economic Growth Forecast

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

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

#### Range and supply of sites

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

#### Linkages between housing and economic growth

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

#### Employment Sectors

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

## Gypsies, Travellers and Showpeople

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

Propose changes to policy wording include:

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

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

## Transport

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

- Area 1 - Proposed housing numbers have been reduced in this consultation. Further work is still required on impact on A64/A1237 junction. New ST31 at Copmanthorpe proposes its main access from Tadcaster Road - its impact on the A64 junction with A1036 Tadcaster Road needs further investigation. Employment sites ST25 and ST21 have been removed - further work required to establish impact on A64/A19 Fulford Junction compared to previous Local Plan. Other sites deleted from Area 1 would have impacted on a number of junctions on A64;
- Area 2 - Plan indicates reduction of houses at ST15 - this needs considering with other potential developments in the city including University Expansion. New employment site ST27 indicates future development may provide opportunity for a further restricted/limited southern access to University from A64. Access agreed in principle for ST15, however, proviso is no through route into York. Do not support the enhanced road junction included within commentary relating to University Expansion site. Impact of both these sites on Grimston Bar junction must also be considered. ST15 and ST27 we support need for detailed transport assessment and travel plan to predict impact on

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

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

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

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

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

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

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

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

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

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

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

A number of additional comments:

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

### **Infrastructure Delivery and Viability**

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

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

### **Historic Environment**

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

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

### **Sustainable Construction**

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

### **Environmental Quality**

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

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

### **Flooding and Drainage**

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

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

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

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

### **Healthcare**

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

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

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

### **Minerals and Waste incl Fracking**

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

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

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

## Natural Environment

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

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

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

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

One comments suggests the Plan include a tree planting strategy.

## Open Space

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

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

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

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

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

## **Other general comments**

### General support/objection

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

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

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

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

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

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

#### General approach to growth/spatial strategy

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

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

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

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

#### Duty to co-operate/cross-boundary issues

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

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

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

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

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

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

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

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

### SA comments

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

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

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

### Consultation process

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

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

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

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

No comments

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

## **7.0 Conclusion and next steps**

- 6.1 The Local Plan will be the development plan for York over the 15 years, from 2018 – 2033. It will include a vision for the future development of the city and a spatial strategy and will cover both strategic policies and allocations, alongside detailed development management policies. The preparation of the Local Plan follows on from the previous Local Development Framework process, Local Plan Preferred Options consultation in 2013 and Further Sites consultation in 2014.
- 6.2 Consultation comments received as part of previous consultation stages, alongside further technical work, will be used to help develop the publication local plan. The publication local plan will be subject to another round of consultation. This will give everyone another chance to object, support or comment on the sites and policies. After which, a final plan will be submitted to the Secretary of State for examination.

Annex A

Copy of Comments Form

# City of York Local Plan



## Local Plan Preferred Sites Consultation Comments Form

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

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

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

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

Are you commenting on:

Housing Growth

Employment Growth

Specific Sites

### SECTION 1: YOUR SITE COMMENTS

Site Name

Site Reference

Page number (please specify which document e.g. main document or which supporting document when stating page number)

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

**Your Comments**

**SECTION 2: YOUR PERSONAL and CONTACT DETAILS**

Name			
Organisation <i>(if relevant)</i>			
Representing <i>(if relevant)</i>			
Address			
	Postcode		
Telephone			
Email			
Signature		Date	

**SECTION 3: CONSENT**

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

To find out more about what the Council does with your personal information, [www.york.gov.uk/privacy](http://www.york.gov.uk/privacy)

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

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

**Deadline 5pm 12<sup>th</sup> September 2016**

How did you hear about this consultation?

Do you have any general comments on this consultation process?



Annex B

Copy of Consultation  
letter/Email



City & Environmental Services

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

01904 552255

14<sup>th</sup> July 2016

Dear Sir/Madam

**City of York Local Plan Preferred Sites 2016 Consultation**

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

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

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

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

Director: Neil Ferris

[www.york.gov.uk](http://www.york.gov.uk)

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

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

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

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

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

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

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

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

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

We look forward to receiving your comments.

Yours faithfully

A handwritten signature in black ink that reads "M.P. Grainger". The signature is written in a cursive style with a long horizontal stroke at the end.

Martin Grainger  
Head of Planning and Environmental Management

Enc:

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



City & Environmental Services

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

01904 552255

13<sup>th</sup> July 2016

Dear Sir/Madam

### **City of York Local Plan Preferred Sites Consultation**

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

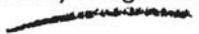
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Your views on the Preferred Sites (2016) document are sought. The purpose of the consultation is to enable the public and other interested parties to comment on additional work undertaken relating to housing and employment land need and supply and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

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Director: Neil Ferris

[www.york.gov.uk](http://www.york.gov.uk)  


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

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- 24th August at Oaken Grove Community Centre, Haxby

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

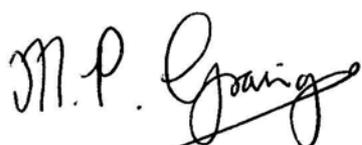
We will use the information you provide us to inform the next stage of the Local Plan and a summary of your comments will be published. A full copy of your comments (excluding personal information) will also be placed on the Council's website. Any personal information provided will be kept in accordance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

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

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

We look forward to receiving your comments.

Yours faithfully



Martin Grainger  
Head of Planning and Environmental Management

Cover email text

**PLEASE SEND FROM LOCAL PLAN INBOX**

**Subject box:** City of York Local Plan Preferred Sites Consultation

**Main text:**

Dear Sir/Madam,

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

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

Please see attached letter for more details.

Regards,

A handwritten signature in black ink that reads "M.P. Grainger". The signature is written in a cursive style with a large, sweeping flourish at the end.

Martin Grainger  
Head of Planning and Environmental Management



## Annex C

### List of Consultees

## Preferred Sites Consultation (July to September 2016)

### The following organisations were consulted:

38 Degrees, Yorkshire Wildlife Trust  
3Ps People Promoting Participation  
5 LLP  
AAH Planning  
Abode Group  
Acaster Malbis Parish Council  
Acaster Selby & Appleton Roebuck Parish Council  
Accent Group  
Acomb Green Residents Association  
Acomb Planning Panel  
Action Access A1079  
Active York  
AECOM  
Age UK  
Ainscough Strategic Land  
AKA Planning  
All Saints RC School  
Alliance Planning  
AMEC E & I UK Ltd  
Ancient Monuments Society  
Andrew Martin Associates  
Appleton Roebuck Parish Council  
Architectural & Creative Design Ltd  
Arclight  
Arcus Consultancy Services Ltd  
Arriva Yorkshire  
ASDA Stores Ltd  
Ashfield Holiday Cottages & Touring Caravan Park  
Ashtenne Industrial Fund LLP  
Askham Bryan College  
Askham Bryan Parish Council  
Askham Grange  
Askham Richard Parish Council  
Associated British Foods plc  
Atisreal UK  
Autohorn Ltd  
Aviva  
Aviva Life  
Badger Hill Residents Community Group  
BAGNARA  
Banks Development Ltd  
Banks Group  
Barratt & David Wilson Homes  
Barratt Developments PLC  
Barratt Homes & David Wilson Homes Yorkshire East & West Divisions  
Barratt Homes (York) Ltd  
Barratt Homes Yorkshire East & David Wilson Homes Yorkshire East  
Barratt Homes Yorkshire East & David Wilson Homes Yorkshire East  
Barratt Homes, Persimmon Homes, Miller Homes, Shepherd Homes, Taylor Wimpey & Helmsley Group  
Barratt/David Wilson Homes & Linden Homes  
Barrs & Co Chartered Surveyors  
Barry Crux and Company  
Barton Willmore  
Barton Wilmore  
Barwood  
Barwood Strategic Land II LLP  
BBC Radio York  
Beck Developments  
Bell Farm Residents Association  
Bellway Homes Ltd  
Bellway Homes Yorkshire Ltd  
Belvoir Farm Partners  
Bettys Café Tea Rooms  
Bilfinger GVA  
Bio-Rad Laboratories Limited  
Biovale Steering Group  
Bishop of Selby (Diocese of York)  
Bishophill Action Group  
Bishopthorpe Parish Council  
Blacker Brothers  
Blackett, Hart & Pratt LLP  
Blacklion Ltd  
Boots plc  
Bovis Homes Ltd  
Bramhall Blenkharn  
BRE  
Brian Bell Carpets Ltd  
Brimble, Lea and Partners  
British Geological Survey  
Broadacres Housing Association  
Browns of York  
BTCV (York)  
Buckley Burnett Limited  
Buglife  
Bull Balks Frontage Holders  
C B Richard Ellis Ltd  
C P R E York & Selby Branch  
Camerons Megastores  
Campaign for Real Ale

Campaign For Real Democracy  
Canal & River Trust  
Carecent  
Carers Together  
Carr Junior Council  
Carr Junior School Safe Skate Committee  
Carstairs Countryside Trust  
Carter Jonas LLP  
Carter Towler  
Cass Associates LLP  
Catton Parish Council  
CE Electric UK  
CEMEX  
Centros  
Chapelfields Residents Association  
Chevin Housing Association  
Childcare Sufficiency Group  
Chris Thomas Ltd Outdoor Advertising  
Consultants  
Christmas Angels  
Church Commissioners for England  
Church Of England Parish Of Huntington,  
Earswick & New Earswick  
Church of the Holy Redeemer Parochial  
Church Council  
Churches Together in York  
City Of York Hockey Club  
City of York Labour Party  
Civil Aviation Authority  
CLA North  
Claxton & Sandhutton Parish Council  
Clementhorpe Community Association  
Clifton Medical Practice (Dr Calder & Partners)  
Clifton Moor Business Association  
Clifton Moor Consortium (T W Fields, Barratt  
Homes, Hallam Land Mgt Ltd & Commercial  
Estates Group)  
Clifton Planning Panel  
Clifton Residents Association  
Clifton Without Parish Council  
Cobalt Builders Ltd  
Colliers CRE  
Colliers International  
Colton Parish Council  
Commercial Development Projects Limited  
Commercial Estates Group  
Community Rangers  
Compass  
Conservation Area Advisory Panel  
Consortium of Landowners of Land at Moor  
Lane  
Constructive Individuals  
Copmanthorpe Parish Council  
Copmanthorpe Residents Association  
Copmanthorpe Wind Farm Action Group  
Cornlands Residents Association  
Council for British Archaeology  
Country Land & Business Association  
Countryside Properties (Northern) Ltd  
Cowling, Swift and Kitchin  
CPP Group Plc  
CPRE (York and Selby Branch)  
Crease Strickland Parkins  
CRED Ltd (Carbon Reduction)  
Crockey Hill Properties Limited  
Crosby Homes  
CSSC Properties Ltd  
CTC North Yorkshire  
Cundalls  
CYC Mansion House  
Cyclists Touring Club (North Yorkshire)  
Cyclists Touring Club (York Section)  
Dacre Son & Hartley  
Dacres Commercial  
Daniel Gath Homes  
Dart Energy (Europe) Ltd  
David Chapman Associates  
David Wilson Homes & Linden Homes  
DE Operations North (Catterick Office)  
DEFRA  
Deighton Parish Council  
Dev Plan (Stewart Ross Associates)  
Development Planning Partnership (DPP)  
Diocese of Middlesbrough  
Diocese of Ripon and Leeds  
Directions Planning Consultancy Ltd  
DLP (Planning) Limited  
DLP Planning Ltd  
Dobbies Garden Centres PLC  
Dodsworth Area Residents Association  
Dower Chase/Dower Park Residents Group  
DPDS Consulting Group  
DPP One Ltd  
Dringhouses and Woodthorpe Planning Panel  
Dringhouses Local History Group  
Dringhouses Local History Group  
Dringhouses West Community Association  
Drivers Jonas Deloitte  
DTZ  
Dunnington & Grimston Playing Fields  
Association

Dunnington & Grimston Playing Fields Association  
Dunnington Motor Care  
Dunnington Parish Council  
Dunnington Residents Association  
DWA Architects  
Earswick Action Group  
Earswick Parish Council  
Earswick Village Housing Trust  
East Cottigwith Parish Council  
East Riding of Yorkshire Council  
Economic Development Board  
EE  
Elvington Action Group  
Elvington Action Group  
Elvington Action Group  
Elvington Action Group  
Elvington Church of England Primary School  
Elvington Church of England Primary School  
Elvington Parish Council  
Elvington Parish Council  
Elvington Park Ltd  
England & Lyle  
England and Lyle Ltd  
English Heritage Yorkshire and the Humber Region  
Environment  
Environment Agency  
Equality and Human Rights Commission  
Escrick Church of England Primary School  
Escrick Parish Council  
Escrick Park Estate  
Escrick Village Support Group  
Evans of Leeds Ltd  
EWS  
F & B Simpson, Mrs Kay and J Exton  
Fairhurst  
Fairness & Equality Board  
Family Housing Association  
Family Mediation  
Farming & Wildlife Advisory Group  
Federation of Residents and Community Associations  
Fenwick Ltd  
First York  
First/Keolis Transpennine Ltd  
Firstplan  
Fitzpatrick Commercial  
Flanagan James Limited  
Flatford Ltd  
FLP

Forestry Commission  
Foss Bank Kennels & Cattery  
Foxwood Residents Association  
FRD Ltd  
Friends Families & Travellers  
Friends Of Rawcliffe Meadows  
Friends of St Nicholas Fields  
Friends of the Earth (York and Ryedale)  
Fulford Battlefield Society  
Fulford Battlefield Society  
Fulford Community Orchard  
Fulford Friends  
Fulford Parish Council  
Fusion Online  
Gallagher Estates  
Garden History Society  
GARLAND (The Garden and Landscape Heritage Trust)  
Gate Helmsley & Upper Helmsley Parish Council  
Gem Holdings (York) Ltd  
George F White  
George Wimpey North Yorkshire Ltd  
Georgina Grace Trust  
Gerald Eve  
GHT Developments Ltd  
Gillygate Surgery  
Gladedale Estates Ltd  
Gladman Developments  
GMI Estates Ltd  
Gordons LLP  
Greenwood Residents Association  
Gregory Gray Associates  
Gregory Property Developments (Haxby) Ltd & Biorad  
Groves Residents Association  
Guildhall Planning Panel  
GVA Grimley Limited  
GVA Grimley Limited  
Halcrow Group Ltd  
Halifax Estates  
Hallam Land Management Ltd  
Hambleton District Council  
Harris Lamb Ltd  
Harrogate Architectural  
Harrogate Borough Council  
Harron Homes  
Hartley Planning Consultants  
Harton Parish Council

Haxby & Wigginton Ward Liberal Democrat  
Councillors and Haxby & Wigginton Liberal  
Democrats  
Haxby & Wigginton Youth & Community  
Association  
Haxby Town Council  
Health and Wellbeing Board  
Hempland Primary School  
Henry Boot Development Ltd  
Heslington East Community Forum  
Heslington Parish Council  
Heslington Sports Field Management  
Committee  
Heslington Sports Field Management  
Committee  
Heslington Village Trust  
Hessay Parish Council  
Heworth Planning Panel  
Heworth Without Parish Council  
Hickling Gray Associates  
High Horcom Farming Partnership  
Higher York  
Higher York Joint Student Union  
Highways Agency  
Historic England  
Hogg Builders (York) Ltd  
Holtby Parish Council  
Home Builders Federation  
Home Housing Association  
Homes & Communities Agency  
Hotel Solutions  
Hourigan Connelly  
Housing Corporation  
How Planning LLP  
Howarth Timber Group  
Huby Parish Council  
Hull Road Planning Panel  
Hungate (York) Regeneration Ltd  
Huntington & New Earswick Lib Dem  
Councillors  
Huntington Burial Authority  
Huntington Parish Council  
Huntington Rovers Football Club  
Husband and Brown Ltd  
I Can Play Tennis Ltd  
Iain Bath Planning  
Ian Baseley Associates  
Iceni Projects Limited  
ID Planning  
IDAS  
Indigo Planning

Indigo Planning Ltd  
J Liversidge & Sons  
Jacks Coffee Shop  
James Downes Chartered Architect  
Jan Molyneux Planning  
Jennifer Hubbard Planning Consultant  
Job Centre Plus  
John Howlett Planning  
Johnson Brook  
Jones Lang LaSalle (LaSalle UK Ventures  
Property)  
Jones Lang LaSalle (LaSalle UK Ventures  
Property)  
Joseph Rowntree Foundation  
JWPC Limited  
JWPC Ltd  
KCS Development Ltd  
Kember Loudon Williams Ltd  
Kentmere House Gallery  
Keogh Planning  
Kexby Parish Council  
Kexby Parish Council  
KeyLand Developments Ltd  
King Sturge  
Kirkwells  
Knapton Lane Residents Association  
Knight Frank  
Kyle & Upper Ouse Internal Drainage Board  
K yng Properties Ltd  
La Salle UK Ventures  
Lambert Smith Hampton  
Land Securities Plc  
Land Securities Properties Ltd  
Landmark Developments  
Landmatch Ltd  
Lands Improvement  
Langleys  
Laverack Associates Architects  
LDP Planning  
LEAF  
Leeds City Council  
Leeman Road Community Association  
Leeman Road Millennium Green Trust  
Leeman Stores  
Lidgett Grove Scout Group  
Lifeline  
Lifelong Learning Partnership  
Lillings Ambo Parish Council  
Linden Homes  
Linden Homes & Escrick Park Estate  
Linden Homes North & Miller Homes

Linden Homes Strategic Land  
Lindsey Residents Association  
Lindum York  
Linton On Ouse & Shipton By Beningbrough  
Parish Councils  
Lions Club  
Lister Haigh Ltd  
Little Acorns, New Earswick  
Lives Unlimited  
Local Government Yorkshire and Humber  
Long Marston Parish Council  
Longhurst and Havelok Homes  
Loxley Homes  
LXB Properties Ltd  
Marks & Spencer plc  
Marsden Homes Ltd  
Matbo Limited  
McArthur Glen Designer Outlet  
McCarthy & Stone Retirement Lifestyles Ltd  
McKechnie Plastic Components  
Meadlands Area Residents Association  
Melrose PLC  
Mental Health Forum  
Metro  
Micklegate Planning Panel  
Miller Homes  
MIND  
Mineral Products Association  
Minsters Rail Campaign  
Minsters Rail Campaign  
Mitchells & Butlers PLC  
MM Planning  
Module Partitions  
Module Partitions  
Monks Cross North Consortium  
Monks Cross Shopping Centre  
Monks Cross Shopping Park Trust  
Moor Monkton Parish Council  
Moorside Developments Ltd  
Mudd & Co  
Mulberry Hall  
Muncaster Residents Association  
Murton Parish Council  
Naburn Parish Council  
NAM (Nature after Minerals)  
Nathaniel Lichfield & Partners  
National Centre of Early Music  
National Farmers Union  
National Federation of Bus Users  
National Grid  
National Grid Property Ltd

National Offender Management Service  
National Rail Supplies Ltd  
National Railway Museum  
National Trust  
Natural England  
Navigation Residents Association  
Nether Poppleton Parish Council  
Nether Poppleton Parish Council  
Network Rail  
New Earswick Parish Council  
Newsquest (York) Ltd  
Newton on Derwent Parish Council  
NFU North East  
NHS  
Niche Design Architects  
Nixon Homes  
NJL Consulting  
NMSI Planning & Development Unit  
North Yorkshire & York PCT  
North Yorkshire County Council  
North Yorkshire County Council Business &  
Environmental Services  
North Yorkshire Forum for Voluntary  
Organisations  
North Yorkshire Police  
North Yorkshire Police Authority  
NorthCountry Homes Group Ltd  
Northern Gas Networks  
Northern Rail  
Northminster Developments Ltd  
Northminster Ltd  
Northminster Properties Ltd  
Novus Investments Ltd  
Npower Renewables  
NTR Planning  
O'Neill Associates  
Oakgate Group PLC  
Office of Government Commerce  
Office of Rail and Road  
Older Citizens Advocacy York  
Older People's Assembly  
O'Neil, Beechey, O'Neil Architects  
O'Neill Associates  
Opus Land Ltd  
Osbalwick Parish Council  
Osbalwick Parish Council & Meadlands Area  
Residents Association  
Ove Arup & Partners Ltd  
Overton Parish Council  
P & O Estates  
Park Grove Residents Association

Passenger Transport Network  
Paul White Ltd  
PB Planning  
Peacock & Smith Ltd  
Peacock and Smith  
Peel Environmental Management (UK) Ltd &  
North Selby Mine Waste Management Ltd  
Peel Environments Ltd  
Pegasus Group  
Performing Live Arts York (PLAY)  
Persimmon Homes  
Persimmon Homes (Yorkshire)  
Persimmon PLC  
Philip Parker Planning Services Ltd  
Piccadilly Autos  
Pike Hills Golf Club  
Pilcher Homes Ltd  
Pilkington Group Limited  
Pioneer  
PLACE/Yorkshire Wildlife Trust  
Places for People  
Planinfo Research Team  
Planning Potential  
Planning Prospects Ltd  
Planware Ltd  
Plot of Gold Ltd  
Pocklington and Wolds Gateway Partnership  
Pocklington and Wolds Gateway Partnership  
Polly Anna's Nursery  
Poppleton Garden Centre  
Poppleton Junior Football Club  
Poppleton Road Memorial Hall  
Poppleton Road Primary School  
Poppleton Ward Residents Association  
Portakabin Limited  
Potts Parry & Ives Chartered Architects  
Powergen Retail Ltd  
Preliminary Planning Professionals Limited  
Pre-School Learning Alliance  
Probation Service  
Ptarmigan Land Ltd  
Purey Cust Nuffield Hospital  
Quod  
R S Cockerill (York) Ltd  
R Thompson & Son  
RA&QS Committee Of The Governing Body Of  
Woodthorpe Community Primary School  
Railway Heritage Trust  
Railway Heritage Trust  
Railway Housing Association  
Ralph Butterfield Primary School  
Ramblers Association (York Group)  
Rapita Systems  
Rapleys LLP  
Rawcliffe Parish Council  
Raymond Barnes Town Planning Consultant  
Redrow Homes  
Redrow Homes (North) Ltd  
REIT  
RenewableUK  
rg+p Ltd  
Richard Baxter Planning Consultant  
Richmond Fellowship  
River Foss Society  
Road Haulage Association  
Rolawn Ltd  
Rollinson Planning Consultancy  
Royal Institute of Chartered Surveyors  
Royal Mail Group Legal (Real Estate)  
Royal Mail Group Ltd  
Royal Masonic Benevolent Institution (RMBI)  
RPS Planning & Development  
RSPB  
RTPI Yorkshire  
Rufforth with Knapton Parish Council  
Rural Action Yorkshire  
Rural Solutions  
Rushbond Group  
Ryedale District Council  
S Harrison Developments Ltd  
Safe and Sound Homes  
Safer York Partnership  
Safer York Partnership  
Sainsbury's Supermarket Ltd  
Salvation Army  
Sandalwood Gates & Timber Products  
Sanderson Weatherall  
Sanderson Weatherall LLP  
Sandringham Residents Association  
Save Acomb Moor Campaign  
Savills  
SBO Lands  
Scarcroft Residents Association  
Science City York  
Scott Wilson  
Scottish Power  
Scotts Property Ltd  
Selby District Council  
Shepherd Group Properties Limited  
Shepherd Construction  
Shepherd Design Group  
Shepherd Engineering Services Ltd

Shepherd Group Properties Ltd  
Shepherd Homes  
Sheriff Hutton Parish Council  
Shirethorn Ltd  
Showmans Guild of Great Britain  
Siemens Transportation Systems  
Signet Planning  
Signet Planning Ltd  
Simpson York Ltd  
Skelton Consultancy  
Skelton Parish Council  
Skelton Village Action Group  
Skelton Village Trust  
Smith & Ball LLP  
Smiths Gore  
Society for the Preservation of Ancient Buildings  
Spawforth Associates  
Speedy Wine  
Sport England  
Sporting Knavesmire  
Spurriergate Centre  
SSA Planning Ltd  
St Georges Place Residents Association  
St Leonard's Hospice  
St Mark's Church Rawcliffe  
St Mary's Parochial Church Council  
St Paul's Square Residents Association  
St Peter's School  
St Sampson's Centre  
Staff & Residents Of Dunnington Lodge Nursing Home  
Stamford Bridge Parish Council  
Starbucks Coffee Company  
Stephen Ward Town Planning & Development Consultants Ltd.  
Stephenson & Son  
Stephenson & Son  
Stephensons  
Stillingfleet Parish Council  
Stockholme Environment Institute  
Stockton on the Forest Parish Council  
Stone Soup  
Storeys Edward Symmons  
Storeys:ssp Ltd  
Strathmore Estates  
Stratus Environmental Limited  
Strensall Conservation Group  
Strensall with Towthorpe Parish Council  
Sunshine Day Nursery (York) Ltd  
Supersave Ltd

Sustrans  
Sutton on the Forest Parish Council  
Sutton upon Derwent Parish Council  
SW Law Solicitors  
SWLaw Solicitors Limited (incorporating Eric Cowsill Solicitors)  
T H Hobson Ltd  
Tang Hall and Heworth Residents  
Tangent Properties  
Tangerine  
Taylor Wimpey  
Taylor Wimpey UK Ltd & Linden Homes  
Taylor Wimpey, Barratt/David Wilson Homes & T W Fields  
Taylor Wimpey, Linden Homes & The Grimston Bar Development Consortium  
Tees Valley Housing Group aka FABRIK  
Tenet Group LTD  
Terence O'Rourke  
Terence O'Rourke Ltd  
Tesco Stores Limited  
Tetlow King Planning  
TEV Ltd  
The Castle Area Campaign Group  
The Coal Authority Planning & Local Authority Liaison Department  
The College of Law  
The Co-operative Group  
The Ellis Family & Skelwith Group  
The Garden Centre Group  
The General Store  
The Georgian Group  
The Helmsley Group Ltd  
The Inland Waterways Association Ouse-Ure Corridor Section  
The JTS Partnership  
The Knapton & West York Green Belt Protection Group  
The Land and Development Practice  
The Landowners Consortium  
The Lawn Tennis Association  
The Lindum Group  
The Merchant Taylors Of York & R & M Gorwood  
The Minster Veterinary Practice  
The Moor Lane Consortium  
The National Federation of Gypsy Liaison Groups  
The National Federation of Gypsy Liaison Groups  
The Planning & Design Partnership

The Planning & Design Partnership  
The Planning Bureau Limited  
The Retreat Ltd  
The River Foss Society  
The Showmen's Guild of Great Britain  
The Theatres Trust  
The Trustees Of The Richardson & Penty Families  
The War Memorial Trust  
The Wendy House Children's Day Nursery  
The Wilberforce Trust  
Theatre Royal  
Thirteen Group, Southdale Homes Ltd & Strata Homes Ltd  
Thorganby Parish Council  
Three  
Tiger Developments  
Tilstons Newsagents  
Top Line Travel of York Ltd  
Tower Estates (York) Ltd  
Travellers Trust  
Trustees Of Miss Beverley & The Jeffrey Family  
Trustees of Mrs G M Ward Trust  
Trustees Of W Bridge  
Tullivers  
Turley  
Turley Associates  
Turnberry Planning Limited  
TW Fields  
United Utilities Operations Limited  
University of York  
Upper Poppleton Parish Council  
USS  
Vale of York Clinical Commissioning Group  
VALLI LLP  
Vangarde  
Vernon and Co  
Victorian Society  
Visit York  
Vodafone and O2  
Voluntary Sector Forum for Learning Difficulties  
W A Fairhurst & Partners  
W M Birch & Sons Ltd  
W M Thompson (York Ltd)  
Waites & Moorey Chartered Architects & Surveyors  
Walker Morris LLP  
Walmgate Community Association  
Walmgate Day Nursery Ltd  
Walton & Co  
Ward Associates  
Ward Associates Planning Consultants  
Ward Associates Planning Consultants  
Ward Hadaway Solicitors  
Ware and Kay LLP  
Warman Homes Ltd  
Warthill Parish Council  
Water Lane Ltd  
Welcome to Yorkshire  
Westfield Lodge Ltd & Crackmount Investments Ltd  
Westgate Apartments  
Wheatlands Community Woodland  
Wheldrake Parish Council  
White Young Green Planning  
Whitkirk Investments Ltd  
Wigginton Parish Council  
William Birch & Sons  
Willow Grove Residents' Association  
Wimpey Homes  
Without Walls (York Economic Partnership Board)  
WM Morrison Supermarkets PLC  
World Heritage Working Group  
WR Dunn & Co. Ltd.  
Wyevale Garden Centres  
WYG  
Yacro  
Yew Tree Associates  
York & Ainsty Hunt  
York & District Citizens Advice Bureau  
York & District Trade Council  
York & North Yorkshire Chamber of Commerce  
York & North Yorkshire Partnership Unit  
York (Trenchard) Residents Company Ltd  
York Access Group  
York Ainsty Rotary Club  
York and District Trades Union Council  
York Arc Light  
York Archaeological and Yorkshire Architectural Society  
York Archaeological Forum  
York Archaeological Trust  
York Autoport Garage  
York Blind & Partially Sighted Society  
York Bridge Club  
York Business Park Developments Ltd  
York Carers Together  
York Church of England Parishes

York City Centre Churches  
York City Centre Ministry Team/York  
Workplace Chaplaincy/One Voice  
York City Centre Partnership Ltd  
York Civic Trust  
York Coalition of Disabled People  
York College  
York Conservation Trust  
York Consortium of Drainage Boards  
York Council for Voluntary Service  
York Council for Voluntary Service  
York Cycle Campaign  
York Cycle Show Committee  
York Deanery Synod  
York Designer Outlet  
York Diocesan Board of Finance  
York Diocesan Office  
York District Sports Federation  
York Environment Forum  
York Environment Forum (Natural  
Environment Sub Group) & Tremendous York  
York Georgian Society  
York Gliding Centre Ltd  
York Green Party  
York Guild of Building  
York Health Services NHS Acute Trust  
York Hospitality Association  
York Hospitals NHS Foundation Trust  
York Housing Association  
York in Transition  
York Independant Living Network  
York Lakeside Lodges  
York Land Yacht Club  
York Marina  
York Merchant Adventurers Company  
York Microlight Centre  
York Minstermen  
York Mosque  
York Museums Trust  
York Natural Environment Panel  
York Natural Environment Trust  
York Navigator Ltd  
York Open Planning Forum  
York Ornithological Club  
York Ornithological Club  
York People First 2000  
York Practice Based Commissioning Group  
York Professional Initiative  
York Professionals  
York Racecourse Committee  
York Racial Equality Network

York Railway Institute  
York Residential Landlords Association  
York Residents` Federation  
York St John University  
York Teaching Hospital NHS Foundation Trust  
York Tomorrow  
York Tourism Strategy Steering Group  
York Travellers Trust  
York TV  
York Youth Council  
York@Large  
York-Heworth Congregation of Jehovah's  
Witnesses  
Yorkshire & The Humber Strategic Health  
Authority  
Yorkshire Air Museum  
Yorkshire Ambulance Service  
Yorkshire Architectural and York  
Archaeological Society  
Yorkshire Business Pride (City Centre  
Partnership)  
Yorkshire Coastliner  
Yorkshire Energy Partnership  
Yorkshire Footpath Trust  
Yorkshire Housing  
Yorkshire Housing Group  
Yorkshire Inland Branch of British Holiday &  
Home Parks Association  
Yorkshire MESMAC  
Yorkshire Naturalists Union  
Yorkshire Philosophical Society  
Yorkshire Water  
Yorkshire Wildlife Trust  
Yorkstories.co.uk  
YorSpace  
Yorvale Projects LLP & Maple Grove  
Developments Ltd  
Yorvik Homes  
Yorwaste Ltd  
Youth Forum  
Youth Service - V & I Coordinator

**Names of Individuals are not included for  
Data Protection Reasons**