

Annex B:

Responses received on the Core Strategy Issues and
Options 2 Consultation (September – October 2007).

1. Vision

1.1 The following comments were received in relation to developing the Core Strategy vision and spatial planning objectives.

General Comments

1.2 An overall comment in relation to the vision section suggested that it is important that the origin of all the spatial planning objectives are clearly identified. It was also highlighted that reducing York's Eco-footprint should be part of the vision rather than an individual objective. The inclusion of the aims of the Future York report received some support including from Yorkshire Forward who suggested that the relevant elements of the report are included in the vision and the spatial objectives of the Core Strategy.

1.3 In relation to comments received on the spatial planning objectives Yorkshire Forward indicated that an additional objective supporting development and expansion of a sustainable central business district and Science City York, bringing forward strategic sites, and highlighting the importance of financial and professional industries should be included. It was also suggested by some respondents that most objectives are not objectives, but 'givens' which should form the basis of the vision such as RSS requirements.

1.4 The following sets out comments received on the proposed objectives:

Objective 1

It was suggested that this objective should be expanded to define what the term 'sustainable' means. It was also thought that reference should be made to prioritising local supply chains and local small business. It was also questioned whether this should be a primary objective for York.

Objective 2

It was highlighted that within objective 2 there should be a reference to smaller specialist shops.

Objective 3

It was indicated that Green Tourism should be fully integrated in our approach and should not just be included as an add on.

Objective 5

English Heritage recommended that objective 5 should also include specific reference to ensuring that new development reinforces local distinctiveness. It was also highlighted that there should be an additional reference to sustainable construction.

Objective 7

It was suggested that objective 7 should better relate to PPG2 and emerging RSS in relation to the creation of a permanent Green Belt for York that preserves its special character and setting, whilst providing for adequate levels of development over its life and ensuring sustainable development patterns. It was also suggested by a respondent that the words 'whilst ensuring sustainable development' should be deleted from the objective.

- 1.10 **Objective 10**
It was indicated that this should be expanded to refer to the need to respond to the climate change agenda.
- 1.11 **Objective 12**
It was felt that the second part of this objective ‘...whilst contributing to meeting the RSS requirements’ should be deleted, because minerals applications should be judged relating to local measures and not on whether it meets RSS requirements for minerals.
- 1.12 **Objective 14**
It was suggested that the following part of Objective 14 ‘...and to meet the RSS requirements’ should also be deleted because the RSS will essentially give any final figures in relation to housing.
- 1.13 **Objective 15**
A recommended wording change was highlighted for this objective which included to protect existing open space and community facilities. It was also suggested by a respondent that green space should be protected for its intrinsic wildlife, conservation, and local amenity value, not for formal recreation purposes.
- 1.14 **Objective 16**
It was suggested that this objective needs to be amended as it responds to two separate and distinct issues: that of York’s training needs and separately the role of HE establishments in the city.
- 1.15 **Objective 17**
It was highlighted that this objective should refer to high quality health facilities being provided across the city, which are accessible to residents.

Key Issue Comments

- 1.16 The following sets out a summary of the responses in relation to the options posed for the vision and strategic spatial objectives:

Key Issue 1a: LDF vision

- 1.17 A clear majority of those who responded supported option 2. This option indicated that to create the vision for the LDF the Community Strategy vision together with other planning issues should be adopted in order to create a unique LDF vision. In doing so it should have sustainable development at its heart.
- 1.18 Of those who supported option 3, which was to combine the Community Strategy vision and the views of the Future York Group the aspiration for economic growth was paramount. It was also suggested that Future York was more consistent with emerging RSS and the role of the Leeds City Region.

Key Issue 1b: Delivering the LDF vision

- 1.19 Of those who responded, the following objectives were generally considered priorities:

- Objective 1 York's economic role
Objective 2 York's sub-regional retail role
Objective 4 Recognising and preserving York's historic and special character
Objective 7 Creating a permanent green belt
Objective 8 Protecting biodiversity
Objective 14 Delivering an appropriate mix and type of housing to meet York's needs

2. Spatial Strategy

- 2.1 This section includes comments that were received in response to the LDF Spatial Strategy.

General Comments

- 2.2 While comments were broadly supportive of the description of the settlement hierarchy included within the options for Key Issue 2A, it was felt that the hierarchy should be quantified in terms of proportion or number of homes/ha of employment. Several respondents noted that the spatial strategy has not yet set out broad locations for growth, and that this is a key requirement from guidance in producing a sound spatial strategy. Several comments related to the need to reflect the latest RSS position (in particular GOYH and the Regional Assembly).

Key Issue Comments

- 2.3 The following sets out a summary of the main findings in relation to the options posed for the spatial strategy chapter :

Key Issue 2A – broad influences on the spatial strategy

- 2.4 In considering broad locations for future growth, the majority of responses generally supported prioritising locations within or adjacent to York's main urban area in preference to further expansion of villages. Where comments were made in relation to growth within villages, Haxby and Dunnington were considered to offer the best opportunities to accommodate growth, given the relatively good access to jobs and services

- 2.5 Some alternatives to the reported issues of apportioning growth were suggested: It was suggested that the RSS allows open market housing to be developed in rural communities to meet locally identified need, and that the hierarchy should be reworded to reflect this. Some felt consideration should be given to an urban extension as an alternative to village expansion since growth may be preferable on certain Greenfield sites and as part of selective urban extensions provided they meet sustainability objectives and support an identified need for development. One respondent thought that further strategic options based on safeguarding environmental assets should be posed.

Key issue 2B – detailed influences on the spatial strategy

- 2.6 While preserving the historic character and setting of York was considered by most to be the primary detailed influence on the spatial strategy, GOYH and the Environment Agency felt all the listed influences should be used to inform the strategy. These influences include:
- Preserving the historic character and setting of York;
 - Nature conservation;

- Flood risk;
- Commuting;
- Congestion;
- City and district centres;
- Major developed sites and opportunities.

Reference was made to RSS Policy Y1 (Part E1) as setting out the appropriate balance: - *“Focus most development on the Sub Regional City of York, whilst safeguarding its historic character and environmental capacity”*.

Key Issue 2C – other suggested detailed influences

- 2.7 A number of alternative influences on the spatial strategy were suggested:
- the need to prioritise brownfield or previously developed land over greenfield sites;
 - consideration should be given to the influence of growth patterns in neighbouring authorities (e.g. at Escrick) which could inform our own spatial strategy;
 - the need to protect and enhance local communities and neighbourhoods by supporting local services;
 - the deliverability of sites;
 - it was felt that the green belt is not the only means by which to protect the character and setting of York, and that a better understanding is needed of the impact which development will have on the historic environment of the city; and
 - one respondent noted that commute patterns should also take into account the means of transport., as public transport accessibility should be a positive influence.
- 2.8 Natural England set out a number of principles which they suggested should be used to guide development:
- ensure new development is well related to the landform, natural systems and processes; landscape setting and characteristic scale; form, materials and detailing of the settlement;
 - draw appropriate development boundaries, reflecting the character of the settlement and needs for development;
 - provide for appropriate new development to be within, or where necessary on the edge of settlements;
 - recognise that open space within settlements can be as important as spaces around their periphery, in terms of character and community value;
 - encourage development to enhance local distinctiveness and contribute to a sense of place; and
 - dovetail with public transport accessibility and maximise opportunities for walking and cycling.

3. Housing and Employment Growth

- 3.1 The following comments were received in relation to developing the Core Strategy Housing and Employment Growth chapter.

General comments

- 3.2 It was argued that some Greenfield sites may be preferable to brownfield in sustainability terms, for both housing and employment sites, where they perform well in terms of sustainability.
- 3.3 There was recognition of the role of the York Northwest site as a high quality location providing for future employment growth.

Key Issue Comments

- 3.4 The following sets out a summary of the main findings in relation to the options posed for the housing and employment growth chapter.

Key Issue 3A – the lifespan of York’s Green Belt

- 3.5 Most respondents felt that the LDF should reflect the revised RSS timescale to accommodate growth beyond 2026, and that even 2029 is unlikely to be sufficiently long term. It was suggested that we should consider 25 years as a minimum, but more reasonably 30 years. This approach was supported by the Government Office for Yorkshire and the Humber.
- 3.6 English Heritage noted that to be able to define a Green Belt, which fulfils its primary purpose, an assessment needs to be undertaken of what capacity the historic city has to accommodate further growth. To imply that the Local Development Framework will identify sufficient land to meet the development needs of the City and then define Green Belt boundaries would be incompatible with the need to safeguard the special character and setting of the historic city.

Key Issue 3B – provision for housing growth

- 3.7 The majority of responses noted that the Core Strategy should reflect the RSS in relation to housing numbers (including GOYH, Regional Assembly), however some felt the higher Housing Market Assessment figure (982/annum) represented a figure closer to providing a robust future mix/affordability level for York. A small minority felt that a figure around 630 dwellings/annum would better reflect the environmental capacity of the city.
- 3.8 It was suggested that in relation to windfall figures- PPS3 specifically states that windfall allowance should not be included in the first 10 years of land supply unless LPAs can provide robust evidence of genuine local circumstances.

Key Issue 3C – future housing densities

- 3.9 Some felt that defining densities in broad areas of the city is reasonable/useful; others that it would be more appropriate to recommend a range of densities in different localities/sites - possibly just to set minimum densities within general locations rather than upper limits.

- 3.10 It was suggested that development densities in the city centre should not be replicated out-of-centre, and that a broader mix of housing types should be provided. Particular reference was made to the role of family housing with private garden space. A respondent questioned whether an option considering a minimum density limit of 15 dph was valid given PPS3 context.

Key Issue 3D – levels of employment growth

- 3.11 While it was recognised that the RSS would contain figures on future employment growth, several responses put more weight on the figures expressed in the emerging Employment Land Review. The Regional Assembly noted that the Core Strategy needs to identify which major projects it is able to support and make provision accordingly, and that there should be a significant bank of employment land to facilitate choice, movement and “churn” in the market.

Key Issue 3E – the changing nature of York’s economy

- 3.12 There was no clear steer on any one aspect of York’s economy, rather a general suggestion for the need to support all aspects of it.

Key Issue 3F – options to guide employment site identification

- 3.13 Broadly, respondents supported making use of brownfield land and promoting a hierarchy of locations, with priority for city and district centres before considering other options. Of the other options posed, it was felt that proximity to the University need not be a primary influence for all types of employment use.

Key Issue 3G – interrelationship between housing and employment growth

- 3.14 York was recognised as being a strong net importer of commuters and it was felt that the trend is likely to continue. Those who supported option 1 (to match employment and housing growth within York) felt that this would better reflect the RSS position. Those who supported option 2 (accommodating some employment driven housing growth outside of York) argued that since other areas such as Malton & Norton have excellent public transport links to York (bus and rail), part of the role of York should be to support the principal towns in the York sub-area.
- 3.15 English Heritage commented that the strategic objective should be to bring the levels of employment and the levels of housing in the city (including sufficient affordable housing) as close to each other as possible within the capacity limits of the City of York as identified in an environmental capacity study.
- 3.16 As part of the proposed Central Business District it was felt that the York NW site could, and should, provide significant amounts of housing in close proximity to new employment growth.

Section 4: Housing mix and type

- 4.1 The following comments were received in relation to developing the Core Strategy housing mix and type chapter.

Key Issue Comments

- 4.2 The following sets out a summary of the main findings in relation to the options posed for the housing mix and type chapter:

Key Issues 4A, 4B and 4C – approach to affordable housing

- 4.3 There were a few queries raised regarding the extent to which the Housing Market Assessment could support continuing the Local Plan's policy approach to affordable housing (50% on certain sites). Most respondents felt that the level of affordable housing should be reduced to a target closer to the RSS target of 40%, which would also be more consistent with neighbouring authorities, but that the threshold could be reduced below 15 dwellings/0.3 ha. Government Office for Yorkshire and the Humber indicated that local authorities can set lower thresholds where viable and practical, including in rural areas.
- 4.4 In terms of the approach to delivering affordable housing, most respondents supported a mix of social rented and discount for sale, some with the proviso that the precise balance between social rented and "discount for sale" housing should be a matter for negotiation on individual sites. GOYH noted that policy wording should reflect the definition of affordable housing in PPS3 paragraphs 27 to 30, which does not include low cost market housing.
- 4.5 The vast majority of responses supported the provision of more family accommodation, although it was suggested that some sites may be less suited to family accommodation and should form less of a priority for accommodating growth.
- 4.6 Comments reinforced the need to provide additional Gypsy and Traveller pitches in York to help address need identified at the North Yorkshire level (GOYH/Regional Assembly).
- 4.7 Several comments held that the University should be required to provide further housing on campus – it was noted that student housing does not currently trigger the affordable housing policy and at least some contribution should be required. In addition it was suggested that some sites be designated solely for student housing.

Section 5: The role of retail and leisure

- 5.1 The following comments were received in relation to developing the retail and leisure element of the Core Strategy.

General Comments

- 5.2 It was felt that further consideration should be given to develop the city's offer not just in terms of leisure facilities like cinemas, but also in terms of its public spaces, the way they are animated, and the way that residents can use, move about, and experience the city.
- 5.3 There were a couple of comments relating to the way in which existing retail centres were described. One respondent felt that descriptions of the two out of centre destinations could be improved. Particularly that Monks Cross's leisure facilities are unrecognised and the status of

Clifton Moor is underplayed (Phases 1-3). Another queried the omission of both Selby & Tadcaster as shopping centres.

Key Issue Comments

- 5.4 The following sets out a summary of the main responses in relation to the options posed for the role of retail and leisure.

5A – level of future retail provision

- 5.5 There was an even balance of responses regarding if York should increase its share of the regional retail market. Those who felt York should hold onto its current regional share were of the view that York should not try to emulate Leeds or Hull but build on its own attributes of small spaces for small scale businesses and retail premises.

5B – key areas of retail growth

- 5.6 Both Government Office for Yorkshire and the Humber and the Yorkshire and Humber Assembly, and the Highways Agency noted that the proposed changes to RSS Policy YH5 states that Regional Cities and Sub Regional Cities and Towns, including the City of York, should be the prime focus for shopping and other town centre uses. Also that there is an identified lower order service centres in York where significant local level shopping development is acceptable.
- 5.7 The majority of responses supported option 2 – to direct growth to York’s city centre and district centres, and to also recognise the opportunities generated by major development opportunities, such as York Northwest – although there were also a minority of responses supporting the designation of Monks Cross and Clifton Moor as district centres.

6. Design and Construction

- 6.1 This section reflects the comments given regarding the design and construction chapter of the Core Strategy.

General Comments

- 6.2 An overarching comment suggested that there is a need to have a clear understanding of the existing character of York, not just within the historic core, but looking at the City as a whole.
- 6.3 In terms of energy, Yorkshire Forward highlighted how the LDF would need to contribute towards achieving the energy efficiency targets outlined within the Housing Green Paper. Natural England considered that the Core Strategy should set out different forms of renewable energy and include a full range of planning policy criteria to ensure robust assessment of proposed development sites.

Key Issue Comments

6.4 The following sets out a summary of the main findings in relation to the options posed for the design and construction section:

Key Issue 6.a - city-wide design principles

6.5 The majority of respondents supported Option 2 which favoured using CABE principles but supplementing these with other standards, for example by including principles which are specific to York.

Key Issue 6.b - Code for Sustainable Homes (residential) and BREEAM (non residential) assessment.

6.6 The majority of respondents supported Option 3 which stated that all development sites should be covered by the required standards.

Key issue 6.c - on site renewable energy generation.

6.7 The majority of people that responded supported both Option 1 which refers to all sites meeting the 10% target and Option 3 which refers to an alternative approach for building in conservation areas and listed buildings.

Key issue 6.d stand-alone renewable energy generators

6.8 This option gained a mixed response from respondents. It was highlighted by some respondents that the forms of renewable energy generation listed should not be given equal weight. In terms of the 'impact criteria' the following responses were gained:

- need to consider impact on species of nature conservation importance;
- need to promote on-shore and offshore wind generation to meet targets; and
- need to state that there will be a presumption in favour of granting planning permission for wind turbines in the Green Belt.

6.9 In the case of on-site renewables a requirement for 10% up to 2012 rising to 15% by 2015 and 20% by 2020 was suggested. It was also highlighted that the Core Strategy should take account of the actions identified in the Regional Energy Infrastructure Strategy and should identify those broad locations where renewable energy developments would be promoted / acceptable.

7. Open space and built sports facilities

7.1 The following comments were received in relation to the Core Strategy open space and built sports facilities chapter.

General Comments

7.2 Natural England recommended that this section should refer to Green Infrastructure and they suggested the following definition: *"Green Infrastructure is the physical environment within and between our cities, towns and villages. It is the network of open green spaces, waterways, gardens, woodlands, green corridors, trees and open countryside that brings many social, economic and environmental benefits to local people and communities."*

7.3 Natural England also suggest that policy topics in the Core Strategy and subsequent Development Policies DPD should cover the provision, protection and enhancement of green infrastructure including public open spaces, green wedges and links, wildlife corridors and stepping-stones should be produced. Adding to this Natural England highlight that the Council should also consider producing and adopting Supplementary Planning Documents on the inclusion of green infrastructure/adoption of green space standards in new development and using landscape character to underpin and guide decisions on development.

7.4 One respondent suggested it was also felt that a requirement of the LDF should be for large development sites of over 200 homes to provide allotment space.

Key Issue Comments

7.5 The following sets out a summary of the main findings in relation to the options posed for the open space and built sports facilities section:

Key Issue 7.a open space provision standards

7.6 The majority of respondents favoured option 4 which stated that the quality, quantity and accessibility of open space type should be considered equally important.

Key Issue 7.b types of open space

7.7 The responses to this question mainly favoured i) however in relation to ii) it was suggested that there should be stronger protection than at present for the following:

- small open spaces such as large back gardens.
- Areas which have no formal designation, but which provide local amenity value
- Non-public open space with high amenity value
- Woodland

Key Issues 7.c –built sporting facilities

7.8 There was minority support for delivering facilities identified by Sports and Active Leisure Strategy, namely:

- indoor flexible multi sports space (equating to 24 badminton courts)
- public swimming space (equating to 12x25m lanes of pool space)
- an artificial turf competition hockey facility; and
- a professional sports stadium catering for community sports development

8. Educational Facilities

8.1 This section reflects the comments given regarding the educational facilities chapter of the Core Strategy.

General Comments

8.2 Network Rail and the National Museum of Science and Industry in their response specifically highlighted that in the context of York Northwest account needs to be taken of school need arising from increased residential development in this locality.

Key Issue Comments

8.3 The following sets out a summary of the main findings in relation to the options posed for the educational facilities section.

Key Issue 8.a - new schools

8.4 All respondents to this key issue favoured option 1 which highlighted that new school sites should be provided where a need has been identified. The Highways Agency added to this by suggesting that that schools should be provided in sustainable locations with good transport links to reduce the impact on the Strategic Road Network (SRN).

Key Issue 8.b - further and higher educational establishments

8.5 The responses to this key issue varied greatly however the majority indicated that student housing should be provided in line with the expansion of student numbers. Osbaldwick Parish Council suggested that promoting access to sporting, cultural and social facilities connected to the educational establishment and maintaining or enhancing the parkland setting, views and ecology of the campuses should underpin the LDF policy approach. The Highways Agency suggested that that higher educational establishments should be provided in sustainable locations with good transport links to reduce the impact on the Strategic Road Network (SRN).

9. Health facilities

9.1 This section reflects the comments given regarding the health facilities chapter of the Core Strategy.

Key Issue Comments

9.2 The following sets out a summary of the main findings in relation to the options posed for the health facilities section.

Key Issue 9.a healthcare facilities

- 9.3 This issues considered the criteria for locating new health facilities in the city, and asked whether these should be small scale, and located close to where people live, or larger scale and located more centrally. No option was clearly favoured however several general comments in relation to this Key Issue were made. Of those who commented the need to find a new site for the District Hospital was highlighted, which will be required within the lifetime of the LDF. It was also suggested that there is a need for additional health facilities to support major development sites.

10. Historic Environment

- 10.1 The following comments were received in relation to the Core Strategy historic environment chapter.

General Comments

- 10.2 It was suggested that the historic environment will be at one and the same time, a prime driver and prime constraint in all future development. The same respondent also suggested that we should seek to address conservation and the use of the historic environment more seriously. For example it was pointed out that it should take as its starting point that York, on a national or even world scale is more or less universally regarded as a nice place to live, work or visit because of the ambiance and the civilised way of life provided by an exceptionally beautiful and homely but inspiring historic environment.

- 10.3 English Heritage indicated that the 2007 Heritage White Paper which supports development of local lists and/or the identification of locally important elements of the historic environment through development plan policies should be used as a key evidence base within the Core Strategy. English Heritage also maintain the need for an Environmental Capacity Study to underpin York's future growth.

Key Issue Comments

The following sets out a summary of the main findings in relation to the options posed for the historic environment section:

Key Issue 10.a - York's historic character

- 10.4 The majority of respondents favoured option 3 which stated that we should produce Local Lists, Village Design Statements and Parish Plans which recognise the special character of villages, neighbourhoods, sites and buildings regardless of whether they have formal Conservation Area or Listed Buildings status.

11. Natural Environment

11.1 This section reflects the comments given regarding the natural environment chapter of the Core Strategy.

General Comments

11.2 Natural England stated that there should be a commitment to develop a Local Biodiversity Action Plan and a policy in the Core Strategy to help deliver the Local Biodiversity Action Plan targets through the planning system, and that this should be linked to planning contributions where identified as appropriate. Natural England also said that the Core Strategy should allow for the provision of new sites of natural and semi-natural open space as well as safeguarding and enhancing existing areas.

11.3 Government Office for Yorkshire and the Humber highlighted that there are European nature conservation sites in the district. Whilst the LDF should not include specific policies for these sites, consideration should be given to the implications of the Habitat Directive 92/43/EEC, which is a European Council Directive on the conservation of natural habitats of wild flora and fauna.

11.4 The Environment Agency suggested that care should be taken not to try and prioritise landscape character over biodiversity.

Key Issue Comments

The following sets out a summary of the main findings in relation to the options posed for the natural environment section:

Key Issue 11.a protecting and enhancing York's natural environment

11.6 There was no option favoured overall, in fact several respondents suggested that all options should be implemented within the Core Strategy. These options included:

- formally recognising the role of locally valued nature conservation sites and species within management plans as well as those given statutory protection;
- identifying and protect valuable landscape and historic landscape areas;
- protecting and enhance the water course corridors and improve public access; and
- maintaining and increasing tree cover.

12. Transport and Accessibility

- 12.1 This section reflects the comments given regarding the transport and accessibility chapter of the Core Strategy.

General Comments

Transport and Accessibility

- 12.2 Ryedale District Council welcomed the proposed improvements of York's Transport links. They indicated that it is essential that a package of measures is implemented to improve public transport, including the ones highlighted within the Core Strategy document.
- 12.3 It was also highlighted that there is a need to emphasise the interrelationship between transport and air pollution more when developing policies.

Walking and Cycling

- 12.4 In relation to walking and cycling movements it was suggested that there is a need for a wider strategic approach to green space planning. This would include improved links between and access to the city's open spaces and recreation areas along with the wider countryside.
- 12.5 It was also highlighted that the approved transport hierarchy in York's Local Transport Plan should be integrated into the Core Strategy alongside the recognition of the significant modal share of walking and cycling in York.
- 12.6 It was felt that reference should be made to the Council's Cycling strategy, and the contribution that can be made to increasing cycling through 'safe routes to school' and secured covered cycle provision at school sites, and work places.

Overground Bus Network

- 12.7 Regarding the Overground network it was suggested that York should not have just one single interchange facility at the Train Station as it is not the best location for some routes, and that the Council needs to think about other interchange locations in the city centre.

Access York

- 12.8 Government Office for Yorkshire and the Humber state that there is a need for an integrated public transport interchange that is linked to the York Northwest site. They also suggested the importance of the Tram – Train scheme should be emphasised over motorised vehicles.
- 12.9 Some respondents suggested that demand management measure such as congestion charging should be considered and subject to public consultation.

Dualling Outer Ring Road

- 12.10 There were a small number of comments in response to means of reducing the impact of traffic by dualling the Outer Ring Road. Twice as many respondents were cautious of the proposal as were in support of it. The Government Office for Yorkshire and the Humber noted that funding limitations may render the scheme an aspiration rather than a reality, and the Yorkshire and Humber Assembly suggested that the dualling of the Outer Ring Road is not a regional priority and conflicts with proposed changes to RSS policy Y1. Ryedale District Council highlighted that enhancements to the Outer Ring Road must be matched by reduced capacity to traffic calming measures on routes towards the city centre.

Key Issue Comments

- 12.11 The following sets out a summary of the main findings in relation to the options posed for the transport section:

Key Issue 12.a LDF approach to transport issues

- 12.12 In relation to key issue 12.a the following options were posed:
- helping to deliver Local Transport Plan (LTP) measures;
 - including the proposed Tram-Train;
 - identifying improved rail facilities over and above those set out in LTP2;
 - identify future Park and Ride locations;
 - dualling the Outer Ring Road;
 - minimising car use in proposed new development;
 - implementing strict accessibility standards.

Both option 1 (helping to deliver the LTP) and Option 7 (implementing strict accessibility standards) were the most favoured approaches. The least favoured option however related to controlling car parking, which was option 6.

13. Waste and Minerals

- 13.1 This section reflects the comments given regarding the waste and minerals chapter of the Core Strategy.

Waste

General Comments

- 13.2 It was suggested that the Core Strategy should make a distinction between waste collection and downstream waste treatment.
- 13.3 The Environment Agency indicated that flood risk should be considered as a factor in the location of waste management facilities in accordance with PPS25.
- 13.4 It was highlighted that the Core Strategy should explain Harewood Whin and Hessay waste sites functions and highlight their role both now and in the future.

- 13.5 Government Office for Yorkshire and the Humber stated that PPS10 and the Waste Strategy for England 2007 require plans to identify specific sites for waste facilities or have sufficiently clear locational criteria that acceptable sites can be identified. The Core Strategy therefore needs to provide strategic level detail on waste to guide this process. This chapter needs to set out the preferred types of waste treatment facility and identify broad location(s) for them.
- 13.6 The Highways Agency stated that the impact waste movements could have on the Strategic Road Network (SRN) also needs to be highlighted. Any waste facilities should therefore be located to and reduce vehicle trips.
- 13.7 It was also suggested that the Core Strategy should encourage the use of developing existing waste plants rather than creating new ones.
- 13.8 It was highlighted that a standard set of criteria should not be applied to the location of all waste sites as it depends on what kind of waste site is being considered. In addition it was suggested that different policies should be developed for different phases of waste scenarios e.g. waste generation, waste collection and waste treatment.

Key Issue Comments

- 13.9 The following sets out a summary of the main findings in relation to the options posed for the waste section:

Key Issue 13.a – location of new waste facilities

- 13.10 The options posed considered different factors (environmental, operational and transport) and how they should be used in identifying future waste sites. There were a variety of different responses, however option 1 (avoiding environmentally sensitive areas e.g. SSSI's), option 2 (where environmental impact would be unacceptable e.g. noise dust, litter) and option 5 (which would be guided by the type of waste being dealt with e.g. industrial or household) were the most favoured options.
- 13.11 However respondents were concerned about the impact of locating waste facilities in the green belt, the potential types of technologies and how waste would be transported.

Minerals

General Comments

- 13.14 The Environment Agency stated that there should be an acknowledgement in this section of the relationship between redundant site restoration and flood storage. It should also be emphasised that maximum recycling of building waste and aggregates from all developments is required.
- 13.15 The Highways Agency stated that the impact mineral movements could have on the Strategic Road Network (SRN) also needs to be highlighted. Therefore any mineral facilities should be located in such a way to reduce vehicle trips, which means giving priority to the most sustainable sites.

Key Issue Comments

- 13.16 The following sets out a summary of the main findings in relation to the options posed for the minerals section:

Key Issue 13.b - the role of minerals

- 13.17 All respondents agreed that the exploration, appraisal, winning and working of sand and gravel should be permitted provided there is a demonstrable need and demand locally in the York area. However it has been suggested that this option is only suitable if it is made clear that there will be minimal impact on the surrounding area, natural environment and local communities.

14. Flood Risk and Development

- 14.1 This section reflects the comments given regarding the flood risk and development chapter of the Core Strategy.

General Comments

- 14.2 The Environment Agency stated that it needs to be made clear that the 'Sequential Test' should be carried out before undertaking an 'Exception Test', so that developments are directed to the lowest areas of flood risk first.
- 14.3 The Government Office for Yorkshire and the Humber highlighted that this chapter should reflect the approach set out in PPS25 and the RSS Policy ENV1 in relation to managing flood risk. It should refer to avoiding risk to people and managing flood risk elsewhere and highlight the positive effect this can have on sustainable communities.

Key Issue Comments

- 14.4 The following sets out a summary of the main findings in relation to the options posed for the flood risk and development sections.

Key Issue 14.a - flood risk and new development

- 14.5 The respondents views regarding wider sustainability issues should be balanced with flood risk where new development should be located in the future i.e. the use of 'The Exception Test' was evenly split. Option 1, which prioritises sustainable locations and which is more closely aligned to both PPS25 and RSS, was supported by half the respondents including the Yorkshire and Humber Assembly. The alternative option was to direct development to non high flood risk areas only.

Section 15: York's Green Belt

15.1 This section reflects the comments given regarding the green belt chapter of the Core Strategy.

General Comments

15.2 Several comments related to the detail of establishing a permanent Green Belt for York, such as: that existing previously developed sites close to the main urban area should be excluded from the Green Belt; local and strategic issues should be considered separately; no areas outside of the ring road should be considered as 'extensions of green wedges' as they won't fulfil the main purpose of York's Green Belt; areas of Green Belt bordering Conservation Areas should be given additional protection as they make a special contribution to preserving the historic setting of the City.

Key Issues Comments

15.3 The following sets out a summary of the main findings in relation to the options posed for the green belt sections.

Key Issue 15A – the primary purpose of York's Green Belt

15.4 GOYH support the continued protection of the Green Belt. Most comments note that in revising the boundary the LDF should identify land, which will under all circumstances remain open beyond the period of any statutory plan. Any adjustments required for housing or employment should be made for the *current* LDF, in accordance with the adopted principles.

15.5 Most respondents stated that the primary purpose of the Green Belt should be consistent with National Planning Policy Guidance, which states "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open". It was noted that the setting of York is vitally important and should be highlighted as such when considering the location and design of new development.

Key Issue 15B – characteristics of Green Belt

15.6 All factors (green wedges, areas that provide and impression of a historic city, and the setting of villages) were considered by most to be of equal value in preserving the special character of York.

16. Tourism

16.1 This section reflects the comments given regarding the tourism chapter of the Core Strategy.

General Comments

- 16.2 It was suggested that the Core Strategy should not distinguish between the cultural life of York as enjoyed by residents and the needs of tourists. In many ways they are one and the same. It should also seek to protect and enhance existing cultural and leisure facilities.
- 16.3 It was suggested by a respondent that the role of caravan parks in supporting local tourist economy should be recognised.
- 16.4 It was also highlighted by some respondents that 'Green Tourism' should underpin the future approach, not be identified as one of a range of priorities.

Key Issue Comments

- 16.5 The following sets out a summary of the main findings in relation to the options posed for the tourism section:

Key issue 16.a - tourism and York's economy

- 16.6 The majority of people that responded favoured the following: create better linkages between key attraction and sites, development of a new high quality hotel and establish a new visitor centre.
- 16.7 Other priorities put forward included improving the quality and availability of information about historic sites and improve provision of facilities for visitors e.g. toilets.