

Consultation statement

City of York

LDF

Local
Development
Framework

Core Strategy Preferred Options
Draft Consultation Statement
& Schedule of Responses
(2010)

Contents

Information on the Preferred Options Consultation

1.	Introduction	2
2.	Consultation Documents	2
3.	Document Distribution / Publicity	3
4.	Consultation Events	4
5.	Consultation Responses	5
6.	Response to 'Planning York's Future' Questionnaire	7
7.	Detailed Summaries of responses to the Main Document	46
8.	Summaries of the Conference Events	306

Annexes

Annex 1 – List of Consultees	343
Annex 2 – Planning York's Future Questionnaire	351
Annex 3 – Consultation Schedule	360

N.B. Individual comments in full can be viewed at the Council Offices at 9 St Leonard's Place. Please contact the Council on 01904 551466 for further information.

Information on the Preferred Options Consultation

1. Introduction

- 1.1 The main purpose of this document is to provide a summary of the responses received to the Core Strategy Preferred Options consultation, which the Council undertook in Summer 2009. The responses from this consultation will be used along with the Sustainability Appraisal and other emerging evidence base to produce a Submission draft Core Strategy.
- 1.2 The consultation commenced on 18th June 2009 and a series of publications and consultation techniques were used. These are detailed in sections 2 to 4 below. A key part of the consultation was a citywide leaflet questionnaire that was delivered to all York households. Consultation on the leaflet ran until the end of August 2009. In addition, workshops, exhibitions and meetings with key groups were held. Some of these were carried out in September and October to ensure that interested groups and individuals were not excluded. This was important as many organisations and interest groups did not meet during the summer months. The consultation deadline was also effectively extended.
- 1.3 This report outlines the different consultation documents that were produced; sets out who was consulted; outlines the methods and techniques used during the consultation, and summarises the issues raised in the responses received.

2. Consultation Documents

- 2.1 The following documents were made available as part of the consultation:
 - 'Planning York's Future' leaflet questionnaire;
 - Core Strategy Preferred Options document;
 - Core Strategy Preferred Options Sustainability Appraisal, technical appendices and non-technical summary;
 - Core Strategy Preferred Options Habitat Regulations Assessment;
 - Comments Form; and
 - Easy-Read Core Strategy summary.
- 2.2 Prior to consultation on the Preferred Options the document was subject to a Sustainability Appraisal. Sustainability Appraisal (SA) forms an integral part of the LDF and will be undertaken at key stages alongside the production of each Development Plan Document (DPD). The purpose of SA is to promote sustainable development through the better integration of sustainability considerations into policy development. The Sustainability Appraisal for the Core Strategy Preferred Options considers the key sustainability issues

arising from the proposed Core Strategy policies and objectives. This was published alongside the Preferred Options document.

2.3 There were several ways in which people and organisations could comment on the Preferred Options document. These were by:

- filling in the comments form;
- writing to the City Development team;
- emailing the City Development team;
- using the electronic comments form which could be found on the Council's website; or
- completing the 'Planning York's Future' leaflet questionnaire.

3. Document Distribution / Publicity

3.1 The packs were sent out to those of the 2600 contacts currently on the LDF database who indicated that they wished to be informed of the progression of the Core Strategy. A list of all those consulted is provided in Annex 1. Specific consultees received packs containing:

- Consultation letter;
- Core Strategy Preferred Options document;
- Sustainability Appraisal Non-Technical Summary;
- Leaflet questionnaire; and
- Comments Form.

All other contacts in Annex 1 received packs containing:

- Consultation letter; and
- Leaflet questionnaire.

3.2 In addition to this all of the documents listed above were available to view on the Council's website, in the 15 City of York Council libraries, and at the Council's receptions at the Guildhall and City Strategy (9 St Leonard's Place).

3.3 The 'Planning York's Future' leaflet questionnaire was distributed to every household in the city, approximately 90,000 households, as an insert in the 'Your City' publication (A copy of the leaflet is included in Annex 2).

Media

3.4 In addition to distributing the documentation, the Council sought to further publicise the consultation and give details on how and when comments could be made. At the start of the consultation the Council published a press release, the consultation featured in the 'Your City' circulation in June 2009 (with leaflet questionnaire). An article also appeared in The Press on 17 July 2009 highlighting the involvement of the Chamber of Commerce and York Property Forum and publicising the consultation.

4. Consultation Events

- 4.1 Details on each event held as part of the consultation are outlined below. A schedule of all the events is provided in Annex 3.

Exhibitions

- 4.2 The Council organised a series of exhibitions at locations across the city. The exhibitions were staffed by officers and provided the opportunity for members of the public to find out about the consultation. Exhibitions were held at the following locations:

- City centre – 31 July and 1 August 2009;
- Central Library – 4 August 2009;
- Designer Outlet – 19 August 2009;
- Monks Cross Shopping Park – 20 August 2009;
- York College – 17 September 2009;

Similarly exhibitions were held at a number of major employers in the city:

- CYC – 24 July 2009;
- Shepherd Building Group – 11 August 2009;
- Primary Care Trust – 14 August 2009; and
- CPP – 26 August 2009.

Workshops

- 4.3 The Council held four workshops over the consultation period:
- a one day conference event for interest groups, members of the Talkabout Panel (York's citizen's panel) and developers – 28 July 2009;
 - a half day workshop with key stakeholders on affordable housing – 21 September 2009;
 - an evening workshop with the York Professionals and York Business Forum – 28 September; and
 - a half day workshop with the Inclusive York Forum – 8 October 2009.
- 4.4 Each workshop on the Core Strategy took a similar format, commencing with short presentations on the preferred approach to particular topics. These were followed by small group discussions based around a series of key questions to encourage a debate. The workshops were tailored to particular areas of the Core Strategy depending on the area of interest of the attendees. For example topics included the vision, options for delivering affordable housing; planning an attractive place for business; and planning for inclusive communities.
- 4.5 In total more than 160 people took part in the workshops, attendees ranged from individual residents and people from businesses in the city, to representatives from interest groups and developers.

LSP Board Meetings

- 4.6 Officers did a presentation on the Core Strategy Preferred Options at the Without Walls Board on 14 July 2009 and attended most of the Local Strategic Partnership boards to make them aware of the relevance of the document to their areas of interest and the opportunity to comment. The boards attended included the Environment Partnership, the Economic Development Partnership, the Learning City Partnership, York at Large, the Inclusive York Forum and the YorOK Board.

Ward Committees

- 4.7 The Core Strategy Preferred Options document was publicised at the ward committees during June and July 2009. Officers attended or provided exhibitions at all ward committees. In addition, where requested officers did presentations and Q&A as part of the ward committee agenda. The latter included the Holgate; Haxby and Wigginton; Derwent, Heworth Without and Osbaldwick; and Heslington and Fulford ward committees.

Forums

- 4.8 Officers attended a number of local forums to discuss the Core Strategy Preferred Options. Presentations and Q&A took place at meetings of the York Environment Forum, Open Planning Forum, York Independent Living Forum, York Archaeological Forum and Voluntary Sector Strategic Forum.

Meetings

- 4.9 In addition to the events outlined above, a number of meetings were held as part of the consultation to enable more in depth discussions with a range of groups, including the statutory consultees. These comprised:
- meetings with key stakeholders including York Civic Trust, Natural England, English Heritage, Environment Agency, Government Office Yorkshire and Humber (GOYH), and Local Government Yorkshire and Humber (LGYH);
 - a meeting with a focus group from the York Property Forum and York and North Yorkshire Chamber of Commerce; and
 - meetings with neighbouring local authorities including Leeds City Council, Ryedale District Council, and East Riding District Council.

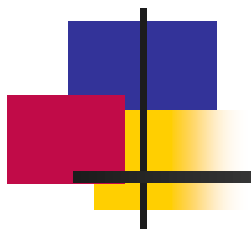
5. Consultation Response

- 5.1 Over 2,250 'Planning York's Future' questionnaires were returned and a total of 1249 separate comments on the Core Strategy document were received as a result of the consultation from 117 respondents. Respondents included a variety of groups, organisations and individuals. In addition over 160 people gave their views by attending one of the consultation workshops. It is estimated that around a further 500 people were made aware of the consultation through attending meetings, forums, ward committees and exhibitions across the city where the Core Strategy was being publicised and discussed.

- 5.2 The subsequent sections of this document provide a detailed summary of the various elements of the consultation.

6. Response to ‘Planning York’s Future’ Questionnaire

- 6.1 This questionnaire was distributed to every household in the city, as an insert to the ‘Your City’ publication (approx 90,000 households) and over 2,250 were returned, giving a 2.6% response rate, which was considered to be a good response, given the relatively complex nature of the questionnaire. This document sets out the results and questionnaire findings, and analyses the key issues.



Local Development Framework Core Strategy Preferred Options - August 2009 FULL REPORT

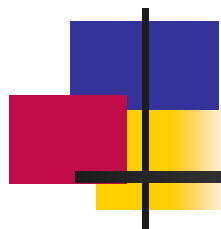
Report author:

Nicola Lawson

Market Research Team

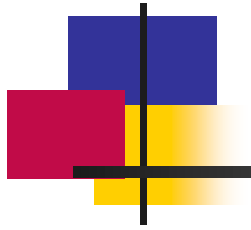
Marketing and Communications

nicola.lawson@york.gov.uk



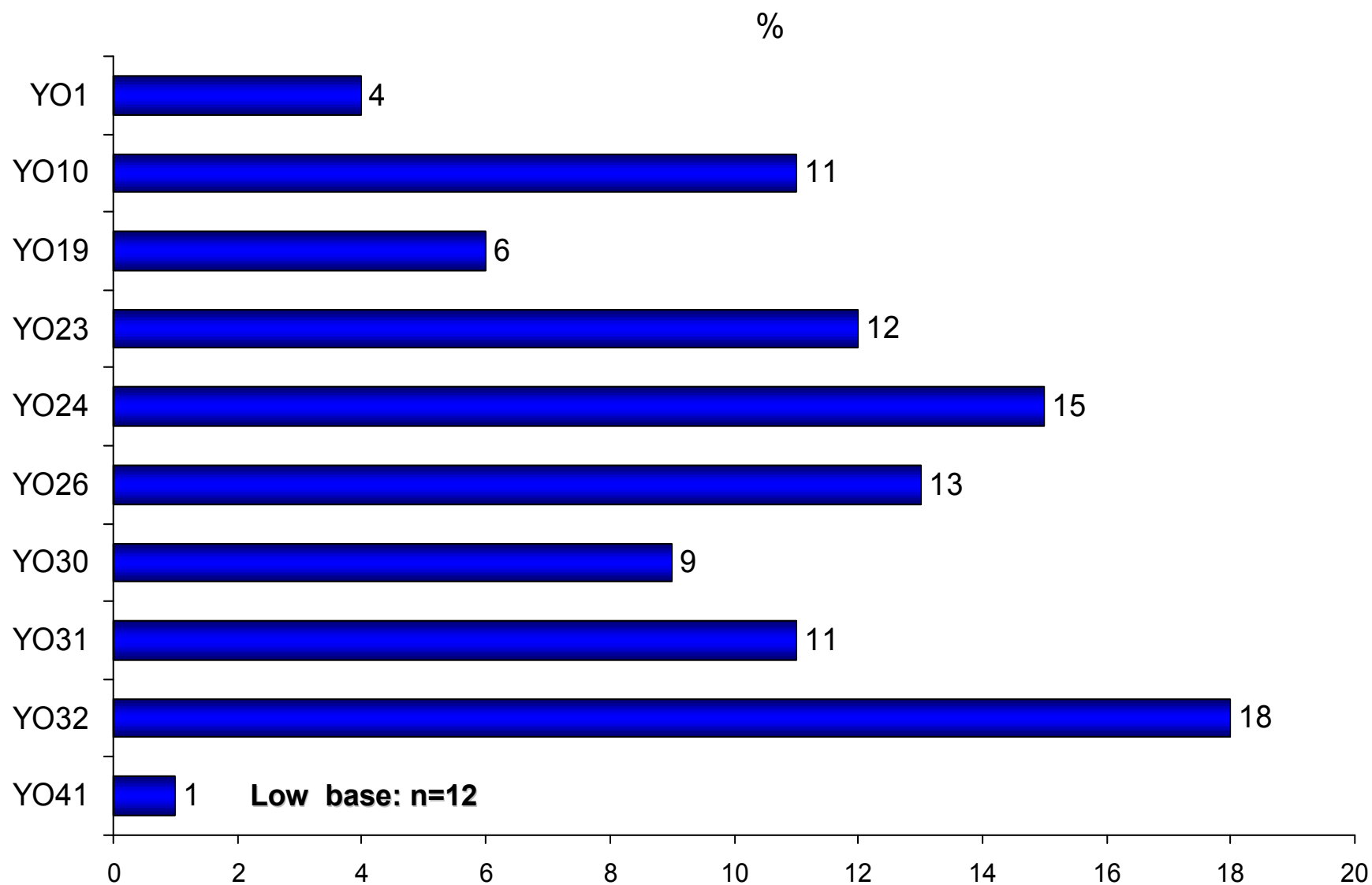
Background & methodology

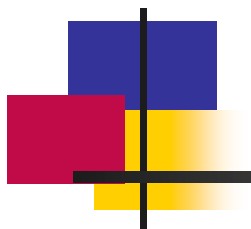
- The Core Strategy is the principal document in the Local Development Framework (LDF). It will set out the overall strategy of the LDF and the key strategic policies against which all development will be assessed. All other Development Plan Documents (DPDs) prepared by the council will have to conform with the Core Strategy and contain policies and proposals which support its strategic vision, objectives and spatial strategy.
 - The Preferred Options stage of the Core Strategy follows on from the Issues and Options stage which was consulted on in June 2006 (Issues and Options 1) and again in August 2007 (Issues and Options 2). The Preferred Options document sets out a clear Vision and Spatial Strategy as well as broad strategic objectives, targets and policies about York's key issues.
 - The survey was posted to all York households (89,000) in June 2009 as an insert in the council's publication *Your City*. The closing date for responses was 28 August 2009. Residents were also given the option to complete the survey online via the council's website. The survey was part of a larger consultation on the LDF Core Strategy carried out during summer 2009.
 - 2,250 surveys were completed; 2,200 by post and 50 online. This represents 2.6% of all households and 1.2% of the York population. This means the results are accurate to within +/- 2% at 95% confidence interval. Where percentages do not sum to 100%, this is either due to multiple responses or decimal rounding. The figures for each question have been calculated after the respondents who did not answer the questions have been removed from the bases.
 - City Strategy developed the survey. The data inputting was conducted by Advanced Data Tabulation Services (ADTS) and the report was written by Marketing & Communications.
-



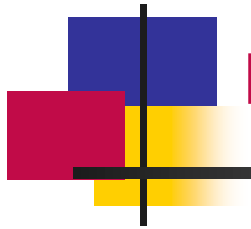
Sample profile for postcodes

The sample spans all the CYC postcode areas.





Findings



LDF Vision and key themes

Base: all respondents who answered the question (no response = 365 of 2,250 total sample)

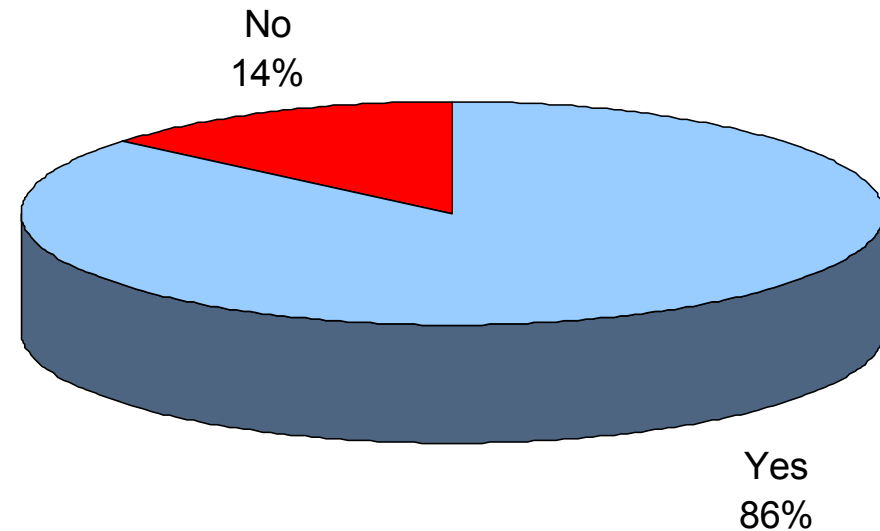
Q1: Do you think that this Vision Statement and the four themes above are appropriate for York?

LDF Vision

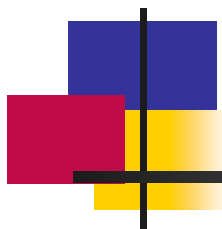
York aspires to be: a city of confident, creative and inclusive communities; economically prosperous at the forefront of innovation and change; and a world class centre for education; whilst preserving and enhancing its unique historic character and setting and fulfilling its role as a leading environmentally friendly city.

Key themes

- Building Confident, Creative and Inclusive Communities.
- A Prosperous and Thriving Economy.
- An Environmentally Friendly City.
- York's Special Historic and Built Environment.



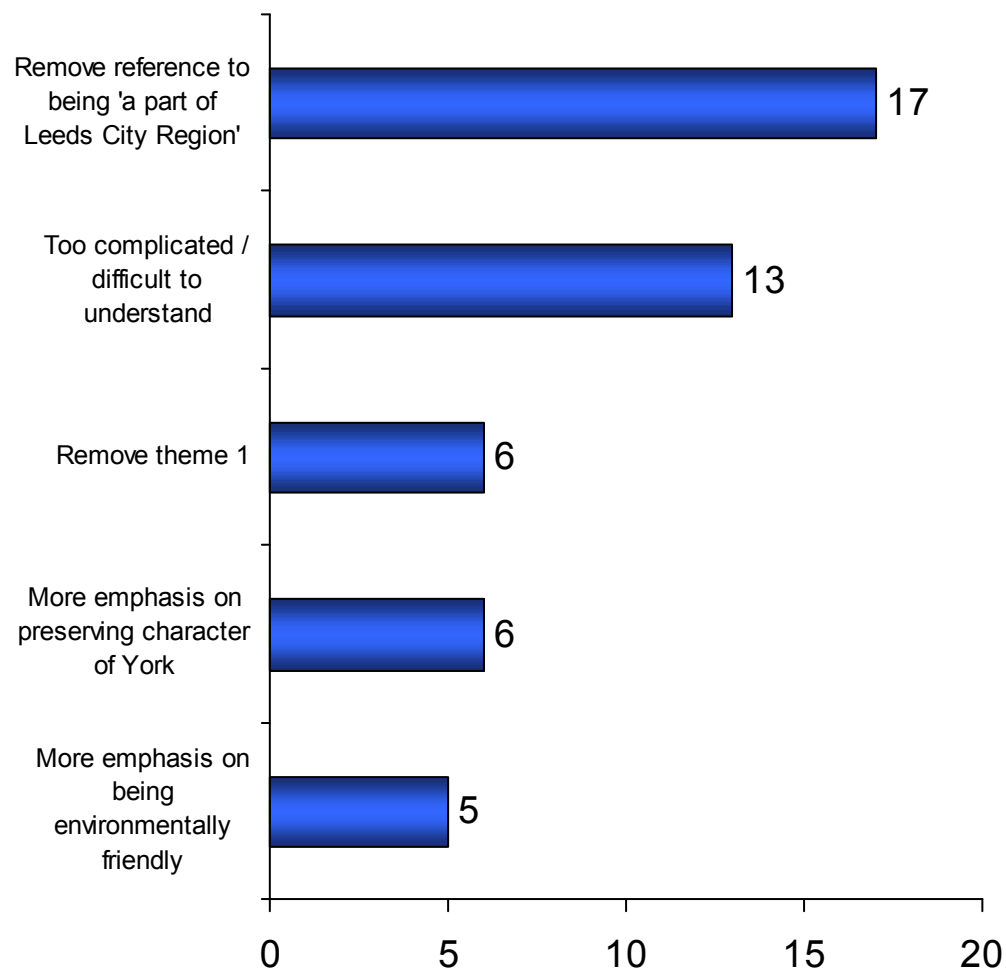
Over four-fifths (86%) of respondents agreed that the Vision Statement and the four themes are appropriate for York, whilst 14% did not.



LDF Vision and key themes

Base: all respondents who answered 'no' to question 1 (n=269)
(no response = 68 of 269 sample)

If no, what needs to be changed? %



Respondents who disagreed that the Vision Statement and the four themes are appropriate for York were then asked what needs to be changed.

17% believe that any reference to being part of 'Leeds City Region' needs to be removed, whilst 13% said the vision statement and themes are too complicated or difficult to understand.

6% of respondents said both that theme 1 (Building Confident, Creative and Inclusive Communities) should be removed and there should be more emphasis on preserving the character of York.

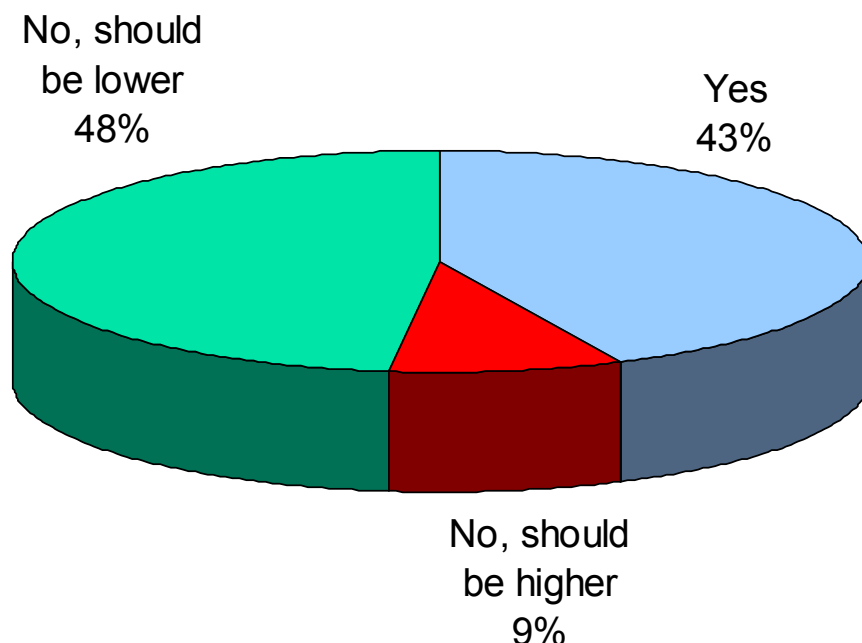
The remaining 5% said that there needs to be more emphasis on being environmentally friendly.

Land for Jobs

Base: all respondents who answered the question (no response = 308 of 2,250 total sample)

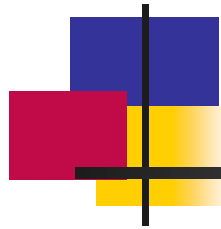
A study undertaken in 2007-08 predicted that York's economy would grow by over 1,000 jobs per year, similar to the past 10 years. In spite of the current recession, the council still feels that this is reasonable, as over the long plan period (20 years) there are bound to be ups and downs in the economy. The majority of the new jobs will be accommodated within York's main built up area however additional land is likely to be needed outside the main built up areas, for industry and distribution.

Q2: Do you agree with the number of predicted jobs?



Just over two-fifths (43%) of respondents agreed with the number of predicted jobs.

However nearly half (48%) of the sample believe the number of predicted jobs should be lower. The remaining 9% of respondents said that the number should be higher.



Land for Homes

Background

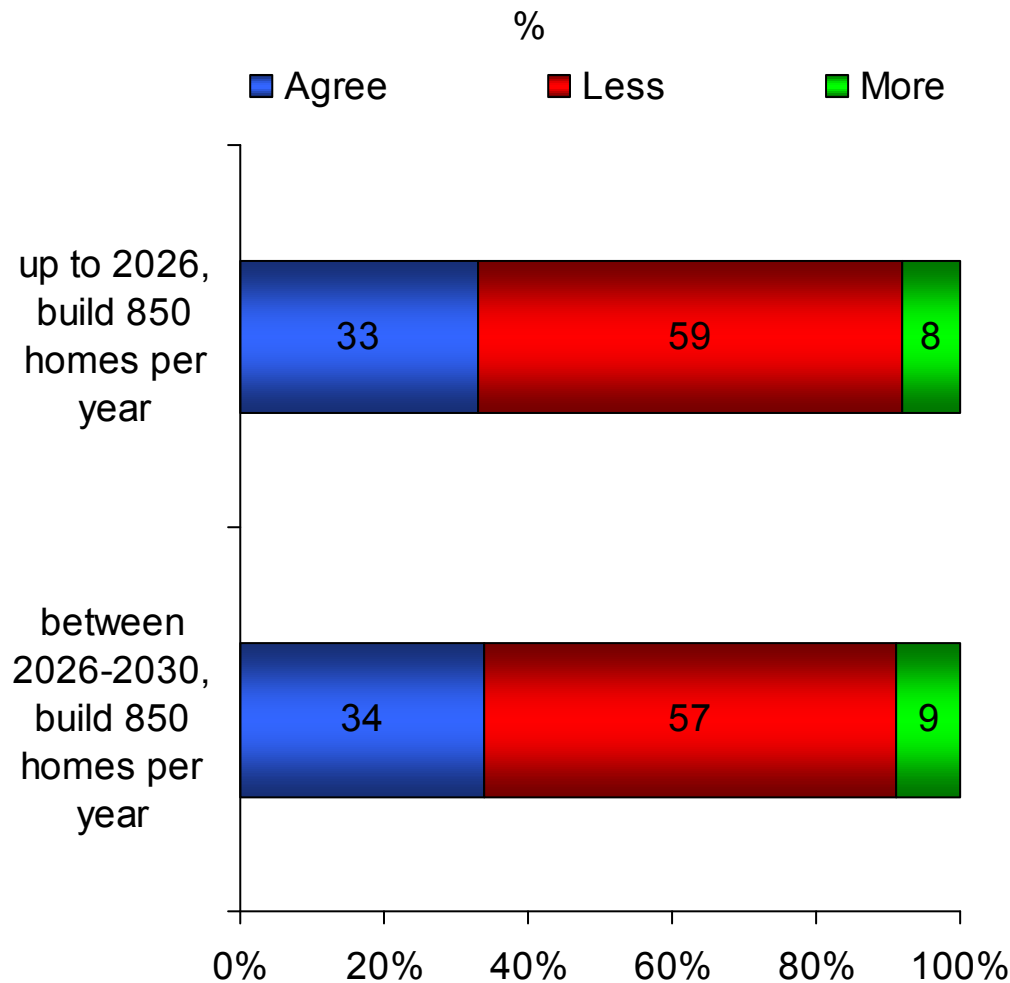
The Regional Plan requires that York provides an average of 850 new homes a year until 2026. This is less than the number of homes you would need if you simply looked at the city's population projections. Using a figure of 850 homes per year over the full period of the plan, up to 2030 we would have a shortfall of land for 6,600 homes that we couldn't accommodate in the main built up areas of York. In the past, York has benefited from a significant number of 'windfall' sites; these are brownfield sites that become available at short notice, for example the Terry's factory. National guidance does not let us make an allowance for as yet unidentified new windfalls to be included in the plan but as we are planning over a long period we have included an allowance of 2,200 windfalls beyond 2025.

If we include these windfalls then the shortfall is reduced to 4,400 homes which we may need to accommodate on land outside York's main built up areas, currently within the draft Green Belt. Concerns have been expressed about the impact this may have on the city's setting, natural environment and services.

Land for Homes

Q3: In light of the current recession, but given the long timescale of the plan (LDF) and housing pressures in York, do you think we should...

Base: all respondents who answered the question (no response 'up to 2026' = 171 of 2,250 total sample, 'between 2026' = 278 of 2,250 total sample)



A third (33%) of the sample agree that we should build 850 homes per year, up to 2026. 8% said we should build more than 850, whilst three-fifths (59%) believe the number should be less.

Again a third (34%) of respondents agreed that we should build 850 homes per year, between 2026-2030. Over half (57%) of the sample believe the number should be less than 850, whilst 9% think it should be more.

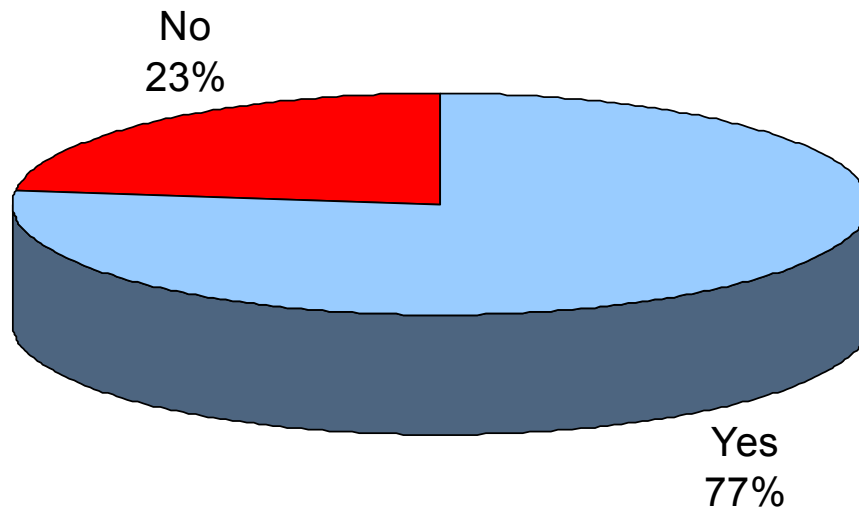


Land for Homes

Base: all respondents who answered the question (no response = 129 of 2,250 total sample)

If we were able to use windfalls this could reduce the amount of land we need to develop in the draft Green Belt.

Q4: Do you think that the council should be allowed to include a higher level of windfalls in the plan (LDF)?



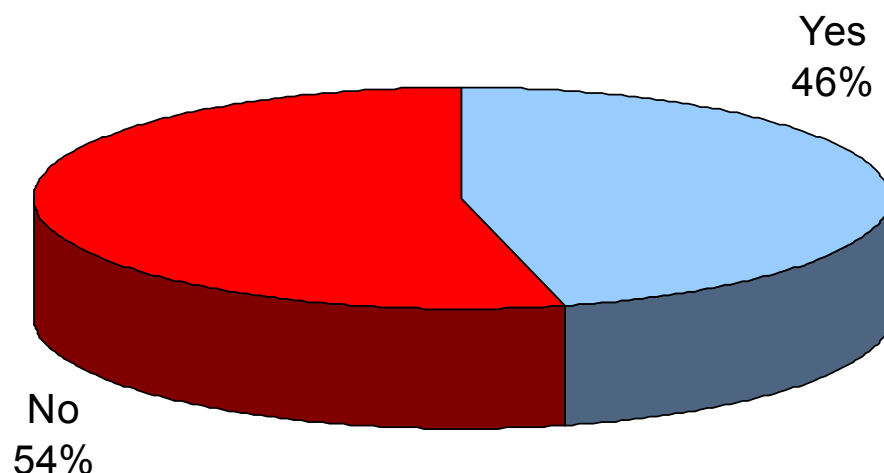
Just over three-quarters (77%) of respondents agree that we should be allowed to include a higher level of windfalls in the plan, whilst a quarter (23%) disagree.

Land for Homes

Base: all respondents who answered the question (no response = 106 of 2,250 total sample)

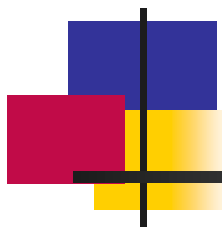
Another way of minimising the amount of draft Green Belt land needed for homes would be to build at higher densities in existing built up areas.

Q5: Would you be prepared to see more densely built developments than those which currently exist in your area to reduce the need for development on land currently in the Green Belt?



In order to reduce the need for development on land currently in the Green Belt, 46% of respondents said that they would be prepared to see more densely built development than those which currently exist in their area.

However over half (54%) of the sample do not agree with more densely built development in their local area.

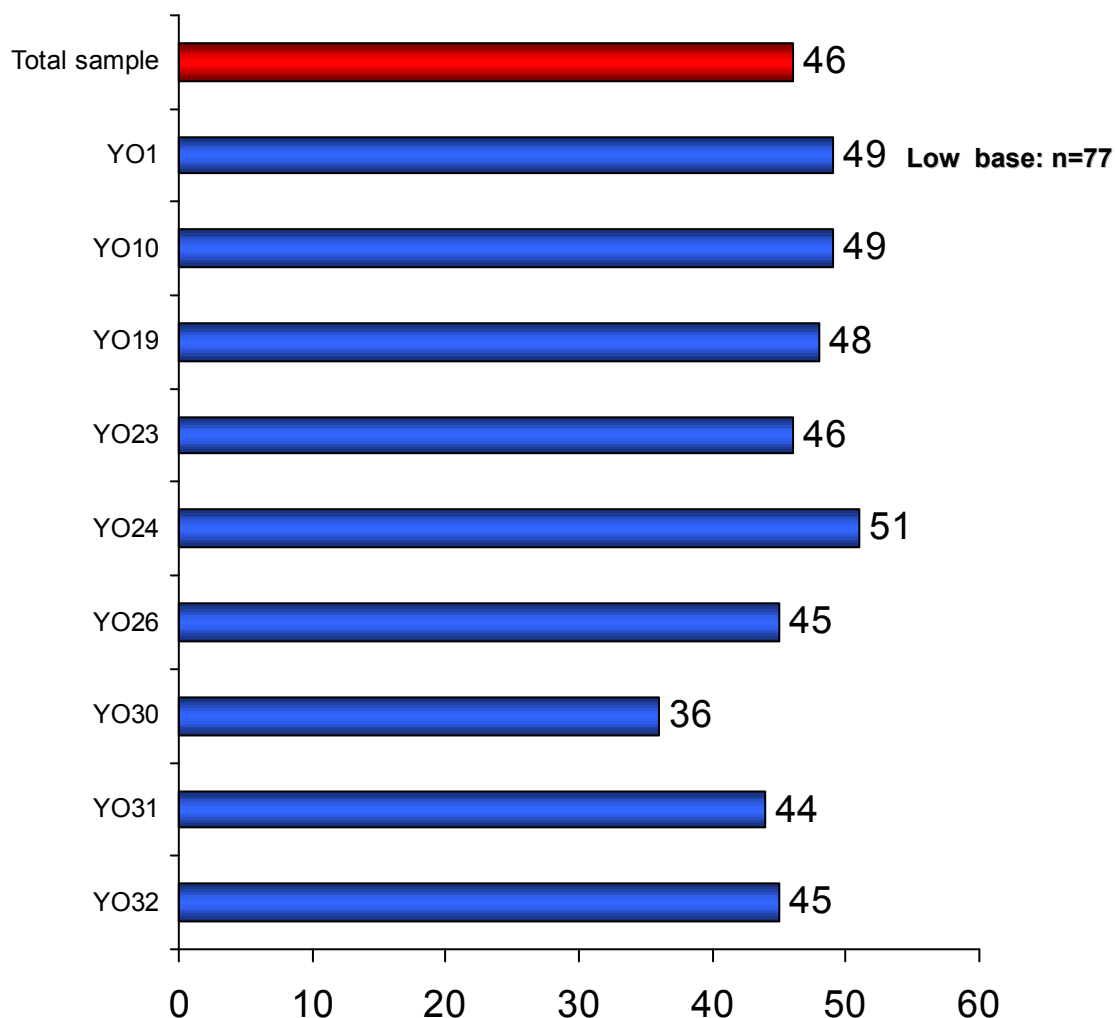


Land for Homes – postcode analysis

Q5: Would you be prepared to see more densely built developments than those which currently exist in your area to reduce the need for development on land currently in the Green Belt?

Base: all respondents who answered the question (no response = 106 of 2,250 total sample)

Yes, more densely built developments in your area %



*Results for YO41 have been excluded from postcode analysis due to a very low overall sample number (n=12)

Respondents living in postcode area YO30 were less likely to agree to more densely built developments in their local area (36%), in order to reduce the need for development on land currently in the Green Belt.

This is compared to around half (51%) of those living in YO24 agreeing to further development in their area.

1. Protecting areas that preserve York's Historic Character and Setting

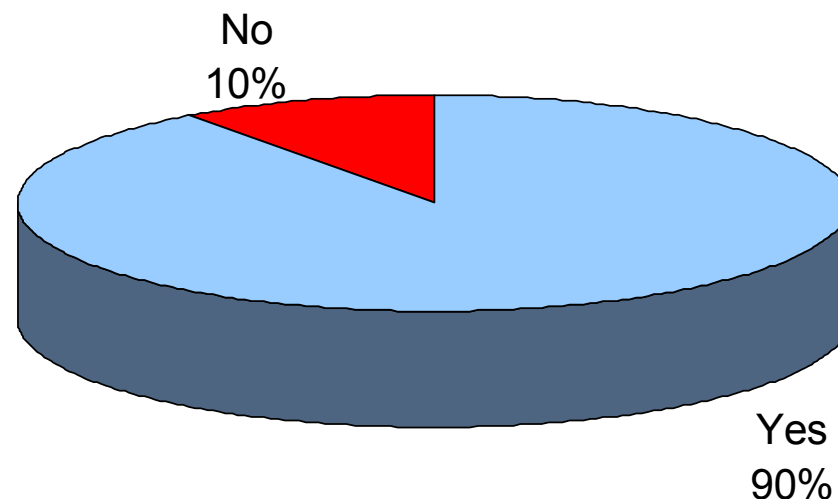
Q6a: Do you think that this is appropriate?

Base: all respondents who answered the question (no response = 148 of 2,250 total sample)

We recognise the main built up area of York as being the primary focus for housing, jobs, shopping, leisure, education, health and cultural activities and facilities. However, as highlighted we may need, through the plan (LDF) process, to find land outside the main built up areas of York for employment and housing. If we need to take this approach, it will be based upon the following:



- River Corridor
- Strays
- Green Wedge
- Extension of Green Wedge
- Areas retaining rural setting
- Areas preventing coalescence
- Village setting



Nine out of ten (90%) respondents believe that the areas identified for preserving York's Historic Character and Setting are appropriate, whilst 10% do not.

3% of the sample commented that the areas of Green Wedges should be larger.

2. Protecting York's Green Infrastructure including Green Corridors and Nature Conservation Sites

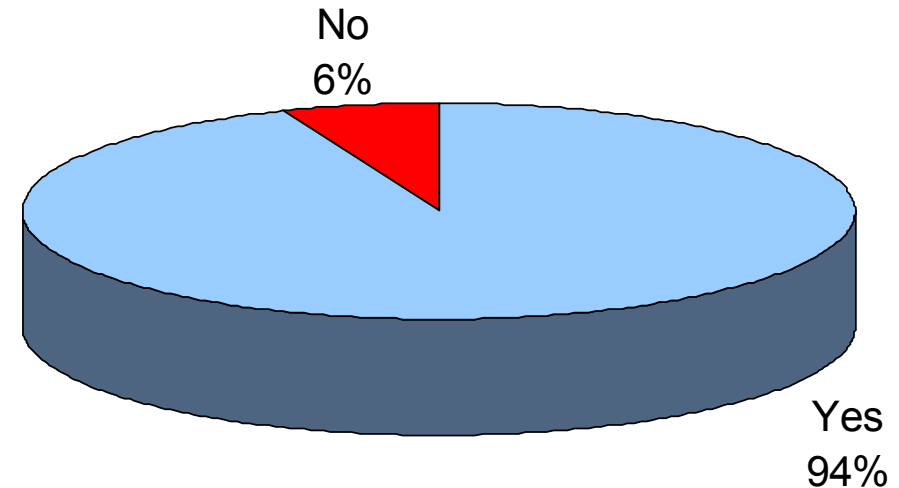
Q6b: Do you think that this is appropriate?

Base: all respondents who answered the question (no response = 128 of 2,250 total sample)

We recognise the main built up area of York as being the primary focus for housing, jobs, shopping, leisure, education, health and cultural activities and facilities. However, as highlighted we may need, through the plan (LDF) process, to find land outside the main built up areas of York for employment and housing. If we need to take this approach, it will be based upon the following:



- Regionally significant green corridors
- Nationally, regionally and locally designated nature conservation sites



94% of respondents agree with the areas identified to protect York's Green Infrastructure, whilst 6% do not.

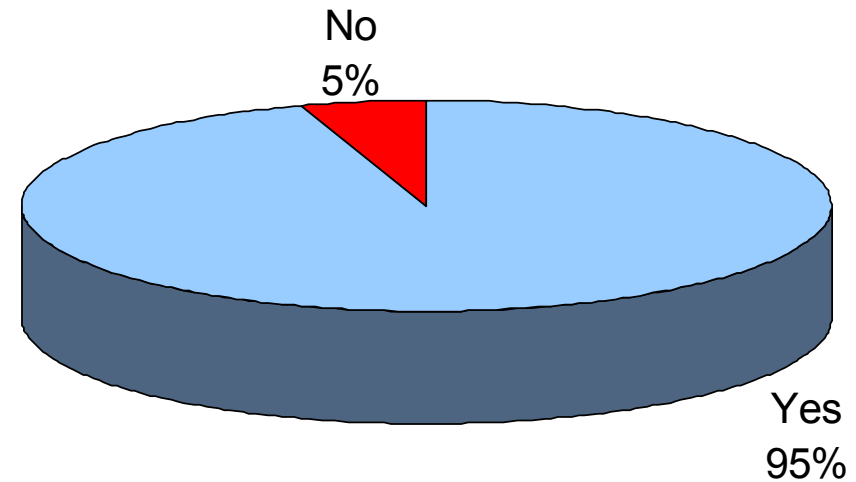
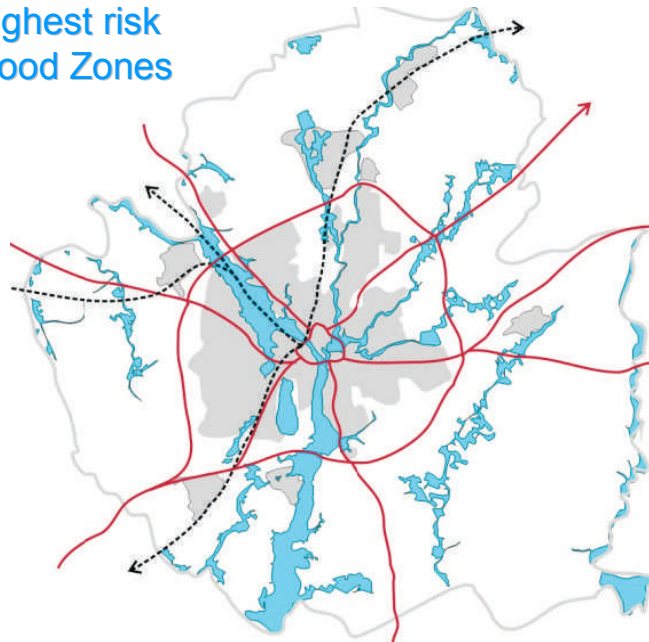
3. Minimising Flood Risk

Q6c: Do you think that this is appropriate?

Base: all respondents who answered the question (no response = 186 of 2,250 total sample)

We recognise the main built up area of York as being the primary focus for housing, jobs, shopping, leisure, education, health and cultural activities and facilities. However, as highlighted we may need, through the plan (LDF) process, to find land outside the main built up areas of York for employment and housing. If we need to take this approach, it will be based upon the following:

Highest risk
Flood Zones



95% of the sample agree that the highest risk flood zones identified for minimising flood risk are appropriate, whilst 5% do not.



Land outside the main built up areas of York

Q6d: What other issues do you think we should consider?

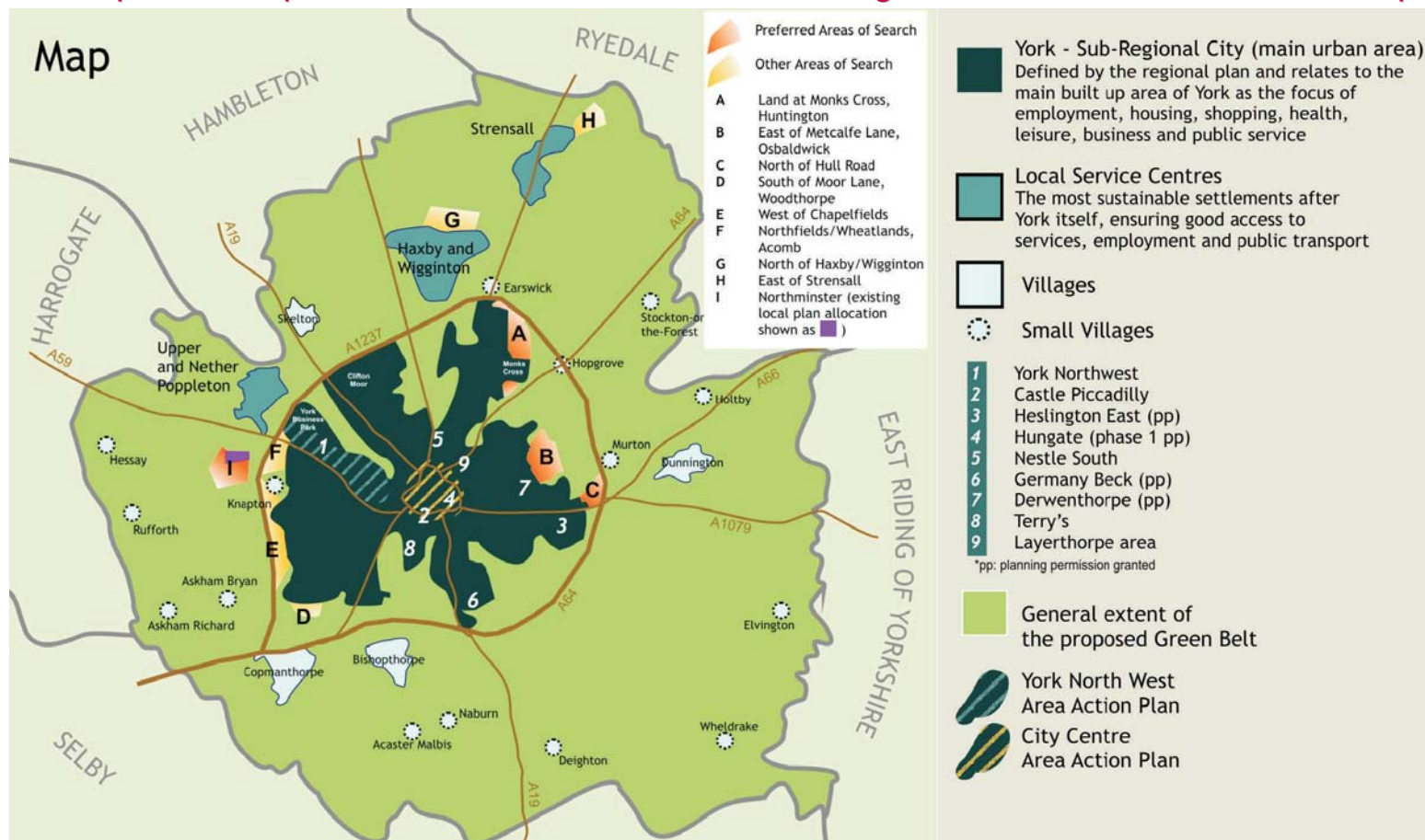
Base: all respondents who answered the question (no response = 1516 of 2,250 total sample)

Respondents were asked if there are any other issues that have not been considered, to which 67% did not comment. Of the individuals who did comment the main issues raised were:

- **Preserve the Green Belt or don't build houses in the Green Belt.**
- **Don't build new houses on the flood plain areas.**
- **Ensure that there is a good provision of public transport.**
- **Ensure that areas have good drainage or proper water run off areas.**
- **Dredge the rivers or becks regularly.**
- **Preserve the identity of villages.**
- **Ensure that flood protection measures are in place.**
- **Ensure that areas have good local amenities to cope with any development.**
- **York is big enough already or York can not take any more growth.**
- **Redevelop properties that are already empty.**
- **Use brownfield sites for any development.**
- **Build more council houses or provide more affordable housing.**

Planning York's Future

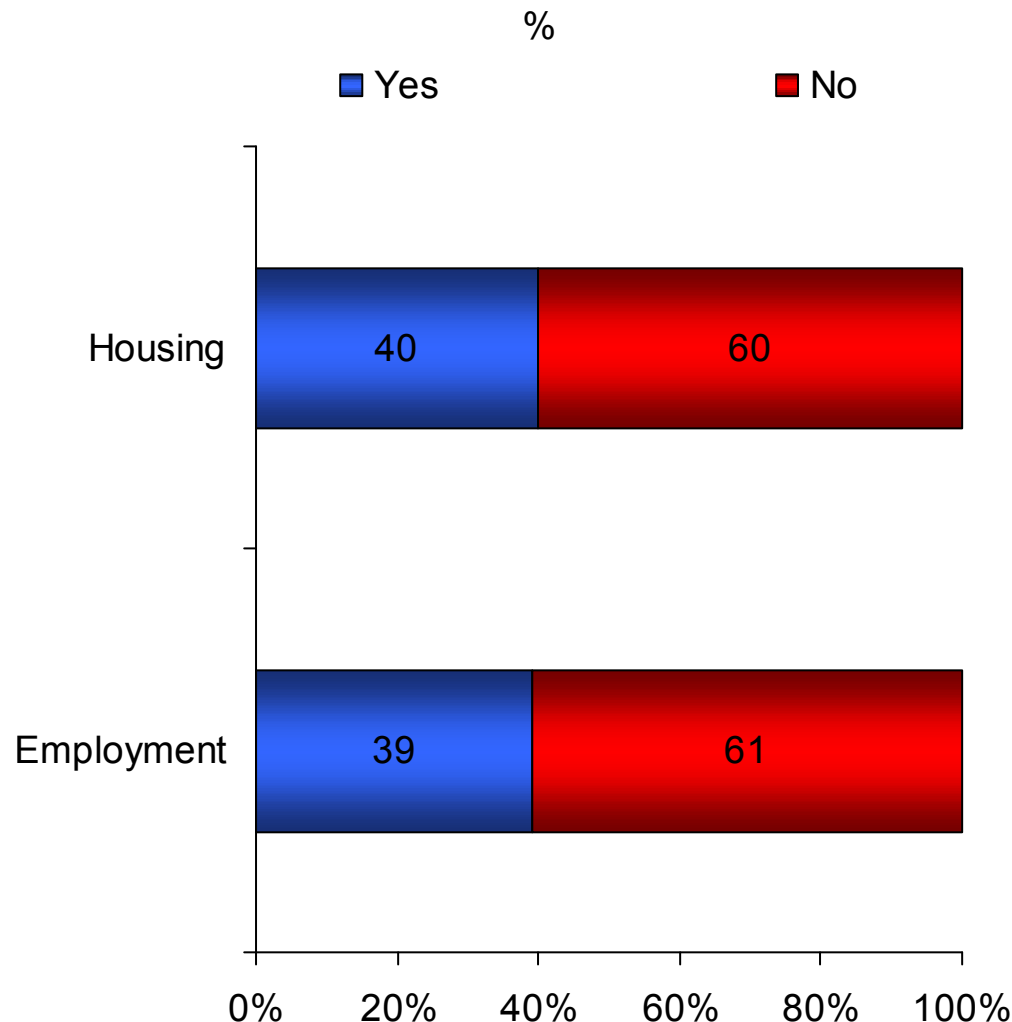
When the areas for 1. Preserving York's historic character and setting, 2. Protecting York's Green Infrastructure, 3. Minimising flood risk, are brought together, this leads to nine potential areas currently in draft Green Belt (A-I on map) where development could be accommodated should additional land be needed. We then looked further at the transport network, landscape character, agricultural land quality and open space levels. This leads to areas A, B, C and I as the preferred options, with A and B for suitable housing and C and I most suitable for employment.



Identifying land for development

Q7: Do you think it is appropriate to identify land for development on the draft Green Belt...for a) housing and b) employment?

Base: all respondents who answered the question (no response 'housing' = 105 of 2,250 total sample, 'employment' = 133 of 2,250 total sample)



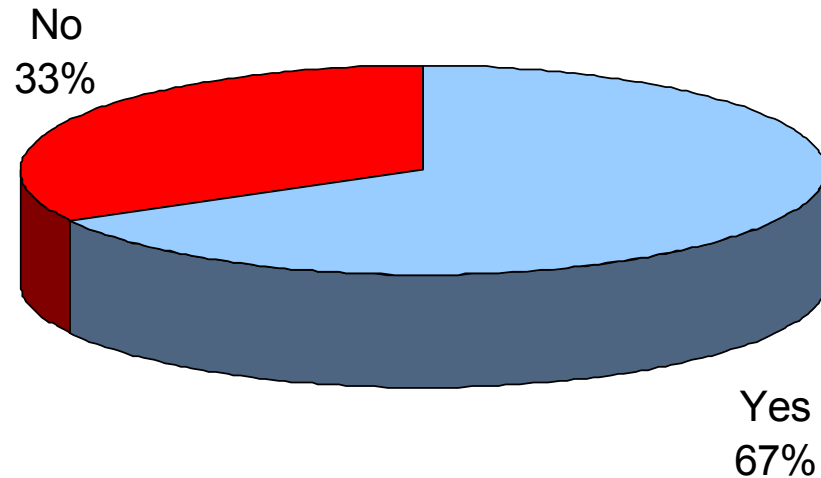
In terms of identifying land on the draft Green Belt for housing, two-fifths (40%) of respondents agreed with this. However three-fifths (60%) disagreed.

39% of the sample agreed with identifying land for employment on the draft Green Belt, whilst 61% did not.

Building new homes

Q8: If we need to identify land for new homes do you think that areas A and B, currently in the draft Green Belt, are the most suitable locations?

Base: all respondents who answered the question (no response = 171 of 2,250 total sample)



Two-thirds (67%) of respondents agree that areas A and B are suitable locations for building new homes. The remaining third (33%) do not agree.

If no, which other areas would be more suitable? (please mark on the map)

The 33% of respondents who did not agree with the areas identified for building new homes were asked to suggest areas they think would be more suitable.

Half of respondents did not suggest an alternative, of those that did the main areas identified were:

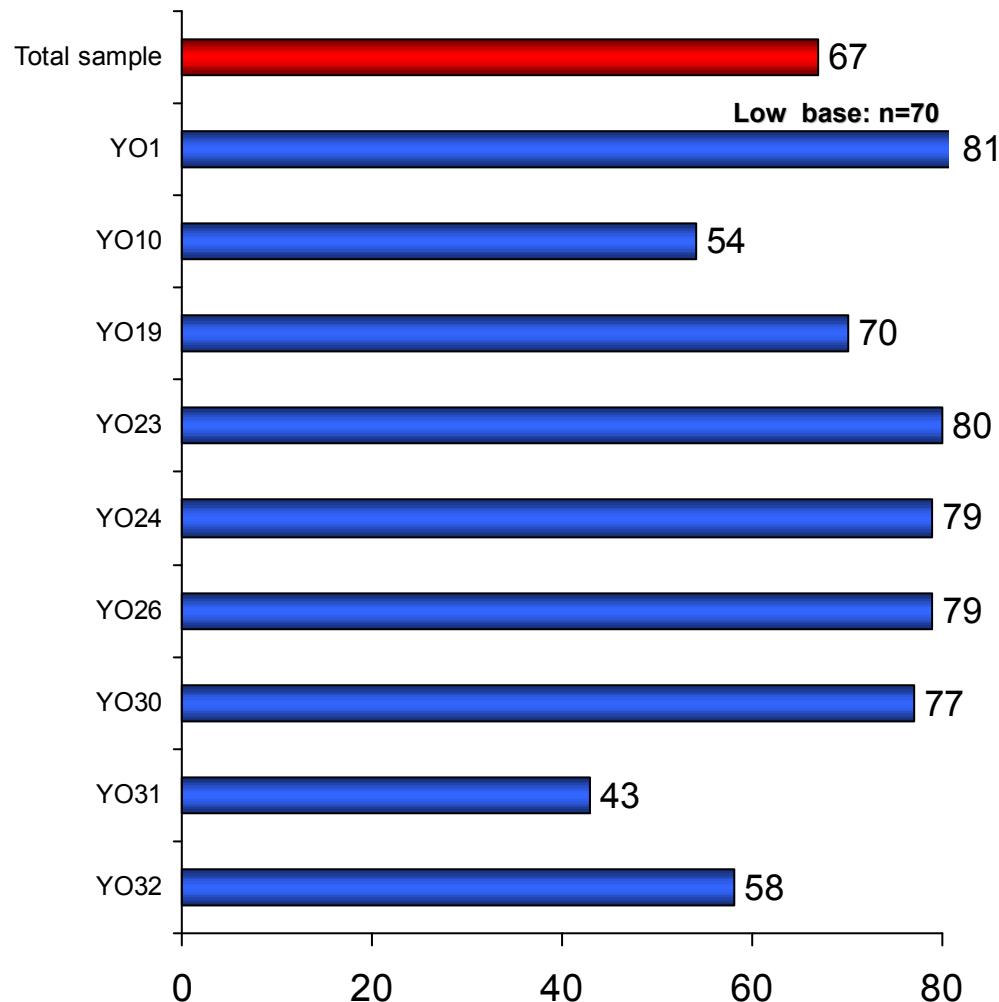
- Area E
- Area F
- Area D
- Brownfield sites only

Building new homes – postcode analysis

Q8: If we need to identify land for new homes do you think that areas A and B, currently in the draft Green Belt, are the most suitable locations?

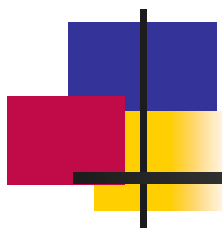
Base: all respondents who answered the question (no response = 171 of 2,250 total sample)

Yes, areas A and B are most suitable locations %



*Results for YO41 have been excluded from postcode analysis due to a very low overall sample number (n=12)

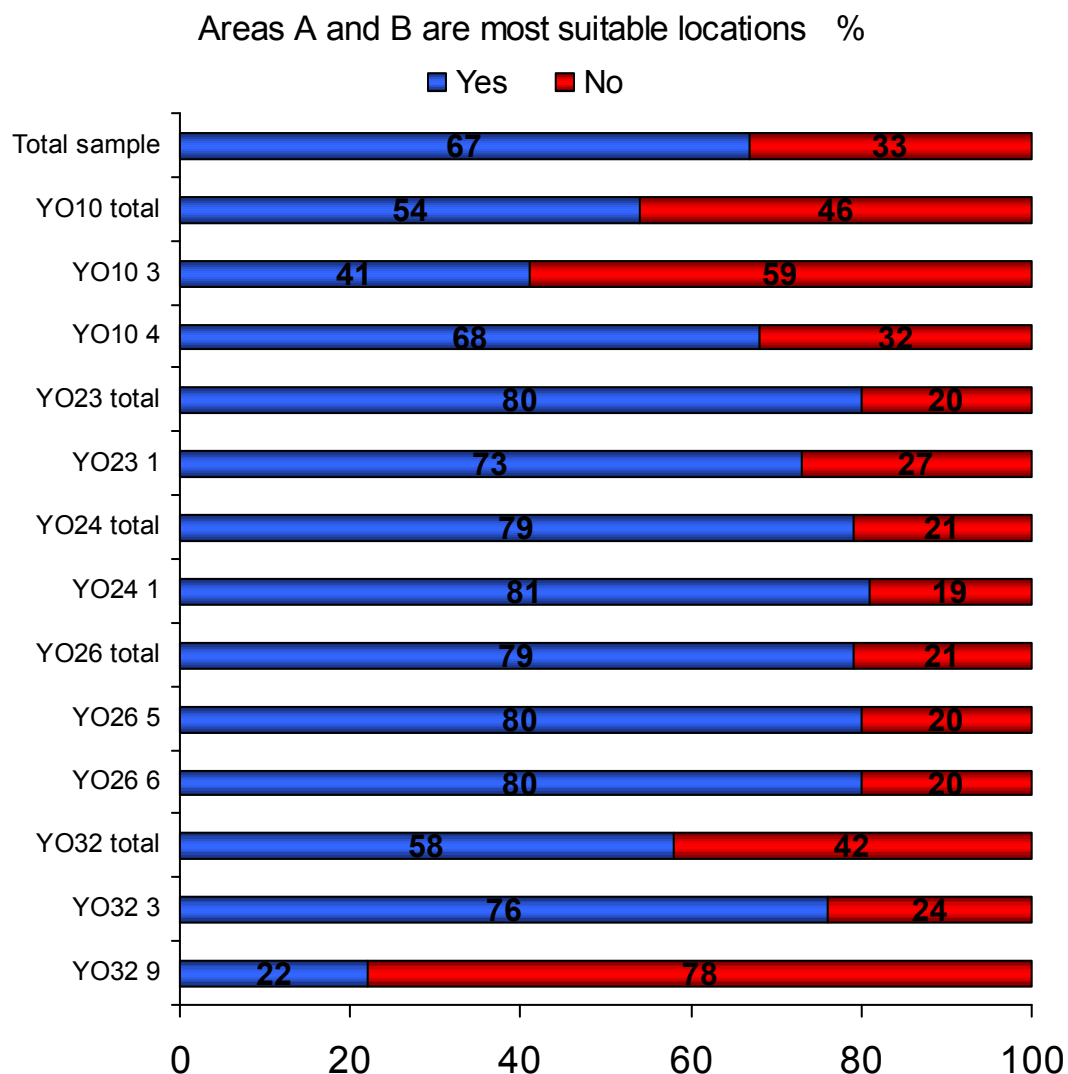
Respondents living in postcode areas close to area A (YO31) and area B (YO10), were less likely to agree that these areas are suitable locations for building new homes (43% for YO31 and 54% for YO10).



Building new homes – lower level postcode analysis

Q8: If we need to identify land for new homes do you think that areas A and B, currently in the draft Green Belt, are the most suitable locations?

Base: all respondents who answered the question (no response = 171 of 2,250 total sample)



***Only postcode areas with a sample base of 75 or above have been charted due to the reliability of data.**

Respondents living in postcode areas YO10 3 and YO32 9 were less likely to agree that areas A and B are suitable locations for building new homes (41% for YO10 3 and 22% for YO32 9).

Wards within postcode areas:

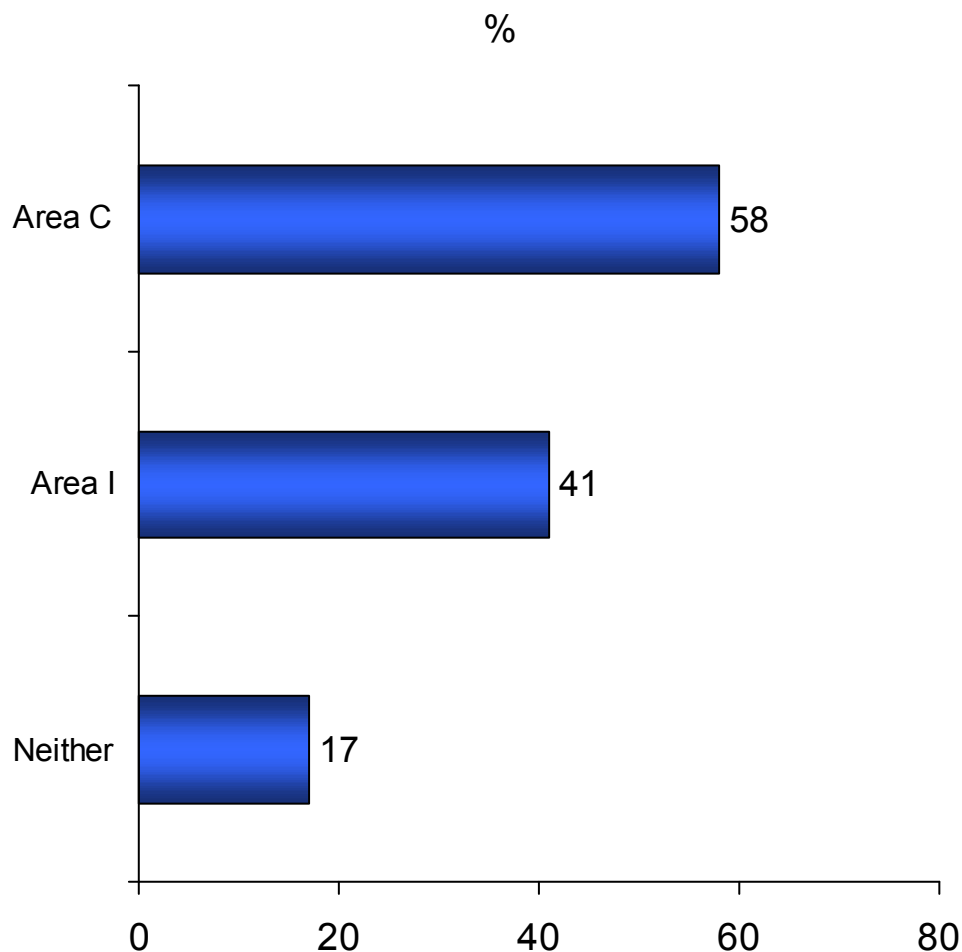
YO10 3 – Fishergate, Osbaldwick, Hull Road, Guildhall.

YO32 9 – Strensall, Huntington and New Earswick, Heworth, Heworth without.

Land for employment

Q9: If we need to identify land for employment do you think that areas C and/or I are suitable locations for industrial and distribution employment areas?

Base: all respondents who answered the question (no response = 157 of 2,250 total sample)



Over half (58%) of all respondents believe area C is suitable for industrial and distribution employment, whilst 41% agree with area I. The remaining 17% of the sample said that neither area C or I are suitable locations.

Which other areas would be suitable?

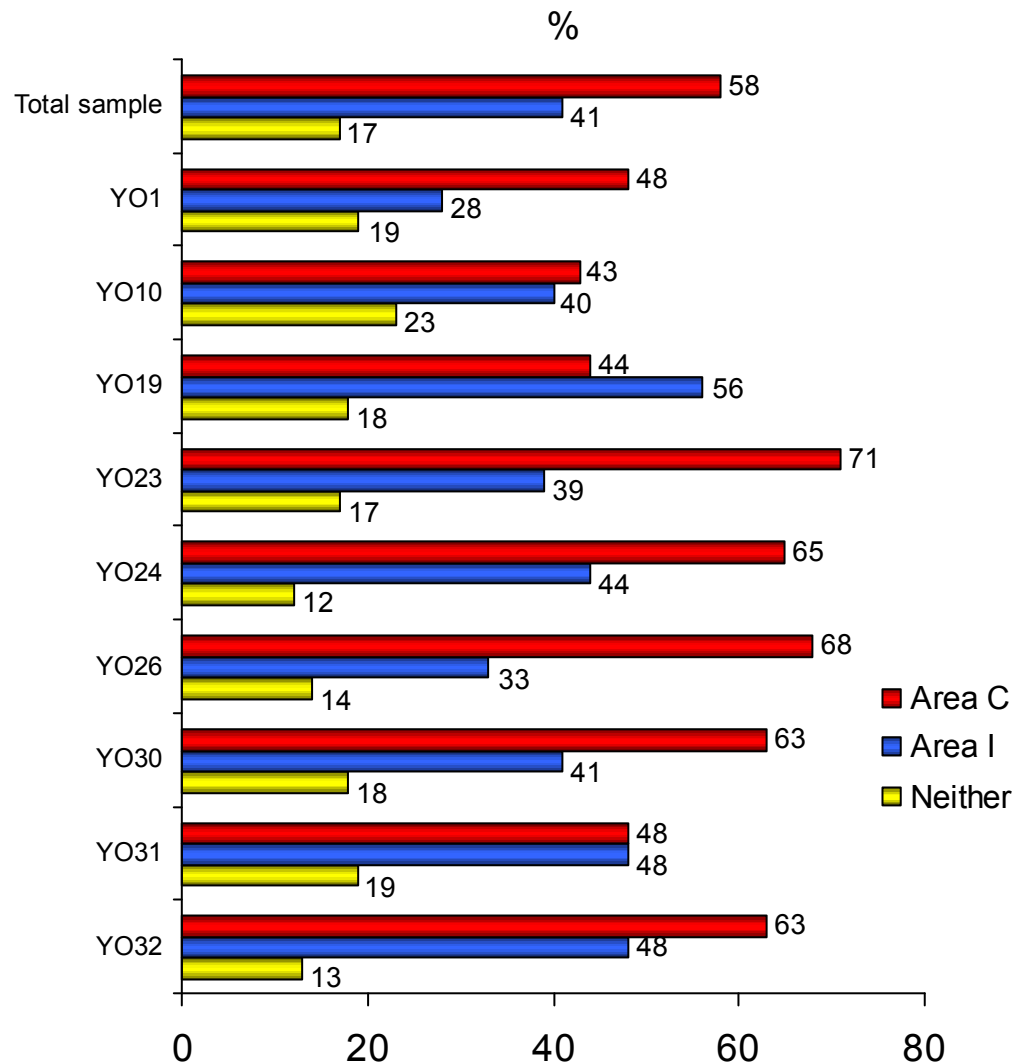
Respondents were given the option of suggesting alternative areas for industrial and distribution employment, with the main areas identified as:

- 3% Area A
- 2% Area E
- 2% Area F
- 1% Area H and D

Land for employment

Q9: If we need to identify land for employment do you think that areas C and/or I are suitable locations for industrial and distribution employment areas?

Base: all respondents who answered the question (no response = 157 of 2,250 total sample)



*Results for YO41 have been excluded from postcode analysis due to a very low overall sample number (n=12)

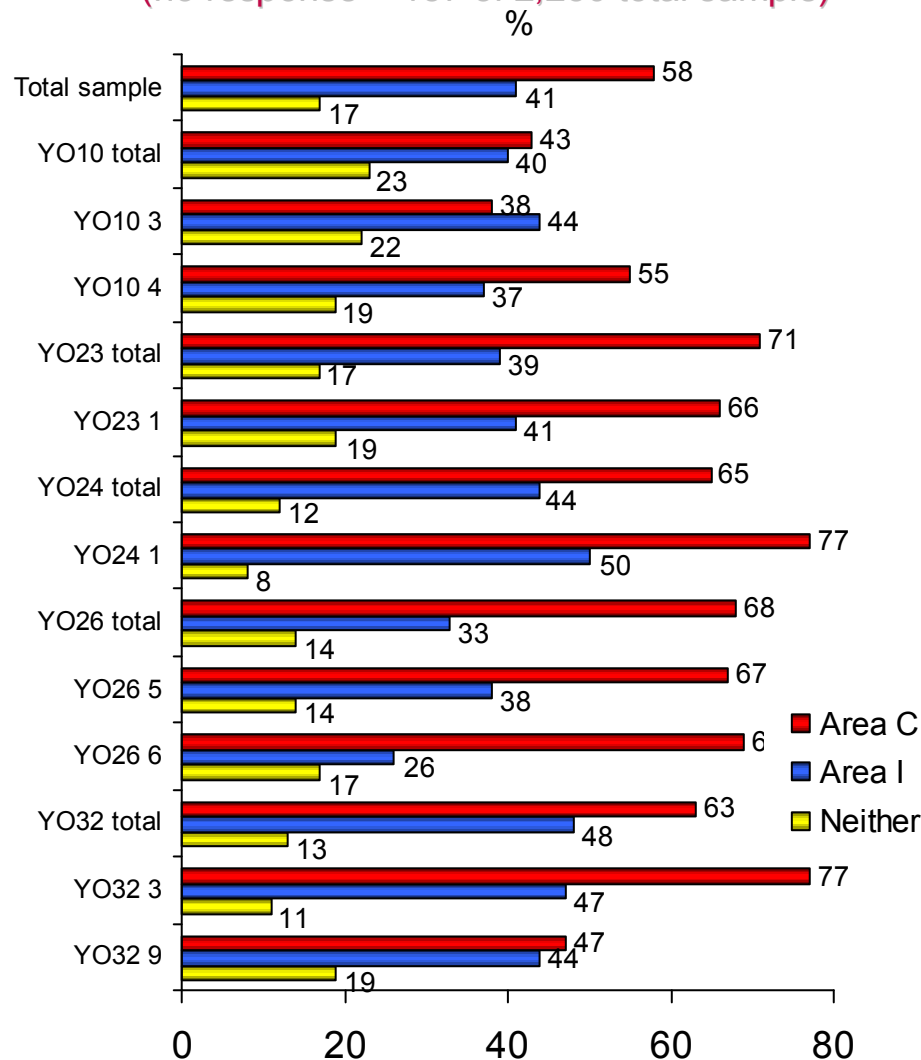
Respondents living in postcode areas close to area C (YO10 and YO19) were less likely to agree that this is a suitable location for industrial and distribution employment (YO10, 43% and YO19, 44%).

In terms of area I, again it is those respondents who live in postcode areas close to area I (YO26 and YO23) that are less likely to agree this is a suitable location (YO26, 33% and YO23, 39%).

Land for employment

Q9: If we need to identify land for employment do you think that areas C and/or I are suitable locations for industrial and distribution employment areas?

Base: all respondents who answered the question
(no response = 157 of 2,250 total sample)



*Only postcode areas with a sample base of 75 or above have been charted due to the reliability of data.

In terms of area C, respondents living in YO24 1 and YO32 3 (both 77%) were more likely to agree that this is a suitable location for industrial and distribution employment.

Respondents living in postcode areas YO10 3 and YO32 9 were least likely to agree that area C is a suitable location (38% for YO10 3 and 47% for YO32 9).

For area I, respondents living in area YO24 1 were more likely to agree that this is a suitable location (50%), whilst those living in area YO26 6 were least likely to agree (26%).

Wards within postcode areas:

YO10 3 – Fishergate, Osbaldwick, Hull Road, Guildhall.

YO24 1 – Micklegate, Dringhouses and Woodthorpe.

YO26 6 – Rural West York, Acomb, Mickelgate.

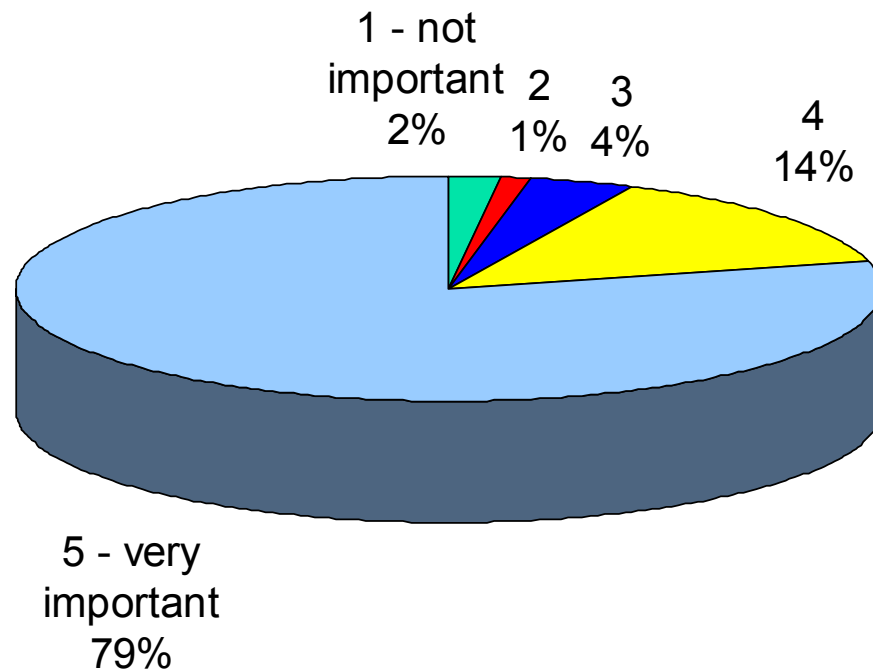
YO32 3 – Haxby and Wigginton, Huntington and New Earswick.

YO32 9 – Strensall, Huntington and New Earswick, Heworth, Heworth without.

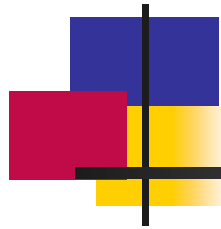
York's special Historic and Built Environment

Q10: How important is fully understanding the special character of York in informing high quality new design?

Base: all respondents who answered the question (no response = 66 of 2,250 total sample)



Around four-fifths (79%) of respondents believe that fully understanding the special character of York in informing high quality new design is 'very important'. A further 14% think it is fairly important, whilst 2% said it is 'not important'.

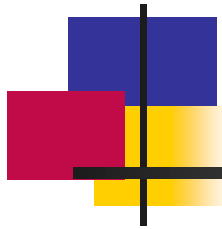


Building confident, creative and inclusive communities

Base: all respondents who answered the question (no response = 275 of 2,250 total sample)

Q11. York is in a high demand area for affordable housing and need each year is higher than the total number of houses built. The council currently negotiates with developers to provide up to 50% affordable housing on medium to large sites in the main built up area and on small to large sites in the villages. Developers say this is too high. The 50% target can be reduced if evidence is provided to show that development is not viable at this level. Should we:

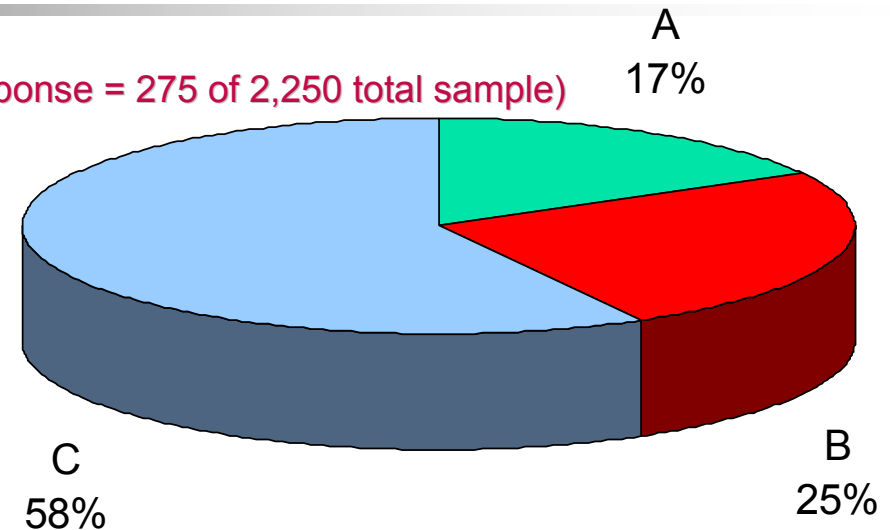
- a. continue to negotiate for up to 50% only on medium to large sites in the main built up area and on small sites in villages. On site provision would be prioritised;
 - b. require a level of affordable housing on all sites in the city, increasing from 20% (on small sites) to 50% (on large sites). In villages, continue the target of 50% on sites of two or more homes. On site provision would be prioritised;
 - c. require a level of affordable housing or equivalent financial contribution (which could, for example, be used to buy existing empty properties) in both the city and villages increasing from 10% (on small sites) to at least 40% (on large sites). Developers have an option to supply properties off site from their main development.
-



Building confident, creative and inclusive communities

Base: all respondents who answered the question (no response = 275 of 2,250 total sample)

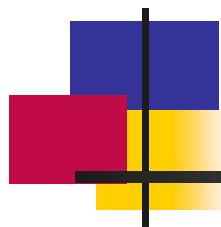
- a. continue to negotiate for up to 50% only on medium to large sites in the main built up area and on small sites in villages. On site provision would be prioritised;
- b. require a level of affordable housing on all sites in the city, increasing from 20% (on small sites) to 50% (on large sites). In villages, continue the target of 50% on sites of two or more homes. On site provision would be prioritised;
- c. require a level of affordable housing or equivalent financial contribution (which could, for example, be used to buy existing empty properties) in both the city and villages increasing from 10% (on small sites) to at least 40% (on large sites). Developers have an option to supply properties off site from their main development.



Over half (58%) of respondents think we should require a level of affordable housing or equivalent financial contribution in both the city and villages from 10% (on small sites) to at least 40% (on large sites) and that developers should have an option to supply properties off site from their main development (option c).

A quarter (25%) of the sample agree with option B, to require a level of affordable housing on all sites in the city, increasing from 20% to 50%.

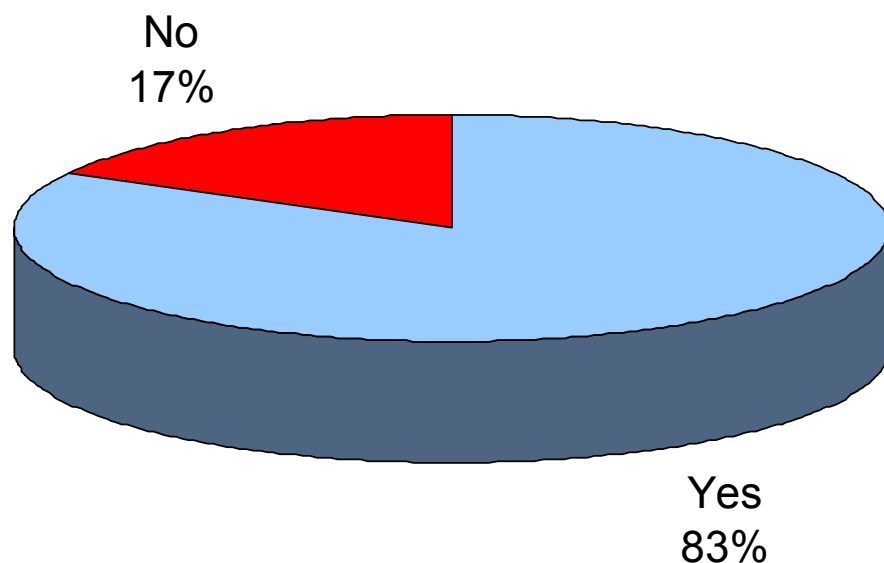
Respondents were less likely to choose option A (17%), which specifies that we should continue to negotiate for up to 50% only on medium to large sites in the main built up areas and on small sites in villages.



Building confident, creative and inclusive communities

Base: all respondents who answered the question (no response = 120 of 2,250 total sample)

Q12a A recent housing study shows that in the past we have built too many flats and not enough family houses, and that the longer term need is for two thirds houses and one third flats. The LDF is planning for a 20 year time period and demand for smaller properties may increase during this time, given the trend towards smaller family groups. Smaller properties, such as flats, would mean more homes could be accommodated within the main built up area, reducing pressure on the draft Green Belt. Do you agree that we should build more houses (around two thirds) than flats (around one third)?



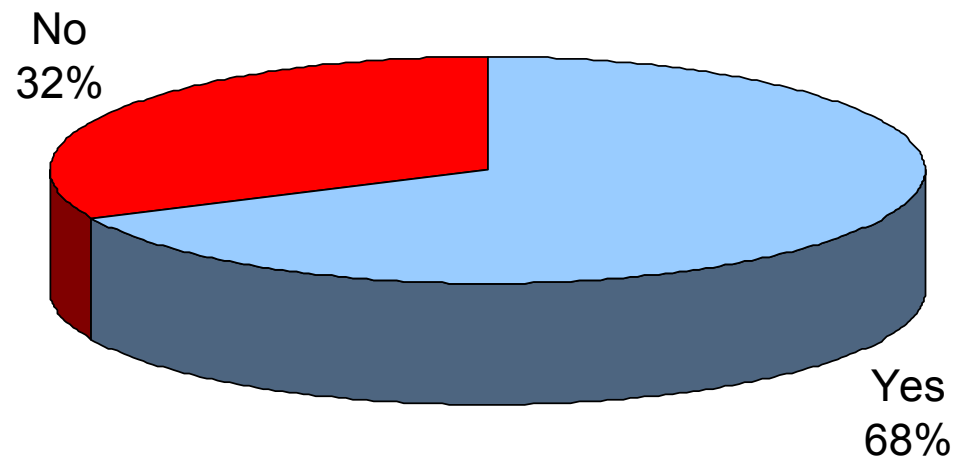
Over four-fifths (83%) of the sample agree that we should build more houses (around two thirds) than flats (around a third). 17% of respondents disagree that we should build houses rather than flats.

Building confident, creative and inclusive communities

Q12b: Do you think that this should increase to a greater number of smaller properties, such as flats, towards the end of the plan period if this reflects the changing needs of York?

Base: all respondents who answered the question (no response = 152 of 2,250 total sample)

Q12b A recent housing study shows that in the past we have built too many flats and not enough family houses, and that the longer term need is for two thirds houses and one third flats. The LDF is planning for a 20 year time period and demand for smaller properties may increase during this time, given the trend towards smaller family groups. Smaller properties, such as flats, would mean more homes could be accommodated within the main built up area, reducing pressure on the draft Green Belt. Do you think that this should increase to a greater number of smaller properties, such as flats, towards the end of the plan period if this reflects the changing needs of York?

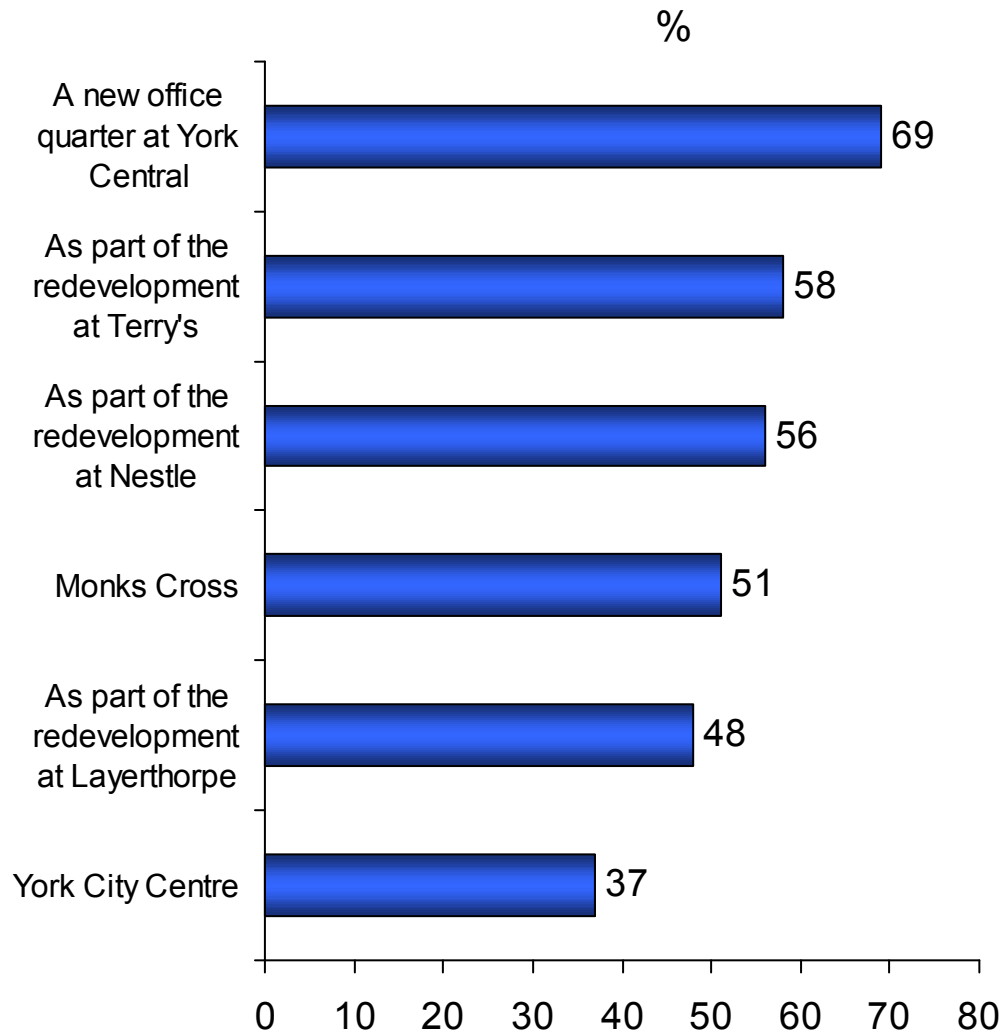


Around two-thirds (68%) of the sample agree that towards the end of the plan period there should be an increase to a greater number of smaller properties if this reflects the changing needs of York. The remaining third (32%) did not agree.

A Prosperous and Thriving Economy

Q13: Following a recent employment study, we have identified the following areas for new office development. Please tick those that you feel are appropriate.

Base: all respondents who answered the question
(no response = 145 of 2,250 total sample)



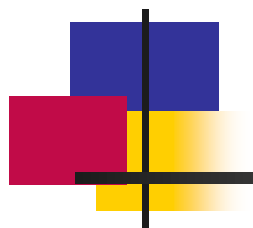
Over two-thirds (69%) of respondents agree with a new office quarter at York Central. 58% of the sample agree with office development as part of the redevelopment at Terry's, whilst 56% said as part of the redevelopment at Nestle.

Just over half (51%) of respondents think office development should be at Monks Cross, whilst 48% said as part of the redevelopment of Layerthorpe.

Respondents were least likely to agree that office development should be in York city centre (37%).

Respondents were given the opportunity to add any further comments about office development. The main comments were

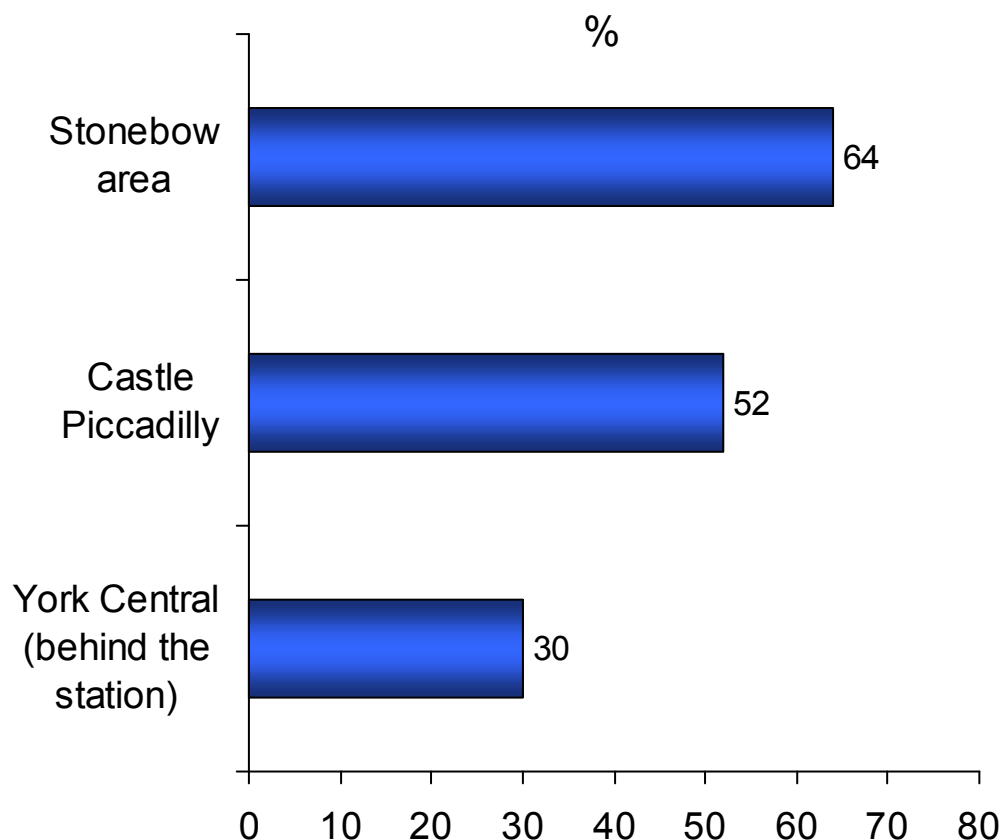
- **Ensure that there is a good public transport infrastructure.**
- **There are enough sites which should be used or redeveloped.**
- **Ensure they have car parking spaces.**



Locations for new shops

Base: all respondents who answered the question (no response = 108 of 2,250 total sample)

Q14 Whilst York city centre will remain the main focus for shopping development, there are limited opportunities to increase the number of shops. This is important in maintaining York's role as a key shopping location allowing for competition with other key shopping locations. We think that the following locations may be suitable for new shops. Which do you feel are suitable?



Nearly two-thirds (64%) of respondents think that new shops should be developed in the Stonebow area, whilst 52% said Castle Piccadilly.

Respondents were less likely to agree that new shops should be built at York Central (30%).

Respondents were also given the opportunity to suggest alternative locations, to which the main comments were:

- **Brownfield sites**
- **Hungate**
- **Monks Cross**
- **There are enough empty shops in York which should be filled first.**



District shopping centres

Q15: Do you think that there are any other district centres in York?

Base: all respondents who answered the question (no response = 1751 of 2,250 total sample)

Q15 After the city centre, two district shopping centres are currently identified at Acomb and Haxby. District centres generally serve a local neighbourhood and contain a range of shops and services such as banks, building societies and restaurants as well as local public facilities such as a library. Do you think that there are any other district centres in York?

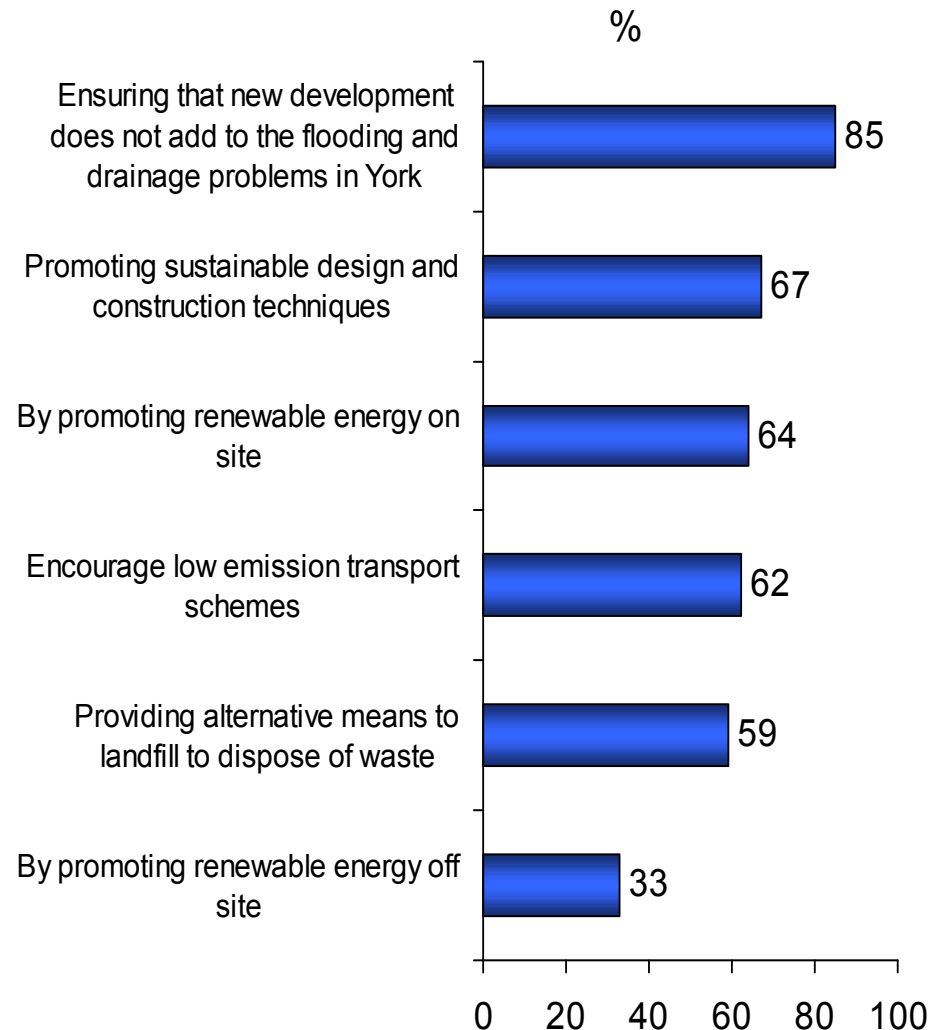
78% of respondents did not suggest any other district shopping centres in York. Of those that did the main areas were:

- **6% (n=142) Bishopthorpe Road**
 - **4% (n=88) Fulford**
 - **3% (n=59) Heslington**
 - **2% (n=55) Heworth**
 - **2% (n=44) Clifton**
 - **1% (n=30) Huntington**
 - **1% (n=25) Strensall**
 - **1% (n=23) Copmanthorpe**
-

A Leading Environmentally Friendly City

Q16: A key role of the plan (LDF) is to promote sustainable development, this includes addressing the issues of climate change. Which of the methods below, do you think will be most effective in York?

Base: all respondents who answered the question
(no response = 76 of 2,250 total sample)



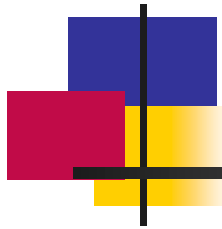
Over four-fifths (85%) of respondents think that ensuring new development does not add to the flooding and drainage problems in York will be most effective for sustainable development.

Two-thirds (67%) of the sample agree with promoting sustainable design and construction techniques, whilst 64% agree with promoting renewable energy on site.

Respondents were least likely to agree that promoting renewable energy off site will be most effective for York (33%).

‘Other’ suggestions included:

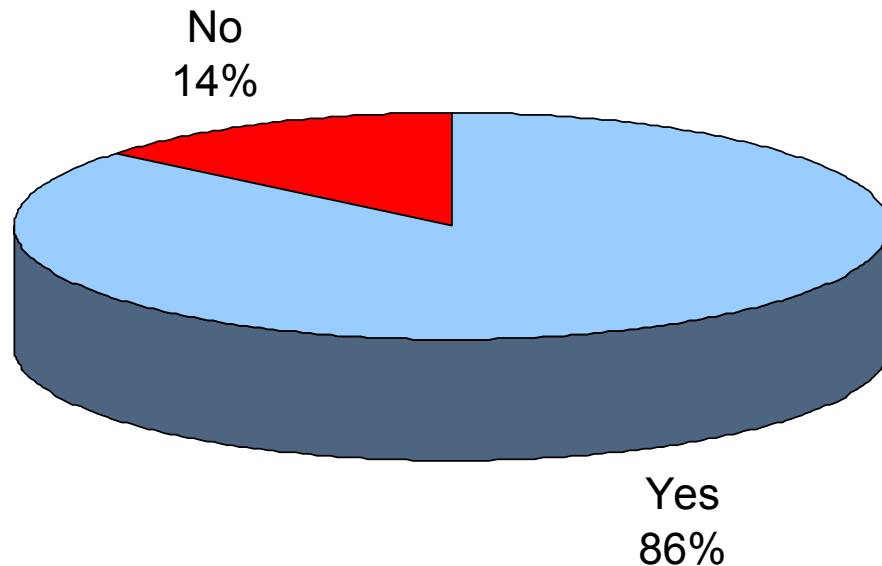
- **Ensure that there is a good provision of public transport or encourage people to use public transport.**
- **Promote recycling more and make it easier.**
- **Provide more cycle paths and cycling facilities.**
- **Reduce the use of cars.**
- **Encourage additional methods of renewable energy.**



Transport

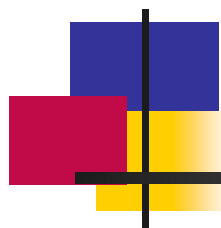
Base: all respondents who answered the question (no response = 91 of 2,250 total sample)

Q17 The approach to transport set out in the plan (LDF) aims to minimise the need to travel thereby reducing congestion and reliance on the private car. It will help achieve this through encouraging walking and cycling and the use of public transport in addition to improving access to services. Do you agree with the above approach for transport?



Over four-fifths (86%) agree with the approach for transport, which aims to encourage walking and cycling and the use of public transport as well as improving access to services.

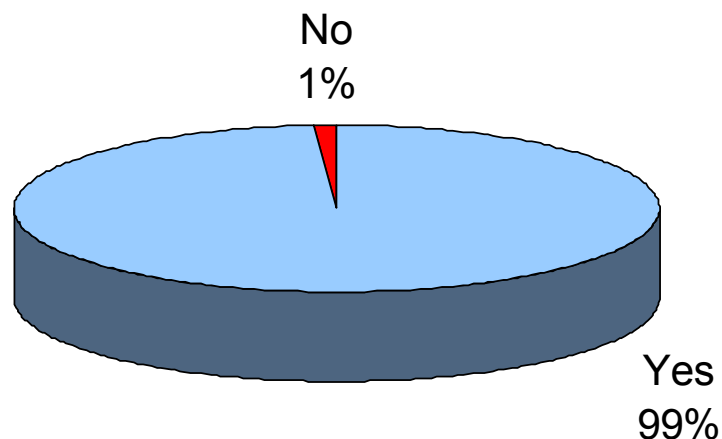
The remaining 14% of the sample did not agree with the proposed approach.



Green infrastructure

Base: all respondents who answered the question (no response = 50 of 2,250 total sample)

Q18 York's parks, open spaces, nature conservation sites, river corridors are part of the city's green infrastructure. We intend to protect and improve these existing green assets whilst also addressing 'gaps' in provision. Do you agree with this approach?



Almost all respondents (99%) who completed the survey agree with the approach to green infrastructure, which intends to protect current infrastructure whilst looking at any 'gaps' in provision.

Which parks and open spaces do you think need to be improved and where do you think new ones are needed?

Respondents were given the opportunity to suggest parks and open spaces that need improving and areas for new ones. 67% of the sample did not provide any suggestions, of those that did the main ideas were:

- Improve Rowntree Park, mainly by removing the geese.
- Improve the riverside or create more riverside paths.
- Improve Museum Gardens.
- Improve Acomb Green.
- Improve West Bank Park.
- Need a park at Castle Museum/Cliffords Tower area.
- Need more parks and open spaces in the Huntington area.



General comments

Respondents were given the opportunity to make any other comments, to which 86% did not (n=1930 of 2,250 total sample). Of the individuals who did the main comments were:

- Don't build on the Green Belt land.
 - York is big enough already or don't allow more development in York.
 - Further development should be carefully controlled to ensure it's in keeping with the character of York.
 - Reduce the volume of traffic or sort out the traffic congestion problems.
 - Public transport needs to be improved or made cheaper to encourage greater use.
 - Provide more affordable housing.
-

7. Detailed Summaries of responses to the Main Document

- 7.1 This document is a summary of the 1249 separate comments received by 117 respondents (which included a variety of individuals, groups and organisations).

General

Paragraph etc	Comments	Ref.	Name
	Need to think about how to develop document into a sound draft submission. Need to look carefully at the order of document. Core Strategy should be structured to set out a clear place based strategy with policies flowing from the vision and objectives and avoid it developing into a series of unconnected land use based parallel approaches to housing, employment, retailing etc. Like the way later chapters follow the four vision objectives, but need to think about where some of the policy areas go and make clearer linkages throughout. The document is appropriately long and detailed at this stage, but at submission it should be much briefer and give a clear message about the ways in which the area will change and avoid vague aspirations that could apply anywhere. Need to carry out rigorous editing and remove unnecessary descriptive material. Pleased to see only 17 policies in total. Need to be sure these policies are SMART. PINS consider important to have a clear audit trail explaining how core strategy has developed, what options were considered and the reason for selecting the preferred options. Particularly important in the context of decisions the Council still needs to make on the strategic choices presented in relation to Green Belt boundaries and housing location and distribution. Need to be able to demonstrate that the strategy is deliverable and show what infrastructure is necessary to support this, with some assurances from partners that there is a reasonable prospect of delivery in the required timescales and viability testing to support key policies. CABE consider that York's heritage and history are so important that they should drive the strategy and the plan should be bolder about the direction it should go by focussing on creating a new layer of development that is valued as much as the existing ones. The focus should be on delivering places not just numbers with new development, including the urban extensions, contributing to the place that York will become. There also need to be good policy hooks for the AAPs to take forward. Also felt that Green Belt has historic significance and should be treated more positively and linked to the historic driver and to the spatial strategy for the countryside and the green infrastructure.	1/7084	Government Office
	In general we welcome what is developing as clear and well thought out Core Strategy. Much of the document raises few issues of alignment with the RSS. Where there are issues, noted below, our aim is to highlight where we consider changes may be needed or more explanation required to help ensure that the next stage of preparation leads to a more straightforward document, unproblematic Examination and ultimately a sound Core Strategy. We feel that the key issues York faces are presented clearly and cover the range of challenges that we would expect to see in the Core Strategy. We also welcome the reflection of those specific issues covered in the York sub-area chapter of the RSS, such as the links to the neighbouring sub-areas.	2/	Local Government Yorkshire & the Humber

	Wish to see major housing allocations have a good quality overarching green infrastructure strategy in place in advance of detailed design work on new homes and grey infrastructure. This should include new green infrastructure assets and highly functional corridors, which link with sub regional and regional assets. Areas of Green Infrastructure opportunity and deficiency should be clearly identified. Strategies should include a costed and resourced green infrastructure programme of works to be delivered in line with new buildings, with sustainable long term funding mechanisms.	4/7140	Natural England

General continued

Paragraph etc	Comments	Ref.	Name
	Should be no adverse impact on: - biodiversity sites or species and creation of new habitats; Landscape character (positive improvement should be evident); Public Rights of Way network. Access to wider countryside should be included in Core Strategy along with policies promoting non-motorised transport. Also wish to see: - adoption of standards and approaches to achieving Green Infrastructure including ANGSt; targeting of interventions to address deprivation and lack of green space including upgrading of existing Green Infrastructure open space resources; targeting of Green Infrastructure resources and assets to include provision for people with disabilities; integration of emerging work being undertaken to map biodiversity opportunities into the plan.	4/7140	Natural England continued
	Broadly supports approach taken. Document is well set out, generally easy to read and provides a very comprehensive assessment of the key planning issues within the City. Could give additional recognition to cross boundary issues and linkages between York and the neighbouring Authorities, particularly East Riding of Yorkshire. This would fully recognise the influence of York as a Sub-Regional City. There are significant daily movements of people and trade between York and East Riding of Yorkshire. North-western part of East Riding in particular has strong links to York as shown by the travel to work and retail/leisure catchment areas. These links could be highlighted in Sections 1, 3 and 11.	17/7166	East Riding of Yorkshire Council
	In general supports proposals. Reflect role as a principal economic and service centre, but recognise that it is a source of demand for housing and other land use pressures in North Yorkshire.	18/7171	North Yorkshire County Council
	Projections and targets for the provision of housing, employment land and retail space have been taken from the RSS with input from Future York Group. In paragraph 1.12 there is a prediction that York's population will increase by 25% by 2029 and that international migration will be an important factor. In paragraph 11.11 there is a suggestion from Future York Group that York's economy should double by 2029 followed by an acknowledgement at paragraph 11.15 that recent economic downturn has had an impact on employment growth. However provision of employment land appears to be based on original projections. Concerned that planning for excessive growth will have a negative impact on wildlife sites and biodiversity in York due to increased levels of traffic, air pollution, disturbance and loss of open space. Many laudable policies on preserving green corridors, local wildlife sites and enhancing biodiversity however these policies may be impossible to implement if growth is too great.	49/7181	Yorkshire Wildlife Trust

General continued

Paragraph etc	Comments	Ref.	Name
	Agrees with and strongly supports submission made by Heslington Parish Council (ID56). Failure of university to develop workable proposals for Transit system is predictable. Implications for village of large numbers of students moving through village to get from one campus to the other without transit vehicle will create considerable problems. Village Design Statement has been a successful tool in helping to prevent inappropriate development, and in promoting better design and early consultation. It should be redesignated as soon as possible so as to become not merely SPG, but a SPD. While recognises difficulties that the City has in demanding higher environmental performance from new buildings than is required by the Building Regulations, University should be reminded that new campus was promoted as being an exemplar in terms of sustainability and low carbon buildings. It should not be allowed to drop these objectives. Problem of HMOs has been growing exponentially over the past few years, to the considerable detriment of a number of areas in York, not least Badger Hill. LDF must recognise what is now increasingly seen as a national problem, and include measures for ameliorating this problem.	53/7199	Heslington Village Trust
	A well researched and widely consulted document. While accepting that some growth is inevitable do not believe that growth figures given for city are sustainable if York is to preserve and retain its unique natural, historic and built environment. May be a case for not encouraging more jobs (except perhaps in hi-tech highly skilled science based sector), more retail outlets etc. Majority of evidence base was undertaken pre-recession. Further work needs to be done to reflect current economic climate. More should be done to improve facilities and transport problems of existing neighbourhoods, including Heslington, before new communities are considered. Development of new communities should not be detrimental to existing local neighbourhoods. Within LDF Heslington is part of Sub Regional City of York and is rarely mentioned separately in this document. Residents view Heslington Village as a village in its own right. Village Design Statement supports this. Recent Conservation Area Appraisal identifies main elements of character and appearance of area as: - The magnificence of Heslington Hall at hub of village; Way in which Heslington retains its own identity; Linear street qualities of Heslington Lane, Main Street; Charm of rural setting of south-west outer edge of Main Street. Most of areas of preferred future development currently without planning permission, and therefore subject to any adopted LDP, are less likely to impact on local area than those where planning permission has already been granted i.e. Heslington East and, to a lesser extent, Germany Beck.	56/7206	Heslington Parish Council

General continued

Paragraph etc	Comments	Ref.	Name
	LDF Leaflet - wish to understand how this will be of use given how some of questions are leading and could be highly affected by nimbyism. Also wish to understand what weight this will be given in evaluation process. Document is by nature extremely detailed, and whilst understood that LDF has to be sufficiently developed and defensible, it is quite specific. Would like to see items a little more open ended, encouraging innovation, creativity and flexibility by parties delivering facilities to meet goals and vision. Currently a number of projects underway, and whilst remote from LDF, in a number of cases, wonder if some of these could be used as a stimulus to regeneration of particular areas. Can community stadium project be located as part of York Northwest, possibly utilising existing infrastructure to kick start or at least be an ambitious gateway to North West Area? Would also be a different use and therefore beneficial to city centre scheme, make best use of train station for green agenda, and provide a vibrant, iconic gateway for visitors to York arriving by train.	57/7213	York Property Forum
	Section 7 must be moved to precede Sections 5 and 6, in order to reflect pre-eminence of this aspect, in line with consultation responses from CABE and others. Placing it elsewhere will leave Council very vulnerable at Appeal, as it will be taken that York's special historic and built environment does not warrant prime significance and importance because of its demotion from prime position in document. Further, control of this special historic and built environment must apply to all areas, not just Historic Core. Very few consequential changes would be required in text, except for minor changes to x) and xi) of 'Structure' section on page viii.	110/8293	York Civic Trust
	No comment. But Core strategies:- Need to set out vision and strategy more clearly; Too often focus on policies rather than strategy; Need to focus on how to make places work better; Lack maps, diagrams and photos to illustrate strategy, best practice or to key features of local area. Core strategies should: - Tell story; Say what is wanted; Say it clearly. See representation for more detailed general guidance.	217/7394	CABE
	Appears to be a total absence of any reference to Crime Prevention and Community Safety. Did note a single paragraph in Annex D of LDS stating that SPG is being prepared in relation to Designing out Crime. This was proposed for adoption 2007/2008 and to date, no progress has taken place in its production or adoption. This is extremely disappointing. One of key objectives of Council's Corporate Strategy is making York a safer city with low crime rates and high opinions of city's safety record. This in itself is good reason why Crime Prevention and Community Safety has to be acknowledged in Core Strategy. See representation for copy of extract from Crawley Borough Council Core Strategy Section on Community Safety.	220/7414	Safer York Partnership

General continued

Paragraph etc	Comments	Ref.	Name
	Pleased to note emphasis on need to ensure that historic environment is appropriately managed and that development strategy is delivered in a manner which ensures these assets are preserved or enhanced. Particularly welcome recognition that, in defining a Green Belt around City, may be areas where land will need to be kept undeveloped to safeguard special character and setting of York - regardless of assessed development requirements of area. However, are a number of concerns: - Does not clearly articulate what Council considers to be special qualities of York and how strategy will impact upon them; Historic environment should be starting point for Plan. York's character is its main selling point. It is reason why it gets so many visitors each year, what attracts businesses to invest in this part of sub-Region, and why people choose to live and work in City. Strategy should be to ensure that whatever happens in York, does so in a manner which not only safeguards, but also strengthens its unique environment; At RSS EiP, Panel expressed belief that, in preparing development strategy for York, was a need to undertake some assessment of environmental capacity to accommodate scales of growth being examined. None of documents currently out for consultation contain any meaningful analysis of this. Core Strategy sets out, for first time, detailed boundaries of a Green Belt whose primary purpose will be to "<i>preserve the setting and special character</i>" of historic City. Will need to show that Green Belt boundaries proposed will not only safeguard those elements which form part of York's special character and setting but, also, that those boundaries that have been defined will be likely to endure. Although makes numerous references to need to ensure that strategy for City safeguards York's "<i>special character</i>": nowhere does it clearly articulate which aspects of York are considered to contribute to this "<i>special character</i>" and what role Green Belt plays in preserving them.	242/7415	English Heritage
	Should acknowledge significance of College in terms of specialist land-based education and training. It is strategically located and a nationally and regionally important place of education and research. Site is currently identified as a major developed site in Green Belt. Planning permission has recently been granted for a major veterinary hospital and veterinary nurse training facility, which is of regional significance. Important Askham Bryan builds on its success and that College's future requirements are taken into account during preparation of LDF.	276/7436	Askham Bryan College
	Page numbers should be used in Indexes of Policies, Figures and Tables for ease of reference. Very long document and assume will be condensed and made more succinct for Submission. Structure very readable. Support layout and general content. Policies do not make spatial choices about where in broad terms large-scale development should take place.	324/7467	The Theatres Trust

General continued

Paragraph etc	Comments	Ref.	Name
	Site at New Lane, Huntington has relevance to Core Strategy in that it is currently identified as part of Protected Area of Search (Parcel A) on Key Diagram. Consider site does not meet purposes of designating land in Green Belt as set out in PPG2 and recommend site is considered at earliest possible convenience in relation to promotion of sites to accommodate required housing requirements over plan period. See representation for site-specific information.	331/7480	Taylor Wimpey (UK) Ltd
	Given special and unique features of city, argument for a bold approach to city development is compelling. Notwithstanding current issues with York Northwest, city remains a great place for people to live, work, study and visit and, should set out its stall for sustainable investment that will enhance city still further and create housing, jobs and services that city needs. York's special historic and built environment can be taken as read, but it's still possible in this context to consider such issues as: - Improving public space and the public realm; Continued drive to attract appropriate new investment; Developing evening and cultural economies of city; Extending footstreets in terms of their geographical coverage and their hours of operation; Promoting further investment in sustainable transport (not just in centre but to periphery). Welcomes: - Strong understanding of importance of tourism to economy of city, and Visit York's distinctive role in setting policy agenda for tourism; Emphasis on high quality urban design, architecture and public realm.	373/8217	Visit York
	Many positive aspects but also major fundamental flaws and contradictions. Welcome inclusion of Section on Resource Efficiency and policy context including reference to Climate Change Act 2008. Support general direction of what follows in section in terms of seeking to reduce emissions from buildings and to promote development of renewable energy. However, this policy context should head up whole of LDF, not just Section 15. Climate Change Act results from an international consensus that need to reduce greenhouse gas emissions probably by 90% by 2050 to stand a chance of avoiding a global temperature rise of over 2 degrees and catastrophic climate change. If Plan Period runs to 2030, need to look at reductions of at least 40%. As Development Plan for York for next 20 years or so should be setting out clear timescales and quantifiable targets as to how the policies in Plan are going to achieve this strategic objective. CO2 emissions come not only from buildings but also from transport, and from impact of food we eat, hence need recognised by Government to increase levels of local food production. Main driver of CO2 emissions is traditional economic growth and a policy document based on inappropriate levels and types of growth is never going to achieve overriding strategic objective of tackling climate change.	458/7539	York Green Party

General continued

Paragraph etc	Comments	Ref.	Name
	In this context continued commitment to economic growth, failure to: - identify targets or measures to reduce overall traffic levels; address issue of local food production; and put policies to reduce greenhouse gas emissions at core of document are still major deficiencies in planning for York's future. Strategic approach with clear timescales, targets and indicators to meet required CO2 emissions by end of plan period should be based on three measures: - • Target to reduce Eco-Footprint to 3.5gha by 2033 (this measures individual impact on local & global environment) and a proportionate amount by end of plan period. • A reduction in total carbon footprint by more than 40% by end of plan period (in keeping with Government targets). • Capacity Study which would complement above measures of impact on global environment with an assessment of parameters needed for York to remain an environmentally sustainable city in its locality. Impact of global resource depletion, steeply rising fuel prices and effects of climate change during plan period should also be considered.	458/7539 continued	York Green Party continued
	While there are no specific proposals for new prison development in district at present nor specific sites identified, in line with Government guidance requests that consider inclusion of a criteria based policy to deal with a firm prison proposal should it arise during plan period.	544/7538	National Offender Management Service
	Need to take a more flexible and forward looking approach to reflect Government's place making agenda so can react to changes to policy particularly within emerging Regional Policy. Should take a proactive approach and promote a sustainable pattern of development though release of sites across urban area, including larger settlements, so that needs of all parts of community are met and a sustainable balance between homes and jobs is achieved. When identifying locations for homes and jobs, opportunities to avail of existing and proposed infrastructure and spending programmes should be maximised. Aware that Council has commissioned work, which identifies which areas of land can be released from draft Green Belt to enable this pattern of development. In following this Council should then seek to define Green Belt boundaries, which will meet prescribed functions and endure beyond Plan period.	2527/7937 2528/7961 2537/7985 2688/8009	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Changing Places are toilet facilities for those whose needs are not met in a standard disabled toilet, and include a centrally placed toilet, a ceiling hoist and changing bed, as well as enough floor space for a person, a wheelchair and two carers. National guidance states there should be a changing place available roughly every 10 minutes walk. Although not always possible, essential to cater for these needs as much as possible to enable people with disabilities to access their communities and live their lives in a way those of us without a disability may take for granted. Wish to ensure that changing places remain high on agenda of any development of York as a city, particularly with importance of tourism contributing to city's economic status.	2694/8176	Valuing People Partnership Board

General continued

Paragraph etc	Comments	Ref.	Name
	Vision to “build confident, creative and inclusive communities” makes no mention of cultural activities, even though the arts are a great way to bring communities together. Also in vision to create “a prosperous and thriving economy” little mention of possible improvements to entertainment provision. One example for city centre would be to improve what at Grand Opera House York has been termed “The Riverside Quarter”. Many customers say they feel uncomfortable when coming to this part of town (also shared by Riding Lights Theatre). Side streets leading down to river and riverfront could easily become a destination in itself, and a boost to evening economy.	2695/8177	Performing Live Arts York (PLAY)

Key Diagram

Paragraph etc	Comments	Ref.	Name
	Fordlands Road neighbourhood is marked as a small village in the settlement hierarchy (Preferred Options Topic Paper 1 page 58). However, on the key diagram included within the suburban area of York. As area is washed over Green Belt, Fordlands Road area should be correctly marked as a small village. Area of Germany Beck development consists currently of agricultural fields and is still Green Belt land. Should have been fully assessed as part of Green Belt Appraisal of 2003. The fact that this land was allocated for housing at the time is not a reason to exclude it from consideration in a Green Belt Appraisal. Do not consider it correct to mark historic part of Fulford Village as suburban area of York. Further inappropriate development would be easier to resist by excluding historic part of village from suburban area. Fulford and other villages such as Heslington need to be in a special category for development control measures.	70/8193	Fulford Parish Council
	Key Diagram shows each of Persimmon land interests (other than New Lane, Huntington) as being within Green Belt and on this basis strongly objects to Key Diagram. Recommend Key Diagram be amended and exclude all of Persimmon's land interests from Green Belt. Core Strategy is an overall growth strategy and it will be for site specific allocations DPD to consider appropriateness of Green Belt sites for development. Green Belt boundaries as currently drawn will not enable Council to do this. Therefore needs to ensure flexibility to ensure this can be undertaken, otherwise it is pre-empting a decision in site allocations DPD.	161/7242	Persimmon Homes (Yorkshire)
	Note that Castle Piccadilly is shown as a site where planning permission has been granted. It is understood that this is not yet case, and therefore legend should be amended accordingly. Should also be made clear tram-train route indicated is a proposed or indicative route at this stage, until tram-train initiative has been confirmed.	214/7302 621/7348	Network Rail National Museum of Science & Industry
	Welcomes inclusion of key development opportunities and sites. These are helpful in identifying location of these sites and their relation to city and surrounding areas.	479/7723	Yorkshire Forward
	Earswick should be moved up the hierarchy to be classified as a Village.	605/8101	Mrs Barker
	Requested that extent of Green Belt shown on Key Diagram is amended to specifically exclude Harewood Whin site. This is in light of significant continued importance of site as a strategic waste management facility.	608/8284	Yorwaste Ltd

Key Diagram continued

Paragraph etc	Comments	Ref.	Name
	Support the identification and inclusion of Northminster Business Park in a Potential Area of Search for employment generating uses. Do not support 'carrying forward' of draft Local Plan allocation of land to North of Northminster Business Park as a Premier Employment location. Consider area of land should be included within Area of Search I i.e. that all of land in and around Northminster Business Park is identified as a Potential Area of Search. Support identification and inclusion of Upper and Nether Poppleton as a Local Service Centre. Support principle of provision of a new Park & Ride site on A59.	2500/7859	Northminster Properties
	Key Diagram not site specific. However diagram is clear and shows land adjacent to A1079, Grimston Bar within Green Belt. This should be amended to exclude it.	2517/7895	Lands Improvement
	Number of changes need to be made to Key Diagram so that diagram is better informed and more accurate. Other preferred areas of search should be identified for housing, including part of E, an expanded areas F (Knaption) and G (Haxby), along with land at Lords Moor Lane Strensall. Development should be distributed across City to a number of sites to ensure that enough land is identified to meet future requirements so that benefits associated with development are distributed equitably. Query whether A66 is routed to east of York.	2527/7960 2528/7984 2537/8008 2688/8032	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family Barstow Esq.
	Area of Search D (South of Moor Lane, Woodthorpe) should be acknowledged on Key Diagram as a Potential Area of Search to enable full assessment of viable options.	2542/8044	Moor Lane Consortium
	Support identification and inclusion of land to East of Metcalfe Lane, Osbaldwick in a Potential Area of Search for future housing development.	2685/8106	Mr F R Pulleyn

Section 1: Background

Paragraph etc	Comments	Ref.	Name
General			
	Whilst projections must align with RSS targets, as IRS will replace RSS within two years, earlier comments querying RSS assumptions should be taken into account at this stage. Predicted increase in population is far greater than existing combined population of all non-urban settlements within Greater York. Such an increase over such a short period will impose an intolerable burden on infrastructure, social cohesion and natural environment. Growth estimate appears to be based on past trends and does not accord with RSS housing targets, which are more modest. Any measures, which encourage population growth beyond York's environmental capacity, cannot be supported. RSS targets indicate an additional 13,442 homes must be provided by 2030. Current rate of occupancy is 2.3 people per unit. If additional 52,200 people were to be accommodated at an anticipated 2.2 people per unit, this would require provision of 23,727 units, an excess over target of 10,285 units. LDF is already suggesting Green Belt land will be needed to meet original targets. The "unadopted" Future York report recommends that economy be doubled in value by 2026. If this implies a large commuting workforce and/or a massive increase in resident employees, with a huge increase in amount of floor space required, then its effects would be widespread and damaging. Suggested concentration on knowledge-led and financial and professional services would lead to an imbalance of employment opportunities, which could leave many local citizens at a disadvantage. To develop high value-added enterprises with an indigenous workforce requiring a minimal increase in floor space would seem to be a logical way forward. LTP identifies traffic congestion as single most important issue facing City, with commuting forecast to grow as a result of continued development to meet housing need and economic potential. Unless problems of population and economic growth are resolved traffic difficulties will never be overcome in a cost-effective and sustainable way. No mention of carbon footprint or climate change. As every policy involves consideration of these concepts, LDF should be introduced with a "Mission Statement" dealing with this, and confirming a commitment to a radical shift in attitude to development. Relegating these issues to Section 2 indicates these are not rated as being of fundamental importance.	52/8324	York Environment Forum
	Links between Core Strategy and regional policy should be strengthened when explaining background. Would help readers to develop a fuller appreciation of how plan relates to wider policy framework for region.	479/7726	Yorkshire Forward
Policy Influences - Regional Policy Influences			
General	Recognition of strategic role of York as a sub-regional city and important role it plays within Leeds City Region is welcomed.	479/7724	Yorkshire Forward

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Policy Influences - Regional Policy Influences continued			
Paragraph 1.4 - 1.5	Supports recognition that an important role of York's LDF is to aid delivery of RSS. Further supports need to further develop York as a Sub-Regional City by ensuring continued economic success, which includes need to deliver future levels of housing growth set out in RSS	161/7227	Persimmon Homes (Yorkshire)
Paragraph 1.4 - 1.6	Levels of growth predicted at height of the growth bubble in 2007 that have informed RSS figures are unrealistic in current financial climate. Even though recession will end during the lifetime of the LDF, projected figures are likely to lead to unsustainable growth up to 2026. Should argue for lowering these levels at IRS stage.	70/8194	Fulford Parish Council
	Current predictions of growth are unsustainable and unrealistic. Object to LDF based on regional targets, which are out-dated and may damage environment, community cohesion, and special character of York, which underpins our tourism industry and enhances York as an attractive business location. Environmental Capacity Study must be undertaken to establish an appropriate evidence base. This key bit of evidence is currently missing to inform LDF.	458/7540	York Green Party
Paragraph 1.6	Supports recognition that IRS could mean changes to regional housing figures which will impact on York's future housing growth. Believes that need to plan as a minimum those figures outlined in the current adopted RSS.	161/7228	Persimmon Homes (Yorkshire)
	Support. Housing figures Council are using are not high enough and as such are not properly planning for anticipated growth that York is likely to need in next plan period. Need for flexibility in Core Strategy to ensure it can meet requirements of PPS12. Need to be planning as a minimum those figures outlined in current adopted RSS to ensure there is enough land, hence a "rolling supply" of land to accommodate York's housing and development needs.	2517/7881	Lands Improvement
Policy Influences - Local Policy Influences			
Paragraph 1.8	Seven points could be supplemented by one recognising provision of high quality housing to meet housing needs is an important strategic ambition. After 3 add a new point 4: - "Provide the homes required to meet the needs and aspirations of a growing and ageing population".	2523/7913	Grantside Ltd
Issues, Challenges & Opportunities - Geography			
Paragraph 1.9	Supports approach. A similar approach to development should take place in City's smaller settlement. Where small-scale settlement extensions are required, this should be in locations, which respect existing character of settlement, whilst limiting potential for coalescence.	161/7229	Persimmon Homes (Yorkshire)
Figure 2	Could usefully show East Riding's Principal Towns of Beverley, Bridlington, Driffield and Goole and the route of the A166 (York - Stamford Bridge Driffield and Bridlington via the A614). Also incorrectly shows route of A1079 as following route of A1034 from Market Weighton to A63 at South Cave. From Market Weighton A1079 continues to Hull via Beverley.	17/7168	East Riding of Yorkshire Council

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Issues, Challenges & Opportunities – Geography continued			
Figure 2 continued	Unclear how extent of influence of Leeds and York has been defined. Would be more appropriate to use general boundaries developed through RSS and Northern Way Growth Strategy. Would also be helpful if key economic linkages within sub-region were highlighted in figure - particularly those between York and Harrogate, Selby and Malton/Norton.	479/7725	Yorkshire Forward
Issues, Challenges & Opportunities – Population			
Paragraph 1.12	25% increase presents a challenge: how York retains its special identity and attraction.	203/7301	Ms J Hopton
	Would be detrimental to needs of residents if LDF provided groundwork for an unsustainable 25% growth in population by 2029. Would damage environment, create less community cohesion, and damage special character of city. While sensible to plan in light of population trends, does not mean should encourage those trends by following a path of unsustainable population growth.	458/7541	York Green Party
Issues, Challenges & Opportunities - York's Unique Historic Built Environment			
Paragraph 1.13	Mention should also be made of numerous other elements of historic environment, which contribute to distinctive character. These include: - Legacy of buildings and areas associated with chocolate manufacturing; Buildings and structures associated with railway heritage; Historic routes into City.	242/7416	English Heritage
Paragraph 1.16	Challenge is not simply to protect and enhance wealth of historic assets but also to explore how it might be better utilised to deliver wider objectives for City.	242/7417	English Heritage
	No recognition that to protect and enhance city's historical legacy it will be necessary to deliver appropriate development that is sensitively designed. This is likely to necessitate lower densities within/adjacent to sensitive locations. Not adequately considered within consideration of target densities and consequent delivery. Following text should be added at end of paragraph "whilst achieving an appropriate density and form of development in the city."	2542/8045	Moor Lane Consortium
Issues, Challenges & Opportunities - Ecological Footprint			
General	Too one sided and pessimistic in tone and needs better balance. In describing potential impact of growth and consumption it ignores other side of equation: the enhanced human productivity that comes from consumption of resources. Greater development drives freedom. Allowing for York's growth will help meet people's housing requirements and assist economic expansion. Will also help to provide employment, improve living standards and widen revenue base, which will help fund infrastructure improvements.	165/7266	Home Builders Federation
Paragraph 1.17 - 1.18	Strongly support inclusion of Eco-Footprint principle. Importance of this type of measure throughout document should be higher. A clear target should be included in keeping with 3.5gha by 2033 in Community Strategy.	458/7542	York Green Party

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Issues, Challenges & Opportunities - Employment			
Paragraph 1.19	Refers to significant employment in chocolate and railways. Higher and Further Education employment levels would be comparable to these sectors,	190/8274	University of York
Paragraph 1.20	Consider recommendation to double value of York's economy by 2026 ludicrous.	70/8195	Fulford Parish Council
	Disagree with recommendation of doubling economic growth. Question status of 'Future York Report' as part of evidence base. Large proportion of people involved in production of report represent organisations which own development land in city and therefore have a vested interest in its recommendations. Does not represent independent view. Contains scarcely any reference to environmental sustainability, which puts it at odds with spatial strategy objectives. As a report from a particular point of view on York's economy, at best could be seen as part of list of documents related to evidence base for LDF, but should not really be included at all. However, fact this has been commissioned to provide a point of view based on prioritising economic growth only adds to argument for an Environmental Capacity Study to be added to the evidence base to provide a more balanced overall perspective.	458/7543	York Green Party
Paragraph 1.22	Support assessment that tourism is an important part of York's economy and is here to stay. Preservation of historic environment and maintaining local distinctiveness are key to retaining quality tourism. Tourists will not come to York if allow development to make it a clone of every other town and city. Should be developing a 'Sustainable Tourism Strategy' focused on attracting regional and UK based visitors especially by rail, rather than promoting international tourism which depends largely on high volume air travel and is totally at odds with a carbon reduction strategy.	458/7544	York Green Party
	Important that City has sufficient hotel provision and in sustainable locations to maintain and enhance its role as a premier visitor destination. Location such as land adjacent to A1079, at Grimston Bar would be suitable, particularly given its proximity to A1079 and Park and Ride. Recommend adding to last sentence: -"and seeks to ensure that sufficient service provision, such as hotels that supports this role are encouraged in suitable and sustainable locations".	2517/7882	Lands Improvement
Issues, Challenges & Opportunities - Housing			
Paragraph 1.23	Supports acknowledgement that key challenge is to deliver overall amount of housing highlighted in RSS and right type and mix of housing to meet City's needs. Apartments have dominated housing provision over previous years.	161/7230	Persimmon Homes (Yorkshire)
	Demands of RSS are based on assumption that York will pursue policies, which prioritise economic growth and attract significant levels of additional employment and employees into city. This is a policy choice, which leads to unsustainable demand for both employment land and housing. Object to levels of growth, which are beyond capacity for York to absorb.	458/7545	York Green Party

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Issues, Challenges & Opportunities – Housing continued			
Paragraph 1.23 - 1.26	These challenges should not be under estimated particularly as delivery is central. Relies upon a number of major sites, which over a period of time may well deliver a proportion of City's housing and wider development needs. Many of these sites have delivered little or no development to date. Suggests that undue reliance on singular large sites is not a sustainable option to deliver growth, over short and medium term of plan. Even in latter period of plan, such large sites will have limitations on eventual build and sales rates. A more dispersed strategy, focusing on allocation of a series of smaller and medium sized sites, in addition to major strategic sites will assist in delivery of housing; a critical challenge for the plan.	546/7697 2510/7870	Miller Homes Ltd Taylor Wimpey UK Ltd
Paragraph 1.24	Council should lobby central government for policy changes such as taxing land banking by developers and increasing social housing grant. Councils should be allowed to spend up to 100% of receipts directly on provision of affordable housing. Development of appropriate small sites with 100% affordable housing should be encouraged.	458/7546	York Green Party
	Support identification in SHMA of a significant housing need, which is in excess of York's annual provision. However, housing targets do not go far enough to meet identified need. Will need to promote an increased housing allocation in IRS to meet this.	2542/8046	Moor Lane Consortium
Paragraph 1.25	Agrees that the type of housing is an issue for York. Given need to deliver more houses, in response to RSS and ONS projections, this raises land supply issues for City. Current emerging Core Strategy is based on: - Out of date demographic information; A lack of consideration of land supply for delivering more houses than flats; Failure to release land currently allocated as Green Belt in the Draft City of York Local Plan to ensure there is a rolling supply of deliverable land to meet its development needs in emerging plan period. Need to acknowledge that land currently identified as Green Belt in Draft City of York Local Plan will be required to deliver its household projections. Future housing land should be situated in sustainable locations, which can aid development of York as a Sub-Regional City by ensuring continued economic success.	161/7231	Persimmon Homes (Yorkshire)
	Support shift to emphasise need for more family homes and houses as opposed to flats and sympathise with objective to achieve benefits of less dense development, especially in city centre. Must be recognised this impacts adversely on targets expressed simply as number of dwellings rather than bedrooms or population size.	458/7547	York Green Party

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Issues, Challenges & Opportunities – Housing continued			
Paragraph 1.25 continued	Given need to deliver more houses, raises land supply issues for City. Council's current emerging strategy is based on: - out of date demographic information; a lack of consideration of land supply for delivering more houses than flats; failure to release land currently allocated as Green Belt to ensure there is a rolling supply of deliverable land to meet development needs in emerging plan period. Need to acknowledge land currently identified, as Green Belt will be required to deliver household projections. This land should be in sustainable locations, in close proximity to public transport, (e.g. Park and Ride) and "deliverable". Includes land adjacent to A1079 at Grimston Bar.	2517/7883	Lands Improvement
	Support recognition that two thirds of demand is for housing and one third for flats. Failure to achieve this mix on brownfield sites will result in an over supply of flats. Delivery of houses needs to be achieved from outset of plan period. Exclusive focus on brownfield sites to 2021/2022 is unlikely to supply this during this part of plan period. Brownfield sites can be limited in ability to deliver houses due to existing permissions for other uses or flatted development, development value of providing townhouses on urban sites, need for sites to accommodate other uses, suitability/competition to accommodate other uses and need to address contamination issues in association with private gardens. Greenfield sites will need to come forward at start of plan period to ensure that houses are delivered, and above balance is achieved, throughout plan period.	2542/8047	Moor Lane Consortium
Issues, Challenges & Opportunities - Retail, Leisure and Open Space			
Paragraph 1.27	Support, especially reference to independent local shops. Note: Three cinemas now functioning in York (correction).	458/7548	York Green Party
Paragraph 1.28	Support enhancement, investment and support of District, Village and Suburban shops. Should be greater emphasis on contribution these make to quality of life and reduced need to travel.	458/7549	York Green Party
Paragraph 1.29 - 1.30	Challenge validity of Retail Study 2008 as part of evidence base. York, Leeds and Hull each have their own unique selling points and no logical reason for York to seek to be same as others. Tourists do not come to York to visit same chain stores they can visit in own city centre.	458/7550	York Green Party
Paragraph 1.30	Final sentence does not accurately reflect findings of Retail Study and should be amended by deleting reference to Monks Cross, as no evidence to substantiate this statement.	370/7483	Trustees for Monks Cross Shopping Park
	Council has opportunity to turn Monks Cross into a 'District Centre' by creating more new homes in that area thereby reducing car journeys.	2689/8132	Monks Cross North Consortium
Paragraph 1.31	Agree is shortfall in provision of sports and leisure facilities. Barbican could be re-opened to address this and University Pool must be brought forward in time or abandoned in favour of a city centre pool. Community stadium would be best placed at York Central for access by public transport, particularly by visiting fans.	458/7551	York Green Party

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Issues, Challenges & Opportunities - Retail, Leisure and Open Space continued			
Paragraph 1.31 continued	Note need for a new Community Stadium. Land in Monks Cross Area could assist as part of a larger mixed-use proposal.	2689/8133	Monks Cross North Consortium
Paragraph 1.32	Should include mention of public access to historic Strays. Support recognition of slight shortfall of provision of certain types of open space. Recommend greater emphasis and provision be made for allotments to help reduce reliance on imported food and reduce food miles. Conversion of Castle Car Park to public open space would present a better setting for Clifford's Tower and increase visitor numbers at Castle Museum as well as adding to quality of life of residents.	458/7552	York Green Party
Issues, Challenges & Opportunities - Higher and Further Education			
Paragraph 1.33	Disappointed that emphasis appears to be on the expansion plans for York University. Important to note that York St John University continues to consider its estate strategy and opportunities in context of needing to provide state of the art teaching and learning facilities and accommodate growing student numbers. Also links to Policy CS8.	45/7176	York St John University
	Recognition of economic benefits that continued success of higher education brings to area and specific reference to Askham Bryan College supported.	276/7437	Askham Bryan College
	While these institutions perform a vital role in terms of education and in employment, effect of expansion and expected growth in student numbers has great significance for LDF. Concerns over 'studentification' of areas, creating Ghost Towns in summer months, reducing sense of community, and encouraging aspects of crime such as burglary. University of York is failing to build sufficient student housing on campus. Family homes are being converted to student housing to compensate, adding to housing deficit. Measures must be drawn up in LDF to control growth and management of multi-occupancy housing in predominantly student areas.	458/7553	York Green Party
	Support.	2517/7884	Lands Improvement
	Should mention expansion and investment at York College providing state of art facilities.	2686/8114	Higher York
	Need to promote additional research on student housing to ensure students are fully catered for as part of housing land work. These numbers are over and above housing requirement in RSS.	2689/8134	Monks Cross North Consortium
Issues, Challenges & Opportunities – Transport			
Paragraph 1.35 - 1.36	Support paragraphs. Strategic objective should be to bring levels of employment and housing in city (including sufficient affordable housing) as close to each other as possible within capacity limits as identified in an Environmental Capacity Study. Reference should be made here to challenge faced in complying with health based legal limits to air pollution created by road traffic.	458/7554	York Green Party

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Issues, Challenges & Opportunities – Transport continued			
Paragraph 1.35 - 1.36 continued	Moor Lane (Area of Search D) should be supported ahead of/alongside A and B. Provides a location accessible by range of sustainable modes, particularly public transport assisting in minimising private car trips. Whilst York experiences a net inward flow of trips to work, location of A and B, will increase proportion of journey to work trips generated within York resulting in a greater impact on road network than Moor Lane, which is predicted to generate a greater proportion of trips outside area. A and B are more likely to concentrate combined impact of sites on surrounding network. Moor Lane is remote from A and B and therefore combined impact of this with either of these sites would be less than combined impact of sites A and B together. A full assessment of cumulative impacts on existing transport network of concentrating urban extensions to east of city needs to be undertaken to demonstrate whether location is most sustainable option or whether other locations would be more sustainable. Following text should be added to end of paragraph 1.36 “Work will need to be undertaken to assess the cumulative impacts of the preferred Areas of Search to the east of the city on the existing highway network.” Paragraph should also recognise how better balance of housing and employment can reduce need for trips to work by car and reduce level of in/out commuting.	2542/8048	Moor Lane Consortium
Issues, Challenges & Opportunities - Waste and Minerals			
Paragraph 1.37	Considerable progress has been made in establishing waste management schemes but provision for large-scale composting facilities may be required. Would object to any plans to specify a site for waste incineration (or ‘Energy from Waste’) in LDF. Waste strategy also pays insufficient attention to commercial and Construction and Demolition waste, which between them account for over 90% by weight of all waste in UK.	458/7555	York Green Party
Question 1			
	Welcomes detail in section. Encourage strong focus on quality of residents’ living environment. Encourage cross cutting theme of Environmental Sustainability, which prioritises efficient use of land, green infrastructure, habitat, health, landscape and climatic benefits.	4/7121	Natural England
	Support protection of Green Corridors. Seen as contribution to preventing habitat fragmentation, and helping to mitigate for climate change by allowing species to move to new areas. Managing Green Infrastructure in future will be vital to maintaining value for biodiversity. Green wedges and Green Infrastructure are valuable and provide permeability of city to wildlife. Protection and adequate resourcing of management of these is vital. Could increase biodiversity of parks and amenity open spaces by assessing how management could be changed e.g. amount of wild flowers in grassland could be increased, or hedges could provide better nesting opportunities. Contributions from developers to manage and enhance Green Infrastructure should be sought. Welcomes Ecological foot print approach to measuring sustainability of developments.	49/7182	Yorkshire Wildlife Trust

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Question 1 continued			
	One important consideration missed out from policy influences - realisation that York cannot be expanded boundlessly without damage to its special character and unique green setting and that there is a need for an environmental capacity study. Should finally commission an environmental capacity study as advocated by English Heritage, York Environment Trust and several other institutions and groups. York cannot be a key driver in the regional economy with its projected economic growth whilst protecting the unique built and natural form at the same time. LDF should specify what is most important to York's identity and resist even higher economic and housing targets being imposed at a regional or national level.	70/8196	Fulford Parish Council
	'Housing' text should be expanded to make clear that RSS housing figures are minimum requirements and that LDF will make provision for at least the level of homes required by RSS. Needs to refer back to population projections [para 1.12] to make clear there is a need for more houses than an additional 850 units per year to 2026. Will help provide more accurate reflection of how York might change in future and set context for policy framework in Core Strategy.	164/7251	Hogg Builders (York) Ltd
	In principle general issues have been covered and this is a fair representation of York.	198/7279	The Helmsley Group
	Regional policy influences specifically adopted RSS and emerging RSS review, should form a greater part of this section. Currently insufficient commentary on RSS. The way in which York may change is governed by regional policy, therefore consider that the three paragraphs (1.4 – 1.6) currently devoted to adopted and emerging RSS need expanding. May be more appropriate to make stronger reference to relevant parts of RSS policy within each specific topic area discussed. Without being firmly anchored in context of RSS policy, does not provide an adequate indication of how York may change in future, having regard to all topic areas covered. Within "Retail, Leisure and Open Space" paragraphs, retail commentary should be set in context of Council's LDF evidence base, namely 2008 Retail Study, as this will provide evidence to help shape retail policy within City going forward. Retail Study states Council should consider policy options for retail development beyond City Centre on York Central. Paragraph 1.29 confirms York has a number of out of centre retail destinations, which perform a sub-regional role. Important to emphasise another recommendation in Retail Study re out of centre retail destinations, namely that Council should not designate existing out of centre shopping facilities within retail hierarchy. PPS6 does not impose an embargo on out of centre development, but advocates a sequential approach to site selection with preference for locations within or failing that on edge of existing centres. In York, 2008 Retail Study identifies that with exception of Castle Piccadilly, only site able to accommodate large-scale retail development is York Central.	214/7303 621/7349	Network Rail National Museum of Science & Industry
	Agree with approach. 1.24 is key issue. Need to ensure affordable housing is made available.	218/7395	Northern Gas Networks

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Question 1 continued			
	Supports strategic ambitions of City. Pleased to note paragraphs 1.33 and 1.34 acknowledge importance of education institutions in city and in particular requirement for expansion of further education premises following changes to national education policy. Background fails to address fact that if College's ambitions are to be delivered, one of key challenges will be pressure to develop in Green Belt. Needs to acknowledge and deal with positively. A section under "Issues, Challenges and Opportunities" needs to outline history of Green Belt, its role, extent and response to increasing pressure for economic development in city. Needs to acknowledge that, whilst there may be a preference for developing brownfield land first, to achieve sustainable economic development in city, consideration needs to be given to Green Belt release.	282/7443	York College
	No strategy for developing or enhancing links to local rural economy is mentioned. Given that both food and transport real-terms costs are likely to rise, and become more volatile, within timeframe of strategy, this is a serious shortcoming. Although provision of housing, leisure and transport is dealt with, no mention is made of any allocation of space for provision of food. Given likely increases in transport costs, as well as those of conventional farming, taking for granted provision of food could be a serious oversight. LDF should make specific provisions in its spatial strategy and elsewhere for protection of agricultural land within Plan boundaries. Development of biofuel energy will impact on ability to provide enough food locally and nationally in longer term. Plan should make reference to small scale renewable energy facilities (wind, solar) being acceptable land use in rural areas including Green Belt where it does not compromise key views of Minster.	458/7556	York Green Party
	Need to ensure all developments are developed so that environmental issues, including noise, light odour and dust are suitably considered. Local air quality needs to be raised as a specific issue and challenge. No mention of existence of Air Quality Management Area (AQMA) or adverse impact poor air quality has on both public health and historic buildings. At present only mentioned briefly in transport section. No explanation of geographical extent of air quality problems or health based reasons for AQMA declaration. Although traffic congestion is a large part of problem it is not only factor giving rise to air quality problems. New development also has potential to increase emissions of nitrogen dioxide and particulate from buildings. It is a growing issue in York due to increasing popularity of biomass burners as a way of meeting sustainable fuel use targets. Although biomass burners offer considerable savings in terms of carbon dioxide emissions can give rise to significant increases in emissions of nitrogen dioxide and particulate, particularly where they replace natural gas plant.	2291/7811	CYC Environmental Protection Unit

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Question 1 continued			
	Local air quality issues could be better represented as follows: - Local air quality dealt with as a separate heading under Issues, Challenges and Opportunities; Inclusion of a brief explanation of reasons for AQMA (possibly including a map) and a discussion of impacts of poor air quality on health and built environment; A better description of the causes of poor air quality, including more emphasis on development related issues such as increased trip generation, cumulative building emissions and choice of fuels. To achieve a real improvement in air quality within AQMA a holistic approach to emission control needs to be taken across city. This could be achieved through development of a Low Emission Strategy (LES). This would help consolidate climate change and local air quality policies and allow the setting of achievable emissions reduction targets. With a LES in place aim would be to ensure that on brownfield sites new development would give rise to less emissions than previous uses. On green field sites aim would be to keep new emissions to an absolute minimum through use of low emission technology and emissions based parking controls. In cases where an increase in emissions could not be avoided developers would be required to undertake mitigation measures to offset increase in emissions and/or contribute financially to a central 'low emission fund'. (See Representation for details of measures, which could be supported). Due to dynamic nature of local air pollutants, and global impacts of carbon dioxide emissions, LES would need to be applied across a wide extent of area, not just in and around AQMA. Core Strategy should recognise and support development of a LES.	2291/7811 continued	CYC Environmental Protection Unit continued
	Request that following statement be included in LDF document: - Network Description Within the City of York district there is one section of the Strategic Road Network (SRN) managed by the Highways Agency on behalf of the Secretary of State for Transport. This is the A64(T), an all-purpose trunk road, comprising the southern and eastern sections of York Bypass. These sections of the bypass have dual two lane carriageways with grade-separated junctions except for the eastern end, at Hopgrove, which has two at grade roundabout where the bypass meets York Outer Ring Road. There are no frontage development accesses to the bypass, all accesses to adjacent land is gained via the grade separated junctions and local highway network. To west of district the A64(T) connects with the A1(M) and the national strategic motorway network. To the north-east of Hopgrove roundabout the A64(T) is a single carriageway road connecting with the market town of Malton and the coastal resort town of Scarborough.	2434/7840	Highways Agency

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Question 1 continued			
	Operational Conditions The A64 (T) acts as a commuter route between York and the towns and villages beyond and the West Yorkshire urban centres. Thus there is a predominant traffic flow in the westbound direction in the morning peak and eastbound in the evening peak. At present there are weekday peak period traffic congestion problems at some junctions of the A64 with the local road network, principally the junctions with: - A19 south of Fulford; A1079 at Grimston Bar, and A1237 (Outer Ring Road) at Hopgrove. These problems can affect the journey times of both through traffic and locally generated and attracted traffic during peak periods using both the SRN and the local highway network. In addition the A64(T) is subjected to a considerable amount of leisure traffic, as it is a route from the urban conurbations of south and west Yorkshire to the Yorkshire coastal towns and North York Moors National Park. This can result in a considerable variation in traffic demand levels, particularly at weekends and on bank holidays. At times these demands result in traffic congestion on the mainline carriageway in the eastbound direction during morning periods and westbound in the evenings. The Hopgrove roundabout is a particular constraint at such times. Traffic congestion also occurs on the A64 (T) and its junctions as a result of the more-popular race meetings at York Racecourse. Proposed Network Enhancements The Highways Agency has no proposals for capacity enhancements to the A64(T) main line but work has started on a proposal to modify two A64(T) / A1237 Outer Ring Road / A1036 Malton Road roundabouts at Hopgrove, where the current capacity and safety problems will be addressed by remodelling the layout of the roundabouts with the introduction of traffic signal control and associated widening, lining and signing works. There are already proposals aimed at tackling some of the traffic problems at the A1079 Grimston Bar junction under obligations for development with an extant planning consent. A developer should not assume that those obligations will also mitigate other new development proposals within the vicinity of the junction, or that those obligations will be in place before new development proposals are implemented.	2434/7840 continued	Highways Agency continued
	Housing text should be expanded to make clear that RSS figures are minimum requirements and that LDF will make provision for at least level of homes required by RSS. Needs to refer back to population projections to make clear there is a need for more houses than an additional 850 units per year to 2026 based on projected population for York. Will help provide a more accurate reflection of how York might change in future and set context for policy framework.	2524/7922	Barratt Homes (York) Ltd

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Question 1 continued			
	Assessment is let down by failure to address or even mention issue of utilities; their capacity or possible problems created by future development pressures. Disappointed at limited recognition for transport infrastructure in particular important role of Outer Ring Road, which strategically is most significant artery for city. Also consider weight should be given to possible demand reducing measures such as park and ride and rail, both of which have and will continue to be a focus for investment and improvement.	2527/7938 2528/7962 2537/7986 2688/8010	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family Barstow Esq.
	Another issue that should be covered in "York's Unique Historic Built Environment" is need to achieve a balance between delivering an appropriate density of development in city and preserving historic environment.	2542/8049	Moor Lane Consortium
	To meet target figures, new homes must be built and must be located somewhere. Through reviewing Green Belt, parcels of land, which do not meet PPG 2 criteria will be highlighted, and could generate areas of land suitable for housing, as they are sustainable, with good access links and close to residential areas. Site at Tadcaster Road is ideally located for housing as is sustainable with good public transport access, is located within a residential area, and would provide a logical boundary to Green Belt/residential area. Parcels of land that do not meet Green Belt criteria should be released to meet needs of future, especially in relation to housing.	2576/8095	The Wilberforce Trust
	Would be good to see link that could be made between other developments such as housing and other construction, environmental strategies, linked to Higher Education and Further Education. LDF must support facilitation of developments having real benefit of those in learning e.g. new construction sites - companies to show how will support Apprenticeships, work experience for 14-19 year olds, undergraduate and graduate internships. Public procurement and planning procedures should be updated to reflect this. Overall issues seem to be right choices but reads very much as though these operate in silos. Should be more links generally to reflect how all this meshes together.	2686/8115	Higher York
	Welcome strong reference to RSS. While aware that RSS Review has been put on hold in favour of progressing IRS, important to recognise that much of base data used to formulate requirements of RSS are now out of date. In particular, more recent household formation forecasts suggest rates for York are in order of 1,400 per annum, a figure well above that contained in RSS and Core Strategy. RSS housing figure for York should be regarded as an absolute minimum and not to be considered as a ceiling.	2689/8135	Monks Cross North Consortium

Section 1: Background continued

Paragraph etc	Comments	Ref.	Name
Question 1 continued			
	Reference should be included to reflect fact that York has not got an adopted Green Belt and that, to accommodate projected growth requirements, changes to interim Green Belt boundaries will be required. A further factor that should be referred to is issue of flooding and its impact on York along with issues of setting and historic form created by strays and green wedges which should be protected. The issues of population, housing and household projections coupled with economic growth will each form important elements in preparation of Core Strategy. If any or all of these factors are under-stated there will be an danger of under performance in all areas created by setting of inadequate requirements and targets. Increase in population combined with projections relating to demographics of age profile and single person households represents a significant requirement for additional housing stock. Existing housing needs identified by SHMA is well in excess of overall annual new housing provision. Suggests already an existing underlying unsatisfied housing demand, which will only be exacerbated by future under provision. Housing problems also compounded by a higher proportion of historic supply being flats not sought by population and an undersupply of houses that are in demand. Note that main supply of actual houses, in terms of current commitments are at Germany Beck and Metcalfe Lane both of which were granted following a planning appeal. Important that LDF can deliver what is required through a properly planned approach and that Core Strategy lays an adequate foundation to achieve this. The Issues, Challenges and Opportunities should set scene more comprehensively by including these matters.	2698/8227	Commercial Estates Group and Hallam Land Management

Section 2: Vision

Paragraph etc	Comments	Ref.	Name
General			
	Pleased to see Figure 3 shows one of the key influences of the Vision is delivering aim to become a leading environmentally friendly city. Satisfied that aspirations will balance physical growth and sustainability, reduce energy use, increase renewable energy, reduce waste, avoid inappropriate development in areas of flood risk, promote sustainable design and construction and avoid depleting the Sherwood sandstone aquifer.	5/7143	Environment Agency
	Concerned re housing, about proposal that "in setting Green Belt boundaries sufficient flexibility will be built in to accommodate higher levels of growth if needed." Areas A and B on Key Diagram would not be sufficient to provide for excess housing referred to in comments on Background (Ref 52/8324). Areas D, E and F shown on consultation leaflet, but not mentioned in LDF report, are likely options, despite their disadvantages outlined in Topic Paper 1. Decline in retail market share does not imply a decline in viability of city centre. Over development of Castle Piccadilly will waste an opportunity to regenerate this area for greater public benefit. Drawing in increasing numbers of shoppers from outside York by problematic transport solutions and encouraging unsustainable consumption will adversely affect ambiance and fabric of historic core, and contribute to rapid decline in quality of public realm. Aspiration to become a "leading environmentally friendly city", "striking an appropriate balance between physical growth and environmental sustainability " cannot be achieved by pursuing population and economic growth targets as presently defined. Until these conflicts are resolved, policies outlined cannot be seen to form a coherent and logical basis for future development.	52/8325	York Environment Forum
	Redevelopment of York Northwest will contribute to achievement of "vision". Could be compromised if Core Strategy policies are applied inflexibly to British Sugar and York Central sites. Should be recognition that redevelopment of both sites will be informed by policy framework to be contained in York Northwest AAP.	525/7509	Associated British Foods plc
Vision - LDF Vision for York			
	Vision should be refined as strategy develops towards submission. Theme 1: Is key driver of core strategy. Green Belt important here, since its main purpose is to protect the historic town. Views within and into the City, links with the green infrastructure and with tourism are also important. Theme 2: Need to be able to show how places and proposed development areas derive from the strategy. Reads as if decisions have already been made. This can be refined to include broad indicators of amounts and locations of development etc. Affordable housing should also be in the right place and at the right time. Should be clear that universities contribute to other parts of the strategy, including the economy.	1/7085	Government Office

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Vision - LDF Vision for York continued			
	Theme 3: Need to expand on links between tourism and the historic city. Universities are important here through links with Science City and the retention of a graduate workforce. Theme 4: Transport infrastructure should be one of the main drivers of the spatial strategy and not retro-fitted. The setting of permanent Green Belt boundaries is a key element of the other 3 themes. Reference should be made to the eco credentials of the Northwest site.	1/7085 continued	Government Office continued
	Support the vision and note that it reflects the ambitions of the RSS.	2/	Local Government Yorkshire & Humber
	York's Special Historic and Built Environment: - Line 3 - add after "right" - "because the city's future and its past are interdependent" . Line 4 - substitute "give" for "gives". Line 8 - add after "centre" - "and radial roads" . Line 9 - add after "villages and valued" - "strays, river corridors and open spaces ..." . Building Confident, Creative and Inclusive Communities: - Line 10 - add after "recreation" - "The integration of local neighbourhoods into the wider fabric of the city is supported by the role played by the radial roads" . A Prosperous and Thriving Economy: - Line 8 - add after "land" - "in locations appropriate to the city's historic development" . Page 15: - Penultimate paragraph Line 2 - add after "preserve" - "and enhance ..." . Final paragraph Line 8 - add after "addressed through the" - "development and implementation of."	110/8294	York Civic Trust
	Support Vision, particularly key references to innovation and to York as a world-class centre for education. Main concern is that these do not get picked up in the 4 key themes that are intended to be derived from the vision, and do not therefore get the prominence they merit in the rest of document and proposed strategies. Propose: - a) word "modern" to be inserted before "economy" in " A Prosperous and Thriving Economy" and b) a new Key Theme" A World Class Centre for Education" is added between the current second and third themes	190/8273	University of York

	Amend 2nd sentence to reflect York's importance within Leeds City Region, so is not simply referred to as "a part" of Leeds City Region, but as a "key driver", in accordance with emphasis placed on York's role within adopted RSS. Welcome reference in final paragraph on page 13 to concentrating development on main urban area, including significant contribution from area covered by York Northwest. Amend 2nd paragraph, page 14, to provide sufficient flexibility, and make reference to affordable housing viability assessment that Council will need to undertake as part of LDF evidence base, following Blythe Valley case. Following should be added to end of paragraph: - "having regard to viability considerations, and taking account of the Blythe Valley precedent." Location specific reference, 4th paragraph on page 14 to new office quarter "to the rear of York's railway station" is inappropriate level of detail. Replace with "at York Central....". In 5th paragraph, page 14, should be aiming to achieve 37% market share, to strengthen position in sub-regional retail hierarchy, reduce leakage of trade and facilitate sustainability.	214/7304 621/7350	Network Rail National Museum of Science & Industry

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Vision – LDF Vision for York continued			
	Paragraph also refers to options for complementary comparison goods retail development on York Central. Nature of retail provision here should not be pre-determined, but should be assessed having regard to Retail Study, further work commissioned by Council which is currently underway, and emerging Draft PPS4. Term complementary goods not defined and subject to interpretation. In last sentence of paragraph, insert "York Northwest" between "city centre" and "district centres" to reflect retail LDF evidence base.	214/7304 621/7350 continued	Network Rail National Museum of Science & Industry continued

	a) Broadly support, especially that aspect which relates to preservation and enhancement of unique historic character and setting of York. However, as currently worded, not particularly place-specific and does not articulate thrust of community strategy as clearly as it might, especially regarding those aspects which relate to special qualities and distinctiveness of York. Starting point should be to ensure that whatever happens in York, does so in a manner which not only safeguards, but strengthens, city's unique environment. Suggest that Vision is amended as follows: - "York aspires to be a City whose special qualities and distinctiveness are recognised worldwide, where its unique legacy of historic assets are preserved and enhanced, and where the full potential that its historic buildings, spaces and archaeology can contribute to the economic and social welfare of the community is realised York will be a city of... etc". b) Overall, strikes a reasonable balance between different factors. However, Section entitled "York's Special Historic and Built Environment" should make clear that in achieving other objectives (particularly prosperous and thriving economy) LDF will seek to ensure that its historic environment will be safeguarded. Section on Green Belt (penultimate Paragraph of Page 15) should be included under Section on historic environment. This Policy tool is there primarily to safeguard special character and setting of historic City.	242/7418	English Heritage
	Supports vision to ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk from River Ouse, Foss and Derwent and other sources. Further point raised is to avoid depleting Sherwood Sandstone aquifer. No further mention of what this actually means and what measures will be put in place to avoid this. This issue has caused some confusion during other LDF consultations and at 2007 RSS examination. To clarify, Yorkshire Water has consent to abstract water from aquifer. However, does not mean that further development in vicinity would result in increased abstraction. York is supplied with water from a variety of sources across Yorkshire, which can be moved across region.	320/7450	Yorkshire Water

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Vision – LDF Vision for York continued			
	Planning objective relating to a prosperous and thriving economy in terms of resisting comparison goods retail development outside City Centre and York Northwest, does not respond appropriately to York's issues, challenges and opportunities set out in Background. Areas outside City Centre such as Monks Cross should not be ruled out where they facilitate retail growth, which maintains and enhances York's market share without harming City's vitality and viability. Retail Study and Background Section notes a significant need for additional comparison floorspace, which needs to be addressed, to address decline in York's market share from trade leakage to competing qualitative superior shopping centres. Limited opportunity to meet this need in City Centre. Sites identified at Castle Piccadilly and York Central are subject to major development constraints and unlikely to be developed for large-scale comparison retail to meet any of this need within a reasonable timescale. Objective in relation to prosperous and thriving economy should be amended and not prohibit retail development outside City Centre.	370/7484	Trustees for Monks Cross Shopping Park
	Building Confident, Creative and Inclusive Communities Supports acknowledgement that LDF will make provision for at least level of homes set out in RSS up to 2026. Council has correctly interpreted RSS policy, which states that housing targets are not ceilings. However, need to ensure vision is taken through Core Strategy where at present it does not provide flexibility plan needs. Also supports assertion that in setting Green Belt boundaries sufficient flexibility will be built in to accommodate higher levels of growth if needed. In meeting this, development will be concentrated on York's main urban area. Object to wording in respect of release of Green Belt land towards end of plan period. Flexibility needs to be provided to allow Council to release land appropriately to ensure continuous 5-year supply of deliverable housing sites in accordance with PPS3. This includes potential need to release Green Belt land at any point required over course of LDF period. At present Green Belt boundaries for City are drawn too tightly and thus constrain development. When establishing boundaries, must ensure will endure and not include land, unnecessary to keep permanently open. Means a clear understanding of phasing required from priority areas in Northwest AAP, as well as built out rates at Germany Beck, Derwenthorpe, Terry's and Hungate. Simply pushing back release of deliverable land currently identified, as Green Belt land will undermine emphasis of ensuring a rolling supply of deliverable land is maintained. Objects to strategy of extensions to main built up areas being brought forward for development towards end of plan period. To ensure a rolling supply of deliverable housing land, sites such as Land adjacent to A1079 should be brought forward earlier in plan period. Even when sites have received planning permission, large sites are still a number of years away from actually delivering houses.	2517/7885	Lands Improvement

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Vision – LDF Vision for York continued			
	Following signing of S106 agreements from an outline application, it could be a further 2.5 years before construction of first units are completed. Taking into consideration lead in times and build out rates on phased delivery of developments, which the Council is heavily relying on to meet its current housing targets likely to be a significant shortfall in sufficient deliverable land which will not provide rolling supply needed. Therefore need to ensure that sufficient deliverable land is released to meets housing targets in plan period, including need to reconsider strategy for release of deliverable Greenfield land, to around 2014/15 to ensure housing targets are met. Supports recognition and support for ongoing development of University's Heslington East Campus. A Leading Environmentally Friendly City Supports need to create a permanent Green Belt for York that will endure until at least 2030. Believes a defensible Green Belt boundary is A64, with release of land for development "inside" outer ring road will provide flexibility needed to ensure continuous supply of land.	2517/7885 continued	Lands Improvement continued
	Building Confident, Creative and Inclusive Communities - Recognition of need for flexibility in setting Green Belt boundaries to accommodate higher levels of growth supported. A Leading Environmentally Friendly City - 2nd Bullet Point, question why necessary to exceed renewable energy targets in RSS. Primary way to tackle climate change is to reduce CO2 emissions. Many ways this can be achieved. First step is through reduced energy consumption. Renewable energy sources are one other important aspect. However, costs of developing renewable energy has to be considered against reductions in CO2 achieved and whether can be can be achieved in more cost effective ways.	2523/7914	Grantside Ltd
	Building Confident, Creative and Inclusive Communities - 2nd paragraph, support reference to flexibility being built in when setting Green Belt boundaries to accommodate higher levels of growth beyond that set in RSS. Green Belt boundary must therefore endure beyond plan period. Core Strategy currently going against national guidance and regional advice as no flexibility in land supply to account for exclusion of windfall sites, lower rates of delivery on key sites and an anticipated increase in housing allocation in IRS. Does not identify enough land to be removed from Green Belt through Areas of Search A and B to provide for flexibility in meeting existing or future need. In 3rd paragraph support statement that housing will be provided of an appropriate type and mix to meet needs of York's residents.	2542/8050	Moor Lane Consortium
	Building Confident, Creative and Inclusive Communities - Support need to cater for additional housing up to 2030 and decision to roll-forward RSS requirement. Object to reference of sustainable urban extensions being used in final part of plan period. Believe that such sites will be required in medium term. Text should be amended to reflect this.	2689/8136	Monks Cross North Consortium

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2			
	Should be stronger link made with RSS policy (YH8 and TI). Should specifically: Make best use of existing, and create new, green infrastructure to raise economic performance, promote economic and social inclusion, create sustainable communities, and improve environment; Use green infrastructure to provide an enhanced environmental context for new development and regeneration schemes; Promote partnership working and define who will provide Green Infrastructure and when it will be provided. Ensure the following: Early stage identification of strategic issues relating to water cycle, protected nature conservation sites such as Special Areas of Conservation and flood management; Development of evidence required to inform any plans and proposals needed to address and mitigate these issues; Specific green infrastructure solutions, at both a strategic and a more site specific levels are identified and guide necessary delivery mechanisms.	4/7122	Natural England
	Satisfied that sufficient factors have been considered however concerned that level of development planned will make it difficult to maintain city's vision and spatial objectives. Welcomes development of a Green Infrastructure Strategy for York.	49/7183	Yorkshire Wildlife Trust
	a) Vision mentions making provision for at least level of homes set out in RSS up to 2026. 2026 should be end date for LDF as well. This will ensure that the two are more in line. Would also ensure that no land within Green Belt would need to be allocated for housing. To "identify potential sustainable extensions to the main built up areas 'now' to ensure supply towards the end of the plan period" is not needed if period runs until 2026, taking into account existing brownfield land plus current and future windfall sites. Vision should not contemplate building in draft Green Belt at this moment in time. b) More weight needed on protecting York's special character - Vision should mention need for a capacity study. More emphasis on preserving special character of York is needed. Key aspects mentioned seem to contradict each other and level of housing growth and economic development should be considered together and balanced against potential harm to York's historic character. If considered in isolation, it will perpetuate current harmful situation of housing quotas and growth projections being given more weight than harm to York's historic and environmental character. Lack of consideration of infrastructure constraints – Doubt whether York's infrastructure can deal with vision of future economic growth and projections of housing needs. Recent scrutiny report looked at all aspects of addressing forecasted growth of traffic and prediction on current trends was "gridlock." It also stressed worrying predictions for air pollution if car usage continued to grow. More research is needed.	70/8197	Fulford Parish Council

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2 continued			
	Building Confident, Creative and Inclusive Communities - Supports acknowledgement that LDF will make provision for at least level of homes set out in RSS up to 2026. Council has correctly interpreted RSS policy, which states that housing targets are not ceilings. Need to ensure this is taken through Core Strategy. Also supports assertion that in setting Green Belt boundaries sufficient flexibility will be built in to accommodate higher levels of growth if needed. Objects to wording of vision in respect of release of Green Belt land towards end of plan period. Flexibility needs to be provided in LDF to provide means to release land appropriately to ensure a continuous 5-year supply of deliverable housing sites in accordance with PPS3. This includes potential need to release Green Belt land at any point required over course of entire LDF period. At present Green Belt boundaries are drawn too tightly and thus constrain development. Under PPG2 the Council must ensure that Green Belt boundaries will endure and not include land, which is unnecessary to keep permanently open. Must ensure that flexibility is built into Core Strategy to ensure: - There is a continuous five year supply of deliverable sites; A further supply of specific, developable sites for years 6-10 and; Where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be identified. Strongly objects to strategy of extensions to main built up areas to be brought forward for development towards end of plan period. To ensure a rolling supply of deliverable housing land, sites such as Persimmons deliverable land interests should be brought forward earlier in plan period. Even when sites have received planning permission, delivery of housing on large sites are still a number of years away from actually completing houses. Following signing of S106 agreements from an outline application, it could be a further 19 months before the first units are completed. Likely to be a significant dwelling shortfall from those sites which Core Strategy's vision & approach heavily relies upon in respect of maintaining a rolling supply of deliverable dwellings across entire LDF period. Need to ensure sufficient deliverable land to meets housing targets in emerging plan period is released. Includes need to reconsider strategy for release of deliverable Greenfield land, to around 2014/15 to ensure housing targets are met. Need to ensure that Green Belt boundaries will not be drawn too tightly and thus constrain future development in City, particularly around main urban area.	161/7232	Persimmon Homes (Yorkshire)

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2 continued			
	Leading Environmentally Friendly City Supports and acknowledges need for LDF to create a permanent Green Belt for York that will endure until at least 2030. When establishing Green Belt boundaries should consider guidance in PPG2 and ensure are not drawn excessively tightly around existing built up areas. Would devalue concept of Green Belt and adversely impact ability to appropriately plan for necessary future development required to ensure continued success and sustainable growth of York.	161/7232 continued	Persimmon Homes (Yorkshire) continued
	Supports reference to need to make provision for "at least" RSS housing requirement projected forward to end of plan period (i.e. 2030). Also supports reference to need to be sufficiently flexible in setting Green Belt boundaries to ensure that higher levels of growth can be accommodated if needed. Reference to sustainable urban extensions, in order to meet development requirements to end of plan period is also supported as it helps set context for proposed approach to accommodating housing and other growth. In broad terms, considers that proposed Vision responds to framework set by national guidance and RSS; issues facing York; and, sustainable development strategies. However, consider that vision should incorporate a greater spatial context so that strategy is derived from a spatial vision for city, rather than broad generalisations.	164/7252	Hogg Builders (York) Ltd
	a) Probably in principle correct although market will decide what is sustainable and what is not. b) A reasonable balance. York will grow at some time in future and there will be some effect on Core Strategy required if development is going to be allowed.	198/7280	The Helmsley Group
	a) Agree with assessment b) Agree balance is correct and no other factors need consideration at this stage.	218/7396	Northern Gas Networks
	Acknowledgement of importance of York's role as a world class centre for further and higher education and commitment that LDF will help to facilitate success of College is supported. Creation of a permanent Green Belt for York to endure until 'at least 2030' is questioned. Whilst complies with current RSS, expected that emerging IRS will require need to accommodate increased housing numbers for area. As such, Green Belt boundaries may need to be reviewed at an earlier stage.	276/7438	Askham Bryan College
	Supports Vision, however, notes that only expansion of York University is explicitly mentioned and supported on page 14. Ambitions of all educational institutions in city need to be recognised and supported, including ongoing development of York College. Note aim to create permanent Green Belt to 2030. Needs to be balanced with aims of creating "a prosperous and thriving economy" and "building confident, creative and inclusive communities". Needs to be greater degree of flexibility to allow for future change and growth. Timescales associated with Green Belt boundary need to align with RSS to 2026.	282/7444	York College

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2 continued			
	No specific objections or concern relating to these overarching principles and objectives, however how they are translated into spatial principles and specific sections of document is confusing, particularly as expressed within Figure 4. A clearer illustrative model would be helpful in demonstrating linkages between vision, principles and policy. Reference is rightly made to requirements within RSS for housing delivery targets along with an acknowledgement that concentration of such development should be on main urban area of York. However question reference to Green Belt, which indicates that 'sufficient flexibility will be built in to accommodate higher levels of growth if needed'. In this case extent of Green Belt, and specifically inner boundaries, should be drawn to accommodate likely required amount of development needed and in accordance with minimum targets expressed in RSS. PPG2 stresses requirement for permanence of Green Belt boundaries, so such boundaries should not be identified if it is considered likely (or even possible) that extent of Green Belt is insufficient to meet likely housing needs over plan period. Principle of Protected Areas of Search remains sound in principle however should not be used as an alternative or option to avoid setting realistic and robust Green Belt boundaries at this stage.	331/7470	Taylor Wimpey (UK) Ltd
	a) The Sustainable Community Strategy - Difficult to reconcile objective that "development should not adversely affect the distinctiveness, character and setting of the city" when stated that LDF will make provision for "at least the level of homes set out in the RSS up to 2026 projected forward to the end date of this plan." Such growth in population over a relatively short time will place an intolerable burden on York. Fundamental contradiction between local Sustainable Community Strategy, Government's Sustainable Development Strategy, and unsustainable growth demands of RSS. Increasing number of modern retail units to attract a broader range of multiple retailers will have a detrimental effect on existing retailers, adversely affecting distinctiveness and character of city's retail offer. Modern retail units have elsewhere encouraged retailers to move from existing buildings in city centre to new units, effectively creating void properties of distinctive and often historic buildings which were previously in use as retail units. No net gain of retailers in such cases and result is abandonment of historic properties. Developing Castle Piccadilly for retail is not a risk York should be taking. York's Issues, Challenges, and Opportunities - Whilst area behind railway station is a good sustainable location for offices, if York already has a net inward flow of trips to work it seems unnecessary to build considerably more offices to invite even more commuting or enlarge York's population. This growth policy will only create more challenges for city.	458/7557	York Green Party

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2 continued			
	Concern might be raised at effect on social cohesion if York is to experience a large number of inward migrants in a short period of time. City has relatively little experience of accommodating large migrant communities and would present a challenge to a variety of services. Should grasp opportunities to capitalise on unique heritage. Opportunities must be taken to mitigate effects of climate change on city. This means protecting gardens for growing food, more allotments, investing in Newgate Market, and improving energy efficiency of existing housing stock as well as new. Should make better use of rivers for transport, housing, and tourism. RSS: - Far too demanding and would be damaging to environment, transport infrastructure, historic environment, and social cohesion to continue with its proposed levels of growth. LDF ought to scale back demands of RSS to a level commensurate with capacities that York could handle. Environmental Capacity Study necessary to establish a more reasonable base. Recommend Council negotiate much lower and more sustainable rates of growth as part of IRS. Sustainable Development including the UK Sustainable Development Strategy: - Makes reference to following four points: - Sustainable Consumption and Production; Climate Change and Energy; Natural Resource Protection and Environmental Enhancement; Sustainable Communities. LDF suggests no solutions to first point. Makes no reference to York's Climate Change Strategy, and although does state there is potential for renewable energy generation targets set should be broader and more ambitious. Parts of LDF aim to conserve natural resources and enhance local environment, but these are outweighed by continued adherence to excessive economic growth. Encouragement of mixed, cohesive communities is outweighed by plans for excessive growth. b) Balance is not right. Indicates RSS targets are set in stone and non-negotiable. Not acceptable as makes a mockery of any form of consultation. Growth demands not sustainable and contradictory to other principles.	458/7557 continued	York Green Party continued
	Vision should reflect emphasis that York is regarded as a "key driver" of Leeds City Region within RSS. Vision could be strengthened in a number of ways: - Specific role of Science City York should be emphasised much more; Increased emphasis on importance of tourism; Recognition of links between four strands of vision.	479/7727	Yorkshire Forward

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2 continued			
	Welcome statement that York will fulfil its role as a leading environmentally friendly city but consider proposed role of LDF in helping to deliver aspiration is too small. Environmental issues such as noise, dust, light and odour, must be considered when determining location of any development and need to be considered at a strategic level. LDF will play a key role in ensuring that land contamination is considered at a strategic planning level. At present role is focussed primarily on contribution to reducing carbon and eco-footprint. Local air quality is only mentioned in relation to managing transport. Section should be amended to reflect importance of local air quality issues alongside carbon management and to make provision for introduction of a LES. Suggest inserting after word "reduction" in 1st sentence of a Leading Environmentally Friendly City: - "in emissions of carbon dioxide and nitrogen dioxide through a low emissions strategy". List of possible measures could be amended to include the following: ▪ Encouraging a reduction in total emissions of nitrogen dioxide and carbon dioxide across the city by requiring reductions in energy use and the uptake of low emission technologies and transport on new developments ▪ Supporting development that reduces the need to travel and which eliminates private car parking spaces ▪ Supporting development that gives priority to low emission vehicles and accelerates the uptake of low emission and energy efficient technologies. ▪ Supporting improvements to walking, cycling and public transport provision and encouraging the movement of goods by low emission methods ▪ Requiring developers to carry out local emission mitigate measures, or contribute towards low emission measures elsewhere in the city. ▪ Encourage the creation of a low emissions economy ▪ Ensuring that the renewable energy targets set within the RSS, are exceeded but without detriment to local air quality (see previous comments on impact of biomass burners in Question 1) Reference should also be made to LES under York's Special Historic and Built Environment and A Prosperous and Thriving Economy.	2291/7812	CYC Environmental Protection Unit
	A Prosperous and Thriving Economy - accessibility to travel options and mode choice are fundamental elements to be considered in location of new developments. Recognises some employment sites identified already have extant planning permission, which includes B1 office use. Supports locational requirements for office use set out in PPS6 and RSS.	2434/7841	Highways Agency

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2 continued			
	Will seek to oppose proposals including B1 office use, other than as ancillary to main employment use, for employment sites in vicinity of SRN for which planning applications will need to be submitted. A Leading Environmentally Friendly City - supports reducing need to travel and promotion of sustainable modes.	2434/7841 continued	Highways Agency continued
	Building Confident, Creative and Inclusive Communities - supports reference to need to make provision for at least RSS housing requirement projected forward to end date of plan period. Also supports reference to need to be sufficiently flexible in setting Green Belt boundaries to ensure that higher levels of growth can be accommodated if needed. Reference to sustainable urban extensions, in order to meet development requirements to the end of plan period is also supported. In broad terms, Vision responds to framework set by national guidance and RSS; issues facing York; and, sustainable development strategies. Should incorporate a greater spatial context so that strategy is derived from a spatial vision for city, rather than broad generalisations.	2524/7923	Barratt Homes (York) Ltd
	Suggest should reflect prevailing practice when setting objectives and targets. They should be time related. This is in line with PPS12. Should begin by stating: - "By 2030 York aspires to be a city of ..." Not clear what Council's priorities are. Economic Development and Accessibility need to be firmly at forefront. In line with RSS and Government Guidance these topics should be at centre of vision for District, this is not apparent in here and appears overly dense and difficult to digest and cross-refer when assessing suitability of proposed policy.	2527/7939 2528/7963 2537/7987 2688/8011	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	a) Support flexibility written into vision to accommodate higher levels of growth if needed. Current approach to land supply in Core Strategy does not provide flexibility. b) Needs to emphasise importance of not overdeveloping urban area in meeting growth needs that could result in a detrimental impact on city's historic environment.	2542/8051	Moor Lane Consortium
	Noted that future development will be located where it will enable people to access jobs and key services, including education, training, healthcare, and recreation. PPS1 and RSS state, development should be located in sustainable areas, with good access links, close to local services, where there would not be an increased reliability on car, generating more vehicle journeys and increasing car emissions. Through releasing sections of current Green Belt for development, and reassessing whether they meet criteria, will provide York with an accurate Green Belt, which would not need to be re-assessed in near future, and will endure Plan period. Site at Tadcaster Road meets all of these criteria, and should be released from Green Belt with a parcel allocated for residential development.	2576/8096	The Wilberforce Trust

Section 2: Vision continued

Paragraph etc	Comments	Ref.	Name
Question 2 continued			
	The site is ideally suited to help meet RSS housing figures as is in a sustainable location and would help to round off settlement boundary in a more logical fashion, creating an ideal infill development site and rounding off built environment.	2576/8096 continued	The Wilberforce Trust continued
	a) Should include as a distinct and separate component “meeting the needs of its present and future population”. To do this essential that policies satisfy identified needs in terms of quantity and correct mix of new housing, and that housing is developed in sustainable locations where people want to live. Should ensure that policies require number of houses set out in RSS to be a minimum requirement and provide sufficient flexibility to deliver additional new housing numbers in line with population and demographic projections. Principle of pushing out date to 2030 to provide longevity to Green Belt boundary supported but should be for a longer period say to 2040 or 2050. This will result in additional development requirements, which should be identified in Allocations DPD as safeguarded land for future development. Core Strategy should make necessary policy provisions to enable Allocations DPD to identify such safeguarded land. RSS identifies inner edge of Green Belt boundary as “to be defined”. LDF process will need to deliver definition of this, but not job of Core Strategy. This should simply identify overall development needs and underlying requirement to set Green Belt boundaries with a degree of permanence and then leave it to Allocations DPD to identify and provide details of land to be allocated to meet those needs. Another potential problem for Core Strategy is reliance on holding larger development sites back towards end of plan period and then expecting them to deliver all of numbers attributed to those sites in a short period of time. Delivery will also be particularly reliant on provision/improvement of infrastructure and by sales rates. LDF cannot and should not rely on these to deliver large housing numbers within limited timescales. Vision must be underpinned by realism in terms of deliverability otherwise aspirations and Vision will not be met. b) Greater emphasis and a specific reference and category should be added relating to meeting the needs of the existing and future population of York.	2698/8228	Commercial Estates Group and Hallam Land Management

Section 3: Spatial Strategy

Paragraph etc	Comments	Ref.	Name
General			
	We consider that the spatial strategy is generally emerging in line with the RSS.	2	Local Government Yorkshire and the Humber
	Any elements of the Strategy, which have an influence over the spatial distribution of development, should be subject to PPS25 flood risk Sequential Test. Expect to see a free-standing Sequential Test Topic Paper produced as part of evidence base to transparently demonstrate how flood risk and the requirements of PPS25 have been taken into account in coming to decisions. As a general rule, advise use of flood risk management hierarchy as set out in PPS25 Practice Guide. Could manifest itself through formulation of policy for strategic development areas, steering open space and other water compatible uses towards highest risk areas, and most vulnerable uses towards the lowest risk areas. This could preclude sensitive uses, such as housing, old people's homes or nurseries/child day care centres in flood risk areas. It could influence the phasing of housing in flood risk areas and could stipulate design requirements such as siting more vulnerable uses on upper floors only, or precluding bungalows in flood risk areas. The reasoning of the strategic objectives of section 8 could be loosely interpreted as meaning safe throughout the lifetime of the developments in terms of flood risk, but this has not been made clear in the Sustainability Appraisal.	5/7144	Environment Agency
	LDF points out that areas of search are not to be identified for development at the moment, but are to be subject of public consultation at some unspecified time in future. However, it is these areas, which are to be taken out of Green Belt so that inner boundary can be defined. This is in advance of the need for these areas being identified in detail. Not clear if these areas are to be classified as "Reserved land". The elimination of areas D, E and F from potential areas of search is welcomed, and even if it is decided that areas A, B and C might be required, there must be a policy commitment to provide necessary structural landscaping to protect views from ring road and implement green corridors in advance of development.	52/8326	York Environment Forum
	Suggests exclusion of an area of land at Whitehall Grange, Clifton Moor from Green Belt. See representation for supporting site information.	172/7278	Raymond Barnes

	RSS Policy provides that inner boundary of Green Belt should be set to accommodate level of development envisaged. This is a minimum requirement. Whether or not it is appropriate to set different levels of development land requirements for allocations purposes, it remains necessary for RSS requirement to be provided within inner boundary. Approach to Green Belt Appraisal (2003) not an appropriate document to rely on in its entirety, as Category 2 and 3 notations not related to purposes of York Green Belt as defined in RSS. Helpful to policy interpretation and useful to allocations process, if general extent of Green Belt was identified on a map rather than just being indicated diagrammatically.	606/7757	Jennifer Hubbard

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
General continued			
	Fundamental to historic character of York is process of expansion, involving growth of urban core outwards to absorb settlements previously beyond it. Recent examples exist in form of Heworth and Acomb. Both previously separated from central core and communities in their own right. Their subsequent coalescence with urban core has added to local character yet retaining their sense of local community. Coalescence did not adversely affect these and no justification to reverse this pattern of expansion. Vision and RSS indicates that City is likely to expand and that rate of expansion in 21st Century is likely to exceed that of 20th Century. Would be appropriate to establish broad principles for future expansion. Map as shown in Key Diagram offers two alternatives: - Expansion out from Ring Road, or Linear expansion to or towards existing adjacent settlements. Choice, based on history and thus preserving historic character, is second of options. Linear routes/directions for expansion can be identified towards: - Haxby/Wiggington; Dunnington; Skelton; Poppleton and; Copmanthorpe. Process does not require all intervening land to comprise built development, but identification of routes for expansion establishes appropriate location for expanded green wedges between general directions of future growth. These can only be justified by identification of direction of development growth i.e. strategy for long-term development. Resolution of these strategic principles is appropriate to establishment of a long-term Green Belt. Need to recognise importance of and provide support for larger villages, which provide key services and thus function as rural service centres for surrounding area. Without some new housing development, enabling existing population base to be maintained but preferably accommodates some modest population growth, these essential facilities will decline and service function, destabilising these communities and resulting in more commuting and greater reliance on private car. Apart from villages on periphery which fall within York's immediate setting and settlements of particular distinctiveness/character, modest growth of larger villages can be achieved without adversely affecting any of purposes of Green Belt. New residential development in villages should not be limited to affordable housing and/or housing to meet local needs. Maintaining viability and vitality of villages requires a mix of open market and affordable housing. No adequate definition exists for "local needs".	606/7757 continued	Jennifer Hubbard continued
	RSS Policy provides that inner boundary of Green Belt should be set to accommodate level of development envisaged. This is a minimum requirement. Whether or not it is appropriate to set different levels of development land requirements for allocations purposes, it remains necessary for RSS requirement to be provided within inner boundary.	610/7778	Mr G E Wright

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
General continued			
	Whether or not it is appropriate to set different levels of development land requirements for allocations purposes, it remains necessary for RSS requirement to be provided within inner boundary. If development land is to be provided beyond inner boundary following factors apply: - Requirement must represent development needs beyond those identified in RSS; Unless proposed allocations beyond inner boundaries are not within general extent of Green Belt, allocations will require an approach which is clearly identified as a review of Green Belt. Spatial Principles as currently set out, are not in compliance with RSS policy and it seems unlikely that a review of Green Belt would be permissible in circumstances where inner boundary is being set. Approach to Green Belt Appraisal (2003) not an appropriate document to rely on in its entirety, as Category 2 and 3 notations not related to purposes of York Green Belt as defined in RSS. Helpful to policy interpretation and useful to allocations process, if general extent of Green Belt was identified on a map rather than just being indicated diagrammatically. Map published by NYCC in association with York Green Belt Local Plan process in December 1990 indicated general extent of Green Belt. Should be recognised and identified as definitive notation of general extent of York Green Belt. Fundamental to historic character of York is process of expansion, involving growth of urban core outwards to absorb settlements previously beyond it. Recent examples exist in form of Heworth and Acomb. Both previously separated from central core and communities in their own right. Their subsequent coalescence with urban core has added to local character yet retaining their sense of local community. Coalescence did not adversely affect these and no justification to reverse this pattern of expansion. Vision and RSS indicates that City is likely to expand and that rate of expansion in 21st Century is likely to exceed that of 20th Century. Would be appropriate to establish broad principles for future expansion. Map as shown in Key Diagram offers two alternatives: - Expansion out from Ring Road, or Linear expansion to or towards existing adjacent settlements. Choice, based on history and thus preserving historic character, is second of options. There is an immediate case to take inner boundary around outside of Haxby/Wiggington, and that would also allow for development land to be accommodated there, within current LDF framework. Similar linear routes/directions for expansion can be identified towards: - Dunnington; Skelton; Poppleton and; Copmanthorpe. Process does not require all intervening land to comprise built development, but identification of routes for expansion establishes appropriate location for expanded green wedges between general directions of future growth.	610/7778 continued	Mr G E Wright continued

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
General continued			
	These can only be justified by identification of direction of development growth i.e. strategy for long-term development. Resolution of these strategic principles is appropriate to establishment of a long-term Green Belt. Need to recognise importance of and provide support for larger villages, which provide key services and thus function as rural service centres for surrounding area. Without some new housing development, enabling existing population base to be maintained essential facilities will decline and service functions will be lost if populations are not maintained. New residential development in villages should not be limited to affordable housing and/or housing to meet local needs. Maintaining viability and vitality of villages requires a mix of open market and affordable housing. Such requirements are needed to address effects of reduction in household size and do not have to represent growth but additional housing to prevent population reductions in villages.	610/7778 continued	Mr G E Wright continued
Introduction			
Paragraph 3.2	Bullet points should make specific reference to key requirement of ensuring that sufficient new residential development is provided to meet RSS housing requirements for City. Additional wording should be included to following key elements of vision for LDF: - "Ensuring that a flexible and deliverable supply of housing land is provided to meet York's RSS housing requirements in terms of both number and type".	161/7234	Persimmon Homes (Yorkshire)
	Welcomes approach. Text in 3 rd bullet point should be amended to reflect sub-regional role of York relates to economy, as well as shopping and entertainment.	479/7728	Yorkshire Forward
	Bullet points should make specific reference to key requirement of ensuring that sufficient new residential development is provided to meet RSS housing requirements. Following bullet point should be added: - "Ensuring that a flexible and deliverable supply of housing land is provided to meet York's RSS housing requirements".	2517/7886	Lands Improvement
	Support.	2696/8178	Thomlinsons Solicitors of Wetherby
Context - You Told Us			
Paragraph 3.4	3rd Bullet - recognise public support for concentrating future growth within or adjacent to York's main urban area. 4th Bullet - recognise public support for preserving historic character of York.	2542/8052	Moor Lane Consortium
	Support recognition of Haxby and Dunnington as settlements, which are similar to small service centres.	2696/8179	Thomlinsons Solicitors of Wetherby

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Context - Local Issues			
Paragraph 3.5	Another local issue that should be discussed in developing an appropriate spatial strategy for York is need to locate urban extensions within outer ring road.	2542/8053	Moor Lane Consortium
Context - The Relationship between York and its Surrounding Settlements			
Paragraph 3.6 - 3.7	These could be expanded to consider relationship between York and settlements within East Riding of Yorkshire.	17/7169	East Riding of Yorkshire Council
Context - The Role of the City and District Centres			
Figure 5	Earswick should be moved up the hierarchy to be classified as a Village.	605/8102	Mrs Barker
	Monks Cross should appear as a District Centre on edge of main urban area. It performs a strategic employment, retailing and leisure location well within walking and cycling distance of city. It performs as a District Centre to many residents in north-eastern part of York.	2689/8137	Monks Cross North Consortium
Context - Preserving the Historic Character and Setting of York			
Paragraph 3.10	Support objective. In practical terms this means there are only a limited number of areas in and around City of York where new development would or could be acceptable.	2696/8180	Thomlinsons Solicitors of Wetherby
Paragraph 3.10 - 3.11	Concerned that proposal to identify extensions of green wedges in Green Belt for protection implies that protection accorded to valuable sites outside of corridors and linkages is weakened. Should make it clear that this is not case and that location of a site outside these designated areas does not per se strengthen case for development.	458/7558	York Green Party
Figure 6	Agree an appropriate starting point for Green Belt debate, which will need to be extended into Allocations DPD. Care needs to be taken not to fix a Green Belt boundary too tightly in Core Strategy that may then require further revision in Allocations DPD.	2689/8138	Monks Cross North Consortium
Context - Protecting and Enhancing York's Green Infrastructure			
Paragraph 3.12	Pleased to see this issue not only conserves biological and geological diversity but also protects and enhances nationally and locally significant nature conservation sites.	5/7145	Environment Agency
	As <u>draft</u> Green Belt has still not been adopted, there is an opportunity to review inner boundary as well as outer boundary (as prescribed by RSS) to consider alternative options for peripheral growth. This could be considered alongside an update of SHLAA. This will be necessary given shortfall in identification of housing sites and misguided reliance on windfalls and high-density schemes consisting largely of flats coming forward.	165/7267	Home Builders Federation
	Support protection given but need to recognise that all existing green space in plan area is valuable and can contribute to biodiversity, local amenity, healthy living and/or local food production. Green spaces should be protected regardless of their nature conservation 'significance'. Sites with wide range of common species should be seen as equally valuable to sites with rare species. Must not drive nature conservation into limited enclaves.	458/7559	York Green Party

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Context - Protecting and Enhancing York's Green Infrastructure continued			
Figure 7	Agreed to be a logical approach.	2689/8139	Monks Cross North Consortium
Context - Minimising Flood Risk			
Paragraph 3.13	Support statement that “ <i>greenfield areas subject to high flood risk (Flood Risk Zones 3a and 3b) are considered as inappropriate for future development for housing or employment</i> ”, on assumption this will be justified through application of Sequential and Exception Test, drawing on the evidence set out in the SFRA. Advise that evidence and justification for taking this approach is clearly set out so as to assure the document's soundness.	5/7146	Environment Agency
	Support mention of precautionary approach here. Should be included in Section 16. Should acknowledge need to minimise risks from surface flooding arising from increased rainfall intensity over a short period as has been experienced increasingly in recent years.	458/7560	York Green Party
Paragraph 3.13 and Figure 8	Would be helpful to illustrate flood zones 3a and 3b separately on Figure 8, in recognition of fact that for housing and employment development on brownfield sites Exception Test can be applied in some cases within flood zone 3a. Should be made clear that Council is working with Environment Agency in seeking confirmation that Exception Test will need to be applied in respect of major developments if overall sustainability objectives for City are to be met.	214/7305 621/7351	Network Rail National Museum of Science & Industry
Figure 8	Agreed to be a logical approach.	2689/8140	Monks Cross North Consortium
Context - Further Consideration			
Paragraph 3.14 - 3.15	Were there other potential areas of search that were discarded? If so have they been subject to SA? If there are no other reasonable options must be able to justify at submission. Important to show clear audit trail of how core strategy has developed. Need to be able to demonstrate that proposed sites, which are not commitments with planning permission, are the best/only alternatives (with SA). Development of spatial principles from themes in vision could be made clearer as could links with RSS. May be better in terms of presentation to keep to strands in vision and develop objectives from these.	1/7086	Government Office
Context - Major Development Opportunities and Sites			
Paragraph 3.16	See comments to Paragraph 3.14 – 3.15 above	1/7087	Government Office
	Comments on the potential for contamination were raised at the second Issues and Options stage. Paragraph 6.1 refers to York Northwest being the largest and most significant of two brownfield development sites. However subject of ‘remediation of contaminated land’ not identified as an issue within Core Strategy nor within sustainability appraisal.	5/7147	Environment Agency

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Context - Major Development Opportunities and Sites continued			
Paragraph 3.16 continued	Especially with British Sugar site being a food processing industry and York Central previously used by rail and related industries, both uses are identified by PPS23, Annex 2, Table 2.1 as potentially contaminating uses of land and situations where land may be affected by contamination. Provided no other significant policy conflicts, generally supportive of development proposals on contaminated site, as development can serve to facilitate land remediation. However, this can be difficult and expensive so any known contaminated areas should be flagged-up in interest of transparency and to ensure that issue will not affect deliverability. Would like to see an appropriate policy for the remediation of contamination where it is known or suspected to exist and for dealing with the implications of contamination. Recommend that any Part IIA sites should be identified along with any known highly polluted sites, which are likely to be subject to development pressure, and which will take significant remediation. Environmental impact of any new developments should be examined in terms of water pollution arising from surface water run off. Support strategic objective of creating an exemplar new sustainable and inclusive community of outstanding sustainable design which prioritise access by sustainable transport modes. Welcome techniques used to save and manage water efficiently, generate renewable energy and limit carbon emissions.	5/7147 continued	Environment Agency continued
	Castle Piccadilly - scale of any development must be limited, and of an architectural quality appropriate to context and setting. Should not extend to foot of Clifford's Tower.	110/8295	York Civic Trust
	Welcome recognition in 1 st bullet point that delivery of York Northwest will be essential to meeting vision. Also support will have key role in enhancing future office, commercial and leisure offer in new urban quarter. Amend next sentence to read, "will" instead of "could".	214/7306 621/7352	Network Rail National Museum of Science & Industry
	Welcomed.	479/7729	Yorkshire Forward
	Support recognition of York Northwest as being largest and most significant regeneration project in York area and a regionally significant investment priority within RSS. Support reference to preparation of AAP to ensure opportunities from development of the two sites is maximised. However, consider reference should be included to detailed framework, which will be outlined in AAP and guide redevelopment of both sites.	525/7510	Associated British Foods plc
The Preferred Approach			
Paragraph 3.16	Support recognition of Layerthorpe area as a development area. Agree provides a good regeneration opportunity, warranting investment and improved environmental quality.	2540/8033	National Grid Property
	Note projects referenced. This is a mix of small to large, medium to long-term projects, which will require more information on phasing.	2689/8141	Monks Cross North Consortium

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Paragraph 3.19	Despite the topic paper on the spatial strategy, it is not clear as to the rationale behind the identification of areas A and B. While we are not disputing their contribution to the spatial strategy we would welcome more explicit evidence around the role that the sites play in fulfilling the wider strategic role of York as part of the Leeds City Region and how they fit with planned transport investments. Employment location I would require careful evidencing. More detail on the type of employment proposed would help ensure that this site fitted with the wider Development Plan. We would also welcome some clarity as to the status of areas A and B. Are they strictly “areas of search”? The Core Strategy currently implies that there is a strong likelihood that they will be needed for development in the latter part of the plan period. To that end, you may wish to consider them as strategic sites that meet the needs of the current housing needs. Such an approach would of course beg the question as to the role of further areas of search for future development.	2/	Local Government Yorkshire & the Humber
Strategic Objectives	Third bullet point should be amended to reflect guidance within PPS25, to read: “that account is taken of the PPS25 Exception Test in identifying locations for development, so that flood risk is appropriately managed; and”	214/7307 621/7353	Network Rail National Museum of Science & Industry
	Whilst disagree with levels of growth aspired to, support statements in bullet points. Would add “ resilience in the face of climate change, an uncertain global economy and steeply rising global fuel prices ”.	458/7561	York Green Party
	Broadly supportive of adoption of strategic spatial strategy and intentions to ensure that: - York’s unique character and setting is protected; Future development is concentrated in locations well served by public transport and services, maximising use of brownfield sites; Flood risk is appropriately managed; and Wildlife and habits are protected.	2540/8034	National Grid Property
	2 nd Bullet - need for future development to come forward at sustainable urban extensions needs to be recognised. Should be amended to “ future development should be concentrated on Brownfield sites and appropriate sustainable urban extensions in locations well served by public transport and services. ”	2542/8054	Moor Lane Consortium
Targets	Reference to ‘windfalls’ suggests Council will need to rely on an element of this to meet future development needs over LDF period. Not consistent with PPS3. Council appears not to be achieving a genuine local circumstances case and as such this reference should be deleted.	161/7235	Persimmon Homes (Yorkshire)

Draft Consultation Statement & Schedule of Responses (2010)

	Objects to any reliance on windfalls unless there are justified circumstances as contrary to government policy. It is a function of planning to plan for delivery, not to hope that a sufficiency of sites will materialise at some unspecified point in future. Since SHLAA study is incomplete, and no work commenced on establishment of <u>draft</u> Green Belt boundary, it is premature to argue that a windfall allowance is necessary at this stage. Windfalls should be treated as a bonus, allowing Council to exceed its minima target.	165/7268	Home Builders Federation
	Reference to windfalls should be removed as suggests will need to rely on this to meet future development needs over LDF period. This is not consistent with PPS3.	2517/7887	Lands Improvement
SP1 - A Sustainable Settlement Hierarchy	Documents state that rural villages need to be protected. Vitally important that historic core of village is not spoilt. Villages are best protected, by preventing development of surrounding Green Belt, particularly with additional housing. This would result in additional pressure on roads, particularly Main Street. Proposed new, and larger, Park and Ride facility at Askham Bar could make this even worse. Drainage in much of village is not good, and additional housing would exacerbate this. Village school is already at capacity. Any large influx of additional pupils would alter management structure of school. Other facilities would also be put under increased pressure. Possibility of building on land to rear of burial ground is particularly worrying. Site is on very edge of village with hardly any passing traffic.	65/7225	Copmanthorpe Parish Council

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP1 - A Sustainable Settlement Hierarchy continued	Would be irreparably damaged by a large housing estate at other side of rear boundary hedge. Currently Copmanthorpe has a stable balance of housing types, which is likely to be upset if proposed development goes ahead. Strong feeling of community here would be compromised if it were to become any larger.	65/7225 continued	Copmanthorpe Parish Council continued
	Concerned that Upper and Nether Poppleton nominated as Local Service Centres earmarked for possible development, albeit limited, in proportion to size. Nether Poppleton has already expanded greatly during past twenty years and further development would, risk destroying forever its unique character. Opposed to any further major development within or on immediate outskirts of village.	79/8215	Nether Poppleton Parish Council

	Not aware Strensall with Towthorpe was recommended to be Local Service Centre. Roads are congested; school is full to over-flowing; and medical centre hard pressed. Most residents look to Haxby as their Service Centre as has more types of shops compared with few in Strensall. Sewage system is antiquated and inadequate. A particular problem is open spaces for recreation. LDF covers next 20 years but services covered in Sustainability Appraisal generally will have to be provided before any population increase. Concerned that classification as a Local Service Centre rather than a rural village is based on misinformation or out of date information. E.g. Available facilities are concentrated in areas, which are considerable distances apart; No public off-street car parking anywhere in parish and village centre is congested for much of day. Neither is there a capability to provide such a facility within walking distance of outlets; Limited retail facilities in village centre. Library has restricted opening hours; Capability of Medical Centre and School to cope with increased numbers must be taken into account before further development is allowed; Although have been large scale developments in Strensall has been no increase in green spaces since mid 1980's; Leisure provision is limited; Public transport is limited; Strensall is in catchment area for Huntington Secondary School and is an attraction to young families to live but this has had effect of building a dormitory society rather than a community due to lack of local employment opportunities. Facilities do not compare with those provided at comparable town of Haxby. As total score in SA is only 1 above cut off point for categorising Strensall/Towthorpe, as a Local Service Centre rather than a Village, would like this aspect to be reconsidered.	85/7226	Strensall & Towthorpe Parish Council
	Noted mention is made of villages of Upper and Nether Poppleton being nominated as Local Service Centres and earmarked for possible development, albeit limited, in proportion to size. Future developments in village should stick to design guidelines laid down in Poppleton Village Design Statement, which has been incorporated as SPG.	86/8216	Upper Poppleton Parish Council

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP1 - A Sustainable Settlement Hierarchy continued	Supports overall settlement hierarchy. However, to ensure Core Strategy remains strategic, paragraph providing additional justification to Section (i) should be removed as simply repeats national and regional guidance. Additionally, giving specific reference to Acomb as a District Centre in policy provides a detailed approach that would be better placed in Allocations DPD, which will be appropriate document to identify and justify identification of number of individual District Centres located within Sub-Regional City of York. Objects to inclusion of word 'limited' within policy justification in Section (ii). Limited development would not provide required level of development to ensure Local Service Centres future sustainable growth. Supports identification of District Centres, particularly Haxby, and agree the settlement has a key role in delivering the necessary services for sustainable growth. Recommend removal of second paragraph from justification to Section (i) (From "Within the Sub-Regional City" to "and other services"). Suggest amendment to justification text to Section (ii): - "The role of Local Service Centres will be enhanced to ensure their sustainable growth through the provision of development proportion to their size and with regards to supporting economic diversification and meeting the needs for both market and affordable housing".	161/7236	Persimmon Homes (Yorkshire)
	Supports broad Hierarchy. In particular, York should provide main focus for majority of new housing and other development, reflecting its status as a Sub Regional City. Principle of Local Service Centres being focus of limited development is supported in broad terms. However, not appropriate to direct equal growth to each settlement. Haxby has potential to accommodate most housing and other growth and development followed by Upper and Nether Poppleton and Strensall. Settlement hierarchy should reflect this	164/7253	Hogg Builders (York) Ltd
	Villages are important to rural, green setting of York. Retaining and improving their quality is important if they are to continue to fulfil this function effectively. Retaining village identity is part of this quality of life. For any additional housing proposals, consideration has to be given to the villages remaining separate, distinct from York and to be small scale, proportionate to existing, able to be absorbed into village community. The Poppletons should not be proposed as local service centres. They are no more sustainable than, for example, Dunnington, Copmanthorpe, Bishopthorpe, Strensall, in the facilities they offer. York Northwest when developed will, presumably, be a sustainable development. Its proximity to the Poppletons mean there is no need for them to be labelled in this way. Employment sites surround them, which on paper gives them edge over other villages in sustainable terms. However, York Business Park will relate more to a sustainable York Northwest, and hopefully an expanded Northminster will not happen.	203/7297	Ms J Hopton

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP1 - A Sustainable Settlement Hierarchy continued	Broadly supports four-tier settlement hierarchy. However, York Northwest (in particular York Central) should also be identified as a focus for retail, leisure and office development, alongside city centre, Point (i) should be revised to read: - "...Within the Sub Regional City, York City Centre and York Central are identified as the main foci for retail, leisure and office employment. Acomb is identified as a District Centre with a key role in delivering District retail facilities and other services".	214/7308 621/7354	Network Rail National Museum of Science & Industry
	In terms of identifying where smaller settlements should sit within Settlement Hierarchy, no assessment appears to have been made of how much further development each might accommodate before their character or landscape setting is irrevocably harmed. Whilst Upper and Nether Poppleton may fulfil function of a Local Service Centre, given that they are entirely surrounded by countryside which is considered to contribute to special character and setting of historic city (and which is, as a result, proposed to be defined as Green Belt), it is not clear why these villages are identified as settlements which <i>"will have limited development in proportion to their size"</i> . Given significant constraint upon peripheral development, would seem more appropriate to include them in category (iii) Villages.	242/7420	English Heritage
	York rightly identified as main focus for new development. In terms of remaining settlements identified within hierarchy there are no comments. However, such settlements are subject to development limit/inner Green Belt boundary that will determine extent, and capacity, of them to accommodate housing needs required.	331/7471	Taylor Wimpey (UK) Ltd
	Support intention that City of York will be main focus for majority of new development, although consider York Northwest, and particularly York Central, could also be identified as a main focus for retail, leisure and office development alongside city centre. Would be useful, if proportionate split of development between sub-regional city of York, local services centres, villages and small villages was indicated. This would give clarity to policy and emphasise how development will be distributed down spatial hierarchy.	479/7730	Yorkshire Forward
	Earswick should be redefined as a Village given its sustainable location and services including excellent transport links. Role of settlements such as Earswick should not be ignored in providing some capacity for further housing growth, particularly where sites are located adjacent to excellent public transport links to local services and employment. York as a whole is highly constrained by factors such as historic landscape and floodplain. Settlements such as Earswick are more than capable of providing a sustainable location for new development (particularly housing) whilst avoiding land, which floods or could harm, historic setting to City. The village has been subject to some expansion in recent years with development of 'Whitelands' and 'Garden Village' schemes to north end of Earswick.	605/8103	Mrs Barker

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP1 - A Sustainable Settlement Hierarchy continued	It is this end of village that offers best scope for some limited additional development to round off settlement and to ensure village services remain viable into future and also to expand upon choice and type of housing available. Land surrounding and adjacent to Fossbank Farm shows significant potential for a limited expansion of Earswick and creation of a far more defensible Green Belt boundary due to presence of a long avenue of mature Poplar trees.	605/8103 continued	Mrs Barker continued
	Support.	607/7774	CEMEX
	Oppose including Upper and Nether Poppleton as Local Service Centres.	2273/7810	Clr I Gillies
	Agree with hierarchy presented on condition that new development within Sub-Regional City area will be carefully controlled in terms of its emissions of oxides of nitrogen. These must be kept to an absolute minimum through active implementation of a LES. This will be essential to prevent further unacceptable deteriorations in local air quality and extension of existing AQMA.	2291/7813	CYC Environmental Protection Unit
	Would like to work with Council to investigate implications of development in local service centres and villages, e.g. inclusion of Dunnington will lead to increased congestion at A64 junction with A1079 and A166.	2434/7842	Highways Agency
	Support identification and inclusion of Upper and Nether Poppleton as a Local Service Centre.	2500/7860	Northminster Properties
	Support overall settlement hierarchy. However, to ensure that Core Strategy remains strategic in its focus paragraph providing additional justification to Section (i) of policy should be removed. Identification of City Centre as main focus for retail, leisure and office employment simply repeats national and regional planning guidance. Giving specific reference to Acomb as a District Centre provides a detailed policy approach better placed in Allocations DPD.	2517/7888	Lands Improvement
	Supports broad hierarchy. (ii) This is supported in broad terms. However, despite all Local Service Centres being within same tier, not appropriate to direct equal growth to each settlement. Haxby has potential to accommodate most housing and other growth and development out of Local Service Centres. Hierarchy should reflect this.	2524/7924	Barratt Homes (York) Ltd
	Unclear and confusing from structure how will operate. E.g. identified Acomb as a District Centre and then Haxby as a Local Service Centre and a District Centre. No defined role for a District Centre in RSS. Policy YH7 of RSS places accessibility to services and opportunities at forefront of considerations putting particular emphasis on value of existing infrastructure. SP1 fails to replicate approach by attaching no weight to accessibility when identifying hierarchy, which is therefore detrimental to sustainable locations. Local Service Centres of Haxby and Wigginton, Strensall/Towthorpe and Upper and Nether Poppleton are in reality part of York Urban Area, connected by sustainable transport modes to City Centre, which is where Sub-Regional Centre function is located.	2527/7940 2528/7964 2537/7988 2688/8012	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP1 - A Sustainable Settlement Hierarchy continued	Despite this first line of SP1 fails to acknowledge this by effectively excluding them from playing a part in city's growth. This is at odds with RSS. Not clear how centres at Clifton Moor and Monks Cross fit into hierarchy, particularly given Council's preferred areas of growth. This is a significant omission. As worded approach to Local Service Centres is unduly restrictive with use of the word limited to inform amount of development which will be allowed. Negative from outset, not justified by any evidence base and should be removed. Sub-regional city function should be limited to City Centre and not extended to remainder of City. It is City Centre, which forms regionally significant, centre and not appropriate for less sustainable suburbs to be afforded same status. Reflecting its importance as a stand alone sustainable location Acomb Centre should be identified as a Local Service Centre alongside Haxby and Wigginton, Strensall/Towthorpe and Upper and Nether Poppleton. Regard needs to be had to role of other local centres and important role of major employment locations, which current SP1 fails to affix enough weight to. Should be revised along following lines, which will provide an open framework that can be used to guide identification of development sites in a suitably flexible manner. Expect Council to provide a more detailed assessment of what locations can fulfil in each step in hierarchy: - "Within the City of York accessibility to the following hierarchy of centre and service will help guide the location and scale of development: - • The Sub-regional City of York • Local Service and Employment Centres Acomb, Haxby, Strensall/Towthorpe, Nether and Upper Poppleton [Monks Cross and Clifton Moor] • Villages and Smaller Service Centres • Small Village Centres"	2527/7940 2528/7964 2537/7988 2688/8012 continued	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq. Continued
	Agree that sub-regional city area should provide main focus for majority of new development.	2540/8035	National Grid Property
	Area West of Usher Lane and North of Haxby – Is Green Belt land; A local school recently closed; Development would saturate access – currently traffic at rush hour queues back into Haxby up York Road – inappropriate; Traffic would have to negotiate conflicting vehicles trying to reach only school; Heavy rain in North Haxby results in flooding as drains can't cope; Use windfall or brownfield sites first.	2684/8105	Mr R G Kimberley
	Monks Cross should be added to Sub-Regional City as a District Centre.	2689/8142	Monks Cross North Consortium

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP1 - A Sustainable Settlement Hierarchy continued	Support.	2696/8181	Thomlinsons Solicitors of Wetherby
	Settlement hierarchy is supported. York should provide main focus but to ensure this is achieved must require allocation of sufficient development land to deliver Vision's objectives and identification of revised Green Belt boundaries that will endure for many years thereby providing a sense of permanence. Should also include a "safeguarded land" policy so that Allocations DPD can identify areas to be safeguarded for future development beyond plan period.	2698/8230	Commercial Estates Group and Hallam Land Management
SP2 - Areas of Constraint	Largely supports each of four identified criteria. To ensure these are applied appropriately, believe that each site should be assessed against criteria to identify specific role that a site would have on City's historic character, nature conservation and green corridors. Identified Green Belt & Landscape Character Areas cover large areas of City and include smaller areas of land, which, if developed appropriately, would not have an adverse impact on the purpose of these designations. In selection of future development sites, rather than simply excluding sites using a blanket approach, Council should assess each site on an individual basis in order to evaluate role and purpose of site in respect of its value and impact on wider landscape areas. Landscape Assessment was published in 1996 and Green Belt Appraisal was published in 2003. Consequently, need to assess impact of a site's development against purpose and value of one of City's character areas is important given that since original identification context of these areas may have changed by amount and type of developments that have taken place over last 16 years and changing development requirements. Guidance presented in landscape character appraisals needs to be considered in context of current and future development needs up to 2030, not what they were in 1996 or 2003. Initial assessment of a site should be based on identifying what potential benefits a site could provide in respect of sustainability and integration with existing settlement pattern, followed then by whether site would have an adverse impact on value and purpose of large landscape areas. To ensure a large number of sustainable development sites are not excluded simply due to being located in one of large landscape areas, recommend following wording be included at end of Spatial Principle 2: "The Council acknowledges that not all sites located within the City's identified character areas, if developed, would have an adverse impact on the value and purpose of the City's character areas."	161/7237	Persimmon Homes (Yorkshire)

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP2 - Areas of Constraint continued	To ensure the identification of sustainable development sites, the Council will assess sites on an individual basis to identify the potential planning benefits in relation to their sustainability and integration with the existing settlement pattern, followed then by whether the site would have an adverse impact on the value and purpose of the City's large landscape areas."	161/7237 continued	Persimmon Homes (Yorkshire) continued
	Bullet point (iii) would benefit from reference to undertaking PPS25 Exception test where relevant, and bullet point (iv) would benefit from re-drafting to ensure sufficient flexibility, so it reads: "As far as possible, they do not have a significant adverse effect on the diversity of wildlife and habitats in the York area including nationally and locally significant nature conservation sites along with regional, district and local level green corridors, and adequate mitigation can be provided where appropriate" .	214/7309 621/7355	Network Rail National Museum of Science & Industry
	Endorse requirements for identifying areas for future development. However, given that not all developments will necessarily both "preserve" and "enhance" City's historic environment, Criterion (ii) should be amended to read: - "They ensure that those elements which contribute to the City's unique historic character and setting are preserved or enhanced" .	242/7421	English Heritage
	Name "Areas of Constraint" is somewhat misleading in terms of actual content and context of policy itself, which in fact seeks to identify reasonable criteria against which suitable sites would be considered for allocation. General approach is reasonable and consistent with broad planning principles. However title of policy suggests a more negative approach in terms of actually identifying sites, which should not be developed rather than a more pro-active approach to identifying and allocating land to meet required development needs for district.	331/7472	Taylor Wimpey (UK) Ltd
	i) Replace word "unacceptable" with "increased" . In light of weakness of transport section, need more clarity on what 'unacceptable' is supposed to mean. iii) Add after "and other water courses" "and rising groundwater due to increased run-off" . iv) Add at end "local nature reserves and sites of high local amenity value" . Should also include extra point: - "they do not have an adverse effect on the provision of good quality agricultural land in the plan area" .	458/7562	York Green Party
	Need for reference to suitable and appropriate location of sites in relation to: - potential noise sources such as road, railways, and industrial/commercial developments; past industrial activities and potential for land contamination. Point (i) should to refer to impact on total emissions rather than resultant air quality and amended to read after "congestion", "and /or emissions of oxides of nitrogen and carbon dioxide" .	2291/7814	CYC Environmental Protection Unit

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP2 - Areas of Constraint continued	Request more detail on statement relating to accessibility to sustainable modes of transport. What level of accessibility is acceptable and is this level in line with accessibility analysis set out in RSS. Request following be added to point (i) between “congestion” and “pollution”: - “on the local or Strategic Road Network” .	2434/7843	Highways Agency
	Should include explanation as to what factors led to the previously identified "reserved land" to west of A19 and south of A64 being excluded as a preferred area of search. Land around Designer Outlet Centre and aforementioned reserved land meet all of criteria in SP2. Currently proposed Green Belt boundary around Designer Outlet Centre not consistent with other similar allocations of major developed sites in Green Belt. Designer Outlet Centre major developed site allocation has been drawn tightly around developed building footprint as opposed to around site boundary as has been for other major developed sites in Local Plan. Boundary needs to reflect actual development on ground in terms of Designer Outlet Centre and surrounding car park as well as existing park and ride facility, and should reflect implemented planning permission.	2507/7910	Dobbies Garden Centres PLC
	Supports recognition that development will be needed from outside the existing settlements and prioritised towards locations accessible to sustainable modes of transport. Largely supports each of four identified criteria. To ensure these are applied appropriately should be assessed on a site-by-site basis in order to identify specific role a site would have on City's historic character, nature conservation and green corridors. Green Belt & Landscape character areas cover large areas of City and consequently include smaller areas of land which, if developed appropriately, would not have an adverse impact on purpose of these designations. Rather than excluding sites using a blanket approach should assess each site on an individual basis. Landscape Assessment was published in 1996 and Green Belt Appraisal in 2003. Guidance needs to be considered in context of current and future development needs up to 2030, not what they were in 1996 or 2003. Following wording should be included at end: - “The Council acknowledges that not all sites located within the City's identified character areas, if developed, would have an adverse impact on the value and purpose of the City's character areas. In order to ensure the identification of sustainable development sites, the Council will assess sites on an individual basis to identify the potential planning benefits in relation to their sustainability and integration with the existing settlement pattern, followed then by whether the site would have an adverse impact on the value and purpose of the City's large landscape areas.”	2517/7889	Lands Improvement

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP2 - Areas of Constraint continued	Takes an overly negative outlook, which does not encourage a positive holistic approach to guiding development sustainably leaving it at odds with PPS3 and RSS. Could be reworded to better support appropriate growth of City. E.g. could offer support for proposals, which would and could be sustainably integrated to city by sustainable transport.	2527/7941 2528/7965 2537/7989 2688/8013	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Agree that development sites or future areas for development both within and outside existing settlements should be subject to ensuring that locations meet requirements outlined in Policy.	2540/8036	National Grid Property
	Agree with principles, title needs to be “ Area of Opportunities ” as policy is not constraint led.	2689/8143	Monks Cross North Consortium
	Good starting point for Allocations DPD to undertake a sieve exercise. Topic Paper 1 states only land within outer ring road should be considered, for purposes of spatial strategy, in its capacity for urban extension. This aspect not supported. Limitation of future development within outer ring road will result in further urban cramming and prejudice historic character and setting of York, which is in conflict with (ii). (iii) Addresses management of flood risk resulting from new development but not locating development within current flood risk zones 3a and b.	2698/8231	Commercial Estates Group and Hallam Land Management
SP3 - Approach to Future Development	The sequential approach in Policy SP3 suggests that all development will be assessed in terms of a York main urban area first focus. While for the majority of development this is likely to be the case and is supported as being in line with the RSS settlement hierarchy, it has the potential to ignore development necessary to enable other settlements to fulfil their roles. Linked to this we are interested that you have allocated levels of development between settlements through the sequential approach. Other authorities have been more driven by the individual visions of settlements and the plans approach to meeting their needs and opportunities. The impression that we get from the spatial strategy is that the Core Strategies distribution of housing is reliant mainly on land supply opportunities and the sequential approach. We would welcome discussing whether this is your intention and suggest that you try and separate strategic development needs from local needs in this section so as to avoid SP3 being an overly restrictive policy in settlements outside of the main urban area. It is not clear why there is no distinction made between the level of Local Service Centres and Villages in the sequential approach in Policy SP3.	2/	Local Government Yorkshire & the Humber
	Insufficient open space in Huntington area at present for public access and any use of green field sites will reduce potential/opportunity for development of and/or recreational and leisure facilities in future.	75/7220	Huntington Parish Council

	Strongly objects to sequential approach identified. Re Section (i) (a), acknowledges that development of brownfield land can be prioritised over Greenfield sites. Believe that Council must also ensure that brownfield sites are assessed against same criteria as Greenfield sites in respect of other objectives of plan in relation to nature conservation, green infrastructure or recreation. Especially pertinent given that brownfield sites have a number of physical constraints in relation to their previous use. Need to give specific thought to a site's previous use, potential use and a full assessment of planning implications associated with development, including access to site and whether it is situated in a sustainable location. These should be fully assessed in evaluation of deliverability of large brownfield sites at York Northwest. Objects to structure of sequential approach identified in SP3. As currently worded is not in accordance with RSS Policy YH7. Principle aims to guide sequential approach of identification of future development across entire City of York area. RSS Policy YH7 provides a sequential approach based on the identification of land in identified settlements. Using settlement hierarchy identified in SP1, policy should provide a sequential approach for future identification of land for each tier of settlement hierarchy, rather than City of York as a whole.	161/7238	Persimmon Homes (Yorkshire)

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			

SP3 - Approach to Future Development continued	To ensure SP3 provides a policy approach that can be delivered and managed appropriately, it should provide specific development distribution levels that will be apportioned to each of identified tiers in settlement hierarchy. This requirement is identified by policies YH4 and YH7 of RSS. Is particularly pertinent in respect of future housing development. None of Spatial Principles presently provide this guidance. This should be set out in SP3. Recommend that existing SP3 be replaced by following policy approach: - "In accordance with the settlement hierarchy identified in Spatial Principle 1, and in accordance with the policy approach set out in Spatial Principle 2, the following sequential approach will be taken to meeting the identified spatial distribution of York's future development needs in the period 2008 to 2030: - • The Sub-Regional City - about 85% of the district's future development given that York will provide the main focus of the majority of new development. The required amount of future land for development in the Sub-Regional City will be identified as follows: - ▪ First Priority to the re-use of previously developed land and buildings and the more effective use of existing developed areas within the City. ▪ Second priority to other suitable infill opportunities within the City. ▪ Third priority to extensions to the City. • Local Service Centres - about 10% of the district's future development given that the roles of Haxby & Wiggington, Strensall/Towthorpe and Upper Nether Poppleton will be enhanced to ensure their sustainable growth through the provision of development in proportion to their size and with regards to supporting economic diversification and meeting the needs for both market and affordable housing. The required amount of future land for development in Local Service Centres will be identified as follows: - ▪ First Priority to the re-use of previously developed land and buildings and the more effective use of existing developed areas within Local Service Centres. ▪ Second priority to other suitable infill opportunities within Local Service Centres. ▪ Third priority to extensions to Local Service Centres. • Villages - about 3% of the district given that the roles of the villages of Bishopthorpe, Copmanthorpe, Skelton and Dunnington are appropriate for small-scale redevelopment, infill or expansion which is appropriate in scale and nature of the settlements. This will also help support the viability of some of the existing facilities or addresses local needs, such as affordable housing. The required amount of future land for development in the villages will be identified as follows: - ▪ First Priority to the re-use of previously developed land and buildings and the more effective use of existing developed areas within the identified Villages.	161/7238 continued	Persimmon Homes (Yorkshire) continued

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			

SP3 - Approach to Future Development continued	▪ Second priority to other suitable infill opportunities within the identified Villages. ▪ Third priority to extensions to the identified Villages. • Small Villages - about 2% of the district given that the roles in those villages and settlements not identified above, growth will be restricted to redevelopment and infill only. The required amount of future land for development in the small villages will be identified as follows: - ▪ First Priority to the re-use of previously developed land and buildings and the more effective use of existing developed areas within the identified Small Villages. ▪ Second priority to other suitable infill opportunities within the identified Small Villages. ▪ Third priority to extensions to the identified Small Villages.	161/7238 continued	Persimmon Homes (Yorkshire) continued
	Supports broad approach. However, SP3(i)(a), should be amended to make clear that greenfield sites can be given priority to previously developed land if their release would result in a more sustainable pattern of development. Such an approach is consistent with the guidance in PPS3.	164/7254	Hogg Builders (York) Ltd
	Fully support SP3(i)(a), in particular statement about potential offered by York Northwest area in second paragraph. Should be made clear within text that York Northwest will contribute to meeting housing need, whilst York Central specifically will also contribute to meeting not only housing needs but also the City's economic and retail needs.	214/7310 621/7356	Network Rail National Museum of Science & Industry
	Proposed sequential approach more appropriately reflects that previously adopted within PPG3. This approach has not been carried forward in same vein within PPS3, which refers to key principles of housing sites being suitable, achievable and deliverable. Proposed policy approach is too rigid and potentially out of date which would conflict with tests of soundness. In particular does not address matter of deliverability. At this stage, policy would result in an inflexible approach to release of housing land, which does not consider delivery nor potential for expansion of urban area which in many cases will prove to be more suitable and sustainable than development of sites within smaller settlements and in particular villages. Policy approach needs to be amended to accord with current national policy guidance.	331/7473	Taylor Wimpey (UK) Ltd
	Approach is consistent with sustainability objectives of PPS1. Support land identified as potential future Area of Search at Monks Cross Huntington for housing shown on Key Diagram.	370/7485	Trustees for Monks Cross Shopping Park
	c) Don't support.	458/7563	York Green Party
	Support sequential approach. However, may be some circumstances where a lack of accessibility by public transport to brownfield or infill development sites, particularly in small villages, may mean new greenfield development is more appropriate in meeting sustainability objectives. Consideration should be made within policy with regards to accessibility of site and implications on this for suitability of adhering to sequential approach in all instances.	479/7731	Yorkshire Forward

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			

SP3 - Approach to Future Development continued	May be instances where urban sites are unsuitable for certain types of development and use of rural sites is more appropriate. Should include previously developed land/brownfield development outside of villages. Existing employment uses should include vacant sites that have previously been used for employment purposes.	515/7495	UK Coal Mining Ltd
	a) Support. Urge Council to ensure appropriate flexibility in policy framework for York Northwest, and that redevelopment of these sites should be guided by York Northwest APP	525/7511	Associated British Foods plc
	Agree future development should be brought forward initially on brownfield sites within Sub Regional City of York. Following should be noted: - • If past industrial activities are identified onsite, or in immediate vicinity, then site must be investigated for land contaminated and remediated prior to redevelopment. • Any development within Sub Regional City of York should aim to have zero impact in terms of its emissions of carbon dioxide and oxides of nitrogen. Where cannot be achieved on site itself, contributions must be made by developer towards undertaking of other emission mitigation measures elsewhere in city. • There are some areas within existing AQMA where introduction of further exposure is currently not acceptable making infilling with 'relevant' locations unacceptable. These include residential properties, schools, care homes i.e. places where members of the public spend prolonged periods of time (does not include places of work). • Scale of development proposed on York Northwest site has potential to result in a considerable deterioration of local air quality across wide areas of city centre, particularly within existing AQMA. Whole site could be redeveloped as a Low Emission Zone (and part of an "Eco Quarter"). This would allow widespread development of site whilst minimising the air quality impact on the rest of city.	2291/7815	CYC Environmental Protection Unit
	Would like to see evidence for need for industrial and distribution related employment within York. Upper and Nether Poppleton are considered to have a significant impact on SRN. Further consideration of these sites should take into account following statement: - "A development of this size and in this location would have a significant impact on the Strategic Road Network, which would require mitigation. Improvements to the SRN are considered only as a last resort. Instead a range of sustainable transport options for people using the development needs to be developed through the use of travel plans." Would like to be involved in future analysis of clusters of potential sites to ensure that potential cumulative impact of sites is fully analysed at later stages.	2434/7844	Highways Agency

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP3 - Approach to Future Development continued	(i) (c) Policy is objected to. Use of word 'exhausted' is ambiguous. Implies that expansion of main urban area cannot take place unless brownfield and other suitable sites as identified in sustainable settlement hierarchy have been developed or are committed to being developed. Policy should be re-phrased to enable expansion of main urban area of York where deliverable brownfield sites have either been developed or are committed to be being developed. This will ensure that sequentially preferable approach to development is retained whilst providing sufficient flexibility to enable other sites to come forward where appropriate circumstances exist. (ii) General thrust of policy supported but wording is unduly restrictive as it omits reference to business uses. Such an omission effectively precludes expansion of existing business uses outside main urban area. PPS4 recognises that applications for extensions to existing town centre developments in edge of centre and out of centre locations can succeed subject to various policy tests being fulfilled. Future development proposals, at well established business parks, need to build on success of existing provision and continue to provide high quality sites to attract inward investment whilst helping to retain existing businesses. Policy should be amended to include business related employment to include B1 (a), (b) and (c) uses.	2500/7861	Northminster Properties
	Objects to SP3 as currently worded, given need for a flexible supply of deliverable land for housing, employment and leisure in a variety of sustainable locations. As currently worded Greenfield opportunities currently located outside main urban area of York, would be "pushed back" to end of plan period. However, timescales for bringing forward sites for development means that approach would effectively "stifle" development and would undermine purpose of PPS3, which seeks to ensure a continuous rolling supply of deliverable housing land. An inflexible approach as set out in SP3 would not deliver development needs of City of York. Need for flexibility if a "sequential approach" is to be taken forward in Core Strategy. Strongly objects to sequential approach identified. Whilst acknowledging that development of brownfield land can be prioritised over greenfield sites, believe must also ensure brownfield sites are assessed against same criteria as Greenfield sites in respect of other objectives of plan in relation to nature conservation, green infrastructure or recreation. Especially pertinent given that many brownfield sites have a number of constraints such as contamination, currently occupied, not commercially viable etc. in relation to their previous use and a full assessment of planning implications associated with their development, including access to site and whether situated in a sustainable location is needed. In particular in evaluation of deliverability of large brownfield sites at York Northwest.	2517/7890	Lands Improvement

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP3 - Approach to Future Development continued	Structure of sequential approach identified as currently worded is not in accordance with RSS. Policy should provide a sequential approach for each tier of settlement hierarchy, rather than the City of York as a whole and provide specific development distribution levels that will be apportioned to each of identified tiers in settlement hierarchy. Recommend that Policy SP3 is either deleted or amended as follows: - (Two recommendations for amended wording in representation – Page 17 and page 32) Amended wording 1: - “In accordance with the settlement hierarchy identified in Spatial Principle 1, and in accordance with the policy approach set out in Spatial Principle 2, the following sequential approach will be taken to meeting the identified spatial distribution of York’s future development needs in the period 2008 to 2030: - • The Sub-Regional City - 75% (14,025 Dwellings) – York will provide the main focus of the majority of new development. The required amount of future land for development in the Sub-Regional City will be identified as follows: - ▪ First Priority to the re-use of previously developed land and buildings and the more effective use of existing developed areas within the City. ▪ Second priority to other suitable infill opportunities within the City. ▪ Third priority to extensions to the City.” Also recommend a similar approach for Local Service Centre, small villages etc, with an appropriate distribution of housing numbers. Amended wording 2: - “(a) Where possible, by bringing forward development within the Sub Regional City of York (the main urban area) initially prioritising previously developed land and buildings. Development of greenfield sites will be considered appropriate where their development would not prejudice other objectives of this plan relating to nature conservation, green infrastructure or recreation. (b) Secondly, suitable infill opportunities within Local Service Centres and Villages (as identified in settlement hierarchy) which is appropriate in scale and nature and helps support viability of some of existing facilities or addresses local needs, such as for affordable housing. (c) Thirdly, expansion of the main Sub Regional City of York subject to the constraints highlighted in Spatial Principle 2.”	2517/7890 continued	Lands Improvement continued

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP3 - Approach to Future Development continued	Supports broad Approach. However, wording in SP3(i)(a) should be amended to make clear that greenfield sites can be given priority to previously developed land if their release would result in a more sustainable pattern of development.	2524/7925	Barratt Homes (York) Ltd
	Takes an overly simple generic approach to guiding development. Use of a strict sequential approach does not accord with Government Guidance. Should offer a more positive flexible and balanced approach to development focusing on sustainability in line with PPS12, PPS3 and RSS. Deliverability and flexibility are key considerations permeating through planning policy. Approach could prejudice delivery of sustainable planned development and be at odds with aspirations of PPS1 and PPS3.	2527/7942 2528/7966 2537/7990 2688/8014	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Agree with prioritising previously developed land and buildings for development within Sub Regional City of York. These sites offer most potential for York and Northwest area to meet City's economic, housing and retail needs.	2540/8037	National Grid Property
	(i) (c) Use of word "exhausted" is ambiguous. Implies that expansion of main urban area cannot take place unless brownfield and other suitable sites identified in hierarchy have been developed or are committed to being developed. This is inappropriate. Suitable brownfield sites may remain within main urban area but cannot be brought forward because of deliverability. As it stands would effectively preclude development of suitable deliverable land for a range of uses until more sequentially preferable (but not necessarily deliverable) sites have been committed. Considers location of land only and does not maintain sufficient flexibility to recognise issues over deliverability. Also, need to expand main urban area will be on a different scale to development within Local Service Centres and Villages, which will normally be limited to a scale proportionate to size to meet local needs. Expansion of main urban area should not be linked to sites within Local Service Centres and Villages as they serve a different purpose. Sequencing of settlement hierarchy should be re-ordered to retain priority to bringing forward development in main urban area first. Expansion of main area should then come second where deliverable brownfield sites in main urban area have either been developed or are committed to be being developed within a reasonable timescale. Separate, but concurrently, brownfield or infill development within Local Service Centres and Villages, which are appropriate in scale and nature should be permitted. Will ensure that sequentially preferable approach to development is retained whilst providing flexibility to enable other sites to come forward where appropriate circumstances exist.	2685/8107	Mr F R Pulleyn

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
SP3 - Approach to Future Development continued	(i) Word “Sequential” needs to be replaced with “ prioritisation ” to conform to PPS3 and RSS Core Approach. (a)(b) and (c) Reference to greenfield sites should be removed from (a) and then both (a) and (c) be combined to allow for City expansion sites to be progressed in early years provided their development would not prejudice other objectives of plan.	2689/8144	Monks Cross North Consortium
	Object as it appears to preclude development of any form of greenfield site in Local Service Centres and Villages. To meet Districts housing need and to provide a proper range and choice of sites will be appropriate opportunities for development of greenfield sites and limited expansion of certain Local Service Centres and Villages. Reference needs to be made to possible development of greenfield land within and on edge of such settlements.	2696/8182	Thomlinsons Solicitors of Wetherby
	Requires some flexibility adding to it to ensure delivery of required future development. E.g. greenfield sites should not be held back where brownfield sites are not viable for development and not coming forward or where greenfield sites are large and require significant lead in times to provide new or improved infrastructure and where there will be a protracted build out period. If these types of site are held back, will result in under delivery of Vision and identified development requirements.	2698/8232	Commercial Estates Group and Hallam Land Management
Paragraph 3.19	Concerns over how arrived at position that it is not anticipated that land will be required for the expansion of the Sub Regional City of York until beyond 2021. In particular, considered that future housing land supply position has not been informed by a robust SHLAA document that has been subject to consultations with key stakeholders including house building industry. As such, capacity of sites identified in SHLAA and assumed timescales for their delivery may not be robust. As a matter of principle, considered inappropriate to make judgments on when urban extension land may be required in absence of a robust evidence base that has been subject to consultation and approved by LPA.	164/7255	Hogg Builders (York) Ltd
	This section is unclear. A more dispersed strategy for delivery of development which does not place undue reliance on large strategic sites, particularly previously developed sites, will assist in achieving necessary supply of land for development.	546/7698 2510/7871	Miller Homes Ltd Taylor Wimpey UK Ltd
	Paragraph states that both existing draft Local Plan allocation and safeguarded land at Northminster Business Park could be used for purpose of general industrial and storage and distribution uses (B2 and B8) only however Policy CS9 also includes B1 (c) light industrial uses. Paragraph should therefore be amended to read consistently with Policy CS9.	2500/7862	Northminster Properties

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Paragraph 3.19 continued	Unclear as to how Area of Search C was selected. Reference to Area of Search C should be deleted and replaced by site at Land adjacent to A1079, Grimston Bar.	2517/7892	Lands Improvement
	Concerns over how LPA has arrived at position that “not anticipated that land will be required for expansion of Sub Regional City of York until beyond 2021”. Future housing land supply position has not been informed by a robust SHLAA that has been subject to consultations with key stakeholders including house building industry. Capacity of sites identified and assumed timescales for delivery may not be robust. Inappropriate to make judgments on when urban extension land may be required in absence of a robust evidence base that has been subject to consultation and approved by LPA.	2524/7926	Barratt Homes (York) Ltd
	Area of Search D (South of Moor Lane) should be added as an area of search for an urban extension as Areas of Search A and B will not provide amount of Greenfield land required. Endorse Area of Search C North of Hull Road is appropriate only for employment uses.	2542/8055	Moor Lane Consortium
	Support reference to inclusion of land East of Metcalfe Lane, Osbaldwick within an Area of Search for housing.	2685/8108	Mr F R Pulleyn
	Do not accept that Areas of Search ‘A and B’ will not be required until after 2021. Believe that the current stock of approvals will not deliver RSS requirement consistently year on year over next 5 to 10 years and as such, other sites will need to be brought forward. Monks Cross North Area of Search Area A should be brought forward in early years commencing with commercial land uses where it currently abuts existing employment park. Site should then allow for a smooth transition from pure employment to mixed-use and then pure residential as it progresses northwards over time towards outer-ring road. ELR identifies Monks Cross North site as most suitable area of employment land and an area that is likely to be required in early plan period. Text should be replaced with wording that recognises potential for mixed use in Area A and suggest development be permitted to progress in early years working northwards from existing District Centre in line with an agreed Development Brief.	2689/8145	Monks Cross North Consortium
	Overly prescriptive and too site specific and presupposes that areas identified as “Areas of Search” would be sufficient to meet development needs. This is a job for Allocations DPD not Core Strategy. If sites are needed within plan period should be allocated for development within Allocations DPD and further land identified as areas of search for development beyond plan period.	2698/8233	Commercial Estates Group and Hallam Land Management

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Paragraph 3.20	Specifically concerned with Area of Search A. How rigidly is strategy going to be put into practise? Will developers see implementation of Core Strategy as a green light for development of green field sites as limited restrictions have been placed upon such? If Areas of Search are noted as consideration for development after all other locations have been exhausted in 2021, why has a questionnaire been circulated to all residents of Huntingdon, requesting public opinion in relation to potential development of same Area of Search. This seems premature.	75/7221	Huntington Parish Council
	Unclear when land for development will be specifically allocated and why some strategic growth locations are included in Core Strategy, whilst others are left for consideration later within LDF. Allocations DPD will follow Core Strategy. Unclear whether Core Strategy will fix inner Green Belt boundary, and what criteria have been used to allocate some land for development within Core Strategy, but leave others for allocation within DPD. Allocation of more, suitable land within Core Strategy could aid delivery. A number of readily available medium sized strategic sites could be allocated in Core Strategy as advocated in PPS12. Could speed delivery of Strategy.	546/8319 2510/8321	Miller Homes Taylor Wimpey UK Ltd
Question 3			
	a) Draft inner Green Belt boundaries have no statutory status; only broad extent has through RSS. Role of LDF is to identify land for housing, employment, safeguarded areas for development beyond plan period and permanent Green Belt boundaries. c) & d) Have other areas been considered/ruled out? Is this an issue to be considered as part of the development of places along with the overall distribution of development? What do the SHLAA/Employment Land Study say?	1/7088	Government Office
	If boundary of Green Belt is to be changed, important to demonstrate that purposes and objectives of it are not undermined, and that opportunities to improve environmental quality of Green Belt are not lost. Advise that a review is undertaken prior to any decisions being made about allocating sites in existing Green Belt. This will help ensure a refreshed Green Belt that continues to contain urban growth while evolving to fit twenty first century circumstances, and deliver more positive benefits for the natural environment and people's enjoyment of it. While Green Belt is important to York's setting, will be important to ensure new development has access to appropriate levels of green space to meet the need of York's residents. Advise that all new housing developments should be of high environmental quality and incorporate green infrastructure. Should be achieved through requiring major new housing developments to be accompanied by a site based green infrastructure strategy. These can ensure the following are considered: Promoting healthier communities and narrowing health inequalities;	4/7123	Natural England

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	Providing opportunities for active and passive recreation, relaxation, social interaction, play and spiritual refreshment; Creating safer and stronger communities; Transforming local environment and ensuring sustainability; Meeting local needs more effectively; Promoting the economic viability of localities; Enhancing biodiversity and resilience to the effects of climate change; Securing people's connection with natural environment. Welcomes citing of Accessible Natural Greenspace Standard in Green Infrastructure. However, could also be referred to here. Access for pedestrians and cyclists over railway at York Northwest would help achieve this.	4/7123 continued	Natural England continued
	Overall distribution of development, focusing on main urban area, is welcomed and supported.	18/7172	NYCC
	a) Identifying land in the draft Green Belt for development does prejudice the outcome of a review of the Green Belt and could make the exercise less meaningful. b) Concerned about principle <i>"To prioritise brownfield sites, allowing Greenfield development only where development on alternative suitable brownfield sites is unviable or undeliverable. This will also help to establish a permanent Green Belt boundary in York."</i> Brownfield land can be very valuable for many types of species in particular invertebrate biodiversity. Sites need to be assessed carefully and if development is to go ahead mitigation will be needed if biodiversity interest is present. c) Concerned at inclusion of area of land next to Moor Lane (Area D) for potential development. The proximity of this area to Askham Bog Reserve would have considerable effects on the integrity of the reserve. The recent planning permission given for the new Askham Bar Park and Ride adjacent to the reserve has already meant that in the future the reserve will be less connected to open countryside. Given the large number of sites which are already due to be developed in York it is possible that developing more sites will lead to overdevelopment of city. A capacity assessment of, in particular, the transport network could be essential.	49/7184	Yorkshire Wildlife Trust
	a) No as there is so much brown field land available. b) Understand that spatial strategy is determined by overlaying areas of constraints, such as flooding, green infrastructure and green belt character areas with the sustainable settlement hierarchy. Do not consider this approach has been applied comprehensively to Fulford. c) No not appropriate to identify land in Green Belt and do not think that areas A & B are suitable for housing allocation. d) No not appropriate to identify land in Green Belt and do not consider area C suitable for employment allocation.	70/8198	Fulford Parish Council
	d) Area C is supported. Area I is not supported.	110/8296	York Civic Trust

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	Supports identification of land for future housing development. Release of existing draft Green Belt land is fundamentally required to provide Council with ability to maintain a rolling 5-year supply of deliverable land to meet minimum RSS housing requirements. Supports identification of southern section of Area A as a suitable location for future residential development. However, believe that to ensure a flexible supply of deliverable housing land, will need to release additional land to that already identified within Areas A and B. Provision of development in a variety of locations will appeal to a wider market, help meet local demand and generate a more even supply of houses to meet needs. Draft SHLAA identifies that in order to meet RSS housing land requirements, Council will need to release a number of sites within draft Green Belt. Areas A and B will not provide a sufficient number of dwellings to meet current and future needs, and not offer sufficient choice of location. Additional land will need to be released to that already identified. Based on evidence in draft SHLAA need to identify additional sites to provide a further 2,709 dwellings order to meet RSS requirements for period 2008 to 2030. Considering current housing market and fact every single site identified will not be delivered over LDF period, there is strong case that Council will need to identify even more sites than those required to meet the presently identified 2,709 dwelling short fall. Because of requirement to focus majority of new growth within Sub-Regional City of York and identified Local Service Centres, proposed that 2,709 dwelling short-fall should be reconciled through release of additional deliverable residential development sites located in draft Green Belt in these settlement areas. To ensure that Council can meet the City's current and future housing needs, recommend that following sites be identified for release for residential development: - South of Moor Lane, Dringhouses (Other Area of Search D); Usher Park Road, Haxby (Located in proximity to Other Area of Search G); Ponds Field, Field Lane, Heslington (Located within Main Urban Area of Sub-Regional City); Askham Lane, Woodthorpe (Located within Other Area of Search E); Westfield, Wigginton; and Common Lane, Heslington. See representation for further detailed information supporting sites.	161/7233	Persimmon Homes (Yorkshire)
	a) Entirely appropriate to identify land in draft Green Belt for housing development. c) In broad terms, areas A and B are most suitable for housing led urban extensions	164/7256	Hogg Builders (York) Ltd
	a) Crucial land for development in draft Green Belt is allocated for housing and employment as only way York will see any future growth and provide jobs and homes that people require. b) Principles are correct.	198/7281	The Helmsley Group

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	c) Agree these areas are suitable but some of villages such as Dunnington, Skelton, Copmanthorpe and Bishopthorpe should be allowed to expand to support services, schools etc because they are already on good transport routes. d) Agree these areas would be suitable.	198/7281 continued	The Helmsley Group continued
	a) Yes only when existing brown field sites are utilised. b) Approach is fit for purpose. c) Agree with approach and areas A and B are most suitable. d) Agree with approach using C/I and consequently no alternative locations.	218/7397	Northern Gas Networks
	In terms of general approach wholly appropriate that, before identifying broad strategic directions for growth, extent of Green Belt that is necessary to safeguard special character of historic city is defined. a) Given that boundaries of Green Belt around York have never been formally defined, it is appropriate, as part of development of LDF, to identify sites in current draft Green Belt for housing and employment purposes. However, needs to be clearly established that any areas which are ultimately removed from draft Green Belt do not fulfil any Green Belt purpose set out in PPG2 especially that of safeguarding setting and special character of historic city. b) Broadly concur with Spatial Principles. c) Given that Council has yet to set out what it considers to be elements which contribute to special historic character and setting of York, not possible to determine to what extent loss of currently open areas at Monks Cross and Osbaldwick might impact upon Green Belt in those areas or character or setting of City. Unclear how peripheral development on north-eastern and eastern sides of York can be reconciled with Policy CS1 that <i>"areas ... which provide an impression of a historic city situated within a rural setting"</i> should continue to remain open in order to safeguard special character of York. Re Area A, Green Belt Local Plan Inspector stated: - <i>"Since the construction of the Ring Road views from that road are of especial significance.... I consider that in general there would be serious harm to views of the city from the Ring Road if development were permitted to come right up to it"</i>. d) Same comment as c) but in relation to Hull Road & Northminster Business Park and Area C.	242/7419	English Heritage
	Yes. See comments to Question 4. (Ref 276/7440)	276/7439	Askham Bryan College
	Should relate to requirement to meet identified need for housing, employment and other community facilities (including educational provision) as set out in RSS. Should be sufficient flexibility to allow for future change. May mean appropriate to release land from Green Belt to meet needs. Green Belt release can be suitable for uses other than housing and employment.	282/7445	York College

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	a) Land allocated in draft Green Belt less likely to benefit from existing infrastructure. Housing and employment sites would almost certainly require new on and off site sewers and water mains. Sites allocated would need to be phased to coordinate with Yorkshire Water's infrastructure provision. No allowance for growth in these areas in 2010-2015 Business Plan. b) Part 3 of SP2 should also include surface water flooding as part of appropriate management to flooding. Currently only relates to fluvial flooding rather than fluvial and pluvial. c) & d) As part of joint work on Infrastructure Delivery Plan can examine current capacity within infrastructure in these areas. However, as these sites, if allocated, would be released later on, provision can be made for them in future investment periods. Providing Yorkshire Water are involved in discussions over these proposals would be able to accommodate either option.	320/7451	Yorkshire Water
	Potential Areas of Search B: East of Metcalf Lane and C: North of Hull Road located within vicinity of high voltage electricity transmission assets. National Grid own/operate Osbaldwick substation, adjacent to Area of Search C. Does not object to future redevelopment, but wishes to highlight substations are vital to efficient operation of electricity transmission network. Site is Operational Land and may be need for essential utility development in future. High voltage overhead electricity transmission lines cross both Areas of Search B and C. Need to be aware policy is to retain existing overhead lines in-situ. Relocation of these only supported where proposals directly facilitate major development or infrastructure project of national importance. This must have been identified by central government. Location and nature of existing electricity transmission equipment needs to be taken into account when planning developments. Buildings should not be built directly beneath overhead lines because of amenity of potential occupiers of properties and need for quick and easy access for maintenance. Statutory safety clearances between overhead lines, ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line important that these do not result in safety clearances being infringed. Seeks to encourage high quality and well-planned development in vicinity of high voltage overhead lines. Land beneath and adjacent to overhead line route should be used to make a positive contribution to development of site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court.	409/7491	National Grid

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	a) No, don't believe this is either desirable or necessary. b) Particularly concerned about identifying extensions to green wedges and implication that land outside these areas could be dispensable. Attention needed to protect agricultural land. c) No. Designation based on a model of excessive economic growth; don't believe needed and if are will represent damaging level of growth; Designation in existing draft Green Belt as areas for development could encourage applications to bring them forward ahead of designated time; d) Reservations about designating these sites: - Site I is not a sustainable location. Its situation in vicinity of proposed new park & ride is not an argument in its favour as an employment site. Will encourage additional traffic in an area which will already be suffering from higher levels due to park & ride; Site C would have similar features and take infill development right up to ring road. A trend, which should be avoided.	458/7564	York Green Party
	d) Will largely depend on results of transport modelling work, which will be needed to assess accessibility of area, and subsequent sustainability of any expansion of employment facilities.	479/7732	Yorkshire Forward
	a) Considers appropriate to identify land for development in draft Green Belt for employment to ensure RSS targets are met, and to sustain and develop York's economy. b) Whilst understands precautionary approach to development of sites outside of existing settlements, should be recognised that in some instances such sites can make important contributions to City's economic, social and environmental aims. Providing employment land within rural areas has potential to reduce need to travel for people living in surrounding rural areas, both within City of York boundary and beyond in adjacent rural areas. d) North Selby site is considered suitable for employment use. (See representation for site-specific information).	515/7494	UK Coal Mining Ltd
	a) Yes. Such land needs to be identified as part of a portfolio of suitable sites and available over plan period to maintain consistent supply. Previously developed land can often face greater challenges to delivery, which suggests need to balance provision of both greenfield and previously developed sites. Approach adopted in past and should continue to be used to maintain an appropriate supply of deliverable sites. b) Approach supported. Concern that settlements such as Strensall and Haxby are considered suitable for further growth. Development of any significant scale in these locations would encourage commuting in conflict with RSS and aims to concentrate development at York itself. Do not support SP3 insofar as it sets brownfield or infill development within Service Centres or Villages sequentially higher than greenfield development around York. Phased and proportionate development of greenfield land around York is not incompatible with strategy to deliver major strategic brownfield land.	546/7699	Miller Homes Ltd

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	c) Some land to west of City should also be identified on basis that: - would provide for a more balanced distribution of housing across City; would mean that development would be of a smaller scale and more readily absorbed area; could offer opportunities to enhance local infrastructure deficiencies; could reduce risks to delivery; ensure that affordable housing needs across wider parts of City could be met locally.	546/7699 continued	Miller Homes Ltd continued
	a) Appropriate that draft Green Belt is reviewed for purpose of accommodating both existing demand and future anticipated growth within LDF period. b) Lack of consistency in respect of employment provisions. RSS and other employment figures used in employment growth assessments are based on generically based figures i.e. including all forms of employment not just employment related to use classes B1, B2, B8. This identification is not used throughout and spatial principles are therefore at variance with other employment statistics elsewhere within LDF process. c) Release of residential development land should be better distributed around city within bypass limits e.g. land located west of A19 Fulford, section A should be extended to include land up to A1036. Will provide a more robust and diversified opportunity together with greater choice for purchases whilst distributing transportation demand to radial routes into/out of city with opportunity for alternative modes of transport based on, e.g. Park & Ride system. d) Area C is more suitable location of two areas for industrial and distribution employment. Area I would not readily accommodate influx of traffic. Other locations should be considered which have already capability to accommodate further growth with a lesser impact. E.g. Site adjacent to A19/A64 interchange.	568/7710	The Land and Development Practice
	a) May be appropriate to identify further land within draft Green Belt for housing and employment if purposes and objectives of Green Belt are maintained. In case of land at Earswick, limited rounding off of settlement to a stronger boundary would create a more defensible Green Belt boundary able to withstand long-term definition. b) SP1 should be amended to include Earswick as a 'Village' rather than a 'Smaller Village'. c) Land north of Earswick at Fossbank Farm should be considered for housing.	605/8104	Mrs Barker
	Both areas C and I could offer potential for development of freight transshipment/freight consolidation activities. Location C looks particularly promising as would be able to deal with HGV movements from both A64 and freight coming in from A1079. Also located close to existing lorry park at Murton. Both areas A and B are suitable locations for housing. Site A directly adjoins outer ring road and so noise will be an issue. Site B is located near to an industrial area and an area identified as a possible industrial and distribution employment area, and so noise will also need to be considered.	2291/8320	CYC Environmental Protection Unit

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	d) Suggest that Area of Search 'I' would be a suitable location for industrial and distribution related development as well as business related employment. (For detailed supporting information on including office use (B1(a)) see representation).	2500/7863	Northminster Properties
	a) Yes. Whether it is appropriate to utilise this land depends upon availability of other sources of land and need to deliver a consistent supply of land for housing over plan period. Previously developed land resources, as well as land not within draft Green Belt, may well provide an alternative supply in first instance. Previously developed land can often face greater challenges to delivery, which suggests need to balance provision of both greenfield and previously developed sites. Approach adopted in past and should continue to be used to maintain an appropriate supply of deliverable sites. b) Approach supported. Concern that settlements such as Strensall and Haxby are considered suitable for further growth. Development of any significant scale in these locations would encourage commuting in conflict with RSS and aims to concentrate development at York itself. Do not support SP3 insofar as it sets brownfield or infill development within Service Centres or Villages sequentially higher than greenfield development around York. Phased and proportionate development of greenfield land around York is not incompatible with strategy to deliver major strategic brownfield land.	2510/7872	Taylor Wimpey UK Ltd
	a) Supports principle, however, does not believe Council has identified a sufficient amount of land for housing to ensure maintains a rolling supply in accordance with PPS3. c) To ensure a flexible supply of deliverable housing land, as well as considering A and B should also be considering land adjacent to A1079. Taking into consideration significant changes that will have occurred in area as a result of University of York's Extension to south of site and recent park and ride development, area is no longer suitable to be included within Green Belt and could be released for development prior to 2014/2015 to ensure Council can maintain a 5 year rolling supply of deliverable residential development sites across City throughout LDF period. d) Objects to identification of Area C and Area I and non-inclusion of land adjacent to A1079. Objects to approach taken in Topic Paper 1 and findings of Employment Land Review 2009. Considers land adjacent to A1079 should be included as being suitable for B1(b) and B1(c), B2 and B8 uses. (See Representation for detailed site-specific information).	2517/7891	Lands Improvement

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	In general approach welcomed. a) LDF provides opportunity to define detailed inner and outer boundaries of Green Belt for first time. Land does not have to be identified for development in Green Belt as opportunity can be taken in course of preparation of LDF to draw boundaries to exclude land needed to meet development needs. This approach would not apply to those villages washed over by Green Belt or to Major Developed Sites in Green Belt where guidance in PPG2 would apply. b) Strategic sites could be given more prominence given their importance to delivery of Plan's key objective of focussing development in main urban area. PPS12 permits allocation of strategic sites in Core Strategy where central to achievement of strategy. A high level of detail should be avoided, but where they are to be included must include a submission proposals map. Where appropriate, site-specific criteria can be set out in an SPD. Core strategy is ambiguous as to status of 9 sites identified on Key Diagram. Some already have planning permission so outline boundaries could be identified. Others, such as Terry's site, have a development Brief that again allows site to be identified in outline. Given importance of Terry's site should be identified as a strategic site in Core Strategy. c) Approach as proposed identifies all the potential areas of search in north half of city. There may well be potential opportunities to south of City that are relatively close to city centre that could also be suitable for development at some point in future. This should be considered and if necessary, land safeguarded for longer-term development. d) Area C may well be suitable for industrial distribution and employment uses as is located on dual carriageway section of Ring Road. There are other sites suitable for different forms of employment that could also be identified. E.g. Terry's site is one of few immediate office development opportunities in City. Core Strategy could be more specific about importance of site in delivering high quality office accommodation as part of a mixed-use scheme.	2523/7915	Grantside Ltd
	a) As currently no statutory Green Belt around York, it is not appropriate to seek to apply principles of PPG2 when considering which sites to select for housing and other development. It is entirely appropriate to identify land in draft Green Belt for housing development. c) In broad terms considers that areas A and B are most suitable for housing led urban extensions. Also scope for an urban extension to north of Haxby, to meet housing needs.	2524/7927	Barratt Homes (York) Ltd

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	a) Yes. RSS indicates need for Green Belt to endure beyond plan period with consideration given to permanence of boundary. To do so appropriate that it is defined so as to achieve sustainable growth of York over next 30 years; this will necessitate development to take place on land identified within Draft Green Belt. This will enable Council to meet its RSS obligations. b) Fundamental difficulties with all options. Broadly appear to represent an overly regimented, in parts negative, interpretation and application of regional policy removing required flexibility, contrary to requirements of PPS12. c) No. Not clear from work undertaken in support of Consultation Document, particularly Topic Paper No 1, that areas A and B represent most suitable options. Believe will be necessary to identify more land around City to fulfil housing (and employment) land obligations for period of Core Strategy and beyond. This should be undertaken in a way, which satisfies key PPS12 tests of certainty, flexibility and deliverability and contribute to place making agenda. One concern appears to be suppression of SHLAA. Concerned that Council appears to have had little regard to SHLAA process, which is a planning neutral objective appraisal of availability, suitability and viability of land for housing. Need to identify a selection of housing sites across City to promote a balanced and sustainable form of development. Land should be distributed to sustainable locations so that development and investment are appropriately delivered in a balanced and phased way to benefit all parts. Important that consideration is given to ensure proposals will contribute to creation of mixed, balanced and sustainable communities. Thus concerned about proposals to focus residential development in draft Green Belt exclusively to Monks Cross and Metcalfe Lane at East of City, which appears lop-sided. Fails to present a balanced approach to development and could give rise to unsustainable congestion on highway. Areas of search to west and north of City should not be ruled out. Should identify broad areas of search around north east and west of Knapton and Nether Poppleton (Parts of Area E and Area F), to north of Haxby (Area G) and at Strensall, in close proximity to railway. All of these are accessible or can be made accessible to existing public transport corridors (particularly railways) where major infrastructure and service improvements are deliverable and to some extent programmed in relevant policy documents. Accessibility to Area of Search F will be enhanced by improvements to A1237, an increase in provision of bus services as a result of commitment to A59 Park and Ride, and improvements to York Harrogate rail line including introduction of a tram-train service associated with York Northwest development. Site G already benefits from location on York-Scarborough Rail Line. There are planned improvements to Haxby station. Similar position exists for land at Strensall. d) Yes.	2527/7943 2528/7967 2537/7991 2688/8015	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.

Section 3: Spatial Strategy continued

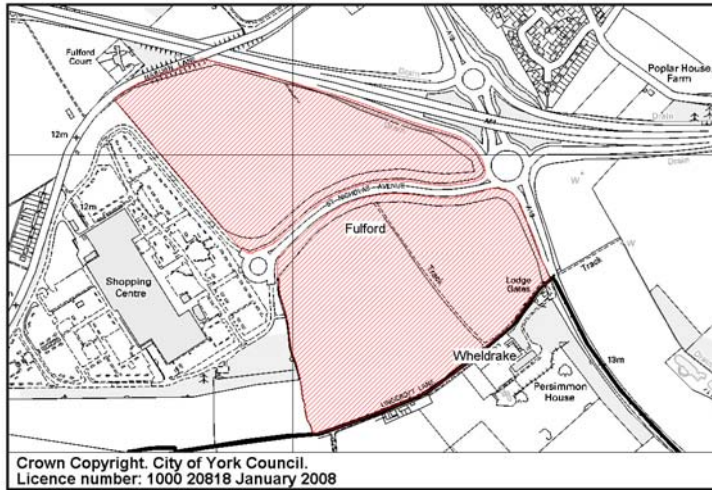
Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	a) Development in draft Green Belt is appropriate to meet housing need. Brownfield sites will not be able to provide enough land to meet this. Will need to come forward from start of plan period to make sure two thirds of supply is houses and to facilitate delivery. Defining a new Green Belt boundary is necessary to replace one designed 50 years ago to respond to different circumstances. Need to release enough land to allow for flexibility to meet existing and future need. Core Strategy has no flexibility in land supply to account for exclusion of windfall sites, lower rates of delivery on key sites and a potential increase in housing allocation and does not identify enough land to be removed from Green Belt through Areas of Search A and B to provide a flexible land supply. c) Area of Search D (South of Moor Lane) should be added as preferred area of search, ahead of Areas of Search A and B, for a residential urban extension. Clear from SHLAA that of all sites identified in potential areas of search it is Area of Search D that is most suitable for residential development at strategic level. With respect to transportation matters, land south of Moor Lane at Woodthorpe (Site D) should be included because it offers significant benefits and opportunities to deliver a highly sustainable development, which at very least, would be of equal merit to either site A (Monks Cross) or site B (Metcalf Lane). By locating and focusing all residential 'urban extension' development within same northeast quadrant of city, in close proximity to each other, would create an unsustainable imbalance to strategic movement of people and goods around and through city. (See representation for detailed site-specific information) d) Area of Search C (North of Hull Road) is suitable as an employment area only.	2542/8056	Moor Lane Consortium
	Definitely appropriate to identify land contained within draft Green Belt for housing. Areas A and B (Monks Cross, Huntington and East of Metcalfe Lane, Osbalwick respectively) would be logical choices of areas to be released from Green Belt to help meet housing requirements. However, land at Tadcaster Road would be a more suitable choice because both sites A and B are located to north east of city, and further from city centre. Site is located to south, just off A1036, which is a main highway, providing good access links to wider area, making site extremely sustainable. (See Representation for detailed site-specific information).	2576/8097	The Wilberforce Trust
	a) Given historical development pattern of city and its encirclement by draft Green Belt, land for future development should be excluded from Green Belt at this stage in order to meet City's long-term development needs. c) Area of Search 'B' would be a suitable location for new residential development.	2685/8109	Mr F R Pulleyn

Section 3: Spatial Strategy continued

Paragraph etc	Comments	Ref.	Name
Question 3 continued			
	a) Yes. b) Principles are "fit for purpose". However, no account taken of "safeguarded land" within city, which could be utilised to accommodate housing and/or employment uses. c) Area B is considered to be most suitable opportunity for future development. It has a number of benefits: - Site A would have a significantly negative highways impact on northern ring road; Site B offers potentially superior public transport links than Site A; Site B offers scope for a well-integrated mixed-use urban expansion scheme with Site C; Site B also relates well to proposed major development and regeneration areas at Derwenthorpe and Layerthorpe; Site B offers potential to improve green network, particularly a new green wedge. d) Area C is preferred (see above). Currently "safeguarded land" adjacent to Grimston Bar park & ride also offers a good, non Green Belt opportunity for employment related uses.	2687/8118	Tangent Properties
	a) Yes. Stress that Green Belt is only draft. b) Principles are appropriate but suggest word change. (See comment on SP2 ref 2689/8143). c) Area A is an appropriate location for new housing with a mixed use element in southern area in line with current draft Local Plan employment land allocation. d) Yes, subject to comments on Monks Cross North see paragraph 3.19 (Ref 2689/8145).	2689/8146	Monks Cross North Consortium
	a) Essential to confirm that development within interim Green Belt will be necessary to meet future development needs. Core Strategy should not however identify specific sites in Green Belt for housing and employment. Core Strategy should establish principles to be applied within Allocations DPD to identify and allocate suitable sites to meet policy objectives. c) Areas may be suitable for development of new homes but Core Strategy should not be site specific. Allocation of land should be left for Allocations DPD. May be other equally or more suitable locations, such as land to north of Clifton Moor, but Core Strategy should only establish principles and then leave Allocations DPD to assess relative merits of sites to deliver future development in line with principles set out in Core Strategy. d) See response to Question c) above.	2698/8229	Commercial Estates Group and Hallam Land Management
	Site E, Land west of Chapelfields, should be viewed as an important source of future housing land and regarded as an additional "Preferred Urban Extension". As such, it should be removed from Draft York Green Belt. (See representation for detailed site-specific information).	2699/8292	Atkinson & Sykes

Site Adjacent to the West of A19 and South of A64 (Including Local Plan Reserved Land)

Dobbies Garden Centres PLC: ref 2507, Land and Development Practice: ref 568/476

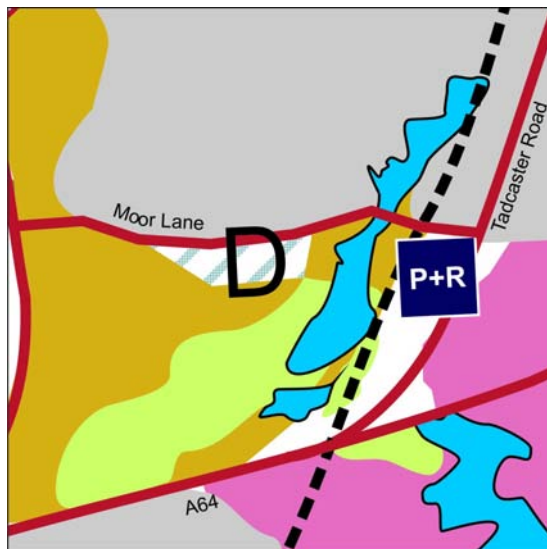


Proposed Use

Employment

Area of Search D, South of Moor Lane

Moor Lane Consortium: ref 2542, Persimmon Homes: ref 161

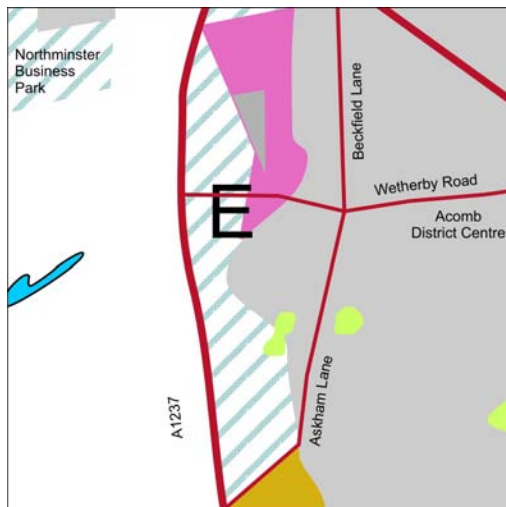


Proposed Use

Mixed use / Employment / Residential

Area of Search E, Land West of Chapelfields (or parts of)

Atkinson & Sykes: ref 2699, Persimmon Homes: ref 161, questionnaire respondents

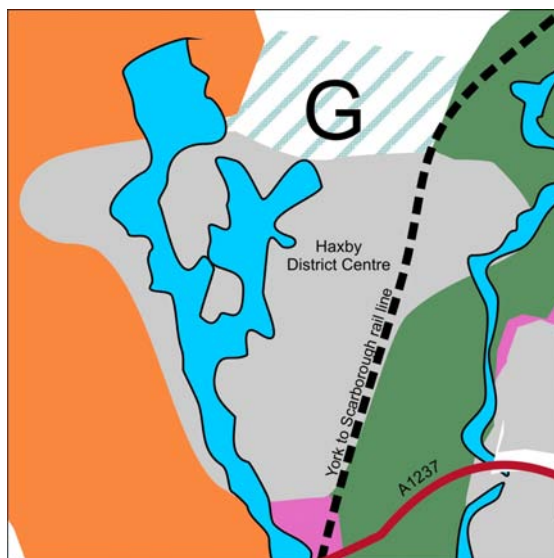


Proposed Use

Mixed Use / Residential / Employment

Area of Search G, North of Haxby (or parts of)

Carter Jonas: Ref: 2527, 2528, 2537, 2688, Persimmon Homes: Ref 161

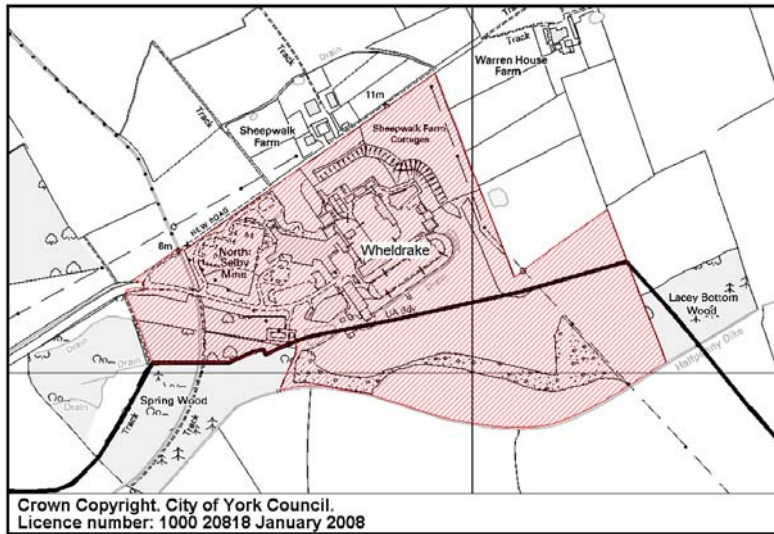


Proposed Use

Residential

North Selby Mine

UK Coal Mining Ltd: ref 515

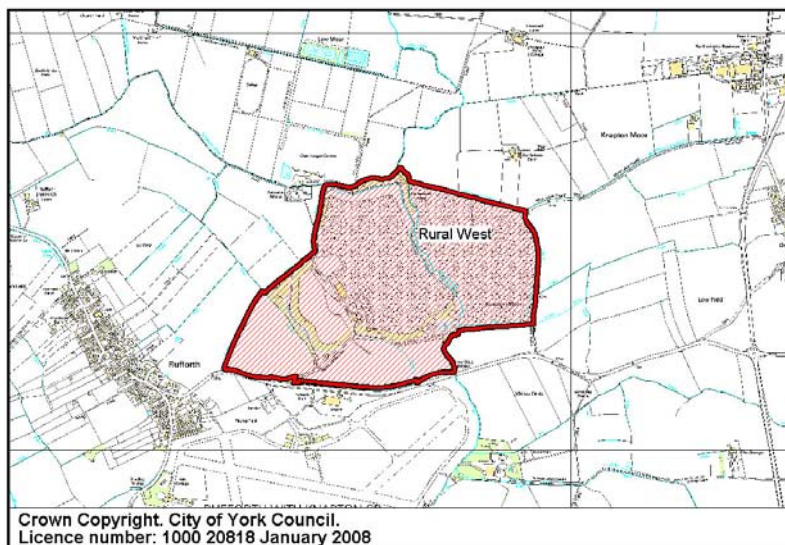


Proposed Use

Renewables with associated Science City York related employment use

Harewood Whin Waste Site, Rufforth

Yorwaste: ref 608



Proposed Use

Waste disposal

Other Areas

A number of respondents referred to other areas which they thought should be considered as alternative areas of search. However, they did not provide maps or clearly cross refer to plans previously submitted for the Allocations DPD. These areas are set out in the table below.

Area / Description	Proposed Use	Respondent
Land to the north of Clifton Moor	Residential	Commercial Estates Group and Hallam Land Management (2698)
Area of Search A should be extended to include land up to the A1036	Residential	Land and Development Practice (568)
Land west of A19, Fulford	Residential	Land and Development Practice (568)
Land to the north east and west of Nether Poppleton	Residential	Carter Jonas (2527, 2528, 2537, 2688)
Land to the north east and west of Knapton (part of Area of Search E)	Residential	Carter Jonas (2527, 2528, 2537, 2688)
Part of Area of Search F	Residential	Carter Jonas (2527, 2528, 2537, 2688)
Urban extension to the north of Haxby	Residential	Barratt Homes (2526)
Some land to the West of the City	Residential	Miller Homes (546)

Smaller Sites

A number of other smaller sites (less than 10ha) were also referred to in the responses, these are not considered to relate to strategic growth and will be considered through detailed work on the Allocations DPD. These are listed in the table below.

Site/Area	Size	Proposed Use	Respondent
Land around Designer Outlet	Not specified	Major Developed site in the Green Belt – reassess boundaries	Dobbies (2507)
Land adjacent to A1079, Grimston Bar	4.86ha	Mixed Use	Lands Improvement (2517)
Local Plan Reserved Land adjacent to Grimston Bar Park and Ride	10ha	Employment	Tangent Properties (2687)

Draft Consultation Statement & Schedule of Responses (2010)

Wilberforce Home, Tadcaster Road	8.9ha	Residential	The Wilberforce Trust (2576)
Foss Bank Farm, Earswick	3.21ha	Residential	Strutt & Parker (2624) and Mrs Barker (605)
Land at Strensall	3.8ha	Residential	Carter Jonas (2527, 2528, 2537, 2688)
Land south of Ferguson Way, Huntington	0.91ha	Residential	Barratt Homes (2524)
Askham Bryan College	Not specified	Major Developed site in the Green Belt - reassess boundaries	Askham Bryan College (276)
London Bridge	Not specified	Sports and Open Space Facilities	York College (282)
Land adjacent to York College	Not specified	Educational uses	York College (282)
Ponds Field, Field Lane, Heslington	5.7ha	Residential	Persimmon Homes (161)
Westfield, Wigginton	7.7ha	Residential	Persimmon Homes (161)
Common Lane, Heslington	5.1ha	Residential	Persimmon Homes (161)

Section 4: The Role of York's Green Belt

Paragraph etc	Comments	Ref.	Name
General			
	20-year period of designation is too short. If no statutory requirement that a time limit be imposed before review, suggest no time scale be indicated. On assumption that Green Belt is to extend some six miles radius from centre of York, suggest outer boundary on north side in particular could be indicated, even though it comes within responsibility of an adjoining authority. LDF must be compatible with those of adjoining authorities.	52/8327	York Environmental Forum
	This is a key issue that LDF needs to resolve. Definition is key issue and all other items flow from this. Should explain that land is not being removed from Green Belt, but that detailed inner and outer boundaries are being defined for first time in a statutory development plan. Should also explain how safeguarding land for development by, not including it within Green Belt, actually results in more defensible and robust Green Belt boundaries in long term.	57/7215	York Property Forum
	Approach to application of Green Belt policy is misconceived. RSS established general extent sets out key purpose of Green Belt. Task for LDF is to define inner Green Belt boundary and such parts of outer boundary as are within District. Inappropriate to seek to redefine or extend higher order RSS policy as to purpose of Green Belt, by seeking to add concept of coalescence with other settlements and villages. Would not be compliant with RSS.	606/7758 610/7779	Jennifer Hubbard Mr G E Wright
Introduction			
Paragraph 4.1	Line 4 amend to 'that preserves and enhances its special...'	110/8297	York Civic Trust
	Need to recognise essential role revising Green Belt boundary will play in enabling York to grow to meet its identified needs. Should be amended to "The LDF Core Strategy vision included in Section 2 of this document envisages that the LDF will create a permanent Green Belt for York that preserves its special character and setting, whilst ensuring sustainable development that meets the growth needs of York, can be achieved. "	2542/8057	Moor Lane Consortium
Context - Policy Context			
Paragraph 4.4	Draft Green Belt leaves too much 'white land' between main built up area and inner boundary. The sites affected should each be analysed as to their green belt functions before they are excluded from the draft Green Belt.	70/8199	Fulford Parish Council
	Add an additional sentence along following lines: - "The primary purpose of the York Green Belt is to safeguard the character of the historic city, which might be endangered by unrestricted expansion. This has been reaffirmed throughout the years by Ministerial statements and by numerous Inspectors' decisions on Appeal" .	242/7423	English Heritage
	Support boundaries being set to endure beyond RSS period to at least 2030. Any revision must take into account a potential increase in housing allocation from 2026 - 2030 in IRS, thus removing more Greenfield land from Green Belt.	2542/8058	Moor Lane Consortium

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Context - Local Context			
Paragraph 4.5 - 4.6	Figure 6 is based on plan attached to City of York Local Plan. Do not consider Approach to Green Belt Appraisal 2003 an appropriate base document for LDF although fully endorse principles set out within it. Strongly agree that areas mentioned need protecting. However, consider that other areas, equally worthy of inclusion have been omitted and no evidence that these have been assessed at all. Green Belt Appraisal 2003 not fully comprehensive and up to date in application of approach taken. Seems to be heavily based on an even more out-of-date document, the ECUS Landscape Appraisal of 1996. Conservation Area designations since then have not been taken into account in applying category 3 to green belt settings of numerous villages including Fulford. Green Belt Appraisal does not cover all areas considered to qualify as "green belt character areas" within Fulford.	70/8200	Fulford Parish Council
Paragraph 4.6	Given 'Character Areas' approach to Green Belt proposed in Figure 6, concerned about role of Green Belt Appraisal 2003 as a key part of Evidence Base. Apart from being a number of years out of date, do not believe is sufficiently robust or comprehensive to play this crucial role in evidence base. Would like to see it reviewed before this part of Core Strategy goes forward. While protection of character is important, Green Belt designation should not preclude sensitively located small-scale renewable energy installations, any more than it currently precludes roads and utility supply equipment. Suitably screened mobile phone masts should also be acceptable in Green Belt close to communities they serve. Not happy with Character Area based approach to Green Belt. Whole purpose of Green Belt is to act as a 'belt' around city and protect all areas within it. Areas not specifically identified, as character areas, may be vulnerable to development. If character areas are identified it must be made clear that does not strengthen case for development within other parts of Green Belt.	458/7565	York Green Party
Paragraph 4.7	Category 2: Agree views to Minster are important. Advocate study is carried out to assess these. Where views are relatively rare or can be seen from public footpaths, should receive extra protection above areas where views are relatively commonplace. Especially welcome such an assessment of Fulford, as there are currently views from Minster Way to south of Germany Beck site that could be lost. Views to Minster could be safeguarded in reserved matters by conditioning heights of buildings on parts of the site if views have actually been assessed as important in emerging LDF. Advocate that views along approaches into city are assessed further to protect areas that form a visually conspicuous part of historic character of York. E.g. views from A19 when entering Fulford. This is main gateway into City from south. Immediately north of A64 wide views are possible across open fields and the Ings to Terry's. The road then bends to cross Germany Beck over Stone Bridge to give views of Edwardian Cottages at entrance to village. This landscape deserves highest protection for future.	70/8201	Fulford Parish Council

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Context - Local Context continued			
Paragraph 4.7 continued	Category 3: To preserve setting and character of York extra protection should be accorded to areas of Green Belt that border onto a designated Conservation Area. A comprehensive up to date assessment of areas where this applies has not been carried out and only areas on west of York have been included.	70/8201 continued	Fulford Parish Council continued
	Line 1 delete 'provide an impression' and substitute 'express the qualities'.	110/8298	York Civic Trust
	Acknowledges identification of Categories 1, 2 and 3. Believe additional wording should be included that provides flexibility to assess future development sites on their own merits. These should be assessed on a site-by-site basis to identify specific role that a site would have on City's historic character, nature conservation and green corridors. Identified Green Belt & Landscape character areas cover large areas of City and consequently include smaller areas of land, which, if developed appropriately, would not have an adverse impact on purpose of these designations. City Landscape Assessment was published in 1996 and Green Belt Appraisal was published in 2003. Guidance needs to be considered in context of City's current and future development needs up to 2030, not what they were in 1996 or 2003.	161/7240	Persimmon Homes (Yorkshire)
	Supports identification of Categories 1, 2 and 3 which would preserve city's historic character and setting.	2517/7893	Lands Improvement
The Preferred Approach			
Paragraph 4.9	Do not agree with contention in second half of paragraph regarding relationship between permanence of Green Belt and need to make sure it is defined such that there is enough land to meet maximum development needs outside it. Common sense approach would be to define what extent of Green Belt should be according to PPG2 criteria and when sites available outside Green Belt have been built on then there are no more sites left. At moment seem to be proposing to set a 'limit', which is no limit because will set it where don't expect to exceed it.	458/7566	York Green Party
	Paragraph is supported.	2685/8110	Mr F R Pulleyn
	Phrase land "outside the Green Belt" requires further definition as to its exact meaning. For example does it mean identification of safeguarded land or something else?	2696/8183	Thomlinsons Solicitors of Wetherby
Strategic Objectives	Plan period should be 15 years from adoption i.e. 2026 and setting Green Belt boundaries based on meeting development needs for an additional four years up to 2030 may not be enough. Provides little flexibility. Noted that paragraph 8.13 appears to indicate some flexibility in the amount of development that could be accommodated in the proposed urban extensions; may mean that Green Belt end date could be pushed back without needing to identify additional safeguarded land.	1/7089	Government Office

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach			
Strategic Objectives	Should undertake immediately review of <u>draft</u> Green Belt boundaries to consider most sustainable locations for peripheral growth. Need for this is urgent given: - shortfall of identified sites for housing; need to build more houses as opposed to flats; and to avoid having to rely upon a substantial proportion of windfall sites which would be contrary to Government policy. In view of shortfall in identified sites, likely that sites within <u>draft</u> Green Belt will need to be released within plan period (up to 2026) to meet development needs. Disagree with Strategic Objective stating that a permanent Green Belt will need to be set which cannot be reviewed for 20 years if this is meant to imply that draft Green Belt will be adopted and then cannot be revised during plan period. Council has identified a small number of large greenfield sites for release from Green Belt. In addition, there are a number of locations where minor boundary amendments could allow development to contribute to city's various housing needs without compromising Green Belt objectives. Review needs to be carried out urgently given lengthy planning timescales involved in identifying and adopting such sites, bringing these forward for development and coordinating with infrastructure delivery. To relegate this activity until after allocated sites, within city boundary, have been built out would be too late.	165/7269	Home Builders Federation
	Plan Period and presumably therefore Green Belt should be up to 2026.	458/7567	York Green Party
Policy CS1	Should be more positive. Green Belt also has a role in enhancing historic character and setting. Should add bullet point identifying areas for development, which do not conflict with primary purposes of Green Belt. PPG2 states that establishment of permanent Green Belt boundaries may mean safeguarding land between urban area and Green Belt, which may be required to meet longer-term development needs. This would be in form of broad locations for anticipated development beyond plan period. Needs to be clear there is sufficient land for plan period up to 2026 and to meet longer-term needs for housing, employment and other uses to ensure Green Belt boundary is sufficiently permanent.	1/7090	Government Office
	Fair expression of aspirations for Green Belt around York. Succinct and appropriate.	77/7223	Murton Parish Council
	3 rd bullet point line 1 - Delete 'provide an impression' and substitute 'express the qualities'.	110/8299	York Civic Trust
	Section (iii) refers to future setting of Green Belt boundaries. These should be set within Core Strategy as this is a 'strategic' planning consideration. Key Diagram should therefore exclude a large majority of land required to meet development needs up until 2030, including sufficient land for residential development. Current Preferred Key Diagram does not exclude sufficient land from Green Belt to enable Council to meet future development needs.	161/7241	Persimmon Homes (Yorkshire)

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS1 continued	(i) Green wedges are non-statutory. Should not be given same weight as Green Belt. (iii) Unclear what is being proposed. RSS requires York to set its Green Belt boundaries to be able to meet its development needs up to 2026. Not written to allow York to project its development 'outside' Green Belt boundary. Understand (although not made clear) that outer boundary of draft Green Belt resides in adjacent local authority districts. Could be read as an attempt to renege on housing commitment and redistribute target among adjacent authorities. Acknowledge that some housing could be allocated in surrounding villages within Green Belt boundary, but even this option will be constrained since supply will be limited to a smaller number of brownfield sites in those settlements. Ability to deliver in these villages will be limited further by application of SP1, SP2 and SP3. RSS says that boundaries must be set to take account of need to accommodate development targets in current plan period (up to 2026) as well as accommodating development needs beyond this period (up to at least 2030).	165/7270	Home Builders Federation
	Makes no mention of existing 'major developed sites in Green Belt', which includes College site. To maintain status as a leading land-based college, important that land is provided within Green Belt to allow for expansion. This should be acknowledged.	276/7441	Askham Bryan College
	iii) Do not support.	458/7568	York Green Party
	Policy statement is an excellent précis of role that Green Belt should play. However, proposal C on Key Diagram runs directly counter to policy. If Derwenthorpe and proposal B come to fruition, and supply apparent need for housing, pressures on infrastructures of surrounding villages (Stockton, Holtby and Murton) are inevitable. It erodes further green wedge into York from East and rural character surrounding Murton.	2470/7857	Ms I Waddington
	Support and note that Green Belt boundaries must endure until at least 2030, to ensure that development needs of York can be met in this period.	2517/7894	Lands Improvement
	Needs to state what areas of search are for removal from draft Green Belt to accommodate urban extensions. 4 th point should be added to policy stating " Review of the Green Belt boundary, to enable sustainable urban extensions to York, will be focused on Areas of Search A, B and D. " Area of Search D (South of Moor Lane, Woodthorpe) should be preferred choice ahead of Areas of Search A and B on grounds of suitability scores in SHLAA and needs to be included to allow for sufficient flexibility with land supply for housing. Core Strategy does not identify enough land to be removed from Green Belt through Areas of Search A and B to provide this flexibility. Additionally through SHLAA representations clear that sites promoted by land owners falling within Areas of Search A and B do not total 210 ha as alluded to within Preferred Options. Deliverability must therefore be questioned.	2542/8059	Moor Lane Consortium

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4			
	a) No - should be addressed under the historic theme with stronger linkage to green infrastructure. b) Yes - Primary Green Belt purpose in paragraph 1.5 of PPG2 'to preserve the setting and special character of historic towns' is most important in York's case. c) Need to be able to justify this at examination, in the context of PPG2 and the special circumstances of York. The Green Belt should be shown to be permanent and last beyond the end of the plan period, otherwise the Core Strategy could be found unsound.	1/7091	Government Office
	c) We would have expected the green belt section to address the role of safeguarded land beyond 2030 as the Core strategy needs to look ahead more than 20 years from adoption to define an enduring green belt.	2/	Local Government Yorkshire & the Humber
	While preserving setting and special character of York is vitally important, also important that Green Belt continues to safeguard countryside from encroachment, particularly as much of it around York is of high agricultural grade 1 and 2 land and aesthetic quality. Also landscape character and cultural heritage are key contributors to regional and local identity, influencing sense of place, shaping the settings of people's lives and providing a critical stimulus to their engagement with the natural environment, and should also be regarded as important. Critical that plans are made for a secure environmental future, where changing landscapes are managed sustainably, and highly valued, distinctive expressions of local identity. Agree proposed lifespan of 20 years is appropriate.	4/7124	Natural England
	a) Yes. b) York's Green Belt can provide support for biodiversity in the York area for example by providing feeding areas for farmland birds. Opportunities could be taken to support farmers and land owners in enhancing their land to increase biodiversity and habitat connectivity. Would also be popular with both residents and tourists who may for example use cycle paths, which cut through Green Belt around York. Acts as a buffer around areas that are nationally important for their high biodiversity value such as Askham Bog and Strensall Common. c) Lifespan appears appropriate. However 20 years is a very short time in relation to the development of native woodland, which would need protection from development for a far longer period to become a valuable resource.	49/7185	Yorkshire Wildlife Trust
	a) Set out fairly well. Practical application is less rigorous especially Green Belt Appraisal 2003. b) Yes, but other purposes should also be accorded sufficient weight.	70/8202	Fulford Parish Council

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	a) Yes. b) Not possible to give order of importance for the three parts which comprise Policy CS1. They are interwoven to give coherent whole to the policy. c) Green Belt lifespan should be 30 years. Concerned at proposal for development at Area C. Appears to negate all that has been written for Policy CS1. Although not of prime agricultural worth, still of use for farming and keeping land for food production. Drainage problems well known locally. Development will put further strain on infrastructure in area particularly road system. It is part of an important break between urban and village in York. Defence of rural York is one of Council's priorities. Area provides an important element for Village of Murton.	77/7224	Murton Parish Council
	The lifespan should be 'a minimum of 20 years'.	110/8300	York Civic Trust
	a) Believes adequately addresses issue. b) Believes primary purpose of Green Belts is adequately set out in PPG2. Does not believe York's Green Belt should be equated any particular focus on protecting its historic character. More detailed emerging LDF documents should seek to include policies on protecting character of York. Do not believe this policy approach should be included within Green Belt policy in Core Strategy. c) Considers a lifespan of 20 years appropriate provided sufficient level of land is released and/or safeguarded to ensure future flexibility of LDF. However, looking at PPG2 paragraph 2.9 there is a need to ensure that life of Green Belt endures, and boundaries are permanent. Key Diagram currently identifies a boundary that is drawn too excessively tight around existing main urban area and Local Service Centres and would not exclude a sufficient and flexible supply of land to meet current and future development needs up to 2030.	161/7239	Persimmon Homes (Yorkshire)
	Importance of York's historic character and setting is adequately reflected and that Green Belt is an important tool to ensure that growth is managed in a way that safeguards this. Supports strategic objective to set a permanent Green Belt that will not need to be reviewed for at least 20 years. Notwithstanding this, critical that when setting long term Green Belt boundaries, consideration is given to need to accommodate development requirements until at least 2030. Also essential that there is sufficient land outside of proposed boundaries to accommodate any increase in housing and other development requirements that may arise from a review of RSS. Setting of boundaries must be informed by a robust evidence base. As such, inappropriate and unsound to define boundaries in advance of completion of SHLAA, which has been subject to proper consultation.	164/7257	Hogg Builders (York) Ltd

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	a) Yes. b) No. Purpose is to ensure there is a boundary around York. It does not mean that no development should take place in Green Belt. What should be allowed is appropriate development in Green Belt. c) Lifespan of 20 years is too long and will need to be reviewed beforehand as city expands.	198/7282	The Helmsley Group
	Two main purposes are very important to prevent coalescence and to retain setting of York. Coalescence: - Possible developments/proposals around the Poppletons would in effect extend built up area of city, with only a gesture towards retaining a Green Belt dividing line – narrow area between outer ring road and Nether Poppleton. Existing Green Belt areas, including previous Civil Service land to left and all land on opposite side of A59, to right, should be retained as such. Civil Service land in particular would be a great asset for Northwest Area development, as open space, recreation land. Setting of York: - Possible developments in pipeline would create a suburbanised area, reaching out beyond the Poppletons. Would also break principle to keep development within outer ring road. Designated area for employment adjacent to Northminster should be abandoned. Would, moreover, put renewed pressure on A59 and outer ring road, which Park & Ride is attempting to address. (Preference is still for Park & Ride site to be on far side of Northminster – less intrusive, more beneficial, retaining green approach to York.) Green wedges are a key contribution to setting of York. These have focused on rivers and strays. Main arterial roads, such as A59, should also be recognised as contributing to setting – green fingers running into city. These roads, including outer ring road, should be kept free of development alongside, well away from edge, so that visitors continue to have green corridors as they circle or penetrate city. This is another argument for current Green Belt on either side of A59 as far as old Manor School, being retained.	203/7296	Ms J Hopton
	Question whether appropriate to designate all proposed extensions to existing green wedges as Green Belt. Regard must be had to objectives and key purposes of Green Belt set out in PPG2 in each instance, having regard to site-specific circumstances rather than adopting a “blanket” approach. Note potential issue of Green Belt release will to a large extent be dependent upon delivery of York Central. The more certainty that can be given within emerging policy framework to guaranteeing delivery of York Central, the less the impact will be upon York's Green Belt.	214/7311 621/7357	Network Rail National Museum of Science & Industry
	a) Agree with statement. b) Agree with statement. c) Agree with statement 20 years is realistic.	218/7398	Northern Gas Networks

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	To define a Green Belt, fulfilling its primary purpose, there are a number of questions, which need to be answered: - What are elements of City, which contribute to its "special character" and "setting"? What is current state of those elements and is there a point at which they might be harmed by future development? What role does Green Belt play in protecting those aspects of City's character? Based on these, where do Green Belt boundaries need to be defined in order that those elements of special character and setting are preserved? Evidence Base has yet to clearly articulate what Council considers to be elements, which contribute to York's "special character" and "setting". Without this, difficult to ascertain whether or not extent of Green Belt shown on Figure 2.3 will actually fulfil its primary purpose. Whilst not disagreeing with areas set out in Policy CS1 as being aspects of York's character which Green Belt ought to safeguard (or inclusion within Green Belt of areas which have been identified, spatially, on Figure 2.3), would appear to be a number of other questions that need to be answered to define Green Belt that will fulfil its primary purpose: - Is size of and main built-up area of York a key element of its special character. If so how big should York grow (and in what direction) before that aspect of its character is eroded? Why would peripheral development on north-eastern and eastern side of York be acceptable given that Policy CS1 considers that <i>"areas ... which provide an impression of a historic city situated within a rural setting"</i> should continue to remain open in order to safeguard special character of York? Where are most important views of York? Is Green Belt most appropriate Policy tool for safeguarding them? Are sizes of settlements surrounding main built-up area of York part of special character and setting of York? If so, how much growth could they accommodate? a) Provides good summary of importance of York's' historic character and setting and role which the Green Belt helps to play in safeguarding this aspect of City. Fully endorse statement in Paragraph 4.6. Another aspect of York's special historic character and setting which Green Belt should be seeking to preserve are those areas, which regulate size and shape of city and, thus, help to safeguard City from adverse effects, which might arise from unregulated growth. b) Whilst York Green Belt performs a number of other functions listed in PPG2, these are secondary to primary purpose of safeguarding special character and setting of historic City. c) If timescale of upper tier of development plan is to 2026, follows that life of Green Belt should be longer. However, given that "permanence" being suggested is only four years longer than end date of RSS, seems somewhat less "permanent" than envisaged in national guidance. However, worth noting that Green Belt Local Plan Inspector considered that: - <i>"... mathematical precision is not really relevant in a context where change should only occur as a result of wholly unforeseeable changes of circumstance"</i>.	242/7422	English Heritage

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	c) Important when setting Green Belt boundaries that a degree of flexibility is built into plan to reflect future development needs. Core Strategy reflects guidance set out in current RSS, which is being reviewed. Housing growth and capacity figures are being updated and will feed into IRS. Setting long-term boundaries in advance of future requirements could result in these being drawn too tightly around City and surrounding villages and not allow for flexibility. This could adversely affect character of city and result in 'town cramming'. Council should reassess boundaries and policy basis of 'Major Development Sites in Green Belt'. Sites such as Askham Bryan College Campus should be considered favourably to provide opportunities for future expansion. Not suggested that Green Belt should be focus of large-scale urbanisation, but Council should take a pragmatic approach to supporting continued success of higher education and allowing diversification and expansion, recognising economic benefits it brings to area.	276/7440	Askham Bryan College
	Certainty about extent of Green Belt should be provided. In timescale terms lifespan of Green Belt boundary should align with RSS, which provides policy to 2026. A 20-year boundary is not appropriate and unduly restrictive and unresponsive to future long-term change. Concerned that too much emphasis has been given to just one of purposes of Green Belt. Fundamental aim is to prevent urban sprawl. Preserving special character of historic towns is one of a number of purposes. Too much emphasis on preserving historic character of York. Question analysis that has taken place in 2003 Green Belt Appraisal. This was prepared a long time in advance of other information used to inform LDF and five years prior to adoption of RSS. Evidence bases should align. For site-specific information relating to area around Sim Balk Lane College site and London Bridge site see details in representation.	282/7446	York College
	a) & b) General principles for requirement for boundaries to be established is sound as is need to retain certain strategic green spaces within Green Belt review. Section does highlight conclusions and recommendations made within Green Belt appraisal, which established an approach, addressing matter of York's historic character and setting. Approach at this stage needs to emphasise more clearly linkages between housing and development requirements and how this will need to be taken into account in defining inner boundaries. Whilst not in dispute as to purpose of identification of land within Green Belt, in terms of protecting openness, urban sprawl, coalescence etc., approach to determining extent of Green Belt will be heavily influenced by evidence base which will determine whether any of land currently identified in Green Belt needs to be removed and allocated for housing or other development. c) Consider proposed time of 20 years would be appropriate.	331/7474	Taylor Wimpey (UK) Ltd

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	a) Yes. However, if suggested approach were to result in infill development between character areas, would be extremely detrimental to character and setting of York. Views of Minster perceived from a green corridor with developments on either side wouldn't really be appealing or fulfil proper function of Green Belt. b) Preserving historic character & setting should be an important purpose. Other purposes which should be added to CS1 are: - To prevent urban sprawl, specifically to prevent further infill development up to inner ring road. Area of open green setting should be retained where possible between Main Urban Area and ring road; To help protect countryside around York for agricultural, recreational, conservation and amenity use; To help define limits to growth of city in relation to its eco-footprint, carbon footprint and an Environmental Capacity Study. c) No. 15 years would be appropriate.	458/7569	York Green Party
	Should identify more clearly how extent of Green Belt will be defined. Will need to outline how suggested approach will: - prevent urban sprawl; protect a sense of openness; and secure and protect special setting and character of York. Approach of setting boundaries of Green Belt for a minimum of 20 years is appropriate.	479/7733	Yorkshire Forward
	a) Agrees. b) Agrees. In addition agrees that areas of land identified are most important areas of land in preserving the city's historic character. However, a more flexible approach to development on Green Belt land outside of these identified areas should be adopted. This would include sites, which do not contribute to preservation of city's historic character. c) Considers Green Belt lifespan should reflect lifespan of RSS and not go beyond it, on basis that development needs beyond lifespan of RSS are currently unknown and may be a need to release Green Belt land in future to meet York's future development needs.	515/7496	UK Coal Mining Ltd
	a) and b) Yes. Views of Minster, which can be seen from many vantage points and on a number of approaches to City, not sufficiently emphasised. Needs to be of primary concern in defining appropriate Green Belt boundaries. In defining inner boundary, need to maintain consistency with Inspectors findings on plans such as York Green Belt Subject Plan and Southern Ryedale Local Plan. c) Yes.	546/7700	Miller Homes Ltd

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	To protect historic character and setting of York, Green Belt land has to be released at appropriate locations around current development boundaries. Must also recognise issues of over capacity in city centre. Extent and location of released Green Belt land should relieve and not exacerbate historic centre capacity problems. a) Limited release not sufficient to relieve York's historic character and setting capacity issues. b) Yes. c) Given constraining influence of draft Green Belt not having been reviewed nor confirmed for more than 30 years and predicted growth, proposed lifespan for 20 years has to be demonstrably adequate in its release at this stage to protect historic core of city.	568/7711	The Land and Development Practice
	No objection to either role of Green Belt or identified 20-year life. However, the special nature of activities undertaken at Harewood Whin site merit further consideration and, in line with PPS10, limited realignment of Green Belt to specifically exclude this site.	608/8286	Yorwaste Ltd
	a) Yes. b) Three parts of policy (i), (ii) and (iii) hang together and cannot be prioritised. c) Should be longer - 30 years.	2470/7858	Ms I Waddington
	b) Adequately set out in PPG2 and should be equated any particular focus on protecting historic character. Emerging LDF will include policies on protecting character of York, and as such do not believe this should be primary purpose of Green Belt. c) 20 years is appropriate. However, to ensure life of Green Belt endures, and boundaries are permanent, should undertake immediately a review of draft Green Belt boundaries to consider most sustainable locations for peripheral growth. This is required given the: - shortfall of identified sites for housing; need to build more houses as opposed to flats; and to avoid having to rely upon a substantial proportion of windfall sites which would be contrary to Government policy. In view of shortfall in identified sites, likely that sites within draft Green belt will need to be released within plan period (up to 2026) to meet development needs. Believe that A64 is a clearly defined boundary, which would provide permanent boundary for city, and ensure a sufficient and flexible supply of land to be brought forward for development. Exclusion of land from Green Belt would not conflict with five purposes of including land in Green Belt in PPG2.	2517/7896	Lands Improvement
	General role in protecting historic character of City and proposed life span of 20 years is appropriate. To ensure boundaries endure for period identified, they must be drawn to exclude an adequate amount of land to meet development needs for that period. Includes allocating land for development and identifying safeguarded land to meet unanticipated needs.	2523/7916	Grantside Ltd

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	In broad terms, importance of York's historic character and setting is adequately reflected. Supports strategic objective to set a permanent Green Belt that will not need to be reviewed for at least 20 years. However, is critical to consider need to accommodate development requirements until at least 2030. Also essential there is sufficient land outside of proposed Green Belt boundaries to accommodate any increase in housing and other development requirements that may arise from a review of RSS. Setting of boundaries must be informed by a robust evidence base. Therefore it is inappropriate and unsound to define boundaries in advance of completion of SHLAA, which has been subject to proper consultation.	2524/7928	Barratt Homes (York) Ltd
	Main function should be to protect historic setting of City Centre, York Minster and historic approaches to it. Land that does not fulfil these specific functions should be excluded from Green Belt. Represents an opportunity to guide development to sustainable locations where will not impact on historic views of York Minster. Important that Council sees Green Belt as a policy tool, not an end in itself. Boundaries should be set with a substantial degree of permanence in mind and should be more ambitious and set Boundary for a minimum 30-year period. If defined boundaries are robust this will reduce pressure for future Green Belt Reviews. In setting boundaries, not clear that Core Strategy reflects advice in PPG2 or RSS re need to provide safeguarded land.	2527/7944 2528/7968 2537/7992 2688/8016	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	b) Historic character and setting of York should not be primary purpose of Green Belt. Openness of land around York should be recognised as its primary purpose. c) Support.	2542/8060	Moor Lane Consortium
	One of primary purposes of Green Belt, especially round a city like York, should be to protect historic character and setting, by preventing development from encroaching on countryside. There are other purposes Green Belt in addition to this one. Lifespan of 20 years is appropriate. A lot can change over 20 years, and boundaries may need to be altered to accommodate development, and provide housing for a larger population, but is important that main core of Green Belt remains constant beyond proposed 20 year lifespan. Note that Policy CS1 sets out objectives of Green Belt around York. Land off Tadcaster Road meets none of criteria, and therefore is difficult to justifiably retain that land as Green Belt. Despite objectives of Green Belt, fail to see how retaining certain parts of land help to meet any of these criteria. In some cases, allowing parcels of land for departure from Green Belt would create a more rounded, logical boundary to it, without any impact on historic character of York, and historic setting. Permitting residential development on part of land at Tadcaster Road, and releasing remainder from Green Belt, historic character and setting would not be affected.	2576/8098	The Wilberforce Trust

Section 4: The Role of York's Green Belt continued

Paragraph etc	Comments	Ref.	Name
Question 4 continued			
	Support approach to finally identifying Green Belt boundary. 2030 deadline should be a minimum. To provide sufficient land, Green Belt boundary needs to contain sufficient land to allow for changes in circumstances. As currently proposed, fear boundary will be too tightly drawn and lack flexibility to cater for future changes.	2689/8147	Monks Cross North Consortium
	To ensure that Green Belt boundaries, once defined, do not have to be altered, safeguarded land should be provided. On similar principles to identification of housing land a range and choice of safeguarded land sites should be identified. Object to absence of such a policy.	2696/8184	Thomlinsons Solicitors of Wetherby
	a) Preferred Option only proposes to plan beyond RSS plan period by a further 3 years. Not considered that this constitutes “endures beyond the RSS period”. A review of Green Belt would be required again before end of 20 years to identify and deliver any growth requirements after the 20 years has expired. Advocate a longer period of say 30 or 40 years is set as objective with a policy to require land to be safeguarded for future development needs and that sufficient land is safeguarded to provide flexibility in future where growth levels have not yet been identified. Would better reflect importance of York's historic character setting and long term objective of its protection through mechanism of identifying and setting Green Belt boundaries in Allocations DPD to provide a greater degree of certainty and permanence. b) Not role of Core Strategy to bestow any relative levels of importance to five purposes of Green Belt. Should not, therefore, make any reference to what may or may not be considered to be primary purpose of Green Belt. c) See response to a) above.	2698/8234	Commercial Estates Group and Hallam Land Management

Section 5: York City Centre

Paragraph etc	Comments	Ref.	Name
General			
	A key part of planning for places and would sit better in 'York's Special and Built Environment' section with linkages to other sections. Should establish and justify the boundary in Policy CS2. CABA suggest stronger hook needed in Core Strategy to AAP with a diagram and mini brief.	1/7092	Government Office
	We welcome the approach to the city centre.	2/	LGYH
	Stonebow area recognised as retail growth area. Should be pursued in conjunction with modified proposals for Castle Piccadilly, although doubt if additional growth can be justified.	52/8328	York Environment Forum
	Commitment to use and quality of public spaces is endorsed. Improving gateway streets is similarly welcome. Proposals for an extension of range of footstreets and hours that footstreets are operational would also be supported.	373/8218	Visit York
	Justification/commentary and policy need greater clarity as to definition of City Centre area. Figure 9 does not provide a comprehensive boundary and boundary shown is not appropriate. Boundaries should include areas outside walls, to at least address policy relating to setting of historic core, as well as to cover parking areas which serve central core and other areas performing a city centre function such as Gillygate. City Centre AAP needs to address parts of area covered by Northwest AAP, as Office Quarter needs to be integrated into policy framework for city centre. Background analysis of retail issues and evening economy need to be addressed in greater detail. Shortfalls of, and encumbrances upon, retail sector need to be articulated and identified as issues to be addressed in AAP and means of accommodating expansion of evening economy within city centre requires identification and quantification as do associated issues. Assessment of underlying causes for weakness and potential failure of retail function needs further consideration. This should include: - Diversion of high valued goods to out-of-town locations; Extent of non-retail ground floor space in prime zone; Beneficial and vital use of vacant/derelict premises; Accessibility by car including for high value goods and ancillary social and cultural needs; Improved town centre management; Key anchors for expanded retail offer. Linkage between AAPs needs to consider process whereby non-retail functions within existing prime retail core can be relocated out of prime retail area. In particular establish a proactive policy towards those premises, formerly occupied by major banking houses, with significant ground floor space in and adjacent to Parliament Street. Need to recognise problems which have arisen in that part of town where focus of night club and late night drinking occurs, as planning permissions have been granted and not been capable of being implemented due to restraints on issue of licences. Economic expansion of York demands ability to expand this element of nighttime economy and Core Strategy needs to provide policy to facilitate and achieve this.	606/7759	Jennifer Hubbard

Section 5: York City Centre

Paragraph etc	Comments	Ref.	Name
General			
	Should be flexibility in use of ground floor premises to enable market to respond to demand. In particular, limitations on proportion of building frontages devoted to non-retail uses should be abandoned.	606/7759 continued	Jennifer Hubbard continued
	Justification/commentary and policy need greater clarity as to definition of City Centre area. Figure 9 does not provide a comprehensive boundary and boundary shown is not appropriate. Boundaries should include areas outside walls, to at least address policy relating to setting of historic core, as well as to cover parking areas which serve central core and other areas performing a city centre function such as Gillygate. City Centre AAP needs to address parts of area covered by Northwest AAP, as Office Quarter needs to be integrated into policy framework for city centre. Background analysis of retail issues and evening economy need to be addressed in greater detail. Shortfalls of, and encumbrances upon, retail sector need to be articulated and identified as issues to be addressed in AAP and means of accommodating expansion of evening economy within city centre requires identification and quantification as do associated issues. Assessment of underlying causes for weakness and potential failure of retail function needs further consideration. This should include: - Diversion of high valued goods to out-of-town locations; Extent of non-retail ground floor space in prime zone. In this respect allied recreational uses should be welcomed but business uses should be redirected to proposed office quarter, which should be re-designated as a business quarter; Beneficial and vital use of vacant/derelict premises; Accessibility by car including for high value goods and ancillary social and cultural needs; Improved town centre management; Key anchors for expanded retail offer. Should be flexibility in use of ground floor premises to enable market to respond to demand. In particular, limitations on proportion of building frontages devoted to non-retail uses should be abandoned. Linkage between AAPs needs to consider process whereby non-retail functions within existing prime retail core can be relocated out of prime retail area. In particular establish a proactive policy towards those premises, formerly occupied by major banking houses, with significant ground floor space in and adjacent to Parliament Street. Need to recognise problems which have arisen in that part of town where focus of night club and late night drinking occurs, as planning permissions have been granted and not been capable of being implemented due to restraints on issue of licences. Economic expansion of York demands ability to expand this element of night-time economy and Core Strategy needs to provide policy to facilitate and achieve this.	610/7780	Mr G E Wright

Section 5: York City Centre continued

Paragraph etc	Comments	Ref.	Name
Introduction			
Paragraph 5.1	Relates to York City Centre as 'the focus' for offices and their development. This is confusing when compared to Section 5.8, which describes York Central as 'the main focus for new office development' in line 1.	110/8301	York Civic Trust
Context - Local Issues			
Paragraph 5.9	Challenge validity of Retail Study as part of evidence base. No justification for growth seeking a 34% share of market and not supported. Central shopping area requires consolidation, not expansion in current climate. Investment and growth should be targeted on Newgate Market and Parliament Street. Castle Piccadilly should not be considered for retail development as it will 'stretch out' central shopping area and threaten overall viability. Stonebow and York Northwest may be appropriate for some retail if housing developments go ahead. Don't support objective to retain position in wider regional retail hierarchy. It is quality and variety of provision that is important to local people not its standing in any 'league table'	458/7570	York Green Party
Paragraph 5.9 and Figure 9	States Retail Study recommends increasing York's retail market share to 34%. This is not case. Clearly stated in Retail Study that "the extent to which the Council should seek to 'claw back' lost spend in its catchment area is a policy choice to be made through the LDF process. The objective could be to enhance the market share of York City Centre to levels experienced in previous years, i.e. 37% in 2001 and 31% in 2004 (now 28%)". It is therefore Council's decision on which level of growth to pursue. Given York's role as a key driver of Leeds City Region considered appropriate to pursue a higher percentage of 37%. In discussing appropriate locations for additional retail floorspace identified within Retail Study, positive reference should be made to York Central. Critical, given importance of establishing linkages between York Central and city centre, that York Central is identified on Figure 9. Furthermore, appropriate to include arrows on diagram illustrating connectivity between York Central and city centre. A further category should be added onto legend of Figure 9, illustrating 'employment growth areas'. These could include part of York Central, and Hungate site.	214/7313 621/7359	Network Rail National Museum of Science & Industry
The Preferred Approach			
Paragraph 5.14	Relates to York City Centre as 'the focus' for offices and their development. This is confusing when compared to Section 5.8, which describes York Central as 'the main focus for new office development' in line 1.	110/8302	York Civic Trust
Paragraph 5.15	Line 4 - amend 'sensitively considers' to 'takes full account of'.	110/8303	York Civic Trust

Section 5: York City Centre continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Paragraph 5.15 continued	Second sentence needs additional text to emphasise importance of linking parts of City that are subject of separate AAPs, but which in reality lie adjacent to each other. Suggest adding the following at end of sentence: - “and the associated development constraints, together with connectivity to other Area Action Plan areas, including York Northwest” .	214/7314 621/7360	Network Rail National Museum of Science & Industry
Policy CS2	Relates to York City Centre as 'the focus' for offices and their development. This is confusing when compared to Section 5.8, which describes York Central as 'the main focus for new office development' in line 1.	110/8304	York Civic Trust
	First bullet point should be amended to recognise role of York Northwest (in particular York Central) by adding at the end “recognising the development constraints of the historic environment within the city centre, and having regard to improved connectivity with York Central, as part of York Northwest” . The fourth bullet point should be broadened to also relate to connectivity to and from city centre to surrounding area, including York Central.	214/7315 621/7361	Network Rail National Museum of Science & Industry
	Given significant historic environment resource within City Centre, surprising that no mention is made of intention to try and utilise/exploit area's historic assets more fully to assist in delivery of other plan objectives. Additional bullet point should be added along following lines: - “Capitalise upon the City Centres internationally important heritage to deliver wider economic and social benefits to the sub-Region” .	242/7424	English Heritage
	City Centre is heart of community and an expression of its culture and identity. As well as shops centre should provide a range of realistic functions for leisure, recreation and cultural activities centred on restaurants, pubs, clubs, theatres, cinemas, libraries and museums. All these elements play an active role in creating and maintaining a vibrant city centre and contributing to a stimulating night-time economy. Should certainly be a policy to enhance and specifically promote existing facilities, which support city centre's role as primary focus for retail, leisure and employment. Should also provide guidance for new facilities and infrastructure and necessary framework for subsequent DPDs and SPDs. Policy could be made more robust and should contain more detail as to scale of development, range and mix of uses, how they relate to each other and infrastructure necessary to achieve this for city centre.	324/7468	The Theatres Trust
	Should be more positive in approach ensuring that centre develops its role as primary focus for retail, leisure, tourism and office development. Should be increased emphasis of linkages between city centre and York Northwest (York Central in particular) and role this site will take in supporting city centre in future.	479/7734	Yorkshire Forward
	Would like to be involved in development of Transport Accessibility Masterplan.	2434/7845	Highways Agency

Section 5: York City Centre continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS2 continued	Should state there is a need to avoid a high-density urban environment that could adversely affect historic environment. Therefore high-density residential development on city centre Brownfield sites may not be appropriate. 5 th bullet point should be added stating, "ensure that a balance is achieved between meeting growth needs through delivering appropriate development that will not result in a dense urban environment that could adversely affect the integrity of the city's historic environment."	2542/8061	Moor Lane Consortium
Question 5			
	Stronger linkages needed within document and to AAP. Should be more emphasis on tourism.	1/7093	Government Office
	Supports approach. High quality greenspace within and close to the city centre can play an important role in enhancing people's experience of the city centre, complementing it's cultural, economic and social offer, as well as providing benefits ranging from flood mitigation to providing opportunities for shading and urban cooling. Can also play an important role in making city centre accessible to those living, or doing business, outside of it. Aim should be to provide an integrated network of easily accessible greenspaces connected by routes that enable visitors to choose healthy and sustainable forms of transport such as walking or cycling.	4/7125	Natural England
	Maintaining and supporting the city centre is vital to prevent pressure for excessive development outside the present footprint of York with resulting increased loss of open space and traffic. The City centre can also be important for wildlife and recent sightings of otters near the Scarborough Bridge show that by improving city centre green spaces for biodiversity York's citizens can remain in contact with nature. Green space can mitigate for the 'urban heat island' effect, which may become increasingly important due to global warming. Green roofs and green walls can provide the benefits of green space when actual open space is limited.	49/7186	Yorkshire Wildlife Trust
	Considers City Centre should continue to be cultural, social and economic heart of York and agrees that there are opportunities to provide new homes within city centre. However, regard must be had to a robust SHLAA, which accurately identifies the potential capacity of city centre sites. Concerns over assumptions made in respect of capacity of city centre sites, as York SHLAA is currently incomplete.	164/7258	Hogg Builders (York) Ltd
	Yes.	198/7283	The Helmsley Group
	Existing and potential linkages/connectivity between city centre and York Northwest (specifically York Central) should be emphasised in this section in context of retail and employment opportunities York Central also offers.	214/7312 621/7358	Network Rail National Museum of Science & Industry
	Agree. Unless use sensible rates for parking on park and ride approach will be compromised.	218/7399	Northern Gas Networks

Section 5: York City Centre continued

Paragraph etc	Comments	Ref.	Name
Question 5 continued			
	Welcome recognition of significance of historic environment and clear articulation, in Policy CS2, that strategy for this part of York will be delivered in a way which safeguards and enhances its assets. Strongly support intention to enhance public realm of central area. AAP should attempt to reduce physical and environmental "impact" of traffic, as a whole, upon city. Should set out framework for reducing both number and types of vehicles using city centre.	242/7425	English Heritage
	No. Proposed retail strategy is wrong and will undermine stated objective.	458/7571	York Green Party
	Should be more emphasis on development of a cultural quarter in centre. Important in fulfilling role for tourism, and not just considered as a shopping destination. Support priority for additional retail floorspace in city being within, or adjacent to, central shopping area of city centre at Castle Piccadilly and Stonebow. Consideration needs to be given as to how retail development could be brought forward at York Northwest should development of Castle Piccadilly site be significantly delayed.	479/7735	Yorkshire Forward
	Should be recognised there are sites outside of city centre which can contribute to wider spatial strategy in terms of employment development.	515/7497	UK Coal Mining Ltd
	City centre should be supported, however must not undermine other locations, which also supply vibrancy and economy needed to retain continuity of York, for example outer city centre locations. City centre is focus of tourism economy and that element should be protected together with its culture and social activities by provision of other economic and residential forms being located outside city centre recognising essential transportation needs.	568/7712	The Land and Development Practice
	Agree city centre should remain as cultural, economic and social heart of York on following basis: - • Further development within city centre is undertaken in accordance with emerging LES. • No further increase in level of exposure in areas of existing poor air quality • Access to city centre by low emission public service vehicles is improved and access by private cars is reduced and better enforced • Measures for reducing number of HGV movements are progressed and made a compulsory requirement of any major new retail schemes, e.g. Castle Piccadilly area. • Further increases in city centre parking provision should be resisted and parking prices set so as to favour Park and Ride and other bus services. • Development of additional city squares and spaces should only be undertaken in areas where air quality is of an acceptable level. • Protection of local air quality and delivery of a LES should be key aims of CCAAP. • Extension of footstreet areas and hours of operation so as to improve air quality, reduce noise and improve overall city centre environment.	2291/7816	CYC Environmental Protection Unit

Section 5: York City Centre continued

Paragraph etc	Comments	Ref.	Name
Question 5 continued			
	- Noise must be considered in locating sites for development, so no loss of amenity. - Land contamination must be considered in locating sites for development, to ensure no risks to health or environment.	2291/7816 continued	CYC Environmental Protection Unit continued
	Supports overall emphasis, however there is a need to consider suitably and sustainably located sites for hotel, leisure, residential and employment development.	2517/7897	Lands Improvement
	In planning for housing in centre, regard must be had to a robust SHLAA, which accurately identifies potential capacity of city centre sites. Concerns over assumptions made in respect of capacity of city centre sites, in particular those regarding delivery of apartments and timescales for delivery of housing on sites. Detailed consultations must be undertaken on draft SHLAA before approach to city centre can be finalised.	2524/7929	Barratt Homes (York) Ltd
	Support proposals to enhance City Centre as a regional destination to reflect its role as cultural, economic and social heart of city and preparation of AAP to help guide development there.	2527/7945 2528/7969 2537/7993 2688/8017	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Supported.	2698/8235	Commercial Estates Group and Hallam Land Management

Section 6: York Northwest

Paragraph etc	Comments	Ref.	Name
General			
	Key part of planning for places and more justification needed in strategy. Should be within the 'Building Confident, Creative and Inclusive Communities' section with linkages to other sections. Should establish and justify boundary in Policy CS3. CABE suggest stronger hook needed to AAP with a diagram and mini brief.	1/7094	Government Office
	Risk that area will be overdeveloped, to compensate for high infrastructure costs. Doubtful if housing and office space forecasts can be achieved while incorporating an adequate green infrastructure. Essential that the sites are developed within a comprehensive approach. That this could be the site for new community stadium and supporting facilities appears to have been discounted in favour of commercial considerations. Targets for office space unrealistic. Current thinking is moving away from concentrated large floor plate developments, and would be no advantage to City, as development at this scale would be taken up by inward commuters. Brief for site needs a radical re-examination.	52/8329	York Environment Forum
	Does this adopt an "all your eggs in one basket approach" given that large targets and allocations are placed within a project, which would appear to be very difficult to deliver, even in long term? To unlock site, infrastructure funding needs to be sourced at a time when this is unlikely, even in the medium term. Densities and targets set for development are very challenging to deliver. Housing targets set include apartments; market appetite makes targets challenging, thus even in the long term goals are ambitious. Office accommodation targets set appear to be unrealistic particularly given empty rates etc. Can the British Sugar site be relied upon? Recognise this is a massive opportunity holding great significance for York. Proposals appear to have a lack of ambition for area. Can targets set be diversified across numerous areas thus diluting risk? Would Council consider the change of an existing major project, e.g. Hungate to take the weight of some of the issues? Could the swapping of poor quality Green Belt or other areas of land i.e. Hungate, be a solution to deliver and allocate areas of York Northwest as green open space/central park land etc to play to green wedge theme? Recent announcement that development process for York Northwest has been put on hold by key stakeholders, supports view that other sites must be identified in short and medium term. Such sites must be deliverable and could include additional sites in draft Green Belt.	57/7214	York Property Forum

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
General continued			
	Should make more of cultural, leisure and tourism opportunities (especially near NRM). Should be more explicit reference to need to improve pedestrian access over Ouse from NRM/station area to the Museum Gardens side of river. Public realm and green infrastructure investment will also be important to avoid York Northwest being standalone and integrate it back into rest of city centre.	373/8219	Visit York
	Supports inclusion of a section on York Northwest, which emphasises significance of opportunity that is presented by this site. Currently there is a bid for an Accelerated Development Zone (ADZ) at York Northwest. Consideration should be given as to how policies provide links to proposed ADZ.	479/7736	Yorkshire Forward
	Section should outline distinction between two sites, particularly in respect of mix and quantum of development, and provide for proper phasing of development, which may occur separately for two sites. Important to outline appropriate uses for both sites in isolation. On British Sugar support following land uses/principles: - Residential led regeneration, with a masterplan to be prepared with Council; Open space provision; Local shopping provision; and Sustainable transport measures.	525/7512	Associated British Foods plc
	Needs to recognise with greater emphasis failure of delivery of York Central and make greater allowance for delay in, or even total absence of, delivery of housing during plan period. Predicted rate of delivery appears to be too optimistic, and of an inappropriate type or mix. Prediction for British Sugar over-estimates potential significantly. Figure of 725 would be more appropriate as a potential maximum and should be discounted significantly in terms of absence of AAP and uncertainty about delivery and ability. Overall contribution from York Northwest should be reduced to 1,000 housing units as a maximum and, to be prudent, would be better to disregard potential for contribution to housing provision. Extent to which York Central can provide housing needs to be reviewed after AAP is produced and whether any contribution can be made must remain uncertain. Consideration of requirement for B1(a) space and height and disposition of office block buildings needs to be resolved before question of availability of land for housing can be ascertained. Due to such an uncertain outcome, inappropriate to make large-scale provision for housing within forecasted delivery from York Northwest.	610/7781	Mr G E Wright
Introduction			
Paragraph 6.1	Welcome explicit reference to delivery of York Northwest being essential, however note that reference to fact that site “could” have a role in enhancing York’s retail offer, and that it “could” also have a key role in enhancing York’s commercial, leisure and tourism offer does not accurately reflect the LDF evidence base. Emphasis should be on basis that site will have a role to play in meeting City’s needs for mix of uses identified.	214/7316 621/7362	Network Rail National Museum of Science & Industry

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
Introduction continued			
Paragraph 6.1 continued	Support recognition that York Northwest represents largest development site that York will see in its lifetime and that its delivery will be essential to meeting vision.	525/7513	Associated British Foods plc
Context			
Figure 10	Should include arrows identifying linkages to existing City Centre, and that City Centre should ideally be at same scale as York Central and British Sugar, to properly illustrate proximity of York Northwest to City Centre, and spatial relationship between two areas.	214/7317 621/7363	Network Rail National Museum of Science & Industry
Paragraph 6.7	Agree and support reference to integration of new residential communities and associated social infrastructure with City. This is one of fundamental objectives to be addressed in redevelopment of British Sugar site.	525/7514	Associated British Foods plc
	New bullet point: - “Ensuring any increase in emissions of carbon dioxide and oxides of nitrogen from the site are minimised and offset by mitigation measures in other areas of the city where necessary”.	2291/7817	CYC Environmental Protection Unit
Context - Employment			
Paragraph 6.8 - 6.9	Should be made clear that Entec Land Review identifies that new office quarter should be located on York Central (as part of York Northwest).	214/7318 621/7364	Network Rail National Museum of Science & Industry
Context - Housing			
Paragraph 6.10	Distinction should be made in terms of housing capacity for both sites, which would then be consistent with distinction made in sub-headings Paragraphs 6.8, 6.9 and 6.11.	525/7515	Associated British Foods plc
Context - Retail			
Paragraph 6.11	Does not adequately acknowledge implications of failing to accommodate identified capacity. Whilst York Central is currently out of centre it is recognised within RSS as a regionally significant investment priority, which will play a key role in developing economy of York area. Failure to plan positively for growth could result in existing out of centre retail parks seeking to accommodate identified capacity. Development at such locations adds little to the diversity of York City Centre, does not claw back leakage of expenditure to City Centre or improve City's market share. Properly planned and integrated with City Centre, York Central could help to deliver these benefits. Reference should be made within text that this work is being done to identify a solution that does not unacceptably impact upon vitality and viability of existing city centre.	214/7319 621/7365	Network Rail National Museum of Science & Industry

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
Context - Local Services			
Paragraph 6.12	To ensure adequate flexibility amend text as follows: - "To meet the needs of future residents, employees and visitors, and ensure the development of sustainable neighbourhoods, appropriate provision will be sought on from the development of York Northwest or via developer contributions for key services and facilities including public open space... built sports provision, local shops, education, healthcare and other community facilities subject to financial viability and consideration of the five tests planning obligations must meet, as set out in paragraph B5 of Circular 05/2005 ". Scale and type of any planning obligations arising from development of York Central will be wholly dependent on a balance being struck between many aspirations sought by Council, in context that overall scheme must be viable to be delivered.	214/7320 621/7366	Network Rail National Museum of Science & Industry
Context – You Told Us			
Paragraph 6.13	Acknowledge complexities and potential to deliver employment, retail and leisure uses.	2542/8062	Moor Lane Consortium
The Preferred Approach			
Paragraph 6.14	Numbers need translating into the broader spatial strategy. Also scope for a locally distinctive strategic sustainability policy that could signpost policies for a low-carbon community in AAP along lines suggested for eco-towns in Eco-town annex to PPS1.	1/7095	Government Office
	Statement that "the site will be developed for up to 3,030 dwellings" is too prescriptive at this stage. Recognised that this figure is based upon recent SHLAA findings, however for purposes of flexibility, and to reflect fact that exact number of dwellings will be determined through detailed masterplanning and viability testing, preferred approach should refer to "around" 3,000 dwellings on York Northwest. This element of flexibility is important, as Core Strategy needs ability to accommodate growth identified in emerging IRS. Also notes "potential for new comparison retail will also be explored". This is inconsistent with findings of Retail Study, which states sites most appropriate for large-scale retail development over forthcoming LDF period are Castle Piccadilly and York Central. Principle of retail development on site is based on evidence gathered to date, and preferred approach should reflect this.	214/7321 621/7367	Network Rail National Museum of Science & Industry
	Addition of following sentence: - " The sustainable measures chosen for use on the site will support a wider LES to ensure that emissions of both carbon dioxide and oxides of nitrogen are adequately controlled ".	2291/7818	CYC Environmental Protection Unit
Paragraph 6.16	As Plan period is to end of 2030, query whether end date of York Northwest AAP should also be amended to 2030 to be in conformity with overarching Core Strategy.	214/7322 621/7368	Network Rail National Museum of Science & Industry

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Paragraph 6.16 continued	Addition of following bullet point: - “An area where emissions of both local and global pollutants are kept to an absolute minimum and where emissions are considered at every stage of development and use”.	2291/7819	CYC Environmental Protection Unit
Strategic Objectives	Should be amended to recognise wider significance of York Northwest and importance of maximising unique opportunity it offers to contribute to overall economic prosperity of region and sub-region, as well as city itself. Consideration should be given to potential of extending city centre boundaries to include parts of York Central particularly eastern section of site. Would further support development of York Central into a high-density mixed-use development including a Central Business District on a highly sustainable and accessible part of city centre.	479/7737	Yorkshire Forward
	Support first objective including reference to creation of “inclusive communities”, which is a helpful recognition of the two distinct development areas. Support second objective. Whilst support 3 rd objective with inclusion of additional words: - “To maximise a unique opportunity to meet the objective of sustainable regeneration and housing needs, which will contribute to the overall economic prosperity of the City.”	525/7516	Associated British Foods plc
	Should be re-stated to place priority upon establishment of office provision in York Central.	610/7782	Mr G E Wright
	Reword as follows: - - To create exemplar new sustainable and inclusive communities of outstanding sustainable design which minimise emissions of both carbon dioxide and oxides of nitrogen To create a unique low vehicle use environment where priority and access is given only to low emission vehicles	2291/7820	CYC Environmental Protection Unit
Targets	Should refer to “around 3,000 dwellings” and “around 87,000 sq m employment space”. Should also be a target to include retail space within York Central.	214/7323 621/7369	Network Rail National Museum of Science & Industry
	Support target for office employment space. However, should not be listed as a minimum for site. Will need to be a flexible approach if a fully mixed-use scheme is to be delivered and should be reflected in Core Strategy. Identifying development of up to 3,030 houses is very specific. Would be better to indicate that 'around 3,000' houses are likely to be developed which will allow for greater flexibility in development of specific plans for site.	479/7738	Yorkshire Forward
	1 st Target: Residential capacity of both sites should be seen as a target rather than a ceiling. Final quantum of residential development should be determined based on site-specific considerations, which will evolve during masterplanning and preparation of AAP.	525/7517	Associated British Foods plc
	Should be re-stated to place priority upon establishment of office provision in York Central.	610/7783	Mr G E Wright

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS3	Should be amended to refer to “around 3,000 dwellings” and “around 87,000 sq m of office employment” to achieve desired flexibility. Reference should also be made to retail floorspace within Policy.	214/7324 621/7370	Network Rail National Museum of Science & Industry
	Amend to around 3000 dwellings.	479/7739	Yorkshire Forward
	Object to reference to up to 3,030 dwellings. Should be seen as a target figure and not a ceiling. Should be replaced with words “about 3,030 dwellings”. Final quantum should be determined through AAP. Priority should be given to re-use of sustainable brownfield sites, such as British Sugar, and to unnecessarily restrict quantum of residential development pre-judges development potential of site. Support promotion of sustainable transport modes, but consider policy should be re-worded to read: - “... and prioritising of sustainable transport modes ”. Reference to a community as a singular entity in second part of policy conflicts with thrust of section on York Northwest and second Strategic Objective. Suggest inclusion of reference to communities , as British Sugar and York Central will create two distinct and separate communities, albeit with emphasis upon integration with adjoining communities. Concerned that achievement of Vision would be compromised by inflexible application of general Core Strategy policies. Flexible approach to redevelopment of York Northwest should be incorporated into Core Strategy and following wording be inserted into Policy: - “Redevelopment of York Northwest will be assessed in the context of site-specific policies contained in the York Northwest Area Action Plan.”	525/7518	Associated British Foods plc
	Delivery is so uncertain that no reliance should be placed on site to meet housing or employment land targets.	606/7760	Jennifer Hubbard
	Support and appreciates that a coordinated approach towards development is required. Should consider Leeman Road site as part of wider regeneration area. Site could house a number of dwellings and/or associated commercial uses, and assist in meeting dwelling target set for Northwest area. Development of site would assist in wider regeneration of area, assisting in development of a 'sustainable new community'. Should consider proposals for individual and grouped sites to come forward, providing accord with policies of AAP. This flexible approach will increase opportunities for delivering residential and commercial development, allowing Council to meet housing and wider development objectives for area.	607/7775	CEMEX
	Would like to understand likely maximum level of office development so can be assessed. Elsewhere in document a range of 87,000m ² - 100,000m ² is used. Can it be assumed that maximum level of office development would be 100,000m ² ? Request that a maximum level or range of office development is added to policy rather than a minimum.	2434/7846	Highways Agency

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS3 continued	Development should ensure that it conserves and enhances historic setting and character of York. Should be reworded to "The development will be an exemplar of sustainable development whilst conserving and enhancing the historic environment of York. "	2542/8063	Moor Lane Consortium
Question 6			
	The mix of uses should be that needed to deliver the strategy.	1/7096	Government Office
	Mixed use is in keeping with the housing and employment hierarchies and therefore more likely to result in more sustainable journeys.	4/7126	Natural England
	Hope that development will have sufficient good quality open space and provide mitigation for very important habitat for invertebrates. Also see comments on Questions 3 and 5.	49/7187	Yorkshire Wildlife Trust
	Believes Council is overly optimistic with regards to delivery of development and anticipated phasing/build out rates. Likely to be a significant dwelling shortfall from York Northwest and other sites which vision and approach heavily relies upon. Council have not yet provided a definitive breakdown of land uses over whole site. Given as now at Preferred Options stage, concerned that Council is overly reliant on scheme that is not even finalised. Core Strategy refers to target for adopting York Northwest Area Action Plan by 2011. However, site may not be completing housing until 2013/2014 at earliest. Until this plan is significantly progressed, believes it is not realistic or achievable to be considering this site could deliver 3,030 dwellings by 2030. Need to ensure sufficient number of houses is provided within development to meet housing market needs. Careful consideration needs to be given to type of home the market will require to be delivered and impact that this will have on density and capacity assumptions. Overall have serious concerns on ability of York Northwest to deliver aims and aspirations. Not convinced that area will deliver anticipated scale of development in LDF period and therefore believe need to reconsider overall strategy for releasing further land, to ensure a rolling five year supply of deliverable land.	161/7243	Persimmon Homes (Yorkshire)
	Satisfied that a reasonable mix of uses is being promoted. However, whilst draft SHLAA indicates a capacity for 3030 dwellings, further consultations with key stakeholders, in particular house building industry should be undertaken before policies controlling development can be finalised. Concerned that site capacity figures may be based on overly high-density assumptions and that assumptions for delivery are not realistic given current market conditions. Also concerns over credibility of current draft SHLAA and considers that this must be completed before policies controlling development at York Northwest can be finalised.	164/7259	Hogg Builders (York) Ltd

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
Question 6 continued			
	Obviously correct to ensure a mix of uses, but there are major stumbling blocks towards creation of these new communities here. The only way that 3,030 dwellings will be accommodated on this site is by building apartments. Houses take up much more room and market will not support apartments at present time. Indeed Council do not want to see too many apartments in future. Unrealistic to assume that 3,000 + homes, which are not apartments, can be delivered on this site. Given that York Northwest is foundation stone for most of figures relating to take up and supply of new homes this is a fundamental error in calculations and will lead to more land being required elsewhere. Only way that 87,000 sq m of office space can be delivered in this site is by providing 6/7 storey buildings with enormous footplates, which cannot be funded by developers given size of such a building that needs to be delivered in one go. Average take up is some 12,000 m per annum and size of these buildings would need to be in region of 300,000 sq ft, which given empty rates liabilities, funding restrictions and annual take up is not viable. Assuming York Northwest can support these figures is fundamentally wrong and will lead to no supply and land being required elsewhere for development. This needs to be considered very carefully as at present time assumptions are not achievable.	198/7284	The Helmsley Group
	Agree with proposals, however doesn't seem to be any sports or leisure facilities proposed.	218/7400	Northern Gas Networks
	Given acknowledgement within both current national policy guidance and draft PPS15 that principles of sustainable development have particular relevance to management of historic environment, strategy for this area should clearly state need to safeguard significant historic assets surrounding part of city covered by this AAP.	242/7426	English Heritage
	Provision has been made for a number of sites in growth forecasts for next financial period 2010-2015. Does not include some key sites: - Provision for 600 new dwellings at York Central; Included Hungate and Germany Beck; Not included Nestle South, Derwenthorpe and Terry's. Not made any allowance for windfall sites in growth forecasts submitted in 2010-2015 Business Plan. Difficult to include this type of growth, as do not know where developments will take place. May be insufficient capacity for some windfall sites, in particular greenfield sites.	320/7452	Yorkshire Water
	Not quite. No need for any comparison retail on site and no need for proposed large-scale office development near station. Smaller scale employment opportunities and local retail to service housing and on-site employment should be prioritised. Would free up more space for meeting housing and leisure requirements.	458/7572	York Green Party
	Supports proposed mix of uses. Whilst site is considered appropriate for B1(a) uses, other types of employment uses are not proposed. Other sites such as North Selby will therefore need to be identified for such uses.	515/7498	UK Coal Mining Ltd

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
Question 6 continued			
	Support mix of uses, although consider there should be recognition of distinction between the two sites. Throughout Section, there are passing references to York Central, but no specific reference to British Sugar site. Given scale and magnitude of both development sites, and associated sustainability benefits arriving from their redevelopment, appropriate to define both sites, together with proposed mix of uses, with recognition there are overlapping issues which apply to both sites. Supports uses listed in general comments in this section (Ref 525/7512) as being appropriate on British Sugar site. However, number of uses which would be inappropriate here e.g. Class B2 and B8 employment uses due to effect on residential amenity for existing and proposed communities and potential traffic implications.	525/7519	Associated British Foods plc
	AAP needs to look comprehensively at site and understand how best it can integrate into existing community. Range of uses appears reasonable and appropriate however given challenges to site's delivery urge City to look for early wins in site's development.	546/7701	Miller Homes Ltd
	Keen to ensure that 'sustainable' development is sustainable for local air quality and not focused solely on reducing emissions of carbon dioxide. To ensure all emissions are adequately controlled area should be developed as a LEZ. This concept and local air quality should be given further consideration during development AAP. Important that land contamination is considered. Site investigation and remediation works will be required prior to redevelopment (Annex 2 of PPS23).	2291/7821	CYC Environmental Protection Unit
	No objection to inclusion of York Northwest and note Councils approach that seeks to deliver an AAP by 2011. Range of uses appears to be reasonable and appropriate however have major concerns about timetable for delivery of development from site and reliance upon it within Core Strategy. Delivery is both complicated and expensive in any market conditions. Site's capacity may be less than anticipated and delivery rates and completions are likely to make a significantly lower contribution to supply of development over plan period.	2510/7873	Taylor Wimpey UK Ltd
	Will be a key site in delivering vision. Site is clearly suitable for development. However, two fundamental issues remain substantially unresolved at this stage: - (i) Timescale, in particular whether site can make a meaningful contribution to development needs in Plan period; and (ii) Quantum - can site accommodate amount of development suggested. Significant infrastructure constraints. Could be some time into Plan period before these are resolved. In short to medium term will be even greater reliance on sites such as Terry's that can deliver houses and employment floorspace City needs, which should be acknowledged.	2523/7917	Grantside Ltd

Section 6: York Northwest continued

Paragraph etc	Comments	Ref.	Name
Question 6 continued			
	In broad terms satisfied that a reasonable mix of uses is being promoted. Concerned that site capacity figures may be based on overly high density and delivery assumptions. Concerns over credibility of current draft SHLAA and considers must be completed before policies controlling development at York Northwest can be finalised.	2524/7930	Barratt Homes (York) Ltd
	Comprehensive manner in which development of site will be guided and mix of uses proposed within it are supported. Development of area will present an opportunity to deliver considerable infrastructure improvements to city. To optimise benefits for duration of Core Strategy period and beyond should bear in mind opportunities provided by Area of Search Site I for employment and commercial uses and subsequent development of Area F for residential and ancillary community uses. This would not undermine principles of regeneration and brownfield development and can inform a balanced approach to development of City along with appropriate consideration of Green Belt boundaries.	2527/7946 2528/7970 2537/7994 2688/8018	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Should be a commercial and employment led regeneration scheme of which residential provision forms a part	2542/8064	Moor Lane Consortium
	Concerned that Flood Risk has not been sufficiently factored into Figure 10 and any wider proposals. Also concerned over traffic impact upon already heavily congested outer ring road to immediate west. Identified capacity of 3,000 dwellings needs to feature in a realistic delivery trajectory along with a breakdown on housing type.	2689/8148	Monks Cross North Consortium
	Concern regarding deliverability. Both sites have significant access difficulties. Proportions of employment to housing in York Central have changed a number of times. Whole of this site lies within flood risk zones 3a and 3b. Vehicular and public transport links to and from British Sugar are currently poor. As delivery of York Northwest will be essential to meeting Vision in delivering both employment and housing and possibly having a role in enhancing retail, commercial, leisure and tourism offer, if it does not come forward then clearly Vision will be at best compromised but at worse completely flawed. Whilst identified as having a capacity for 3,030 dwellings, no information given regarding type and mix of these dwellings. Further concern is viability of site for development given infrastructure requirements, possible contamination of parts of site, affordable housing requirements and potential flooding issues and mitigation requirements not forgetting access and land assembly issues.	2698/8236	Commercial Estates Group and Hallam Land Management

Section 7: York's Special Historic and Built Environment

Paragraph etc	Comments	Ref.	Name
General			
	This theme could be the key driver of the strategy. See comments under General (1/7084) and Vision (1/7085).	1/7097	Government Office
	Finalisation of City Centre AAP should not be influenced by World Heritage bid. Major investment in public realm essential regardless of such a bid, and should be led by a competent design panel with access to Council at highest level. Welcome recognition that views within historic core and from outside it are of significance.	52/8330	York Environment Forum
	Note support for production of Conservation Area Appraisals, Parish Plans and Village Design Statements and where appropriate these will be adopted as SPDs. Urge that Heslington's VDS is also adopted as a SPD to prevent further degradation of local area.	56/7209	Heslington Parish Council
	Endorse views that new development needs to deliver high quality urban design, architecture and public realm. Could be more supportive about value of appropriate new investment. Public realm is also important to residents; hence any distinction with visitors is unnecessary. Public realm should also be reflective of and complementary to cultural life of city.	373/8220	Visit York
Introduction			
Paragraph 7.1	Essential to include wording at beginning of paragraph, which captures importance of architectural personality of city - 'York's historic heritage is amongst the richest in England and is a significant asset and resource for the city: it defines the physical personality that makes York such a vibrant place to live in and, for millions of tourists, to visit'.	110/8305	York Civic Trust
Context - Local Issues			
The City's Central Historic Core Paragraph 7.6	Final sentence lacks clarity. Suggests - 'Policy and guidance for new development on open land and interventions to regenerate the existing historic fabric of the city must be sensitive to its architectural personality, spatial patterning and its remarkable views'.	110/8306	York Civic Trust
The City's Central Historic Core Paragraph 7.9	Don't consider a successful bid for World Heritage Status would necessarily increase tourism pressure on city. Attracting more discerning and potentially wealthier visitors may bring different types of pressures but might be preferable to handling day-trippers or stag/hen nights.	458/7573	York Green Party
City Wide Features	As well as village identity being related to size, it also stems from a community's history so recognition must be given to what the community values, as identified through a Local List. Mention of this is absent.	203/8316	Ms J Hopton
City Wide Features Paragraph 7.12 - 7.13	Strongly support protection of important views both from within and towards city centre. Important to give explicit attention to visual amenities of boundary between Conservation Areas and Green Belt by setting strict rules for development conspicuous from Green Belt, that might be visually detrimental. Could significantly reduce risk of inappropriate development proposals in and around Conservation Areas that are visible from Green Belt.	70/8203	Fulford Parish Council

Section 7: York's Special Historic and Built Environment continued

Paragraph etc	Comments	Ref.	Name
Context – You Told Us			
Paragraph 7.14	Support principle of adopting Parish Plans and Village Design Statements as SPDs. Local List of buildings and spaces, considered important by local communities should be adopted.	70/8204	Fulford Parish Council
	Support all comments.	458/7574	York Green Party
The Preferred Approach			
General	Add new paragraph 7.18 - 'Specifically, proposals for new development will be assessed by reference to their appropriateness in relation to the following architectural criteria, which will be assessed by reference to design guidance on: scale, height, rhythm, grain, protected views, siting, perceived mass, articulation, texture, materials and interconnectivity of spaces.'	110/8308	York Civic Trust
Paragraph 7.16	Amend to read - 'In moving towards Preferred Options, the Council has responded strongly to the need to protect York's historical, architectural and archaeological wealth and their centrality to the personality of the city. This is recognised by a) restating the authority's duty...' Line 4 - amend b) to 'encouraging and ensuring...'	110/8307	York Civic Trust
	Support.	458/7575	York Green Party
Paragraph 7.17	Support objectives and targets. Reappraise Conservation Areas every five years.	458/7576	York Green Party
Strategic Objective	Amend 'Delivering the quality city' to read 'Celebrating the special personality of York'.	110/8309	York Civic Trust
Targets	Add as 3 rd bullet: 'Completion of Special Policies concerning factors listed in Paras 7.17 and 7.18 by 2012.'	110/8310	York Civic Trust
	Final Target would be better located within Section 8 on Housing.	242/7428	English Heritage
Policy CS4	a) Insert 'and architectural' after 'historic' in line 1 b) Insert 'see Para 7.18 above' after 'local form and scale'. d) Insert 'for the benefit of residents and' after 'environment,'	110/8311	York Civic Trust
	Criterion (a) as currently drafted, is extremely generic. Does not develop upon national policy guidance and fails to identify what is needed in order to adequately manage York's particular set of historic assets over plan period. Should be rewritten along following lines: - “(a) Protect and, where appropriate, enhance those aspects which contribute to the special character and setting of the historic City, particularly: - • The medieval buildings and street pattern within York, especially its City Walls and Bars, the Minster, churches, Guildhalls and Clifford's Tower. • The urban grain, street layout, building plots and snickleways. • The extensive and internationally important archaeological deposits beneath the City. Where development is permitted, the potential to utilise this resource for socio-economic and educational purposes for the benefit of both York's communities and those and the wider archaeological sector will be explored.	242/7427	English Heritage

Section 7: York's Special Historic and Built Environment continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS4 continued	• The setting of the City within its rural hinterland and the green strays, which penetrate into the heart of the urban area. • The skyline of the City especially views of the Minster. • The legacy of factories, housing, buildings, structures and spaces associated with the City's railway and chocolate manufacturing heritage". Should also consider including identification and management of those assets which, although not formally designated, make an important contribution to distinctive character of locality and which local community value. Additional bullet point should be added along following lines: - "Work with the community to identify those aspects of the historic environment which they consider to be important to the character of their locality and to develop a strategy for their protection and enhancement".	242/7427 continued	English Heritage continued
	Clarification should be provided to ensure that need for development to respect local form and scale does not restrict opportunity York Northwest presents for something new and different.	479/7740	Yorkshire Forward
	Should identify geographical area of Central Historic Core. Other than referring to proposals for a Conservation Area Appraisal, all matters addressed represent a repeat or re-formulation of existing national policy and should be deleted. Should be a requirement to produce a SPD, which addresses building heights with regard to views of Minster both from within city walls and in key distant views, and York Northwest and area covered by York Northwest AAP.	606/7761 610/7784	Jennifer Hubbard Mr G E Wright
	2 nd Bullet (b) - needs to be made explicit that a high-density urban environment that could adversely affect historic environment of city centre should be avoided. Should be reworded to "Development should respect local form and, scale and be of an appropriate density, especially in the city centre , and ..."	2542/8065	Moor Lane Consortium
Question 7			
	Hope that while preserving historic character of York features which are important for wildlife and are found in older buildings such as bat roosting opportunities, and nest sites for birds with rapidly declining populations such as Swifts will be protected.	49/7188	Yorkshire Wildlife Trust
	Generally support approach taken but consider it essential to include a capacity study.	70/8205	Fulford Parish Council
	Agree with policy and don't feel any further assessments are required.	218/7401	Northern Gas Networks

Section 7: York's Special Historic and Built Environment continued

Paragraph etc	Comments	Ref.	Name
Question 7 continued			
	Sets out good overall framework. However, supporting text should be expanded to include numerous buildings and areas associated with railway industry and chocolate manufacturing which also contribute to distinct identity of City. Support range of contextual guidance proposed. In terms of additional studies Council might undertake suggest following: - • Urgent need for some assessment of capacity of historic environment of City to accommodate further growth. This would comprise: - (a) Identification of those elements, which are considered to contribute to special historic character or setting of York; (b) An assessment of how sensitive those elements are to change; (c) Establishment of measures for monitoring change to those assets; (d) Identifying how change, which might harm those assets, might be managed (through, for example Policies within LDF, strategic directions of growth etc). • Definition of what Council considers are elements, which contribute to York's special historic character and setting. • Evaluation of success of past management strategy for archaeological resource of City (including assessment of principles set out in 1992 Arup Report). • Production of a historic environment strategy for City.	242/7429	English Heritage
	'Local List' of treasured buildings should be compiled as a formal part of LDF, presumably a SPD. Could be based on Local List already compiled and published by Local Planning Forum. Guidance should be produced regarding relationship between historic built environment and new sustainable building, as well as retro-fitting for energy efficiency and renewables.	458/7577	York Green Party
	Incorporation of LES based measures into LDF would have added value, in terms of improving public realm, supporting tourism and protecting historic buildings.	2291/7822	CYC Environmental Protection Unit
	City Centre's unique character is an asset that should be protected. Steps proposed within policy are appropriate and are worthy of support.	2527/7947 2528/7971 2537/7995 2688/8019	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Proposed Policy is generally supported.	2698/8237	Commercial Estates Group and Hallam Land Management

Section 8: Housing Growth, Distribution, Density Mix and Type

Paragraph etc	Comments	Ref.	Name
General			
	Housing trajectory needed to show can deliver housing requirement over plan period.	1/7098	Government Office
	we would welcome more information about how the Core Strategy approach to housing distribution dovetails with the allocations DPD. Other than the strategic sites there is little certainty at this stage over the broad areas of potential for further housing development.	2/	Local Government Yorkshire & the Humber
	See also comments on Background (Ref 52/8324). Requirement of 4431 additional units, at 30 units per ha needing 135 ha, is far short of total required to accommodate possible population growth. If estimated of shortfall of 10,285 units, in comments to Background, requiring 342 ha is correct, total land requirement is 135 + 342 ha = 477 ha. Areas A and B only provide 210 ha leaving an additional land requirement of 267 ha. As areas F and E have been eliminated in topic paper 1, clear that only a massive incursion into Green Belt elsewhere will provide necessary space. If forecasts of possible population growth are unsustainable, LDF must acknowledge this. Higher densities could be achieved to reduce land take, but would only be acceptable if standards of design were acceptable. While LDF acknowledges that demand for gypsy and traveller sites is not being met, targets are insufficient and time scale for provision is too long.	52/8331	York Environment Forum
	Proliferation of multi-occupation households, in particular for student occupation e.g. Badger Hill, The Crescent and Holmefield, impact on local area. Understand that legislation may be introduced to counteract this trend. Endorse this legislation since Heslington and Badger Hill are in the front line of the effects of such student colonisation.	56/7212	Heslington Parish Council
	Targets are extremely ambitious, given windfall gains and having to potentially offset certain requirements to be able to achieve figures they set out. Density figures quoted seem to contradict need for more houses rather than apartments. Committed development figures are based on permissions not yet implemented. Highly unlikely all these projects will go ahead. May be even higher dwelling requirement than stated.	57/7218	York Property Forum

	Housing growth is in line with RSS and so is supported. Particularly welcome concentration of 98% of growth within, or adjacent to, City of York. Growth of knowledge economy will require a range of housing types, and encouraging development of houses as well as flatted developments is supported. However, concern that overly focussing on provision of houses over flats does not sufficiently recognise changing demands for housing and implications of current recession in terms of access to finance for housing and how this is affecting housing choice. Need for flexibility in such targets, particularly in terms of additional land requirements that development of houses entails. Demand for housing that will be created by Heslington East scheme should be considered. While a proportion of students will be accommodated within University accommodation, likely to be a significant population in private sector housing. There will also be a need to accommodate increased number of people working for University. Likely to put pressure on housing market in immediate locality of Heslington East site and needs to be considered.	479/7741	Yorkshire Forward

Section 8: Housing Growth, Distribution, Density Mix and Type

Paragraph etc	Comments	Ref.	Name
Introduction			
Paragraph 8.1	Housing targets in RSS are too high to be sustainable. Will be challenged through IRS.	458/7578	York Green Party
Housing Growth and Distribution Context - Policy Context			
Paragraph 8.2 - 8.6	It is problematic to view York as part of Leeds sub-area. Because York is an attractive town in which to live, many residents commute to work elsewhere. Must be stronger mechanism that protects housing stock from being bought to let by commuters to other areas. York could otherwise still be left without a housing stock that would meet needs of local population and although it might superficially meet housing quotas, it would not solve problems of local inhabitants being priced out of market. Housing quotas need to be adjusted to lower standards than those set in the RSS. Capacity study is in order before figures can be set.	70/8206	Fulford Parish Council
	Housing targets in current RSS are far too high to be sustainable. Challenge need to extend LDF period to 2030. Should be kept in line with RSS at 2026. LDF along with other strategies and plans will need to be constantly reviewed in light of a challenging global environment, so no detriment in slightly shorter timescale.	458/7579	York Green Party
	Evidence base behind RSS requirement has been updated. CLG 2006 base forecasts released in March 2009 indicate an annual requirement for York to be nearer to 1,400 per annum. While not expecting LDF document to depart from current RSS, requires Council to give further thought to a flexible Green Belt boundary.	2689/8149	Monks Cross North Consortium

Draft Consultation Statement & Schedule of Responses (2010)

Paragraph 8.4	Object as level of provision is too low. Fails to take into account any potential increase in requirement in IRS. Number is less than needed based on growth projections. Setting a housing requirement that is below known need will only increase resulting shortfall. To define Green Belt boundaries to at least end of plan period must be flexibility to provide an appropriate level of land supply to meet future housing need.	2542/8066	Moor Lane Consortium
Paragraph 8.6	Agree that Council must plan to deliver against housing targets set out in RSS. It should do so by working with development partners to identify deliverable sites as well as creating a sympathetic policy framework taking into account viability. Work on preparation of IRS should not delay plan preparation.	165/7271	Home Builders Federation
	Linking this paragraph to Questions 3 and 4, there is a clear attempt to rally support for a challenge to strategic housing requirement in RSS and “lead” responses, which is entirely unfair in this consultation. Core Strategy should not set out questions associated with scale of development, which have been extensively debated and reported on at regional level. This undermines plan-making process. Equally true in respect of Council’s question in respect of windfalls, which fails to fully explain background and context to government guidance in PPS3, which rules, out reliance upon windfalls and requires LPAs to positively plan for their area. Approach side steps challenges of necessary planned housing delivery.	546/7702 2510/7874	Miller Homes Ltd Taylor Wimpey UK Ltd

Section 8: Housing Growth, Distribution, Density Mix and Type

Paragraph etc	Comments	Ref.	Name
Housing Growth and Distribution Context – Local Issues			
General	Makes no reference to specific demands from students on local housing market. Whilst acknowledging obligation to provide housing on campus for all growth in student numbers after 2008, existing students are not all able to be housed on campus. Other HE providers also create demands for student housing. Predictions must take proper account of growth in HE and demand for student housing. It should also include students in strategic objective.	190/8279	University of York
	Note continued reference to SHLAA and its ability to identify sufficient sites to meet majority of Council’s requirements over next 15 years. Having submitted sites into SHLAA process concerned that material presented is inaccurate or lacking in adequate consultation with site owners or developers as required by guidance. For Core Strategy to be found sound, essential that a robust SHLAA is produced and signed off by industry in advance of Core Strategy EiP.	2689/8150	Monks Cross North Consortium
Paragraph 8.09	Housing figure for York Northwest should refer to “around 3,000 homes”	214/7325 621/7371	Network Rail National Museum of Science & Industry

Draft Consultation Statement & Schedule of Responses (2010)

	None of sites have delivered any meaningful development with only Hungate at implementation stage. Emphasises concern over significant challenges to delivery of housing, which is not being positively addressed. Placing over reliance upon a series of sites, which are likely to be delayed and only deliver a small proportion of full potential, particularly in early years of plan. Should look to encourage broader range of small to medium sized sites, which could better stimulate delivery of actual development.	546/7703 2510/7875	Miller Homes Ltd Taylor Wimpey UK Ltd
	Would be helpful if Core Strategy could indicate a delivery trajectory.	2689/8151	Monks Cross North Consortium
Paragraph 8.10	This statement is welcomed.	214/7326 621/7372	Network Rail National Museum of Science & Industry
Paragraph 8.11	Support SHLAA's finding.	2542/8067	Moor Lane Consortium
Paragraph 8.12	On basis of emerging SHLAA note shortfall of identified deliverable or developable land for 6,606 dwellings up to 2030. Objects to any windfall allowance, as contrary to Government policy. As SHLAA is not complete and review of sites in draft Green Belt area not yet been conducted it is premature to allow for such a large allowance. Shortfall represents 31% of overall housing target for planning period. This is unacceptably large. Also object to use of questionnaire leaflet (<i>Planning York's Future</i> : question 4) to elicit public support for a policy, which is contrary to Government planning policy. Question is a leading one, and does not provide sufficient background.	165/7273	Home Builders Federation

Section 8: Housing Growth, Distribution, Density Mix and Type

Paragraph etc	Comments	Ref.	Name
Housing Growth and Distribution Context – Local Issues			
Paragraph 8.12 continued	Support inclusion of allowance for windfall. Don't understand logic of including them after 2025/26 but not before. Surely reasonable to include an allowance from say five years hence.	458/7580	York Green Party
	PPS3 states plans should not include provisions for windfall except in most exceptional of circumstances. Given that full review and finalisation of SHLAA has yet to be completed inappropriate to even consider a windfall approach.	546/7704 2510/7876	Miller Homes Ltd Taylor Wimpey UK Ltd
	Challenge use of windfalls towards end of plan period. Approach to windfalls is not inline with requirements of PPS3 even though do not include these in first 10 years of land supply. Failed to take into account future trends. Provision of 2,175 homes from 2025/26 to 2030 is based on historic windfall delivery rates, which have been flat dominated. Given that 70% of all new homes delivered over plan period need to be houses, making an allowance for windfalls based on historic delivery that resulted in a flat dominated housing mix is inappropriate and made worse by very nature of windfall sites as Brownfield urban sites that often deliver flatted development. Allowance of 2,175 homes as windfall will only increase number of flats that come forward further unbalancing housing mix. A sound approach would be to exclude windfall allowance and identify more Greenfield land to ensure that right housing mix is achieved and 70% houses are delivered throughout plan period. Consider that all of 6,606 units that cannot be provided on urban sites should be provided on Greenfield sites. To accommodate, these based on densities used in SHLAA and Core Strategy and including an allowance for infrastructure and open space provision, 199.2ha of land will need to be found. Challenge densities used for anticipating number of dwellings that can be delivered from sites identified in SHLAA that includes both houses and flats at 70% and 30% respectively. This results in very high densities. If lower, more reasonable, densities are applied even more land needs to be found, especially considering suitability of providing flats in urban extensions and likelihood of large numbers of townhouses coming forward in urban areas.	2542/8068	Moor Lane Consortium
	Conclusion is contrary to PPS3. Windfall allowance should only be taken into account in exceptional circumstances. This has not been shown. A housing contribution from windfall sites should therefore be deleted.	2696/8185	Thomlinsons Solicitors of Wetherby
Paragraph 8.13	Do not support identification of sites A and B as 'areas of search' within draft Green Belt. Will make them vulnerable to applications from developers at any time during plan period, not only after later date specified in Plan. Do not believe that these locations are necessary to meet York's housing needs if these are set at a realistic and sustainable level.	458/7581	York Green Party

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Housing Growth and Distribution Context – Local Issues continued			
Paragraph 8.13 continued	No flexibility in land supply to account for exclusion of windfall sites, lower rates of delivery on key sites and a potential increase in housing allocation from 2026-2030 in IRS. Challenge that land at Monks Cross (Area of Search A) and Metcalfe Lane (Area of Search B) can provide up to 210ha of land. Combined total is 116.04ha. This is significantly lower than 210ha claimed. No evidence of, or assessment, that at least 93.96ha of 210ha is deliverable or suitable for development. Area of Search D (South of Moor Lane, Woodthorpe) on other hand can provide a defensible area for an urban extension that is known to be deliverable. Even if 210ha could come forward there would still be a need for a further 58.2ha to be found. Clear need for further land to accommodate an urban extension. Given that Area of Search C is suitable for employment use only then Area of Search D should be included as a preferred location for a residential urban extension. Area of Search D should also be included for an urban extension as there is uncertainty of ability of Areas of Search A and B to deliver required housing in later part of plan period. An urban extension at Area of Search D will help provide more balanced and sustainable growth rather than focusing all Greenfield development at east of city, which will have impacts on existing and required infrastructure.	2542/8069	Moor Lane Consortium
	Paragraph is supported.	2685/8111	Mr F R Pulleyn
	Support approach taken.	2689/8152	Monks Cross North Consortium
	Suggestion that Monks Cross and Metcalfe Lane are capable of providing more dwellings than identified requirement will have to be revisited if a proper approach to districts housing need is to be followed. Whilst sites may be suitable for residential development, consider they will not meet housing needs of district on their own. To achieve 850 dwellings per annum need to identify a range and choice of sites, particularly small and medium sized sites, which would be suitable for regional and local house builders.	2696/8186	Thomlinsons Solicitors of Wetherby
Paragraph 8.14	Agrees that majority of housing growth and development should be focussed within and around York. However, need for delivery of more than 2% of housing requirement in and around Local Service Centres, in order to meet local needs.	164/7261	Hogg Builders (York) Ltd
	Note suggestion that 98% of housing will be delivered within York itself. Apportioning only 2% to larger villages and Local Service Centres seems inadequate to address requirements of remaining and peripheral area. Sits uncomfortably with policy elsewhere in preferred option, not least need to address affordability concerns in rural area. Implication is that smaller villages will be allocated no new housing whatsoever. Disagree. Rural towns and villages need to play a more important role in accommodating development to remain sustainable.	165/7274	Home Builders Federation

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Housing Growth and Distribution Context – Local Issues continued			
Paragraph 8.14 continued	Agrees that majority of housing growth and development should be focussed within and around York. However, there is a need for delivery of more than 2% of housing requirement in and around Local Service Centres, to meet local needs.	2524/7931	Barratt Homes (York) Ltd
	Acknowledge that 98% of housing development over plan period will be to York itself.	2542/8070	Moor Lane Consortium
	Whilst bulk of housing growth should be directed to York itself, there is significant scope to accommodate development in surrounding larger Villages and Local Service Centres. These are needed to provide a proper range and choice of sites to meet all needs of residents. Also provides for creation of affordable housing in local communities allowing people to remain living in communities in which they grew up or spent majority of their lives.	2696/8187	Thomlinsons Solicitors of Wetherby
Housing Growth and Distribution Context - You Told Us			
Paragraph 8.15	Query how many respondents noted LDF should deliver levels of housing growth in RSS.	458/7582	York Green Party
	1 st Bullet - recognise public support for concentrating future growth within or adjacent to York's main urban area.	2542/8071	Moor Lane Consortium
Housing Density Mix and Type Context - General			
	Need to provide a mix of housing that reflects requirement of SHMA. Table 1 shows there to be more flats than houses committed in early plan period and a clear need to promote land for family housing. Several of major schemes identified at paragraph 8.9 are likely to deliver a large proportion of flats which only adds further pressure on shortfall of houses.	2689/8153	Monks Cross North Consortium
Housing Density Mix and Type Context – Local Issues			
Paragraph 8.17 - 8.19	Wary of specific targets for flats. Density should not be determined in advance. Each scheme should be assessed on its merits, taking into account considerations of viability and market demand. Market for apartments still weak. Even if it does revive, still a need to rebalance housing mix given number of high density developments delivered over last decade. Relying on high density schemes consisting of apartments is also unlikely to help secure ambitions to continue to make city a competitive location for new high value added employment since such a product is unlikely to appeal to this cohort of workforce. Need to consider more family sized housing as part of mix. Unavoidable that this will translate into a greater land take and requirement for more land supply in form of urban extensions of a variety of sizes in order to meet housing targets	165/7276	Home Builders Federation
Paragraph 8.18	Support that 70% of new residential development should be houses and 30% flats. Will need to be in suitable locations and at appropriate densities. An exclusive focus on Brownfield delivery at start of plan period will not deliver housing mix required to meet identified need for houses and will result in an over supply of flats.	2542/8072	Moor Lane Consortium

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach - Housing Growth & Distribution			
Paragraph 8.27	Reiterate comment at first Issues and Options consultation stressing that flood risk Sequential Test should be given equal importance within the housing chapter. Paragraph states that approach to identifying future land for housing is based on three sequential components, however flood risk Sequential Test is not mentioned. Does not reflect comments made at Issues and Options consultation stage, or PPS3. Although proposed Sustainability Appraisal objective, EN9 comments on reducing impact of flooding to people and property in York, would like to see social, economic and environmental impacts of flooding reflected fully in assessment of options against all SA objectives.	5/7148	Environment Agency
	Objects to approach. Three sequential components are not consistent with approach set out in SP3. First priority here combines first and second priorities of SP3; Second priority here is "similar" to third priority of SP3, however does not specify what is defined as "strategic extensions"; and Third priority here does not appear in SP3. Concerned with terminology in (ii). Extensions to main urban area do not necessarily need to be "strategic". Also no definition of what constitutes a "strategic extension". Smaller scale extensions to existing built up area, in sustainable locations provide an opportunity for sustainably led development, whilst also meeting housing needs in emerging plan period. Recommends: - Consistency between paragraph 8.27 and SP3; Greater flexibility of SP3 and Paragraph 8.27, allowing for "extensions" to York Urban Area; Definition of "strategic urban extension" to be clarified.	161/7245	Persimmon Homes (Yorkshire)
	Support brownfield & infill sites at i) with strong provisos about conserving green space & community facilities. Accept in general terms settlement hierarchy but contest weight to be given to it vis a vis other planning considerations such as density, environmental sustainability, flood risk, protection of biodiversity and local amenity, protection of open space & community facilities, impact on local infrastructure capacity and impact on York's historic character. Contention that sequential test has been met in terms of a) a brownfield/infill site or b) a Greenfield site, where it is claimed no suitable brownfield/infill site is available should not be given undue weight vis a vis other planning considerations. LDF should make this clear.	458/7583	York Green Party
	Spatial Strategy seeks to prioritise brownfield land in outlying settlements over and above development of greenfield land at York. Not consistent with RSS policy. Sustainability is more than a factor of a site's greenfield or previously developed status but must recognise location as a major factor. Outlying settlements are significantly inferior in sustainable planning terms to development at York and development of previously developed sites within them should be sequentially down graded within Spatial Strategy.	546/7705	Miller Homes Ltd

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach - Housing Growth & Distribution continued			
Paragraph 8.27 continued	Spatial Strategy seeks to prioritise brownfield land in outlying settlements over and above development of greenfield land at York. Not consistent with RSS policy. Sustainability is more than a factor of a site's greenfield or previously developed status but must recognise location as a major factor. Outlying settlements are significantly inferior in sustainable planning terms to development at York and therefore even development of brownfield opportunities within them should be omitted from Spatial Strategy.	2510/8322	Taylor Wimpey UK Ltd
	Objects to approach as not consistent with approach set out in SP3. Recommend following: - Consistency between paragraph and SP3; Greater flexibility of SP3 and Paragraph, allowing for "extensions" to York Urban Area; Definition of "strategic urban extension" to be clarified.	2517/7898	Lands Improvement
	Object to sequential approach outlined. Need to bring forward Area of Search sites earlier and a detailed trajectory of numbers and types will help to pinpoint this more accurately.	2689/8154	Monks Cross North Consortium
Paragraph 8.27 - 8.28	Should be clarified that approach to identifying future land for housing through Allocations DPD is in addition to major sites detailed within paragraph 8.9 of Core Strategy. This clarification should also be applied to paragraph 8.28, to emphasise that it should be possible, through Allocations DPD and in addition to major sites detailed within paragraph 8.9 of Core Strategy, to identify sufficient sites to meet future housing need.	214/7327 621/7373	Network Rail National Museum of Science & Industry
Paragraph 8.28	Contest need to identify sites at A and B and to therefore reduce Green Belt.	458/7584	York Green Party
	Include Area of Search D (South of Moor Lane, Woodthorpe) as a preferred area of search for an urban extension.	2542/8073	Moor Lane Consortium
	Monks Cross Site (Area A) has been promoted as a mixed-used scheme and should be amended to reflect approach taken by consortium in its promotion, which allows some employment land development to commence in early years.	2689/8155	Monks Cross North Consortium
The Preferred Approach - Housing Density, Mix & Type			
Paragraph 8.30	Housing Stock - More family housing needs to be built rather than flats. Should assess level of flats already built per ward and parish so apartments are not all concentrated in one area. Past overprovision of flats in areas such as Fulford should be taken into account and city wide numbers not used to assess whether more flats are appropriate. Student Housing - Studentification is a real problem. LDF must have appropriate guidelines in place to limit conversion of much needed family housing to multi occupancy housing. In some neighbourhoods guidelines of a maximum percentage of multi occupancy housing would help.	70/8207	Fulford Parish Council
	First sentence should be amended to provide sufficient flexibility with regard to timing, so it reads: - "Site specific density, mix and type targets will be established through the Allocations DPD and Area Action Plans, and through negotiations undertaken as and when planning applications are submitted , on a site-by-site basis".	214/7328 621/7374	Network Rail National Museum of Science & Industry

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach - Housing Density, Mix & Type continued			
Paragraph 8.30 - 8.31	Support proposal to make specific allocations for student housing through Allocations DPD and AAPs. However, should be provided in line with student numbers and to a large extent on campus. Purpose built student housing could be built off campus only if appropriate sites can be identified which do not impinge on local communities or facilities or detract from opportunities to provide affordable housing. Question suitability of SHMA 2007 as an acceptable part of evidence base. Produced before slump in housing market and too focussed on market demand as opposed to housing need. This part of the evidence base should be reviewed.	458/7585	York Green Party
Paragraph 8.30 - 8.33	It is unwise to prescribe densities. Better to assess what works and what is suitable on a site-by-site basis rather than applying a fixed density matrix as set out in Table 2.	165/7275	Home Builders Federation
Paragraph 8.31	Regard should be had to site-specific circumstances and context in assessing each development proposal. Results of 2007 SHMA reflect a single point in time and therefore will need to be subject to regular updating to reflect changing needs.	214/7329 621/7375	Network Rail National Museum of Science & Industry
	Support prioritisation of houses rather than flatted development.	2542/8074	Moor Lane Consortium
Figure 11	Note inclusion of British Sugar site as being within "suburban area", with net density target of 40 dwellings per hectare and support reference to type of residential development in area being 90-100% housing.	525/7520	Associated British Foods plc
	Broadly agree density approach taken but advise be used as a guide and not translated into policy.	2689/8156	Monks Cross North Consortium
Table 2	Objects to overall approach. Need for greater level of flexibility to be considered in regard to densities applied in city centre, urban, suburban and rural sub-markets. York is also experiencing over provision of apartments and under provision of housing. Recommends that density should be more flexibly applied, with indicative ranges, rather than minimum requirements for each sub market. Table should be amended as follows: - Sub-Market Net Density (Dwelling per hectare) City Centre 40 to 70 dph Urban 30 to 50 dph Suburban 30 to 40 dph Rural 20 to 40 dph	161/7246	Persimmon Homes (Yorkshire)
	Should refer to minimum net densities, and therefore should be amended. Also having regard to need for SHMA to be regularly updated, 60% target for houses (as opposed to flats) must also be subject to regular review, to be in line with updated SHMA evidence.	214/7330 621/7376	Network Rail National Museum of Science & Industry
	Density as set out should be more flexibly applied, with indicative ranges, rather than what appears to be minimum requirements for each sub market.	2517/7899	Lands Improvement

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach - Housing Density, Mix & Type continued			
Table 2 continued	Broadly agree density approach taken but advise be used as a guide and not translated into policy.	2689/8157	Monks Cross North Consortium
The Preferred Approach - Gypsy, Traveller & Showpersons Accommodation			
Paragraph 8.34	Approach does not entirely accord with circular 1/2006. That clearly states that local authorities must allocate sufficient sites for Gypsies and Travellers, in terms of number of pitches required by RSS, in site allocations DPDs. First sentence seems to suggest that needs potentially cannot be met through identified sites. Circular 1/2006 is clear that sufficient sites must be identified and applications arising from unexpected demand may occur and be judged against criteria developed. Council states it will identify sufficient sites for general housing and should similarly commit to finding land for accommodation for Gypsies and Travellers as required.	396/7487	Friends Families & Travellers
	Support general approach by meeting at least level of need identified in GTAA. Timescale for providing sites should be brought forward. Urgent need for more sites cannot wait until 2030.	458/7586	York Green Party
The Preferred Approach - Housing Special Needs Groups			
Paragraph 8.35	More specific provision should be made for growing elderly population through designation of more sites for bungalows and sheltered housing. Another group is people seeking co-housing opportunities. Co-housing began in 1970s and is now spreading rapidly.	458/7587	York Green Party
	Commend approach to addressing needs of older people through specific site allocations in Allocations DPD. Advise that given demographics and current existing need for older person's accommodation, will need to allocate sufficient sites in appropriate locations to meet need.	2692/8170	The Planning Bureau Limited
The Preferred Approach			
Strategic Objectives	Third objective should be added: - "To ensure that housing growth in York does not jeopardise achieving any of the other strategic objectives in the Plan."	458/7588	York Green Party
Targets	Latest available evidence in 'Overview of Gypsy and Traveller Accommodation Assessments - Yorkshire and the Humber Region, Final report for Yorkshire and the Humber Regional Assembly March 2009 (GTAA) states that Additional Residential Pitch Requirement for nine years is 102 pitches for York and that this equates to 77 pitches for years 1-5 and 41 pitches for years 6-10. 102 pitches apply to period 2007-2015. Using a conventional estimate of 3% compound increase then needs to 2030, a further 15 years, will be very much more. Currently 55 available pitches in York, which with increases, suggested by GTAA would be of the order of 157 authorised pitches in 2015 were all identified need to be met. A 3% growth rate applied to 157 over a further 15 years indicates a need for a total of 243 pitches by 2030 based on accepted family growth rates. Hence a target of 36 additional pitches by 2030 is unrealistic and understates real needs by a factor of at least 6. Target should include transit provision - 2 pitches are listed in GTAA.	396/7488	Friends Families & Travellers

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Targets continued	First bullet point: - Housing targets should be lower. Third bullet point: - Broadly support these targets for housing density. Also see comments in Question 8 (Ref 458/7593).	458/7589	York Green Party
	Target of 850 homes per year from 2026-2030, is too low. Fails to take into account any potential increase in requirement in IRS. Number is less than needed based on growth projections. Object to at least 60% of homes being delivered over plan period being housing. SHLAA and other parts of Core Strategy state a requirement of 70% houses.	2542/8075	Moor Lane Consortium
Policy CS5 - A	In accordance with RSS the Council should not be regarding dwelling requirements as "ceilings". Likely that household requirements informing IRS will increase, and there will be a need to plan for projections, over and above those set out in adopted RSS. Policy should be amended as follows: - "The Council, housing providers and services providers together will seek to achieve the completion, of <u>at least</u> the net additional dwellings required by the RSS, as follows.." 2nd paragraph should be amended as follows: - "Beyond the end date of the current RSS, and in order to create a Green Belt for York enduring until at least 2030, the Council, housing providers and service providers together will seek to achieve the completion <u>of at least the following net additional dwellings..</u> "	161/7247	Persimmon Homes (Yorkshire)
	Wording "seek to achieve" to net additional housing target seems half-hearted. Prefer to read stronger commitment to meeting requirement of residents. Object to setting of targets up to 2030 beyond life of current RSS. New targets will need to be set by regional plan, and cannot be pre-empted by Core Strategy. Target of 850 net additions per annum from 2026 to 2030 is unlikely to be adequate. Latest household projections indicate that in five-year period between 2026 and 2031 will be an increase of 7,000 households in York. Even discounting unmet demand from years 2006-2026, a target of 850 net additions per annum over five years would only produce 4250 units, some 2750 short of the projected increase. Premature and beyond authority of Council to seek to fix housing targets beyond life of RSS through Core Strategy when it is more likely that Strategy will need to be reviewed to take into account changes in household projections. Reference to Green Belt should also be removed from draft policy because review of residential locations within draft Green Belt and fixing of its boundary has still to be undertaken. However, agree that target should be rolled forward as an interim indicative target. Suggest that wording of policy should be changed to read: " <i>Beyond the end date of the current RSS, the Council, housing providers and service providers together will achieve the completion of the net additional dwellings as follows: 2026-2030 <u>at least</u> 850 dwellings per annum</i> ".	165/7277	Home Builders Federation

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS5 – A continued	Should be explicitly explained within policy that figures represent minimum targets rather than ceilings to housing delivery.	331/7476	Taylor Wimpey (UK) Ltd
	RSS figures should be targets for minimum provision not a cap. Approach in Table 1 is inappropriate for following reasons: - Provision should be considered from 2008 and earlier targets and deliveries disregarded; Between 2004 and 2008 delivery was, on average, 846 units per annum and gross target from 2008 is 880 units per annum. Apparent that existing pipeline of permissions needs to be maintained throughout Plan period to achieve that level of delivery; Requirement to provide net additions of 850 houses per annum from 2008 should not treat existing permissions as contributing towards provision, as pipeline will be required both at end and beginning to achieve rate of delivery; Calculation of plan provision in respect of houses should on basis of 70% of site area being developable and that such areas would deliver levels of 40 dwellings per hectare in urban areas, and 35 in suburban areas. This would ensure proper provision of amenity and outdoor play space and also adequate land provision to achieve targets.	606/7762 610/7785	Jennifer Hubbard Mr G E Wright
	Acknowledge phased approach taken to delivery of housing to meet local needs and spatial approach to density. Support for fact that although an indication of types of densities likely to be accommodated is provided, a definitive approach to densities will be devised on a site-by-site basis paying particular attention to character of particular sites.	607/7776	CEMEX
	Should not regard dwelling requirements as ceilings. Policy should be amended by inserting after “completion of” – “ at least the ”. Also recommend 2nd paragraph be amended by inserting after “completion of “ – “ at least the following ”.	2517/7900	Lands Improvement
	Object to 850 homes per year from 2026-2030, as too low based on SHMA and growth projections. Setting this growth level fails to take into account any potential increase in requirement in IRS.	2542/8076	Moor Lane Consortium
	Agree approach in extending RSS levels beyond 2026 to 2030 to provide for a longer-term Green Belt boundary.	2689/8158	Monks Cross North Consortium
	Object as seeks to extend plan period beyond that provided for in RSS. Green Belt should endure unaltered beyond plan period and to do this need to identify safeguarded land.	2696/8188	Thomlinsons Solicitors of Wetherby
Policy CS5 - B	Supports acknowledgment that Sub Regional City of York will require an expansion to accommodate projected housing needs.	161/7248	Persimmon Homes (Yorkshire)
	Clarify first sentence to read: - “The Council will identify future housing sites in addition to those major sites listed within paragraph 8.9 of the Core Strategy through the Allocations DPD...”	214/7331 621/7377	Network Rail National Museum of Science & Industry

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS5 – B continued	Approach relates back to settlement hierarchy, which, in principle is acceptable, though should not follow rigid sequential approach of PPG3. In addition, presumptions are made regarding deliverability of major strategic sites, notably York Northwest. This has not been suitably tested through SHLAA in terms of its likely deliverability and timescales for completions.	331/7477	Taylor Wimpey (UK) Ltd
	ii) Wording after 'provided that ...' should be strengthened. If a site is shown to be unsustainable according to other criteria in this Plan, then satisfying Settlement Hierarchy should not carry weight. iii) Don't support this.	458/7590	York Green Party
	Note and support criterion (ii), in particular reference to delivery of major housing development through realising full potential of York Northwest area to help meet future housing needs.	525/7521	Associated British Foods plc
	The sites identified at (iii) should be treated with caution. In particular: - As a result of called-in Inquiry Monks Cross North should not be a mixed site but one of limited housing provision, incorporating substantial elements of landscaping. Allocated land area should not extend out to outer ring road, as this land is important in preserving distant views of city from ring road and underpins one of essential purposes of Green Belt; Land east of Metcalfe Lane is of nature conservation interest. Inappropriate to consider any departure from RSS figures, which should be treated as a minimum. Inappropriate to consider windfalls. In light of approach to estimation of residual needs for housing provision, further sites need to be identified and inner Green Belt boundary needs to accommodate these. In view of above provision requires detailed recalculation. Overall shortfall for housing (as opposed to flats), is likely to be of order of 12,000 not 6,600 as stated.	606/7763 610/7786	Jennifer Hubbard Mr G E Wright
	Additional comments to above: - Metcalfe Lane site is unsuitable for housing, as important bio-diversity provision on site, which was identified within Derwenthorpe considerations, and during Derwenthorpe Inquiry. Provisions likely to be delivered from York Northwest should be significantly discounted or disregarded.	610/7786	Mr G E Wright
	Supports acknowledgment that Sub Regional City of York will require an expansion to accommodate its projected housing needs. However, objects to site on land adjacent to A1079, Grimston Bar being unreasonably dismissed. (See representation for detailed supporting information on site).	2517/7901	Lands Improvement
	Support approach to identify future housing sites through prioritising previous developed land and buildings within York.	2540/8038	National Grid Property

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS5 – B continued	(iii) Land South of Moor Lane, Woodthorpe, should be first location for expansion of Sub Regional City of York. (See representation for detailed site-specific reasoning). Should be reworded to "Finally the expansion of the Sub Regional City of York (the main urban area) firstly to land to the South of Moor Lane, Woodthorpe, secondly to Monks Cross, Huntington and finally to the East of Metcalfe Lane (as illustrated on the Key Diagram). "	2542/8077	Moor Lane Consortium
	(iii) Objected to as prioritises potential release of Area of Search A over B. Not role of Core Strategy to define preferred sequencing of release of sites for potential development. This should be considered within Allocations DPD.	2685/8112	Mr F R Pulleyn
	Monks Cross should not have a higher priority than Land East of Metcalfe Lane. First preference should be for Land East of Metcalfe Road.	2687/8119	Tangent Properties
	Object as it implies a sequential approach to allocating land that does not conform to Core Approach policies of RSS.	2689/8159	Monks Cross North Consortium
	Needs to reflect SP1 and refer to appropriate small-scale expansion to Large Villages and Local Service Centres.	2696/8189	Thomlinsons Solicitors of Wetherby
	Supporting commentary should be amended and specific reference to Monks Cross and East of Metcalfe Lane removed. Should be replaced with more general wording relating to need to release and safeguard Greenfield land within current interim Green Belt.	2698/8238	Commercial Estates Group and Hallam Land Management
Policy CS5 - C	Objects specifically to reference to "minimum" net housing densities being achieved in sub market areas. Need for flexibility to take into account site specifics. May be instances where density requirements cannot be achieved. Also need to consider that 90% of dwellings will be houses, rather than flats. Given that a number of major sites being promoted, especially within York Northwest are within "City Centre", does this mean that Council will only be seeking to deliver flats on these sites. City Centre and York Northwest site capacities require recalculation. Over provision of flats is contrary to PPS3. Reference to "minimum requirements" is also contrary to second paragraph of Policy CS5 (C). Reference to density requirements should be deleted from Policy.	161/7249	Persimmon Homes (Yorkshire)
	Identification of sites should also be in addition to those major sites listed within paragraph 8.9 of Core Strategy. Should include additional text within second paragraph to provide an essential element of flexibility, to include reference to ability of innovative design to respond to identified need for larger accommodation.	214/7332 621/7378	Network Rail National Museum of Science & Industry
	Broadly support targets for housing density. Also see comments in Question 8 (Ref 458/7593).	458/7591	York Green Party
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations. Minimum net housing densities should be cross-referenced with Table 2.	525/7522	Associated British Foods plc

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS5 – C continued	Completely overstated. Assessment should have regard to fact that a maximum 70% of an allocated site is likely to be developed, so as to provide outdoor play space, amenity space and landscaping. Densities in urban areas at 50 dwellings per hectare are too high to provide family housing and a figure of 40 dwellings per hectare for developed areas should be provided. This means, for every 28 housing units, a hectare of land needs to be allocated.	606/7764 610/7787	Jennifer Hubbard Mr G E Wright
	Objects to reference to “minimum” net housing densities being achieved in sub market areas. Needs to be flexibility to take into account site specifics. There may be instances that density requirements cannot be achieved. Need to consider that 70% of dwellings will be houses, rather than flats. Given that a number of major sites being promoted, especially in Northwest AAP, are within “City Centre”, does this mean that Council will only be seeking to deliver flats on these sites? If so, contrary to PPS3. Reference to minimum requirements is also contrary to second paragraph of Policy. Reference to density requirements should be deleted.	2517/7902	Lands Improvement
	Determining minimum net housing densities on a sliding scale in relation to context to City Centre, conflicts with aspirations of PPS3. Approach provides no scope to appreciate characteristics of local area, other than that of context to city centre. Approach suggested could restrict deliverability of high quality well designed housing in certain areas. Policy needs to offer some flexibility, rather than a blanket density setting of 50dph in urban area, to enable developers to achieve objectives of PPS3 in achieving high quality design. Policy also highlights desire for an overall mix of 70% houses to 30% flats in order to create a better balance across York’s housing market. Whilst generally support emphasis on delivery of houses rather than flats, seek clarification with regard to this figure when put in context of 4 th bullet point of Targets which asks that at least 60% of homes delivered over plan period be houses rather than flats. Would also like to see a degree of flexibility in Core Strategy, given its 20-year life span, to allow a shift away from such a target if market changes and a need for more flatted accommodation emerges.	2540/8039	National Grid Property
	Support that overall mix of 70% houses and 30% flats will need to be achieved. Support net housing densities as net minimums.	2542/8078	Moor Lane Consortium
	Continue to rely too heavily on construction of flatted development to meet housing requirement even though this source of housing is now financially unviable and identified housing need is for family accommodation.	2696/8190	Thomlinsons Solicitors of Wetherby
	In Figure 11 Haxby is shown as a “suburban area” and in settlement hierarchy terms is classified as a Local Service Centre. However, other Local Service Centres such as Strensall /Towthorpe and Upper and Nether Poppleton are shown as “rural villages” in density terms. Approach is inconsistent. Same densities should apply to all settlements of same category.	2698/8239	Commercial Estates Group and Hallam Land Management

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS6	Scale of need indicates may be necessary to allocate site(s) rather than rely on planning applications. Could be in Allocations DPD or, depending upon urgency of need, could give consideration to strategic site in core strategy.	1/7099	Government Office Yorkshire & Humber
	Policy should commit to delivering, at a minimum, number of pitches, residential and transit, required by RSS. Criteria 1,2,4 and 6 are generally acceptable but 3 and 5 are unduly restrictive. Criterion 3 seems to be going beyond government guidance. While requiring transit sites to be located on highway network may make some sense, clear that as places suitable for mainstream housing are suitable for Gypsy and Traveller sites then requirement of being well located on highway network is superfluous. Criterion should read instead "transit sites should be well located on the highway network" . Criterion 5 can be interpreted so that almost any application for a site could be refused on grounds of amenity. All developments can be held to be detrimental to amenity; it is balance of harm against benefits of development that matter. Circular 1/2006 is clear that criteria should be fair, reasonable realistic and effective. Criterion should be amended in line with this. Policy states that where specific sites cannot be identified that applications will be tested against this policy. Does not seem to recognise that Council may well receive unexpected applications from time to time, which should be measured against policy criteria. Policy should be amended to reflect this as required in 1/2006, which states that criteria will also be used to meet unexpected demand.	396/7489	Friends Families & Travellers
	Support provision of sites but would like to see interim targets to encourage site provision earlier in Plan Period.	458/7592	York Green Party
Question 8			
	Housing Distribution and Growth PPS3 makes it very clear that windfalls cannot be included in the first 10 years unless the authority can provide robust evidence of genuine local circumstances that prevent specific sites being identified. Even in years 11 to 15, if it is not possible to identify sites, PPS3 requires the identification of broad locations for future growth. Will need to be a very strong argument that York cannot develop urban extensions before windfall can be considered acceptable. Should also be made clear in making decisions on future land needs that boundaries of the 'draft' Green Belt have no statutory planning status, since detailed inner Green Belt boundaries have never been designated in an adopted development plan. Defining permanent Green Belt boundaries for the first time is an important role of LDF. To do so need to make assumptions in relation to safeguarding sufficient land for potential development needs beyond land required for 15 year plan period before drawing permanent Green Belt boundaries.	1/7100	Government Office

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	Housing Density, Mix and Type Acceptance of higher densities raises concerns about quality of place; if densities are too high it could either lead to accommodation not meeting needs or inadequate green space etc. Also still likely to be need for safeguarded land between urban area and Green Belt to meet policy requirements of PPG2. Also no mention of student housing despite acknowledgement of York's importance as a university city.	1/7100 continued	Government Office continued
	b) We would welcome a discussion on the need for the Core Strategy to explore the impacts of higher than RSS housing targets, particularly in the context of drawing a green belt that needs to endure. PPS12 and PPS3 note the need for plans to take account of such rises that may result in household change. We can provide you with the results of evidence work that was undertaken for the RSS Update that started to explore the issues of planning for additional growth in the region. c) It would also be worth discussing the use of windfalls. The question "if we were able to use windfalls" implies that you cannot. The Core Strategy needs to set out how windfall sites can be part of York's solution to housing growth and land supply by providing flexibility/headroom to deal with the possibility of higher housing numbers.	2/	Local Government Yorkshire & the Humber
	b) No view on numbers of houses required, however, important to assess capacity of sites to incorporate suitable levels of green infrastructure to serve the population and to meet standards such as ANGSt. Need to ensure sites are served by sustainable transport. LDF policy and allocations should ensure that green infrastructure and sustainable transport options are incorporated into all major development and regeneration schemes from the outset. Important for housing development to be informed by: - Green Belt review, thorough assessment of environmental capacity of area, landscape character assessment. Notes that York's Landscape Appraisal, undertaken by ECUS, is an assessment that was undertaken in 1996. Significant changes in the landscape and new forces for change and recommendations for action are likely to exist. Therefore urge review of existing Landscape Appraisal. e) No view on density levels, however important that creation and long-term maintenance of extensive green infrastructure should be planned for alongside housing.	4/7128	Natural England

	Housing growth - measures to ensure early definition of Green Belt are to be welcomed. However, RSS is being reviewed and current work on IRS suggests that housing growth figures for the region will need to rise. Need to be aware this may have implications for amount of land to be excluded from Green Belt. Windfall sites - current Government guidance does not support this. Significant issue for all authorities in North Yorkshire where windfall sites traditionally represent a major element of new housing growth. Should be appropriate to include realistic assessments of potential windfall sites in allocation process. Excluding them can result in significant over-allocation of land, which can distort overall strategy. Supports proposal to take account of windfall sites.	18/7173	North Yorkshire County Council
	Grange Site may become surplus to requirements in medium term and is identified within SHLAA as potential housing opportunity. Support consideration of housing needs up to 2026 and agree with annual requirements of RSS. Not appropriate to rely on windfall opportunities. Certainty of supply needs to be created through allocation of deliverable sites up to 5 years and continuous trajectory of housing land identified up to 15 years. Priority should be given to sites close to community facilities and accessible to public transport.	45/7179	York St John University

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	Greenfield sites may be suitable where meet sustainability criteria. Should be recognised that student housing does not form part of housing land supply and separate provision needs to be made in the strategy. Consultation with HE Institutions should be held to establish need. Should be acknowledged that these are likely to be high density developments within urban area of city. Because of scale, nature and importance of student population consideration needs to be given to student housing in this section.	45/7179 continued	York St John University continued
	a) See initial comment under general (49/7181) in relation to targets for housing and employment land. Concerned that targets may be too high and lead to overdevelopment. Realistic inclusion of windfall sites could also protect green belt land from development. e) and f) If developments in York are to be at higher densities and with high proportions of flats to houses there will be a great need for extra public open space within developments and wildlife friendly measures in buildings such as green roofs and walls. There are already long waiting lists for allotments in York and new developments should therefore contribute towards the provision of new allotment sites. Residents of flats may have particular needs for access to green space and to have allotments.	49/7189	Yorkshire Wildlife Trust

	a) Role should be maintained as a Sub-Regional City in IRS. Most up to date household projections should be used for taking forward future regional housing requirements. Allowances for windfalls should not be included in first 10 years of supply unless can provide evidence that genuine local circumstances prevent specific sites being identified as per PPS3 PPS11 sets out that time horizon should be at least 15 years from date of adoption. b) Should be providing at least 850 homes per year up to 2030. 2008 household projections are likely to increase requirement for housing and in this respect should be planning at least for this scenario now. c) Strongly objects with this approach, especially if considering including windfalls in first 10 years of plan. Contrary to PPS3. Council has not provided any indication of genuine local circumstances to warrant inclusion of windfall in housing land supply. e) Objects to this approach as need to ensure right type of house is supplied in right location, rather than an overarching and restrictive policy. Puts considerable pressure on local community, services and amenities. f) Objects to "assumption" at this stage. Up to date evidence suggests two thirds of demand is for houses. Flats are one form of a smaller property. Has Council considered other forms of smaller units, such as one/two bedroom houses? Largest growth in smaller households is for older persons who already occupy family housing. Incorrect and simplistic to automatically assume that the needs of smaller households can be satisfied with smaller dwellings.	161/7244	Persimmon Homes (Yorkshire)

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	Supports emphasis for developing in a sustainable manner, whilst also meeting needs of an evolving population. Means needing to ensure emerging plan is flexible enough to accommodate changes in, for example, population and household formation. Previous over-reliance on inappropriate apartment development now supports need for Green Belt land release. Needs to occur early in plan period to ensure a rolling five-year supply of deliverable housing land providing homes that people require. Supports need to deliver (at least) 90% of new residential development as houses to rebalance recent over provision of flats. However need to ensure emerging plan and strategy is flexible enough to adapt to changing circumstances and updates in evidence. g) Should ensure meets needs of emerging population throughout plan period, rather than making assumptions at this stage, which may change over time. Should therefore be flexible to deal with a variety of changing circumstances. h) Policy CS5 (c) does include a minimum net housing density. There is a need for flexibility and ensuring development coming forward meets market demand, rather than what Council would seek to impose.	161/7244 continued	Persimmon Homes (Yorkshire) continued

	a/b) LPA must plan to deliver housing requirements set out in RSS as a minimum. Also considers that beyond 2026, should continue to plan to build an additional 850 homes per year (net) as a minimum, until a different requirement figure is provided through updates to RSS or production of its successor document, the IRS. In planning for new housing, consideration must be given to need for Core Strategies to be flexible to allow for changing circumstances. Latest advice indicates that total annual housing requirement for Yorkshire and the Humber is likely to increase by 11%. b) Current recession does not justify planning for a lower level of housing than that required through RSS. Policy framework should help facilitate development and deliver new housing in order to meet requirements. a)/c) Does not support inclusion of windfall allowance generally, nor based on previous completion rates from windfalls, for the period 2025 - 2030. Not appropriate to apply a windfall allowance at a stage when draft SHLAA has not been subject to consultation and is incomplete. Furthermore, draft SHLAA identifies land within draft Green Belt that is considered suitable for housing development and could potentially be allocated for housing following a proactive policy framework and setting of realistic Green Belt boundaries. Thus able to plan for delivery of housing requirements, without using windfall allowance. d) Proposed approach for identifying land for housing development and guiding future housing allocations is broadly consistent with RSS and is generally supported.	164/7260	Hogg Builders (York) Ltd

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	e)/f) Concerns about suitability and deliverability of density levels referred to in Table 2. Strong concerns about suggested density levels, as, for all but rural areas, they require apartment development. The market for apartments is currently extremely weak. No evidence to suggest that this will revive in near future. No market for apartment development in urban/suburban locations. On this basis, proposed density levels are unrealistically high. Effect of this is that predicted housing land requirements are unrealistically low. Question how effectively the assumed split will redress current imbalance in city's overall housing market. Not helpful to apply unrealistic density policies in considering development proposals. Likely to undermine delivery of housing development and prejudice prospects of housing requirements being met. Supports application of a minimum density of 30 dph. However, in exceptional circumstances, densities of less than 30dph might be appropriate e.g. where a built density of 30dph or more would be harmful to the character of a conservation area.	164/7260 continued	Hogg Builders (York) Ltd continued

	b) Market will decide. Developers and not Council build homes. At present time falling woefully short of these figures and will continue to do so for many years. c) No d) Yes e) Short densities should not increase. f) Market will decide, although clear that housing is what is actually required and not flats. g) Market will decide. h) Policy should be flexible.	198/7285	The Helmsley Group
	a) No comment – York is in many ways directed by central government in these areas. b) Agree with numbers subject to economy recovering. c) Statements are contradictory windfalls are linked to industrial commercial shrinkage so unless jobs are available there is no need to build new houses as market for same will be reducing due to basic economics (affordability). d) Agree with statement. e) Yes provided proposals don't include flats. Consideration should be given to incorporate cellars (not withstanding flood area issues)/ roof spaces as is case in other European countries. f) Agree with approach. g) Level should stay at 30% or less. Risk that multi – occupancy properties could default to being owned by local authority in future. i) Agree with proposals. j) No - the same assessment should be used for each.	218/7402	Northern Gas Networks

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			

	a) At RSS EiP, role that York ought to play in Region took little account of capacity of City to accommodate further growth. Evidence from work which Council needs to undertake in order to establish how much change historic environment of City might be able to accommodate (suggested in response to Question 7) should be used to appraise role which York should be playing in Region in longer term and Policy measures that might be necessary to deliver scales of housing and employment growth envisaged whilst protecting those elements which contribute towards special character of the City. b) Levels of growth are based upon those set out in RSS. Paragraph 8.4 notes that figures given for period beyond 2026 is less than number of homes needed based upon population projections for City. Is scale of provision realistic? If not, concerned that, by 2030, could be a shortfall in housing provision, which may mean looking to amend Green Belt boundaries at that time - which does not give degree of permanence envisaged in national policy guidance. c) If plan does include windfalls, might mean there would not be a need to identify (at this stage in the process) sites on periphery of built-up area to meet longer-term development needs. However, if areas currently being put forward as potential Areas of Search do not perform any of functions of Green Belt as set out in PPG2 then, by implication, they should not be included within Green Belt. Consequently, question of whether or not to include windfalls is academic since Areas of Search are likely to be excluded from Green Belt anyway. e) Support approach to density levels. Whilst might be helpful to set indicative densities for various sub-market areas, to safeguard character of this important city, essential that actual densities are established on a site-by-site basis. May well be parts of City where higher densities may be appropriate. Greater understanding about what elements contribute to special character and setting of City would help to identify where such areas might be located and scale of housing which might be successfully delivered. f) SHMA findings underline need for an understanding of capacity of York to accommodate further development. If more housing is to be provided as family houses, what does this mean in terms of likely land take over next twenty years? Is City able to accommodate this level of growth without harm to its character? At moment, many of decisions affecting City are being made with no assessment of what they will mean for its character.	242/7430	English Heritage

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	a-d) Notwithstanding issues raised in response to SP3 (Ref 331/7473), there are also issues in relation to prioritisation of sites for development under this approach. Would potentially result in more suitable sites adjacent to main urban area being unallocated with preference for development within smaller settlements which would offer a smaller range of services and accessibility resulting potentially in increased journey times and frequency. National approach seeks to look at such matters as suitability, achievability and deliverability rather than more rigid sequential approach of PPG3. Preferred approach does not accord fully with national policy agenda whilst again no indication given as to how issue of viability and deliverability has been taken into account in determining such an approach. Reference is made to 'emerging' SHLAA, which will identify and review potential sites for housing development against national policy criteria, including suitability, availability and deliverability of sites within plan period. Council's assumptions are premature and not supported by a robust evidence base if they are to suggest that there are sufficient sites to accommodate housing development within period up to at least 2021 without need for urban extensions or other sites. At this stage conclusions and assumptions within SHLAA have not been subject to scrutiny and cannot therefore be considered as part of justification for such an approach or, in turn, for approach to Green Belt which will necessarily be affected. In addition, Council has also made assumptions regarding potential for windfall sites to come forward within first ten years. This is contrary to PPS3 and no evidence of local circumstances, which would justify such assumptions. e-j) Presumptions of housing density based on permissions from recent, pre-credit crunch housing markets are flawed given that market has altered significantly and is not expected to recover to 2007 levels for a number of years. In addition to house prices, approach from house builders in terms of mix has also altered, with a shift away from high levels of apartment development towards greater numbers of family housing and starter homes. As a consequence, densities are highly unlikely to return to levels seen in 2007 whilst land values paid for sites in 2007 are no longer viable for type of housing development which housebuilders are able to deliver in current climate. This needs to be considered in much greater detail with input from major housebuilders to understand implications as a policy based on these densities is seriously flawed and will likely result in significant shortfall in meeting housing target set through RSS. This has a knock-on effect on spatial principles and approach to Green Belt. Should it be clear that additional land will be required to meet these targets, current assumption that no further land will be required from Green Belt until towards end of plan period again becomes flawed.	331/7475	Taylor Wimpey (UK) Ltd

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	a) The Role of York Should not be seen as being an economic driver for sub-region. Has a primary responsibility, to make best possible provision for future quality of life of its own citizens. Primary role should be to build on its past as a small historic city and to face a future of global uncertainty, resource depletion, rising energy prices and climate change, by planning to reduce its own contribution to global warming, building a resilient local economy, planning to live within its own capacity and to maintain a good quality of life for its citizens. Regional Housing Requirements /Housing Growth Contest notion that targets for growth should be as high as level suggested by RSS. Current targets contradict aspirations to 'strike a healthy balance between physical growth and environmental sustainability'; to reduce the city's eco-footprint; and to reduce city's carbon footprint. Ignore impact on local infrastructure, resources and quality of life that will result from increasing city's population by around 25%. At the same time, document fails to make clear what advantage of this excessive growth is supposed to be for people of York. When setting appropriate housing target levels, following factors should be taken into account: ▪ Capacity of known deliverable brownfield sites (without consent up to 2008); ▪ Allowance for windfalls throughout plan period (or at least from 2015) based on local knowledge and experience; ▪ Housing needs as identified primarily through housing waiting list; ▪ Constraints set by other local and national policies such as Climate Change Act and York's own Climate Change Strategy; ▪ Impact of such levels of development on local infrastructure and resources and capacity of city to deal with this whilst reducing its carbon footprint, retaining its quality of life and protecting its historic heritage; ▪ More realistic assessment of future population increases and employment targets, taking into account current recession, certainty of rising fuel prices during the plan period and needs of York's economy as opposed to pursuit of growth for growth's sake; ▪ Towards end of plan period it is likely that more land may become unavailable due to increased flood risk; ▪ That by the end of plan period rising fuel prices will have made imperative to grow local food even greater and agricultural land increasingly valuable as agricultural land. Brownfield sites available are quite capable of catering for York's needs and a figure should be set which falls within their capacity and taking into account criteria above.	458/7593	York Green Party

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	The Duration of LDF documents Support idea of planning ahead and a permanent Green Belt that hasn't to be continually revisited. However, unsure of value of extending Plan beyond 2026 as main outcome seems to be need to identify Green Belt land for possible housing development when housing needs at that time are unknown. Would be better in that context to keep LDF concurrent with RSS. b) Should build far less than 850/year throughout plan period. c) Yes. Council should be able to include a higher number of windfalls in Plan. Allowance should be earlier rather than later in Plan period. d) No. Contest need to identify sites at A and B and remove them from Green Belt. Lower housing targets would remove need for sites and a Capacity Study would establish certainty regarding maximum level of development York can sustain. Do not accept argument that this approach provides 'flexibility' for future. York needs flexibility to respond to threats and challenges of an uncertain global environment. At present housing and employment numbers effectively define rest of policies in LDF. If citizens of York cannot influence at what level these should be set then whole consultation is a sham. Setting these aside is effectively an opening for developers to chose them at any time in plan period in preference to more sustainable brownfield and harder to develop Greenfield sites. The sites together offer more than number of hectares needed. Target figure of 135h already accounts for open space and community facilities, so even more land is being taken out of Green Belt than projected we might need. e) Generally support proposed minimum density levels in targets. Surprised that proposal for maximum density level in city centre seems to have completely disappeared. Sympathised with objective in Issues & Options to achieve benefits of less dense development in city centre compared to 190dph over housing boom year and would support some kind of maximum 'benchmark figure' around 80 – 100 dph. Maximum levels should be benchmarks rather than absolute limits, to be weighed against quality of design and environmental sustainability offered by a proposed development. It is not density per se that matters but outcomes of a particular type of building. Higher densities than above should be accepted and indeed encouraged in all areas where proposals include high quality ecological design enabling developments incorporating open space, gardens, family dwellings and high quality architecture. Better design enables higher density. Whatever levels these are set at, 'liveability' and impact will be much improved if existing open space requirements are strengthened so that appropriate open space has to be provided either on-site or within 1-200 metres of development. Generally building in city centre should aim to be relatively low rise and should avoid gated communities, which diminish community and vitality in city centre.	458/7593 continued	York Green Party continued

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	a) Support bringing British Sugar site forward for predominantly residential development. d) Support identification of British Sugar site as a major residential development opportunity, although do not consider a general policy approach to redevelopment of York Northwest is appropriate. Development framework should be formulated as part of AAP. e) Masterplanning of British Sugar site should allow for density levels to be increased based upon site-specific considerations, which will be established as part of ongoing due diligence exercises, such as ground condition assessments. f) Consider British Sugar site is most suited to a predominantly housing-based development. g) Mix of properties should respond to market demand at end of plan period. h) Support approach. British Sugar site should be determined through AAP.	525/7523	Associated British Foods plc
	a) No justification for question. Is attempt to canvass support for a submission to IRS to reduce level of growth for City, rather than dealing solely with adopted RSS and strategic requirements for development which it sets out. b) Level of growth is set at 850 dpa and must plan for this to comply with RSS. Question seeks to make reference to current recession, which only serves to place greater challenges to delivery and means City must be more proactive in identifying additional unconstrained land in short term. Requirement is an annual level and is important that rates of delivery are maintained throughout plan period. Allocation of a larger number of smaller and medium sized sites could assist this. Beyond 2026, through to 2030, there is an absence of strategic direction. As population projections and household growth are already significantly higher than planned for, unlikely, that level of growth set at 850 will be any less. c) See comments to paragraph 8.6 (Ref 546/7702 & Ref 2510/7874). Question is unfairly loaded and seeks to simplify inclusion of windfalls as an alternative to expansion of City. e) Over prescriptive. A more general policy seeking to make efficient use of land within urban area would be sufficient. Question over simplifies suggestion that increasing density could significantly reduce need for expansion of City. Whilst will play a part, forced over development will provide for poor development and harm intrinsic quality of City. f) Support plan in need to provide for a significantly greater proportion of family housing, which is urgently needed. g) Concerned that Core Strategy again looks to urban flatted development to make significant contributions later in plan period. Given extensive supply, have reservations that apartment market will recover sufficiently to warrant such a shift back in housing type provision. In absence of any evidence, Core Strategy should not include such a policy return.	546/7706 2510/7877	Miller Homes Ltd Taylor Wimpey UK Ltd

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	Housing Distribution and Growth 850 figure is not considered to be sufficient to meet required housing allocation target and should not include 'windfall sites' as a way of reducing deficit. Inclusion of windfall sites puts Core Strategy at risk of being found unsound. Housing Density, Mix and Type Density should not be increased as could potentially affect visual impact on setting. No demand for flats therefore should respond by providing more houses. This should be reflected during entire plan period. Flats could potentially be out of character for certain areas of York. Draft Green Belt doesn't follow identified area within RSS and incorporates land within outer ring road, which would normally be seen as prime development land.	568/7713	The Land and Development Practice
	In considering potential sites for housing development essential that environmental issues such as noise, light, odour, dust, air quality and contaminated land, are considered and assessed prior to sites being allocated.	2291/7823	CYC Environmental Protection Unit
	York North West, Hungate, Nestle, Germany Beck, Derwenthorpe, Terry's, Monks Cross and Metcalfe Lane are considered to have a significant impact on SRN. Further consideration of these sites should take into account following statement: - "A development of this size and in this location would have a significant impact on the Strategic Road Network, which would require mitigation. Improvements to the SRN are considered only as a last resort. Instead a range of sustainable transport options for people using the development needs to be developed through the use of travel plans." Would like to be involved in future analysis of clusters of potential sites to ensure that potential cumulative impact of sites is fully analysed at later stages.	2434/7847	Highways Agency
	a) The Role of York - should be maintained as a Sub-Regional City in IRS. Regional Housing Requirements/Housing Growth - most up to date household projections are used for taking forward future regional housing requirements. The Inclusion of Windfalls - should not be included in first 10 years of supply unless can provide evidence that local circumstances prevent specific sites being identified. The Duration of LDF Documents - PPS11 sets out that time horizon of core strategy should be at least 15 years from date of adoption. b) Should be providing at least 850 homes per year up to 2030. Also believes that 2008 household projections are likely to increase requirement for housing and Council should be planning at least for this scenario now. c) Strongly objects with approach, especially if considering including windfalls in first 10 years of plan. This is contrary to PPS3.	2517/7903	Lands Improvement

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	e) Objects to approach. Need to ensure right type of house is supplied in right location, rather than an overarching and restrictive policy being applied to every case. f) Objects to “assumption” at this stage. Up to date evidence suggests that two thirds of demand is for houses. Supports emphasis on developing in sustainable manner, whilst meeting needs of evolving population. Means ensuring plan is flexible enough to accommodate changes in population, household formulation and need for Green Belt land release, potentially early in plan period to ensure there is a rolling 5 year supply of deliverable housing land. Supports need to deliver at least 70% of new residential development as houses. Strategy needs to be flexible enough to adapt to changing circumstances and updates in evidence. g) Should ensure meets needs of emerging population throughout plan period, rather than making assumptions at this stage, which may change over time. Core Strategy should be flexible to deal with a variety of changing circumstances. h) Policy CS5 (c) does include a minimum net housing density. There is a need for flexibility and ensuring development coming forward meets market demand.	2517/7903 continued	Lands Improvement continued
	a) Acknowledgement that York should meet at least its regional housing requirement is welcomed. In terms of identifying land for housing, less reliance should, be placed on windfall as a source of housing supply. SHLAA will identify majority of housing sites in City. The more significant windfalls, primarily former employment sites close to city centre, have been developed and this source of supply is likely to deliver a decreasing supply in coming years. b) Should plan to meet at least RSS requirement up to 2026. Until RSS is updated, would be prudent to continue to plan for this number of houses in period 2026 to 2030. c) PPS3 is clear that windfalls should be excluded particularly in early years of LDF. Use of windfalls introduces uncertainty into deliverability of housing supply and most sites will be identified in SHLAA. Should a site come forward, its suitability would be assessed against policies of LDF and if it met criteria and was more suitable than allocated sites, then it could be developed and allocated sites re-phased. If Green Belt boundaries are drawn correctly and sufficient land identified for development, will be no need to develop in Green Belt. e) to h) Pursuit of higher densities has led to proliferation of apartment schemes in City and contributed to undersupply of family housing. Density should be applied flexibly so that right balance is struck between maximising use of land, meeting housing needs and responding to character of surrounding area. Increasing number of elderly households is likely to lead to an increase in demand for smaller properties, but not in every case. Size of unit occupied by a household is dictated primarily by income. If elderly households of future have relatively higher incomes than now, this could lead to a demand for bigger homes.	2523/7918	Grantside Ltd

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	a/b) Must plan to deliver housing requirements set out in RSS. Beyond 2026 should continue to plan to build an additional 850 homes per year as a minimum, until a different figure is provided through updates to RSS or production of IRS. Current recession does not justify planning for a lower level of housing than that required through RSS. Instead, policy framework should help facilitate development and deliver new housing to meet requirements. a/c) Does not support inclusion of a windfall allowance. PPS3 only allows for inclusion of windfall allowances in exceptional circumstances. Not appropriate to apply a windfall allowance at a stage when draft SHLAA has not been subject to consultation and is incomplete. Furthermore, draft SHLAA identifies land within draft Green Belt that is considered suitable for housing development and could potentially be allocated following a proactive policy framework within Core Strategy and setting of realistic Green Belt boundaries. As such, LPA is able to plan for delivery of housing requirements without using a windfall allowance. d) Approach broadly consistent with RSS and is generally supported. e/f) Concerns about suitability and deliverability of density levels referred to in Table 2. Strong concerns about suggested density levels, as, for all but rural areas, they require apartment development. Market for this is currently extremely weak and no evidence to suggest will revive in near future. In particular, there is no market for apartment development in urban/suburban locations. On this basis, proposed density levels are unrealistically high. Effect of this is that predicted housing land requirements are unrealistically low. As a broad matter of principle, supports application of a minimum density of 30 dph, in accordance with national guidance in PPS3.	2524/7932	Barratt Homes (York) Ltd
	a) Noted Council's submitted comments to 2009 Update, which will form basis of IRS. Suggest Council has been unduly negative to opportunities presented by this. Council should be more positive and offer support for region's housing requirement to be uplifted in line with latest recommendations of National Housing and Planning Advice Unit (NHPAU). Should also provide support for uplift in York's housing requirement to reflect new regional target and role as a city of sub-regional significance and centre for economic growth. Should state that in line with PPS3 and PPS12 guidance, windfalls have no place when identifying housing land supply and that there is a need for a sustainable and permanent Green Belt boundary to be set. Should also make clear that LDF documents will be in conformity with IRS plan period and that following its adoption, Core Strategy and subsequent DPDs will reflect its requirements.	2527/7948 2528/7972 2537/7996 2688/8020	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	b) Fundamental for Core Strategy to be in broad conformity with RSS and for minimum requirements to be delivered. Approach is not consistent with RSS, which set level of 850 dwellings per annum as a minimum. This should be reflected in wording of policy. Support thinking and approach of accepting need to extrapolate RSS requirements forward for five years for period up to 2031. Council must plan for possibility of more housing land being needed over plan period and look beyond minimum housing obligations set by RSS. LDF is required to identify sufficient land to ensure housing requirements are met for at least 20 years (indeed even longer bearing in mind the need to review Green Belt). Forthcoming IRS will set a new development framework for region to 2030. Likely that more recent advice from NHPAU will be used to set Region's housing requirements. Important to have regard to NHPAU's latest guidance when developing Core Strategy. This states that Yorkshire and Humber Region is required to deliver 32% uplift on current RSS target. If this is applied to York will be required to plan for 1,122 new homes per annum for period 2008-2031. This means Council would need to identify land for 24,684 new homes between 2008 and 2031, an increase of 7,106 on numbers it is proposing to plan for. Council currently suggests a requirement for draft Green Belt land to accommodate 4,431 further homes up to 2030. When requirement for 7,106 further homes is added could be a requirement to identify possible land for 11,517 new homes. Given approach to Areas of Search at Metcalfe Lane and Monks Cross achieving densities of 32 dwellings per hectare, there is a compelling case to identify a further 220 ha of land; i.e. a total of 360 ha in draft Green Belt. Additional safeguarded land needs to be identified so that Green Belt boundaries can prevail beyond plan period. To be consistent with PPG2 a further 315 ha of draft Green Belt land needs to be identified for period to 2040. c) No case to include an allowance for windfalls. Conflicts with PPS3 and PPS12. No exceptional circumstances exist whereby windfalls can be used. Council can phase and control release of greenfield land for development through annual monitoring report. d) No. Do not support proposals, which limit new housing growth to within Draft Green Belt to east of City at Metcalfe Land and to Monks Cross. Need to identify a selection of housing sites across City so that balanced and sustainable growth can be achieved and housing delivery is assured. When identifying proposed Areas of Search, Council undertook 2003 Green Belt review, which considered which areas of land do not to contribute to function of Green Belt. Having identified these, their potential is assessed in Section 3 of Topic Paper 1; this appears to provide basis used by Council when selecting Preferred Options. Have major concerns about this document.	2527/7948 2528/7972 2537/7996 2688/8020 continued	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq. continued

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	Reflecting need to identify more housing sites than proposed and need to provide a mix and balance of development across City and not just on 2 major sites to east Council should support allocation of a selection of sites across City for residential uses amongst which would be included Sites (part of) E, F and G, along with land at Strensall. e) Oppose proposals to increase density of development simply so that more units can be squeezed on to a site particularly where this can be used to reduce requirement for removing land from draft Green Belt. This is unduly negative, contrary to approach of planning for sustainable communities and delivery of an appropriate mix of housing across City. Important that an appropriate mix and balance is brought forward that meets need of housing market. Currently strongest area of market demand is for family sized homes with gardens. By their nature these require more land than flatted accommodation. Failure to plan for an appropriate mix of housing could hinder aspiration of developing York economy. Oppose setting of minimum densities and recommend instead a policy, which aims to optimise densities on specific sites. This would give greater flexibility and not prevent delivery of correct balance of housing. f) Support proposals to increase provision of family housing. Support 70:30 split proposed on a citywide basis but would caution against use on specific sites. Development of individual sites should be guided by their specific character and nature. Need to ensure flexibility to respond to changing circumstances. g) Cannot be anticipated at this stage and should be addressed in a future review of Core Strategy. Committing to such an approach at this stage appears unduly negative and could undermine creation of a mixed and balanced community. h) Should be flexible on how densities and housing mixes are applied. Object to proposals to set housing density and type requirements in Core Strategy. On specific key strategic sites, density and house types could be guided by an AAP or SPD.	2527/7948 2528/7972 2537/7996 2688/8020 continued	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq. continued
	f) and g) Support findings of SHMA in showing that long term need is for a majority of houses compared to flats. Also agree that a 70% provision of houses is relevant in current context. Need for flexibility in policy wording to cater for changes in market conditions over life of 20-year plan period. Requirement towards end of plan period may well be for smaller properties such as flats. Should provide mechanism for further assessment within plan period, thereby providing flexibility to respond to changing market requirements.	2540/8040	National Grid Property

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	a) SHMA identifies significant housing need in excess of annual housing provision. IRS will need to increase housing requirements beyond 850 per annum to respond to existing need and growth projections. Windfalls should not be included. Allowance of 2,175 homes will only increase number of flats that come forward further worsening housing mix. A sound approach would be to exclude a windfall allowance and identify more Greenfield land to ensure right housing mix is achieved and 70% houses are delivered throughout plan period. b) Need to consider whole plan period and be able to respond to different economic circumstances. SHMA identifies significant housing need in excess of annual housing provision. IRS will need to increase housing requirements beyond 850 per annum to respond to future need and growth projections. A higher level than 850 per annum should therefore be provided from 2026-2030. c) Use of windfalls is inappropriate let alone allowing for a higher level of provision. Approach to windfalls not inline with PPS3. Failed to take into account future trends. Provision of 2,175 homes from 2025/26 to 2030 is based on historic rates, which have been flat dominated. Given that 70% of all new homes delivered over plan period need to be houses, then making an allowance for windfalls based on historic delivery that resulted in a flat dominated housing mix from is inappropriate. This is made worse by nature of windfall sites as Brownfield urban sites that often deliver flatted development. Allowance of 2,175 homes as windfall will only increase number of flats that come forward further unbalancing housing mix. Sound approach would be to exclude windfall allowance and identify more Greenfield land to ensure that right housing mix is achieved and 70% houses are delivered throughout plan period. Consider that all of 6,606 units that cannot be provided on urban sites should be provided on Greenfield sites. d) Additional land should be released from Green Belt to meet need and ensure delivery. Land South of Moor Lane, Woodthorpe, should be included as a preferred area of search. e) Need for low-density development in urban area to protect historic environment. Should therefore be more land identified for release from Green Belt to deliver houses. f) Support provision of 70% houses and 30% flats. Existing need for houses, which will need to be provided throughout plan period. Provision of a higher level of flats to reduce need to deliver houses in Green Belt is not a viable approach and will worsen housing mix situation. g) Mix of flats should not increase towards end of plan period, as there is an identified need to provide 70% houses till then. h) Setting minimum densities in Core Strategy appropriate so no need to be more prescriptive.	2542/8079	Moor Lane Consortium

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	Recognise that where a parcel of land satisfies all criteria of PPG 2, should remain in Green Belt. However, if land is re-assessed against these criteria, there will be parcels of land, which could be released as do not meet criteria. In response to section (C), a combination of windfall land and Green Belt departures could suffice in meeting required amount of land. Parcels of land, which are found not to meet Green Belt boundary criteria will facilitate there being no need for increase in housing densities due to lack of available land. Will also allow for land under Green Belt allocation, which met criteria fully, to remain protected. Permitting release of land at Tadcaster Road for housing, would allow Green Belt to be rounded off and help maintain degree of permanence that remaining Green Belt should have. Agree with content of policy CS5B up to point (iii). Do not consider that expansion of sub-regional city of York should specifically be directed to Areas A and B. As identified all future housing sites should be in locations, which have good access to key local services, such as schools and shops. Land at Tadcaster Road meets this easily.	2576/8099	The Wilberforce Trust
	b) No. Should plan for higher levels of housing growth, above 850 dwellings pa, to more closely reflect future housing projections. Appropriate representations should be made to IRS. c) No. Should not include a higher level of windfalls in Plan. h) Best approach would be based upon a site-by-site negotiation process.	2687/8120	Tangent Properties
	Consider that reliance on 100% of dwellings, which benefit from planning permission, coming forward is unrealistic and a misrepresentation of current situation. Figure should therefore be discounted. Doubt whether market will deliver even the reduced contribution of flatted accommodation in future. On some of key development sites majority of indicative dwellings would have been flats. Now unlikely these flat units will be brought forward. As some of these are unsuitable for family housing question assumptions behind dwelling numbers to be provided from these major sites.	2696/8191	Thomlinsons Solicitors of Wetherby
	a) to c) Agree Core Strategy should reflect (as a minimum) housing targets set out in RSS. In considering housing land capacity to accommodate additional 13,442 homes outlined in paragraph 8.7 existing position appears to be overstated. Anticipated residual land requirements are based on out of date and untested information and therefore unsound. Similarly, completion rates set out in SHLAA, are overstated on basis assume that 95% of all sites granted planning permission will be completed in 5 years. As some of these sites still remain uncompleted, unlikely that future permissions will be delivered within 5 years. To assume a figure of 95% during economic downturn is unrealistic and inappropriate to discount these figures by such a small amount when this is based on data gained during a buoyant market.	2698/8240	Commercial Estates Group and Hallam Land Management

Section 8: Housing Growth, Distribution, Density Mix and Type continued

Paragraph etc	Comments	Ref.	Name
Question 8 continued			
	Unclear how windfall allowance for very small sites has been calculated. In addition PPS 3 specifically states that no allowance should be made when planning housing land supply unless can demonstrate exceptional local circumstances, which justify its use. No attempt made to demonstrate this, such as a significant amount of previously developed land sources that might justify need to include a Windfall allowance. Appeal decisions and official statements confirm that housing targets provide a target for at least a 15-year period, and should not be regarded as an annual cap. Council should set a housing target, which offers best prospects of enabling housing aims to be achieved using RSS figures as a guideline. Clear need to provide a supply of housing from suitable sites that can achieve York's housing objectives, including addressing affordability problem, within national context of increased housing supply. Approach to assessing housing land supply is optimistic and unrealistic, should adopt a more flexible approach to assessing and planning future housing targets. e) to f) Agree need to provide a greater number of houses and desire to deliver 70% of new residential development as houses seems sensible. Note that 60% of committed development between 2004 and 2008 was for apartment schemes. This represents approximately 55% of York's overall housing target for flats up to 2030. To start setting site thresholds, which would dictate, overall mix of houses and flats would go beyond remit of Core Strategy. Should be considered s part of Development Control Policies and Allocations DPDs.	2698/8240 continued	Commercial Estates Group and Hallam Land Management continued

Section 9: Access to Affordable Housing

Paragraph etc	Comments	Ref.	Name
General			
	Recognise that affordable housing is not only a local issue but also a national political topic. However, consensus is that delivery, even prior to current economic conditions, is very challenging with targets set. Would like to form multi party focus group and run theoretical models, based on real sites to demonstrate challenges faced. Would include parties at all stages of process and hopefully generate a macro view to assist deliberations and creative thinking. More emphasis should be given to intermediate housing leading to stakeholder led affordable housing. Alluded to in topic paper published with LDF but has not been delivered to date. SHMA suggests a need for 455 intermediate properties with a current supply of only 16. Support need for affordable housing, but its delivery is more challenging.	57/7219	York Property Forum
	Need to recognise viability of thresholds and proportions proposed. Important to recognise that for development of brownfield sites, or sites with particularly high infrastructure costs, might not be economically viable to achieve target of 40% as outlined in RSS.	479/7742	Yorkshire Forward
Context - Local Issues			
Paragraph 9.10	Support.	458/7594	York Green Party
Paragraph 9.14	LDF needs to be strengthened vis a vis negotiating with developers regarding reductions to affordable housing target on basis of unforeseen additional costs of development: - • Unforeseen element could be emphasised more; onus should be on developer to prove could not possibly have foreseen additional cost at time of land acquisition; • Full financial assessments should be provided so can assess accurately that claimed additional cost does equal proposed reduction in affordable limit; • Full technical details of additional costs should also be provided.	458/7595	York Green Party
	Negotiations on provision should take into account variety of factors affecting viability of scheme, not just abnormal site costs. Viability needs to be written into any target.	2542/8080	Moor Lane Consortium
The Preferred Approach			
General	Need for affordable housing in many of villages is apparent. Current policy of 50% of two and over dwellings built in villages with population of under 5,000 is most effective way of providing this. Exception policy for Green Belt land on edge of villages to be approved for affordable housing development may be seen as another effective way forward but has disadvantage of putting it altogether rather than within a mixed development, within community, not on edge.	203/8317	Ms J Hopton
The Preferred Approach - Viability Testing			
Paragraph 9.24	Viability assessments should be based on full financial information. Assessors should be council officers or independent assessors.	458/7596	York Green Party
	Support need for viability assessments to be provided where necessary.	2542/8081	Moor Lane Consortium

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach - Allocated Sites			
Figure 12	Land south of Moor Lane, Woodthorpe, should be included as an area of search.	2542/8082	Moor Lane Consortium
The Preferred Approach - Rural Exception Sites			
Paragraph 9.27	As there will undoubtedly be a need for small family sites, which may be difficult to accommodate within York itself due to affordability issues, then as 1/2006 suggests, a rural exceptions site should be considered for Gypsy and Traveller sites.	396/8318	Friends Families & Travellers
The Preferred Approach - Affordable Housing Supplementary Planning Document			
Paragraph 9.28	Support.	458/7597	York Green Party
The Preferred Approach			
Policy CS7	Need to be able to justify the 50% affordable housing target, which is higher than the RSS figure of 'over 40%', and support policy with an economic viability study.	1/7101	Government Office
	Affordable housing provision in student housing accommodation not appropriate. Target should be in line with RSS, not higher than 40%. Acknowledged that 50% target is not yielding level of affordable housing to meet identified needs. More pragmatic and deliverable approach needs to be adopted. Percentage provision should be based on viability assessment and an agreed methodology. An "open book" approach should be adopted early in planning application process. May not be possible to achieve target, which needs to be positively acknowledged. Innovative approaches to provision supported and off site commuted sums may provide successful solution to delivery. Not appropriate to "tax" new commercial developments because of perceived burden they may place on housing market. Could stifle economic development and undermine vision. Concerned this could be extended to include University. Like new businesses HEIs investments are far reaching and the benefits they bring should be acknowledged without placing further financial burdens on them.	45/7180	York St John University
	Object in context of British Sugar site. Policies relevant to redevelopment of York Northwest should be dealt with as part of AAP. Unhelpful for three affordable housing options to be presented. In the context of British Sugar site, commenting on basis of a specific regeneration proposal of approximately 1,300 houses. Whilst may be appropriate for an element of affordable housing to be located here, consideration of quantum and type should be based on further consideration of costs of developing site. Cannot judge what may be capable of being supported by development, as viability assessments for site have not been completed.	525/7524	Associated British Foods plc
	Approach inappropriate as seeks to conceive policy in absence of an approach to assessment of affordable housing provision in accordance with PPS3. Until an exercise has been undertaken which is compliant with National Policy, consideration of options is meaningless. Policy should be devised against a proper evidence base, which takes full account of viability.	606/7765 610/7788	Jennifer Hubbard Mr G E Wright

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS7 continued	Level needs to be based upon a comprehensive viability assessment as stipulated in PPS3. Until this has been completed no formal comment can be made on level proposed. Council should ensure a robust and comprehensive assessment is performed prior to any formal target figure being set. Recognition should be given to need for affordable housing levels to be negotiated in relation to specific proposals or site-specific issues.	607/7777	CEMEX
	Option for viability testing should be expressed in wording of Policy to cater for variation that exists between development sites. Individual applications should be assessed on own merits.	2540/8041	National Grid Property
	Object to Options 1 & 2. Support 3 as most realistic in helping to ensure large-scale developments are viable. Viability needs to be written in to ensure housing can be delivered.	2542/8083	Moor Lane Consortium
Question 9			
	a) and e) Preferred approach should be one which assesses capability of developments to deliver affordable housing at a level of 40%. A wide range of issues needs to be considered including economic viability of land for housing; the potential risks of delivery; likely levels of finance available; and the findings of an up to date SHMA. Need for affordable housing in York likely to vary from place to place, and blanket approach not appropriate. A third option is required: - Affordable housing is considered on a site-by-site basis and in consideration of: - Economic viability; Potential risks to delivery; The levels of finance available; An up to date Strategic Housing Market Assessment. b) Supports Option 2. c) Supports option of developers having potential to supply affordable properties off site, by way of an appropriate level of financial contribution, which has regard to economic viability.	161/7250	Persimmon Homes (Yorkshire)
	Supports proposed approach to plan for less than current 50% affordable housing target to align more closely with provisional RSS target. Should undertake an update to current SHMA. Characteristics of housing market have changed significantly since report was commissioned and as such it is no longer considered to be a robust and credible evidence base. Option 3 is most appropriate. However, should make clear basis on which off site contributions should be calculated. Sliding scale targets sought should be justified with reference to an up to date SHMA and be subject to viability in all cases. Currently proposed option 3 also states that "maximum target" for sites of over 30 dwellings is "at least 40%". This is unclear and fails to provide clear guidance on what the maximum target is.	164/7262	Hogg Builders (York) Ltd

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
Question 9 continued			
	a) Do not agree that 43% of all housing being built is achievable. Developers cannot provide this and make a profit. If they don't develop houses will have a massive shortfall. Some compromise has to be reached. b) Option 3 is best out of three approaches given. c) Support. d) Do not consider an avenue that York should explore. York has a very low rental threshold and development of commercial property is marginal at best. Additional costs will stop development proceeding. e) Why not allow developers to provide homes and rent them out for a number of years as affordable homes and then sell them in market, after say 20 years, at full price. This means should always be a supply of homes coming into market for 20-year periods, which are affordable. Affordable homes should be affordable to buy, not to let, as this causes major problems with market place. Present policy provides majority to let not to buy, which is an added problem in terms of development funding.	198/7286	The Helmsley Group
	a) Desired percentage of affordable housing cannot properly be identified until Council has completed an affordable housing viability assessment as part of evidence base. Viability considerations are crucial to delivery of housing, and until necessary assessment has been done, cannot comment on most appropriate affordable housing option. However, should be flexibility within emerging policies to permit negotiation of affordable housing on a site-by-site basis, in context of viability considerations. Welcome acknowledgement in paragraph 9.14 that it will not always be possible to achieve 50% affordable housing, as there may be contaminated sites with very high clear up costs which could not have been identified at the time of acquisition. York Central sits within this category. d) Seeking to secure contributions towards affordable housing from commercial developments should not be an option going forward. PPS3 states that where it can be robustly justified, off-site provision of affordable housing or a financial contribution in lieu of on-site provision may be accepted. There is no reference to requiring affordable housing from commercial developments within guidance.	214/7333 621/7379	Network Rail National Museum of Science & Industry

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
Question 9 continued			
	a) Agree with target, which should be a minimum. If short falling in previous year it should be added to current year. Assuming 1000 houses previous year of which only 30% were built as affordable, future years target should be uplifted to 56%. b) None – more radical approach required. Option 3 is nearest. Would present what is effectively a tax on all new build to pay into fund for affordable housing. Could build 100 houses without building one affordable on that site. Would have to provide enough funds for 43 affordable houses, which could be built anywhere. Council would have to manage fund and see it was used correctly. Could be used to renovate property as well as building new affordable houses. c) Agree strongly - see reply to b) above. d) Would be counterproductive, better to have low paid jobs than higher unemployment. Issues are separate and should be kept that way. Affordable housing is not the responsibility of prospective employers. e) Don't see how options will deliver target so suggest response to b) would deliver results.	218/7403	Northern Gas Networks
	Council's approach since 2005 has meant a 50% target for affordable housing. However policy has been applied as a maximum target subject to potential reduction in site-specific examples, particularly where abnormal costs have affected viability of schemes at this level. Clear that a 50% target, particularly on smaller sites and certainly on sites with unforeseen abnormal costs is too onerous on developers and results in many schemes proving unviable. PPS3, supported by recent case law decisions indicates that affordable housing policy must take into account issues of viability in formulating thresholds and targets, and that such considerations should not be limited to site-specific negotiations. At this stage, viability assessment has yet to be completed. As such proposed policy has three potential options, rather than one preferred option. Without robust evidence base in relation to viability matters, difficult to assess whether either of sliding scale options put forward are suitable or achievable. Object to imposition of current policy position at Option 1. In principle support adoption of sliding scale approach, however levels at which affordable housing would be required, and at what thresholds, cannot yet be suitably assessed. Support imposition of maximum targets, which again would allow for consideration of site-specific matters and abnormal costs.	331/7478	Taylor Wimpey (UK) Ltd

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
Question 9 continued			
	a) Support. b) Recognise amount of work that has been done to negotiate options to produce a higher level of affordable housing completions. Support Option 2. c) Should only be applicable as in Option 2 for sites of 1 – 4 dwellings within Main Urban Area. Support idea of using money to buy empty properties, but not sure how practical this will be. Need to sustain transparency regarding money, perhaps as part of an overall policy on developer contributions. d) Support. e) Option 2 offers an appropriate and fair method regarding private sector provision of affordable housing. However, do not believe this is best way. More emphasis should be given to other direct measures. Council should lobby central government for policy changes such as taxing land banking by developers and increasing social housing grant. Councils should be allowed to spend up to 100% of their receipts directly on provision of affordable housing. Development of appropriate small sites with 100% affordable housing should be encouraged.	458/7598	York Green Party
	a) Not in a position to submit alternative evidence regarding a revised target. However, 43% affordable housing requires rigorous testing and suggest Council gives due consideration to feedback from residential developers. b) In context of British Sugar site, do not consider any of options should be applied in calculating affordable housing provision. Inappropriate to pre-judge viability of site's redevelopment and quantum of affordable housing. c) Support as allows for maximum flexibility and recognise in some cases may be appropriate. Do not consider this is relevant to British Sugar site. e) In context of British Sugar site, target and method will be addressed through AAP. At this stage, policies should not apply to York Northwest, as it pre-judges AAP.	525/7525	Associated British Foods plc
	PPS3 requires LPAs to set an overall (plan-wide) target for amount of affordable housing to be provided and states target should reflect new definition of affordable housing. No reference to this within Core Strategy. Should also reflect an assessment of likely economic viability of land for housing within area. LPAs should aim to ensure that provision of affordable housing meets needs of both current and future occupiers, taking into account information from SHMA. No evidence that Core Strategy has yet assessed and justified any of the options or targets for affordable housing on up to date viability grounds. Not correct approach for Council to set a target and leave it up to individual developers to justify, on a site-by-site basis, a departure from this base position. It is inappropriate to consult on potential level of affordable housing provision without test of viability, which is a crucial part of planning policy.	546/7707 2510/7878	Miller Homes Ltd Taylor Wimpey UK Ltd

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
Question 9 continued			
	It may be impossible for many sites to deliver affordable housing particularly within current economic climate and Core Strategy needs to address this challenge to viability as a fundamental part of its approach to affordable housing.	546/7707 2510/7878 continued	Miller Homes Ltd Taylor Wimpey UK Ltd continued
	Provision should be negotiable and of options put forward 3 is better. Need to be flexible and allow leeway if affordable housing aspect is main priority. Developers should also have option to provide offsite affordable housing or whichever is more appropriate provide a financial contribution for affordable housing direct to LPA. Consider methods to achieve target of 43% will not meet desired outcome. In many instances policies for affordable housing have hindered development and will continue to if LPA are not realistic and flexible in their approach. Other evidence that needs to be taken into account in affordable housing policies includes: - The Blyth Valley Appeal decision; economic down turn (some SHMA prepared for other Authorities in region have indicated a potential for zero percent delivery of affordable housing during current economic recession); market changes; impact of code of sustainable homes; and CIL. Not to do so will ignore a substantial element of evidence on which those policies must be founded and will render DPD unsound. d) Commercial enterprises should not be expected to alleviate problems of attaining affordable housing target. This could potentially stop a prospective employer from operating within York, which could impact on its economy.	568/7714	The Land and Development Practice
	Emissions from all new housing developments should be considered in terms of both carbon dioxide and nitrogen dioxide emissions. Aim in all cases should be to keep these to a minimum and where possible reduce them compared to previous uses. Where an increase in emissions cannot be avoided, developers should carry out mitigation measures to offset them and/or contribute towards a central low emission fund.	2291/7824	CYC Environmental Protection Unit
	a) and e) Preferred approach should be one, which assesses capability of developments to deliver affordable housing at a level of 40%. A wide range of issues needs to be considered including economic viability of land for housing; potential risks of delivery likely levels of finance available; and findings of an up to date SHMA. In view of this, need for affordable housing is likely to vary from place to place, and a blanket approach is not appropriate. Suggest consider a further option. Consider this comprises a third option, called Option 3: - “Affordable housing is considered on a site-by-site basis and in consideration of: 1. Economic viability, 2. Potential risks to delivery, 3. The levels of finance available, and 4. An up to date Strategic Housing Market Assessment”	2517/7904	Lands Improvement

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
Question 9 continued			
	Such an approach will meet requirements of PPS3 and RSS and allow Council to secure provision of an appropriate level of affordable housing within future housing developments, whilst ensuring that schemes remain viable and deliverable. b) Supports approach in Option 2 regarding setting affordable housing site size thresholds. c) Supports developers having option to supply affordable properties off site, by way of an appropriate level of financial contribution, which has regard to economic viability. d) Objects to this potential policy approach as no national or regional guidance to suggest that commercial development should contribute to affordable housing. Could potentially make deliverability of commercial developments unviable, undermining York's economic aspirations.	2517/7904 continued	Lands Improvement continued
	a) Without a viability appraisal, Core Strategy cannot set any targets for affordable housing. b) Option 3 is considered to provide fairest approach. Requirement for at least 40% affordable housing above 30 units should be deleted because viability appraisal of an individual scheme could demonstrate that 40% is not achievable. The use of term "...at least..." is also contrary to guidance in paragraph 29 of PPS3. c) Should have option of off-site provision or payment of commuted sum particularly on smaller schemes. May be best response for certain types of housing such as conversion of buildings. d) Commercial development should not be required to contribute to affordable housing. Could lead to York becoming less attractive to inward investors particularly where adjoining areas do not have these requirements.	2523/7919	Grantside Ltd
	Supports approach to plan for less than current 50% affordable housing target to align more closely with provisional RSS target. It is essential that any target emerges from an up to date and robust evidence base. SHMA should be reviewed as characteristics of housing market have changed significantly since report was commissioned. Any proposed affordable housing target should also have been subject to an economic viability assessment. SHMA review, followed by an economic viability assessment is required to provide necessary evidence to underpin emerging policies. Considers Option as most appropriate option. This will secure provision from small sites, which has previously been lost. Option for developers to negotiate an offsite provision would also add flexibility and potentially help affordable housing to be delivered in locations most in need. Should make clear basis on which off site contributions should be calculated. Specific sliding scale targets sought should also be justified with reference to an up to date SHMA and must be subject to viability in all cases. Currently proposed option 3 also states that maximum target for sites of over 30 dwellings is at least 40%. This is unclear and fails to provide clear guidance on what maximum target is.	2524/7933	Barratt Homes (York) Ltd

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
Question 9 continued			
	a) No. PPS3 states that targets need to reflect economic viability of housing land. Although Council have indicated a viability assessment will be undertaken, it has not happened yet and failure to do so can lead to viability of this target being questioned. Weight given to SHMA, which is based on aspirations of respondents, should be balanced against current housing register, which can be considered to be an indicator of need. SHMA was published at peak of housing market in September 2007. Since then there has been a considerable decline in house prices, which raises a question mark about ability to accurately reflect affordable housing need. Should have regard to a fuller range of considerations and evidence when setting affordable housing target. b) Important Council develop a comprehensive and robust evidence base to underpin policy. Circular 05/2005 sets out 5 tests that planning obligations must comply with for them to be considered sound. Amongst these is requirement for an obligation to be directly related to proposed development and fairly and reasonably related in scale and kind to proposed development. Obligations must be sought in relation to uplift in housing, not increase in value of a site. PPS3 requires that specific targets and thresholds are appropriate to meet needs balanced with need for them to not undermine viability of development sites. It indicates the minimum site size threshold is 15 units but that this can be reduced supported by evidence. Appears to be an evidence deficit in justification. Fundamental concern over Option 1, which is current approach. Although used by Council, target of 50% has never been tested. In current housing market approach is neither appropriate nor justifiable. In principle support Option 2's approach, but requirement for 50% of homes on certain sites to be affordable is excessively onerous. May prevent delivery of larger sites, which would be heavily penalised by its requirements. Approach to delivery in villages is wrong as term is too loosely used and prejudicial to development in sustainable areas of York urban area such as Strensall, Haxby, Upper and Nether Poppleton, Copmanthorpe, Bishopthorpe and Dunnington. Support Option 3's reduction in upper target. However concerned at use of words "at least" which denies flexibility to policy. Also level of steps between thresholds could hinder full development of certain sites. Each Option has significant areas of weakness. Suggest alternative, which, subject to necessary testing and justification, represents most appropriate of options that would ensure delivery of affordable housing whilst not prejudicing viability of sites due to more moderate targets and more flexible wording.	2527/7949 2528/7973 2537/7997 2688/8021	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name																		
Question 9 continued																					
	This could state: - “Policy CS7 Affordable Housing In all settlements affordable housing will be secured by negotiating a realistic proportion of affordable homes within private housing schemes, in accordance with the following sliding scale. <table><tr><td>Site Size</td><td>Target</td></tr><tr><td>1-4 dwellings</td><td>Off site financial contribution (OSFC)</td></tr><tr><td>5-10 dwellings</td><td>Up to 10%</td></tr><tr><td>11-14 dwellings</td><td>Up to 15%</td></tr><tr><td>15-18 dwellings</td><td>Up to 20%</td></tr><tr><td>19-22 dwellings</td><td>Up to 25%</td></tr><tr><td>23-26 dwellings</td><td>Up to 30%</td></tr><tr><td>27-30 dwellings</td><td>Up to 35%</td></tr><tr><td>31+ dwellings</td><td>Up to 40%</td></tr></table> Developers have the option to negotiate an off site provision. The Council will consider the payment of commuted sums in lieu of onsite provision.” c) Yes, subject to robust justification. d) No. Housing and commercial development are separate entities, proposal has no basis in PPS3 and would be at odds with tests in Circular 05/2005. If this was taken forward would prejudice economic development of city. e) This has already addressed in response to a) and b).	Site Size	Target	1-4 dwellings	Off site financial contribution (OSFC)	5-10 dwellings	Up to 10%	11-14 dwellings	Up to 15%	15-18 dwellings	Up to 20%	19-22 dwellings	Up to 25%	23-26 dwellings	Up to 30%	27-30 dwellings	Up to 35%	31+ dwellings	Up to 40%	2527/7949 2528/7973 2537/7997 2688/8021 continued	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq. continued
Site Size	Target																				
1-4 dwellings	Off site financial contribution (OSFC)																				
5-10 dwellings	Up to 10%																				
11-14 dwellings	Up to 15%																				
15-18 dwellings	Up to 20%																				
19-22 dwellings	Up to 25%																				
23-26 dwellings	Up to 30%																				
27-30 dwellings	Up to 35%																				
31+ dwellings	Up to 40%																				
	a) 40% affordable housing should be sought in line with Yorkshire and Humber Plan. b) Option 3 most realistic in terms of helping to ensure large-scale developments are viable. c) Support developers having option to provide affordable housing off site in areas where addressing deprivation and need may be a pressing priority (e.g. Foxwood). e) Option 3 is best placed to facilitate delivery.	2542/8084	Moor Lane Consortium																		
	b) Option 3 is supported as the best option. c) Yes. d) No.	2687/8121	Tangent Properties																		
	Further work on viability testing and discussion on tenure type, which can significantly impact upon viability levels needs to be undertaken and agreed with industry representatives prior to submitting Core Strategy for examination.	2689/8160	Monks Cross North Consortium																		
	a) Agree. Must be secured through negotiation and subject to assessments of site viability. b) Sliding scale approach offers most amount of flexibility to ensure that developments remain viable to provide new homes. Also guarantees that some affordable housing will be secured helping towards affordable homes target.	2698/8241	Commercial Estates Group and Hallam Land Management																		

Section 9: Access to Affordable Housing continued

Paragraph etc	Comments	Ref.	Name
Question 9 continued			
	a) Targets and Policy must be sufficiently flexible and realistic to ensure viability of proposed schemes. Target of 43% is unlikely to be viable on any scheme in current climate. Even at height of housing boom in 2006/2007, schemes approved in York were not reaching over 40% affordable housing. SHMA was prepared during an economic boom period and therefore does not reflect current economic position. Data used is out of date and has potential to distort calculations such as affordable housing, with use of overly optimistic growth scenarios. b) Option 1- Target of 50% is unachievable and unviable. Option 2 - Provides a more flexible solution. However, sliding scale should not be determined on number of dwellings alone. Each site should be considered on individual merit, taking into consideration type of housing required in area on a qualitative basis, as well as considering constraints and S106 contributions also required at each site. Threshold should remain as set out in PPS3. Restricting smaller sites will prevent small-scale investment in York, resulting in developers looking elsewhere. Smaller sites do not benefit from same economies of scale as larger development sites therefore, providing any level of contribution is unviable to development and further restricts supply. Option 3 - Range more attainable under this scenario. However, small sites under PPS3 threshold of 15 dwellings should not be required to provide affordable housing in order to stimulate economic growth where practicable, particularly in current economic climate. Targets should be aspirational only, with other considerations e.g. type of housing to be provided given considerable weight. More important to provide right type in right location to meet identified need, than to meet quantitative targets, which fail to meet needs of population. d) Commercial development should not be relied upon to provide social housing. Would discourage developers from investing particularly in speculative market. Approach is not advocated in PPG4 or draft PPS4. Should not be an over-reliance on private sector to deliver housing. Planning policy needs to be matched with public sector initiatives. Social housing issue in particular, needs to be addressed by Council. By encouraging and supporting development of market housing, supply will increase, allowing house prices to be reduced. This in turn will have a direct impact on affordable housing.	2700/8290	GVA Grimley Ltd
	Many unfinished sites have been abandoned which have only a 25% provision or even no provision at all. Industry cannot be expected to provide 43% affordable housing when it cannot even build-out existing approved schemes with a much lower provision. House builders also face increased future burdens in relation to surface water run-off and Code for Sustainable Homes, which represent further significant costs to each house built.	2701/8291	Laverack Associates Architects

Section 10: Access to Services

Paragraph etc	Comments	Ref.	Name
General			
	Need for new swimming provision in city centre noted. Remains option of incorporating this within proposed community stadium complex. Council reports indicate that this option is not being pursued. Already there is conflict between Council policy and LDF.	52/8332	York Environment Forum
	Note LDF will be relying on Heslington East to provide community access to some sports facilities including provision of one of the 'needed' swimming pools. Past experience indicates that this may never happen.	56/7210	Heslington Parish Council
	Paragraph 10.1 makes "communities" synonymous with "neighbourhoods". University is itself a large community and one, which actively manages itself to maximise beneficial impacts on its own members and on others. Strategic Objective should be widened to encompass communities rather than neighbourhoods. University supports City's communities through: - provision of varied progression routes into HE; wide range of outreach work in continuing education, public lectures and schools contacts; nationally leading student and staff voluntary community engagement; public access to sporting and leisure facilities, academic support for cultural and social institutions and activities. The Science Park is also a community of employees who have an organising body to represent their interaction and interests. Also have a shared social space on Science Park.	190/8280	University of York
Introduction			
Paragraph 10.1	Support general approach to access to services in local neighbourhoods.	458/7599	York Green Party
Context - Policy Context			
Paragraph 10.2	Support general approach to access to services in local neighbourhoods and accessible on foot and via cycling and public transport.	458/7600	York Green Party
Context - Local Issues			
Paragraph 10.3	Add to list given: - Include places where people of all ages can meet formally and informally so should also include pubs, cafes, meeting rooms, community centres, youth centres, post offices, crèches, nurseries, local sports & recreation facilities and amenity open space.	458/7601	York Green Party
Context - City Wide Services			
Paragraph 10.4	Suggest consider including provision of a "Showground" site in LDF. Could benefit from provision of an independent "Showground" on a smaller scale to Great Yorkshire site at Harrogate, but offering similar facilities. Best location might be for a site alongside proposed Community Stadium. It should offer space for marquees, camping, motor homes, caravans, and grass track events. Water and elsan disposal facilities could supplement showers and toilets within stadium proper.	2697/8192	York Cycle Show Committee

Section 10: Access to Services continued

Paragraph etc	Comments	Ref.	Name
Context - City Wide Services continued			
Hospitals Paragraph 10.6 - 10.7	Contradictory to other policies. Predicating future health provision on basis of further centralisation of services, a wider catchment area and expectation that more patients will travel greater distances for treatment is entirely at odds with spatial planning policy, which aims to reduce travel distances.	458/7602	York Green Party
Higher & Further Education Paragraph 10.9	Reference needs to be made to fact York St John University continues to evolve its estate to ensure that staff, student and other users needs are fully met. University's 2008 – 2018 Estate Strategy considers need for ongoing renewal and redevelopment to meet higher education requirements. Also developing mutually beneficial partnerships e.g. Science City Digital Arts, York NHS Hospital Trust etc and considering resulting estate requirements which needs acknowledging.	45/7177	York St John University
	Whilst paragraph indicates that changes to national education policy will impact on College, no detail is provided. Likely this policy change will result in an increase in participation and in turn necessitate expansion of facilities at College. Needs to be planned for from outset. Expansion on existing site is limited, but are opportunities to south and east to provide specialist facilities required to meet new policy agenda.	282/7447	York College
Context - Local Services			
Local Health Facilities Paragraph 10.10	Target should be incorporated, applicable to change of use applications for existing services and to proposed new developments, requiring local health services within a maximum of 15 minutes walk from all parts of residential areas.	458/7603	York Green Party
Schools Paragraph 10.12	Support. Target should be incorporated, applicable to change of use applications for existing services and to proposed new developments, requiring primary schools within a maximum of 15 minutes walk from all parts of residential areas.	458/7604	York Green Party
Local Shops Paragraph 10.13	Welcomed. Specific reference should be made to protecting local shopping parades with a presumption against change of use to residential in order to protect local amenity. Target should be incorporated, applicable to change of use applications for existing services and to proposed new developments, requiring local shops to meet day to day needs within a maximum of 10 minutes walk from all parts of residential areas. Enhancement of local shops should extend to suburban centres. Measure of a 5-minute drive time is inappropriate as presupposes that everyone will drive to shops. Unsuitable measure of accessibility or sustainability.	458/7605	York Green Party
	Consideration should be given to meeting need/demand in east of city which is undersupplied and measures need to be incorporated to remedy this under-provision; be that identification of a new district centre and/or new supermarket development	2687/8122	Tangent Properties

Section 10: Access to Services continued

Paragraph etc	Comments	Ref.	Name
Context - Local Services continued			
Community Facilities Paragraph 10.14	Support but needs strengthening with more specific measures.	458/7606	York Green Party
Community Facilities Paragraph 10.15	Support, particularly final sentence, but wonders what specific measures LDF will use.	458/7607	York Green Party
Public Transport & Accessibility Paragraph 10.16	Support principle. Target should be incorporated, applicable to change of use applications for existing properties and to proposed new developments, requiring residential properties to be within a maximum of 400m of a bus stop served by a half hourly or more frequent service in rural areas and within a maximum of 200m of a bus service every 10 -15 minutes in main urban area.	458/7608	York Green Party
The Preferred Approach			
Policy CS8	These issues form a key part of the infrastructure plan. Policy should be made more locally specific and consideration should be given to whether it is deliverable.	1/7102	Government Office
	Final bullet point should acknowledge ongoing support for York St John University's estate needs. Suggest inserting after "Heslington East" "the ongoing enhancements at York St John University".	45/7178	York St John University
	Reference required in Policy in respect of realising potential of Askham Bryan College. Final bullet point refers to "continued success of higher and further education in the city". This could be interpreted as excluding the College, which lies outside sub-regional city as defined on key diagram. Importance of College as a major developed site in Green Belt should be recognised.	276/7442	Askham Bryan College
	Welcome approach to protecting local services, but would like to see additional complementary requirements to make protection more robust. Should be a general presumption in favour of protecting existing community facilities including pubs, cafes, meeting rooms, community centres, youth centres, post offices, crèches, nurseries, local sports & recreation facilities and amenity open space. Onus should be on developers to show there is no local need for facility to be retained. These points should be added in as specific requirements under fourth bullet point of Policy including specifying list of types of services to be protected as per response to paragraph 10.3 (ref 458/7601).	458/7609	York Green Party
	Object to policy in context of British Sugar site. Policies relevant to redevelopment of York Northwest should be dealt with as part of AAP.	525/7526	Associated British Foods plc
	Should indicate that this policy and section sets out aspirations of LPA and Council and does not represent a development control policy.	606/7766 610/7789	Jennifer Hubbard Mr G E Wright
	Support 3 rd bullet point and assume accessibility criteria to assess this is in line with RSS.	2434/7848	Highways Agency

Section 10: Access to Services continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS8 continued	Should "split" existing Policy into a number of policies to focus on specific issues such as location of development, support for hospital development, and support for University Expansion. Also recommend a specific policy on planning obligations, which should refer to "where required" as part of a development proposal.	2517/7905	Lands Improvement
	1 st bullet object to policy on grounds is no consideration of impacts of a new development's contribution to provision of facilities on its viability. Bullet point should be reworded to "The Council will require new development to contribute towards ensuring there are sufficient facilities to meet the needs of future occupiers having considered implications on scheme viability. "	2542/8085	Moor Lane Consortium
	Policy focuses on new services meeting needs of new communities rather than considering how existing communities may benefit from them due to an under provision in their local area. Needs to be considered across city as whole when assessing general areas and extent of any urban expansion to York.	2698/8242	Commercial Estates Group and Hallam Land Management
Question 10			
	Main services are covered, however access opportunities to green and open space and out to the countryside should be included. Places where people can enjoy the natural environment should be provided and created where they are most wanted and needed, close to where people live, and where they want to visit. Sustainable means of access to services outlined, such as walking and cycling, contribute to achieving transition to a low carbon economy.	4/7130	Natural England
	Supports provision of local services and efforts to reduce the need for travel by private car.	49/7190	Yorkshire Wildlife Trust
	Agree.	198/7287	The Helmsley Group
	Agree with statement and don't support any additional services to those already included.	218/7404	Northern Gas Networks
	College is exploring with York Hockey Club potential to provide new artificial turf competition hockey facility. This would need to be provided on land in Green Belt.	282/7448	York College
	Welcome progress in right direction, but needs significantly strengthening. Other local services and facilities should be added as listed in response to paragraph 10.3. Targets and indicators not sufficiently specific or robust to achieve objective of paragraphs 10.1 to 10.3. An SPD on Access to Services should set out detailed requirements re walking distances taking into account varying fitness and mobility of different groups and prioritising needs of most vulnerable. Should detail other definitions such as 'everyday needs' e.g. local supermarket, greengrocers, butchers, bakers etc. Should also include a statement regarding support and promotion of local food.	458/7610	York Green Party

Section 10: Access to Services continued

Paragraph etc	Comments	Ref.	Name
Question 10 continued			
	In relation to new developments required distance to various services should be weighed against likelihood of residents choosing whether or not to use a car to access such services, depending on topography of particular site. Developer should be required to minimise likely car use as far as possible in whatever ways necessary. Should be specific presumption against change of use for community facilities such as shops, pubs, schools where this would result in loss of access to this facility within prescribed distance. Would like to see additional tool developed around concept of 'impact on local infrastructure capacity' so that value of a particular community facility is assessed, not only distribution of other similar facilities in area.	458/7610 continued	York Green Party continued
	Yes. Particularly supports aim of facilitating continued success of higher and further education facilities in York, particularly University of York. Land should be made available to support its future expansion, not only at Heslington East but also at North Selby site.	515/7499	UK Coal Mining Ltd
	In recent years new swimming pools and other public buildings have increasingly come forward with biomass burners as main source of energy. Further development of this type will need to have regard to content of proposed LES and in some cases alternative forms of 'sustainable' energy provision will need to be considered to protect local air quality. Where new public buildings are being created consideration should be given to level of parking that is appropriate and how use of low emission vehicles to access sites can be encouraged.	2291/7825	CYC Environmental Protection Unit
	Yes.	2527/7950 2528/7974 2537/7998 2688/8022	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Agree that all main services are covered. However, commentary appears to overlook issue of a lack of local services for existing communities and how this can be addressed in planning future development needs of district.	2698/8243	Commercial Estates Group and Hallam Land Management

Section 11: Future Economic Growth

Paragraph etc	Comments	Ref.	Name
General			
	Emphasis on growth in business, financial services, knowledge and science-based industries, leisure, retail and evening economy appears to discount any attempts to revitalise any form of manufacturing and development of small scale enterprises which might benefit large sectors of population and be environmentally sustainable. Policies appear to be based on outdated concepts of how societies should move forward in providing economic benefits, and a failure to recognise that "business as usual" is no longer acceptable. Recent report of Sustainable Development Commission – "Prosperity without Growth? – The transition to a sustainable economy" deserves serious consideration as a basis for policy revision. The population of 193,300 supports 85,118 jobs out of a total of 90,418. Simplistic analysis shows that each job is supported by 2.27 people. Based on this, jobs forecast of 116,018 in 2029 would require a population of 263,336. This would be higher due to increasing age of population. This is an even greater population growth than that quoted in Section 1. As this would be far in excess of City's capacity to sustain, the implications are incoming commuters would fill many of the hypothetical new jobs with little benefit to the City. North Selby Mine is cited as suitable for development of renewable energy although it is at present within Green Belt. This could be developed as an employment zone, taking pressure off main urban area, and distributing employment opportunities around City. Advance provision of adequate hard and green infrastructure would be far less costly than attempting to regenerate York Central, with far faster payback. Could be a possible alternative area of search to area C, as being far less visually damaging. There is insufficient emphasis on rural economy and recognition of its important role in supporting settlement viability and as setting for built-up areas, and City in particular. Council should be pro-active in promoting local food production and possible energy crops, provided this does not imply mono-culture and adverse effects on bio-diversity, and explore the potential for greater diversification without loss of productive farmland. Potential economic, employment and environmental benefits of increasing investment in forestry, game and fisheries management and horticulture should be promoted. Appears to be little justification for area I being reserved for employment uses in light of traffic problems, likely to be exacerbated by proposed P&R site.	52/8333	York Environment Forum

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
General continued			
	Drive for high quality jobs and tourism are juxtaposed. LDF does not play to York's strengths as a visitor city. Suggest: - Possible location for the wheel on York Northwest or Hungate; Progression and emphasis on cultural quarter works; Creation of a piazza area in and around Minster; Thought into how public realm can be enhanced pushing towards world heritage status previously mooted; Thought into how car parking areas in city can be improved. Whilst this goes against green policy, shoppers, tourists and offices etc all require high levels of parking. Note commitment to review vision statement to incorporate comments on tourism.	57/7217	York Property Forum
	Concerned that Monks Cross has been identified as a 'new employment site' by Employment Land Review and areas of land, which are considered as Green Belt, will be diminished by an increase in office accommodation at Monks Cross. Monks Cross North has already been subject of a public inquiry (2005) which concluded in favour of non-development of said site for office development class B(i)a, for a variety of reasons.	75/7222	Huntington Parish Council
	Support for tourism and evening economy is welcomed. Useful to remind people that investment in evening economy improves offer for residents as well as visitors.	373/8221	Visit York
	Aim of LDF as outlined is welcomed. More emphasis should be given to potential for technological advances and expansion of University to create new industries and new jobs within York. Green economy is a potential source of new jobs for York and consideration of such industries would be helpful in enabling to plan for future growth in such sectors.	479/7743	Yorkshire Forward
	Section could be used to strengthen concept of use of procurement and planning policy and procedure to support: - Increased levels of training and development of current workforce; Support of future workforce – work experience and internships, apprenticeships; Support for getting unemployed people into jobs. If all sites highlighted in LDF are to be developed possibilities for supporting communities could be much more far reaching than simply obtaining new houses, a new stadium, new employment locations, new shops. If York wants to prosper it must make link to learning and skills, which underpin all other activities. Perhaps this could be included in Policy CS9.	2686/8116	Higher York
	Price of fuel and likely continuing rise will affect both private motorists and commercial and public transport systems and is likely to lead to a reduction in travel. Therefore seems that ambition of increasing visitor income by 5% year on year for next 20 years or so is likely to be over ambitious or unattainable.	2691/8166	I Rowland

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Introduction			
Paragraph 11.1	Supported.	612/7796	Mr R G McMeeking
Context - Policy Context			
Paragraph 11.03	Agree with 'town centre uses' as described in PPS6.	458/7611	York Green Party
Paragraph 11.04	Implications could be teased <i>out</i> further. Could involve recognition of role of wider area (e.g. Yorkshire Wolds) in assisting development of wider York tourism product.	17/7170	East Riding of Yorkshire Council
	Thrust of RSS as described is flawed. For York to grow at rate dictated by RSS would place an intolerable burden on transport infrastructure, harm special characteristics of York and a sudden and sustained influx of new workers could have a destabilising effect on communities. Should aim to strengthen economy, replace lost jobs, encourage entrepreneurial activity, but do so with zero or minimal growth.	458/7612	York Green Party
Context – Local Issues			
Paragraph 11.05	York's economy had a traditional industrial base that will present a key challenge when trying to remediate to an appropriate level to protect controlled waters. Whilst support reuse of brownfield land, it must be remediated and developed in a way so as not to pollute nearby controlled waters. Distinction is drawn between 'land contamination' and 'Contaminated Land'. Contaminated Land is officially determined by a local authority to meet the definition set out in Part 2A of the Environmental Protection Act. 'Land contamination' covers sites that contain pollutants and may require action to reduce risk to people or the environment but have not been determined under Part 2A.	5/7149	Environment Agency
	Supported.	612/7797	Mr R G McMeeking
Paragraph 11.06	Recognise importance of tourism to economy, but note many jobs in tourism are poorly paid. A diverse economy is necessary without reliance on any one industry.	458/7613	York Green Party
	Supported.	612/7798	Mr R G McMeeking
Paragraph 11.07	Agree with thrust of 'Visit York' policy, to increase visitor spend without necessarily increasing number of visitors., but this should not create an 'elitist' focus on high income visitors. Should be developing Sustainable Tourism Strategy focused on attracting regional and UK based visitors rather than promoting international tourism, which depends largely on high volume air travel. Greater reliance on 'home-grown' tourism would improve local resilience in face of global recession faced recently and steeply rising fuel prices, which will inevitably come during plan period.	458/7614	York Green Party
	Supported.	612/7799	Mr R G McMeeking
Paragraph 11.08	This should be taken as evidence that no further growth is currently necessary. Focus for jobs stimulus should be elsewhere in sub-region.	458/7615	York Green Party

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Context – Local Issues continued			
Paragraph 11.09	Estimated job growth figure is not sustainable and should be revised downward to one derived from evidence from an Environmental Capacity Study. Derives from Segal Quince Wicksteed assessments. Estimation that something might be possible, does not dictate its desirability.	458/7616	York Green Party
Paragraph 11.10	Agree that local employment is favourable.	458/7617	York Green Party
Paragraph 11.11	Disagree that 'Future York Group' can be described as independent, given that 8 of 14 organisations represented have development interests in city. These are vested interests and report has been discredited, especially job-growth figures in light of recession. Do not see why report should be given standing of a place in evidence base.	458/7618	York Green Party
Paragraph 11.13	Supported subject to strict adherence to Condition 5 of the Heslington East planning consent.	612/7800	Mr R G McMeeking
Context – Future Growth			
Paragraph 11.14	Predicted increase of total jobs presents an ideal opportunity for adopting SuDs into new developments. Support environmental Sustainability Appraisal section of Policy CS9 of encouraging new and existing businesses to incorporate energy and resource efficiencies, which can be in the form of BREEAM standards. Welcome water efficiency measures such as water-efficient fittings, fixtures and appliances to minimise water consumption and maximising water re-cycling.	5/7150	Environment Agency
	Not clear what land use implications of fact that 49% of anticipated jobs growth in York will be in traditional "employment" uses, e.g. office, industry, R&D, while 51% will be in retail, hotels and catering etc are, except for general preference for such uses to be in city centre. Given pressures for residential units in city centre as well, going to be competing pressures on finite land resources, which will need addressing further in City Centre AAP.	373/8222	Visit York
	Growth of jobs is not sustainable. Likely to damage natural environment, historic environment, place insurmountable pressure on transport infrastructure, and undermine community cohesion. Should be resisted as fails to put sustainability at heart of LDF.	458/7619	York Green Party
Paragraph 11.14 - 11.17	University is a major delivery partner in achieving key theme of "a prosperous and thriving economy" without new land allocations being needed. Core Strategy should indicate this position, i.e. how priorities, programmes and policies will support existing major employers with strong prospects for future. It is referenced in paragraph 11.13 on Future York Group but not in this section. Predicted growth in jobs needs to take account of predicted growth of: - University of York; University related Science City York businesses on Heslington East; Growth of Knowledge Economy elsewhere. Growth in employment at University predicted over next 20 years and submitted in evidence to public inquiry in 2006 was from 2,800 to 4,800. This does not feature in Table 3. If included in B1a) statistic, suggest it be extracted to allow a clearer picture for non-University employment growth, policy and land allocation requirements.	190/8275	University of York

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Context - Future Growth continued			
Paragraph 11.14 - 11.17 continued	Table 3 R&D employment change over next 20 years is given as +306 jobs, translated to +9,651m ² and to +1.21ha of land. Equates to 15 new jobs per year. Difficult to reconcile with paragraph 11.27 and with evidence submitted to public inquiry which predicted 2,500 new R&D jobs over a similar period. This growth does not require additional land allocation, but needs to be differentiated from non-University R&D jobs. The imminently to be constructed Catalyst Building will house approximately 200 people from 2011, all new employment.	190/8275 continued	University of York continued
Paragraph 11.15	Would be more prudent to take greater note of real economic conditions instead of planning as if working under "normal" market conditions. No consideration given to other governors of growth, such as climate change and Peak Oil. Increased transport and energy costs by end of LDF could have significant impact on transport and on economic activity. Projections of growth could be wildly inaccurate even if were desirable to expand to extent indicated, which it is not.	458/7620	York Green Party
	Approach taken to just continue to monitor position is insufficient. Recommended that Council engage with Yorkshire Forward on development of an Integrated Forecasting Framework.	479/7744	Yorkshire Forward
	Support approach taken to adopt a view of planning for normal conditions.	2689/8161	Monks Cross North Consortium
Paragraph 11.16	Table is built on false premise of continued growth at an unsustainable rate.	458/7621	York Green Party
Paragraph 11.16 & Table 3	Support subject to fact that B1(b) requirement for 2006 to 2029 is limited to 1.21ha only. Entec Report implies a questionable methodology, because of exclusion of University staff, since they are classified as 'Education', and hence excluded from total demand. However allocation of 'up to 25ha' is seriously undermined as being excessive in relation to legitimate demand, as constrained by terms of Heslington East Outline planning consent and confirmed by Inspector's Report and Secretary of State's decision letter. Suggestion that this would allow additional growth in sector over and above the demand figure is most strongly contested.	612/7801	Mr R G McMeeking
Paragraph 11.16 - 11.17	Unclear how loss of existing stock will be addressed through allocation of new sites. While no land requirement for B1(c) or B2 uses is identified, new sites will still need to be allocated to accommodate forecast changes within individual sites, and this should be reflected. Consideration needs to be made of implications of growth in non-B class land uses. Draft PPS4 defines economic development broadly and should be reflected. Within York non-B use classes are major employment generators in own right, and implications of these for economy, and requirements that such uses will place on land, needs to be considered to ensure growth is adequately supported. Proposed increase in floor space provision for B8 uses is significant and not well aligned to RES. Other parts of region are better suited to providing significant land allocations for these. More appropriate to direct greater proportion of proposed B8 allocation to higher value land uses that will be more productive in driving future growth in York economy.	479/7745	Yorkshire Forward

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Context - Future Growth continued			
Table 3	Figures are significantly below those in Table 11.2 of RSS. Any departure from RSS would need very strong justification. Could be potential soundness issue.	1/7103	Government Office
	Capacity study is in order before figures can be set. Figures too high.	70/8208	Fulford Parish Council
	Definition of "jobs" is too limited in light of recent guidance in Draft PPS4. Too narrow a focus on traditional B Use Classes and therefore does not represent a true reflection of potential job growth within city.	214/7334 621/7380	Network Rail National Museum of Science & Industry
Paragraph 11.17	Science City York has propensity to deliver higher paid jobs and should be encouraged, but science-based jobs are no more resilient to recession than other. Focus on science jobs denies support for entrepreneurial activity in other sectors of economy.	458/7622	York Green Party
	Supported.	612/7802	Mr R G McMeeking
Context - Distribution			
Paragraph 11.23 - 11.29	Sites suitable but priority should be accessibility by non-car modes combined with nearness to significant housing areas. Use of brownfield land is desirable, as long as will not affect local amenity open space or community facilities. Promote city centre & district locations, followed by sites within main urban area before considering other options, as long as will not affect local amenity open space or community facilities. Proximity to university and other institutions should not be a primary factor and might well lead to focus on green-field sites. Knowledge based industries have least need of physical proximity.	458/7623	York Green Party
Context - Distribution continued			
Paragraph 11.27	Paragraph disputed as incorrect for two reasons. First, proposition that Heslington East can accommodate all of City's anticipated demand for free-standing B1(b) R&D uses is fundamentally wrong. Such users must conform to Condition 5 of Outline Planning Consent, and hence strictly limited. Inspector's Report, and Secretary of State's decision letter confirm this. Secondly, states Heslington East has permission to develop around 25ha of research and development uses. This is incorrect and misleading. Statement recurs throughout Core Strategy, and should be corrected wherever it appears. Correct wording is not "around 25ha" but " up to 25ha ".	612/7803	Mr R G McMeeking
Paragraph 11.28	Support Area C, but oppose Area I on access and road traffic grounds.	612/7804	Mr R G McMeeking
Paragraph 11.30	Support as long as does not involve incineration of waste.	458/7624	York Green Party
Paragraph 11.31	Support need to develop agriculture, including re-use of existing rural buildings.	458/7625	York Green Party
Context – You Told Us			
Paragraph 11.32	Supported.	612/7805	Mr R G McMeeking

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach			
Paragraph 11.33	Do not support untrammelled economic growth as dictated by RSS.	458/7626	York Green Party
Paragraph 11.34	Preference for B1(b) R&D uses to be within proposed new University campus would be contrary to outline permission condition 5(f) which permits knowledge based activities on campus, but only those that can demonstrate they need to be located on site due to aspects such as sharing of R&D ideas, resources or personnel, or undertaking of research activities with University. Other R&D must be located elsewhere. New land allocations need to take account of increasing desire of businesses, to locate near to the University as knowledge component in economy grows.	190/8276	University of York
	Sites suitable but priority should be accessibility by non-car modes combined with nearness to significant housing areas. Use of brownfield land is desirable, as long as will not affect local amenity open space or community facilities. Promote city centre & district locations, followed by sites within main urban area before considering other options, as long as will not affect local amenity open space or community facilities. Proximity to university and other institutions should not be a primary factor and might well lead to focus on green-field sites. Knowledge based industries have least need of physical proximity. Support suggestion of green energy production at North Selby Mine so long as does not involve incineration of waste.	458/7627	York Green Party
	2nd bullet point is supported, but only if these uses fully satisfy terms of Heslington East Planning Consent Condition 5. Reinforced by Section 106 Agreement to provide student accommodation on Heslington campus for all those who require it. 3rd bullet point is supported in respect of Area C, but not Area I.	612/7806	Mr R G McMeeking
	Importance of Heslington East in accommodating B1 (b) uses is not questioned but it should be noted that development at new University campus is restricted to University uses including knowledge based activities, including Science City York Uses, that can demonstrate need to be located on site due to aspects such as sharing of research and development ideas, resources or personnel, or undertaking of research activities within University of York. Research and Development uses with no linkages to University will therefore not be permitted at Heslington East. Should be recognised that provision needs to be made for alternatives to this location, e.g. Northminster Business Park. Whilst CS9 does not necessarily preclude development of B1 (b) uses elsewhere. Paragraph is ambiguous. Sentence to be inserted: - "Notwithstanding paragraph 11.27, [Heslington East's ability to accommodate all of City's anticipated demand for freestanding B1 (b) Research and Development Uses], applications for new B1 (b) development will not be restricted to the new University Campus at Heslington East where appropriate alternative locations exist. This is because B1 (b) uses that are not linked to University activities will not be permitted at Heslington East."	2500/7864	Northminster Properties

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Paragraph 11.34 continued	Lacks flexibility; e.g. B1(a) uses ought not to be prevented within proposed allocation at North of Hull Road. Limiting uses to light industrial and distribution is too prescriptive and development of B1(a) uses would not conflict with aim of focusing most office development into city centre. In addition, there is a lack of recognition that there are a significant number of land uses outside of Use Class B, which can provide employment, e.g. hotels, restaurants, car showrooms etc and which could be located on employment sites.	2687/8123	Tangent Properties
	Agree approach.	2689/8162	Monks Cross North Consortium
Strategic Objective	Should refer to support and partnership with existing employers in meeting key theme.	190/8277	University of York
Targets	Supported.	612/7807	Mr R G McMeeking
Policy CS9	Not clear how figures in policy relate to Table 3 and RSS. RSS Policy E2 states that the centres of Sub Regional Cities, including York, should be the focus for offices. Some of the B1a office sites proposed are out of centre. This raises a number of questions, including whether there has been a sequential test carried out, how these sites fit with the overall place-making strategy, including the AAPs and what alternatives have been considered. Unclear which sites are commitments and which are new proposals. Role of the University of York and the Heslington East campus in the employment land strategy should be more upfront in policy terms since it is a key part of delivering the spatial vision.	1/7104	Government Office
	R&D activities are only part of contribution to economy of University. It produces skilled and knowledgeable graduates and postgraduates who are able to add to skills base of local workforce and has a higher than average retention rate of its graduates in local area. It is a major employer in its own right and by multiplier effect on local economy.	190/8278	University of York
	Does not consider alternative economic development outside B Use Classes, which will continue to provide jobs and contribute towards York's performance as an economically successful city. The siting of a substantial quantum of new retail floorspace on York Central, as commercial driver of wider scheme, would generate a significant number of new jobs and contribute towards growing York as a key driver of LCR, as advocated in RSS.	214/7335 621/7381	Network Rail National Museum of Science & Industry
	Future Growth of York's Economic Sector should recognise contribution that North Selby site can make to York's continued economic success and prosperity. In addition to sites already identified, North Selby site should be identified for employment uses.	515/7500	UK Coal Mining Ltd
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations. Note in context of York Northwest, reference is made to employment uses (B Class) on York Central only.	525/7527	Associated British Foods plc

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS9 continued	Seek a more flexible approach to employment uses on employment land, recognise that other employment generating sui generis uses would be appropriate. Support for this is indicated in paragraph 11.2. Unclear why envisages that Monks Cross will provide an appropriate location for office development when there is also an identified need for B8 sites and other sites were more highly performing in Entec Employment Land Review (Feb 2009). Monks Cross scored highly as being suitable for a mix of employment uses. Suggest inclusion of an additional bullet point to state: - “Allow for closely related sui generis uses to be located on employment allocated sites provided that the uses are; similar types of employment; usually found on employment land” .	577/7756	Costco Wholesale UK Ltd
	6 th bullet point requires changes based on responses on paragraphs 11.16 (Ref 612/7801), 11.27 (Ref 612/7803) and 11.34 (Ref 612/7806). 7 th bullet point is supported subject to changes based on responses to paragraphs 11.28 (Ref 612/7804) and 11.34 (Ref 612/7806).	612/7808	Mr R G McMeeking
	Policy should be amended to enable allocation of sites for new B1 (a) office development within but not limited to list of preferred sites in order to allow for choice, variety and competition. Would allow findings of ongoing evidence base work to be incorporated within Core Strategy, which is likely to result in re-prioritising of sites depending upon deliverability. 6 th bullet point should be amended to read: - "recognising the role of the University of York and the Heslington East Campus in Research & Development (B1b) activities but not limiting new development to this location where appropriate alternative locations exist". Add B1 (a) office development to list of preferred uses for Area of Search I.	2500/7865	Northminster Properties
	Include Land adjacent to A1079 in 6 th and 7 th bullet points of Policy to read as follows: - "Recognising the role of the University of York, the Heslington East Campus and Land adjacent to the A1079 for Research & Development (B1b) activities; Prioritising the reuse of existing underused or vacant industrial sites for B1(c), B2 & B8 uses on the edge of the urban area of York, including Land adjacent to the A1079"	2517/7906	Lands Improvement
	Support ensuring sufficient land is available in right locations. Encouraged to see redevelopment opportunity of Layerthorpe area recognised and welcome further work to explore regeneration potential. Recognise ELR performs a fundamental role in identifying and supporting York's employment sites. In addition Policy should offer mechanism for a rolling review of employment allocations to re-assess suitability of specific sites, should the need arise. This will provide flexibility in fluctuating economic climates over life of plan, thereby releasing unsuitable sites for other forms of uses, and providing opportunity for new employment site allocations where appropriate.	2540/8042	National Grid Property

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
	7 th bullet - Area of Search C (North of Hull Road) is considered appropriate for employment only.	2542/8086	Moor Lane Consortium
Policy CS10	Should be more locally specific with stronger links to Historic City Theme and City Centre AAP.	1/7105	Government Office
	Support aspiration to improve access to rivers and improve river frontage facilities. In addition re-iterate comments from first Issues and Options consultation; any proposed improvements should take into account flood risk i.e. not pose an additional flood risk.	5/7151	Environment Agency
	Support first and last bullet points.	70/8209	Fulford Parish Council
	Welcome measures Council intends to strongly support in respect of culture, leisure and tourism. Support Policy and consider measures equally apply to York Northwest as they do to City Centre AAP, especially in vicinity of National Railway Museum.	214/7336 621/7382	Network Rail National Museum of Science & Industry
	Policies useful. Important to ascertain how will be implemented. Visit York want to contribute to discussions on all themes. "Cultural provision" should include events and festivals as well as permanent activities. Should include appropriate performance space for such activity. Welcome references to residents and visitors both benefiting from cultural and leisure provision.	373/8223	Visit York
	Role and importance of tourism and visitor economy, and links with other elements of York economy, particularly University and Science City York, and necessity of capturing full tourism potential of city require greater emphasis. There are great opportunities to encourage further improvements to York's visitor offer. Improving experience for visitors in terms of public space, a better offer in evenings, longer pedestrian hours and more pedestrian streets will have community benefits for residents of York as well as encouraging visitor to stay longer and spend more in city. Core Strategy should be dedicated to developing visitor economy further by encouraging and leading investment to achieve sustainable, long term growth in value of visitor economy and improving quality of visitor experience. Policy should consider how tourism is connected to other key elements of city's economy, and would be strengthened by clarifying what is meant by 'improving' visitor facilities and accommodation.	479/7746	Yorkshire Forward
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations.	525/7528	Associated British Foods plc
	See response to Section 5 General (Ref 606/7759).	606/7768	Jennifer Hubbard
	See response to Section 5 General (Ref 610/7780).	610/7791	Mr G E Wright
	Support, subject to addition of word " appropriate " at beginning of 4 th bullet point.	612/7809	Mr R G McMeeking
	Should recognise that other areas could assist in delivery of improvements in visitor facilities. Following wording should be inserted: - After "LDF" - " including "; After "tourism provision" - " throughout "; and after "accommodation which" - " are easily accessible by a variety of transport modes and "	2517/7907	Lands Improvement

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Question 11			
	b) Supports establishment of new employment sites in or adjacent to existing settlements. Where travel between communities and strategic employment sites are required, the establishment of new public transport initiatives as opposed to road links is desirable. Strongly advises that development should be located where employees can access the site using methods of transport other than private car. With reference to the use of existing employment sites, supports creation of employment opportunities on 'brownfield' derelict industrial sites, as well as changes in use of existing sites, as this will help to reduce the loss of sites with a high biodiversity and landscape value. Would wish to see developments, which contribute to the green regeneration of the area, e.g. through sustainable design, integration of green space, and biodiversity enhancements.	4/7131	Natural England
	Notes potential Area of Search to north of Hull Road as a potential allocation for industrial and distribution employment. To facilitate more sustainable modes of transport and encourage the movement of freight by alternative forms of transport it is suggested that any large allocation for industrial and distribution employment uses should include the opportunity for multi-modal forms of transport. Concerned that this site only appears accessible to road users and suggests that alternative, more sustainable sites may need to be considered. However, should site remain as an area for development it is important that any subsequent allocation for employment uses provides for appropriate mitigation measures to prevent an increase in traffic volumes generated on a strategic highway (A1079), which already suffers from congestion and unreliable journey times (over 15,000 commuters every day).	17/8289	East Riding of Yorkshire Council
	Supported. As with housing, it will be important to ensure that LDF reflects emerging IRS in terms of potential employment growth and supply of employment land. The proposals in relation to culture, leisure and tourism are also supported. However, important to ensure that any policies are aligned with those of Visit Yorkshire and link York's tourism product with adjacent areas to support regional tourism initiatives.	18/7174	North Yorkshire County Council
	a) and b) See comments under general (Ref 49/7181) on levels of growth for York. To base future planning on Future York's report that the York economy should double by 2026 may lead to excessive development and also traffic congestion, which could have a negative effect on the important tourism industry.	49/7191	Yorkshire Wildlife Trust
	Do not consider it correct to allocate further employment sites in Green Belt, therefore do not support sites mentioned.	70/8210	Fulford Parish Council

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Question 11 continued			
	a) Agree. b) Approach correct but foundation on which it is based is incorrect, given that ability of York Central/Northwest to provide spaces required is fundamentally wrong. c) Agree. d) Should assist.	198/7288	The Helmsley Group
	a) No. Very optimistic. b) Yes if they are required. c) Agree with statement.	218/7405	Northern Gas Networks
	a) Whilst necessity for continued economic success is fully appreciated, no evidence to indicate that scales of development envisaged in Table 3 are deliverable whilst, at same time, safeguarding special character and setting of City. RSS states that economic growth of York will be delivered without detriment to the historic and natural environment of the City. However, at present, no mechanisms in place to assess whether this is likely to be achievable. Environmental capacity study suggested earlier would help to ensure that economic growth is delivered in a manner compatible with preservation of environmental character of York. c) Given that Council has yet to set out what it considers to be elements which contribute to special historic character and setting of York, not possible to determine to what extent loss of currently open areas at Hull Road and Northminster Business Park might impact upon Green Belt in those areas or character or setting of City. Unclear how peripheral development on eastern side of York can be reconciled with statement, in Policy CS1, that "<i>areas ... which provide an impression of a historic city situated within a rural setting</i>" should continue to remain open in order to safeguard special character of York. In respect of Area C, note comments of Green Belt Local Plan Inspector: - "<i>Since the construction of the Ring Road views from that road are of especial significance ... I consider that in general there would be serious harm to views of the city from the Ring Road if development were permitted to come right up to it.</i>" d) Policy CS10 will help to enhance York's economy and increase benefits to those who live in and visit City. However, should identify types of areas/activities where cultural/leisure/tourism product will be enhanced and where, spatially, this might occur across City.	242/7431	English Heritage
	Will all of proposed 336,134 Sq Metres of new employment land be allocated or will some come through windfall too? Neither Terry's nor Nestle south were included in growth forecasts. Will need to ensure future foul and surface water discharges remain as existing.	320/7453	Yorkshire Water

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Question 11 continued			
	d) Concentration of cultural facilities and activities can act as a magnet for visitors and provide a significant boost to local economy. Cultural services and tourism are inter-dependent, with tourists attracted by museums, theatres, heritage sites, arts, sport, entertainment venues, festivals and events. Previous document mentioned development of a cultural quarter for York but does not appear in Preferred Options. Policy is too general and not locally distinctive. Without more specific guidance it would be difficult to draw up meaningful indicators and targets to monitor and measure over time success or otherwise of strategy for culture, leisure and tourism. One of four bullet points states that Council will strongly support 'the establishment of a more diverse evening economy'. How will this be done? Notwithstanding production of City Centre AAP, policy should set out scale of development or improvements envisaged with AAP focussing on how proposals will be delivered.	324/7469	The Theatres Trust
	a) Definitely not. Level of job growth identified far too high and unsustainable. b) Suspect over-provision of sites as projections are unrealistic due to economic downturn and unsustainable at that level of growth. c) Reservations about designating these sites: - Designation is based on model of excessive economic growth; don't believe needed and if are will represent damaging level of growth; Designation in existing draft Green Belt as areas for development could encourage applications to bring them forward ahead of designated time; Site I is not a sustainable location. Its situation in vicinity of proposed new park & ride is not an argument in its favour as an employment site. Will encourage additional traffic in an area which will already be suffering from higher levels due to park & ride; Site C would have similar features and take infill development right up to ring road. A trend, which should be avoided. d) Yes, CCAAP may support these ambitions. However, LDF could mitigate against interests of residents and visitors if unsustainable targets or growth are pursued. Should also be looking at opportunities for certain kinds of manufacturing employment, specifically in environmental industries. Understand that some work is being done under heading 'Green Jobs Taskforce'. Whilst welcome this work, still a need for greater focus on opportunities for a manufacturing element. LDF should reference this work.	458/7628	York Green Party

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Question 11 continued			
	a) Yes. ELR Final Report is supported on basis that it recognises benefits to City in retaining North Selby site for potential alternative uses. Also supports inclusion of all types of jobs (rather than just 'B' use classes) within job growth projections. Recognition of importance of Science City York's role is welcomed. Supports recognition of North Selby Mine as being well suited to development of green technologies such as renewable energy. Should also recognise potential of North Selby Mine site for use as a bio-renewables centre for research, technology, demonstration, commercial activities and education relating to biorenewables. This would include uses such as R&D offices and laboratories/light industrial/education and conference uses and ancillary small-scale retail use. b) Necessary to ensure adequate supply of employment land available in a range of locations across City of York area. c) No comment on Areas C & I. However North Selby site is suitable for industrial employment uses related to use of site as Biorenewables Centre and should be identified as such.	515/7501	UK Coal Mining Ltd
	Figure used for amount of predicted jobs does not meet with anticipated growth for York. Must therefore provide sites accessible to adequately meet demand. C is better strategically located, however other sites must be included meet predicted growth. Suggest site at land situated off A19/A64 interchange at Fulford. (See representation for site-specific information).	568/7715	The Land and Development Practice
	Employment Land Review is predicated on a false assumption, which renders it not in conformity with RSS. It seeks to deliver employment land allocations that are less than 30% of those envisaged through RSS. On basis of Table A7, needs to provide an additional 91ha employment land. LDF has to reflect ambition of RSS. Unacceptable for review to decide to adopt a different forecast, as that would undermine policy objectives of RSS as a whole. Review's conclusion to discard RSS forecast in place of a forecast which disregards intended beneficial outcomes of policy and interventions under RSS, cannot be said to be taking into account material set out in Section 11 of the RSS as is required by RSS Policy E1A. RSS forecasts are policy-driven and key messages have to be recognised in Local Review, not rejected in favour of a different approach. Accordingly, whole section needs to be reformulated.	606/7767 610/7790	Jennifer Hubbard Mr G E Wright
	Additional comments to above: - North Selby Mine site is suitable for a wide range of employment uses and lies within a sustainable commuting corridor. Its future use should not be restricted in manner proposed. Area of Search C is preferred to I. Better related to built up area of city/established housing areas; would have less landscape/visual impact; is better related to University and regional highway network and would be consistent with "linear expansion between green wedges" approach. Provision should be made for expansion of established businesses on rural employment sites	606/7767	Jennifer Hubbard

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Question 11 continued			
	Local air quality must be a key consideration in planning growth. A low emission approach will help to ensure that economic growth can take place without unacceptable impacts on local air quality. Maintaining good air quality is essential to support growing tourist industry. Encourage development of North Selby Mine as a site for potential renewable energy production as long as activities on site would not be detrimental to local air quality in immediate area or beyond. Should identify at early stage how energy produced on site could be used to support a LES. Important that land contamination is considered when planning future developments.	2291/7826	CYC Environmental Protection Unit
	Layorthorpe, York City Centre, Monk Cross, Land North of Hull Road, York Central, Terry's, Nestle and Heslington East are considered to have a significant impact on SRN. Further consideration of these sites should take into account following statement: - “A development of this size and in this location would have a significant impact on the Strategic Road Network, which would require mitigation. Improvements to the SRN are considered only as a last resort. Instead a range of sustainable transport options for people using the development needs to be developed through the use of travel plans.” Would like to be involved in future analysis of clusters of potential sites to ensure that potential cumulative impact of sites is fully analysed at later stages. A1079 Grimston Bar improvements relate to an extant planning consent and should not be assumed that these obligations will mitigate LDF aspirations or be in place before LDF proposals are being developed. Suggests that A64 link between Grimston Bar and Hopgrove is stressed at present in AM peak. Cannot be expected to cater for unconstrained traffic generation by new development proposals. Such growth would be unsustainable and restrict opportunities for future development. Implications of employment development in areas of search on A64 need to be thoroughly evidenced and mitigated to be accepted.	2434/7849	Highways Agency
	b) Difficult to make an informed assessment as answer largely lies in result of ongoing evidence base work. Right number of sites in right location is clearly dependent on deliverability of those sites. c) See response to Question 3 (d) (Ref 2500/7863).	2500/7866	Northminster Properties
	c) Concerned regarding selection of Area C and I. Consider Land adjacent to the A1079 more suitable. (See representation for detailed site-specific comments) d) Needs to refer to supply of a range of accommodation in a variety of locations throughout City, which are accessible by a range of transport modes. See comments on Policy CS1 (Ref 2157/7907).	2517/7908	Lands Improvement
	a) Level of Job growth identified in Table 3 seems to be less than that identified in RSS. b) Need for flexibility to ensure needs of a changing market can be met.	2523/7920	Grantside Ltd

Section 11: Future Economic Growth continued

Paragraph etc	Comments	Ref.	Name
Question 11 continued			
	a) No. Need to plan positively to maximise delivery of employment over plan period. ELR predates RSS so should plan in accordance with economic growth aspirations in RSS. b) Proposed allocation of 50 ha employment land over period 2006-2026 is neither ambitious nor forward thinking enough. RSS states York should identify an additional 90ha of land for industrial, storage and distribution uses in period 2006-2021 whereas ELR identifies a need to deliver an additional 49.6 ha of land to 2029. ELR identifies clear need based on current indicators whereas RSS figure is aspirational and is the one which Council should plan for. Should be proactive in ensuring sufficient employment land is made available. Bearing in mind PPG2's requirement for sustainable and lasting Green Belt boundaries to be set, especially important to be ambitious when identifying employment land, while unimplemented allocated allocations can be carried forward to future plan periods. Should identify at least 90ha of employment land. c) Site I provides greater potential for development. Understand Site C Land at Osbaldwick is subject to various archaeological constraints, which effectively rule it out as an option. Furthermore it provides a strategic Green Belt function as a gap between edge of urban area and A64 bypass/ ORR; consequently provides setting on a main arterial route into City Centre. d) Appropriate and can be supported.	2527/7951 2528/7975 2537/7999 2688/8023	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	c) Area of Search C (North of Hull Road) is considered appropriate for employment only.	2542/8087	Moor Lane Consortium
	c) Support Site C (North of Hull Road) for a wider mix of employment uses (in addition to light industrial and distribution) to include B1(a) and others. The "safeguarded land" adjacent to Grimston Bar park and ride should also be identified for a wide mix of employment uses.	2687/8124	Tangent Properties

Section 12: Retail Growth and Distribution

Paragraph etc	Comments	Ref.	Name
General			
	Links with the Historic City theme and City Centre AAP needs expanding.	1/7106	Government Office
	Failure to increase market share does not preclude existence of a vibrant retail sector at current or slightly above existing levels, maximising particular attractions of City without adverse environmental consequences. Over development at Castle Piccadilly would make potential additional badly needed public open space in City Centre impossible to achieve.	52/8334	York Environment Forum
	Coppergate proposals seem to represent an “all eggs in one basket” approach as vast majority of retail targets are on this one difficult site. Whilst acknowledged that York should not lose its intimate historical character of city centre, a more adventurous approach to the adaptation of city centre buildings could be taken. More beneficial to retain historic nature (façades) of city centre but give the benefit of more modern floor plates to attract high quality department stores. Risk that if shopping facilities become spread across city centre, shoppers could take a disparate approach to purchasing, minimising spend. Could Hungate be reviewed to potentially deliver these schemes in short term thus protecting historic buildings around eye of York but permitting development of Piccadilly area? Could potentially lead to a cultural quarter or central park theme in Coppergate area. Should a retail scheme at Hungate progress, it would not only retain York’s historic core niche feel but create a natural extension to existing retail quarter of York.	57/7216	York Property Forum
	Supports intention to enhance retail provision in York as will strengthen city's role as a sub-regional centre. Recommendations of Retail Study state, extent to which York is able to 'claw-back' lost spend in its catchment area is dependent on policy choice. As such there may be potential to pursue a higher target, particularly through development at York Northwest.	479/7747	Yorkshire Forward
Introduction			
Paragraph 12.1	Disagree with basic premise. Need to maintain viability of city centre as a shopping destination but unlikely to be achieved by extensions to retail area. May have opposite effect, especially in a recession. Fails to consider role that enhanced Newgate Market could play in provision of convenience retailing and in attracting 'market share'. No discussion of investment in Market or its expansion or relocation, or of desirability of permanent markets selling local produce.	458/7629	York Green Party

Section 12: Retail Growth and Distribution continued

Paragraph etc	Comments	Ref.	Name
Context – Local Issues			
Paragraph 12.4	Retail Study heavily criticised. York should not seek to increase market share by building more floorspace for comparison goods. Will only create greater competition in a shrinking economy. Increasing number of modern retail units is not desirable as may lead to displacement and existing shops in traditional shopping streets becoming void. Will destroy independent retail sector if these are only shops remaining in those depopulated streets. Should expand and develop Newgate Market to include Parliament Street, which would enhance existing retail offer without competing with it.	458/7630	York Green Party
Paragraph 12.5	Castle Piccadilly should not be used for an extension to retail area. Could encourage existing retailers to move to Piccadilly leading to more empty shops in traditional heart of city. Could have a damaging effect on streets in Historic Core if vacated properties remain empty for any length of time. Castle Area should be developed as public open space, a leisure area joining Rivers Foss and Ouse. New visitor attraction e.g. replica Globe Theatre would be welcome. Stonebow may be more appropriate for retail development if Hungate development continues.	458/7631	York Green Party
Figure 14	Should be titled “Existing Centres and Proposed Retailing” as it also includes opportunities for new retail development, as well as identifying existing city centre and district centres. Identifies potential for a new local centre on York Central, as part of York Northwest. Figure should illustrate potential for major retail including foodstore provision, possibly as part of a local centre alongside housing, on York Central.	214/7337 621/7383	Network Rail National Museum of Science & Industry
Paragraph 12.6	If York Northwest were developed, would be requirement for convenience stores to meet needs of new residential element. Agree York Northwest must not be developed as a new shopping destination in competition with city centre.	458/7632	York Green Party
Paragraph 12.7	Support statements in respect of convenience retailing.	458/7633	York Green Party
The Preferred Approach			
Paragraph 12.09	Fundamentally disagree with desire to expand retail to seek to achieve a 34% market share.	458/7634	York Green Party
Paragraph 12.10	Disagree should be major extensions to retail centre. Some retail at York Northwest and along Stonebow acceptable if these go ahead.	458/7635	York Green Party
Paragraph 12.11	As believe Retail Study is flawed, disagree with approach to increase convenience retail stores. Better and more sustainable solution is to support unique pattern of small independent retailers and expanding Newgate Market. Supports statement relating to Local Service Centres, villages and parades of shops in suburban areas.	458/7636	York Green Party
Strategic Objectives	Seem to address appropriately need to retain retail in city centre. Important that privately owned shops in centre are supported to preserve character and individuality of retailing.	70/8211	Fulford Parish Council

Section 12: Retail Growth and Distribution continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Strategic Objectives continued	An additional objective should be added at top of list: - “Accommodating identified retail floorspace need sustainably” . Current first strategic objective should be redrafted to better reflect national planning policy guidance in PPS6 and Draft PPS4, to read: - “Ensuring that any new shopping provision does not unacceptably impact upon the vitality and viability of the city centre”. Add to last objective, for clarification: - “...and any new local centres” .	214/7338 621/7384	Network Rail National Museum of Science & Industry
	More clarity is needed over which parts of York Northwest are being referred to in bullet point 5. Needs to be made clear that retail provision at York Central is distinct from provision of smaller local centres on other parts of York Northwest Site.	479/7748	Yorkshire Forward
Targets	These are unachievable in current economic climate and unsustainable. Should be reduced.	458/7637	York Green Party
Policy CS11	Strategic policy to guide allocation of future retail development in Allocations DPD and AAPs. May also need a criteria-based policy in core strategy for handling applications, if PPS6 and RSS are not sufficient.	1/7107	Government Office
	Retail Study confirms that extent to which Council should seek to “claw back” lost spend is a policy choice to be made through LDF process. Having regard to role of York in sub-region, as a key driver of LCR within RSS, more appropriate to aim for an increased share of 37%. Recommend a figure of 37% should be included within Policy rather than the 34% quoted. Reference to complementary retail uses is inappropriate at this stage, as nature of any future retail uses on site will be determined through future testing. Nature of retail provision on York Central should be assessed having regard to Retail Study, further work commissioned by Council, which is currently underway, and emerging national policy in Draft PPS4.	214/7339 621/7385	Network Rail National Museum of Science & Industry
	Rise in market share to only 34% too cautious in recognition of current inadequacies of retail infrastructure in York, prevailing competition for superior locations outside York and falling market share in City. More sustainable to achieve a higher level of retail growth and trade retention. Should be seeking an improved market share and at least seek to achieve that achieved in 2000 of 37%. However, to address role of York as a Sub Regional City, as set out RSS, and given scale of York and its population, even that is low. Should seek to plan for high level of trade retention within City in view of overriding sustainability agenda of Government Policy. RSS Policy seeks to protect and enhance historical and environmental character of York, consequently there are number of development constraints in City Centre. Limited opportunities for additional floorspace in City Centre itself, so Policy should seek to increase market share of York as a whole. City Centre should be principal destination for retail development, however unable to accommodate identified need, and whilst edge of centre sites should be second preference are limited in terms of availability and suitability.	370/7486	Trustees for Monks Cross Shopping Park

Section 12: Retail Growth and Distribution continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS11 continued	District Centres of Acomb and Haxby provide services and facilities at local level. Not suitable to accommodate higher order retailers and unable to meet identified need set out in Retail Study. As identified in Retail Study necessary to identify areas outside City Centre to enable retail growth to maintain and enhance market share. Castle Piccadilly site is located in an environmentally sensitive area with historic surrounding land uses. A number of applications for retail development on the site have failed to obtain permission, which demonstrates that there are significant constraints. Retail Study identifies Castle Piccadilly as first priority major development opportunity site in City Centre, but recognises that site has proven difficult to bring forward and suggests, given strong forecast for retail growth, it should not hold up development elsewhere. York Central site is situated in an out of centre location and forms part of York Northwest. AAP identifies provision of retail uses as an objective although does not set out quantum of floorspace. Also identifies a number of constraints and states that aim is to deliver development over next 15 - 20 years. This demonstrates that above sites are unlikely to be available in first part of plan period. Policy should include explicit policy recognition of appropriateness of established retail destination at Monks Cross, to meet retail needs that cannot be accommodate in York City Centre. (See representation for supporting site-specific information for Monks Cross Shopping Park).	370/7486 continued	Trustees for Monks Cross Shopping Park continued
	Happy to note that designation of Clifton Moor or Monks Cross as District Centres is not a preferred option. Support Policy, which seeks to direct further convenience retail floorspace to York City Centre, followed by Acomb and Haxby District Centres and other smaller centres.	437/7492	WM Morrison Supermarkets PLC
	Heavily flawed. Seeking 34% market share not supported. Central shopping area requires consolidation, not expansion. Investment and growth should be targeted on Newgate Market and Parliament Street. Castle Piccadilly should not be considered for retail. Stonebow and York Northwest may be appropriate for some retail if housing developments go ahead. Support element of policy dealing with district, village and suburban retail.	458/7638	York Green Party
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations.	525/7529	Associated British Foods plc
	See response to Section 5 General (Ref 606/7759).	606/7769	Jennifer Hubbard
	See response to Section 5 General (Ref 610/7780)	610/7792	Mr G E Wright
	Further major convenience goods retail development should be directed to eastern area of city to address an identified deficiency, rather than only a continued focus on city centre and existing district centres.	2687/8125	Tangent Properties

Section 12: Retail Growth and Distribution continued

Paragraph etc	Comments	Ref.	Name
Question 12			
	Developments such as shops and services, which generally involve modern buildings with large amounts of floor space, offer an ideal opportunity to incorporate green roofs/walls, sustainable drainage techniques, and other elements of sustainable design. Including features such as these into developments helps to meet the requirements of PPS9.	4/7132	Natural England
	Supports Natural England's suggestion that retail buildings can be ideal for enhancement for biodiversity with features such as green roofs/walls and SUDS.	49/7192	Yorkshire Wildlife Trust
	Do not support retail growth at expense of setting and character of historic buildings in city centre. Castle Piccadilly encroaches on setting of Cliffords Tower, which is essential to keeping city attractive to tourists and residents alike and additional retail areas should respect setting of this landmark. Site would benefit from more green open space.	70/8212	Fulford Parish Council
	a) York: is more than a sub regional shopping centre. It is a regional shopping centre, given its special historic interest and should be aiming to make it such. b) Castle Piccadilly and Stonebow area are suitable areas for new shops. York Central is not; this is a residential district with a limited amount of shopping. c) District centres should include places such as Monks Cross and Clifton Moor. These are shopping centres not in York Centre but effectively suburban retail pitches, which are rapidly taking over from City Centre for general shopping purposes, but not tourist market.	198/7289	The Helmsley Group
	Piccadilly side of Castle/Piccadilly site suitable for shops, but not Castle side.	203/7300	Ms J Hopton
	b) York Central is one of two most appropriate sites for large-scale retail development over forthcoming LDF period. Appropriate to seek to accommodate identified retail floorspace on this site.	214/7340 621/7386	Network Rail National Museum of Science & Industry
	a) Agree with statement. b) Agree with statement. Sites presented meet requirements. c) No only Haxby and Acomb. Bishopthorpe and Copmanthorpe are too small.	218/7406	Northern Gas Networks
	Essential to economic well being of York that retail sector of City Centre continues to thrive. Core Strategy intends to increase market share achieved by City Centre to 34% (although not clear what this is 34% of). Equates to an increase of almost 110,000sq metres by 2029. Given recognition, in Paragraph 12.6, of limited opportunities for new retail development in city centre as a whole, is this scale of development achievable on sites detailed in Policy CS11? What evidence is there that environment of City can accommodate this scale of development?	242/7432	English Heritage
	As a strategic document not clear if whole of Castle Piccadilly should be for retail use. Has cultural and residential potential as well. Shopping as part of visitor offer strongly endorsed.	373/8224	Visit York

Section 12: Retail Growth and Distribution continued

Paragraph etc	Comments	Ref.	Name
Question 12 continued			
	Welcome and support approach taken in spatial objectives. However, policies on retail growth and distribution unsustainable and focus too much on providing retail development within historic core of City Centre; in particular development around Castle Piccadilly area. Large-scale development there for retail inappropriate to historical context of surrounding buildings including Cliffords Tower and York Castle. Existing transport infrastructure of City Centre suffers from under capacity at peak times, particularly around Castle Piccadilly area. Given historic nature of area, limited scope for improving capacity, and scale of additional floorspace proposed for City Centre will only exacerbate existing problem. Larger proportion of future growth should be directed to existing centres of Acomb and Haxby and York Northwest area enabling York to increase overall market share in a sustainable manner, by providing retail provision where need identified in recent Retail Study. Identifying Clifton Moor as a District Centre will help secure its future for providing wider retail and leisure facilities.	449/7493	Tesco Stores Limited
	a) No. Amount of growth is not viable or sustainable. Some locations are also inappropriate. b) Location of Castle Piccadilly for new retail development unacceptable. Stonebow and York Northwest may be appropriate for some retail if housing developments go ahead. c) Support district shopping centres at Haxby and Acomb, however village and suburban retail is also important for sustainable communities. Support progressing work on local shopping centres and retail parades. This should be seen as key part of economic development strategy as well as spatial plan.	458/7639	York Green Party
	Recognise that centre of York plays an essential role in retail, however McArthur Glen has potential and provision to continue to grow, without impacting on inner city retail sector. Policies should not hinder or restrict any future growth. Retailing peripheral to city centre with appropriate transport links will support and enable growth in up market retail activity in city centre itself. Provision of large retailing activity would be appropriate at A19/A64 interchange as a form of enabling development supporting provision of a new sports stadium facility, need for which has been clearly identified.	568/7716	The Land and Development Practice
	Support further retail growth in city centre but only under conditions outlined in response to Question 5 (Ref 2291/7816).	2291/7827	CYC Environmental Protection Unit

Section 12: Retail Growth and Distribution continued

Paragraph etc	Comments	Ref.	Name
Question 12 continued			
	a) While support aspirations of policy more support should be given to enhancing provision across City.	2527/7952	Diocese of Ripon and Leeds
	b) Support should also be given to small-scale proposal or parades in association with existing and proposed employment and residential locations.	2528/7976	The Ellerker Family
	c) Queried definition of District Centres in Spatial Strategy and this requires clarification. Clarification also required of role of Clifton Moor and Monks Cross which both have significant convenience shopping elements. Aside from Haxby and Acomb there are numerous local parades of shops that serve local day-to-day needs. This should be acknowledged in Policy. Definition of District may be too onerous. Should undertake an appraisal of shopping parades across city and identify a larger hierarchy, which acknowledges role of smaller centres.	2537/8000	Lancaster; Philiskirk & Sons Ltd; Burneston Family
		2688/8024	D Barstow Esq.
	c) Potential for new district centre should be considered to serve east of city.	2687/8126	Tangent Properties

Section 13: Sustainable Transport

Paragraph etc	Comments	Ref.	Name
General			
	Existing and future transport infrastructure should be part of infrastructure plan. Will need to be able to show how this provides a steer for the development of places. Need to be able to show which options perform best in relation to existing/deliverable transport infrastructure as part of the audit trail in the SA.	1/7108	Government Office
	Improved access to Scarborough and East Coast is recommended, but no mention made of what could be potentially of far greater significance, improved connections to Hull and the East Riding, and through Hull to the continent. Appears to have been no interest in exploring what these benefits might be, as Council appears to turn its back on a "gateway to Europe" waiting to be exploited, and prefers to concentrate on being a junior partner in a Leeds City Region. Appears to be unwarranted reliance on highly problematic tram-train connections to Leeds via Harrogate, intended to service the proposed "business district" at York Central, and new Haxby Station. Both would rely entirely on private operators, whose financial priorities may not coincide with those of the Council.	52/8335	York Environment Forum
	Note that LDF will support York's role as a world class centre for Further and Higher Education. Includes supporting ongoing development of Heslington East. This has and will have a major impact on local area particularly in relation to transport. Note that York's LTP identifies traffic congestion and its associated air quality and safety problems as single most important issue facing city and yet University appears to be allowed to defer its commitment to provide a UTS.	56/7208	Heslington Parish Council
	Will be pleased to contribute to discussions on this and to actively promote these and other transport facilities to prospective visitors. Quarter of visitors use train to get to York at moment and 10% use coach services so coach facilities are important. Sustainable transport is a critical issue outside city centre as well. Inconsistent public transport provision adversely affects a number of accommodation providers and attractions that would otherwise be more readily enjoyed by visitors without cars.	373/8225	Visit York
	Supports measures that will improve access to existing facilities and services, including employment, retail and leisure opportunities by foot and bicycle and through improvements to public transport networks. Important that new development is focussed in most sustainable and accessible locations to minimise need to travel. Suggest that public transport accessibility criteria set out in RTS are used to determine this.	479/7749	Yorkshire Forward
	Aims to increase retail market share and visitor income depend significantly on attracting visitors to York, many of whom will travel by car, which will conflict with stated aim of reducing number of car journeys. There will also be limits to how far this can be achieved as alternative means of transport will not necessarily be available and will also depend on ability or willingness of private operators to provide such services.	2691/8167	I Rowland

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
Introduction			
Paragraph 13.1	The issues in the first sentence should include “and reducing carbon dioxide emissions”.	458/7641	York Green Party
Context - Policy Context			
Paragraph 13.3 - 13.4	Support 2 nd and 3 rd bullet points. The objective to improve access between York and the East Coast should be focussed entirely on public transport or it will increase traffic levels. The major omission is an objective to significantly reduce traffic levels during plan period. Greater connectivity between urban areas in Leeds City Region should be focussed on public transport.	458/7642	York Green Party
Context - Local Issues			
Paragraph 13.5	Should include significantly reducing CO2 emissions and reducing overall traffic levels. Do not support measures regarding outer ring road as are inconsistent with strategic objectives, a waste of resources and will produce negative consequences. In paragraph after Table 4, text in parentheses should be removed since consultant’s costings have shown no cost benefit justification for dualling of road.	458/7643	York Green Party
Table 4	Any improvements identified need to be realistic and have an agreed funding source. If infrastructure improvements are considered to be critical to delivery of LDF, and do not have a realistic funding source, document will be considered unsound. Would like to understand how improvements outlined will be funded. Particular concerns about funding of Tram-Train initiative and York/Beverly rail line. Would like more information on freight centre on outskirts of York, to assess potential implications on SRN. Is proposed centre to serve as a consolidation centre for inward goods to York or an outward distribution centre for a wider area?	2434/7850	Highways Agency
	Cycling and Walking 1 st Bullet point mentions expansion of secure cycle parking. Should be expanded to read after “secure cycle parking” – “ at public and employment sites... ”. This is to underpin a real need to encourage businesses to make suitable provision on their premises, to further encourage modal shift from car. 2 nd Bullet point mentions footstreet expansion. Further paragraph should be added as follows: - “A presumption will be made to retain 24/7 cycle access in any additional streets where motor vehicle access is restricted. This accords with the guidance given by the DfT in Local transport Note 2/08 (issued October 2008) para 4.3 Vehicle Restricted Areas. This is reinforced by Cycling England guidance A.07. Consideration will be given to relaxation of cycling restrictions on a selective basis, in the existing vehicle restricted central area, to create one cross city cycle route with 24/7 access”.	2611/8100	CTC North Yorkshire

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
Context - Local Issues continued			
Figure 15	City Centre inset should be extended to include York Railway Station, and existing bus and taxi interchange at front of station, given their importance to local transport issues.	214/7341 621/7387	Network Rail National Museum of Science & Industry
Context - You Told Us			
Paragraph 13.7	Question conclusion in 1 st bullet point. Surely some people said some measures should go forward and not others. Not possible to conclude there was general support for all measures in LTP2. 4 th bullet point should simply state that 'twice as many responses opposed dualling outer ring road as supported idea.	458/7644	York Green Party
The Preferred Approach			
Paragraph 13.10	Support proposals for tram train. Would like to see proposals as part of wider network including Harrogate Line and link to Leeds/Bradford Airport. However, if proposal proceeds in isolation wish to ensure that impact of development on operation of Harrogate Line would not reduce level of service nor reduce ability to undertake improvements to service frequency or infrastructure on this line, particularly ability to provide dual track along existing single track sections and possible halts at Knaresborough East and Bilton Harrogate.	15/7165	Harrogate Council
Paragraph 13.8 - 13.10	Objectives too general, unquantified and targets are weak and unlikely to achieve objectives. Key actions and delivery mechanisms are mostly long term and insufficiently radical to stem growing incidences of congestion and air quality levels. Support comments in Sustainability Appraisal that road improvements must be queried, as short term reductions in congestion are likely to be lost in long term through rapidly increasing car use and increased emissions. Cuts in public spending likely to undermine prospects for Tram train. Recession will delay development of York Northwest and impact on work on transport interchange near rail station.	458/7645	York Green Party
Strategic Objectives	Include "To significantly reduce traffic levels over the plan period as part of the city's Climate Change Strategy to reduce CO2 emissions and meet legal air quality limits."	458/7646	York Green Party
	Suggest inclusion of additional bullet points: - To reduce total emissions of carbon dioxide and oxides of nitrogen by limiting provision for private car parking and ensuring that priority is always given to low emission forms of transport. To encourage the continued uptake of low emission vehicles by encouraging the development of infrastructure needed to support them.	2291/7828	CYC Environmental Protection Unit

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Strategic Objectives continued	Concerned about objective “maximising the potential of potential rail station”. Any transport infrastructure critical to delivery of development must be deliverable. Unacceptable to allocate development on basis of a potential rail station, without an identified source of funding and delivery mechanism.	2434/7852	Highways Agency
Targets	Inadequate and inappropriate. Targets 4 & 5 are far too low. Target 6 is unacceptable and contrary to strategic objectives should be to significantly reduce traffic levels in peak period and overall, not just to reduce level of growth. Final target (why isn't it no.7?) is also inappropriate. Reduction of car journey times should not be measure. Freed up road space will only be filled by more cars. Key measure has to be traffic reduction & modal shift away from car. Target reduction in bus journey times at peak periods would be a more appropriate key measure than car journey times.	458/7647	York Green Party
Policy CS12	Needs to be firmer, particularly where transport improvements are required to ensure delivery of other parts of strategy. Deliverability needs to be much more up-front, with consideration of whether there is a need for fallback scenarios.	1/7109	Government Office
	Support. Believe this will reduce traffic congestion and reduce reliance on the private car.	5/7152	Environment Agency
	See above response 15/7165 paragraph 13.10	15/7164	Harrogate Council
	Welcomes consideration given to re-opening of the Beverley to York rail line. Trusts this will continue to be included as a firmer policy approach is developed and that the route will be safeguarded when allocating land through the Allocations DPD.	17/7167	East Riding of Yorkshire Council
	Note reference within “parking” bullet point to fact that number of car parking spaces available in city centre will remain broadly as they are now to protect viability of retail economy. Where new retail development is proposed including at York Central, sufficient new parking should be permitted, for exactly same reason - to maintain vitality of that retail development.	214/7342 621/7388	Network Rail National Museum of Science & Industry
	Makes only one reference to measures that might achieve RSS requirement to implement stronger demand management: Parking (up to 2011) first bullet point. Only other reference is to state that ‘the city currently has no plans to introduce congestion charging’. Whole section will need to be revised in light of forthcoming draft LTP3 and residents survey on Traffic Congestion scrutiny report. Public Transport: - Support reference to ‘Improvements to public transport infrastructure including major bus priority measures identified through the LTP3...’ Stronger reference should be made to LTP3 and need for this to develop measures which meet strategic objectives. Parking: - Appreciate only applies up to 2011, but concerned about 3 rd sentence in 1 st bullet point. Should set out principle that car parking spaces will reduce in direct proportion to development of new park & ride sites and introduction of bus priority measures.	458/7648	York Green Party

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS12 continued	Should also be a pricing policy that relates to transport strategy, inflation and relative cost of bus fares rather than simply need for council income from city centre car parks. Should be part of clear strategy for traffic reduction and enhancement of environment for walking and cycling across plan area. Policies on maximum parking levels, secure covered cycle parking provision, public transport infrastructure, car clubs etc in new developments must be maintained and enhanced in development control DPD. With exception of some bus priority measures (Malton Rd and Fulford Rd) and planned extension of park and ride services, little progress made towards strategic objectives under LTP2 and measures identified within it are unlikely to effectively achieve objectives required by other elements of LDF. To meet legal requirements of Air Quality Management Areas by 2010 stronger more effective action is required than has been set out in either LTP2 or this section.	458/7648 continued	York Green Party continued
	In addition to delivery mechanisms identified question whether there is potential to develop concept of trans-shipment sites around boundary of York, to reduce congestion associated with HGVs, and if this could be addressed in Core Strategy. Some concern about appropriateness of future development in vicinity of ring road that relies on these improvements taking place, or that relies on rail improvements, unless suitable funding regimes are identified. While some improvements to northern outer ring road are probably necessary to improve congestion, overall likely to be an expensive process for which only partial funding has been identified. While tram-train is an aspiration within Leeds City Region it does not yet have Network Rail support and no funding identified. Some doubts about economic viability of reinstating York-Beverley rail line. Need to consider implications for future development if not possible for all these projects to progress to completion.	479/7750	Yorkshire Forward
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations. Note reference to development of a tram-train initiative. However, no details of funding or associated timescales/programme. In absence of any indication of infrastructure needs and costs, phasing of development, funding sources or responsibilities for delivery, concerns regarding deliverability. Support Park and Ride initiative at A59 and enlargement of A59/A1237 roundabout, to help achieve wider sustainable transport objectives and improve accessibility of York Northwest. Term 'reducing congestion' at all seven roundabouts on York Outer Ring Road should be re-phrased to read: "measures to improve the management and control of traffic" .	525/7530	Associated British Foods plc

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS12 continued	Support of a LES should be added to list of supported measures. Statement on freight should be strengthened to support development of a freight centre rather than just identification of a suitable location.	2291/7829	CYC Environmental Protection Unit
	See response to Table 4 (Ref 2434/7850) re funding. Will only consider improving SRN to meet traffic generated by new development as a last resort, even if extra capacity is to be funded by private sector. Instead encourage developers to provide a range of sustainable travel options for people using their development through use of Travel Plans. Following text should be inserted into policy: - “Travel Plans are an integral part of the planning process and an essential measure to mitigate the impact of traffic generated by new development. A Travel Plan will be used as the foundation for a Transport Assessment prepared in accordance with the Department for Communities and Local Government/ Department for Transport guidance and it should be in conformity with prevailing guidance. Travel Plans should demonstrate a firm commitment by developers and occupiers to reduce the number of single occupancy car trips generated by, or attracted to, their site. They should set out mode options available to travellers, identify interventions to enhance the availability and capacity of sustainable transport modes (such as walking, cycling and public transport), set mode share targets based on those modes, identify a system for monitoring the effectiveness of the plan and a programme for reviewing and modifying it to ensure agreed outcomes are achieved. Working with the City Council the Highways Agency will advise developers how to prepare, implement, monitor, review and update Travel Plans to support their development and will consider tri-partite agreements with the Council and developers where appropriate. The Highways Agency has developed toolkits of Active Traffic Management and Integrated Demand Management, which can be used to regulate traffic on the Strategic Road Network. These interventions are preferred to capacity improvements. If after Travel Plan measures have been considered there is still a likelihood of traffic from development having a material impact, either in terms of safety or capacity, on the strategic road network then the cost of any improvements deemed necessary will have to be met by those developments materially contributing. Operational conditions on the strategic road network and its interface with the local highway network and the potential implications of new development will be kept under review and the most up to date information will inform decisions about proposals for development”.	2434/7851	Highways Agency

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach			
Policy CS12 continued	Approach in relation to Local Transport Considerations is supported especially in relation to proposed transport schemes and programmes identified in 'Access York' Phase 1.	2500/7867	Northminster Properties
	Support expansion of existing park and ride at Askham Bar. Growth at Moor Lane would be likely to contribute to better use of park and ride buses during day. Support development of Tram-Train initiative from York to Askham Bar Park and Ride. 'Access York' Phase 1 proposals will provide capacity benefits on local network that will reduce congestion and improve access to Moor Lane site. Public Transport - Potential future Askham Bar Park and Rail station/halt would be served by tram-trains. Whilst initial findings are likely to be insufficient demand to install a new dedicated track it would be possible to run a service on existing York-Leeds line. A new station/halt would have to be located on west side of lines, necessitating a footbridge for passengers. Station would be located within Moor Lane site creating an exciting opportunity for a multi-modal transport interchange to be integrated with proposed residential and employment development. Cycling and Walking - Development of Moor Lane site would provide opportunities to review existing pedestrian and cycle provision in the vicinity of site and provide enhancements to link in with any improvement schemes in area.	2542/8088	Moor Lane Consortium
Question 13			
	Should also ask which development options performed best in relation to existing and deliverable transport infrastructure, what improvements are needed to deliver the preferred options, are they sustainable, are they deliverable and what are the fall-back scenarios? The SA should help to provide the answers. A question of balancing aspiration with probability. Strongly support what is outlined under Delivering Sustainable Transport with some reservation on the relative priorities/financial deliverability of Tram train initiative, Haxby rail station and Re-opening of the York to Beverley ("Minsters") line.	1/7110	Government Office
	Recognises that maximising use of brownfield land such as Askham Bar Park and Ride location can ensure efficient use of land. However, PPS9 promotes retention and incorporation of biodiversity interest on previously developed land. Reference to ensuring that re-use of brownfield land is compatible with any on-site biodiversity interest would be beneficial. Support effort to reduce dependence on high carbon forms of transport. Encouraging more walking and cycling can also lead to increased contact with natural environment, particularly if links into green infrastructure are made. Less traffic will also make natural environment more appealing.	4/7133	Natural England

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
Question 13 continued			
	Supports proposals to reduce congestion and encourage use of modes of transport other than private car. Improving biodiversity on verges of footpaths and cycle paths will help to connect York residents with natural environment and create wildlife corridors.	49/7193	Yorkshire Wildlife Trust
	LTP emphasises priority of pedestrians and cyclists within transport hierarchy. To achieve this aim funding needs to be prioritised towards expansion of walking and cycle routes, taking into account diverse needs of both young and more experienced cyclists as well as pedestrians. Note that local transport considerations are mostly concentrated on northwest of York whilst most proposed developments proposed are on southeast. More consideration needs to be given to whether transport that ensues from proposed developments can be accommodated with transport considerations proposed. As regards Fulford, A19 runs through centre of historic linear village. Level of congestion in Fulford is highly detrimental to historic character and environment. Major developments are proposed along A19 such as Germany Beck, Barbican etc without sufficient thought on whether such traffic can be accommodated. Wish to discuss options to reduce use of A19 as a main entry route into centre from A64.	70/8213	Fulford Parish Council
	In general supports first bullet point in strategic objective. Specifically supports development of Haxby rail station.	164/7263	Hogg Builders (York) Ltd
	All comments seem fair.	198/7290	The Helmsley Group
	Should consider linking villages to York by cycle routes. Requests for cycle links from villages meet problem of only small populations benefiting. However, do have dual benefit of leisure routes, providing access to countryside for York residents. Buses cause congestion as too large. Frequent small electric buses should serve City Centre. Introduce river ferry (shuttle service) between Museum Gardens and Castle area/Tower Place.	203/7298	Ms J Hopton
	Agree with statement in principle. Using park and rides total cost should be significantly cheaper than other parking alternatives.	218/7407	Northern Gas Networks
	Overall, broadly support measures. However: - Transport strategy should be not simply to reduce congestion but, rather, to reduce adverse impacts which all forms of transport might have upon environment; Should be attempting to ensure that size of public transport vehicles used are appropriate for character of historic city. Some of larger buses are too large for essentially, pedestrian scale of City's streets; Several measures have been put forward which involve development of physical infrastructure to encourage shift to more sustainable forms of transport. However, no assessment of impact these measures might have upon character and setting of York. Particular concerns about impact of proposed Park and Ride site north of the Ring Road at Poppleton.	242/7433	English Heritage

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
Question 13 continued			
	Could lead to increasing urbanisation of rural setting of City, to detriment of its character; Strategy might explore potential of removing those car parking areas which have an adverse impact upon character of City e.g. Nunnery Lane and St George's Field; thought should be given to extending Footstreets to routes leading through City Bars e.g. Bootham, Micklegate etc. Would improve people's appreciation and enjoyment of historic city.	242/7433 continued	English Heritage continued
	No, is one of weakest sections in draft LDF. A great deal is missing. Does not support accessibility or tackle climate change which is an obligation in respect of York's Climate Change Strategy or Climate Change Act 2008. Also fails to provide a strategy to comply with Air Quality Directives within Air Quality Management Area and at locations like Fulford that may have been declared AQMAs by start of plan period.	458/7640	York Green Party
	Yes. Important to adopt a flexible approach and allow provision of a range of transport modes. Should recognise that provision of jobs in rural areas can lead to less congestion in City.	515/7502	UK Coal Mining Ltd
	Does not adequately address traffic congestion or other key transport issues as follows: - Consideration should be given to relocation of intercity rail link element of South York in a parkway form; Greater emphasis should be placed on redevelopment of rail link to areas in West and South Yorkshire, South Leeds and city itself using existing permanent way and facilities; Emphasis should be given to redirecting traffic flow away from city centre, rather than encouraging non-essential city centre activity access, by alternative transport links into centre.	568/7717	The Land and Development Practice
	Current measures outlined in LTP2 are not sufficient enough to deliver air quality objectives at all locations in city centre. Anticipated that LTP3 will address this by incorporating concept of a LES. This section should make reference to need to move towards use of low emission vehicles and development of low emission infrastructure.	2291/7830	CYC Environmental Protection Unit
	Emerging LTP3 will be a critical document in demonstrating deliverability of Core Strategy and should be reflected in this section.	2434/7853	Highways Agency
	Supports 1 st bullet point in Strategic Objectives. In respect of key actions identified, specifically supports development of Haxby rail station.	2524/7934	Barratt Homes (York) Ltd
	Proposals present a framework to enhance sustainability of York. Improvements proposed in York Northwest AAP to A59 need to be accorded weight. Policy should support proposals to improve highway or transport infrastructure in association with development proposals, which have not been anticipated within LTP2.	2527/7953 2528/7977 2537/8001 2688/8025	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.

Section 13: Sustainable Transport continued

Paragraph etc	Comments	Ref.	Name
Question 13 continued			
	Dualling of Outer Ring Road not supported and proposed major new development places further pressure on this route and is counter productive, placing additional stress on this part of city's highway network. Needs to support potential opportunities to enhance and improve public transport links throughout whole of city, particularly in east of city where little is offered by way of improvement. Suggested that opportunities need to be investigated which may offer, e.g. a new dedicated bus route into city centre from east, preferably linked to new residential and employment allocations.	2687/8127	Tangent Properties
	Support general principal of promoting more sustainable forms of transport to alleviate pressures on existing infrastructure.	2698/8244	Commercial Estates Group and Hallam Land Management

Section 14: Green Infrastructure

Paragraph etc	Comments	Ref.	Name
General			
	Should be a more explicit part of spatial strategy. Difficult to separate from Green Belt question, historic environment and location of development. More weight should also be given to the importance of views.	1/7111	Government Office
	Insufficient emphasis on rural environment, need to integrate green infrastructure within total built fabric, and adopt a major tree planting programme. Reasons for rejecting areas E and F include unsuitability of dense screen planting, as it is not a traditional feature of landscape. Fails to acknowledge that landscape is constantly changing, and inhibits what might otherwise be considered potential for development in rural areas. Draft Local Plan indicates area immediately to north of area I as being a recreational opportunity area. This is now being lost to P&R site. This is an example of loss of potential green public open space to development, which must be resisted.	52/8336	York Environment Forum
	Concur with view that York should retain and increase its green infrastructure. Locally only Walmgate Stray and the Tilmire (SSSI) are mentioned. However, Heslington also has other green spaces, e.g., Church Field and the field separating Windmill Lane from Badger Hill. Long gardens also contribute. Village also has green fingers such as Fulford Golf Course leading down to Tilmire and Boss Lane with its adjacent fields and allotments leading to The Outgang and beyond to Tilmire. Endorse view that, where possible, green corridors should be developed to allow easy movement for wildlife. Elvington Airfield falls within Heslington Parish and within the general extent of Proposed Green Belt. Hope that LDF will prevent inappropriate development at airfield, which impinges on Heslington and other villages and important nature reserves in the vicinity of airfield.	56/7207	Heslington Parish Council
	Should place additional emphasis on wider role of green infrastructure, including potential economic and social benefits, which would reflect guidance of RSS. Should identify further significant environmental, social and economic benefits that could accrue from creation, enhancement and protection of quality green infrastructure within York, e.g. the potential: - impact of tree planting on climate amelioration; economic benefits for landowners, e.g. through short rotation coppice; for community forests and other woodlands to be managed for wood fuel; to link green infrastructure provision to new public transport, including walking and cycling routes; to use green infrastructure for management of water resources; and to improve environmental setting for new buildings and thereby helping to increase property values.	479/7751	Yorkshire Forward

Section 14: Green Infrastructure continued

Paragraph etc	Comments	Ref.	Name
General continued			
	Does not mention whether trees should be included in housing or office developments. Including them would help in reducing pollution, providing shade/cooling, and contribute to biodiversity and green spaces. Including allotments and community gardens in developments will also help contribute to: - biodiversity and green spaces; increasing York's allotment stock to help meet current and future demand for growing own food (which helps reduce food miles and act as a local focus for community building); and helping compensate for a reduction in or absence of garden space in high density housing, especially flats.	2691/8168	I Rowland
Introduction			
Paragraph 14.1	After the 8 bullet points add: 'This quality of place links strongly to the historic environment and its pre-eminent role in shaping the character of the city, both in the past and in the future. See also Para 14.18 below.'	110/8312	York Civic Trust
	List should include “ agricultural and non-agricultural land for local food production. ”	458/7649	York Green Party
	Welcome outline of range of benefits, which can be provided by a well, designed, managed and integrated network of green infrastructure. Would like to see recognition of woodland as a key component of this.	569/7718	The Woodland Trust
Paragraph 14.2	List of should include “ Productive land ”.	458/7650	York Green Party
Nature Conservation Context - Policy Context			
Paragraph 14.6	Need to exercise caution using ANGSt standards. Accompanying Guide to PPG17 'Assessing needs and opportunities' states can be difficult and sometimes impossible to achieve.	525/7531	Associated British Foods plc
Paragraph 14.6 - 14.7	Support use of ANGSt model. Would also emphasise that same green/open space can be valuable for different reasons, not just as a measure of direct usefulness to human beings.	458/7651	York Green Party
Nature Conservation Context – Local Issues			
Paragraph 14.10	Audit and Action Plan crucial to assessing if this part of LDF is meeting local needs. Completed work should be incorporated into evidence base prior to this part of plan going forward.	458/7652	York Green Party
Open Space Context - Policy Context			
Paragraph 14.15	Include specific measure for retention of school playing fields in line with national policy.	458/7653	York Green Party
Green Corridors and Linkages			
Paragraph 14.19 - 14.21	Concerned about apparent weight being given to prioritising green corridors and linkages for protection. It is important to recognise that all existing green space within plan area is valuable and can contribute to biodiversity, local amenity, healthy living and/or local food production. Relationship with Green Belt and urban open/green space outside the corridors: - Delineating certain areas for stronger protection implies that protection accorded to valuable sites outside of corridors and linkages is weakened.	458/7654	York Green Party

Section 14: Green Infrastructure continued

Paragraph etc	Comments	Ref.	Name
Green Corridors and Linkages continued			
Paragraph 14.19 - 14.21 continued	Should be clear this is not case. Location of a site outside these designated areas does not per se strengthen case for development. Connectivity: - Connectivity between sites is crucial to wildlife (plants as well as animals). Although three largest “green corridors” are mentioned, many other smaller ones may be overlooked. Too easy, and too common, to narrow down a green corridor to point at which it ceases to be useable by wildlife. This must be avoided in detailed supporting documents. District & Local Corridors: - Level of constraint in these corridors should be strengthened. May be that some level of development may be acceptable, but if areas are identified as corridors then should be protected (as above under ‘connectivity’).	458/7654 continued	York Green Party continued
The Preferred Approach			
Paragraph 14.23	Add at the end 'These will include linkages to other strategies concerned with both the natural and the built environment'.	110/8313	York Civic Trust
	Support.	458/7655	York Green Party
Paragraph 14.24	Note and support Green Infrastructure Strategy SPD. Would expect valuable existing Green Infrastructure to be identified and safeguarded in Core Strategy, by steering development away from these areas or at least ensuring that when it does take place, that it is designed sympathetically to allow its existing multi-functionality to be retained and enhanced.	5/7153	Environment Agency
	Concerned that designation of green infrastructure assets under Allocations DPD could be used a justification for development on sites, which for some reason are not designated. Needs to be made clear this is not case.	458/7656	York Green Party
Paragraph 14.25	Support.	458/7657	York Green Party
Strategic Objectives	Add at the end: 'network' 'and as aspects of the natural and historic environment'.	110/8314	York Civic Trust
	1 st bullet point under Nature Conservation, word “priority” should be removed. Implies whilst some sites of conservation and bio-diversity value will be protected, others are dispensable. 2 nd bullet point under Open Space, words “where feasible” should be removed. This is vague and open to wide and undefined interpretation.	458/7658	York Green Party
	Support strong commitment to ensuring specific protection for ancient woodland, aged and veteran trees. Welcome increase in woodland cover.	569/7719	The Woodland Trust
Targets	Add at the end of last bullet point after ‘linkages’ – ‘and their relationship with other aspects of the natural and historic environment’.	110/8315	York Civic Trust

Section 14: Green Infrastructure continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Targets continued	Noted that Council is seeking a reduction in open space deficiencies identified in PPG17 study. Query whether this approach of addressing existing deficiencies through new development would meet all five tests set out within paragraph B5 of Circular 05/2005. Furthermore, Circular specifically notes that planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision. Council's approach therefore appears questionable.	214/7344 621/7390	Network Rail National Museum of Science & Industry
	Under Nature Conservation, following bullet point should be added: - "No loss or damage to existing green space unless very special circumstances can be proved." Division of targets into three categories given is not helpful. Green open space has other values, which do not fit into headings given. Targets should include: - • Retaining green/open space within urban area where it contributes to character and amenity value of a neighbourhood (whether or not it is accessible to public). • Protecting large gardens from overdevelopment. • Protecting and supporting designation of land for use as allotments. • Identifying sites for potential markets gardens in later stages of plan period. • Protection for good quality agricultural land.	458/7659	York Green Party
	Support strong commitment to ensuring specific protection for ancient woodland, aged and veteran trees. Welcome increase in woodland cover, although would prefer a more quantifiable target taken from RSS. RSS also contains a target based on Woodland Trust's Access to Woodland Standard stating: - "70% of the region's population should have one area of accessible woodland of no less than 20ha within 4km of their homes by 2021 and 20% of the region's population should have one area of accessible woodland of no less than 2ha within 500m of their homes by 2021." A specific target such as this would be more useful than rather vague commitment to: "an increase in accessibility to natural greenspace where appropriate". Currently only 6 % of people have access to a 2ha wood within 500 metres of their homes and only 46 % have access to a 20ha wood within 4km. This shows that significant improvements are needed in order to meet target in RSS, which could be achieved either by opening up existing woods which are closed to public or by new woodland creation.	569/7720	The Woodland Trust

Section 14: Green Infrastructure continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS13	An SPD may not be the right vehicle for the policy, since it cannot make designations. Wording of policy should give more direction about where new open space and green corridors will be located, with links to proposed distribution of housing and other growth. Happy for York to identify green corridors, but they need to be correctly labelled. This might be 'local green corridors' and 'strategic green corridors', but you cannot yet identify 'regionally significant green corridors'. This is because green corridors weren't identified through the RSS process and it is too early for them to have been identified through the RS process and therefore they are not yet of regional significance. Need to consult and work with Natural England and the LCR on developing these.	1/7112	Government Office
	Should be made clear that Green Infrastructure could have a dual use as flood storage areas – for river or surface water flows. Applies to existing Green Infrastructure and new proposed infrastructure. One of the recommendations of Sustainability Appraisal is that the Policy should reference Green Infrastructure in relation to its intention for green walls, roofs and soft borders. Green roofs can significantly improve the environmental performance of buildings by: - reducing the quantity of surface water run-off therefore helping to reduce the risk of flooding; improving quality of surface water run-off; improving air quality and reducing urban heat island effect; improving biodiversity; creating higher visual qualities. As green roofs will be on new developments, which require planning permission, a green roof policy will help give the planning department a stronger stance in requesting green roofs.	5/7154	Environment Agency
	Does not address potential harm, which might be caused to amenity of a locality through loss of an area of open space. Second bullet point should include a commitment to protect open spaces, which make an important contribution to amenity of neighbourhood. Criterion 8 should be amended along following lines: - "Protecting existing open space in York in areas where either a deficiency has been identified or where the open space makes an important to the character of the locality" .	242/7434	English Heritage
	Point 4, 2 nd half of sentence seems to weaken policy. Green infrastructure takes time to establish. A mature garden, traditional orchard, or ancient wood is a more valuable asset in the landscape than their new equivalents. Protection for these and other similar assets should be explicitly stated. It should be clear that 'mitigation' is a last resort to be considered only in very special circumstances. Point 6 is supported but should be strengthened. Onus should be on those proposing to remove mature trees to prove they represent any serious danger. A city wide Tree Strategy should be produced.	458/7660	York Green Party

Section 14: Green Infrastructure continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS13 continued	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations.	525/7532	Associated British Foods plc
	Welcome commitment to developing a citywide network of local wildlife sites, including corridors, stepping stones etc. Should include commitment to buffering and extending existing semi-natural habitats to increase their core area and reduce intensity of management of land in between semi-natural habitats to make landscape in general more permeable to wildlife and enable them to move and adapt to impact of climate change. A specific reference to climate change adaptation may be useful in giving further justification for need for a strategic network of green infrastructure.	569/7721	The Woodland Trust
	Provides a reformulation of definition of green infrastructure, which is not consistent with RSS.	606/7770 610/7793	Jennifer Hubbard Mr G E Wright
	Generally support approach. 1 st bullet point no. 4 use of "to produce a net gain in biodiversity" is ambiguous. Not clear how this would be measured and whether it would be necessary to carry out a comparison against baseline situation. Phrase is open to wide interpretation and should be removed. Policy should be reworded to "The City Council will support development which protects and enhances biodiversity" .	2542/8089	Moor Lane Consortium
Question 14			
	Wish to see further detail relating to adaptation to climate change here. Particularly important in relation to urban cooling, where street trees and green and blue space will play an important role, and in dealing with flooding, through the use of sustainable drainage systems. Approach to green infrastructure should: - support partners in planning and promoting resilience within greenspaces to the effects of climate change particularly in urban areas; provide widest range of opportunities for people of all abilities, ages, ethnic groups and social circumstances to actively engage in, value and enjoy the natural environment; recognise that access to green space should aid healthy activity; recognise that access should contribute to achieving the transition to a low carbon economy by encouraging sustainable leisure use.	4/7134	Natural England
	a) Value of Green Infrastructure is assessed thoroughly in this section. Mitigation of the effects of climate change could also be listed, e.g. the effect of green infrastructure on the 'urban heat island effect'. Maintenance of Green Infrastructure has financial implications and it is important that policies highlight ways in which money will be available to maintain and improve the city's assets. Training of city employees and contract workers in identifying and improving biodiversity can also be important so that for example grass is mowed at the right times of year, and hedges and trees are sympathetically managed. Policies are not useful if those who are carrying them out are insufficiently trained and resourced.	49/7194	Yorkshire Wildlife Trust

Section 14: Green Infrastructure continued

Paragraph etc	Comments	Ref.	Name
Question 14 continued			
	b) Increase in tree cover is mentioned and supported. Important that tree planting is done in appropriate places so other wildlife and habitat interest is not lost and tree species are carefully chosen so that they have biodiversity or food value. Trees planted now may still be alive in hundreds of years and their long-term value needs to be assessed. Could also decide on a particular standard of tree surgery, as the quality of work done on trees appears very variable. Hope that identified green corridors receive protection through planning process, so they have long term value.	49/7194 continued	Yorkshire Wildlife Trust continued
	b) Agree that green assets need to be protected. c) New parks and green corridors. A number of wards and parishes fall short of open space requirements and this should be a priority. Fulford is one of these. Green Infrastructure update shows green corridors identified so far. As it is an update on work in progress request that an analysis of specific areas of Fulford is carried out. Request assessment of following to see if could be added as green corridors, assets or open space: - Germany Beck corridor from where it discharges in Ouse to Walmgate Stray; Historic parkland around Connaught Court connecting to Fenby Field via private gardens; Private gardens along Ings; Verges of A19 between A64 and entry to historic part of village.	70/8214	Fulford Parish Council
	City needs more open green spaces. Flat dwellers have no gardens. Castle car park, down to river Foss, should be allocated as green space as lack of green open space at this end of city.	203/7299	Ms J Hopton
	a) In accordance with PPS12, evidence of what green infrastructure (as well as physical and social infrastructure) is needed to enable amount of development proposed for area should be included within Council's Infrastructure Delivery Plan. Would be wholly inappropriate to include this fundamental supporting evidence to Core Strategy within an SPD.	214/7343 621/7389	Network Rail National Museum of Science & Industry
	a) Agree. b) Agree with approach.	218/7408	Northern Gas Networks
	London Bridge site has potential to provide additional sports and open space facilities as identified in PPG17 Study.	282/7449	York College
	a) Introduction to section states that Green Infrastructure can have a positive contribution to drainage and flood mitigation. No further mention of this in objectives, targets or policy. Would be worthwhile to provide a target or guidance on how this could be implemented.	320/7454	Yorkshire Water
	No, multi-functional nature of green space is not adequately addressed.	458/7661	York Green Party
	a) and b) Yes. Whilst supporting nature conservation this needs to be balanced against economic and social needs. Protection and maintenance of green infrastructure should not prevent job creating development from going ahead.	515/7503	UK Coal Mining Ltd

Section 14: Green Infrastructure continued

Paragraph etc	Comments	Ref.	Name
Question 14 continued			
	b) Agree in general. The Trust's Access to Woodland Standard should be used as a means of measuring gaps in provision of access to woodland. Policy CS13 refers to requirement to carry out assessments of need for various types of open space. Annex to PPG17 clearly states that woodland is one of types of open space, which should be considered.	569/7722	The Woodland Trust
	Whilst no objection to protecting York's "green infrastructure", has specific concerns regarding identification of site at Land adjacent to A1079, which falls within Draft Green Belt, as potential for a recreational opportunity. No justification why this site cannot be considered suitable as a development opportunity. (See Representation for detailed site-specific information).	2517/7909	Lands Improvement
	Support broad thrust, approach and content of Policy CS13.	2527/7954 2528/7978 2537/8002	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Support but clarity needs to be provided on what is meant by improving existing green assets.	2688/8026 2542/8090	
			Moor Lane Consortium

Section 15: Resource Efficiency

Paragraph etc	Comments	Ref.	Name
General			
	PPS1 Climate Change supplement states in paragraph 18 that planning authorities should consider the opportunities for the core strategy to add to the policies and proposals in the RSS. The Council is proposing to use the thresholds and targets set out in RSS Policy ENV5; these are only interim measures and there is an expectation that local authorities will develop their own thresholds and targets. York is aspiring to be a leading environmentally friendly city in its vision and there is scope for a locally distinctive sustainability strategic policy in the core strategy. Further work is needed to establish a locally distinctive policy that could also signpost policies for a low-carbon community in AAP along lines suggested for eco-towns in the Eco-town annex to PPS1.	1/7113	Government Office
	No mention of need to reduce consumption across the board, as part of a policy to minimise resource use, transport and waste generation.	52/8337	York Environment Forum
	Note that policies within LDF will help to reduce York's eco and carbon footprint through promotion of sustainable design and construction, energy efficiency and renewable energy, thereby reducing overall energy use and help in fight against Climate Change. This is to be applauded. However, note there is no insistence that construction at Heslington East is at forefront of energy efficient design.	56/7211	Heslington Parish Council
	Should refer to, and the strategy utilise, unique opportunities provided by University's world-class standing in this area and its leading role in Yorkshire Centre for Low Carbon Futures and Biorefinery Initiative.	190/8281	University of York
	Commitment to require new development to be of a high standard of sustainable design and construction, and target to exceed RSS targets for renewable energy, is welcomed.	479/7752	Yorkshire Forward
	Does not seem to address question of how existing residents will be helped to increase amount of energy generated from on or off-site sources, particularly in historic parts of city.	2691/8169	I Rowland
Introduction			
Paragraph 15.1	Welcome reference to eco and carbon footprint. Use of phrase "help in" the fight against Climate Change is vague. Should be more specific, referenced to legally binding targets in Climate Change Act. Should be some reference to development being assessed to ensure infrastructure capable of sustaining new development e.g. sewage treatment, drainage etc.	458/7662	York Green Party
Context - Policy Context			
Paragraph 15.2	Generally support use of Energy Hierarchy.	458/7663	York Green Party

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Context - Policy Context continued			
Paragraph 15.4 - 15.7	Question emphasis given to CHP. Hard to see how will have significant impact on carbon footprint as relies on combustion of fuel in new plant to generate electricity. This means regular trucking of fuel into residential areas and construction of buried heat mains near present-day buildings. CHP is not usually appropriate for new housing, because heat would not be needed if housing is built to appropriate energy efficiency standards. CHP in commercial premises can be used to power cooling, which is often more in demand than heat. However, use of high thermal mass in buildings is even more resource efficient. It is even becoming possible to retro-fit. Also question extent to which new-build standards will make a significant impact on carbon emissions by 2026 or 2030. Majority of buildings present by those dates will have already been built. Underlines need a) for measures to focus on existing buildings and b) for plan to include clear timescales, targets and indicators in this respect. Crucial that robust mechanism for verifying actual energy performance of developments, once built, should be put into place. This often turns out disappointing due to lack of communication and motivation within building trade. Developments should also aim for longer lifespan than at present: if a building lasts 80 years instead of 40, impact of construction on CO2 emissions is effectively halved.	458/7664	York Green Party
Context - Local Issues			
Paragraph 15.9	Need more detailed projections as what impact measures will have on reducing York's eco and carbon footprints.	458/7665	York Green Party
Context - You Told Us			
Paragraph 15.12	Specific reference should be made to sustainable use of water supplies, specifically safeguarding from contamination and maintaining supply levels of Sandstone Aquifer.	458/7666	York Green Party
The Preferred Approach			
Paragraph 15.13	RSS target for installed grid-connected renewable energy may have been overtaken by events. A more realistic requirement would be at least double this and a target set nearer to 70MW for electricity. There remain energy requirements for heating, and transport (some of which may be electric also). Separate targets should be set for renewables for heating and transport, but latter should not include biofuels. Support a target for on-site generation of renewable energy far higher than 10% required in RSS. Should be set on a scale rising over time in line with requirements under Government's Code for Sustainable Homes and BREEAM standards. Question emphasis given to CHP.	458/7667	York Green Party

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Strategic Objective	Could be framed more positively by removing words "seek to". This would strengthen objective. High standards of sustainable design and construction should be defined in terms of BREEAM or Code for Sustainable Homes ratings that would be expected, as this would provide clarity for those using Core Strategy.	479/7753	Yorkshire Forward
	Should be amended as follows: - "The City of York Council will seek to reduce total emissions of carbon dioxide and oxides of nitrogen , and the eco footprint, through the promotion of sustainable design and construction... thereby reducing overall energy use and help in the fight against climate change and poor local air quality ".	2291/7831	CYC Environmental Protection Unit
Targets	Should include a timeline to reach at least 40% reduction in CO2 emissions by 2026/2030, with projections as to how each measure in section will contribute. Measures in this section alone will not reach that target and similar exercise should be applied to other sections of document. Confused about reference to forthcoming 'Sustainable Design & Construction SPD' as thought already had one. No objection to this being updated on regular basis. 3 rd Bullet: Do not agree should be lower limit of 10 dwellings or equivalent floorspace before at least 10% renewable energy generation is required; solar thermal for example is relatively cheap and easy to install in any number of dwellings. 4 th Bullet point: Not a target, it is an indicator.	458/7668	York Green Party
	3 rd bullet point add following text: - " the choice of renewable energy generation should take into account the need to protect local air quality, in particular emissions of oxides of nitrogen and particulate ".	2291/7832	CYC Environmental Protection Unit
Policy CS14	Considers (i) is inflexible and could undermine delivery of housing in some circumstances. Unclear how policy will work alongside provisions of Code for Sustainable Homes. A clear distinction should be made between housing and other development. RSS Policy ENV5 indicates that developments of more than 10 dwellings should secure 10% of their predicted energy from "decentralised and renewable or low carbon sources". This is more flexible and provides developers with more choice. Also RSS makes clear that these energy targets should only be applied where it is feasible and viable within development. Proposed wording of Policy should be amended to be consistent with this. A fundamental objective is to cut CO2 emissions. Development and use of renewable energy resources is important in achieving this objective. However, there are other ways in which CO2 emissions can be reduced, such as use of innovative building materials, which reduce energy demands. Policy should be sufficiently flexible to support highly energy efficient schemes that achieve the objective of reducing CO2 emissions and meet broader sustainability objectives.	164/7264	Hogg Builders (York) Ltd

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS14 continued	States that future developments will promote high standards of water efficiency and this will be explained further in a Sustainable Design and Construction SPD. "High standard" should be defined before publication of SPD. Preferred approach states best practice at the time, this should that be added to policy for clarity.	320/7455	Yorkshire Water
	ii) Support general principle. It is important to define decision-making criteria in more detail. Suggest wording to effect that sites for stand alone renewables will be given priority unless serious detriment to historic character and setting of York can be proved. iii) Repeat reservations about emphasis on CHP. Support recommendation in Sustainability Appraisal that SPD should be produced in parallel with Core Strategy.	458/7669	York Green Party
	10% target for offsetting predicted carbon output of new developments and conversion of more than 10 dwellings or 1,000m ² of non-residential floorspace could be applied to all new development where viable. The 10% target in RSS should be regarded as a minimum interim target until local targets are adopted. Important to consider there may be opportunities to achieve higher standards within York. While offsetting carbon emissions is important, reducing predicted carbon output of new development in first instance through use of low carbon technologies is preferable and should be encouraged. Whilst support requirement for all new developments over 1,000m ² to assess feasibility of CHP, question why this is limited to these. Policy could be expanded to cover residential developments as well. This would maximise potential for integrating CHP into new development and efficiency of resource use in York.	479/7754	Yorkshire Forward
	Agrees with approach to identifying suitable sites for stand-alone renewable energy.	515/7505	UK Coal Mining Ltd
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations.	525/7533	Associated British Foods plc
	(i) Reference to "innovative techniques" should be deleted. Ample evidence to suggest that innovative techniques often do not perform as predicted and/or are not replicable on a large scale. Whilst may be acceptable to encourage innovative techniques, making this a requirement places an unreasonable burden on developers. Should be no requirement for 10% renewable energy generation to be provided on site. May not be technically/practically possible or viable. Better levels of efficiency may be achieved by larger scale renewable energy schemes serving more than one development. (ii) Should be deleted. Implicit in RSS that renewable energy targets can be exceeded. However, without clear evidence base, no justification for a specific policy, which requires RSS target to be exceeded.	606/7771	Jennifer Hubbard

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS14 continued	See responses to Strategic Objectives (Ref 2291/7831) and Targets (Ref 2291/7832).	2291/7833	CYC Environmental Protection Unit
	Proposed Policy is inflexible and could undermine delivery of housing in some circumstances. Unclear how policy will work alongside provisions of Code for Sustainable Homes. Distinction should be made between housing and other development in energy policy framework. RSS Policy ENV5 indicates that developments of more than 10 dwellings should secure 10% of their predicted energy from “decentralised and renewable or low carbon sources”. This is more flexible and provides developers with more choice on how to enable energy requirements to be met in a sustainable way. Important to note that RSS makes clear that energy targets should only be applied where it is feasible and viable within development. Policy should be amended to be consistent with this. Important to note fundamental objective of PPS22; RSS Policy ENV5; and proposed Policy CS14 is to cut CO2 emissions. Development and use of renewable energy resources is important in achieving this. However, there are other ways in which CO2 emissions can be reduced. Policy should be sufficiently flexible to support highly energy efficient schemes that achieve objective of reducing CO2 emissions and broader sustainability objectives.	2524/7935	Barratt Homes (York) Ltd
	Support most elements but concerned with requirement for proposals for 10 or more dwellings to provide on site renewable energy, which may prove financially challenging and could challenge viability or ability of sites to deliver other important contributions like affordable housing. Should focus on delivery of high quality resource efficient buildings and larger stand-alone renewable proposals, which, when they enter into use, would effectively retrofit existing and proposed development and make them carbon neutral.	2527/7955 2528/7979 2537/8003 2688/8027	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	(i) No scope given to considering how requirements for sustainable resource use could impact on viability of a scheme. Paragraph should be reworded to "Future development and conversions will be a high standard of sustainable design and construction where appropriate using innovative techniques promoting high standards of energy and water efficiency where viable to do so. " Object to on site renewable energy generation exceeding RSS targets as no evidence has been provided as to why this approach is appropriate or how it is realistic.	2542/8091	Moor Lane Consortium
	Little detail or firm policy on how climate change will be tackled. Policy focuses on reducing carbon footprint of new buildings through energy efficiency. There is less emphasis on production of renewable energy to assist in reaching targets. Reference to “energy hierarchy” distracts attention from need to create new renewable energy infrastructure.	2690/8164	Banks Development Ltd

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Question 15			
	Would like to see more detail on how climate change will be addressed, currently no reference to design measures to adapt to a changing climate within the policy. Adaptive measures such as the use of natural shading and Sustainable Drainage Systems can achieve outcomes for both the successful functioning of buildings and biodiversity. Should also indicate that valued environmental assets are to be conserved through policies, and that decisions on major development proposals should seek first to avoid loss or harm to environmental assets, before considering the need for mitigation or compensatory measures. b) Search for most environmentally sustainable locations for development should consider all potential options, including brownfield sites, recognising some are of high environmental value.	4/7135	Natural England
	All strategies mentioned will go some way to reducing carbon footprint. Some emphasis on combined heat and power as an efficient heating source, but no mention of types of fuel, which may be considered. Is domestic and commercial waste a possibility? Also other waste management technologies, which produce energy, which should perhaps be considered. Biomass and energy from waste facilities should be steered towards locations where an end-use for both electricity and heat is guaranteed, and where relevant, new developments should be designed so can now, or in the future, be connected into community heating schemes. No mention of 'waste' as a resource in this section. Waste can be a valuable feedstock to industry if it is adequately separated and processed. Support Policy CS14 in applying the energy hierarchy. Agree with Sustainability Appraisal that the standards for development are included within the policy; compliance with Code for Sustainable Homes and BREEAM standards. Renewable energy - provided wind turbines are designed to be water-compatible, it can be demonstrated that they will remain operational during an extreme flood, and they will not increase flood risk elsewhere, advise that Core Strategy makes clear they will not be subject to flood risk Sequential or Exception Test.	5/7155	Environment Agency
	a) The use of green roofs and walls and SUDS systems may also reduce the amount of runoff from developments and reduce drainage and water treatment requirements and be valuable in reducing urban temperatures.	49/7195	Yorkshire Wildlife Trust
	a) Targets exemplary, but to achieve them will be much more difficult in a depressed market. Development in York is marginal and extra costs will cause major problems in supply chain. b) No.	198/7291	The Helmsley Group

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Question 15 continued			
	b) Approach would only be appropriate where justified by robust and credible evidence base. One of targets is to exceed RSS targets of 11MW of renewable energy by year 2010 and 31MW by the year 2021. Query reasoning behind this. Should only be sought where can be fully justified by evidence.	214/7345 621/7391	Network Rail National Museum of Science & Industry
	a) Yes.	218/7409	Northern Gas Networks
	Recommend Council introduce specific policies designed to deliver greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change. Minimising Environmental Impact Recommend that avoid using generic phrases, which simply seek to encourage the use of energy efficiency, renewable energy and minimisation and management of waste and pollution, for example. Such phrases lack detail and commitment necessary to ensure that such aspirations are achieved. Recommend inclusion of an overarching climate change policy addressing these issues. Discrete, proactive policies on energy efficiency, renewable energy, sustainable design and construction, should be included in Development Control DPD, to provide detailed policy direction on each issue and to ensure that such environmental measures are delivered. Renewable Energy Policy LDF should include a robust criteria based policy to assess all applications for renewable energy developments. Recommend that include specific development control policy on renewable energy, focusing on key criteria that will be used to judge applications, and providing direct reference to PPS22. More detailed issues may be appropriate to SPDs. PPS22 states local development documents should contain policies designed to promote and encourage, rather than restrict, development of renewable energy resources. Therefore recommend that policies designed to safeguard character and setting of listed buildings, conservation areas and green belt, for example, have regard to positive contribution that renewable energy can play in reducing Council's overall CO2 emissions and in mitigating against environmentally damaging effects of climate change. Landscape and nature conservation designations should not be used in themselves to refuse permission for renewable energy developments. Applications in such areas should be assessed against criteria based policies set out in local development documents. Any local approach to protecting landscape and townscape should be consistent with PPS22 and not preclude supply of any type of renewable energy other than in most exceptional circumstances.	334/7481	The British Wind Energy Association

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Question 15 continued			
	Renewable Energy Policy continued Should not make assumptions about technical and commercial feasibility of renewable energy projects. Technological change can mean that sites, currently excluded as locations for particular types of renewable energy development, may in future be suitable. Similarly, should not require applicants for energy development to demonstrate either overall need for renewable energy and its distribution, nor question energy justification for why a proposal for such development must be sited in a particular location. Information requested of applicants should be proportionate to scale of proposed development, its likely impact on and vulnerability to climate change, and be consistent with that needed to demonstrate conformity with development plan and Climate Change Supplement to PPS1. Specific and standalone assessments of new development should not be required where requisite information can be made available through other submitted documents e.g. as part of a Design and Access Statement, or Environmental Impact Assessment. Low and Zero Carbon Developments Contribution that small renewable systems can make is emphasised, and urges implementation of policy for mandatory requirement of onsite renewables. This would require onsite renewables to provide electricity for at least 10% of all new buildings' needs (including refurbishments), in addition to stringent energy efficiency/building performance requirements. The following wording is suggested as an example: - “All non-residential or mixed use developments (new build, conversion, or renovation) above a threshold of 1,000m² will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation. All residential developments (new build, conversion, or renovation) of 10 or more units will be expected to provide at least 10% of their energy requirements from onsite renewable energy generation.” Recommend inclusion of discrete policy on sustainable design and construction methods, and introduction of minimum efficiency standards for extensions, change of use conversions, and refurbishments/listed building restorations. Would help ensure increases in energy efficiency within existing building stock, as well as in new build. Recommend looking at Renewable Energy Toolkit for planners, developers and consultants, developed by London Energy Partnership for further guidance.	334/7481 continued	The British Wind Energy Association continued

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Question 15 continued			
	In accordance with Climate Change Supplement to PPS1, should have an evidence-based understanding of local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in area. From this evidence-base, should: - • Set out a target percentage of energy to be used in new development to come from decentralised and renewable or low-carbon energy sources, where viable. Target should avoid prescription on technologies and be flexible in how carbon savings from local energy supplies are to be secured; • Where there are particular and demonstrable opportunities for greater use of decentralised and renewable or low-carbon energy than target percentage, bring forward development area22 or site-specific targets to secure this potential; and, in bringing forward targets; • Set out type and size of development to which target will be applied; • Ensure there is a clear rationale for the target and it is properly tested. In addition, recommend that development plan provide a brief outline of different renewable energy generation technologies, and equally encourage and promote all forms of renewable energy (solar, biomass, wind, geothermal, hydro etc). Potential for an Energy Services Company and site-wide CHP should also be considered for inclusion.	334/7481 continued	The British Wind Energy Association continued
	a) Yes. However real question is will they 'help' sufficiently. For that need proper strategies, targets and indicators in respect of carbon reduction strategy. b) Yes. Have reservations about CHP and need for clear criteria in identification of locations for renewables. Danger that number of locations identified will be too limited.	458/7670	York Green Party
	a) Yes. Should be recognised that North Selby site has potential for 'stand alone' renewable energy production and to make a significant contribution to education and development of biorenewable technologies. b) RSS thresholds for renewable energy generation are sufficient. Not necessary to undertake further work on this. Other factors such as creation of jobs and planning gain should be given as much weight as amount of on site renewable energy generation a development produces. Green targets need to be balanced with need for economic development. Implementing higher renewable energy targets could restrict economic development.	515/7504	UK Coal Mining Ltd
	On and off site renewable energy generating methods are technologies, which are evolving and may not deliver most sustainable solution to sustainable building. Should promote sustainable building and development in its broadest sense, rather than promoting tokenistic on site renewable power generation, when reducing energy demands and more efficient building techniques could more effectively reduce demand for energy in first place.	546/7708 2510/7879	Miller Homes Ltd Taylor Wimpey UK Ltd

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Question 15 continued			
	Welcomes commitment to achievement of targets for generation of energy from renewable sources and to at least achieving targets set out in RSS. However, potential impacts of this should be set out within supporting text to policy. E.g. may be worthwhile identifying a potential requirement for number of wind turbines needed to generate additional renewable energy capacity. Also appropriate to identify potential sites that have access to relevant infrastructure (grid-connection etc) and able to contribute by means other than wind technology. Harewood Whin site has planning permission for generation of renewable electricity from a number of sources, primarily landfill gas and waste wood. Identification of site to accommodate further renewable energy generation technology and which would not have a demonstrable impact upon special character and setting of City would be welcomed.	608/8287	Yorwaste Ltd
	No consideration as to how choices of resources impact on emissions of oxides of nitrogen and resultant local air quality. Section should be improved so focuses more on need to reduce all types of emissions and incorporates likely requirements of forthcoming LES. Brownfield sites are often affected by land contamination, so important risks are considered and appropriately managed.	2291/7834	CYC Environmental Protection Unit
	Important that an energy policy framework is set within Core Strategy and future Minerals and Waste Development Plan Documents to recognise CBM as a source of national energy production and national, strategic and spatial implications of proposed use of CBM as part of energy suite of resources. Should include new bullet points making reference to importance of CBM and potential within area covered by Council. Importance of CBM should be reflected by a specific policy, or an insert into a policy to reflect its importance as an alternative source of energy. Core Strategy should be extended to cover CBM. Following wording should be included within this Section and Section 18 under a new heading: - ONSHORE GAS EXTRACTION - Coal Bed Methane The Government's energy policy seeks to encourage the extraction of methane from deep coal beds as part of a strategy for clean coal technology. This is supported in Minerals Policy Statement 1: Minerals and Planning (MPS1). Onshore gas extraction is comprehensively regulated. The Department of Energy and Climate Change has awarded a Petroleum, Exploration and Development Licences for an area, which covers parts of City of York Council. These PEDL areas have the potential to produce methane from the deep virgin (un-mined) coal seams (at depths of 550m to 1500m) in this area. These PEDL areas are also located close to the existing national power (gas and electricity) transmission grid and they are in an important strategic location.	2521/7911	Composite Energy Ltd

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Question 15 continued			
	Coal Bed methane (CBM) development provides an opportunity to extract a nationally important natural energy resource without the environmental impact normally associated with coal extraction. The extraction of coal bed methane in the City of York Council area will involve more than one exploration and production area. CBM extraction offers the potential to consider a range of economic benefits and these should be considered at the earliest opportunity. It is also possible that as the coal seams are worked, methods to improve the efficiency of gas extraction could also contribute to carbon capture by chemically bonding carbon dioxide present in flue gases to coal to release methane through improved displacement. This process is subject to current research and will be subject to further testing. <i>Proposals for the extraction of coal bed methane are in the national interest and should be favourably considered in the Areas of Search indicated on the Key Diagram.</i> <i>Applications for individual wells or groups of wells as part of the process of exploration and production for coal bed methane and the associated interconnecting pipelines and other essential gas processing or distribution infrastructure to serve more than one development area will be permitted as long as significant adverse environmental impacts do not arise.</i> <i>Applications should be presented with sufficient information to adequately assess the environmental implications of the proposals including field development plans. Cumulative environmental impacts should be considered and assessed if necessary. Impacts on Natura 2000 sites or European Protected Species will be considered in accord with existing Policies. Conditions and agreements should be attached to planning permissions to ensure the exploration and production operations have an acceptable impact on the local environment or residents. Permissions for wells will be conditioned for the life of the well.</i>	2521/7911 continued	Composite Energy Ltd continued
	a) Some of measures are prescriptive and blunt in approach. If agreed that primary objective is to reduce CO2 emissions, Plan should not be prescriptive about how this is achieved. Requirement for all schemes over 10 dwellings or 1,000m² to offset 10% of predicted carbon emissions through on site renewable energy generation is unnecessary and overly prescriptive. 10% reduction in carbon emissions should be retained as a target but how it is achieved should be left to individual scheme. Core Strategy should not duplicate codes and guidance enforced through building regulations regime.	2523/7921	Grantside Ltd

Section 15: Resource Efficiency continued

Paragraph etc	Comments	Ref.	Name
Question 15 continued			
	Appears to be a bias towards CHP. Not clear whether all CHP would count towards renewable targets because some can be gas powered. Whilst support this should not be a preferred technology. Wind farms not specifically mentioned in Core Strategy. Should cover some of issues, which are specific to wind farm developments, given that RSS has established a capacity for wind farms in District. Suggest that best way for policy to develop is to adopt a constraints mapping approach to find an appropriate wind farm site, which could be identified in Allocations DPD. Suggest site around 1km west of Copmanthorpe near to Hagg Wood, approximately 9km from York city centre. Consider has potential for a range of 3-5 turbines or 8-12.5MW of green renewable energy generation. This would contribute significantly to York's renewable energy targets. (See representation for detailed site-specific information) Consider that North Selby Mine is inappropriate for wind energy development because wind speeds at site would be commercially unviable and risk of interference with bird life from Wheldrake Ings, It may present an opportunity for other forms of renewable energy development; however, consider that wind energy development would not be viable. North Selby Mine also lies in a special Green Belt area designated as 'Extension to the Green Wedge' and therefore may not be appropriate in landscape terms.	2690/8165	Banks Development Ltd

Section 16: Flood Risk

Paragraph etc	Comments	Ref.	Name
General			
	No mention of new techniques of construction which could allow for development in flood risk areas, which might release otherwise undevelopable land.	52/8338	York Environment Forum
	Support approach. Importance of ensuring that exceptions tests are rigorous and complete in all respects cannot be understated.	479/7755	Yorkshire Forward
Introduction			
Paragraph 16.1	Should also recognise flooding from other sources. First sentence identifies River Ouse, Foss and Derwent as flood risks but does not mention pluvial flooding.	320/7456	Yorkshire Water
	Welcome recognition that climate change will increase threat of flooding significantly. Some studies predict even if national and global target for emissions reduction are met, existing climate change will lead to sea level rises which could have serious consequences for York. Needs to be taken into account.	458/7671	York Green Party
Context			
Paragraph 16.2 - 16.7	Given seriousness of potential impact of sea level rises, doubtful of appropriateness of Sequential Test and particularly Exception Test. Prefer to see overriding approach based on precautionary principle. This would lead to excluding all areas in Zone 3 from new housing or general employment purposes (some specific uses may be appropriate). Believe concept of Exception Test is flawed. If flood risk is high then site cannot be sustainable.	458/7672	York Green Party
The Preferred Approach			
Strategic Objective	Agrees with objective to ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk.	2524/7936	Barratt Homes (York) Ltd
Targets	Support target of reducing existing runoff rates by at least 30%. However, note that maybe sites with previous land contamination where implementing some common elements of sustainable drainage systems such as soakaways and other infiltration devices, may present an unacceptable pollution risk. Support target of ensuring there is no alteration in run-off rates on all greenfield developments. However, could be further bolstered by a requirement that additional volume of run-off following development of a greenfield site, due to the increase in impermeability and consequential reduction in infiltration, is taken into account by providing long-term storage. This additional volume, if not addressed, could cause increased flooding downstream.	5/7157	Environment Agency
	Support 2 nd bullet point re brownfield development. This percentage may need to be reviewed and increased during plan period. Agree target for Greenfield sites is correct objective, but do not believe can be achieved in practice.	458/7673	York Green Party

Section 16: Flood Risk continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS15	The following sentence in the first paragraph should be slightly amended to read: “Development in high flood risk areas (Flood Zone 3a(i, ii, iii) will be subject to consideration of the Sequential Test and the Exception Test”. Recommend that a Sustainable Design and Construction SPD addresses issues of Flood Resilience and Resistance of new developments along with the issue of SuDS adoption.	5/7158	Environment Agency
	Reference to run off from brownfield sites should be amended to read: - “ at least a 30% reduction in discharge rates for all events up to and including 1:100 year event.”	199/7295	York Consortium of Drainage Boards
	Should be re-drafted to ensure conformity with PPS25. York has significant brownfield opportunities for development within Flood Zone 3, and having regard to constrained nature of historic environment within city centre, and current extent of “draft” Green Belt that local residents are keen to protect, there is a need to ensure delivery of brownfield opportunities within Flood Zone 3 to meet its development needs over LDF Plan period. Spatial strategy prioritises brownfield land, and therefore assumes PPS25 Exception Test will be passed. In this context, Policy should start by stating, “In identifying sites for development, taking account of the PPS25 Sequential and Exception Tests , the City of York Council will ensure that flood risk is minimised to new development...” It should be made clear within policy that water compatible and less vulnerable uses may be permitted within Flood Zone 3a without need to comply with Exception Test, however compliance with Exception Test will be necessary if essential infrastructure or more vulnerable uses are proposed within Flood Zone 3(a). Not in a position to comment on whether 30% target is achievable on all brownfield sites, but some flexibility should be built into Policy to reflect instances where not possible to achieve desired level.	214/7346 621/7392	Network Rail National Museum of Science & Industry
	All new developments, and significant refurbishments, should follow SUDS principles. Needs to be stressed in development control to minimise runoff and make use of rainwater harvesting in preference to flood storage. Section 106 agreements should be used to assure future maintenance of drainage infrastructure. Support recommendations of sustainability appraisal to more explicitly refer to reducing runoff by sustainable drainage measures and to safeguard land needed in future for making space for water uses and flood risk management. All resurfacing work should be required to meet recently introduced permeability standards regardless of area.	458/7674	York Green Party
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations.	525/7534	Associated British Foods plc

Section 16: Flood Risk continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach continued			
Policy CS15 continued	Nothing in strategic policy, which relates to material not otherwise covered through national policy. Should not be re-stated or re-formulated through Core Strategy.	606/7772 610/7794	Jennifer Hubbard Mr G E Wright
	Policy is adequate. However, may be circumstances where a reduction of 30% in run off rates for developments on previously developed sites may not be achievable. As such, policy should be flexibly worded to enable developers to justify a lower % run off reduction in circumstances where a 30% reduction is not technically possible or where such measures would result in an otherwise acceptable development being unviable.	2524/8323	Barratt Homes (York) Ltd
	Support broad approach but phrasing needs to be softened to allow some degree of flexibility in particular with respect to run off rates.	2527/7956 2528/7980 2537/8004 2688/8028	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	Whilst recognise need to ensure that flood risk is minimised in new development, consider requirement for all brownfield developments to demonstrate a reduction of at least 30% in run-off rates is onerous. May not be achievable for all sites, where perhaps existing run off rates are already relatively low due to large areas of permeable surfaces. Suggest Policy provides mechanism for developers to demonstrate why target might not be achievable for certain sites. Meeting these targets should not be a reason to refuse otherwise acceptable proposals.	2540/8043	National Grid Property
	4 th paragraph - object as does not consider financial implications of implementing Sustainable Urban Drainage Systems. Should be reworded to "All new development will include the implementation of Sustainable Urban Drainage Systems where technically feasible and financially viable. "	2542/8092	Moor Lane Consortium
Question 16			
	Appropriate spatial planning and more sustainable land management and use can help to reduce the likelihood of flooding, thereby making a critical contribution to flood and erosion risk management. For instance, flood risk management schemes that work with physical processes, involving creation of wetlands and washlands, and restoration of river floodplains, can deliver both flood risk reduction and enhance local biodiversity. SUDS can play a significant role in reducing run off rates and should be required for new developments that are likely to increase the risk of flooding. Should also be incentives to encourage retro-fitting of SUDS in existing areas.	4/7136	Natural England

Section 16: Flood Risk continued

Paragraph etc	Comments	Ref.	Name
Question 16 continued			
	Generally support. To further assist in the consistent and thorough application of the Sequential Test and Exception Test, could consider developing local guidance tailored to York. This could be referred to in Core Strategy in order to give it planning weight. This has been partially carried out in SFRA. The guidance could be expanded to include a York specific definition of “reasonably available sites”, the geographical area to which searches should be applied and how windfall sites should be dealt with. All references to Sustainable Urban Drainage Systems should be amended to Sustainable Drainage Systems to reflect the current nomenclature.	5/7156	Environment Agency
	a) Opportunities for reducing flooding and increasing floodplain and washlands flood storage could be investigated and may involve neighbouring authorities. Commercial pressure for inappropriate developments in the flood plain will need to be resisted. b) SUDS schemes allied with green roofs could help with meeting this target and could have biodiversity benefits.	49/7196	Yorkshire Wildlife Trust
	Agrees with strategic objective and generally accepts Policy CS15 is adequate and will assist in meeting this objective. However, may be circumstances where a reduction of 30% in run off rates for developments on previously developed sites may not be achievable. Policy should be flexibly worded to enable developers to justify a lower % run off reduction in circumstances where a 30% reduction is not technically possible or where such measures would result in an otherwise acceptable development being unviable.	164/7265	Hogg Builders (York) Ltd
	a) Should help. b) 20% should be target. Should be encouraging existing developments to prevent run off by using self draining services rather than tarmac etc., this will have more of an impact on new development which is coming forward.	198/7292	The Helmsley Group
	a) Yes. b) Agree that 30% target is realistic and achievable.	218/7410	Northern Gas Networks
	Supports principle to reduce surface water run off by 30% on brownfield sites. Although recognise that each site will have to be looked at on an individual basis. Supports policy CS15. However, when is sustainable drainage systems SPD due to be published? If not adopted at same time as Core Strategy what will be used as guidance/best practice?	320/7457	Yorkshire Water

Section 16: Flood Risk continued

Paragraph etc	Comments	Ref.	Name
Question 16 continued			
	a) Supports overall approach. However objects to requirement for brownfield developments to demonstrate that there will be a reduction of at least 30% in existing run-off rates as a result of development. b) Objects to target of 30% on basis that Council has not provided evidence that this is achievable. SFRA recommends that surface water runoff rates for developments in Flood Zone 1 should be where practicable “restricted to existing runoff rates (if a brownfield site), with preferably a reduction in runoff if possible.” This is a more realistic requirement, which will not be unduly restrictive for developers.	515/7506	UK Coal Mining Ltd
	No supporting evidence to justify inclusion of percentage target for reduction of run-off rates. Imperative to ensure a flexible approach in dealing with large-scale regeneration sites with competing objectives. In context of British Sugar site, this type of prescriptive policy is inappropriate and pre-judges development potential of site. Percentage target conflicts with Government guidance in PPS25.	525/7535	Associated British Foods plc

Section 17: Sustainable Waste Management

Paragraph etc	Comments	Ref.	Name
General			
	Core Strategies should normally include waste strategies/policies unless these matters are being addressed in other DPDs being prepared jointly with other local authorities or separately by the unitary authority. It is understood that a decision may be made to work jointly with NYCC. Otherwise would be a need for a more comprehensive policy cover and a need to make sure that Policy CS16 provides the coverage required by PPS10 and RSS.	1/7114	Government Office
	Division of responsibility for overseeing disposal of different streams of waste appears to mean there is little co-ordination. PFI solution will only deal with certain aspects. If population projections and targets for economic growth and housing provision are accepted, waste generation forecasts cannot be correct, and more facilities will be required. If waste is to be transported outside York boundary, future of Harewood Whin and Hessay transfer station is uncertain. Reducing waste Reduction of waste is first priority in waste management, a move to zero waste and education should be considered. Reuse No provision for re-use at Council recycling sites. Examples where this already happens include Haverhill, Suffolk and Matlock, Derbyshire. This should be introduced and encouraged. Recycling Organic Waste Waste Management Strategy offers no proposals for safe processing of food. Currently food waste goes into landfill, which causes problems in relation to landfill gases and disease. Retro-installed gas capture equipment has now been installed at Harwood Whin but this has not eliminated the problem. Suggested that anaerobic digestion is a safe alternative for food waste and should be considered. This can also generate energy. The largest anaerobic digestion plant in UK is currently being built at Selby Renewables Energy Park. York's waste food should be diverted to this plant as a priority. Recycling Dry Recyclables Range of materials collected by Council is extremely limited when compared to other Local Authorities – joined up thinking is required. Residual Waste An alternative to landfill is Energy from Waste (EfW). However this is considered an inflexible technique for waste disposal, which could reduce recycling rates. MBT is considered to be the preferred option, which removes recyclables. Biogas generated by the anaerobic digestion process can be burned cleanly to generate energy – this should also be a consideration.	52/8339	York Environment Forum

Section 17: Sustainable Waste Management continued

Paragraph etc	Comments	Ref.	Name
General continued			
	Hazardous Waste Council provides a limited service for hazardous wastes. Problem is that people may dispose of this in general rubbish collections, which will go undetected. New facilities required. PFI Little information has been made public about PFI project. No significant public consultation has been carried out, which needs to be rectified. CYC Waste Management Strategy Current Strategy is limited and lacks ambition. It leaves York without an adequate direction for improvement to its waste management services. Provides no parameters to direct PFI process. Strategy should be rewritten to give a firmer direction for improvement of all waste management services. Harewood Whin Failure of site restoration including nature conservation and public access measures required under planning conditions must be implemented. Otherwise this is considered a serious failure. Composting Council is making insufficient use of composting garden waste for its own purposes. This could be used as a soil conditioner to improve soil health and plant growth, reducing the need for hand labour and herbicides to conserve soil moisture, and the need for irrigation.	52/8339 continued	York Environment Forum continued
	Agree in general with concept of waste hierarchy. However, case for PFI is flawed. Once contracts are signed commercial partner has no incentive to reduce amount of residual waste, but every incentive to increase it, or failing that to have it brought in from further afield. Energy from Waste (EfW) requires residual waste to have some calorific content, whereas in most cases (wood, cardboard, plastic) better treated by composting or recycling. Waste treatment technologies are improving quicker than traditional PFI, meaning that region will be burdened with a technology, which is outdated, as well as being expensive to run. Traditional EfW plants are only 15% efficient for generation of electricity alone, and often uneconomic without addition of a heat component. Most efficient way to treat waste involves making sure materials of different types (metal, plastic, organic) are no longer mixed in manufacturing process, particularly in short-lived items. Plastic packaging should be reduced to types 1 and 2 (PET and HDPE) for ease of separation. Might be done via some type of local incentive, perhaps involving Section 106 agreements or licensing. One use for resulting revenue might be small modular plants for specialist treatment, for example of tetra-paks, or for closed-loop recycling of agricultural plastic or plastic bottles.	458/7675	York Green Party

Section 17: Sustainable Waste Management continued

Paragraph etc	Comments	Ref.	Name
General continued			
	Harewood Whin site will continue to play a strategic role in management of waste in North Yorkshire sub-region. Policies of Core Strategy (and future policies contained within Allocations DPD) need to reflect importance of site in a waste management context.	608/8285	Yorwaste Ltd
Context - Local Context - Sub-Regional & Local Waste Strategies			
Paragraph 17.21	Refers to cross-boundary issues arising from another administrative area providing part of the strategic requirement for waste management and disposal in the transfer of waste to North Yorkshire. Need to make sure there is clear sign-up for the delivery of this element of the waste strategy, with a fallback position if necessary.	1/7115	Government Office
The Preferred Approach - Municipal Solid Waste			
Table 10	Projected future amounts of total waste may be over-estimates, due to changed economic circumstances, advances in technology and public mood. Will undermine any economic case for typical energy from waste plants.	458/7676	York Green Party
The Preferred Approach			
Targets	Target 2 should be higher. Should be looking for at least 65% by 2020.	458/7677	York Green Party
Policy CS16	PPS1 Eco-town supplement refers in paragraph ET19 to eco-town applications including a sustainable waste and resources plan, covering both domestic and non-domestic waste. This would set higher targets for dealing with waste and consider the use of locally generated waste as a fuel source for combined heat and power generation. May want to consider including a locally specific element on these lines that will provide a hook to the Northwest AAP.	1/7116	Government Office
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations.	525/7536	Associated British Foods plc
	Should reflect that wherever possible waste transfer would avoid use of SRN.	2434/7854	Highways Agency
Question 17			
	Welcome an approach that fits in with waste hierarchy in PPS10.	4/7137	Natural England
	Welcome approach of promoting waste hierarchy. Wish waste to be considered as a resource for further use and would encourage policies which encourage co-location of waste processing and industries which can use waste as a feedstock as stated in PPS10. Apparent that new waste management facilities will be required in order to meet reuse and recycling targets. Important to note that any new sites need to be chosen and developed in ways which will minimise the impact on the environment and human health. Capacity for treatment of green waste is limited and long-term solutions need to be reached. Alternatives to major composting sites such as community composting schemes may be appropriate.	5/7159	Environment Agency

Section 17: Sustainable Waste Management continued

Paragraph etc	Comments	Ref.	Name
Question 17 continued			
	Clear guidance confirming where such facilities are appropriate would be helpful. Should be made clear that Waste sites are subject to the rigours of the PPS 25 Sequential Test and, where applicable, the Exception Test. This requirement should be included under the "Preferred Approach" text. Additionally, third bullet point under paragraph 17.23, that allocations should be informed by SFRA, should be incorporated into Preferred Approach.	5/7159 continued	Environment Agency continued
	Satisfied that correct approach has been taken. Happy to comment at a future date on any implications for biodiversity and wildlife. Waste facilities can affect wildlife sites in a number of ways such as noise and disturbance, presence of rats, and nitrogen deposition. Biodiversity is an issue to be considered when choosing appropriate areas for facilities.	49/7197	Yorkshire Wildlife Trust
	Agree.	218/7411	Northern Gas Networks
	Yes. Provision for large-scale composting facilities may be required. Object to plans to specify a site for waste incineration. Need a much more detailed strategy for waste prevention and re-use. Sites for re-use facilities should be identified. Should be reference to encouraging facilities for home composting and use of allotment sites for small-scale green waste community composting. Would reduce transport impact of green waste collection and large-scale composting. Waste Strategy pays insufficient attention to commercial and Construction and Demolition waste, which account for over 90% by weight of all waste in UK. Explanation of waste strategy needs to be clearer and more consistent in figures and tables. Terminology used, and tables provided inconsistent, confusing and contradictory. Figures bear little or no relation to targets at end of section.	458/7678	York Green Party
	Supports approach that is being taken with regard to sustainable waste management.	515/7507	UK Coal Mining Ltd
	Promotion of reduction, re-use and recycling together with measures to promote recycling are supported. However, targets and proposed policy is significantly lacking both in terms of types of waste management facility required and differing requirements of different waste streams. Proposed targets, all relate to management of household and municipal wastes and do not recognise requirement to manage other waste streams, particularly relevant to management of commercial and industrial waste. This is a significant omission, which should be addressed. In 1 st bullet point of CS16 the wording "if required" should be removed. RSS identifies that additional capacity " is required ". PPS10 requires authorities to plan for sufficient capacity equivalent to at least 10 years provision for all waste streams. Therefore Council should be identifying through Allocations DPD sufficient capacity to meet these requirements. Failure to do so would render Policy not sound.	608/8288	Yorwaste Ltd

Section 17: Sustainable Waste Management continued

Paragraph etc	Comments	Ref.	Name
Question 17 continued			
	Fails to recognise continuing role of landfill within overall strategy. Landfill represents lowest point on waste hierarchy; however it will continue to play an important role in waste management even after initiatives to reduce, re-use and recycle have taken effect. Wording of policy, targets and supporting text make little mention of landfill. In fact wording of targets infers a maximum of approximately 20,000 tonnes per year of landfill would be required in 2020 this is not case. Targets relate only to Biodegradable Municipal Wastes with no acknowledgement for requirements to manage commercial and industrial wastes. Longer-term requirements for landfill capacity should be explicitly set out within either targets or policy that would then enable a full understanding of ongoing requirements for landfill as a waste management operation. Should also take into account cross-boundary transfers of waste between York and North Yorkshire Areas, this will become increasingly important upon completion of PFI project. Whilst targets and objectives are considered generally appropriate, as far as they currently go, not clear from Policy exactly how this would be achieved, further expansion of policy required to demonstrate how it would in fact successfully bring about achievement of targets. Proposed Resource Recovery Centre (RRC) would help achieve objective of provision of facilities in appropriate locations, when existing transport corridors and other Green Belt restrictions are considered. Within City boundary, limited opportunities for development and operation of a large-scale waste management facility that benefits from co-location with various recycling and recovery operations. Infilling of Harewood site plus some relatively minor additional development of adjoining land would maximise benefit of this existing major developed site. Companion Guide to PPS10 is particularly pertinent. Guidance is relevant to existing situation within York, in that opportunities to develop waste management sites outside Green Belt, but within Council's boundary, are limited. Supports removal of site from Green Belt, and accommodate proposed operations within an identified site or zone specifically designated for purpose of waste management. Site would aid in driving waste up waste hierarchy, via provision of long term recycling and recovery services already established. Range of services proposed would ensure that materials could be removed from most waste streams for recycling or recovery. If not able to be recycled or recovered, co-location of a non-hazardous landfill at site would ensure that most non-hazardous waste may be disposed within Council's boundary without need for transport to more distant facilities. Site would aid in achievement of landfill diversion and recycling targets, avoiding incurrence of penalty costs.	608/8288 continued	Yorwaste Ltd continued

Section 17: Sustainable Waste Management continued

Paragraph etc	Comments	Ref.	Name
Question 17 continued			
	Once PFI treatment plant is established, non-recyclable waste would still require bulking and transfer to that facility, which is likely to be located outside Council boundary. (The bulking and transfer of waste reduces cost and carbon footprint associated with individual collection vehicles travelling to disposal / treatment facilities). Development of RRC is essential infrastructure if waste is to be dealt with further up Hierarchy. Once a material has become waste, as much resource must be re-used, recycled or recovered as possible prior to disposal. Services to be offered will include ability to: - remove items that may be re-used; Extract a wide range of recyclables from municipal and commercial waste streams, including the composting of green and other organic waste and; recover value from non-recyclable waste. RRC will be a strategically important facility, able to handle a large portion of these estimated volumes and aid Council in achieving treatment capacities. (See representation for details). May be possible to recycle or recover many of agricultural wastes. Site would serve as a transfer and bulking point for those wastes, which could not be recycled on site. Development of integrated facility at site would represent Best Practical Environmental Option, as continuing use of facility would: - Not significantly impact the Green Belt; Avoid need to develop new waste facilities elsewhere, possibly in less favourable locations; Provide essential waste services combined with additional benefits such as local employment and business support, and renewable energy; Move waste up hierarchy. Satisfies proximity principle, in that York's waste is being treated or recycled near to point of production, and assists Council in being self sufficient in waste management terms. Increase in kerbside recycling, and segregation of recyclable wastes by householder results in waste streams that will require handling. Site would be able to handle these large volumes of waste. Once PFI facility becomes operational, bulking and transfer service to be offered at site would be essential to reduce volume of waste traffic on major arterial roads and reduce costs of transport of non-recyclable waste. Location makes it an ideal site for this due to easy access to A64 and A1. Non-recyclable municipal waste already being received so continuing import of waste will not cause significant adverse impacts on surrounding road network Request that comments previously submitted in response to Core Strategy should be taken into account. (Copy included with representation). LDF and related documents should reflect requirement for facilities to recycle waste and bulk and transfer of non-recyclable waste, once PFI treatment plant becomes operational.	608/8288 continued	Yorwaste Ltd continued

Section 17: Sustainable Waste Management continued

Paragraph etc	Comments	Ref.	Name
Question 17 continued			
	With regard to Construction and Development waste, recyclable waste received by York's HWRC sites is delivered to Harewood Whin for further processing and/or bulking and transport to other recycling facilities. Significant volumes of C&D waste from commercial sources, not received at HWRCs, is also received at Harewood where approximately 100,000 tpa is subject to further treatment to remove clean inert soils and brick, metals, cardboard, wood etc for further recycling or recovery. Core Strategy outlines major housing sites, with over 5800 new homes predicted. Site would be able to handle majority of construction waste associated with this. Once completed, these developments would result in over 5800 households whose waste will require recycling, disposal or transfer. Site will be essential in supporting Council in managing this. If future occupiers of commercial sites are successful in recycling their waste, then site would also be available to service needs with regard to bulking, sorting, packaging and transfer of waste to more distant reprocessing facilities (e.g. for glass, cans, paper etc.) Location and range of services offered by facility are of strategic importance to Council and surrounding NYCC area. These comments should be fed into Allocations DPD. Site will offer treatment and transfer of various waste streams, including hazardous WEEE, batteries etc received from HWRCs and commercial customers within area. Site will assist in achieving strategic objectives, in that: - proposed RRC would provide re-use, recycling and composting facilities; be of adequate size to accommodate range of strategic waste management and treatment facilities required by Council and other customers in area; provide a facility for bulking and transfer of non-recyclable municipal waste for onward transportation to PFI facility. RRC will play an essential part in Council achieving targets. Development of RRC will be essential in ensuring Council achieves sustainable waste management, in that: - • Provision of new of enhanced waste management facilities is required; therefore Council must consider proposed RRC as representing an ideal option to fulfil this requirement. Developments proposed would involve enhancement of existing waste management and treatment facility in a suitable location. • Development would further integrate waste management services within York at a single location, which benefits from easy access to major transport corridors around York. • RRC will form an essential role on local service provision for commercial as well as municipal customers, and thereby help maintain conditions for business success in area.	608/8288 continued	Yorwaste Ltd continued

Section 17: Sustainable Waste Management continued

Paragraph etc	Comments	Ref.	Name
Question 17 continued			
	- Site will benefit from enhanced screening in form of screening bund and planting, to compliment existing mature planting and landforms. Use of site will mean that majority of strategic waste services required in York can be undertaken without impacting historic character and setting of City. - Improvements and full enclosure of many recycling activities proposed for site will help protect local amenity. - RRC will not impact on significant nature conservation sites. Undertaking consultation with local residents regarding landfill restoration, with view to improve landscaping and public access at site.	608/8288 continued	Yorwaste Ltd continued
	New waste transfer stations will need to be located in areas where unlikely to have air quality impacts. Will need to be evaluated for potential issues regarding noise, odour, light and dust in relation to development in close proximity. Old waste disposal sites may be affected by land contamination. This should be considered when proposing new development in vicinity.	2291/7835	CYC Environmental Protection Unit
	Support.	2527/7957 2528/7981 2537/8005 2688/8029	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.

Section 18: Minerals

Paragraph etc	Comments	Ref.	Name
General			
	MPS1 requires authorities to define Mineral Safeguarding Areas. These should be shown on the Key Diagram.	1/7117	Government Office
	Area designated runs from Rufforth to Poppleton. No justification for minerals extraction here.	52/8340	York Environment Forum
	As highlighted in Paragraph 1.38 and Section 18, York has not historically played a key role in provision of minerals, and this is case with regard to coal. Records show that mining legacy within city boundary is limited to just two mine entries at North Selby Mine, to east of village of Deighton. No mining legacy risks therefore attached to any development proposals. Southern part of City falls within defined coalfield area, however no coal resources capable of extraction by surface mining methods present in York. Will not therefore be seeking identification of any Mineral Safeguarding Areas relating to coal as part of LDF. However, mapping indicates that there are deep coal resources underneath whole of City of York area. Whilst not previously deemed accessible or viable to extract, extraction of Coal Bed Methane (CBM) is becoming increasingly widespread in areas of deep coal resource. As required by Annex 4 of MPS1, should identify in an LDD extent of coalfield with deep reserves and list principal constraints to any proposed production. Should therefore highlight emerging issue of CBM with a paragraph in Core Strategy.	397/7490	The Coal Authority Planning & Local Authority Liaison Department
	See comment under Question 15 (Ref 2521/7911).	2521/7912	Composite Energy Ltd
Introduction			
Paragraph 18.1	Support principle of reducing dependency on primary extraction.	458/7679	York Green Party
Context - Policy Context			
Paragraph 18.2	It is society that needs infrastructure, buildings and goods. Industry and economy support needs of society.	458/7680	York Green Party
Paragraph 18.3	'Avoidance' and 'mitigation' must not be seen as equal option. Avoidance of environmental impacts should be primary requirement.	458/7681	York Green Party
Paragraph 18.5	Further consideration should be given to concept of 'Mineral Safeguarding Areas'. Some minerals such as coal can play no part in a sustainable future and no further extraction or similar could be envisaged as part of an environmentally sustainable policy during plan period and beyond. . Therefore question setting aside such sites as part of a minerals safeguarding policy (although there may be other reasons not to develop those sites).	458/7682	York Green Party
Context - Local Issues			
Paragraph 18.6	Presume some estimate of likely level of demand will form part of equation.	458/7683	York Green Party

Section 18: Minerals continued

Paragraph etc	Comments	Ref.	Name
Context – You Told Us			
Paragraph 18.7	Sites should only be approved to meet local /regional needs, not for transporting further afield.	458/7684	York Green Party
The Preferred Approach			
General	Should be made clear that Minerals sites are subject to the rigours of the PPS25 Sequential Test. Should be included under the “Preferred Approach” text. Additionally, the fourth bullet point under paragraph 18.7 that allocations should be informed by the SFRA should be incorporated into the Preferred Approach.	5/7160	Environment Agency
Paragraph 18.9	Support wording, which should form part of policy.	458/7685	York Green Party
Strategic Objective	Not convinced should aim to meet RSS Sand Gravel & Brick Clay requirements as these are predicated on excessive levels of economic growth.	458/7686	York Green Party
Targets	See response to Strategic Objective above. Support 2 nd target. Should be detailed as part of Sustainable Building SPD. Add, “ Ensure that resource extraction does not compromise any of the other strategic objectives in this document ”.	458/7687	York Green Party
Policy CS17	Wording of policy needs to be more detailed and specific. Support all suggestions in Sustainability Appraisal, e.g. re word ‘significant’.	458/7688	York Green Party
Question 18			
	No	198/7293	The Helmsley Group
	Agree.	218/7412	Northern Gas Networks
	Annex 3 to MPS1 requires identification and provision of a framework for safeguarding quarries (both active and disused), which are considered to have potential to provide material for repair of historic buildings and structures within area. Not known to what extent this resource exists within York area, but if there are such quarries in plan area, LDF should include an appropriate policy framework for their management.	242/7435	English Heritage
	See response to paragraph 18.5 (Ref 458/7682)	458/7689	York Green Party
	Section should reflect that where possible transfer of minerals should avoid SRN.	2434/7855	Highways Agency
	Support.	2527/7958	Diocese of Ripon and Leeds
		2528/7982 2537/8006 2688/8030	The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.

Section 19: Delivering New Infrastructure

Paragraph etc	Comments	Ref.	Name
General			
	Will need firming up in period up to publication. The table at the end of the document will provide a good basis for a clear delivery plan. Should be clear for at least the first 5 years of the plan what infrastructure is required, who is going to fund and provide it and how it is to relate to the rate of development, with key partners signed up for such infrastructure provision. Critical dependencies need to be identified and it may be appropriate to break down infrastructure requirements into essential and desirable categories. Where an element of the plan is critical but delivery is uncertain, the plan should deal with the 'what if' question'. Need to make sure that implications of uncertainty are taken into account. The degree of uncertainty may be reduced with time and this is a matter that should be expressly considered in the monitoring section.	1/7118	Government Office
	Section 20 states that each objective will be monitored. How would this section, which does not have any objectives, be monitored?	320/7461	Yorkshire Water
	New opportunities for investment welcome, but decisions on value of planning obligations need to be carefully balanced so as not to put at risk specific investment project.	373/8226	Visit York
	Should there be something stronger regarding links between development and learning and skills – see response to Section 11 General (Ref 2686/8116).	2686/8117	Higher York
Context - Planning Obligations			
Paragraph 19.8	Support continued inclusion of drainage and flood protection measures within advice note.	320/7458	Yorkshire Water
	Include land contamination, as this is a material planning consideration.	2291/7836	CYC Environmental Protection Unit
Paragraph 19.8 - 19.9	Support inclusion of items on new list. Renewable energy schemes could be added. Not clear if list is comprehensive or just indicative. Presumably developer contributions could be accepted to other specific purposes if agreed.	458/7690	York Green Party
Paragraph 19.9	Include Low Emission improvement measures	2291/7837	CYC Environmental Protection Unit
Context - Tariffs & Standard Charges			
Paragraph 19.10	Not convinced of appropriateness of standard charges or tariffs. May be useful as an indicative guideline but there are cases, particularly with larger development where firm negotiations should secure best possible outcome for local community and not be undermined by a list of standard charges or tariffs. No guarantee that money paid into fund will necessarily ensure sustainable development or effectively mitigate impacts of specific developments.	458/7691	York Green Party

Section 19: Delivering New Infrastructure

Paragraph etc	Comments	Ref.	Name
Context - Community Infrastructure Levy			
Paragraph 19.11	CIL is not a suitable method to recover drainage and flood risk contributions. Funding would be required for feasibility studies to be undertaken to cost each individual scheme for every site proposed to be allocated, who would fund this? Yorkshire Water would be unlikely to fund investment to allow a development to progress knowing that may not recover full costs for 15-20 years. A combination of mechanisms is required as many infrastructure providers have different investment procedures and different legislation for implementing schemes. Current procedure of planning obligations is appropriate mechanism for Yorkshire Water.	320/7459	Yorkshire Water
	Primary function of well-negotiated developer contributions should be to fully mitigate negative effects of development both within development itself and in immediate locality and to provide it on a strict timescale in conjunction with development itself. Current S106 agreements provide for requirements that mitigation must be completed before various aspects of development can go forward. Would not wish to lose this. Danger that rolling fund will: - Suffer delays in timescales as it becomes necessary to wait for funds from different quarters to become available; Take money away from specific localities where developments have taken place; Suffer from general inertia. Rolling fund will have to be transparent and its relationship to Council budgets made very clear. Should be principle of retaining certain developer contributions to be spent in local areas. There is a danger that a fund can become a way of replacing public investment with private funding. Distinction should be made between public funding of things such as schools, health centres etc and funding required to mitigate specific sites where it may well be appropriate for both developers and Government to make significant contributions e.g. York Central.	458/7692	York Green Party
The Preferred Approach			
Paragraph 19.13	Believe a combined approach as suggested might possibly meet concerns, but would want to see more flexibility retained to negotiate obligations regarding specific sites, not only in respect of affordable housing.	458/7693	York Green Party
Paragraph 19.15	Support idea of 'open book' approach to argue for non-viability. Full and independently verified financial assessments should be required and non-viability argument only accepted in very special circumstances. Support final sentence of paragraph. Requirement to provide highest levels of environmentally sustainable design should also be discounted in negotiations.	458/7694	York Green Party
Policy CS18	Pleased to see Council embracing new legislation and the opportunities it presents but understand that CIL charges will need to be set out in a DPD (rather than SPD) and will have to be subject to Public Examination. Need to reflect the agreed approach at submission.	1/7120	Government Office

Section 19: Delivering New Infrastructure continued

Paragraph etc	Comments	Ref.	Name
The Preferred Approach			
Policy CS18 continued	Would like to see this policy strengthened to ensure appropriate infrastructure is either in place or can be put in place to ensure development can be served. Amended policy should read: - "New development will be supported by appropriate physical, social and economic infrastructure provision. New development will not be permitted unless infrastructure required to service the development is available or the provision of infrastructure can be co-ordinated to meet the demand generated by the development. "	320/7460	Yorkshire Water
	Object to policy being applied inflexibly as might prejudice preparation of York Northwest AAP and masterplan based on ongoing site-specific investigations/considerations.	525/7537	Associated British Foods plc
	Approach not consistent with PPS12 as policy drafted prior to assembly of appropriate evidence base. Absence of evidence base is a specific issue with regards to clarification of strategic sites and major development opportunities identified at page 26 of document. Identification of existing and required infrastructure for these sites is an important element to enable their evaluation as sustainable locations for development. Main thrust of document indicates that sites for major development have been identified without appropriate evidence base to underpin a robust selection.	606/7773 610/7795	Jennifer Hubbard Mr G E Wright
	No recognition of need to work with developers to determine appropriate level of infrastructure provision. Should be reworded to "The Council will work with infrastructure providers, developers and other delivery agencies".	2542/8093	The Moor Lane Consortium
Question 19			
	Support use of planning obligations and Community Infrastructure Levy to help fund the creation and management of green infrastructure.	4/7139	Natural England
	Welcome CIL approach to help finance infrastructure, in particular Green Infrastructure, which will help mitigate and adaptation of climate change as well as contributing to SuDs.	5/7161	Environment Agency
	Support planning obligations and a Community Infrastructure Levy.	49/7198	Yorkshire Wildlife Trust
	Sections 19 and 20 could be amalgamated into one delivery chapter, as demonstration of delivery is key to achieving a "sound" Core Strategy at Examination. Concerned that there is no reference within section 19 to preparation of an Infrastructure Delivery Plan to support the Core Strategy. It is insufficient to simply state within Policy that new development will be supported by appropriate physical, social and economic provision, and that contributions will be sought from developers to ensure that necessary infrastructure is in place to support development. In accordance with guidance in Circular 05/2005, appropriate to have an overarching policy within Core Strategy concerning planning obligations, with detail to be set out in a subsequent SPD, however provision to be made for infrastructure (who, what, where, when) needs to be set out in a separate Infrastructure Delivery Plan, which has still to be reviewed and commented on.	214/7347 621/7393	Network Rail National Museum of Science & Industry

Section 19: Delivering New Infrastructure continued

Paragraph etc	Comments	Ref.	Name
Question 19			
	b) None.	218/7413	Northern Gas Networks
	Need to establish, through an Infrastructure Plan or equivalent, what appropriate levels of infrastructure will be to support proposed level of development within district over the plan period. Will help to inform at what level different development proposals will be expected to contribute to these improvements. In principle, imposition of standard charges or tariffs, either through SPD or use of CIL would enable developers, particularly on housing sites, to establish land values and deliverability on a much clearer basis. Must also be tied into emerging viability appraisal of affordable housing delivery, since would likely be operated outside of any standardised charges and would be influenced, in terms of viability, by rates at which these standard charges are applied. Any further details clearly cannot yet be assessed and would need to be supported by robust evidence base and Infrastructure Plan, which establishes requirements for York and forms basis on which such contributions could expect to be made.	331/7479	Taylor Wimpey (UK) Ltd
	Favour retention of planning obligations to mitigate impact of specific sites. Important that money is spent in locality where development takes place. Important that does not replace mainstream budgets. If concerns can be addressed and combined with some kind of general tariff system might support that. Would like to see inclusion of a tariff specifically to fund authority's own enforcement capacity	458/7695	York Green Party
	a) Planning obligations or tariff/standard charges should be used for funding infrastructure. Principle of standard charge/tariff system is welcomed as it provides clarity and certainty for developers. However, must demonstrate with evidence in each case that contributions sought meet tests of national guidance. A tariff system would remove current unfairness of smaller developments not contributing to infrastructure provision. Objects to use of a CIL. Premature to introduce this at a time when little development is taking place due to economic recession and resulting impacts on market place. Implementation would prevent development due to costs placed upon it. May result in developers not bringing land to market until levy is removed or infrastructure scheme identified have already been provided by levy paid by other landowners. b) If Council decides to introduce a CIL payment should not be due on commencement of development. This would overburden developers with initial costs before any units have been sold. Should agree a date on when levy is paid e.g. when development is complete and is being sold. Recognition that not all development is able to support costs of a planning obligation, tariff or CIL is fully supported. A flexible approach should be adopted to ensure development remains viable and is not overly burdened by infrastructure costs.	515/7508	UK Coal Mining Ltd

Section 19: Delivering New Infrastructure continued

Paragraph etc	Comments	Ref.	Name
Question 19 continued			
	Decisions on introduction of levies and other charges still subject of debate and discussion. Should not pre-empt these by introducing schemes and obligations, which go beyond what is currently permissible in statute and Circular. Express caution about potential for CIL. Regarding obligations should seek to provide for appropriate mitigation genuinely required for development to proceed and appropriately reflect tests contained within Circular guidance.	546/7709 2510/7880	Miller Homes Ltd Taylor Wimpey UK Ltd
	Impact on local air quality of proposed future development needs to be mitigated through a LES approach. Preventing and minimising increases in emissions of oxides of nitrogen through implementation of low emission control measures on sites should be preferred approach. Where not possible developers will need to contribute towards low emission measures elsewhere in city. How this will be achieved requires further discussion and consideration.	2291/7838	CYC Environmental Protection Unit
	Would like to work with Council to establish what transport infrastructure is required to deliver LDF aspirations and understand how these will be funded. There is a general presumption that there will be no capacity enhancements to accommodate new developments.	2434/7856	Highways Agency
	a) Much uncertainty over nature and content of standard charges, a standard tariff system or CIL. Progressing a SPD on Infrastructure and Developer Contributions, which tests various mechanisms for typical development scenarios would be welcomed to ensure that contributions are relevant, necessary, directly related to proposed development, fairly and reasonably related in scale and kind and reasonable in all other respects.	2500/7868	Northminster Properties
	Planning obligations should accord with Annex B to Circular 05/2005. Oppose use of standard charges or tariffs for this reason but if the CIL is introduced in national policy would support its appropriate use. In such an event suggest that types of financial contributions sought should be revised.	2527/7959 2528/7983 2537/8007 2688/8031	Diocese of Ripon and Leeds The Ellerker Family Lancaster; Philiskirk & Sons Ltd; Burneston Family D Barstow Esq.
	a) Still much uncertainty over nature and content of standard charges, a standard tariff system or the CIL. Progressing a SPD on Infrastructure and Developer Contributions which tests various mechanisms for typical development scenarios would be welcomed to ensure contributions are relevant, necessary, directly related to proposed development, fairly and reasonably related in scale and kind and reasonable in all other respects.	2685/8113	Mr F R Pulleyn
	Affordable housing appears earlier with no viability testing and paragraphs 19.8 and 19.9 seek to create a lengthy shopping list of S106 requirements with no real test of viability. CIL proposal should appear as a DPD and not an SPD, enabling proper testing and examination in public.	2689/8163	Monks Cross North Consortium

Section 20: Monitoring and Delivery

Paragraph etc	Comments	Ref.	Name
General			
	See response 7/7118 in Section 19 General	1/7119	Government Office
	Guidance indicates that Core Strategy should include a framework for private investment and regeneration that promotes economic, environmental and social well-being for area. Framework should be more explicit.	190/8282	University of York
	Support approach of continuous review. Question some of indicators in final table. Format useful reference but would have greater value if was referenced back to relevant pages or section heading to check on supporting evidence and rationale.	458/7696	York Green Party
	Concept of a LES needs to be incorporated into strategic objectives and targets. E.g.: - Section 6: Reference needs to be made to low emission transport as well as sustainable transport. Should be objective relating specifically to reducing / minimising emissions from site. Section 12: Should be reference to need to protect local air quality, perhaps linked with progressing idea of freight transshipment. Section 13: Mention need to encourage use of low emission vehicles. Section 15: Mention need to protect local air quality as well as reduce carbon emissions and recognition of impact this might have on choice of energy generation.	2291/7839	CYC Environmental Protection Unit
	Little mention of involvement of key stakeholders, landowners and developers. Involvement of business community necessary in understanding deliverability of sites and more emphasis should be given to need for collaboration between policy makers and key stakeholders.	2500/7869	Northminster Properties
Paragraph 20.2	Stakeholders'/delivery partners' role in delivery of strategy should be acknowledged in each of key themes for delivery of Vision.	190/8283	University of York
Delivery			
Table	Section 8: Housing growth, Distribution, Density, Mix and Type Target - 4 th bullet point - object to 60% of homes being delivered over plan period being housing given the SHLAA and other parts of Core Strategy state a requirement of 70% houses. Should be reworded to "At least 70% of homes delivered over the plan period will be houses rather than flats."	2542/8094	Moor Lane Consortium

Annex B - Sustainability Appraisal Chapter Summaries

Paragraph etc	Comments	Ref.	Name
General			
	Would like to see all outstanding recommendations that have not been addressed in preferred options report prominently itemised under relevant section headings.	458/8252	York Green Party
	Throughout SA impacts on carbon emissions and local air quality need to be considered as separate issues and areas of potential conflict highlighted. Use of a LES approach should be acknowledged as a suitable means of addressing potential conflicts between two issues.	2291/8270	CYC Environmental Protection Unit
Section 2: Vision and Objectives - A Leading Environmentally Friendly City			
	No recognition of potential conflicts between carbon/eco footprint reduction and local air quality improvement. Potential for conflicting policies needs to be recognised and a LES highlighted as a means of avoiding such conflict.	2291/8257	CYC Environmental Protection Unit
Section 3: The Spatial Strategy			
SP1 - A Sustainable Settlement Hierarchy	One of bullet points under SP1 reads "promotes a reduction in greenhouse gas emissions helping towards cleaner air quality and managing climate change". Reducing emissions of greenhouse gases does not always assist in reducing emissions of local pollutants. Further development will need to be carefully controlled in terms of emissions of oxides of nitrogen due to potential for more emissions from both buildings and vehicles. These must be kept to an absolute minimum through active implementation of a LES. Essential to prevent further deteriorations in local air quality and extension of existing AQMA. Care also needs to be taken to prevent an increase in number of people exposed to poor air quality through infilling of space within existing AQMA. Potential conflicts with EN5 should be highlighted.	2291/8258	CYC Environmental Protection Unit
SP2 - Areas of Constraint	Under SP2 there is no comment made on compatibility with EN5. Need for a LES type approach needs to be highlighted.	2291/8259	CYC Environmental Protection Unit
SP3 - Approach to Future Development	Under SP3, reducing emissions of greenhouse gases does not always assist in reducing emissions of local pollutants. No recognition of impact large-scale development could have on local air quality. Should be flagging this up as a potential issue and supporting idea of a LES.	2291/8260	CYC Environmental Protection Unit
Section 5: York City Centre			
Policy CS2	Measures to reduce greenhouse gas emissions have been assumed to have a positive impact on local air quality. Potential conflicts need highlighting and need for a LES approach included.	2291/8261	CYC Environmental Protection Unit
Section 6: York Northwest Area Action Plan			
Policy CS3	In context of York Northwest, disagree that standards such as BREEAM and Code for Sustainable Homes should be included in Core Strategy. These should be given due consideration based upon site-specific considerations and would be more appropriately dealt with through AAP and masterplanning of sites.	525/8256	Associated British Foods plc

Annex B - Sustainability Appraisal Chapter Summaries

Paragraph etc	Comments	Ref.	Name
Section 6: York Northwest Area Action Plan continued			
Policy CS3 continued	SA pays no regard to potential impact on local air quality of large-scale development on site. Also states that meaning of an exemplar sustainable community is not clarified. An opportunity exists here to link idea of an exemplar sustainable community to a low emission community.	2291/8262	CYC Environmental Protection Unit
Section 8: Housing Growth, Distribution, Density, Mix and Type			
Policy CS5	No comment made on compatibility with EN5. Need to make a link between sustainable energy provision and need to protect local air quality.	2291/8263	CYC Environmental Protection Unit
Section 10: Access to Services			
Policy CS8	No recognition of potential impact on local air quality of new large scale developments such as schools, sports facilities etc.	2291/8264	CYC Environmental Protection Unit
Section 11: Future Growth of York Economic Sector			
Policy CS9 & CS10	No comment made on compatibility of either policy with EN5, particularly in relation to generation of additional transport and creation of outdoor entertainment spaces	2291/8265 2291/8266	CYC Environmental Protection Unit
Section 12: Retail Growth and Distribution			
Policy CS11	Rightly points out additional retail could damage vitality of existing shopping streets. Additional competition from new retail centres would be detrimental to vitality and viability of traditional shopping streets as part of York's Historic core. Fails to mention Newgate Market and occasional Farmers' Markets in Parliament Street as a more sustainable option for expansion.	458/8253	York Green Party
	Anticipated reduction in greenhouse gas emissions wrongly linked to local air quality improvement. Needs to be more emphasis as to how retail growth will be managed in accordance with requirement of EN5 i.e. links to LES and possible introduction of freight trans-shipment centres.	2291/8267	CYC Environmental Protection Unit
Section 13: Sustainable Transport			
Policy CS12	No recognition of need to balance carbon reduction with local air quality improvement in relation to type of vehicles and fuel choices for city. There is also no recognition of need to go beyond provisions of LTP2 to achieve real improvements in local air quality. A LES should be mentioned in this section.	2291/8268	CYC Environmental Protection Unit
Section 15: Resource Efficiency			
Policy CS14	No consideration of how this policy fits with EN5. Under 'social' heading stated "there will be positive benefits on health through use of renewable technologies". This is not always case where biomass burners are used. Needs to make reference to balance between reducing carbon emissions and improving local air quality	2291/8269	CYC Environmental Protection Unit

Draft Consultation Statement & Schedule of Responses (2010)

Planning York's Future Questionnaire (a number of respondents answered the questionnaire by letter, rather than by completing the leaflet. These could not be analysed with the other questionnaire responses and are therefore set out below).

Paragraph etc	Comments	Ref.	Name
Question 1	Theme 4 should be amended to <i>York's special Historic, Built and Natural Environment</i> .	55/7200	CPRE (York and Selby District)
Question 2	Question capacity of existing and planned infrastructure to absorb the continuation of the past trends in job creation and therefore consider that the annual predictions should be lowered. Essential that optimum balance between unfettered economic expansion and quality of living is determined. More research and analysis is required to establish implications of endorsing predicted employment forecasts.	55/7201	CPRE (York and Selby District)
	Suggests public can request an alternative amount of job creation employment land to that required by RSS. Fails to provide sufficient detail.	2689/8128	Monks Cross North Consortium
Question 3	Reject the "predict and provide" approach and advocate planning forecasts for housing should be based on need rather than on demand. A realistic assessment of need - not demand - would suggest a significantly lower figure than 850 dwellings per year.	55/7202	CPRE (York and Selby District)
	Objects to question, which seems to be an attempt to elicit public support to deliver fewer homes than target, set out in RSS. Impact of recession should not be used as an excuse to renege on delivering against these targets. Instead, should explore a range of mechanisms and policy measures that will help bring development forward. As well as providing much needed housing, maintaining delivery is also critical to encouraging growth of a more diversified economy in area and providing employment.	165/7272	Home Builders Federation
	Suggests housing targets can be modified away from RSS in light of current downturn. Not a matter for LDF. All recent statements on this inform that cycles in housing markets will always happen but these dips should not be used as an excuse to plan for lower levels of housing delivery. Need for housing does not disappear during a recession. Question is contrary to RSS. Question on windfall allowance is contrary to PPS3 and should not be included in a consultation paper.	2689/8129	Monks Cross North Consortium
Question 4	Consider national guidance on windfall sites should be noted but should incorporate an element of unidentified sites when assessing land availability. Previous plans have always underestimated what will emerge and consider it would be realistic to base probability on an extrapolation of actual experience of last ten years.	55/7203	CPRE (York and Selby District)
Question 5	Support concept of increasing current densities providing that planning control policies are framed to prevent developments, which are detrimental to York's Special Historic, Built and Natural Environment.	55/7204	CPRE (York and Selby District)
	This is a matter for evidence base to determine. SHMA calls for a better mix with more family housing with gardens, which implies fewer dense apartment schemes. This should not be ignored and certainly not discarded in an attempt to preserve a "draft" Green Belt.	2689/8130	Monks Cross North Consortium

Planning York's Future Questionnaire

Paragraph etc	Comments	Ref.	Name
Question 7	This is an emotive question on need to use greenfield sites and will clearly result in more people requesting draft Green Belt be retained/protected. Fails to fully explain land supply shortfall and consequence of not supplying enough housing (e.g. increased prices; town-cramming; increased sharing/over-occupation; outward migration with increased commuting).	2689/8131	Monks Cross North Consortium
Question 6 to 8	Support criteria proposed for designation of Green Belt and recognise some encroachment into currently classified Green Belt land may be necessary as supply of brownfield sites diminishes. Accept that sites identified at Monks Cross and Metcalfe Lane may well have to be allocated for housing at some time in future. However strongly urge that a Plan, Monitor and Manage policy be adopted which will avoid any significant premature release of housing land.	55/7205	CPRE (York and Selby District)

Sustainability Appraisal

Paragraph etc	Comments	Ref.	Name
General			
	Welcomes thorough appraisal, which is fit for purpose.	4/7141	Natural England
2 Sustainability Appraisal - Stage A Evidence Base and SA Framework			
Task A3: Sustainability Issues - Figure 4	Biodiversity and Built Heritage Section is confusing. Text deals solely with biodiversity, yet bullet points, contain details of City's historic assets - of which no mention is made within preceding paragraph. Historic environment of York is of immense significance. Would have expected it to be identified as a separate sustainability issue. Experience from other LDFs shows that Inspectors use Baseline Information in SA/SEA to justify particular Policy approach in accompanying plan. Essential, therefore, that Section sets out scale and significance of historic environment of City. This amounts to more than simply listing designated historic assets of City. • Historic environment of York recognised as being of national, if not international, importance. ▪ Degree of preservation of archaeological deposits puts in amongst a very small group of places across world. York is one of only five cities whose archaeology is considered to be of such significance that it is designated an Area of Archaeological Importance. ▪ Major centre in both Roman Empire and Viking World. ▪ Minster is one of great gothic medieval buildings of Europe. ▪ City Walls are longest most complete example of medieval walls still standing in country and put it in a select group of Cities in Western Europe. ▪ Evidence of various phases is clearly legible today - in its archaeology, street layout, building plots and historic buildings. • The Minster and city churches contain largest collection of medieval glass in Britain • York has second highest total of high-Grade Listed Buildings in Region. • York has a legacy of buildings and areas associated with chocolate manufacturing. See representation for details. • City has a legacy of buildings and structures associated with its railway heritage. See representation for details. Green Belt This Section misrepresents way in which detailed boundaries should be defined. Green Belt should include all those areas beyond main built-up area of City, considered necessary to keep permanently open to protect its historic character and setting. Only after that task has been completed can process of identifying where assessed development needs might be met should be undertaken. Whilst true that Plan will need to reconcile development needs with protecting historic environment, this is not same as process involved in defining a Green Belt around City.	242/8245	English Heritage

Sustainability Appraisal continued

Paragraph etc	Comments	Ref.	Name
2 Sustainability Appraisal - Stage A Evidence Base and SA Framework continued			
Task A4: SA Framework - Figure 6	Cultural Heritage (EN2), 3 rd column - Final bullet point should read special character and setting. Two elements are not, necessarily, same and plan should protect both.	242/8246	English Heritage
3 Sustainability Appraisal - Stage B Appraisal Methodology			
Task B2: Developing the DPD Options - Paragraph 3.6	Nowhere in Topic Paper I is any analysis made of capacity which environment of settlements surrounding York might have to accommodate development. Thus, assessment of what are most "sustainable" locations for further development is somewhat flawed. As impact upon environment is one of key issues that should be assessed in any Sustainability Appraisal, lack of such an analysis must bring into question statements that settlements identified are the "most sustainable".	242/8247	English Heritage
Task B2: Developing the DPD Options - Paragraph 3.7	Given that Council has yet to set out what it considers to be elements, which contribute to special historic character and setting of York, not possible to determine to what extent loss of currently open areas to east of York might have on special character or setting of City. Unclear how peripheral development on north-eastern and eastern sides of York can be reconciled with statement, in Policy CS1, that " <i>areas ... which provide an impression of a historic city situated within a rural setting</i> " should continue to remain open in order to safeguard special character of York.	242/8248	English Heritage
5 Preferred Options Policy Appraisal - Part A: Sustainability Objective Analysis			
Headline Objective: Reduce York's Ecological Footprint	The overall objective to reduce City of York's ecological footprint is welcomed.	479/8254	Yorkshire Forward
Objective EC2	Welcomed. Aligns well with RES and low carbon agenda.	479/8255	Yorkshire Forward
Part B: Core Strategy Policy Analysis			
SP1 - A Sustainable Settlement Hierarchy	Commentary notes potential impact which strategy might have on historic environment of City. As one of recommendations, would expect that assessment be made of capacity of historic environment of City to accommodate further growth (as recommended by RSS EiP Panel).	242/8249	English Heritage
Policy CS5: The Scale of New Housing	At RSS EiP, role that York ought to play in Region took little account of capacity of City to accommodate further growth. Evidence from work which Council needs to undertake in order to establish how much change historic environment of City might be able to accommodate (suggested in response to Question 7) should be used to appraise role which York should be playing in Region in longer term and Policy measures that might be necessary to deliver scales of housing and employment growth envisaged whilst protecting those elements which contribute towards special character of the City. This should be one of recommendations from Sustainability Appraisal.	242/8250	English Heritage

Sustainability Appraisal continued

Paragraph etc	Comments	Ref.	Name
Part B: Core Strategy Policy Analysis continued			
Policy CS9: Future Growth of York's Economic Sector	No evidence has been provided to indicate that scales of development being envisaged are deliverable whilst, at same time, safeguarding special character and setting of City. RSS states economic growth of York <i>"will be delivered without detriment to the historic and natural environment of the City"</i> . At present no mechanisms in place to assess whether likely to be achievable. An environmental capacity study would help to ensure that economic growth is delivered in a manner compatible with preservation of environmental character of York. Should be a recommendation of Sustainability Appraisal.	242/8251	English Heritage
Policy CS10: Culture, Leisure and Tourism	Note 'audit trail' presented on changes made, and advise that for Policy CS10, SA recommends that energy and resource efficiency and climate change adaptation should be referenced in policy, but not picked up in audit trail. Supports recommendation, and suggest that cultural/tourist offer of York could be a driver for uptake of sustainability principles across city. Good quality design, of which sustainable design is a central part, will also help to enhance cultural/tourist offer. Recommendation of SA should not be dismissed.	4/7142	Natural England

Habitat Regulation Assessment

Paragraph etc	Comments	Ref.	Name
4 Habitat Regulation Assessment - Screening Stage			
Table 3	Support inclusion of flood risk.	5/7162	Environment Agency

Topic Papers

Topic Paper 1	Comments	Ref. & Name
	Approach to spatial strategy sets out in a very brief manner why certain sites have been chosen as preferred sites for development in green belt. A more in depth study should have taken place and each of proposed sites should have been rigorously assessed for their green belt value before they are excluded from draft green belt. This assessment should include an analysis of views of Minster from within sites themselves and from ring road. The quality of landscape is not relevant when allocating land to be removed from green belt and a judgement should first be made as to whether land is valuable green belt land. There is no evidence that any evaluation has been carried out on these individual sites and there is no basis for stating that they are 'outside all constraints'. (Topic paper 1 page 29, 31 & 33).	70 Fulford Parish Council
	Page 5, box following Paragraph 1.2 - Given primary purpose of York Green Belt (i.e. preserving the setting and special character of the historic City) it is surprising that no mention is made of this aspect of PPG2. Page 10, Paragraph 1.10 - This box omits one of key policy principles for considering future development in York, need to safeguard special historic character and setting of City. A Spatial Strategy for a City such as York, which does not have this as one of its overarching policy principles, must open itself to potential challenge. Page 11, Paragraph 2.3 refers to ranking settlements according to <i>"their possible capacity for growth"</i>: However, nowhere in Topic Paper is any analysis made of capacity which environment of those settlements might have to accommodate development. RSS EiP Panel made it clear that such an assessment should form part of work on strategy for accommodating development needs of City. They stated: - <i>".... further work needs to be undertaken as part of the next review of the RSS and in work on the LDF to establish the environmental capacity of York"</i>. Page 47 - In Summary there is no meaningful assessment of impact, which development of these areas might have upon York's historic environment. In view of fact that majority of these areas are currently in draft Green Belt, at very least, one might have expected Table to assess sites against Criteria detailed in Paragraph 4.7 of Core Strategy.	242 English Heritage
	Topic paper outlines implications on transport network. Highways Agency has developed a tool specifically for LDF process to assess implications of development on strategic Road Network. This has been demonstrated to members of LDF team on a number of occasions. The Highways Agency would like outputs from this tool to feed into spatial strategy to give an indication of impact on Strategic Road Network. In relation to implications on transport network, worth highlighting there is a general presumption against capacity enhancement to accommodate new development. Agency cannot be expected to cater for unconstrained traffic generated by new development proposals. Such growth would be unsustainable and would restrict opportunities for future development where available capacity is limited. Development should be located in sustainable locations and will expect to see demand management measure incorporated in development proposals.	2434 Highways Agency

Topic Papers

Topic Paper 1	Comments	Ref. & Name
	Objects to approach taken and how Areas “C and I” were selected over client’s site at “Land adjacent to the A1079”. Figure 3.1 states that: Planning permission was approved for a new campus at University of York in 2007, known as Heslington East. Draft local plan identifies land to east of site as a Recreational Opportunity Area, to be brought forward for public access in conjunction with development of Heslington East. Figure 4.5 (in representation) shows red line application boundary for approved Heslington East Expansion and identifies that client’s site is outside planning application boundary. Land is within Lands Improvement’s ownership and as such there is no obligation on client to bring forward recreational opportunity area as part of a Section 106 agreement with planning permission for University of York’s Expansion. Have also taken into consideration Open Space, Sport and Recreation Study (December 2008) and potential as a “Recreational Opportunity Area” as set out by Council. Consultants were appointed to undertake an assessment of City’s open space, sport and recreation facilities. Study highlights priorities for future delivery of open space, sport and recreation facilities across City of York based on an assessment of local needs. Figure 4.6 (in representation) is an extract from Open Space Study, showing locations of various open space typologies. Figure 4.5 shows location of clients land, demonstrating that Open Space Study did not identify it for any priority for future delivery of open space, sport and recreation facilities across City of York. Therefore based on this evidence, which has informed Core Strategy, there is no justification why site adjacent to A1079 cannot be considered suitable as a development opportunity, including for employment purposes. As referred to above and also by referring to Figure 7 and 8 of Core Strategy Preferred Options Report, site lies: • Outside green wedge, river corridor, strays, extension to the Green Wedge (Category 1); • Outside the areas retaining rural setting (category 2); • Outside areas preventing coalescence (Category 3); • Outside Green infrastructure including Nature Conservation Sites • Outside of Flood Risk Zones 3a and 3b Also refer to response to question 3a, which equally applies to this question for release of site from Green Belt. On this basis believe the site to be a suitable location for employment for following reasons: • In a highly accessible and sustainable location and is just 2.5 km from York city centre; • Excellent access to the A1079 and A64; • Strong levels of public transport access (park and ride); • Close proximity to existing / future planned development; • Identified access into the sites south west corner; • Ability for the site to be delivered; and • Potential for synergy and linkages to the University of York campus extension.	2517 Lands Improvement

Topic Papers

Topic Paper 1	Comments	Ref. & Name
	Have fundamental problems with document, as do not consider that evidence presented is robust or sufficient to justify identification of development at Areas of Search A and B alone and subsequent ranking of development. Any assessment of which specific sites contribute to Council's vision needs to be thorough. In absence of a formal SHLAA document believe that Spatial Strategy founded upon contents of Topic Paper cannot be justified. Much of commentary in topic paper is based on assumptions and lacks consistency. For example Area of Search Site F is received less positively than others on basis that development there would give rise to unsustainable out commuting and would be visually prominent. Some of sites which rank, which are clearly less sustainable and more poorly related existing and proposed infrastructure are considered more so within topic paper. Site E is considered to have potential good connectivity to tram train for access to Central Business District; no such judgement is made for Area F. Yet within assessment of Area of Search F's accessibility no regard appears to be given to forthcoming park and ride to west of A1237, York Northwest, proposed improvements A59 inside A1237 and tram train, all of which would conspire to enhance sustainability of proposals here to a level far beyond that of sites to east of City. While significant local employment assets at Upper Poppleton and Northminster would be further enhanced by 82,000 sq metres of employment proposed as part of York Northwest and proposed employment at Area of Search I. Likewise Council's assessment of land at Area of Search G and Strensall has no regard to proximity York Scarborough Line and potential this provides. Despite this, sites A and B, which are all inferior in terms of possible public transport accessibility are all considered more sustainable within Topic Paper and are ranked ahead. Concerns over visual impact of sites E, F and G development appear unfounded and consider that too much weight is attached to this bearing in mind findings of Green Belt Review and absence of any local landscape designations on this land. In this respect do not consider sites E, F and G to be inferior to sites A and B. Also Area of Search Site F does not contain Grade 1 agricultural land as stated. PPS3 and RSS policy YH7 offer support for proposals that can 'piggyback' on existing and proposed infrastructure and investment to lessen burden created by bringing land forward. Within assessment of sites carried within topic paper, little regard appears to be paid to already planned infrastructure improvements or indeed contribution sites (part of) E, F and G and others including Strensall can make to balanced and sustainable growth of city. Reflecting this consider manner in which areas of search have been assessed should be reconsidered.	2527 Diocese of Ripon and Leeds 2528 The Ellerker Family 2537 Lancaster; Philiskirk & Sons Ltd; Burneston Family 2688 D Barstow Esq.

Topic Papers

Topic Paper 1	Comments	Ref. & Name
	Paragraph 2.14 suggests that only land within outer ring road should be considered, for purposes of spatial strategy, in its capacity for urban extension. Paragraph 2.14 then seeks to justify this in terms of helping to maintain York's compact form and suggests that physical separation would result in land outside outer ring road not benefiting from similar sustainability from access to goods and services. This aspect of Core Strategy is not supported. Limitation of planning new development within outer ring road is not consistent with Topic Paper figure 2.3 for following reasons: - If development is to be limited to within outer ring road there is no need to identify areas for "extension of green wedge" which all lie outside outer ring road; Identification of "Areas retaining rural setting" all lie within outer ring road and could equally be applied to all currently undeveloped areas lying between existing urban edge and outer ring road; There are locations where outer urban edge extends out as far as outer ring road and therefore development in areas beyond outer ring road, which are not limited by other constraints and which abut current urban edge, such as at Clifton Moor, would benefit equally if not more from access to goods and services. It is also of note that Core strategy is advocating extension of Northminster Business Park, which lies outside outer ring road, which is contrary to case set out in paragraph 2.14 of Topic Paper and is a tacit acknowledgement that delivery of future development needs of York will necessitate development beyond outer ring road. If Core Strategy imposes a carte blanche restriction on development outside outer ring road it immediately places constraints on ability of Allocations DPD to identify and allocate sufficient and sustainable sites for development, whilst not needing to compromise other identified constraints. Limitation of future development within outer ring road will also result in further urban cramming and prejudice historic character and setting of York which is in conflict with Spatial Principle 2 ii) of Core Strategy.	2698 Commercial Estates Group and Hallam Land Management

Topic Papers

Topic Paper 3	Comments	Ref. & Name
	Request that Figure 1, areas of delay and congestion 2030, be updated to reflect information in Network Analysis Tool for A64. Map currently shows no capacity constraints on A64 links, although all junctions are highlighted as approaching or over capacity. Screen shots of Network Analysis Tool for AM and PM peak are included in response. Show that in AM peak A64 link between A1079 and A1237 (E) is stressed in an easterly direction and in PM peak A64 link between A659 and A1237 (W) is approaching capacity. Topic paper makes no mention of use of travel planning. Travel plans are an integral part of planning process and an essential measure to mitigate impact of traffic generated by new development. Requests that future versions of Core Strategy and topic paper include reference to Travel Plans outlining a firm commitment by developers and occupiers to reduce number of single occupancy car trips generated by, or attracted to, their site.	2434 Highways Agency
	Preferred Areas of Search sites A and B have been reviewed in relation to Moor Lane site with respect to information included in Topic Paper. Sites proposed as Areas of Search to west of York have been discounted as sites A and B are considered to generate a higher proportion of walking and cycling trips. Not clear in Topic Paper what areas to west of York have been used in this assessment. However, from a detailed assessment of 2001 Census Mode Split data for both sites A and B and Moor Lane, overall proportion of trips by car is generally similar for all three sites at approximately 60% (Moor Lane 59.6%). Whilst area surrounding Moor Lane has a lower proportion of walking and cycling trips compared to sites A and B it also has a higher proportion of trips by public transport (13.3% compared to 10% and 8.7% for sites A and B respectively). Proposed Moor Lane site is considered to be equally as sustainable as either of Preferred Areas of Search for access by sustainable modes. Also refers to distribution of journey to work trips for proposed Areas of Search. It concludes that sites A and B would generate a higher proportion of trips within York area that could be accommodated by sustainable modes. Again, a review of available Journey to Work census data has been carried out for each of sites. Whilst Moor Lane site does generate a lower proportion of trips within York, sites A and B still generate a significant proportion of trips outside York area (approximately 24%) and majority of these trips would be assigned onto ring road. Although census data shows a higher proportion of trips towards Leeds from Moor Lane area compared to sites A and B these trips would be added to southern section of ring road, which is predicted to operate with spare capacity as shown in Figure 1. However, trips from sites A and B to areas outside York are likely to be routed via congested northern section of A1237 or via Hull Road junction, which is predicted to operate over capacity. Topic Paper suggests there would be no impact at Hull Road junction from either of preferred sites, however it is likely that site B would result in additional trips through junction to areas outside of York. Therefore considered Moor Lane site would not result in any greater impact on ring road than preferred sites. Given likely distribution of trips from Moor Lane site it is also considered that conclusion in Topic Paper that sites to west of York would require significant capacity improvements is not accepted as highway network in vicinity of site is not predicted to experience any significant capacity issues (based on Figure 1). In addition, capacity improvements have been provided at junction of Moor Lane/ A1237 and further capacity improvements at ring road junctions are proposed at A59 junction as part of Access York Phase 1 proposals. Any existing capacity issues are therefore likely to be mitigated by scheduled improvements to network.	2542 Moor Lane Consortium

Topic Papers

Topic Paper 3	Comments	Ref. & Name
	Proposed extension to Askham Bar P & R site also likely to reduce existing traffic levels on Tadcaster Road corridor and thus improve access between Moor Lane site and centre of York. Therefore considered unlikely that Moor Lane site would require greater levels of mitigation on surrounding network compared to Areas of Search A and B. A comparison of public transport accessibility of the 3 sites has been undertaken using Accession modelling software. - Shows that public transport accessibility for site A is restricted to north east of York and that large areas to south and west of city centre are not accessible within a 60-minute journey time. Site B has a wider catchment than site A, extending northeast towards Malton, although areas to west and north of York are also outside 60-minute catchment. Finally Accession output for Moor Lane site shows that some areas to north and east of city centre are outside a 60-minute journey time although large areas adjacent to A64 corridor towards Leeds are within 60 minutes of site. Overall Accession assessment of Moor Lane site shows a similar or better level of public transport accessibility compared to Sites A and B. Based on this, consider Moor Lane site comparable to Sites A and B in terms of accessibility by sustainable modes and level of impact on surrounding network and is therefore an appropriate site for allocation as a preferred Area of Search.	2542 continued
	Does not explain assessment of alternative areas of growth outlined in Topic Paper 1 and how findings have informed selection of Monks Cross and Metcalfe Lane as preferred urban extension locations in transport terms. Disappointing that brief appears to have either been toned down or retrospectively prepared following selection of preferred sites. Model used to assess future transport network includes all known housing and employment land supply identified in Preferred Options, an allowance for windfall sites and certain transport improvements including those schemes proposed as part of LTP2 and Access York (phase 1). Does not include upgrade to all seven roundabouts along A1237 ORR, which are one of key transport schemes outlined in Policy CS12 of Core Strategy to occur between 2011-2021. Para. 5.8 states that transport improvements will include all schemes proposed in medium to longer term. It is therefore surprising that works to ORR roundabouts have been excluded given they are planned for this period. This distorts picture of where capacity exists on ORR at busiest time of day as shown in Figure 1. Consequence is to select locations away from areas along this route where there is no free capacity, i.e. to east of City. Similarly, no real evidence presented giving clear indication of projected trip distribution and trends across city excluding extension sites. Table under para. 6.5, acknowledges westerly direction of journeys to work from housing in east. However, little else presented that gives clear indication of trip distribution around city. Also confusing that in observing a general westerly flow of traffic across York that Council view an eastern extension as a sensible solution to City's growth pressures. Relationship that York has with Leeds and rest of city region for living and working is important to both preservation of its environmental and cultural heritage and its economic prosperity, yet conclusions reached in this paper view this to be a negative issue. If there remains reluctance to accept York's wider role alongside its regional partners in planning for its growth both in planning and transport terms, this will be to detriment of historic fabric, its population, infrastructure, environment and economic wellbeing. Should undertake new modelling exercise, which truly represents existing patterns, proposed highway improvement schemes and new/projected patterns as a result of any one of 9 areas of search, or a combination of these, being developed. Without this evidence is a risk that relevant policies in Core Strategy could be found unsound.	2698 Commercial Estates Group and Hallam Land Management

8: Summaries of the Conference Events

8.1 This includes a summary of the comments made at:

- the one day conference on 28th July 2009, for interest groups, members of the Talkabout Panel (York Citizens Panel) and developers;
- the half day workshop on 21st September 2009, with key stakeholders on affordable housing issues;
- an evening workshop held on 28th September 2009, involving the York Professionals and York Business Forum; and
- at a half day workshop on 8th October 2009, with the Inclusive York Forum.

These write-ups were compiled and sent out to attendees following the events.

**Local Development Framework Core Strategy Conference
Friends Meeting House
Tuesday 28th July 2009
Feedback****1.0 INTRODUCTION**

- 1.1 The conference held on Tuesday 28th July 2009 at the Friends Meeting House in York was one of a series of events that have taken place over the summer as part of the Core Strategy Preferred Options consultation, which will inform the submission draft stage in the production of this key document in York's Local Development Framework. The aim of the following note is to broadly capture the diverse range of views and opinions of those who attended the event. It should be noted that the views expressed in this note are of those who attended the conference and not necessarily the views of City of York Council.

2.0 PROGRAMME

- 2.1 Upon arrival, attendees were provided with name badges which had different colour dots on them. This split the attendees into three groups – developers (red/yellow), interest groups (green) and residents (blue). The purpose of this was to allow us to analyse any differences in views and comments raised between the groups. These have been drawn out where relevant.
- 2.2 The day was pitched as informal but structured with the morning session comprising a presentation on the vision and future growth of the city before group discussions on the vision and spatial strategy sections of the emerging Core Strategy. During the afternoon session attendees took part in three workshop sessions on 'Design and the Historic Environment', 'Green Infrastructure' and 'Sustainable Transport and Access'.
- 2.3 Feedback from all sessions during the day is provided below. Throughout the note the 'group' is often put forward as a single body, however it is important to acknowledge that many of the points that follow may have come from individuals within the groups. Accordingly, the comments below do not represent the collective view of the group, rather the range of comments raised by various members of the groups as discussions evolved.

3.0 MORNING SESSION

- 3.1 Following a presentation from Dave Caulfield and Martin Grainger, which provided the context to the approach to future growth in York, attendees were asked to comment on the elements contained in the vision and whether other elements should be added. Alongside this, views were sought on specific elements of the approach to the spatial strategy and the preferred areas of search.

Feedback from Group Discussions***Vision******Developers (Red/Yellow)***

- 3.2 It was felt that the Vision should incorporate a strong encouraging statement as the planning process should be a positive one and growth is a positive part of the city's

evolution. It was stated that York will have to grow and that the vision must be a positive tool. Historic cities can take growth and the city has evolved through growth. It was suggested that wording used by CABE (as covered in the morning's presentation) be incorporated into Core Strategy to emphasise that growth can be good for the city, and that it is the quality of growth, design and infrastructure that is crucial.

- 3.3 The group disagreed with the analysis which informed the vision and that the historical development of York in the national/ regional context has been misunderstood. It was stated that prior to the industrial revolution York was the second most important city, it fell behind in the industrial revolution and therefore had a lack of significant growth. It was suggested that post industrialisation York could return to become the second most important city with an opportunity to expand to overtake Leeds in the regional hierarchy of cities. Accordingly it was felt that we should contemplate growth of over 1 million people by the end of the century, although it was noted that there is a lack of political will to face the growth levels necessary. It was also stated that historical growth is no measure as the Green Belt has strangled expansion. The group suggested that if we miss this opportunity then York will fail to rise again within the hierarchy of settlements.
- 3.4 It was felt that the vision is not objectionable and it is therefore difficult to disagree with any of the points, although it was suggested that they could perhaps be ranked to give priority within the areas or the statements should be split out between generic aspects and specific elements. The Vision also needs to harness planning and deliverability, for example Germany Beck has been on the table for 25 years. It was suggested that flexibility towards brownfield and greenfield land needs to be built into the vision to reach deliverability.
- 3.5 There was disagreement with the wording within the vision to refer to York's 'role' as it was felt that this was predefined. There were questions raised as to who has defined this role and if this was under discussion or already determined. It was also considered that 'York's character and historic setting' should be included as two separate things as it is not adequately clear in terms of the approach to historic villages.
- 3.6 It was asked whether the Core Strategy will set the green belt boundary too because we need to be bolder about the Green Belt, which is recognised as being a hugely emotive issue, but questions were raised as to how accessible York is due to the Green Belt. Again, the Green Belt concept should be positive, not negative, it gives open space/parks within the ring road and beyond the ring road protecting the green setting of York.
- 3.7 There was discussion around the retail element of the Vision under the 'Prosperous and Thriving Economy' heading, particularly with regards to supermarkets. Questions were raised as to whether it was suitable for supermarkets to be located within the town centre or placed nearer to the majority of where residents actually live.

Interest Groups (Green)

- 3.8 The group felt that a strong high level theme currently missing is that of the need for us to live within environmental limits which is particularly important in light of the peak oil crisis. We should also rethink use of 'environmentally friendly' terminology which the group did not like. It was suggested that there should be more emphasis on the

natural environment as well as the built environment within the Core Strategy and a simple improvement would be to refer to 'natural environment' in the Vision.

- 3.9 Given that York is one of only a handful of Areas of Archaeological Importance in the country it was felt that archaeology should be more strongly referenced in the Vision. Reference to aspirations to create mixed and cohesive neighbourhoods should also be made in the vision, describing the role of the plan in placemaking terms rather than purely as delivery of homes and jobs etc. There is also a need for the Council to champion highest quality development.
- 3.10 Views were expressed regarding air quality which was not considered to have been adequately addressed at a strategic level given that development on the scale discussed in the LDF should consider impact on pollution etc. Would be appropriate to require all new major sites to be delivered within specified air quality targets, such as York North West Area Action Plan.
- 3.11 The group felt that the means of delivering the Vision has not yet been adequately set out, particularly the capacity of existing infrastructure to accommodate additional growth (sewage and transport were mentioned) and the impact improvement measure may have on archaeology.
- 3.12 Overall, the Council have to ensure that the aims and objectives are carried through to development as it occurs on the ground.

Residents (Blue)

- 3.13 Whilst there was strong support for the 'York's Special Historic and Built Environment' element of the vision the group had mixed feelings towards the other elements. Under the 'Building Confident, Creative and Inclusive Communities' element there was strong disagreement with meeting RSS levels of housing provision and setting Green Belt boundaries with flexibility to accommodate higher levels if growth is needed.
- 3.14 Whilst there was some support amongst the group in supporting Science City under the 'Prosperous and Thriving Economy' element of the vision there was general disagreement towards York strengthening its roles as a sub-regional shopping and entertainment centre.
- 3.15 With regard to the 'Leading Environmentally Friendly City' element of the vision there was strong support of creating a permanent Green Belt and preserving the special character and setting of York however there was strong disagreement within the group in respect of increasing non-car modes of travel.
- 3.16 The group felt that consideration of an aging population was not fully reflected in the Vision. There should also be a more detailed consideration of housing type, mix and design. A clearer balance needs to be struck between balancing growth and limiting damage to the environment. The types of jobs York wants to have in the future should be addressed, and it should be ensured that non car modes of travel are affordable.

Conclusion

- 3.17 Perhaps not unsurprisingly, all three groups focused their discussions around different themes relating to the vision. The developers group were keen that we take

on board CABE's comments that growth can be good with some pushing for high growth levels than those indicated. This was in comparison to the residents group who strongly disagreed with the growth levels set in the vision. The interest groups did not focus their discussions on growth levels but rather discussed environmental limits to growth which they felt was missing from the vision.

Spatial Strategy

Developers (Red/Yellow)

- 3.18 There was support for the general approach and layers within spatial strategy which the group felt were relevant. However, going beyond the three main constraints, topography, existing use and transport should be considered further. It was also stated that there needs to be more of a balance between the constraints. It was questioned how the existing use of a site affects the importance of the designation for the setting of the city. For example, if a site was a pig farm rather than open fields, would it be viewed the same. It was stated that it was unclear as to how designations have been founded.
- 3.19 It was questioned why there is an approach in the spatial strategy to prevent further coalescence given that as the city has grown, villages such as Acomb and Huntington coalesced. Some felt that it would be a natural progression for Haxby/Poppleton to become part of the urban core and Area C moves towards Dunnington therefore it was suggested that coalescence should be allowed to occur.
- 3.20 It was felt that the Core Strategy needs to accept that the city will have to expand, whilst protecting green wedges. There needs to be flexibility and the plan must endure for a long period of time, therefore there was the view that the Green Belt boundary needs to be pushed back further than the outer ring road and shouldn't be drawn tightly round the urban area. An example of Hull was given where there is no Green Belt but has protected important areas imposed through planning policy. Conversely, others felt that coalescence is not an issue for this plan period and had the view that the outer ring road should be the distinct boundary for this plan period.
- 3.21 There was support for the core strategy not setting percentages for each type of settlement as flexibility is preferable in case RSS figures should change etc.
- 3.22 With regard to villages it was felt that they should not be preserved in aspic or for development be limited to affordable housing since people want to live in villages, therefore need to make them more accessible with better transport links. It was commented that growth needs to be allowed to keep the villages going given that household size is reducing and the population is aging.
- 3.23 Discussion relating to employment land led to suggestions that we should emphasise that in reality 90% of employment growth will be within the ring road. It was also felt that Northminster Business Park seems peripheral as it is outside ring road.
- 3.24 It was also questioned why there are Park and Ride sites outside of the ring road.
- 3.25 In terms of the areas of search, Area G with the Haxby/Wigginton local service centre, plus rail halt was considered by one attendee to be a logical area for development. Others felt Area G along with Area H seemed remote, with Area C to the east of York a better location. Ecology in Area B would have to have overriding importance and development here should not preclude long distance views towards the Minster from the ring road. It was agreed that

further work should be to be carried out on suitability of all sites. It was felt that Area D seems overly constrained when compared to the other areas. particularly as the identified constraints could be overcome through design. It should also be considered in light of the proposed relocation of the Park and Ride and tram-train routes.

- 3.26 The issue was raised that concentrating development to the east of the city misses opportunities to enhance and benefit the west of city, which are areas known to be of higher deprivation. There was also discussion surrounding the issue of whether the availability of land will be enough to enable developers to meet the affordable housing and other requirements. It was stated that there would be more chance of creating a sustainable community by concentrating on Area A and B rather than distributing small numbers across many sites. However it was discussed that a pooled infrastructure approach is possible from smaller sites which would have less impact on existing communities.

Interest Groups (Green)

- 3.27 With regard to the settlement hierarchy it was questioned how much control the Council had in terms of where gets developed first. The identification of Poppleton as a Local Service Centre was questioned. It was felt that the impact of York North West, the new Park and Ride scheme and Northminster on the village means that there is no capacity for further development in this area.
- 3.28 Some of the group felt that we should focus on the positive aspects of the constraints identified and it was questioned whether the flood areas took account of the impact of flooding on areas not within flood zones.
- 3.29 Discussion surrounding the key diagram identified a preference for freight centres to be located around the edge of the city to reduce the number of HGVs travelling into the city centre. Furthermore, we shouldn't have business uses out of town near road networks, instead they should be located in town, near rail connections. It was agreed that further work should be carried out in relation to transport to develop an overall transport strategy for York. It was agreed that a master planning exercise should be undertaken for the potential urban extensions. These could be adopted as Area Action Plans.
- 3.30 The issue of an aging population and a subsequent increase in the number of disabled people in York was not considered to be adequately addressed. Given a general shift in demographic for York and that a recent study shows that retirees are choosing to relocate to historic cities we should look at balancing the housing needs of the population.
- 3.31 Other issues raised included the Council needing to have a stronger hold over the number and type of homes built in York and only planning for the growth of the existing population rather than including in migration. It was questioned who decides the balance in terms of development and environment and it was felt that a standard protocol looking at the upsides and downsides of development should be established. It was suggested that the Council should undertake an environmental capacity study. Consideration should also be given to a policy which sets out the minimum standards for sustainable homes to be included. This would address basic design issues such as the orientation of buildings in relation to the sun etc.

Residents (Blue)

- 3.32 There was general agreement with the approach taken to the spatial strategy however consideration should be given to the key entrances to the city and views which are important and should be a key element in identifying future areas of growth.
- 3.33 Some in the group felt strongly that areas within the urban core should be recognised and identified on the Key Diagram, particularly villages such as Fulford.
- 3.34 The group felt that further work was needed in refining the three constraints identified, particularly with regard to the Green Belt Character Areas. It was felt that protecting the Green Belt is paramount and there was discussion that perhaps the outer ring road shouldn't been seen as a boundary to development and development should be considered further away from the urban core. It was also considered that transport, and in particular infrastructure capacity should be a key consideration in formulating the spatial strategy.
- 3.35 Protecting the most important areas of Green Belt nearest to the urban core was important to the group and the ring road shouldn't be seen as a limit to development and consideration should be given to development isolated settlements to accommodate future growth.

Conclusion

- 3.36 Given the broad range of topics discussed, the differences between the groups surrounding the spatial strategy were less acute than the vision. However, the developer group did suggest that the boundary of the green belt should be drawn do tightly around the urban area which could constrain development, whereas the residents felt that green belt protection nearest the urban edge was paramount and that we should consider accommodating future growth in new isolated settlements away from the highest value green belt land. The interest group suggested that we should draw out the positives of the constraints in protecting important land such as the green belt.

4.0 AFTERNOON SESSION

- 4.1 The purpose of the afternoon session was to run three workshops focussing on key areas of the Core Strategy policies, namely design, green infrastructure and transport.
- 4.2 The design and historic environment workshop was aimed at stimulating discussions on whether design should be added to vision, moving onto obtaining views on what makes a place work well. Case studies and best practice were presented to stimulate the debate. Finally, the attendees were asked to comment on whether the proposed policy works and suggestions on how it could be improved.
- 4.3 In the green infrastructure workshop attendees were asked to comment on the functions and types of green infrastructure and to identify whether any additional studies were required to from part of the evidence base. Suggestions were then requested as to how best deliver our approach to Green Infrastructure.
- 4.4 With regard to the sustainable access and transport workshop discussions focussed on what elements make sustainable neighbourhoods, what services are most

important, what level they should be provided and what services are essential to create sustainable neighbourhoods. In terms of transport and access attendees were asked to comment on whether the key schemes identified in the Preferred Options document will contribute to reducing traffic congestion and reducing the need to travel by private car, whether some schemes should have priority or if there are additional schemes we should consider.

Feedback from Design and the Historic Environment Workshops

Developers (Red/Yellow)

- 4.5 With regard to adding design into the vision it was suggested that doing so would repeat national guidance, and that this was true of the policy itself. It was felt that adding too much repetition could cause an imbalance with other elements of the LDF and it was important that the Vision is succinct. The most important thing is to capture the vision for people to understand and don't expect them to read PPS1. It was considered that quality comes at the expense of something else and we need to be up-front about this. More linkages are needed between vision, evidence and options.
- 4.6 The policy should be York specific, such as the scale and presence of the Minster, taking out repetition and making policy shorter and more robust. It is important to distinguish between good architectural work and the mediocre. The pre-ambles to the policy must explain York's character; otherwise how does a designer understand what is required. In particular, historic landscape character needs to be added as the document as it stands is far too generalised. For example, what are the perceptions of York, are the viewpoints of visitors included
- 4.7 Discussion moved on to implementing the vision and policy and in particular the 'ordinary' parts of York. It was stated that achieving quality in conservation areas is easier, where there is 'power to your elbow' but it is important not to try to 're-invent the wheel' and differentiate between the character of each area, for example not trying to re-create medieval streets in Huntington. Being too prescriptive can suppress creativity and lead to more stereotyped development. It is important to be realistic e.g. in conservation areas, it is not always practical to re-create burgage plots. Policies need to be translated into something more site specific.
- 4.8 There was agreement that it is important to improve the quality of the public realm, but it was questioned what would happen if such areas are remote from the development site. Danger of 'political pegs' emerging, that can lead to refusals of permission.
- 4.9 With regard to the policy, it was felt that it is too detailed at this stage and we should leave more room for architecture, although it was agreed that the LDF should establish key principles, then bring out requirements for individual sites through planning briefs. Development Control principles should be established early on. Design codes can be too specific and heavy handed and become out-dated, e.g. Derwenthorpe. On the other hand, Terry's was quoted as a flexible design code, which brought quick wins. The use of design panels was discussed which brought concerns of a disproportionate influence over the design process. Should such panels work in all areas or just the most sensitive? An example was given of Bath where a panel of 'worthy' people was set up, but led to political problems of 'outsiders' telling the city what to do. Yet it was commented that the locally based York Design Awards have successfully picked out good fresh new buildings.

Interest Groups (Green)

- 4.10 York's special qualities should be defined in the vision and policy as these are considered to be the pre-cursor to good design. Not everything can be up-front, but an 'umbrella' is needed that design guides for sites can develop from. It was felt that reference should be made to the documents that are needed e.g. Conservation Area Appraisals, as a marker. The high level policy should 'meet' developers head on; they do not always pick up the policies. It was agreed that achieving quality is not just in the architecture, but the place.
- 4.11 In discussing what makes a place work well it was identified that the local context must be understood and what this means in terms of sustainable local materials. Positive factors from local examples must be emphasised, not negative factors and the conservation area national policy wording should be preserved and enhanced, not or. It was felt by the group that the word unique is used too much.
- 4.12 With regard to implementing the policy it was suggested that development needs an 'ethos' that binds it together and creates a sense of community, this must avoid pastiche. A study into the key views was suggested as we need to consider how far out from the city centre to take this. York is a city plus its villages, where there are also conservation areas, conservation area appraisals will identify their character.
- 4.13 It was felt that the public realm and *open spaces* can be interlinked. The LDF should refer to both. The concept of spatial goes out from the doorstep into the public realm and the facilities to be found there. The importance of green setting for buildings was brought up as people can be inhibited from using spaces and gardens if the design is boring. The group felt that we should consider having a design champion to avoid standard designs by understanding the uniqueness of the historic city and other areas. However, even though some suburbs lack particular design quality, they are still home to people. Some sites may be architecturally more important than others, but not if you live there. Equally higher design standards are needed in priority areas, for example, the Bishophill Study by the late George Pace exemplified how to understand character.
- 4.14 One attendee discussed that the York Open Planning Forum has prepared a local list of buildings and artefacts, which should be adopted as policy, to complement the statutory list of buildings. Discussion followed this which included the need for character studies of key sites.
- 4.15 It was important to the group to recognise that perceptions change over time and that we shouldn't preclude anything, taking the best examples from within or outside York and follow CABI's design principles. It was noted that money is the deciding factor when it comes to whether a development achieves good design.
- 4.16 Discussion of the approach to design brought suggestions that each site needs its own guidelines as part of the planning brief. Both traditional and contemporary design has a role e.g. York NorthWest could be cotemporary where as Aldwark is a good example of traditional design. In Village Design Statement people identify the special character of their place, and these have to be taken into account in development control decisions. It was questioned whether Village Design Statement have been taken into account in the LDF and if the Council will have criteria for sites and design solutions.

-
- 4.17 In considering the treatment of spaces the group felt that York's footstreets are pedestrian friendly, but not at servicing times and we should consider provision for special needs e.g. wheelchairs and the York Access Group say there are problems for people with guide dogs in shared surfaces/ spaces without kerbs etc e.g. in training the dogs. It was suggested that we should consider homezones, such as those in the Nestle proposals. The group felt that developers should be asked to provide facilities e.g. shops/community facilities in all schemes over a certain size and that this must be part of the design. It was also discussed that there is a problem of local food shops changing to other uses which can result in loss of character.

Residents(Blue)

- 4.18 Although we want to preserve our medieval past it questioned what our legacy will be and what will make York distinct and we need to define what is specific to York such as variety, yet also consistency, variations in rooflines, the subtleties and intangibles such as looking at what's above our heads not just at the ground floor. It was suggested that the Esher Report should be updated. Shouldn't look at best practice elsewhere but should concentrate on York and make sure we get the right skills to implement good design. Whilst it is important to create streets and communities it is not enough to have a good space, need good buildings also. As such, this group felt that buildings and spaces are equally important, as well as materials. We should avoid fake add-ons to buildings and consider having more than one developer on larger sites, to achieve variety. Acomb was cited as an example of a village street, whose character is now being threatened by the design of new developments.
- 4.19 It was thought that the policy is idealistic, but recent developments don't live up to this. Should make the words in the policy count. The group felt that there have been too many missed opportunities and questioned how this can still be happening and how do we make development fit with policy. Maintenance costs should be considered and 'book balancing' is not the long term solution.

Conclusion

- 4.20 The developer group discussed at some length the high level policy wording; being by and large concerned that, whilst policies should capture the specific qualities of York, they should not be too prescriptive in the development process nor repeat national guidance. The Interest group also discussed the generic verses specific wording to be included in the LDF, but as might be expected with less emphasis on the constraints this might have in the development process. Rather they emphasised the need for the 'umbrella' policies, as they termed it, of the LDF vision; to achieve quality of architecture and place. Both groups, though with a different emphasis, were saying how do we capture the accepted (yet elusive) qualities of York, in wording that balances the specifics of York with national policies.
- 4.21 The residents group went 'behind' the generic verses specific policy discussions of the other groups, to bring out their concerns of how to actually make the policies count this time to create places and communities that continue to make York distinct.

Feedback from Green Infrastructure Workshops

Developers (Red/Yellow)

- 4.22 Its was felt by this group that 'Green Infrastructure' implies engineering and is a difficult term. As with the Green Belt, the positive qualities of the green environment

need to be brought out and the benefits of accessible space for people promoted. The gains of land release to be defined as an opportunity to grow the city in a sensible way. There was support for extending the strays, parks and green wedges however it should be noted that historic strays are only one part of the historic landscape.

- 4.23 The group questioned whether green spaces need to be linked together to be a network and that doing this would need an evidence base to justify it. The issue was also raised of how to manage those sites that don't have public access, e.g. gardens and whether there will be a development control element to the corridors.
- 4.24 In terms of deliverability the question was asked who will finance green infrastructure and that if developers were expected to fund it on top of affordable housing and meeting sustainability principles then sufficient land would be needed to make things happen. Given the shortage of housing land towards the end of the plan period, and the emphasis on brown field before green field it was suggested that this will narrow down delivery. It was agreed that success will be in the implementation and that it will be important to give access to and linkages between green infrastructure.
- 4.25 With regard to the Natural England map and the red areas in the rural hinterland it was felt that we therefore need to boost the value of the Green Belt/public access rather than actual designations. It was suggested that ecology assessments must stretch beyond City of York boundaries and consider regional and local Biodiversity Action Plans. We should also look at agricultural land quality and what use it can be put to as most land is not capable of being used to that quality.
- 4.26 It was questioned where the detailed policy on green infrastructure will be and that if it is to be an SPD this needs to be referenced. Whilst it was acknowledged that the policies set the approach to managing/improving access to the city comments were made as to whether it could be more descriptive for development control purposes.
- 4.27 Discussion evolved surrounding good design and maintaining green corridors, and which was paramount. It was agreed that both can be achieved and the examples of Germany Beck and Derwenthorpe were identified. However there needs to be a distinction between planning and policy, for example Germany Beck had opportunity for two fields to become green infrastructure. There is a need for a wider picture. Given that green infrastructure covers a large part of the city the wording of the policy is crucial rather than the lines on the map. It was suggested that there could be an alternative policy approach focussing on how you can contribute/create green infrastructure.
- 4.28 The group felt that the vision should be reworded because it currently infers that green infrastructure is sacrosanct. Must be clear that this is a public private vehicle to make things happen, rather than others using it as a constraint to stop things happening.
- 4.29 Overall, the group supported the aspirations of the current policy but queried the evidence base to date.

Interest Groups (Green)

- 4.30 It was felt by this group that green infrastructure covers public and private provision, including private woodlands and gardens. Green road corridors contribute to the nature and the setting of York and that visual amenity is often forgotten for example

views from the A64, A59 and ring road. It was felt that preserving ancient monuments as green infrastructure also preserves archaeology which has double value. Furthermore, allotments were considered to bring environmental and social community benefits. The health aspects of trees which absorb pollution and act as acoustic barrier for noise from main roads should also be noted as a function of green infrastructure. It was suggested that some of the green corridors are part of York's historic environment, not just the built environment.

- 4.31 In terms of the evidence the group considered that Fulford Community Orchard, Germany Beck corridor which links SINC site, Heslington Tilmire, the Ings by the A19, verges along Clifton, Bootham and Shipton Road, the Sustrans cycle path north from Morrisons and the proposed cycle path from Strensall to Haxby should all be added to the map.
- 4.32 With regard to priorities for the green infrastructure network the group considered that the city was deficient in outdoor sports facilities and cricket pitches. Also need to enhance sites through extra planting and increasing the number of reseeded areas (for example Rawcliffe Ings), restore areas lost to intensive agriculture and preserve ancient grassland. It was also suggested that the locks on the Foss Navigation and New Earswick could be renovated or enhanced.
- 4.33 Strengthening policy to prevent people terracing over their front gardens, or sub dividing rear gardens was raised as a key issue and developers should not be allowed to neglect and leave sites to deteriorate. Funding for maintenance and management of the sites is needed.
- 4.34 Concern was raised about proposals for bus lanes along the A19, Fulford Road and Tadcaster Road which would be detrimental to green corridors. It questioned whether traffic and highways infrastructure outweighs green infrastructure needs.
- 4.35 Hull Road bus priority routes was highlighted as development that works without encroaching on green space, with the added benefit of more bus journeys and less car journeys resulting in less pollution. Another example given was the tarmac path across Hob Moor which was built over a ridge and furrow system, yet preserves the rest of the Moor from informal paths. It was also thought that the Germany Beck scheme will bring forward a better quality of open space. It was also noted that project 'Wildflowering York' is underway along arterial road verges into town which contributes positively to the green infrastructure network.

Residents (Blue)

- 4.36 In terms of the functions of green infrastructure it was suggested that Askham Bog provides an educational function and that the Sustrans paths improve accessibility. It was noted by the group that lots of open spaces are flood plains so cannot be used for anything else. We should consider looking at green linkages between sites, including industrial sites and recognise that older people are less mobile and want quiet space to sit and rest and enjoy visual amenity. The ring road was identified as an area of high biodiversity and it was suggested that we should plant with wildflower seeds like in Lincoln. The city needs accessible natural and semi natural space. The group questioned whether the sites identified as forming part of the green infrastructure network will be protected by planning policy.
- 4.37 The group felt that an important priority is the need to promote availability to York's open spaces as some attendees were not aware of many of the open spaces

identified and whether they are publicly accessible. It was suggested that the inventory be publicised. Reference should be included about the needs of disabled people, including partially sighted and hard of hearing as it was noted that the Millennium Bridge cannot be accessed by mobility scooters due to the steps. There is also a need to look at public transport access in both town and villages to green infrastructure. It was suggested that Park and Ride sites should be landscaped to become country parks. The group discussed that large open areas and paths can sometimes feel unsafe and be intimidating and therefore need to design safety into plans.

- 4.38 With regard to deliverability of the policy it was discussed that Friends of New Walk mowing work is contracted out by the Council and mowing regimes are not adhered to (e.g. wildflower areas have been mowed). As such, we need a management or action plan for implementation to ensure deliverability and ongoing funding for maintenance of areas is very important. It was questioned whether the private sector could sponsor maintenance of some areas. Voluntary action and community ethos was also considered to be important to successful delivery.

Conclusion

- 4.39 The developer group were naturally concerned about deliverability of green infrastructure policy particularly in its application and funding. This was an issue the resident group picked up on, albeit with regard to funding for continued maintenance. The interest group really got into the detail of what makes up green infrastructure drawing out the varied functions that should be considered.

Feedback from Sustainable Access and Transport Workshops

Developers (Red /Yellow)

- 4.40 The group discussed that the size of the community is important when deciding the level of services required to make a sustainable neighbourhood. It is also important to look at school catchment areas and health provision. It was questioned whether York already has a sufficient level of large convenience stores and suggested that existing stores are not well distributed through the City.
- 4.41 It was felt that the Council should look at Indices of Deprivation to assess gaps in access to services, in conjunction with local consultation. Neighbourhood Action Plans were considered an important tool to address these gaps.
- 4.42 With regard to transport and access the group felt it was important to have an understanding of the timescales and feasibility of major transport schemes. It was questioned why there was a need for a new Park and Ride on A59 given there are no settlements directly to the west of the city.
- 4.43 Understanding how people travel by bus was discussed, for example all buses go to the centre therefore it is difficult to travel from west of city to the north and this discourages bus use. Bus services need to be viable to get people out of their cars.
- 4.44 Given that bus routes may change in the future and this is outside the control of the Council the validity of making decisions on the spatial strategy based on existing bus routes was questioned. It was suggested that we need to be more pro-active with transport schemes, one example suggested was dualling the outer ring road. If we

don't then we will be repeating the short-sighted planning of the past when the ring road was originally built.

- 4.45 The group identified that areas of growth on the key diagram are concentrated in the north where congestion on the ring road seems to be worst. It was argued that there is no less potential in the south of the city.

Interest Groups (Green)

- 4.46 In discussing what makes a sustainable neighbourhood this group identified that green space is very important and specifically allotments, natural/semi natural green space and access to the countryside. It was felt that communities need a focal point and that community meeting places are crucial, such as a church, community hall/centre or just a bench on the street. Ownership of a community was thought to be key to sustainable neighbourhoods and this creates a sense of pride in an area. Poppleton was seen by the group as a good example of a sustainable neighbourhood. It was suggested that although some communities did not work at present they could be transformed.
- 4.47 In terms of access to services, being able to walk to key services was seen as important with play areas for children indicated as being essential, as well as facilities for young people. It was felt that encouraging choice in schools was reducing schools role as the centre of communities. The group felt that there is a need to tackle the competition of supermarkets because of the impact they are having on local shops.
- 4.48 It was highlighted that students should be fully integrated into a community as they are a new population which needs to be accounted for. Researching these new communities is a way of understanding what works and what doesn't.
- 4.49 In terms of key city wide and local services the community stadium could be seen as a disadvantage due to the increased congestion it will create if located in the city centre/York Northwest. It should be on the periphery of the city. At the local level, sports facilities indoor and outdoor, local shops, post offices and general stores were seen as important services.
- 4.50 In respect of access and transport, changing to pedestrian priority at traffic lights was seen as important to make people more likely to walk rather than getting in their car. It was felt that as a cycling city we should put in place a rented bike scheme. However we need to avoid pedestrian/cyclist conflict by addressing the problems of shared space. Buses were thought to contribute to pollution and congestion and therefore bus size and efficiency should be considered. Air pollution should be a key element of the Core Strategy. The need to balance Park and Ride schemes against city centre parking was discussed and that pricing should encourage use of Park and Ride. In terms of new rail links need to be quick and efficient to encourage people to use them.
- 4.51 It was felt we need to be more visionary in our approach to solving transport issues. An increased use of the river network in the city was suggested, in particular making use of riverside walkways and cycleways.

Residents (Blue)

- 4.52 Employment was seen as a key element to a sustainable neighbourhood, especially training facilities for the young. People getting involved in the neighbourhood was

seen as crucial including volunteering and mentoring with younger age groups. The local pub is also an important element of any community. Local shops are seen as a key element but it was suggested that there should be somewhere to park cars nearby such as the Bishopthorpe Road car park and that high business rates affect specialist local shops. The Bishopthorpe Road area was suggested as being a sustainable neighbourhood.

- 4.53 Safety in the community was important and the role of the car in this, including speed limits which should be looked into, such as 20mph in built up areas.
- 4.54 A showground facility (such as the Yorkshire Show Ground) would be sensible adjacent to the Community Stadium. New conference and concert facilities following the closure of the Barbican were also identified as key services.
- 4.55 Discussions regarding transport focussed on the problems over the cost and reliability of buses and the influence the Council has over private bus firms. Cross-ticketing agreements with all bus companies is needed. It was felt there should be better enforcement to stop deliveries at peak times on the Stonebow which interfere with the buses. Park and Rides schemes should be promoted but they need to be expanded because they are getting full. Better signing is also required, it was raised whether we could explore variable message signs to indicate which sites are full and therefore suggest alternative Park and Rides to use. It was also suggested that parking charges are used as an incentive to use Park and Ride schemes. In terms of 'Dial and Ride' scheme to provide a service to the larger community.
- 4.56 It was felt that we need to accept that there will never be enough road space or parking available to meet the demands of every individual driver. Therefore our approach should not be seen as anti-car but instead about increasing road capacity for those who need to use the roads such as emergency vehicles, buses and disabled drivers. We also need to consider vulnerable road users when thinking about shared road space, for example the impact of cyclists on pedestrians as well as the needs of the blind and partially sighted. Addressing transport issues needs to be part of an integrated approach, covering all transport types and we need to ensure that we can deliver the transport infrastructure to support growth.
- 4.57 Although some felt that tram-train development was unlikely, there was some support for it, although concerns were expressed about the capacity at the main station. It was suggested that we should test the viability of rail options against dedicated bus routes. The idea of a freight consolidation centre would mean higher costs to the consumer. If we are proposing new rail links and a large number of people commute to Leeds it was questioned whether we could explore creating new communities by Copmanthorpe to make use of existing rail lines.
- 4.58 It was suggested that the Council should encourage businesses to provide secure cycle parking, as well as encouraging schemes such as car sharing and short term car hire, for example 'Whizz-Go' schemes.

Conclusions

- 4.59 There was differences between the groups with regard to what they considered was important in creating sustainable neighbourhoods with the developer group concentrating discussions on the size of the community, school catchment areas and health provision, whereas the interest groups focussed on green space and access

to the countryside. The residents thought that employment and training was important to sustainable neighbourhoods as well as community involvement.

- 4.60 In terms of transport, the developer group suggested that the council needs to be more proactive with transport schemes which the residents mirrored by suggesting that a visionary approach was important.

**Local Development Framework
Affordable Housing Core Strategy Workshop
Merchant Taylor's Hall
21st Sept 2009**

This workshop was one of a series of events run as part of the Core Strategy Preferred Options Consultation.

The aim of this note is to broadly capture the diverse range of views and opinions of those who attended the event. Key bullet points are listed under the three questions that were explored at the event. This note does not seek to discuss or counter any of the views put forward, its aim is to illustrate the range of comments received on the day.

A comprehensive review of comments received to the Preferred Options consultation will follow to assist in the formulation of the Core Strategy Submission Document.

List of Attendees

Janet O'Neill	O'Neill Associates
Ruth Beckwith	Land and Development Practice
Paul Landais Stamp	CYC Housing Strategy Manager
Mr M Laverack	Laverack Associates
Marie Lodge	Fabrick
Helen Martland	Chevin Housing Group
Jenny Jacobs	Harrogate DC
Sarah Mustill	Pegasus
Eamonn Keogh	Turley Associates
Katherine Richmond	CYC Housing Development Co-ordinator
Mr J Reeves	The Helmsley Group
John Gilham	York Housing Ass
Paul Atkins	Yorkshire Housing
Alyson Linnegar	Selby District Council
Andrew Smith	Savills
Paul McCabe	CYC Policy and Planning Manager Housing
Mr G Scott	Hogg the Builder
Tim Reeves	Advent Developments
Ian Clyde	Home Housing
Jonathan Gibson	JRHT
Tracey Rathmell	Harrogate DC
R A Flanagan	Lawerence Hannah
Andy Kerr	CYC Housing Development Manager
Ian Hessay	Caddick Living
John Hocking	Joseph Rowntree Foundation
Anne Rowlands	Railway Housing
Bob Towner	Essentially Housing
Luke McDonald	Homes and Communities Agency
Philip Callow	CYC Head of Asset and Property Management
Paul Cordock	Claxton Construction
Peter Hill	Hogg the Builders
Hannah Long	Chevin
Sharon Graham	Arc4 Ltd
Colin Stroud	York Council for Voluntary Service
Hilary Bardon	East Riding of Yorkshire Council
David Johnson	O'Neill Associates
Mark Johnson	Dacre Homes

Question 1 – Do you agree that we should be trying to achieve 43% of all housing being built as affordable as recommended in the Strategic Housing Market Assessment (SHMA) 2007. If not, do you have alternative evidence to support any proposed revised targets?

- CYC has no other choice than to use the 43% figure as it has come from the evidence base
- SHMA is out of date due to the recession
- 43% was not achievable in better market conditions
- targets should focus on number of houses as opposed to percentages
- in the short term it is important to consider the latest delivery rates – if we're not building enough houses overall the need for affordable housing is going to increase.
- the target should be accepted as being an aspirational goal, however, this should be tempered by viability issues
- too early to say if 43% can be achieved as the evidence from the viability assessment is needed
- there should be no affordable housing target in the current market
- targets are required in the current market in order to get affordable housing built
- delivery will always be less than the target, so targets should be ambitious enough as negotiations between developers and the Council is inevitable
- rather than lower targets, flexibility within the policy is required to address changing economic conditions
- the LDF needs to be flexible and policies should not look further than 2-3years, 20 years is too long.
- setting targets for individual sites is an option worth considering
- debate on affordable housing needs to sit within a wider consideration of all developer contributions. Affordable housing often suffers, as other S106 contributions are pre determined. Affordable housing could be prioritised by areas and other financial contributions such as for education and open space could be wavered in these areas.
- Central Govt; Local Planning Authorities and politicians put too much emphasis on brownfield sites coming forward first. Greenfield sites would help to stimulate the market and deliver affordable units.
- land owners need to reduce their expectations for sale value
- the availability of mortgages is an issue for concern.
- approved sites can not be developed in line with original planning decisions and, unless land deals can be re- negotiated, revisions to affordable housing numbers or mix may need to be sought.

Question 2 – Which of the 3 Local Development Framework proposed options approaches do you consider we should use to meet affordable housing need in York and why? Or are there other overall targets or methods we could employ to achieve the level of affordable housing required?

General comments

- three key elements that any approach must consider: overall percent target; on/off site provision; thresholds for sliding scale
- flexibility in negotiation versus certainty in policy. You can't really have both, or can you ?
- a sliding scale target should link to the density policy in the Core Strategy
- viability model should be a partner approach between authority, Members, developers and landowners – need for clarity and understanding for all parties
- involving landowners will give them a better understanding and hopefully more realistic expectations
- policy could stipulate a minimum target that increases through negotiations
- too much focus on numbers and not enough on the nature of houses
- viability is a key factor, all options are theoretical as they are dependant on viability
- smaller housing developments will not come forward and are not viable unless higher thresholds are introduced.
- policy should be reviewed on a regular basis.
- what is the key priority for York ? – social housing or a thriving economy ?
- links to other S106 contributions required
- tenures / shared ownership should be thought about
- student housing should be considered
- financial contributions would help delivery
- exception sites are key in rural areas
- set lower target to achieve higher numbers of delivery
- land will not come forward in the short term if no financial gain can be achieved
- flexibility to negotiate on individual sites is important when considering viability issues
- vacant stock of housing unsold/not yet built by builders could be sold to RSLs who would be free to provide an effective split of tenure, hence, providing more affordable housing.
- funding from Central Government is needed for effective provision of affordable housing nationally and locally
- Delivery of affordable housing in rural areas isn't viable - could CYC restrict type of housing and raise the threshold to encourage starter homes to be built.

Option 1 – Existing Policy Approach

- current approach isn't flexible for the current market
- not working as levels are too high
- lack of understanding in respect that 50% is a target
- the rural areas threshold needs to be increased otherwise developers will just build 1 omv house
- giving a target of 50% gives clarity, it has worked and it is robust / clear
- 15 dwellings + in the urban area helps smaller builders.
- this approach is too crude / blunt.
- this method is unfair, as only the larger developers will be providing affordable housing in urban areas.

Options 2 and 3 – Sliding Scales

- there is merit in a sliding scale but the thresholds need to be right

- there should be a free affordable housing zone up to 10 houses
- if a threshold is set, always going to get development just below, so there should be no threshold
- densities are important and need to be considered in conjunction with the sliding scale policy
- number of sites that have come forward with 50% affordable suggests option 2 isn't viable.
- rural area should have a higher threshold ,4 houses and above was suggested .
- off site provision was seen as more acceptable on smaller sites
- option 3 has no site area so affordable housing delivered on all schemes – but problem potentially for no affordable housing in villages

Better methods of providing affordable housing, which hadn't been identified:

- on certain sites developers could join together and be more pragmatic especially on smaller sites and build affordable housing off site.
- it should come down to 'outcomes not the process'.
- off site provision should be considered for flexibility
- first time buyers usually want to buy existing houses not new homes. So contributions should be sought and used to buy existing houses and make them affordable
- need to think more holistically – need to think about the whole LDF Spatial Strategy and not just affordable housing in isolation.

Question 3 - Commercial developments employ a wide range of employees and a proportion of these will be on a low income and will not be able to afford to buy a property. Unplanned commercial developments may therefore put a strain on existing housing stock. Other cities successfully operate a policy to secure financial contributions from new commercial development that generate significant need for affordable housing. Do you consider that this is an avenue that York should explore?

- no support
- commercial values fallen further than residential values
- additional cost will stifle speculative developments
- needs nearby authorities to do the same so not to discourage developers in York and to prevent them building in neighbouring authorities
- could discourage the job market in York
- the incomers to these jobs maybe skilled and not on low incomes, and the circumstances of the employees could not be determined when the application is submitted.
- it was suggested that this could be looked at as part of the viability assessment
- examples of how this works in other towns/cities would be required to give an informed comment
- in theory this could work in York as we have a growing economy and the benefits from this could be used to offset the requirements provided from housing sites
- CYC needs to look down all avenues to achieve housing targets, this may be a possibility.
- viability is of paramount importance

**York – Planning an Attractive Place for Business
York Professionals and York Business Forum Workshop
Merchant Taylor’s Hall
Monday 28th September 2009
Feedback**

1.0 INTRODUCTION

- 1.1 The workshop held on Monday 28th September 2009 at the Merchant Taylor’s Hall in York was one of a series of events that have taken place over the past few months as part of the Core Strategy Preferred Options consultation, which will inform the submission draft stage in the production of this key document in York’s Local Development Framework. The aim of the following note is to broadly capture the diverse range of views and opinions of those who attended the event. It should be noted that the views expressed in this note are of those who attended the workshop and not necessarily the views of City of York Council.

2.0 PROGRAMME

- 2.1 The workshop was pitched as informal but structured, comprising an introduction by Peter Kay, Chair of the York Economic Partnership followed by a presentation from David Caulfield, Head of City Development on the role of the Core Strategy before group discussions. Principal Planning Officer Martin Grainger then gave a presentation on the Strategic Policies of the Core Strategy followed by further group discussions.
- 2.2 Feedback from the event’s three discussion topics is provided below.

3.0 DISCUSSION ONE: KEY ISSUES AND CHALLENGES

- 3.1 Attendees were asked to comment on the key issues and challenges identified in the Core Strategy. Alongside this, views were sought on what makes York good for business and what barriers exist to doing business in York.

Feedback

- 3.2 With regard to the key issues and challenges identified in the Preferred Options Core Strategy it was felt by some that the issue of development in outer villages to enable thriving sustainable communities should be added to ensure this is picked up in policy.
- 3.3 It was suggested that there is a perception that ‘York doesn’t want change’ and that a cultural attitude change needs to take place. It was stated that we need a vision promoting architectural and urban design excellence and excellent public spaces which can assist the economic image of the city. Some felt that there is more scope to be visionary with new buildings like in Cambridge, Seville and Bilbao.
- 3.4 Some attendees considered that there should be reference to reducing global warming and the carbon footprint of developments as a key issue.
- 3.5 It was also felt that different types of businesses should be attracted to the city, not just knowledge based industries. There is a need for a variety of manufacturing and knowledge-based economy job opportunities to cover all eventualities, ‘all our eggs should not be in one basket to be able to maintain our economy in the future’.

- 3.6 Other issues, challenges and opportunities that were felt to be missing from those identified in the Preferred Options Core Strategy include:

Tourism

- Tourism should be seen as an opportunity.
- The city is deficient in cultural diversity and has a poor evening economy. There needs to be more cultural opportunities aimed specifically at the local communities as European cities do (such as the Mystery Plays). This would improve York's cultural offer and may benefit tourism.
- Conferencing is one element of the economy that appears unaffected by the recession and York is missing out. The opportunity of a new high quality conference venue could also serve as an element of improvement to the evening economy if properly designed to accommodate a range of activities/audiences.
- A need for more high quality hotels close to/in the city centre.

Employment Type

- Loss of traditional industries which leaves whole communities with gaps in opportunities and education as to the new skills needed.
- Lack of confidence in new economies as they are less visual/tangible to the current population.
- It is important that the LDF encourages a business environment which stimulates investment i.e. creates opportunities for entrepreneurs.

Public Realm

- A high quality public realm is very important to the broad business community, and the Core Strategy should aim to enhance it.

- 3.7 The groups felt that the following make York good for business:

- The environment of York is attractive and people want to come to the city, we should celebrate what it has and enhance it further.
- The knowledge economy is excellent both inside and outside the city centre but it could be drawn upon and expanded further than it is currently. Science businesses in York have been very successful.
- York has an excellent selection of pubs and restaurants and bars in the city centre.
- Many skills are currently retained in York with the rail industry, this could be maintained and enhanced with improved links in relation to more knowledge-based industry.
- Retail is a major pull for people to York. The city is celebrated for its diversity and independent shops and this needs to be maintained.
- The city's compactness can act as a positive because it adds an attractive environment for certain businesses (more traditional businesses).

- 3.8 Some attendees considered that better promotion of the benefits of the city would help to attract successful business to the city creating the correct jobs and businesses. Barriers to businesses identified at the workshop include:

Transport

- Congestion, especially of the ring roads. Some felt that the outer ring road should be dualled and others suggested that a congestion charge could be introduced one day a week.
- Poor, fragmented traffic system, Park & Ride buses finish early and do not facilitate people staying later in the city centre.
- Constrained access, in particular in crossing the city.
- Airport access/shuttle bus currently non-existent. Stronger links to air travel are needed.
- Car parking within the city centre is too costly and stifles business.

Tourism

- Despite the good pubs and bars in York the tendency is for people to go out of town to Leeds etc. in the evening, seeing York as a place of work only. More events/enhanced evening economy would encourage people to stay and spend in the city.

Employment Land and Type

- There are no large areas specifically for businesses, this can inhibit attracting new major employers.
- Whilst science businesses have done well in York, other businesses have not been so successful and work is needed for other graduates through improved business links.
- A lack of space within the city centre for large development stores to develop e.g. John Lewis. Some adequate sites close to or within the city centre need to be prioritised so that York's retail base is not diluted (e.g. Castle Piccadilly).

- 3.9 There was general agreement across the groups that transport is the greatest challenge for business in York, although some attendees did suggest that perhaps York's congestion isn't as bad as some other cities. One group suggested that a clear vision of future transport requirements needs to be set out and there is scope to be more radical. It was also highlighted that cycling needs to be promoted strongly. It was suggested that areas should be taken away from car parking to provide for cycle storage, which should be more secure than just racks on the street. Examples were given of schemes within Europe of under ground parking facilities for cycle storage that brings the bike up when requested and saves space. Pay and go cycling was also suggested which has been very successful elsewhere. To encourage cycling there is a need for a much more integrated cycle network incorporated into every road not just selected routes.

4.0 DISCUSSION TWO: POLICY APPROACH

- 4.1 The purpose of Discussion Two was to establish whether attendees thought that the Preferred Options policy approach will address the key issues and challenges that York faces now and in the future.

Feedback

- 4.2 It was suggested that the current economic climate should be factored into timescales in delivery of the policy, especially as we come out of 'recession'. It was also suggested that it is vital that the Council opens up dialogue upfront with large employers (e.g. CPP) to ascertain their projected future land requirements and build this into the process, allowing adequate land for their projected expansion and land requirements within the plan period. Failing to do this would see businesses constrained due to lack of expansion land adjacent to their current sites. Top down economic projections in isolation are not enough.
- 4.3 The following were considered to be missing from the policy approach:

Types of employment

- It was reiterated that York has a lot of skills and industries have the potential to attract large numbers of employees, the policy should be more ambitious to reflect this.

Retail

- Need to get the balance right e.g. some of the most attractive streets do not have large multinationals and York needs to build on a quality offer and juxtaposition of good wine bars with retailers.
- Research where people want to go and build on that. There is still a lot of unused space in the city centre.
- Need to balance development so that it is integrated e.g. out of centre retail did not have good public transport links to the city and it inhibits people using it all the time.
- Footstreets were controversial initially but now retailers want them to be expanded
- Could introduce parking charges for out of centre shopping as an incentive to shop in the city centre
- Should ban future growth of supermarkets
- Should support the special offer of York shops of local, independent retail

Tourism

- York city centre is looking worn and tired in places. It does need investment but York should not make the same mistake that others have made, e.g. Leeds Armouries has benefited from lots of regeneration and is a good place to be during the day but it is a ghost town at night.
- The footstreets were generally welcomed but it was felt the different times confused tourists and the current arrangements were too disjointed.
- Instances of people being put off coming staying in York because they had to stay two nights. Many people only need one night's stay and some felt this policy was dictatorial and was inhibiting businesses.
- Reference to the natural environment and river should be added to the policy, as it can enhance the attractiveness of the City for certain businesses (for example, the river could be used for transport, which can boost tourism and encourage tourism based business)

- Perhaps the historic city centre should be preserved as a tourist and cultural destination with all other 'day to day' services and functions moved out of the city centre to the suburbs and villages.
- The city's historical context, heritage and culture should be added to the policy as they can provide a stimulus for business development
- Should expand the evening offer for tourist and residents alike

Transport

- The current approach to transport is not forward thinking enough. Easy access is vital for businesses.
- There were mixed views regarding HGVs in the city with some feeling it is part of the life of the city and traffic makes it cosmopolitan, citing Amsterdam as another city that copes with traffic and still functions. Others said that many felt they were in danger of being mown down by HGVs at certain times of the day and it put off families and others coming in at those times.
- Should develop international transport links e.g. road to Hull/Robin Hood Airport.
- Most commuters are from the east and south. York Northwest is the north of the city and it was questioned how employees will get to the site, a Park & Ride into the city centre and then another bus in the site? This was identified as a barrier. Accessibility needs to be properly thought out and a more joined up approach taken.
- Small to medium enterprises especially need good accessibility as they do not have the resources that larger firms do.
- A freight depot would cost too much, smaller firms would prefer to transport their own goods directly.

Workforce

- More could be done to strengthen and build on networks between graduates so that future students form relationships and friendships and business links
- Need to introduce policy that will ensure that students are retained
- More should be done to consider widening employment choices of non-graduates.

Employment Land

- It is vital to have a plan to attract funding investment into the city but if the plan does not work it will be worse than having no plan.
- It was felt that the absence of a plan has inhibited development in York.
- A lot was made of York Northwest and York Central sites but some attendees felt it was in the wrong place as the site suffered access problems which need serious rethinking.
- Should identify sites for R&D beyond the start-up units within the University

5.0 DISCUSSION THREE: LAND FOR BUSINESS

- 5.1 Discussion Three focussed on the broad principles that sit behind the approach to land for business within the Core Strategy and the key sites and areas identified for employment.

Feedback

5.2 With regard to the location of future employment sites and potential issues with the current policy approach the following comments were made:

- The view to develop York in this way for 20 years is too constrained. Perhaps a better method would be to offer more sites and choices for phased development and to set time lines to reduce dramatic sprawl in short timeframes.
- Whilst it was acknowledged that accessibility is one of many factors it is a critical consideration for businesses.
- York should promote the fact that it is a great place to live and use the history of social consciences of employers such as Rowntree to market the city better.
- The river is a lost opportunity and could be used as a transport link, it goes from south to the north west which is the route most needed. Park and sail could be used and could be integrated with the rest of the transport system.
- It was suggested by some that the growth proposed is too high and unsustainable
- It was felt the key diagram map does not address the connections with the rest of the region especially to the east and the south. York is more than its connections with Leeds and should not be viewed as a microcosm.
- Areas such as Elvington Airfield and Business Park offer suitable locations for development and could be linked to the Outer Ring Road via an additional access road.
- Is York so 'special' in terms of its character, history and heritage that much more bold solutions should be proposed to bring sites forward
- Some sites which are 'attractive' to employers may differ from what makes the city 'attractive' to tourists and residents.
- The LDF needs to identify sites for 'clustering' e.g. in relation to R&D, at or close to the University.
- Phasing of sites for business is critical in delivering a planned approach to development in the city.
- Some questioned whether distribution centres were appropriate in York. Distribution centres (including internet sales based businesses) should be located away from the urban area, preferably along transport corridors with good access to motorways.
- It was noted that there are some uncomfortable decisions to be made and it was questioned whether Members were willing to address them. Some felt development was needed in the south but NIMBYs always seemed to have the last word.
- A thorough and well considered approach but should we be planning for so much growth? Transport/congestion a real problem that needs to be solved before looking at anymore growth. Example of Athens given where people can only use their cars on alternate days, haven't quite reached this in York but it might come to this.
- Developments should be flexible in terms of use (retail/office/manufacturing) together with mixed tenure options to maximise attractiveness of a site
- Should be planning for small scale employment for local needs through reinvestment in declining areas.

- To encourage more sustainable transport methods to employment sites have to offer a good alternative to the private car to get people out of their cars. Some businesses will not even consider a site without key transport access.

5.3 The following points were raised relating to specific sites:

- Castle Piccadilly is an eyesore and something needs to be done soon to bring back retail into the city centre. Any development must have complementary aims and must fit with the surrounding area.
- Hungate development will help to attract investment back into the area and should increase property values.
- Nestle South is potentially limited as it has access issues and the area is heavily congested.
- Alternative transport access to York Northwest has to be considered, tram train route along railway line would be a sustainable option.
- Terrys has good links and mixed development and just needs planning consent.
- Layerthorpe needs to be totally regenerated.
- The only realistic area to the south of the city for employment land is the Tower Business Centre for small businesses. There is a shortage of available workspace and the science park is full.
- York needs a conference/evening venue, York Northwest would be a good location because of rail links
- Out of centre developments, such as Clifton Moor and Monks Cross could be improved to serve communities and businesses better. For example, Clifton Moor does not have adequate facilities for staff e.g. for lunch breaks.
- Clifton Moor has significant transport and architectural issues that need to be addressed, regeneration of this area could be an option as currently the character of the area is not in keeping with York and could be anywhere. It fails to take advantage of the attraction of being located in York.
- Northminster Business Park provides a good example of high quality employment land

Potential Urban Extensions

- 5.4. Site C is considered appropriate for light industrial because of synergies with the university and city centre for inclusive communities. This site would offer more balance in terms of encouraging outward movement of people from living in the city centre to work on the south east side whereas much of that area people are currently forced to travel toward the city for employment. This balance could ease congestion issues. Site C was considered to be located on an important junction and was felt to be in a sustainable location.
- 5.5 Whist some felt that Site I offered a sustainable location others did not support it as in order for it to be sustainable and to unlock the potential of the Northminster Business Park the ring road would have to be a dual carriageway otherwise the congestion issues would make it unviable. Some felt that people would still use their cars and it was therefore not a sustainable site. It was suggested that if the transport implications of Site I were solved it would just move the transport problems elsewhere.
- 5.6 Any urban extension site must be integrated with a range of services and facilities within communities.

- 5.7 There was also significant discussion surrounding the role of employment sites within the city centre. It was noted that city centre employment sites can be successful, provided low impact businesses are located there that do not have heavy demands for vehicular access. Indeed some attendees expressed a strong preference for their business being located in the city centre. It was also argued that city centre sites in need of regeneration should be the focus of economic development, alongside development within the main urban area of appropriate scale with its surroundings, rather than developing in the green belt. There is available space above shops and in empty buildings which should be promoted first. It was suggested that we need to work on using all available elements of city centre. It was discussed that the Esher Report resulted in many businesses being moved out of the historic core to places such as Clifton Moor, there is now scope to bring some businesses back into the city centre. Conversely, some attendees also stated that the city centre is limited in what it can offer to business
- 5.8 The A19 Corridor was suggested as having good potential for future business development, as well as North Selby Mine site. However, planning restrictions currently imposed at the mine would need to be removed if this was to happen.

**York's Local Development Framework
Inclusive York Forum Workshop
Priory Street Centre
Thursday 8th October 2009
Feedback**

1.0 Introduction

- 1.1 The workshop held on Thursday 8th October 2009 as part of the Inclusive York Forum meeting was one of a series of events that have taken place over the past few months as part of the Core Strategy Preferred Options consultation. The consultation will inform the next stage in the production of this key document in York's Local Development Framework (LDF). The aim of the following note is to broadly capture the diverse range of views and opinions of those who attended the event. It should be noted that the views expressed in this note are of those who attended the workshop and not necessarily the views of City of York Council.

2.0 Programme

- 2.1 The workshop started with an introduction to the LDF Core Strategy by Martin Grainger, Principal Planning Officer at the Council. This was followed by two group discussions. The first discussion focused on identifying the issues and challenges facing York as we plan for the next 20 years and then sought people's views on the approaches proposed in the Core Strategy. The second discussion centred around designing an 'ideal neighbourhood'. Each group were provided with a potential development site and asked to identify what local facilities they felt were essential to create a successful neighbourhood.
- 2.2 Feedback from the workshop's two discussions is provided below.

3.0 Discussion One: Issues, Challenges and Core Strategy Approach

The groups were asked to comment on the key issues and challenges to creating an inclusive city, and to give their views on how these could be addressed through the LDF.

Transport and Accessibility

Buses and Public Transport

- Some people felt that there was a need for a more strategic, coordinated approach to bus services suggesting that there should be an integrated transport system with a single ticket system that works across all the bus companies.
- People felt that there was no consistency in bus services with some areas well served and others poorly served and that there should be access for the whole community.

- Some argued that even if there is a regular bus service it does not ensure accessibility, for example buses can only take one wheelchair.
- They felt that there were often other barriers to using public transport and getting to bus stops, in particular that services need to be more accessible for those with learning difficulties. Costs and times were also seen as a disincentive.
- People suggested that a better standard of public transport is needed, with operators on-board buses and reliable, up to date bus information including keeping people informed of any timetable changes.
- The information in bus shelters needs to be more accessible, particularly for those with sensory impairments, e.g. talking timetables.

Pavements, Shared Spaces and Parking

- It was felt that there is often too much focus placed on car drivers – speed limits should be reduced, particularly in residential areas, parking on pavements should be stopped and pedestrian crossings should allow more time for people to cross the road.
- We should seek to provide ‘accessible’ car parking spaces, rather than ‘disabled’ parking spaces.
- Further thought should be given to shared pavements and cycleways – it was considered that using the same path was unacceptable, causing particular problems for the mobility impaired, the elderly and those with visual impairments, and that it would be preferable to differentiate between cycling and walking routes. More information is needed for cyclists as there is confusion over which paths they can use and those which they are prohibited from using.
- All cycling routes should be properly planned and well lit.
- Shared spaces where traffic and pedestrians share the same space, was also highlighted as an issue. Their success is dependent on eye-contact between users, which is not possible for those with visual impairments.
- Shop displays and pavement cafes can create problems for the mobility impaired, for example where there are ‘A’ boards outside or the pavement is narrowed to allow for outdoor seating, especially where they have low fences or railings.
- Some argued that more thought about all potential users needed to inform the design of places particularly roads and paths.

Accessible Buildings

- Access to shops can be a significant problem for those with mobility impairments, problems include inaccessible entrances or shops with steps. This was considered to be a problem with recently refurbished shops as well as old ones and that this should be tackled through planning.
- It was felt that especially in relation to accessibility to historic buildings there was a need for more joined up thinking across Council departments, such as planning, conservation and building control.
- There are good examples of accessible historic buildings in other areas, such as Alnwick Castle in Northumberland which provides wheelchairs and wheelchair friendly lifts.

Housing

- In general, there was support for mixing different housing types to create more diverse neighbourhoods and offer more housing choices in a single area throughout a person's lifetime.
- However, it was suggested by some attendees that some residential needs may not be compatible with other people's lifestyles e.g. those with severe mental health problems.
- There was discussion about whether older people's housing should be separate (e.g. Hartrigg Oaks sheltered housing). Separating off different age groups could be seen as creating segregated environments (ghettos?) which would damage community spirit. However, some felt that older people may prefer to live away from noise and younger people. It was considered important to allow people to have a choice where they want to live, and who they have as neighbours.
- There was discussion across the groups about whether it was necessary to provide a range of homes to meet the needs of specific groups.
- Some felt that this approach needed to be dealt with carefully, recognising diverse needs. An example was given of the 'coloured door' housing which whilst appreciated by dementia sufferers, could be patronising to people with other mental health problems.
- A number of people suggested that it would be better to have design standards that would meet the needs of all, such as the Lifetime Homes standard. This would provide accessible and alterable housing to meet a diverse range of needs and it was argued that this standard should be achieved in all homes by 2013, if not before.
- However some suggested that there would still be a need for specialist homes beyond the Lifetime Homes standards to meet specific needs.
- Others felt that rather than living in Lifetime Homes people should move to more suitable housing types as their needs changed.
- They said that the approach needs to account for changing trends over time to ensure that people live in the most appropriate house for their needs – for example, 1 person living in a 4 bedroom house reduces availability for a larger family.
- Rather than concentrating on the provision of new homes, people suggested that it is also important to consider older houses, and how these can be adapted for specialist needs and for the elderly.
- People thought that initiatives to increase accessibility of houses for special needs groups needed to be based on data and forecasts.
- The policy approach must consider housing affordability so that people have a choice of accommodation options.
- Some people questioned the level of the problem with affordable housing and specialist housing in York.

Travellers

- It was highlighted that there is a shortage of sites for Travellers.
- When considering locations for new sites it was suggested that they should be considered in the same way as other housing sites because they need access to the same sorts of facilities (including play space) and

services – mostly they are located in peripheral areas to avoid ‘amenity’ concerns.

- Travellers should be entitled to tenancies on sites to overcome issues such as having to pay commercial rates for electricity.
- Accessibility to employment and education is a problem – concerns that having Traveller site as an address is a barrier to finding work. Further support is needed to make education more accessible.

Older People

- The LDF should recognise that the proportion of the elderly population is increasing and that this could be an issue for the provision of specialist homes in the future.
- Housing for older people should include provision for social activities – this could also be open for use by the wider community.
- We should consider tri-partite agreements for building housing for older people, for example between North Yorkshire County Council, City of York Council and Building Societies.
- The Older People’s Assembly asked to be involved in discussions around the newly commissioned Older Person’s Housing Needs study.

Health

- People commented on the potential crossovers with an earlier talk given by the Primary Care Trust and suggested that planning had a role to play in improving people’s health.
- This could be through ensuring access to affordable leisure facilities or ensuring access to shops to enable people to purchase their ‘5 a day’ fruit and vegetables. They also asked whether planning had a role in discouraging unhealthy lifestyles – could it control the number of takeaways?
- Accessibility to healthcare was considered to be a problem. There was discussion about the location of local surgeries and how far should you be expected to live from one. People also identified opening hours as an issue.
- There was also a discussion about whether it is better to have larger practices offering a greater range of services (including minor operations) at a district level or smaller practices at a local level.

Design

- Use ‘Secured by Design’ standards for developments, and make use of Police Architectural Liaison Officers.
- It was suggested that information on Design and Access Statements should be on the Council’s website to encourage developers to do them.
- Need to implement higher energy efficiency standards now.
- Need to consider making older homes more energy efficient.

Employment

- The scope of the voluntary and community sector as an employer should be noted.

- There was support for the statement about replacing lost manufacturing jobs, but people wanted to know more about what this means in practice.
- Planning agreements should be used to secure training facilities for disadvantaged groups and to improve the accessibility of buildings and access to information technology.
- There should be provision for everyone who wants to work in the community.
- Places of employment need to be accessible, but this is not just about physical impairments, access to information technology is also vital.
- It was suggested that there should be a flagship building in York which is fully accessible and sustainable where a variety of groups and organisations could work from. It was suggested that this could form part of the Community Stadium.

Open Space, Community and Sports Facilities

- People thought that schools should be accessible to all, in terms of their location and the buildings.
- Space should be provided for the voluntary sector within any new community facilities.
- Future plans need to consider the revenue support needed to ensure long term success and management of community buildings and spaces.
- Some raised concerns about possible reductions in library opening hours, particularly for those who do not have access to computers at home.
- Shared use of public spaces and school facilities were thought of as important because they can be used by a mix of groups. However, it was felt that open access can raise management issues and there might be a need to lock facilities when they are not in use.

Community Spirit

- There were discussions about how you generate community spirit, for example, some suggested that 'parishes' seem to have more sense of place and of belonging to a community.
- There is a need to respect people's varying needs such as the balance of privacy and contact – public and private spaces.

Consultation

- Needs to be targeted. Concerns of disadvantaged groups can be lost in the generalities of consultation.
- Need for feedback and results, it should not just be 'another consultation'. The group would like to see how the opinions and views given have helped to shape policy.

4.0 Discussion two: Creating Inclusive Communities

The groups were asked what elements they felt were essential in a community and encouraged to discuss the location of these elements and the interaction between different facilities.

People considered the following facilities to be important. Two of the groups also identified which they thought were a priority and these are marked with *:

- Local shops* including café, food store, post office.
- Shared multi-purpose community facility*.
- Green space for all ages* – playgrounds, parks, allotments, multi-use open space areas.
- Surgery / dentist*.
- Local employment opportunities such as small business start-up units*.
- Accessible, reliable public transport*.
- Community ‘ownership’ of space and facilities*.
- Community café.
- Good pub.
- Public toilets.
- Library.
- Integrated transport – with connections locally and city wide.
- Activities for young people.
- Sports facilities.
- Car-share and bike-share facilities/schemes.
- Local police stations - it was suggested that the police/community support officers should have a ‘base’ in each neighbourhood (e.g. have an area within a local shop for a base, or some other public building).
- Mix of housing for all ages, accessible to all.
- Places of worship. The idea of shared facilities was discussed and people suggested that a multi-faith community centre which all local groups could use would be an efficient and effective use of space. The building could be used for many uses, such as playgroups, club meetings, places of worship for different faiths etc (e.g. Friends Meeting House).
- Schools – these could also be used by the wider community for community events.
- Community facilities for older people, that the wider community can share.
- Range of evening facilities and entertainment suitable for all.
- Spaces suitable for community activity such as fetes and festivals to help create a good community atmosphere.

In terms of the location of facilities, attendees gave the following feedback:

- Facilities should be clustered in a central location in the community.
- Co-locating of facilities was considered to be important.
- Open space should be spread around the community.
- Locations should feel secure and be well lit.
- Natural overlooking of facilities can help prevent vandalism.
- Housing for older persons and disabled people should be close to community facilities.

General Comments

- Some people argued that it was too simplistic to just think of facilities as either city wide or local. They suggested that it was appropriate for some facilities, such as sports facilities or larger doctor’s surgeries, to be provided at a district level. We should therefore be thinking of a 3 tier approach, identifying city wide facilities, district facilities, and local facilities.

- People thought that neighbourhoods can vary in scale – for example, Clifton is a neighbourhood, but on a smaller scale, the housing development at York Business Park can also be regarded as a ‘local’ neighbourhood.
- Clifton was suggested as an almost perfect example of a local neighbourhood in terms of facilities – 10/15 minutes walk from the City Centre, good range of shops, pubs, playspace / dog walking areas, riverside paths. But is restricted by the bus service (a frequent reliable bus service is considered critical to a neighbourhood). On the opposite end of the scale, areas with no facilities were regarded as poor neighbourhoods (although people thought that they can still have good community spirit).
- People thought that some areas of the city, especially those predominantly of terraced properties, are more densely populated and therefore public open space has a particular role and value because homes do not have private gardens, this was felt to be especially important with regard to children’s playspace.
- Neighbourhoods need to have facilities to serve their communities such as doctors surgeries, but they need to be supported by a population of an adequate size.
- Many people use both large supermarkets and small local shops. They might do a weekly shop at a big supermarket and then use local neighbourhood shops / corner shop throughout the week. However, people were concerned that the local shops will still find it difficult to compete with supermarkets.
- The Council should have mechanisms in place which encourage and support initiatives by local residents in local neighbourhoods (for example, open spaces provided at parish level).
- Accessibility to buildings is vital. They also need to be welcoming for all. One respondent gave an example of the new Acomb library which is not inviting to older people because of more detailed design issues such as signs and the choice of furniture.
- It was suggested that we should be more creative in designing places – consider ‘home zones’ or underground parking to create streets which are free of cars.
- Need for equipped play space in the city centre, suggestions included play equipment in Museum gardens and a sand pit in Parliament Street.

Annex 1

List of Consultees

Specific Consultation Bodies

Government Office Yorkshire & Humber	Kyle & Upper Ouse Internal Drainage Board
Acaster Malbis Parish Council	Lillings Ambo Parish Council
Acaster Selby & Appleton Roebuck Parish Council	Local Government Yorkshire and Humber
Askham Bryan Parish Council	Long Marston Parish Council
Askham Richard Parish Council	Moor Monkton Parish Council
Bilborough Parish Council	Murton Parish Council
Bishopthorpe Parish Council	Naburn Parish Council
BT Group plc	National Grid
Catton Parish Council	Natural England
Claxton & Sandhutton Parish Council	Nether Poppleton Parish Council
Clifton Without Parish Council	Network Rail
Colton Parish Council	New Earswick Parish Council
Copmanthorpe Parish Council	Newton on Derwent Parish Council
DE Operations North (Catterick Office)	North Yorkshire & York PCT
DEFRA	North Yorkshire County Council
Deighton Parish Council	Northern Gas Networks
Department for Constitutional Affairs	Office of Government Commerce
Department for Media, Culture & Sport	Osbaldwick Parish Council
Department for Work & Pensions	Overton Parish Council
Department of Trade & Industry	Powergen Retail Ltd
Dunnington Parish Council	Rawcliffe Parish Council
Earswick Parish Council	Rufforth with Knapton Parish Council
East Cottigwith Parish Council	Ryedale District Council
East Riding of Yorkshire Council	Selby District Council
Elvington Parish Council	Sheriff Hutton Parish Council
English Heritage Yorkshire and the Humber Region	Shipton Parish Council
Environment Agency	Skelton Parish Council
Escrick Parish Council	Stamford Bridge Parish Council
Flaxton Parish Council	Stillingfleet Parish Council
Fulford Parish Council	Stockton on the Forest Parish Council
Gate Helmsley & Upper Helmsley Parish Council	Strensall & Towthorpe Parish Council
Government Office Yorkshire & Humber	Sutton upon Derwent Parish Council
Hambleton District Council	Sutton-on-the-Forest Parish Council
Harrogate Borough Council	The Coal Authority Planning & Local Authority Liaison Department
Harton Parish Council	Thorganby Parish Council
Haxby Town Council	Upper Poppleton Parish Council
Heslington Parish Council	Warthill Parish Council
Hessay Parish Council	Wheldrake Parish Council
Heworth Without Parish Council	Wiggington Parish Council
Highways Agency	York Consortium of Drainage Boards
Holtby Parish Council	York Health Services NHS Acute Trust
Home Office	Yorkshire Ambulance Service NHS Trust
Huby Parish Council	Yorkshire Forward
Huntington Parish Council	Yorkshire Water - Land Property & Planning
Kexby Parish Council	

General Consultation Bodies

British Geological Survey	Safer York Partnership
Business Link York & North Yorkhsire	Science City York
CABE	The War Memorial Trust
CBI	Visit York (formerly York Tourism Partnership)
Churches Together in York	York & North Yorkshire Chamber of Commerce
Commission for Racial Equality	York City Centre Partnership Ltd
Community Rangers	York Council for Voluntary Service
Disability Rights Commission	York Diocesan Office
Disabled Persons Advisory Group	York England
Equality and Human Rights Commission	York Guild of Building
Forestry Commission	York Hospitals NHS Trust
Help the Aged	York Minster
Housing Corporation	York Mosque
Institute of Directors Yorkshire	York Racial Equality Network
National Farmers Union	York Science Park
National Museum of Science & Industry	York-Heworth Congregation of Jehovah's Witnesses
North Yorkshire & York Primary Care Trust	Yorkshire Business Pride (City Centre Partnership)
Patients Forum	
Royal Institute of Chartered Surveyors	

Other Groups/Organisations

20th Century Society	Barratt Developments PLC
3Ps People Promoting Participation	Barratt Homes (York) Ltd
5 LLP	Barry Crux and Company
A J M Regeneration Ltd	BBC Radio York
Acomb Green Residents Association	Beck Developments
Acomb Planning Panel	Bell Farm Residents Association
Acomb Residents	Belvoir Farm Partners
Action Access A1079	Bettys Café Tea Rooms
Active York	Bio-Rad Laboratories Limited
Adams Hydraulics Ltd	Bishop of Selby (Diocese of York)
Age Concern	Bishophill Action Group
All Saints RC School	Blackett, Hart & Pratt LLP
Alliance Planning	Boots plc
Ancient Monuments Society	Bovis Homes Ltd
Andrew Martin Associates	Bramhall Blenkham Architects Ltd
Arriva Yorkshire	Bright Street Sub Post Office
ASDA Stores Ltd	British Waterways (Yorkshire Office)
Ashtenne Asset Management Ltd	Browns of York
Ashtenne Industrial Fund LLP	BTCV (York)
Askham Bryan College	Buccleuch Property
Askham Grange	Cadbury Trebor Bassett Ltd
Associated British Foods plc	Cambridge Street Residents Association
Atisreal UK (Consultants)	Camerons Megastores
BAGNARA	Campaign for Better Transport (Formerly Transport 2000)
Bang Hair	Campaign for Real Ale

Draft Consultation Statement & Schedule of Responses (2010)

Carers Together	Dobbies Garden Centres PLC
Carl Bro	Dodsworth Area Residents Association
Carr Junior Council	DPDS Consulting Group
Cass Associates	Dringhouses and Woodthorpe Planning Panel
CB Richard Ellis	Dringhouses West Community Association
CE Electric UK	DTZ
CEMEX	Dunnington Residents Association
Centros	DWA Architects
CgMs	Economic Development Board
Chapelfields Residents Association	Elvington Park Ltd
Chris Thomas Ltd Outdoor Advertising Consultants	Energy Efficiency Advice Centre
Christmas Angels	England & Lyle
Church Commissioners for England	Entec UK Ltd
Civil Aviation Authority	Environment Forum
Clementhorpe Community Association	Erinaceous
Clifton Moor Business Association	Euro Car Parks Ltd
Clifton Planning Panel	Evans of Leeds Ltd
Clifton Residents Association	EWS
Colliers CRE	F & B Simpson D Kay and J Exton
Commercial Development Projects Limited	Faber Maunsell
Commercial Estates Group	Family Housing Association (York) Ltd
Company of Merchant Adventurers of the City of York	Family Mediation
Composite Energy Ltd	Farming & Wildlife Advisory Group
Confederation of Passenger Transport (Yorkshire)	Federation of Residents and Community Associations
Connexions	Federation of Small Businesses
Conservation Area Advisory Panel	Fenwick Ltd
Constructive Individuals	First York
Copmanthorpe Residents Association	First/Keolis Transpennine Ltd
Cornlands Residents Association	FLP
Costco Wholesale UK Ltd	Foxwood Residents Association
Council for British Archaeology	FRD Ltd
Countryside Properties (Northern) Ltd	Freight Transport Association
CPP Group Plc	Friends Families & Travellers
CPRE (York and Selby District)	Friends of St Nicholas Fields
Craftsmen in Wood	Friends of the Earth (York and Ryedale)
Crease Strickland Parkins	Fulford Residents Association
CRED Ltd (Carbon Reduction)	Fusion Online
Crockey Hill Properties Limited	Future Prospects
Crosby Homes	Garden History Society
CSSC Properties Ltd	George Wimpey North Yorkshire Ltd
CTC North Yorkshire	George Wimpey Strategic Land
Cunnane Town Planning LLP	George Wimpey West Yorkshire Ltd
CYC Mansion House	Geraldeve
Cyclists Touring Club (York Section)	GHT Developments Ltd
Dacre Son & Hartley	Gillygate Surgery
Dales Planning Services	Gordons LLP
David Chapman Associates2488	Grantside Ltd
Diocese of Ripon and Leeds	Green Land & Property Holding Ltd
Disabled Peoples Forum	Greenwood Residents Association

Draft Consultation Statement & Schedule of Responses (2010)

Grosvenor Residents Association	LEAF
Groves Neighbourhood Association	Leda Properties Ltd
Guildhall Planning Panel	Leeds City Council
GVA Grimley LLP	Leeman Road Community Association
Halcrow Group Ltd	Leeman Road Millennium Green Trust
Halifax Estates	Leeman Stores
Hallam Land Management Ltd	LHL Architects
Hartley Planning Consultants	Lidgett Grove Scout Group
Haxby & Wiggington Youth & Community Association	Lifelong Learning Partnership
Health & Safety Executive	Lindsey Residents Association
Healthy City Board	Lions Club
Her Majesty's Courts Service	Lister Haigh Ltd
Heslington East Community Forum	Lives Unlimited
Heslington Sports Field Management Committee	Local Dialogue LLP
Heslington Village Trust	Loxley Homes
Heworth Planning Panel	LXB Properties Ltd
Higher York Joint Student Union	Marks & Spencer plc
Hogg Builders (York) Ltd	Marsden Homes Ltd
Holgate Ward Labour Party	McArthur Glen Designer Outlet
Home Builders Federation	McCarthy & Stone Ltd
Home Housing Association	Meadlands Residents Association
Howarth Timber Group	Melrose PLC
Hull Road Planning Panel	Mental Health Forum
I D Planning	Metro
Include Us In - York Council for Voluntary Service	Micklegate Planning Panel
Inclusive City	Miller Homes Ltd
Indigo Planning Ltd	Minsters Rail Campaign
Institute of Citizenship	Monks Cross Shopping Centre
Jan Molyneux Planning	Mouchel
Jarvis Plc	Mulberry Hall
Jennifer Hubbard Planning Consultant	Muncaster Residents Association
Job Centre Plus	Nathaniel Lichfield
Joseph Rowntree Foundation	National Car Parks Ltd
Joseph Rowntree Housing Trust	National Centre of Early Music
Kentmere House Gallery	National Express Group Plc
KeyLand Developments Ltd	National Federation of Bus Users
Kindom	National Grid Property Ltd
King Sturge LLP	National Offender Management Service
Kingsway West Residents Association	National Playing Fields Associations
Knapton Lane Residents Association	National Rail Supplies Ltd
Knight Frank	National Railway Museum
La Salle UK Ventures	National Trust
Lambert Smith Hampton	Natural England
Land Securities Plc	Navigation Residents Association
Land Securities Properties Ltd	Nestle UK Ltd
Landmatch Ltd	Network Rail
Lands Improvement	Newsquest (York) Ltd
Langleys	NMSI Planning & Development Unit
Lawrence Hannah & Skelton	North Yorkshire Fire & Rescue Service

Draft Consultation Statement & Schedule of Responses (2010)

North Yorkshire Forum for Voluntary Organisations	Residents of Runswick Avenue, Beckfield Lane & Wetherby Road
North Yorkshire Learning & Skills Council	RIBA Yorkshire
North Yorkshire Police Authority	River Foss Society
NorthCountry Homes Group Ltd	Road Haulage Association
Northern Affordable Homes Ltd	Robinson Design Group
Northern Planning	Rollinson Planning Consultancy
Northern Rail	Royal Mail Group Plc
Northminster Properties Ltd	Royal Mail Group Property
Norwich Union Life	RPS Planning & Development
Novus Investments Ltd	RSPB
Npower Renewables	RSPB (York)
Nunnery Residents Association	RTPI Yorkshire
NXEC	Rushbond Group
Oakgates (York) Ltd	Safer York Partnership
Older Citizens Advocacy York	Sainsbury's Supermarket Ltd
Older People's Assembly	Sanderson Weatherall
O'Neil, Beechey, O'Neil Architects	Sandringham Residents Association
O'Neill Associates	Savills
Opus Land Ltd	Scarcroft Residents Association
Osballdwick Parish Council	Science City York
P & O Estates	Scott Wilson
Park Grove Residents Association	Scottish Power
Parochial Church Council Church of the Holy Redeemer	Selby & York Primary Care Trust
Passenger Transport Network	Shelter
Paul & Company	Shepherd Construction
Persimmon Homes Yorkshire Ltd	Shepherd Design Group
Piccadilly Autos	Shepherd Homes Ltd
Pilcher Developments Ltd	Shirethorn Ltd
PLACE/Yorkshire Wildlife Trust	Siemens Transportation Systems
Places for People	Signet Planning
Planning Prospects Ltd	Skelton Consultancy
Playing Fields Association (York & North Yorkshire)	Skelton Village Trust
Plot of Gold Ltd	Smiths Gore
Poppleton Road Memorial Hall	Society for the Preservation of Ancient Buildings
Poppleton Road Primary School	South Parade Society
Poppleton Ward Residents Association	Spawforth Associates
Portford Homes Ltd	Speedy Wine
Positive Planet	Sport England
Potts Parry & Ives Chartered Architects	Spurriergate Centre
Pre-School Learning Alliance	St Georges Place Residents Association
Purey Cust Nuffield Hospital	St Paul's Church
Quintain Estates & Development plc	St Paul's Square Residents Association
R S Cockerill (York) Ltd	St Sampson's Centre
Railway Heritage Trust	Starbucks Coffee Company
Ramblers Association (York Area)	Stephenson & Son
Rapleys	Stewart Ross Associates
Raymond Barnes Town Planning Consultant	Stockholme Environment Institute
Redrow Homes (Yorkshire) Ltd	Stone Soup
REIT	

Draft Consultation Statement & Schedule of Responses (2010)

Storeys:ssp Ltd	UK Coal Mining Ltd
Strutt and Parker	United Co-operatives Ltd
Supersave Ltd	University of York
Sustrans	Vangarde
T H Hobson Ltd	Veolia Transport UK Ltd
Talkabout Panel	Victorian Society
Tang Hall and Heworth Residents	Visit York
Tangerine	Voluntary Sector Forum for Learning Difficulties
Taylor Wimpey UK Ltd	W A Fairhurst & Partners
Terence O'Rourke	W M Birch & Sons Ltd
Tesco Stores Limited	Walmgate Community Association
The Barton Willmore Planning Partnership Anglia	Walton & Co
The British Wind Energy Association	Ware and Kay LLP
The Castle Area Campaign Group	Water Lane Ltd
The College of Law	Welcome to Yorkshire
The Co-operative Group	Westgate Apartments
The Crown Estate Office	Wheatlands Community Woodland
The Dataquest Partnership	White Young Green Planning
The Development Planning Partnership	Whizzgo
The Dragon Fireplace Company	Wilton Developments Ltd
The General Store	Wimpey Homes
The Georgian Group	Without Walls Board
The Grimston Bar Development Group	WM Morrison Supermarkets PLC
The Gypsy Council	Woodlands Residents Association
The Helmsley Group Ltd	World Heritage Working Group
The Inland Waterways Association Ouse-Ure Corridor Section	WR Dunn & Co. Ltd.
The JTS Partnership	WSP Development and Transportation
The Land and Development Practice	Wyevale Garden Centres
The Landowners Consortium	York & District Citizens Advice Bureau
The Moor Lane Consortium	York & District Trade Council
The North Yorkshire County Branch of the Royal British Legion	York & North Yorkshire Business Environmental Forum
The Retreat Ltd	York Access Group
The Showmen's Guild of Great Britain	York Ainsty Rotary Club
The Theatres Trust	York Air Museum
The Wilberforce Trust	York and District Trades Union Council
The Woodland Trust	York and North Yorkshire Partnership Unit
Theatre Royal	York Arc Light
Tiger Developments	York Archaeological and Yorkshire Architectural Society
Tilstons Newsagents	York Archaeological Forum
Tom Adams Design Consultancy	York Archaeological Trust
Top Line Travel of York Ltd	York Autoport Garage
Tower Estates (York) Ltd	York Blind & Partially Sighted Society
Tribal MJP	York Business Park Developments Ltd
Trustees for Monks Cross Shopping Park	York Carers Together
Trustees of Mrs G M Ward Trust	York Central Landowners Group
Tuke Housing Association	York City Centre Churches
Tullivers	York City Centre Ministry Team/York Workplace Chaplaincy/One Voice
Turley Associates	York Civic Trust

Draft Consultation Statement & Schedule of Responses (2010)

York Coalition of Disabled People	York Railway Institute Angling Section
York College	York Residential Landlords Association
York Conservation Trust	York Residents Against Incineration
York Cycle Campaign	York St John University
York District Sports Federation	York Student Union
York Environment Forum	York Tomorrow
York Georgian Society	York Traveller's Trust
York Green Party	York TV
York Homeless Forum	York Women's Aid
York Hospitality Association	York@Large
York Hospitals NHS Foundation Trust	Yorkshire & The Humber Strategic Health Authority
York Housing Association Ltd	Yorkshire Architectural and York Archaeological Society
York in Transition	Yorkshire Coastliner
York Leisure Partnership	Yorkshire Footpath Trust
York Minstermen	Yorkshire Housing
York Museums Trust	Yorkshire Inland Branch of British Holiday & Home Parks Association
York Natural Environment Panel	Yorkshire Local Councils Association
York Natural Environment Trust	Yorkshire MESMAC
York Older People's Assembly	Yorkshire Naturalists Union
York Open Planning Forum	Yorkshire Philosophical Society
York Ornithological Club	Yorkshire Planning Aid
York People First 2000	Yorkshire Rural Community Council
York Practice Based Commissioning Group	Yorkshire Wildlife Trust
York Professional Initiative	Yorwaste Ltd
York Property Forum	Youth Forum
York Racecourse Committee	Youth Service - V & I Coordinator
York Railway Institute	

In addition 950 individuals from the LDF database were consulted, this includes those who had responded on previous consultations and those who had registered an interest in the LDF. Local MPs and MEPs were also formally consulted, as well as other CYC departments.

Annex 2

Planning York's Future Questionnaire

Planning York's



Future



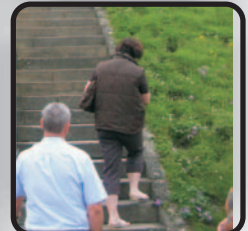
This leaflet is a brief summary of the key issues we are looking at in preparing a new development plan for York called the Local Development Framework (LDF) Core Strategy. It asks questions on the main issues and preferred approaches to planning York.



If you'd like more detail on the issues raised in this leaflet, a full Core Strategy document, along with further information on the consultation, will be available on the council's website www.york.gov.uk/LDF/corestrategy. An 'Online Survey' is also available, or you can contact the Forward Planning team (01904 551466). Further information will also be available over the summer in your local library as well as at a range of events across the city such as exhibitions at your local Ward Committee.

By filling in this questionnaire you're helping to plan the long term future of your city.

Please tell us what you think by Friday 28th August 2009.



LDF Vision for York

The Sustainable Community Strategy provides the overall vision for York. The plan (LDF) aims to deliver its planning or land use elements, whilst responding to both the key challenges facing York and wider environmental challenges such as climate change.

LDF VISION

York aspires to be: a city of confident, creative and inclusive communities; economically prosperous at the forefront of innovation and change; and a world class centre for education; whilst preserving and enhancing its unique historic character and setting and fulfilling its role as a leading environmentally friendly city. This will be achieved in a way that ensures that York fulfils its role at the centre of the York Sub Area and as a part of the Leeds City Region. The plan (LDF) will take this agenda forward providing a planning framework to 2030 and beyond for the city's sustainable development.

KEY THEMES

**Building Confident,
Creative and Inclusive
Communities**

**A Prosperous
and Thriving
Economy**

**An
Environmentally
Friendly City**

**York's Special
Historic and Built
Environment**

Q1. Do you think that this Vision Statement and the four themes above are appropriate for York?

a. Yes

☐

b. No

☐

If no, what needs to be changed?

Future Growth

In planning for future growth the plan (LDF) will focus development within the main built up area of York and its surrounding villages maximising the use of brownfield land. Land outside these areas, currently within the draft Green Belt, would only be considered for development once these options had been exhausted. This would clearly be dependent upon issues relating to the need for land for jobs and homes.



Land for Jobs

A study undertaken in 2007-08 predicted that York's economy would grow by over 1,000 jobs per year, similar to the past 10 years. In spite of the current recession, the council still feels that this is reasonable, as over the long plan period (20 years) there are bound to be ups and downs in the economy. The majority of the new jobs will be accommodated within York's main built up area however additional land is likely to be needed outside the main built up areas, for industry and distribution.

Q2. Do you agree with the number of predicted jobs?

a. Yes

☐

b. No, should be higher

☐

c. No, should be lower

☐

Land for Homes

The Regional Plan requires that York provides an average of 850 new homes a year until 2026. This is less than the number of homes you would need if you simply looked at the city's population projections. Using a figure of 850 homes per year over the full period of the plan, up to 2030 we would have a shortfall of land for 6,600 homes that we couldn't accommodate in the main built up areas of York. In the past, York has benefitted from a significant number of 'windfall' sites; these are brownfield sites that become available at short notice, for example the Terry's factory. National guidance does not let us make an allowance for as yet unidentified new windfalls to be included in the plan but as we are planning over a long period we have included an allowance of 2,200 windfalls beyond 2025.

If we include these windfalls then the shortfall is reduced to 4,400 homes which we may need to accommodate on land outside York's main built up areas, currently within the draft Green Belt. Concerns have been expressed about the impact this may have on the city's setting, natural environment and services.

Q3. In light of the current recession, but given the long timescale of the plan(LDF) and housing pressures in York, do you think we should:

	Agree	Less	More
▪ up to 2026, build 850 homes per year	☐	☐	☐
▪ between 2026-2030, build 850 homes per year	☐	☐	☐

If we were able to use windfalls this could reduce the amount of land we need to develop in the draft Green Belt.

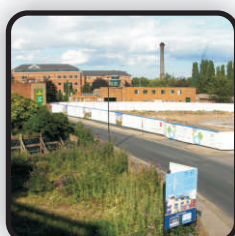
Q4. Do you think that the council should be allowed to include a higher level of windfalls in the plan (LDF)?

- a. Yes ☐ b. No ☐

Another way of minimising the amount of draft Green Belt land needed for homes would be to build at higher densities in existing built up areas.

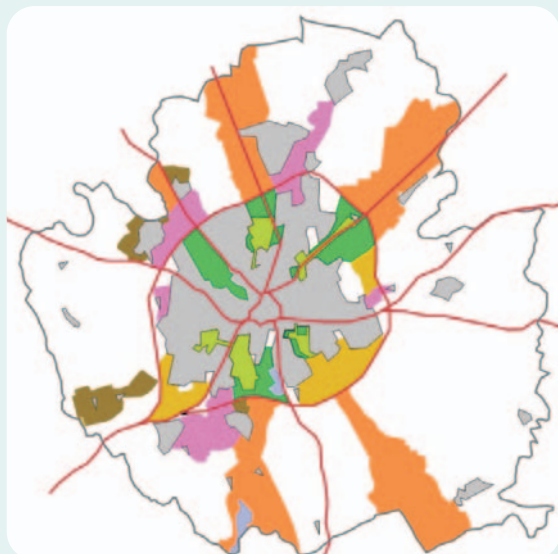
Q5. Would you be prepared to see more densely built developments than those which currently exist in your area to reduce the need for development on land currently in the draft Green Belt?

- a. Yes ☐ b. No ☐



Planning York's Future

We recognise the main built up area of York as being the primary focus for housing, jobs, shopping, leisure, education, health and cultural activities and facilities. However, as highlighted we may need, through the plan (LDF) process, to find land outside the main built up areas of York for employment and housing. If we need to take this approach, it will be based upon the following:



1. Protecting areas that preserve York's Historic Character and Setting

- River Corridor
- Strays
- Green Wedge
- Extension of the Green Wedge
- Areas retaining rural setting
- Areas preventing coalescence
- Village Setting

Q6a Do you think that this is appropriate?

Yes ☐ No ☐

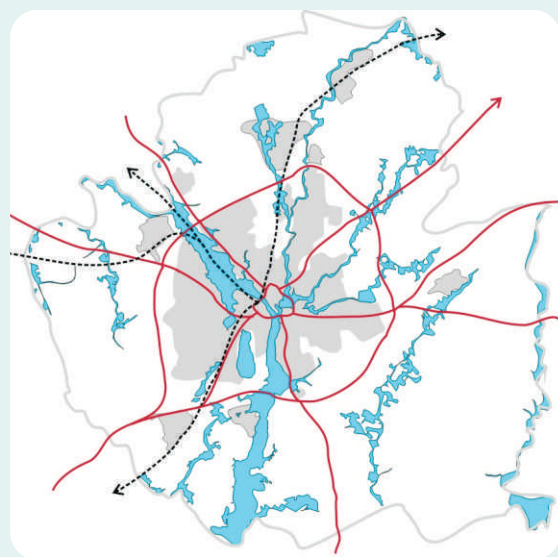


2. Protecting York's Green Infrastructure including Green Corridors and Nature Conservation Sites

- Regionally significant green corridors (We are currently undertaking further work to identify District and Local Green Corridors, which will also play a key role in the future planning of York)
- Nationally, regionally and locally designated nature conservation sites

Q6b Do you think that this is appropriate?

Yes ☐ No ☐



3. Minimising Flood Risk

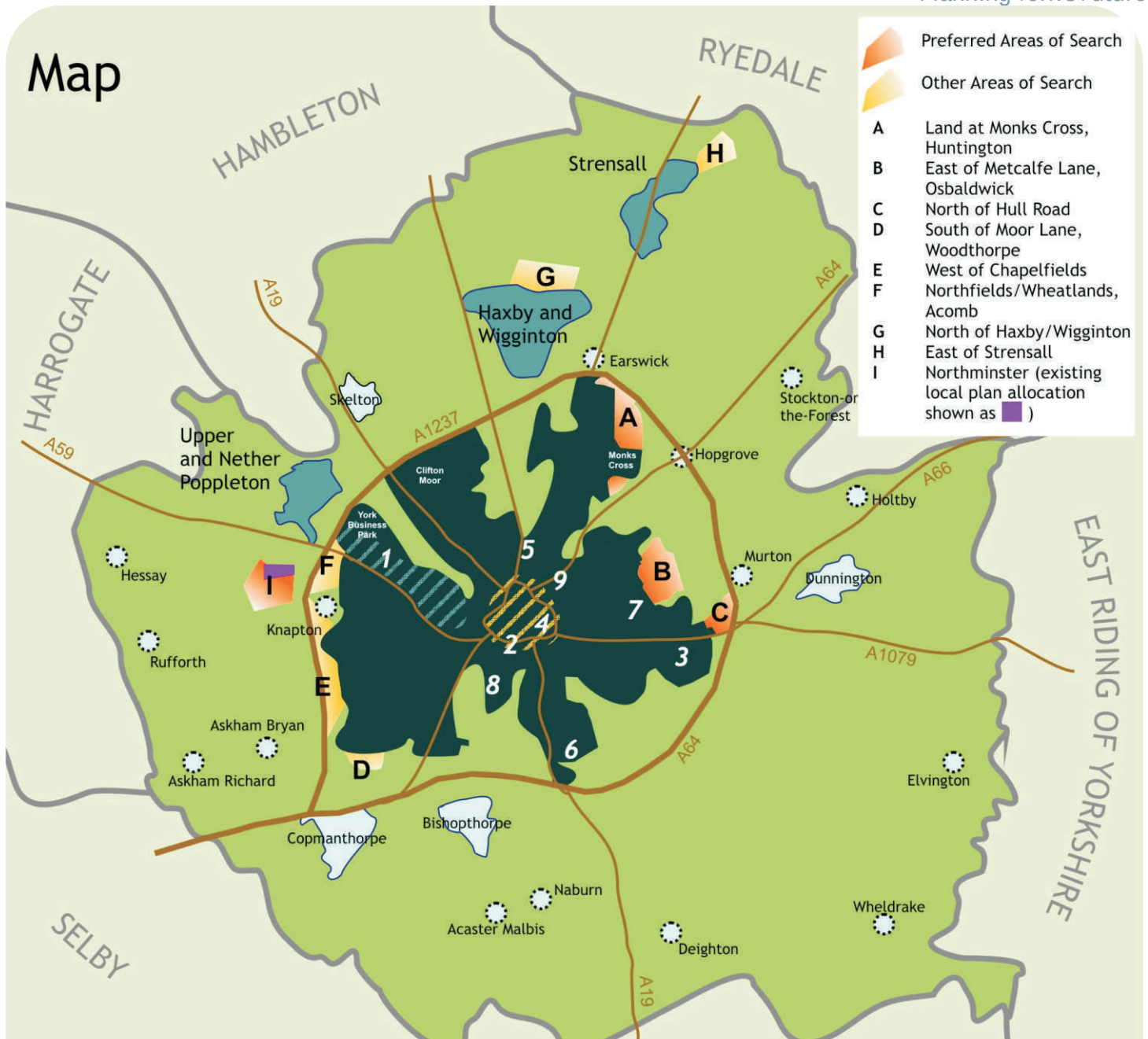
- Highest risk Flood Zones

Q6c Do you think that this is appropriate?

Yes ☐ No ☐

Q6d What other issues do you think we should consider?

When the above are brought together, this leads to nine potential areas currently in draft Green Belt (A-I on the facing map) where development could be accommodated should additional land be needed. We then looked further at the transport network, landscape character, agricultural land quality and open space levels. This leads to areas A, B, C and I as the preferred options, with A and B suitable for housing and C and I most suitable for employment.



Q7. Do you think it is appropriate to identify land for development in the draft Green Belt?

- a. Housing yes ☐ no ☐
- b. Employment yes ☐ no ☐

Q8. If we need to identify land for new homes do you think that areas A and B, currently in the draft Green Belt, are the most suitable locations?

- a. yes ☐ b. no ☐

If no, which other areas would be more suitable? (please mark on the map)

Q9. If we need to identify land for employment do you think that areas C and/or I are suitable locations for industrial and distribution employment areas?

- a. area C ☐ b. area I ☐ c. neither ☐

Which other areas would be suitable?

York's special
Historic and Built
Environment

Q10. How important is fully understanding the special character of York in informing high quality new design?



Not important 1 2 3 4 5 Very important (Please circle)

Building confident,
creative and
inclusive
communities

Q11. York is in a high demand area for affordable housing and need each year is higher than the total number of houses built. The council currently negotiates with developers to provide up to 50% affordable housing on medium to large sites in the main built up area and on small to large sites in the villages. Developers say this is too high. The 50% target can be reduced if evidence is provided to show that development is not viable at this level.

Should we:

- a. ☐ continue to negotiate for up to 50% only on medium to large sites in the main built up area and on small sites in villages. On site provision would be prioritised;
- b. ☐ require a level of affordable housing on all sites in the city, increasing from 20% (on small sites) to 50% (on large sites). In villages, continue the target of 50% on sites of two or more homes. On site provision would be prioritised;
- c. ☐ require a level of affordable housing or equivalent financial contribution (which could, for example, be used to buy existing empty properties) in both the city and villages increasing from 10% (on small sites) to at least 40% (on large sites). Developers have an option to supply properties off site from their main development.

Q12. A recent housing study shows that in the past we have built too many flats and not enough family houses, and that the longer term need is for two thirds houses and one third flats. The LDF is planning for a 20 year time period and demand for smaller properties may increase during this time, given the trend towards smaller family groups. Smaller properties, such as flats, would mean more homes could be accommodated within the main built up area, reducing pressure on the draft Green Belt. Do you agree that we should build more houses (around two thirds) than flats (around one third)?

a. Yes ☐ b. No ☐

Do you think that this should increase to a greater number of smaller properties, such as flats, towards the end of the plan period if this reflects the changing needs of York?

a. Yes ☐ b. No ☐



Q13. Following a recent employment study, we have identified the following areas for new office development. Please tick those that you feel are appropriate:

- York City Centre ☐
- A new office quarter at York Central (behind York station) ☐
- As part of the redevelopment at Layerthorpe ☐
- As part of the redevelopment at Terry's ☐
- As part of the redevelopment at Nestle ☐
- Monks Cross ☐



Do you have any comments? _____

Q14. Whilst York city centre will remain the main focus for shopping development, there are limited opportunities to increase the number of shops. This is important in maintaining York's role as a key shopping location allowing for competition with other key shopping locations. We think that the following locations may be suitable for new shops. Which do you feel are suitable?

- a. Castle Piccadilly ☐ b. Stonebow area ☐ c. York Central (behind the station) ☐
 d. Other (please specify) _____

Q15. After the city centre, two district shopping centres are currently identified at Acomb and Haxby. District centres generally serve a local neighbourhood and contain a range of shops and services such as banks, building societies and restaurants as well as local public facilities such as a library. Do you think that there are any other district centres in York? _____

Q16. A key role of the plan (LDF) is to promote sustainable development, this includes addressing the issues of climate change. Which of the methods below, do you think will be most effective in York?

- a. By promoting renewable energy on site (e.g. solar panels) ☐
- b. By promoting renewable energy off site (e.g. wind turbines) ☐
- c. Promoting sustainable design and construction techniques ☐
- d. Providing alternative means to landfill to dispose of waste ☐
- e. Ensuring that new development does not add to the flooding and drainage problems in York ☐
- f. Encourage low emission transport systems ☐
- g. Other _____ ☐

Q17. The approach to transport set out in the plan (LDF) aims to minimise the need to travel thereby reducing congestion and reliance on the private car. It will help achieve this through encouraging walking and cycling and the use of public transport in addition to improving access to services. Do you agree with the above approach for transport?

- a. Yes ☐ b. No ☐

Key transport schemes to help support this approach are available on the councils website 'online survey' to allow you to make more detailed comments.

Q18. York's parks, open spaces, nature conservation sites, river corridors are part of the city's green infrastructure. We intend to protect and improve these existing green assets whilst also addressing "gaps" in provision. Do you agree with this approach?

- a. Yes ☐ b. No ☐

Which parks and open spaces do you think need to be improved and where do you think new ones are needed?





Tuck Flap A in here

If you would like this information in an accessible format (for example in large print, on tape or by email) or another language please telephone: (01904) 551466 or email: citydevelopment@york.gov.uk or come to our offices at 9, St Leonard's Place, York

This information can be provided in your own language.

我們也用您們的語言提供這個信息 (Cantonese)

এই তথ্য আপনার নিজের ভাষায় দেয়া যেতে পারে। (Bengali)

Ta informacja może być dostarczona w twoim własnym języku. (Polish)

Bu bilgiyi kendi dilinizde almanız mümkündür. (Turkish)

یہ معلومات آپ کی اپنی زبان (بولی) میں بھی مہیا کی جاسکتی ہیں۔ (Urdu)

☎ (01904) 551550



CITY OF
YORK
COUNCIL



© City of York Council 2009. Published by City Strategy. Printed on environmentally friendly paper. This leaflet cost 5p per York resident to design, print and distribute, a total of £9,574. Printed by Peter Turpin Associates, York.

Fold along this line second

Fold along this line first

City Development
City Strategy
City of York Council
FREEPOST (YO239)
York
YO1 7ZZ

Fold along this line last

Any other comments

**Please provide the first
part of your postcode,
eg YO24 3XX**

					X	X

Flap A

Annex 3

Consultation Schedule

Annex A: Consultation Schedule	
Date	Task/Event
Week One	
Monday 29th June	
Tuesday 30th June	Holgate Ward Committee
Wednesday 1st July	Rural West Ward Committee
	Westfield Ward Committee
Thursday 2nd July	Skelton, Rawcliffe and Clifton Without Ward Committee
	Learning City Partnership Board
	Dringhouses and Woodthorpe Ward Committee
Friday 3rd July	
Week Two	
Monday 6th July	Clifton Ward Committee
Tuesday 7th July	Fishergate Ward Committee
	Heworth Ward Committee
Wednesday 8th July	Haxby & Wigginton Ward Committee
Thursday 9th July	York at Large Board
Friday 10th July	
Week Three	
Monday 13th July	Strensall Ward Committee
	Guildhall Ward Committee
Tuesday 14th July	WOW Board
Wednesday 15th July	Yor OK Board
	Hull Road Ward Committee
Thursday 16th July	Micklelegate Ward Committee
Friday 17th July	
Week Four	
Monday 20th July	Derwent, Heworth Without & Osballdwick Ward Committee
	Heslington & Fulford Ward Committee
Tuesday 21st July	Environment Forum
	Acomb Ward Committee
	Huntington & New Earswick Ward Committee
Wednesday 22nd July	Bishopthorpe & Wheldrake Ward Committee
Thursday 23rd July	
Friday 24th July	CYC Staff Exhibition

Week Five	
Monday 27th July	
Tuesday 28th July	One day Conference Event for interest groups and members of the Talkabout Panel and developers.
Wednesday 29th July	
Thursday 30th July	
Friday 31st July	City Centre Exhibition in St Sampsons Square
Saturday 1st August	City Centre Exhibition in St Sampsons Square
Week Six	
Monday 3rd August	
Tuesday 4th August	York Reference Library exhibition
Wednesday 5th August	
Thursday 6th August	
Friday 7th August	
Week Seven	
Monday 10th August	Inclusive York Forum
Tuesday 11th August	Key employer exhibition - Shepherd Industrial Division
Wednesday 12th August	
Thursday 13th August	
Friday 14th August	Key employer exhibition - Primary Care Trust
Week Eight	
Monday 17th August	
Tuesday 18th August	Open Planning Forum
Wednesday 19th August	Designer Outlet Exhibition
Thursday 20th August	Monks Cross Shopping Centre exhibition
Friday 21st August	

Week Nine (poss CPP exhibition this week)	
Monday 24th August	York Independent Living Forum - York Hospital
Tuesday 25th August	
Wednesday 26th August	CPP Employers exhibition
Thursday 27th August	
Friday 28th August	
Week Ten	
Monday 31st August	BANK HOLIDAY
Tuesday 1st September	
Wednesday 2nd September	
Thursday 3rd September	
Friday 4th September	
Week Eleven	
Monday 7th September	
Tuesday 8th September	
Wednesday 9th September	Environment Partnership
	York Archaeological Forum
Thursday 10th September	Economic Development Partnership
Friday 11th September	
Week Twelve	
Monday 14th September	Voluntary Sector Strategic Forum meeting
	Meeting East Riding of Yorkshire Council
	York Property Forum and Chamber of Commerce meeting
Tuesday 15th September	
Wednesday 16th September	
Thursday 17th September	York College exhibition
	Meeting with Ryedale District Council
	Meeting with Government office Yorkshire and Humber
Friday 18th September	

Week Thirteen	
Monday 21st September	Affordable Housing Focus Group
Tuesday 22nd September	
Wednesday 23rd September	Meeting with Local Government Yorkshire and Humber
	Green Party Meeting
Thursday 24th September	
Friday 25th September	Civic Trust meeting
Week Fourteen	
Monday 28th Sept	York Professionals and York Business Forum event
Tuesday 29th Sept	Environment Agency meeting
Wednesday 30th Sept	
Thursday 1st October	Meeting with Leeds City Council
Friday 2nd October	English Heritage meeting
	Natural England meeting
Week Fifteen	
Monday 5th Oct	
Tuesday 6th Oct	
Wednesday 7th Oct	Fulford Parish Council meeting
Thursday 8th Oct	Inclusive York Forum workshop
Friday 9th Oct	