

Annex 1: Consultation Responses to Vision and Spatial Strategy

(Extract from Preferred Options Draft Consultation Statement – Summary
(2010))

8. Vision

Planning York's Future Questionnaire

Question 1: Do you think that this Vision Statement and the four themes above are appropriate for York?

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

Core Strategy Preferred Options Document

Question 2:

Please tell us what you think of the Council's preferred vision. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think that the LDF vision responds sufficiently to the following influences:
- The Sustainable Community Strategy;
 - York's issues, challenges and opportunities;
 - The RSS; and
 - Sustainable development, including the UK Sustainable Development Strategy?
- b) Do you consider that the right balance has been struck between these different factors? Do you think that there are other factors that should be considered? (please give details)

General Comments

1. The starting point for the vision should be to ensure that whatever happens in York, it is done in a manner which not only safeguards, but strengthens, the city's unique environment (English Heritage).
2. The vision should emphasise that York is regarded as a "key driver" of the Leeds City Region within RSS (Yorkshire Forward).
3. Support the vision, particularly key references to innovation and to York as a world-class centre for education. The main concern is that these do not get picked up in the 4 key themes and a new Key Theme "A World Class Centre for Education" is proposed.
4. The vision should draw out the interdependent nature of the city's future and past.

5. 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 (Environment Agency).
6. Given that the RSS runs up to 2026 that should be then end date for LDF as well.
7. 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.
8. There is a lack of consideration of infrastructure constraints. Doubt whether York's infrastructure can deal with vision of future economic growth and projections of housing needs. It is important that the Vision is underpinned by realism.
9. There should be more emphasis on the natural environment within the Core Strategy vision.
10. The vision should refer to the aspiration to create mixed and cohesive neighbourhoods, describing the role of the plan in placemaking rather than purely delivering homes and jobs.
11. Support the vision which reflects the ambitions of RSS (LGYH).

York's Special Historic and Built Environment

1. York's special historic and built environment is the key driver of the Core Strategy (GOYH).
2. It should be made clear that in achieving other objectives, particularly a prosperous and thriving economy, the LDF will seek to ensure that its historic environment will be safeguarded (English Heritage).
3. Given that York is one of only a handful of Areas of Archaeological Importance in the country, archaeology should be more strongly referenced in the Vision.
4. Should be amended to be called 'York's Special Historic, Built and Natural Environment'.

Building Confident, Creative and Inclusive Communities

1. Welcome the concentration of development on the main urban area, including the significant contribution from York Northwest.
2. Support the LDF in making provision for at least the level of homes set out in RSS up to 2026 and for rolling forward the RSS housing figure to the end of the plan period. Conversely it was suggested that the RSS is far too demanding and it would be damaging to the environment, transport infrastructure, the historic environment, and social cohesion to continue with its proposed levels of growth.
3. Ambitions of all educational institutions in city need to be recognised and supported, including ongoing development of York College.
4. The vision should recognise the need for development in outer villages to enable thriving sustainable communities.
5. Concern that the urban extensions beyond those identified could be opened up for development.

A Prosperous and Thriving Economy

1. The vision should link providing sufficient land for employment to locations appropriate to the city's historic development (York Civic Trust).
2. The vision needs to expand on links between tourism and the historic city (GOYH).
3. Universities are important to the economy because of links with Science City and there is a need to retain a graduate workforce (GOYH).
4. The LDF should seek to achieve 37% market share, to strengthen York's position in the retail hierarchy, reduce leakage of trade and facilitate sustainability.
5. Resisting comparison goods retail development outside city centre and York Northwest, does not respond appropriately to York's issues, challenges and opportunities.
6. Increasing the 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 the character of city's retail offer.
7. A declining retail market share does not imply a decline in the viability of the city centre. The development of Castle Piccadilly to address this issue will waste an opportunity to regenerate this area for wider public benefit.
8. Drawing in shoppers from outside and encouraging unsustainable consumption will have a detrimental impact on the historic core of the city.
9. 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.
10. 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.

A Leading Environmentally Friendly City

1. Support for the desire 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 (Yorkshire Water).
2. Support for the need to create a permanent Green Belt for York that will endure until at least 2030 or beyond, suggestions included to 2050.
3. The aim to create a permanent Green Belt to 2030 needs to be balanced with the aims of creating "a prosperous and thriving economy" and "building confident, creative and inclusive communities". There should be a greater degree of flexibility to allow for future change and growth.
4. Green Belt should be presented as a positive concept, not negative, it gives open space within the ring road and beyond the ring road protecting the green setting of York.
5. Why is it necessary to exceed renewable energy targets in RSS? The primary way to tackle climate change is to reduce CO2 emissions including reduced energy consumption.
6. Opportunities must be taken to mitigate the effects of climate change on the city. This means protecting gardens for growing food, more

- allotments, investing in Newgate Market, and improving energy efficiency of the existing housing stock as well as new.
7. Parts of LDF aim to conserve natural resources and enhance the local environment, but these are outweighed by continued adherence to excessive economic growth.
 8. We need a vision that promotes architectural and urban design excellence and excellent public spaces to assist the economic image of the city.
 9. Transport infrastructure should be one of the main drivers of the spatial strategy and not retro-fitted. (GOYH)
 10. The current approach to transport is not forward thinking enough. Easy access is vital for businesses.
 11. There is a need for us to live within environmental limits which is particularly important in light of the peak oil crisis.
 12. Air quality is not adequately addressed at a strategic level. Development on the scale discussed in the LDF should consider overall impact on pollution and air quality.

9. Spatial Strategy

Planning York's Future Questionnaire

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:

Question 6a: Protecting areas that preserve York's historic character and setting. Do you think that this is appropriate?

- 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.

Question 6b: Protecting York's green infrastructure including green corridors and nature conservation sites. Do you think that this is appropriate?

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

Question 6c: Minimising Flood Risk. Do you think that this is appropriate?

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

Question 6d: What other issues do you think we should consider?

- 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.

Question 8: 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? If no, which other areas would be more suitable?

- 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. Half of these did not suggest an alternative, of those that did the main areas identified were:
 - Area E
 - Area F
 - Area D
 - Brownfield sites only

Question 9: 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? If no, which other areas would be more suitable?

- 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.
- 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

Core Strategy Preferred Options Document

Question 3:

Please tell us what you think of the Council's preferred approach to the spatial strategy. Please feel free to give any comments you consider appropriate but in particular:

- a) Do you think it is appropriate to identify land for development in the draft Green Belt for housing and employment?

- b) we would appreciate comments on whether the proposed spatial principles are 'fit for purpose'. Further information can be found in Topic Paper 1 'Approach to the Spatial Strategy'.
- c) 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? If not, which other areas would be more suitable?
- d) 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? Are there any other areas that would be suitable?

General

1. It is important to show a clear audit trail of how alternatives were considered prior to arriving at the preferred options of urban extensions A, B, C and I (GOYH).
2. The section should set out more clearly how the strategic objectives flow from the vision and Regional Spatial Strategy (GOYH).
3. The strategy needs to set out what elements contribute to the special historic character and setting of York and use this to determine the extent to which the areas of search, levels of growth, proposed densities and role in the region might impact upon the character and setting of the City (English Heritage).
4. The levels of growth cannot be supported and therefore the preferred approach to accommodating such growth cannot be supported.

Regional Role

1. York should not be considered as part of Leeds City Region and should not be seen as the economic driver for the sub-region.
2. The extent of York's sub-regional centre should be limited to the city centre and not extended to the remainder of the city. It is the city centre which forms the regionally significant centre and it is not appropriate for less sustainable suburbs to be afforded the same status.

3a) The Appropriateness of Identifying Land in the Green Belt for Development

1. The strategy will establish a long-term green belt boundary which responds to a better understanding of York's special character and sense of place (English Heritage and GOYH).
2. The release of draft Green Belt land is required to create a new layer of development that is valued as much as the existing ones and to meet the RSS housing requirements.
3. It is neither necessary nor desirable to expand York, given the extent of brownfield development land available and the potential impact on the character of York.

3b) Spatial Principles

SP1 - Settlement Hierarchy

1. York is an appropriate focus for the majority of growth, although not all places within York itself should be treated equally.
2. Parts of York are so well served by neighbourhood facilities that they should be reclassified as centres in their own right e.g. Monks Cross.

3. There is significant disagreement over the future role of villages within City of York's authority, and the levels and types of growth apportioned to them with some supporting growth in the villages and others opposing it.
4. The strategy should set out more explicitly the need for urban extensions.
5. The strategy should set out how much growth would be apportioned to each 'place' in York, and recognise that not all places within the same tier should be expected to provide for the same levels of growth.

SP2 - Areas of Constraint

1. The policy should be more positively framed as the identification of site assessment criteria to help achieve sustainable growth rather than constraint led.
2. Constraints should be applied to each individual site, rather than as absolutes, to weigh up the merits of one site against another.
3. The approach may create two-tier protection, where land outside the constraints layer is considered less important or dispensable.
4. The approach should reflect the historic pattern of growth where development expands along linear corridors and villages coalesce with the urban core.
5. There is disagreement as to whether the outer ring road should form a constraint. Some see it as a way of concentrating development on York, reinforcing its urban core, whilst others felt that using it as a constraint is not reflective of the character of the settlement patterns of the past. Furthermore, concentrating development within the ring road would lead to town cramming and prejudice principles such as preserving York's historic character. It would also lead to the loss of green belt adjacent to the urban edge which plays an important role.
6. The constraints should include fluvial and pluvial flooding, as well as risk from surface water flooding.
7. Support the precautionary approach to flood risk (Environment Agency).
8. The approach should consider additional constraints including agricultural land quality; amenity and noise issues; emissions; contamination and the need to meet green infrastructure standards (includes Natural England).

SP3 - Approach to Future Development

1. Support the focus on previously developed land, and the recognition of the role of major development opportunities to help deliver the strategy (Yorkshire Forward).
2. Should area A&B be considered as strategic sites as there is a strong likelihood they will be needed to meet housing needs (LGYH)?
3. The approach is over-reliant on large strategic sites and may be better delivered through a rolling programme of smaller dispersed developments.
4. It is inappropriate to discuss the release of green belt land before the SHLAA is complete.
5. The approach should allow for greenfield land to be considered before brownfield where it provides for more sustainable solutions, which help achieve other aims of the Plan (includes Yorkshire Forward).

6. The sequential approach should be applied within each tier of the settlement hierarchy rather than greenfield land releases being reliant on a lack of available brownfield land within other settlements.
7. The sequential approach should not ignore development that will be necessary to enable other settlements to fulfil their roles (LGYH).
8. The approach should consider development on rural brownfield sites.
9. The Spatial Strategy should be driven by the visions of individual settlements and the approach to meeting their needs and opportunities (LGYH).
10. A distinction should be made between the level of Local Service Centres and Villages in the sequential approach (LGYH).

3c) and 3d) – Future Approach to Land for Housing and Employment Growth

1. Support the release of land at A and B for housing development (in the main, this reflects the views of the development industry).
2. The strategy should only consider brownfield sites for development.
3. The strategy should bring forward employment development in early years (supporting existing business park), followed with mixed use, and then residential development towards the end of the plan period.
4. Site I is in a remote location and should not be considered for employment.
5. How can peripheral development on the north-eastern and eastern sides of York be reconciled with Policy CS1 that states that "areas ... which provide an impression of a historic city situated within a rural setting" should continue to remain open in order to safeguard special character of York (English Heritage)?
6. Area A should be reconsidered in light of the comments of the Green Belt Local Plan Inspector concerning important views from the ring road (English Heritage).
7. Identifying areas A and B as potential housing sites in the long-term could give developers the green light to bring them forward earlier than expected in the plan period.
8. The strategy should release additional land over and above that identified in the preferred approach, since A+B alone will not provide sufficient housing land to meet projected levels of need. This could allow for lower densities in the urban area which would reduce the impact on the character of the historic city.
9. Parts of Area A should be brought forward in the early years, before 2021.
10. There is a mixed response to the potential for employment development at areas C (Hull Road) and I (Northminster Business Park). Further evidence is needed on how it fits with the wider strategy (LGYH).
11. The approach should set out more explicitly the role that A&B will have in fulfilling the strategic role of York as part of the Leeds City Region and how they fit with planned transport investments (LGYH).
12. Other areas suggested as alternatives are set out below.

Spatial Strategy Alternative Areas of Search

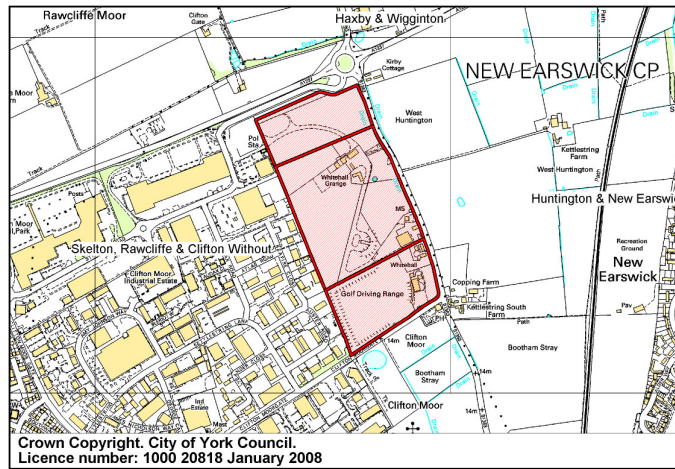
The following sets out the areas which respondents felt should be included in the spatial strategy either instead of, or in addition to, the preferred areas of search A, B, C and I. A number of respondents to the questionnaire also suggested alternative areas of search and these are outlined at the start of Section 9.

Only areas which are considered to be strategic in nature have been included. For the purposes of this summary we have used a threshold of 10ha however the size of a strategic site still needs to be decided and we would normally consider a strategic site to be larger than 10ha. It also only includes areas which could be clearly identified from the information that was submitted. For example, if the respondent:

- submitted a plan showing the area they were referring to;
- referred to one of the long list of areas of search from Topic Paper 1; or
- specifically referred to sites previously submitted as part of the Allocations DPD Issues and Options consultation.

Land at Whitehall Grange, Clifton Moor

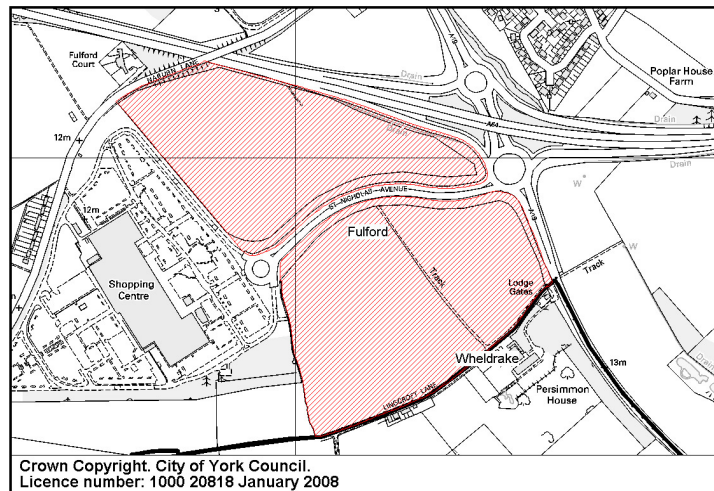
Raymond Barnes: ref 172



Proposed Use
Employment

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

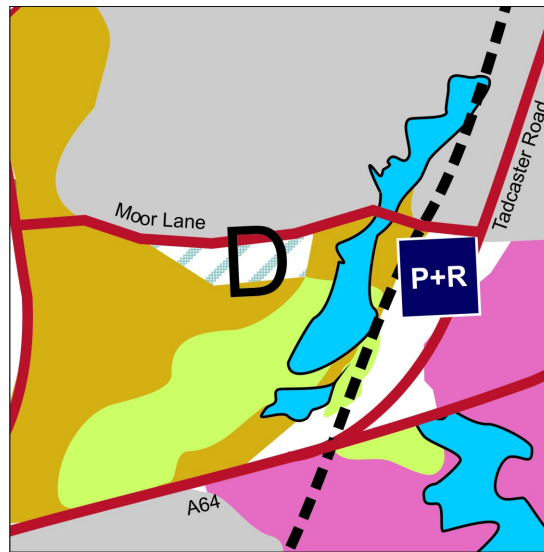
Dobbies Garden Centres PLC: ref 2507, Land and Development Practice: ref 568/476



Proposed Use
Employment

Area of Search D, South of Moor Lane

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

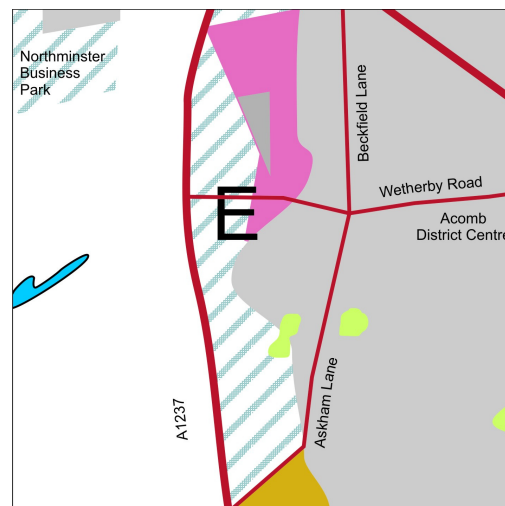


Proposed Use

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

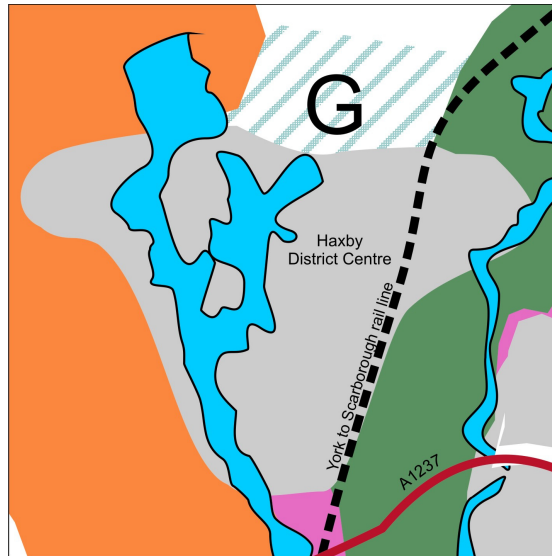


Proposed Use

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

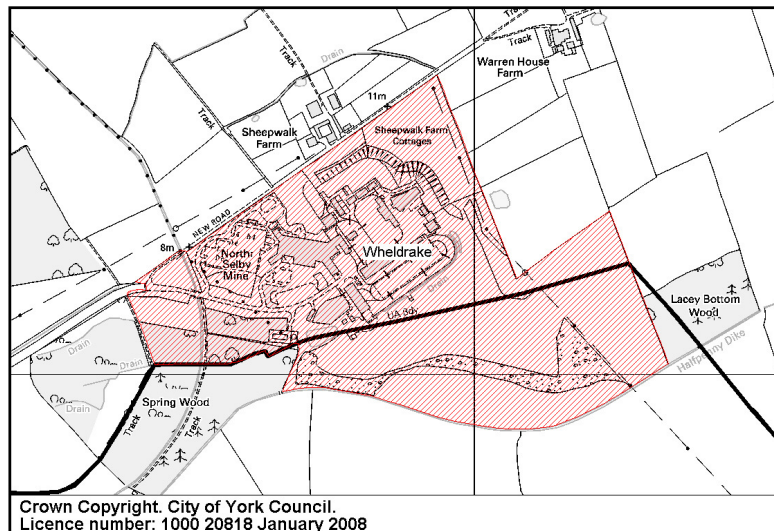


Proposed Use

Residential

North Selby Mine

UK Coal Mining Ltd: ref 515

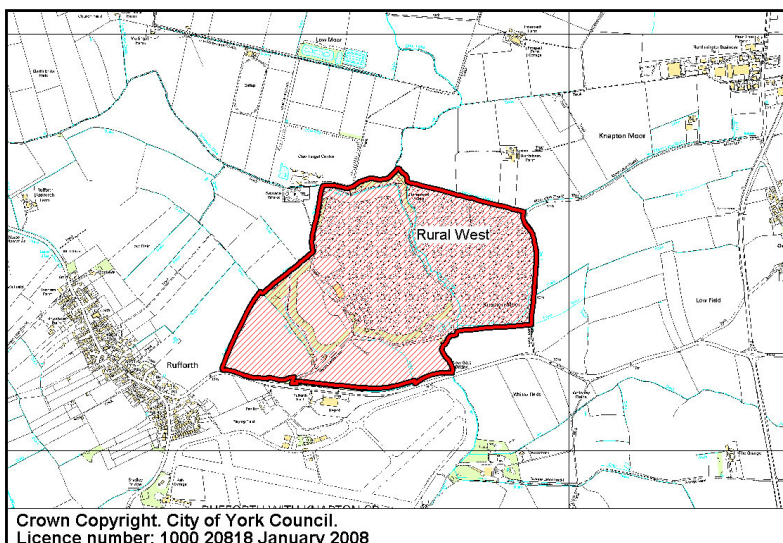


Proposed Use

Renewable Energy 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)

Area/Description	Proposed Use	Respondent
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)
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)

Site/Area	Size	Proposed Use	Respondent
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)