

# **Heslington Parish Neighbourhood Plan**


## **CONSULTATION STATEMENT**

### **Appendix 3: Pre-Submission Consultation Consultee responses**

**September 2019**

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
HVT	I write on behalf of the Heslington Village Trust to give the Trust's full support to the proposed Neighbourhood Plan as set out in the consultation document. In building on the success of the Heslington Village Design Statement, which it will supersede, the Plan will allow for appropriate development of the village. It will also allow for the development of the university that forms a significant part of the parish, while ensuring that the environmental character and qualities of the village and parish are preserved and protected for the benefit of all residents and businesses.	Email	Gen		The support for the plan is welcomed.	No change
	The HESLINGTON MEETING ROOM COMMITTEE have studied the draft Neighbourhood Plan in detail and fully endorse its aims and policies.	Resident form	Gen		The support for the plan is welcomed.	No change.
BP	I represent the owners of the Langwith Garden Village site, currently in the Local Plan as ST15. As you would expect, we will be submitting representations to the Heslington Neighbourhood plan process, but I wondered if you would like a meeting so that we can explain our position and further background to the site and how it could impact on the Neighbourhood Plan? If this is of interest please let me know and we can arrange a meeting, or attend one of your scheduled meetings. <a href="http://royalpilgrim.com/">http://royalpilgrim.com/</a>	Email	Gen		See also: <a href="http://www.landscapeagency.co.uk/new-garden-village/">http://www.landscapeagency.co.uk/new-garden-village/</a> . A response has been sent acknowledging the email.	No change.
HSMC	<b>Heslington Parish Neighbourhood Plan</b> <b>Comment by Heslington Sportsfield Management Committee.</b> Heslington Sportsfield is a registered charity- No. 523247 The Heslington Sportsfield management Committee [HSMC] comprises a group of volunteers representing Heslington residents and the football and cricket clubs who use the field. Under their management the Sportsfield is in regular year-round use by a large number of local sportsmen as well as the regular casual users of the play equipment. Heslington Cricket Club have a growing junior section covering under 9, 11 and 13 learning the game. There are currently two senior teams playing Saturday cricket as well as a midweek team playing on Wednesdays in the Foss League. In 2019 they will be fielding a 3rd	Email	Gr	s12	<b>Key</b> Bu - Business Employment and Local Facilities Ag -Agricultural and rural Enterprise Ur - Urban design and Character Ho - Housing Gr - Local Green Environment Tm - Transport and Movement Un - University of York Tr - Traffic-current issues Co - Conservation area Gen - General	

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	<p>team playing home fixtures on Sunday afternoons. This team will be a Development side for junior players making the transition to senior cricket. For the juniors they will also be running the All Stars programme for U7 on Sunday mornings. Heslington Football Club have one team playing on Saturdays. Fulford Football Club is a FA Charter Standard Community Club with 28 teams this season. The club has 356 playing members with 37 seniors and 239 girls and boys in their junior section who play weekly at the Outgang on Saturdays and Sundays. HSMC are pleased to note that under policy HES: 9 there is encouragement for recreational facilities and green spaces to encourage healthy lifestyles. They are also pleased to note that the Heslington Village Sportsfield is recognised under paragraph 12.3 - 10 as an important local amenity (with football and cricket pitches, children's play area and pavilion).</p> <p>We note that under Policy HES: 11 "small size ancillary development will be permitted" provided that it meets certain criteria. The Sportsfield at present is well used and there are occasions where the current availability of parking for participants is very inadequate and if the opportunity occurs for an expansion of parking facilities adjacent to the Sportsfield the committee would like to use such an opportunity. The HSMC suggest that the interpretation of HES: 11 should also include the possibility of a discreet additional parking area dedicated to Sportsfield use and possibly on the field to the south of the existing playing field. Signed HSMC 7.03.2019</p>				<p>The support for the plan is welcomed.</p> <p>The Heslington Parish Neighbourhood Plan (HPNP) does not support conversion of local community designated green open space for parking. Allocation of land south of the playing field for parking is not within the remit of this Plan.</p>	<p>No change.</p> <p>No change.</p>
EPC	We continue to object to the current proposed location of ST15 (the Whinthorpe development of 3,339 houses). Clerk to Elvington Parish Council	Postal	Gen		Noted. The HPNP does not allocate sites for strategic development.	No change.
CA	<p><b>Heslington Parish Neighbourhood Plan</b></p> <p>Thank you for the notification of the 24 January 2019 consulting The Coal Authority on the above NDP. The Coal Authority is a non-departmental</p>	Email	Gen		It is noted that the Neighbourhood Plan area does not contain	No change.

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	public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing. As you will be aware the Neighbourhood Plan area lies within the current defined deep coalfield. However the Neighbourhood Plan area does not contain any surface coal resources or recorded risks from past coal mining activity at shallow depth. On this basis the Coal Authority has <b>no specific comments</b> to make on your Neighbourhood Plan. In the spirit of ensuring efficiency of resources and proportionality it will not be necessary for you to provide The Coal Authority with any future drafts or updates to the emerging Neighbourhood Plan. This letter can be used as evidence for the legal and procedural consultation requirements. The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan. <b>Melanie Lindsley Development Team Leader</b>				any surface coal resources or recorded risks from past coal mining activity at shallow depth. It is also noted that further updates are not required.	
FPC	At the meeting of Fulford Parish Council on 12 <sup>th</sup> March, the Parish Council asked me to forward their congratulations to you on producing an excellent Neighbourhood Plan and they expressed their hope that it will pass on towards adoption. Rachel Robinson, <b>Clerk and RFO to Fulford Parish Council</b>	Email	Gen		The support for the plan is welcomed.	No change.
EA	 <p><b>PRE-SUBMISSION CONSULTATION RESPONSE - (9 APRIL 2019)</b> Please find our comments below for Heslington neighbourhood Plan. Thank you for consulting the Environment Agency regarding the above mentioned proposed draft plan. We have reviewed the information submitted and we wish to make the following comments</p> <p><b><u>Strategic Environmental Assessment</u></b> We note that the Council has a responsibility to advise the Parish Council if there is a need for formal Strategic Environmental</p>					

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	<p>Assessment of the draft Neighbourhood Plan. You are seeking our views in order to inform the Council's decision on this matter. We have considered the draft plan and its policies against those environmental characteristics of the area that fall within our remit and area of interest.</p> <p>Having considered the nature of the policies in the Plan, we consider that it is unlikely that significant negative impacts on environmental characteristics that fall within our remit and interest will result through the implementation of the plan.</p> <p><b><u>Draft Plan</u></b> We have no objections to the draft plan. We are pleased to see a policy on the Environment (3.5) and it has good positive points to support Biodiversity.</p> <p><b><u>Site Allocations</u></b> We note that this area plan is allocating sites, but as these are already within the local plan and we will have previously commented on these, we have no further comments to make on these.</p> <p><b><u>Flood Risk</u></b> I note that the area has is showing to have areas to be a risk of flood (within Flood Zone 2.3). We would like to see flood risk policies and that minimising the impact of flooding referred to in an 'Environmental' section. This is a key sustainability issue and will be exacerbated in in the future due to climate change. In terms of both policy and site selection, flood risk should be a major consideration in your plan. In drafting your flood risk policy, you should:</p> <ul style="list-style-type: none"> <li>• Emphasise that inappropriate development will not be considered acceptable in areas of high flood risk.</li> <li>• Highlight, where necessary, the need to undertake the sequential and exception tests.</li> </ul>				<p>EA "<i>consider that it is unlikely that significant negative impacts on environmental characteristics... will result through the implementation of the plan.</i>"</p> <p>The support for the plan is welcomed.</p> <p><b>The HPNP does not allocate any sites for development.</b></p> <p>Risk of flood is not considered significant in the Parish and is covered in Section 5. Impact on flood risk and related matters for strategic site allocations are covered within the York Draft Local Plan.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>


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	<ul style="list-style-type: none"> <li>Promote a sequential approach to development layout, to ensure the highest vulnerability development is located in areas at lowest flood risk.</li> <li>Address the potential impacts of climate change on flood risk.</li> <li>Describe what is expected of developers in terms of surface water run-off rates (for both brownfield and Greenfield sites) and sustainable drainage systems.</li> <li>Where possible, expect development to result in a betterment to the existing flood risk situation.</li> <li>Ensure that new development does not increase flood risk to others</li> </ul> <p>A sequential approach to flood risk will also need to be taken when allocating sites.</p> <p>New development proposals should be encouraged to contribute either financially or through physical works to reduce the flood risk to the wider village. This would require a clear understanding of what the flood risk reduction strategy is. This should be reflected in this section/policy.</p> <p><b><u>Surface Water</u></b></p> <p>The Lead Local Flood Authority is now the responsible authority for commenting on the surface water drainage arrangements. We therefore recommend you consult your LLFA regarding the proposed management of surface water within the Plan.</p> <p><b><u>Planning for Climate</u></b></p> <p>We suggest that you look into climate change issues that may affect the area as this has not been taken into account in your policies.</p> <p><a href="https://www.gov.uk/search?q=climate+change&amp;filter_organisations%5B%5D=environment-agency">https://www.gov.uk/search?q=climate+change&amp;filter_organisations%5B%5D=environment-agency</a></p>				<p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p>









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	<p>Applicants should remove watercourses from existing culverts where this is feasible. This will help to reduce flood risk from blocked or collapsed culverts, and open channels are significantly easier for the landowner to maintain. Culverts that cause blockages of the watercourse are the responsibility of the owner to repair. Additionally, we will usually object to planning applications that propose new culverts.</p> <p>Your plan policy should also provide details of 'buffer zones' that are left adjacent to watercourses. We will always ask developers to maintain an undeveloped, Naturalised, 8 metre buffer zone adjacent to main rivers. We ask that applicants do not include any structures such as fencing or footpaths within the buffer zone as this could increase flood risk - through the inclusion of close-board fencing for example. Any works or structures that applicants intend within 8m of a main river will require a flood defence consent from us, which is separate from and in addition to any planning permission granted.</p> <p><b><u>Sustainable construction</u></b></p> <p>You could also help your community save money through sustainable construction. Neighbourhood planning is an opportunity for communities to encouraging efficient water and waste management systems in new buildings, and use locally sourced wood fuel for heating. You could also help to promote the use of sustainable materials in construction, and encourage energy efficiency measures for new builds. These measures will reduce the cost of construction for developers and help to reduce utility bills for those using the building. This will also help the environment by reducing emissions and improving air quality.</p> <p>We hope this response helps you develop your plan.  <b>Claire Dennison, Sustainable Places Planning Advisor</b>  Email: <a href="mailto:Claire.Dennison@environment-agency.gov.uk">Claire.Dennison@environment-agency.gov.uk</a></p>				<p>Noted.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p>

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HE SEA	 Historic England YORKSHIRE  <p>Our ref:PL00539328 11 March 2019</p> <p><b>Heslington Neighbourhood Plan: Strategic Environmental Assessment Screening Opinion Consultation</b></p> <p>We write in response to your e-mail of Thursday 24 January 2019, seeking a Screening Opinion for the Heslington Neighbourhood Plan Preferred Options draft. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it likely to have a significant effect on the environment?" in respect to our area of concern, cultural heritage. Our comments are based on the information supplied within the Heslington Neighbourhood Plan Preferred Options draft and associated documents. The Heslington Neighbourhood Plan area is situated on the southern edge of York's urban area and contains 2 grade II* and 30 grade II listed buildings, 1 Registered Historic Landscape, 1 Scheduled Monument and Heslington Conservation Area. It will also have a number of locally important buildings, sites, areas and landscapes. Much of the Neighbourhood Plan area falls within York's Green Belt.</p> <p>On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex 11 of 'SEA' Directive], Historic England concurs with the conclusion of the Heslington Neighbourhood Plan SEA Screening Report, set out on pg. 21, para. 7.1, that the preparation of a Strategic Environmental Assessment is <u>not</u> required.</p> <p>The views of the other three statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made. We should like to stress that this opinion is based on the</p>	Email	SEA		<p>Correction made to references to number of listed building and structures</p> <p>It is noted that the preparation of a full Strategic Environmental Assessment is NOT required.</p>	<p>HPNP text amended so to reflect HE response i.e. 32 buildings/structures.</p> <p>No change.</p>


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	<p>information available in the Heslington Neighbourhood Plan Pre-submission draft attached to your e-mail. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.</p> <p>We would be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>Historic England strongly advises that the conservation and archaeological staff of the York City Council are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets. We look forward to receiving an invitation to comment upon the Heslington Neighbourhood Plan Submission in due course. Thank you in anticipation. Yours sincerely</p> <p><b>Craig Broadwith Historic Places Adviser.</b>  <b>E: Craig.Broadwith@HistoricEngland.org.uk</b></p>				A copy of the determination as required by Reg. 11 of the Environmental Assessment of Plans and Programmes Regulations 2004 is requested.	<p>Reg. 11 notification to statutory bodies of the determination of the screening process has been made.</p> <p>I.e. there is not likely to be significant (adverse) environmental effects.</p>
HE	 <p>Historic England YORKSHIRE</p> <p>Our ref:PL00539328 11 March 2019</p> <p><b>Heslington Neighbourhood Plan Pre-submission consultation response</b></p> <p>Thank you for consulting Historic England in connection with the Pre-submission draft Heslington Neighbourhood Plan. The Heslington Neighbourhood Plan area is situated on the southern edge of York's urban</p>	Email	Gen			

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	<p>area and contains 2 grade II* and 30 grade II listed buildings, 1 Registered Historic Landscape, 1 Scheduled Monument and Heslington Conservation Area. It will also have a number of locally important buildings, sites, areas and landscapes. Much of the Neighbourhood Plan area falls within York's Green Belt.</p> <p>We would like to advise that we do have concerns with aspects of the draft Neighbourhood Plan, particularly in relation to the Plans response to new development impacting on the Green Belt which falls within the Neighbourhood Plan Area. The primary purpose of the York Green Belt is to safeguard the special character and setting of the historic city, a development in the Green Belt, therefore, has the potential to impact upon elements which contribute towards the significance of York. You may be aware that Historic England has already raised this matter with York City Council, as follows:</p> <p><i>"We have particular concerns about the area identified for the future expansion of the University and consider that further consideration needs to be had as to how the growth of this important institution might delivered in a manner which best safeguards the elements which contribute to the setting of this important historic City.</i></p> <p><i>Notwithstanding the caveats within the Planning Principles (set out in the Publication Draft of the City of York Local Plan), regarding the limits on the development footprint of any new development at Campus East and for an "appropriately landscaped buffer between the site and the A64", this proposal could harm two elements which contribute to the special character of the historic City.</i></p> <p><i>Firstly, this area is prominent in views from the A64. The expansion of the University to the extent of the area identified would bring development very close to the Ring Road. This will fundamentally change the relationship which the southern edge of York has with the countryside to its south. It will also alter people's perceptions when travelling along this route about the setting of the City within an area of open countryside.</i></p>		Gr		<p>At present, York does not have an adopted Local Plan. In the meantime it is necessary for the Neighbourhood Plan to be in general conformity with the strategic policies of the development plan. Within this context the appropriate strategic Green Belt policies are the saved policies of the otherwise revoked Yorkshire and Humber Plan Regional Spatial Strategy (2008) (the RSS).</p> <p>Until a Local Plan for York is adopted, development management decisions relating to proposals falling within the general extent of the Green Belt have and</p>	<p>No change.</p> <p>Based on prior Examiner comments, CYC recommend neighbourhood plans continue to apply the approach to the identification of the Green Belt as set out currently in the RSS and the Fourth Set of Changes Development Control Local Plan (2005) on an interim basis until such times as the emerging Local Plan is adopted.</p>

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	<p>Moreover, it is by no means certain that the requirement for on "appropriately landscaped buffer" between the site and the A64, will not, itself, further harm the openness of the Green Belt in this location. Previous landscaping schemes by the University in this part of the City have simply resulted in earth bunding: an alien features in the flat landscape to the south of the City.</p> <p>Secondly, the expansion of the university towards the ring road could also harm the relationship which the historic city of York has to the surrounding villages - another element identified in the Heritage Topic Paper as contributing to the special character of York. This relationship relates to not simply the distance between the settlements but also the size of the villages themselves, and the fact that they are free-standing, clearly definable settlements. The expansion of the University would effectively reduce the gap between the edge of the built up area of the City and this proposed new settlement west of Elvington Lane (Site ST15) to 1.6km.</p> <p><u>Recommendation</u></p> <p>The future expansion of the University should be restricted to within the Campus East and consideration should be given to the expansion of the university in a northerly direction onto Site ST4 instead."</p> <p>In the context of our advice and recommendation to York City Council, we have therefore provided a detailed schedule of comments and recommendations upon the Submission Draft Neighbourhood Plan policies in the attached Appendix, which we would advise you to incorporate into the revised draft of the Heslington Neighbourhood Plan, following the end of the Pre-submission Draft consultation period. We look forward to being consulted upon the Submission Draft of the Heslington Neighbourhood Plan by York City Council in due course. If you have any queries about the content of this letter, please do not hesitate to contact me. Yours sincerely</p> <p><b>Craig Broadwith Historic Places Adviser.</b></p> <p><b>E: Craig.Broadwith@HistoricEngland.org.uk</b></p>				<p>will be made on the basis that the land in question should be treated as Green Belt.</p> <p>The detailed comments from HE relating to the City of York Draft Local Plan are noted. However, it is considered that these matters are outside the remit of the Neighbourhood Plan.</p> <p>The detailed schedule of comments is noted. However as the <b>HPNP does not allocate any sites for development</b>, it is considered that these matters are outside the remit of the Neighbourhood Plan.</p>	<p>No change.</p> <p>No change.</p> <p>Also see separate schedule below.</p>

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NE	 <p>CYC forwarded the response from NE:</p> <p>“The advice is clear - should you allocate sites within the plan (as opposed to shaping policies) Natural England advise that the Neighbourhood Plan is progressed post the adoption of the Local Plan. Natural England in their response advocate an approach that does not allocate development sites and advises the plan should implement Development Management style policies to shape development. If this is the contents of the plan, the response states <u>that it is likely to not need to go forward to either HRA or SEA.</u>”</p>				<p><b>The HPNP does not allocate any sites for development.</b></p> <p>CYC have therefore suggested that the HPNP is currently in accordance with Natural England advice i.e. that the policies would be applied if a development came forward in the plan to shape development but that no sites were actually allocated for development.</p>	<p>HPNP text has been clarified to confirm this position.</p> <p>Therefore, as indicated by NE, the HPNP <u>“is likely to not need to go forward to either HRA or SEA”.</u></p> <p>HRA/SEA updated to include NE and other relevant comments from the Pre-Submission consultation.</p>
YUSU	<p>Please find below the students' union response to the Heslington Neighbourhood Plan: <i>The Students' Union have considered the Heslington Neighbourhood Plan and are confident that the plan has been thoroughly consulted on with student residents as well as permanent residents. The Students' Union support the policies covered in the plan. Policies of particular interest for the students' union are policy 10 student accommodation and policy 13, 14, 15, and 16 regarding transport in the area and policy 17 University of York.</i></p> <p><i>Policy 10 student accommodation; appreciates the need for development on the University campus to accommodate students but also considers</i></p>	Email	Gen		The support for the plan is welcomed.	No change

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	<p><i>how to keep the village of Heslington preserved as a residential community, that students and local people can both enjoy, which the students' union fully supports.</i></p> <p><i>The policy areas 13,14,15 and 16 carefully consider the traffic in the local area and compliment the sustainable transport schemes run by the University of York and the large numbers of people commuting to the University on a daily basis.</i></p> <p><i>The Students' Union would like to thank all those involved in the neighbourhood plan for Heslington and the time and effort taken to consult with students in the area.</i></p> <p><b>Stephanie Pearson, Community Manager. University of York Students' Union (YUSU)</b></p>					

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Gladman	 <p>Gladman House, Alexandria Way Congleton Business Park Congleton, Cheshire CW12 1LB T: 01260 288800 F: 01260 288801 www.gladman.co.uk</p> <p>By email only to: <a href="mailto:Heslingtonncnplan@outlook.com">Heslingtonncnplan@outlook.com</a></p> <p>12<sup>th</sup> March 2019</p> <p>Dear Sir/Madam,</p> <p>This letter provides Gladman's representations in response to the draft version of the Heslington Neighbourhood Plan (HNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy. Gladman has considerable experience in neighbourhood planning, having been involved in the process during the preparation of numerous plans across the country, it is from this experience that these representations are prepared.</p> <p><b>Legal Requirements</b></p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the HNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i>  <i>(d) The making of the order contributes to the achievement of sustainable development.</i>  <i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i>  <i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i>  <i>(g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of part 6 of the Conservation of Habitats and Species Regulations 2017.</i></p> <p><b>Revised National Planning Policy Framework</b></p> <p>On the 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework. The first revision since 2012, it implements 85 reforms announced previously through the Housing White Paper. The Government published a revised version of the 2018 Framework on the 19<sup>th</sup> February 2019. The revision makes a handful of minor changes which provide greater clarity on housing delivery and seeks to respond to issues that have arisen since the publication of the 2018 Framework.</p> <p><small>Directors: D J Gladman BA, K J Gladman MCSP SRP, J M S Shepherd BSc, CEng, MIEE, G K Edwards DipTP, MRTP VAT Registration No. 677 6792 43 Registered Address: Gladman House, Alexandria Way, Congleton Business Park, Congleton, Cheshire, CW12 1LB, Registration No. 3341567</small></p>	Email	Gen			






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	<p>Paragraph 214 of the Framework makes clear that the policies of the previous Framework will apply for the purpose of examining plans where they are submitted on or before 24<sup>th</sup> January 2019. Given the date of this consultation the submission of the HNP will occur after this date, and therefore the comments below reflect the relationship between Neighbourhood Plans and the National Planning Policy Framework adopted in 2019.</p> <p><b>National Planning Policy Framework and Planning Practice Guidance</b></p> <p>The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.</p> <p>At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account of and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p><b>Planning Practice Guidance</b></p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements of the wider area as confirmed in an adopted development plan. The Framework requirements have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11<sup>th</sup> February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p>				Refers to NPPF (2019) revisions.	Based on CYC guidance the HPNP text in the Submission version has been updated to reflect NPPF (2019) guidance.


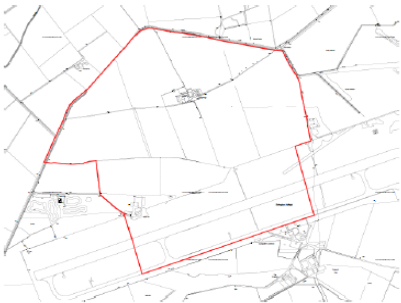
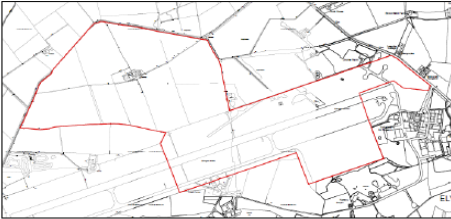
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	<p>On 19<sup>th</sup> May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG, providing clarity on the measures a qualifying body should take to review the contents of a neighbourhood plan where the policy evidence base becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying body's anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded.</p> <p><b>Relationship to Local Plan</b></p> <p>To meet the requirements of the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.</p> <p>The York City Core Strategy Submission 2011, was submitted to the Secretary of State in February 2012, however following the Planning Inspector's Report, which raised concerns regarding the compliance of the Plan with the NPPF, the document was withdrawn by Councillors. Therefore, there is currently no adopted Local Plan against which the Heslington Neighbourhood Plan will be tested.</p> <p>To meet the requirements of the Framework, the Council has commenced work on new Local Plan. The new City of York Local Plan was submitted to the Secretary of State for Housing, Communities and Local Government on Friday 25<sup>th</sup> May 2018. Hearing sessions are yet to be confirmed by the Inspector.</p> <p>As such, given that the Plan is still in the process of being examined, there remains considerable uncertainty over what level of development that the Heslington Neighbourhood Plan Area may need to accommodate to assist the Council in meeting its housing needs. Accordingly, the Plan will need to ensure that it allows for sufficient flexibility to ensure that it is able to react to changes that may arise through the emerging Local Plan Examination</p> <p><b>Heslington Neighbourhood Plan</b></p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the HNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.</p> <p><b>Policy HES 4: Sustainable Design</b></p> <p>Policy HES 4 states that new development will be supported where high quality design is incorporated. A list of 8 design criteria are specific within the policy text.</p> <p>Whilst Gladman recognise the importance of high-quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles.</p>				<p>The HPNP does not allocate or designate land or specific locations for strategic site development.</p> <p>These matters have been previously considered during the independent examination of other City of York area Neighbourhood Plans. E.g. Rwk NP. Adopted 20 Dec 18.</p> <p>Gladman considers some policies do not reflect the requirements of national policy and guidance. Policy HES: 4 is considered as overly prescriptive and needs flexibility in order for schemes to respond to sites specifics.</p>	<p>No change.</p> <p>HPNP text amended to reference NPPF (2109) para 126f: <i>"... However, their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified."</i></p>

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
	<p>Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 126 of the NPPF 2019 which states that: <i>"To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high-quality standard of design. However, their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified."</i></p> <p><b>Policy HES: 8 Housing Mix and Affordability</b></p> <p>Policy HES 8 states that development will be permitted if it includes a balanced mix of house types to meet local need.</p> <p>Gladman would like to take this opportunity to politely remind the Parish Council that it is not within their remit to determine planning applications, and as such, we suggest that the word 'permitted' is replaced with 'supported' in the policy.</p> <p><b>Policy HES: 11 Local Green Space</b></p> <p>Policy HES 11 identifies 11 parcels of land that are proposed for designation as Local Green Space.</p> <p>Gladman have been unable to locate any specific evidence that would support the allocation of these parcels of land as Local Green Space. We consider that it is essential that a robust evidence base is produced and made publicly available for review and comment.</p> <p>The designation of land as LGS is a significant policy designation and effectively means that once designated, they provide protection that is comparable to that of Green Belt land. As such, the Parish Council should ensure that the proposed designations are capable of meeting the requirements of national policy if they consider it necessary to seek LGS designation.</p> <p>The Framework is explicit in stating at paragraph 77 that 'Local Green Space designation will not be appropriate for most green areas or open space'. With this in mind, it is imperative that the plan makers can clearly demonstrate that the requirements for LGS designation are met. The designation of LGS should only be used:</p> <ul style="list-style-type: none"> <li>• Where the green space is in reasonably close proximity to the community it serves;</li> <li>• Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>• Where the green area concerned is local in character and is not an extensive tract of land.</li> </ul> <p>The issues surrounding LGS designations have been considered in a number of other Examiner's reports across the country and we highlight the following decisions:</p> <ul style="list-style-type: none"> <li>- The Seldlescombe Neighbourhood Plan Examiner's Report recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.</li> </ul>		Ho	HES: 8	Noted.	HPNP policy text amended in line with Gladman recommendation to read "...will be supported where..."
			Gr	HES: 11	Rationale and evidence for designation of LGS is included within section 12 and 13.	<p>HPNP text updated in line with NPPF 2019 para. 100.</p> <p>Additional LGS Appendix 1 to Basic Conditions Statement now included to further evidence and clarify the basis for designation.</p>


REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
	<ul style="list-style-type: none"> <li>- The Oakley and Deane Neighbourhood Plan Examiners Report recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation.</li> <li>- The Alrewas Neighbourhood Plan Examiner's Report identifies that both sites proposed as LGS in the neighbourhood plan 'in relation to the overall size of the Alrewas Village' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.</li> <li>- The Freshford and Limpley Neighbourhood Plan Examiner's Report identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of an extensive tract of land. The Examiner also considered that the protection of fields to 'prevent agglomeration between the settlement areas... is not the purpose of Local Green Space designation'.</li> <li>- The Eastington Neighbourhood Plan Examiner's Report recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance and significance to the local community.</li> <li>- The Tattenhill and Rangemore Neighbourhood Plan Examiner's Report recommended the deletion of 2 LGS comprising of 4.3ha and 9.4ha.</li> <li>- The Norley Examiner's Report identified a total of 13 parcels of land to be designated as LGS. The Examiner recommended at §4.98 that the identification of these extensive tracts of agricultural land was contrary to NPPF policy and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha – 4.3ha.</li> </ul> <p>In view of the above, Gladman suggest that the Parish Council take the time to produce a robust evidence base to support the proposed LGS allocations.</p> <p><b>Policy HES: 12 Green Environment</b></p> <p>Policy HES 12 states that new development will be supported when it can be demonstrated that no significant harm to a list of ecological assets will result.</p> <p>Paragraph 171 of the Framework 2019 refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. As currently drafted, Gladman do not believe this policy fully aligns with the Framework. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.</p> <p><b>Conclusions</b></p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the HNP as currently proposed with the requirements of national planning policy and the strategic policies for the wider area.</p>		Gr	HES: 12	<p>Gladman do not believe this policy fully aligns fully with Paragraph 171 of the NPPF (2019) framework and suggests policy is revisited.</p> <p><b>NOTE:</b>  <b>Policy was drafted with specific CYC guidance on text to maintain consistency with the York Draft Local Plan.</b></p>	<p>In so far as NPPF (2019) para 171 is relevant, the HPNP text differentiates local (e.g. green wedges) and national (e.g. LDV NNR) elements; and highlights the importance of habitat networks. The HPNP does not allocate land/sites for development.</p>

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						Policy re-titled to <i>Green Infrastructure</i> for consistency.
	<p>Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p> <p>Yours faithfully,</p>  <p>Megan Pashley  <a href="mailto:m.pashley@gladman.co.uk">m.pashley@gladman.co.uk</a>  Gladman</p>					

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	<p>Our ref: Q70385/tw/gl Your ref: Email: Tim.waring@quod.com Date: 12 March 2019</p> <p>Heslington Parish Council c/o the Parish Clerk The Byre Field House Farm Thornton-le-Clay York YO60 7QA</p> <p>By email</p> <p>Dear Sirs</p> <p><b>Heslington Parish Neighbourhood Plan – Consultation (Regulation 14) Representations of behalf of Langwith Development Partnership</b></p> <p>Quod act on behalf of Langwith Development Partnership ('LDP'), who are promoters of a sustainable garden village (Langwith) which falls partly within the Neighbourhood Plan's Designated Area. Consequently, LDP have significant interests in the emerging Heslington Neighbourhood Plan ("HNP").</p> <p>These representations demonstrate that LDP support Heslington Parish Council ('HPC') promotion of the HNP and the benefits of that it can bring in terms of both supporting and managing growth. LDP are especially supportive of the HNP's recognition that "future developments will be welcomed" where they are sympathetic and protect and the character of the area.</p> <p>In order to provide context to the following representations to the HNP, I have set out a summary background to the proposed new garden village of Langwith.</p> <p><b>Background to Langwith</b></p> <p>A new garden village has been promoted southeast of York by City of York Council ('CYC'), since the early stages of the draft York Local Plan. Since 2013, a new settlement has been promoted by the Council on land south of the A64, largely within HPC's administrative area.</p> <p>A new settlement has been promoted in the emerging Local Plan initially on land largely owned by Halifax Estates, and latterly on land owned/controlled by Halifax Estates and Oakgate/Caddick Group. Both parties have come together to form a joint development venture – LDP.</p> <p>LDP have supported the promotion of a new garden village in principle in southeast York, albeit they have raised objections to the latest version of the draft Local Plan. The objections are primarily in respect of the proposed new settlement defined as allocation ST15, on the grounds that the proposed form of the settlement is not appropriate (for a range of environmental and technical reasons) and has not been proven to be viable by CYC.</p> <p></p> <p></p> <p>Quod   Capitol Bond Court Leeds LS1 5SP   0113 245 1243   <a href="http://www.quod.com">www.quod.com</a> Quod Limited. Registered in England at above address No. 7170188.</p>	Email	Gen		<p>Quod set out background to the proposed new garden village of Langwith.</p> <p>Allocation of strategic sites for development in York is determined by the York Draft Local Plan and is not within the remit of this Plan.</p>	<p><b>The HPNP does not allocate any sites for development.</b></p> <p>No change.</p>


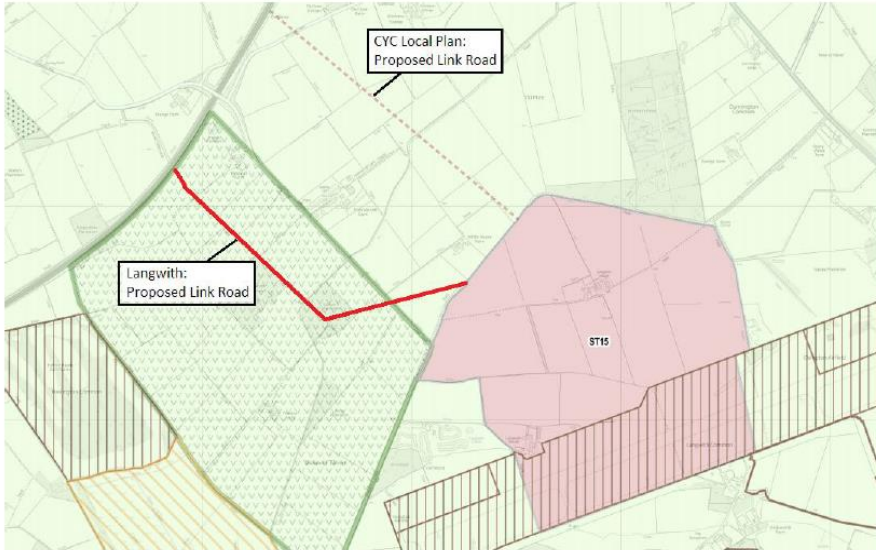
REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p>LDP have promoted an alternative form of development for the allocation, which straddles Heslington and Elvington Parish Council's boundaries. It also involves less development within the HPC's administrative area. A comparison between the ST15 allocation and the proposed Langwith allocation is shown in <b>Figure 1</b> below.</p> <p><b>Figure 1: Boundaries of ST15 and Langwith</b></p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;"> <p>ST15</p>  </div> <div style="text-align: center;"> <p>Langwith</p>  </div> </div> <p>The new garden community proposed in southeast York is one of a range of proposed housing allocations to meet the City's housing needs, including in part those needs in Heslington.</p> <p>It is notable that the HNP aims to deliver growth through a number of means, including the strategic site allocations promoted in the York Local Plan, including ST15.</p> <p>LDP welcome the HNP's support for delivering growth, especially on strategic sites. It is, however, noted at this stage that it would be premature for the HNP to definitively define the strategic allocation ST15 whilst there are outstanding objections to it from the main land owners. The HNP should, therefore, be flexible and recognise that an alternative boundary to the allocation may be found more sound as part of the Examination of the draft York Local Plan. For reasons outlined in these representations, we would hope HPC would find Langwith more meritorious, from a planning perspective, than ST15.</p> <p><b>LDP, therefore, respectfully request that the HNP recognises that the boundary of ST15 may change as part of the York Local Plan Examination.</b></p>		Gen		<p>Quod/LDP request the Plan recognises that the boundary of ST15 may change.</p> <p>HPNP acknowledges York Draft Local Plan development work is ongoing and specifically references York Draft Local Plan – 2018 Policies/Proposal Map South.</p>	<p>No change.</p> <p>No change.</p>





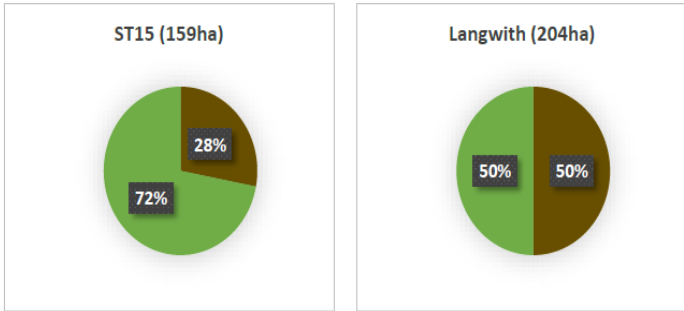
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Quod obo LDP	 <p><b>Travel and Transportation Issues</b></p> <p>It is recognised in the HNP that there is a considerable level of functional interdependence of various areas within the HNP area. Notably at Section 8.4 it is recognised that Heslington Parish, the Village, the Science Park and the University of York ('UoY') are co-dependent.</p> <p>It is also recognised that traffic implications arise from these inter-dependent areas, and any development expansion within the HNP area will need to include measures to control (or reduce) traffic.</p> <p>The inter-dependence of various parts of the Parish will become more broader with the development of a new garden community in the south east of HPC, as well as the proposed expansion of the Elvington Business Park (to the south of the HPC Parish boundary).</p> <p>It is therefore important that the HNP promotes a strategic public transport strategy that will ensure strong linkages between the different parts of the Parish, especially by non-car modes (i.e., public transport, cycle and pedestrian).</p> <p>The importance of exploring synergies between the different parts of Heslington are recognised in the draft York Local Plan, which encourages functional and transport linkages between the UoY, York Science Park ('YSP') and ST15.</p> <p>LDP are promoting high quality public transport links (as well as cycle/pedestrian links) to serve Langwith and integrate it with different parts of Heslington. A diagram of the potential public transport linkage is shown at <b>Figure 2</b>.</p> <p>Alongside this, LDP are also exploring potential synergies with both the UoY and YSP that could benefit the wider public transport access of the both areas.</p> <p>LDP would wish to work with HPC on an appropriate public transport strategy, to ensure that high quality linkages between the various areas of the Parish are established, in an appropriate manner (both technically and environmentally).</p>					
			Tr	s14	Noted. Sustainable Transport policy aims to ensure that new development is supported by a balanced mix of sustainable transport options and does not have an adverse impact on traffic safety and congestion.	No change








REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p>Figure 3: Access Routes to ST15 / Langwith from A64</p>  <p>It can be seen on <b>Figure 3</b> that LDF's proposed link road between Langwith and the A64 is positioned differently to that proposed in the York Local Plan (i.e., it is located further south west). In discussions with Highways England ('HE'), LDP have been advised that the proposed 'Langwith' location shown in <b>Figure 2/3</b> is the only technically feasible option.</p> <p>LDP respectfully request that the HNP is modified to show the alignment of the LDP's proposal at Figure 2.</p>		Tr		<p>HPNP acknowledges that work on the York Draft Local Plan is ongoing and specifically references York Draft Local Plan – 2018 Policies/Proposal Map South and City of York Local Plan - Publication Draft (Regulation 19 Consultation February 2018).</p>	No change.


REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p><b>Housing Delivery in the HNP Area</b></p> <p>The HNP notes (Section 7.2) that the draft York Local includes allocations for approximately 3,500 homes across the Parish boundary, with only 2,411 being in the HNP area. This is explained further in Section 5.1.5, which states that of the total capacity of the ST15 allocation (3,339 homes); only 2,200 homes will be constructed in the Parish. This appears incorrect, as the entirety of the ST15 allocation falls within the Parish (and HNP) boundary.</p> <p>It is, however, the case that the Langwith site boundary falls across both Heslington and Elvington Parish boundaries, and a good proportion of the site falls within Elvington Parish Council. It is estimated that of the total site area (204ha ha) of Langwith, 125ha (61%) falls within Heslington Parish and 79ha (39%) within Elvington Parish. On the other hand, draft allocation ST15 (159ha) falls entirely within Heslington Parish boundary.</p> <p>LDP request clarification on the HNP's assessment of housing delivery within the HNP area, whilst at the same time requesting that the HNP should be flexible in the event that the boundary of the new settlement changes as a result of the Examination of the York Local Plan.</p> <p><b>Green Belt</b></p> <p>The vast majority of the HNP area is within the draft Green Belt (Section 5.3 of the HNP).</p> <p>It is recognised in the draft York Local Plan and supported by the draft HNP, that York's Green Belt needs to be modified within HPC's area, most notably to accommodate some of the housing needs of the City, through the development of a new settlement. LDP's promotion of Langwith will reduce the Green Belt landtake within Heslington PC by c. 45ha compared to that taken up by allocation of ST15 of the York Local Plan.</p> <p>Moreso, LDP's promotion of Langwith involves a significant "brownfield" land take up (i.e., Elvington Airfield), and as a consequence, Langwith has a greater balance of brownfield landtake than draft allocation ST15.</p> <p>The Plans at <b>Figure 4</b> below demonstrate the greenfield/brownfield landtake associated with Langwith and ST15.</p>			5.1.5 7.2 SEA	<p>CITY OF YORK Local Plan - Publication Draft February 2018 (Regulation 19 Consultation) on page 54 states:</p> <p><b>Policy SS13: Land to West of Elvington Lane</b></p> <p>The development of Land West of Elvington Lane (ST15) supports the Local Plan vision in delivering a new sustainable garden village for York. It will deliver approximately 3,339 dwellings, around 2,200 units of which will be delivered within the plan period. Location and boundary definition of ST15 is a York Draft Local Plan matter and not within the remit of this Plan.</p>	<p>HPNP text amended in line with Quod recommendation to:</p> <p><i>The development of Land West of Elvington Lane delivers approximately 3,339 dwellings.</i></p>


REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p>Figure 4: Greenfield:Brownfield Landtake</p>  <p>LDP consider that the Langwith proposals are more appropriate than ST15, in that it protects and enhances the environment and greenspaces moreso than ST15. It, therefore, meets one of the aims of the HNP, which is to protect and enhance the environment and green spaces (Section 7.2).</p> <p><b>Green Spaces and Biodiversity</b></p> <p>The Parish contains areas of ecological significance, including the Heslington Tillmire SSSI, and a large area of farmland.</p> <p>The Langwith proposals aim to protect and enhance the SSSI, through the creation of a Habitat Enhancement Area ('HEA') buffer, on the eastern side of the SSSI, as well as on the western part of the Airfield. This buffer will act as a significant biodiversity resource, and the evidence presented by LDP (available on request) to the York Local Plan consultation demonstrates that there will be considerable biodiversity enhancement arising from this HEA.</p> <p>This HEA, if approved, will provide a substantial natural buffer to the south of Heslington Village, protecting the village from any development in the south of the Parish, most notably that at Langwith. The HEA is shown on <b>Figure 5</b> below:</p>		Ho		Noted. Allocation of strategic sites for development in York is determined by the York Draft Local Plan and is not within the remit of this Plan.	No change.
			Gr		Noted. Definition of the extent of Green Belt boundary is a matter for the York Draft Local Plan.	No change.

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p>Figure 5: Langwith Habitat Enhancement Area</p>  <p>HPC have objected to Policy OS10 of the emerging York Local Plan, which is the alternative to LDP's HEA. HPC's principal concern is the site being taken out of agricultural use, and the prospect of disturbance from people and domestic animals on the adjacent Tillmire SSSI. LDP's proposed HEA, will remove any resultant prospect of disturbance on the SSSI, given it will be managed. This has been supported by Natural England and Yorkshire Wildlife Trust.</p> <p>LDP, therefore, recommend that the area identified above in <b>Figure 5</b> is designated as a local green space, but with managed public access.</p> <p><b>Policy Specific Representations</b></p> <p>In view of the above, LDP wish to make the following comments on specific policies:</p> <p><b>Policy HES:2 – New Business and Employment Development</b></p> <p>This Policy seeks to steer business and employment development to particular areas of the Parish, that the HNP seeks to restrict business and employment development within the strategic sites, including the new settlement, to those which are 'local facilities for the housing'.</p>				<p>Allocation of strategic sites for development in York is determined by the York Draft Local Plan and is not within the remit of this Plan.</p> <p>Gr</p> <p>Quod/LDP request a further land area contained within their alternative proposal to the York Draft Local Plan is designated as Local Green Space.</p>	<p>No change.</p> <p>Allocation of these areas is a matter for the emerging York Draft Local Plan and not within the remit of the HPNP.</p> <p>No change.</p>




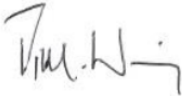
REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p>Whilst it is important to provide local jobs within the new settlement, on the grounds of sustainability, it is not in the interests of York's economy to restrict these businesses to provide employment for only those living in the new housing.</p> <p>LDP, therefore, request that the text <i>'where they comprise local facilities for the new housing'</i> in the second bullet point should be removed.</p> <p><b>Policy HES:3 – Agriculture and Rural Enterprise</b></p> <p>LDP support the HNP's focus on rural enterprise, and the HNP's aim of ensuring that working farms in the Parish are viable, thriving businesses which make a positive contribution to local green infrastructure.</p> <p>There is, however, an inevitable tension between providing new development especially on strategic sites, and the objectives of Policy HES:3, which, for example, would prevent development that compromises farming activities. By way of example, the development of a new settlement, and the necessary HEA, would take place in part on farmland. There would be an inevitable compromise on farming activities in this particular case. However, the need for accommodating new housing in Heslington Parish has been found strategically necessary to meet the City's housing needs and, consequently, there will be some impact on farm activities.</p> <p>LDP, therefore, respectfully request that Policy HES:3 relates to all development, other than the strategic sites.</p> <p><b>Policy HES:7 – New Housing</b></p> <p>Policy HES:7 is a 'permissive policy' allowing housing development within particular locations. The policy does not, however, acknowledge the strategic housing allocation (ST15, or the proposed new Langwith garden village).</p> <p>LDP respectfully request that the Policy is amended to recognise that housing development will be permitted within the strategic allocation (whether that be ST15, or Langwith).</p>		Bu	HES: 2	<p>Quod/LDP believes Policy can be interpreted such that new business and employment will provide employment for only those living in the new the strategic development site. Quod/LDP argue that this, it is not in the interests of the City of York's economy.</p> <p>Policy states <i>"New development will be supported where: It does not compromise farming activities"</i>. Quod/LDP argues that, by definition strategic site allocation would have some impact on farmland and thus conflict with the York Draft Local Plan.</p> <p>Policy: New Housing and Housing and Community Facilities cover development of housing.</p>	<p>HPNP policy text clarified remove risk of misinterpretation. i.e. <i>"Within the strategic designated York Draft Local Plan housing sites to provide local facilities"</i></p> <p>Minor HPNP text change to clarify and reduce risk of misinterpretation.</p> <p>HPNP text clarified to better define scope of relevant policies.</p>
			Ru	HES: 3		
			Ho	HES:7		

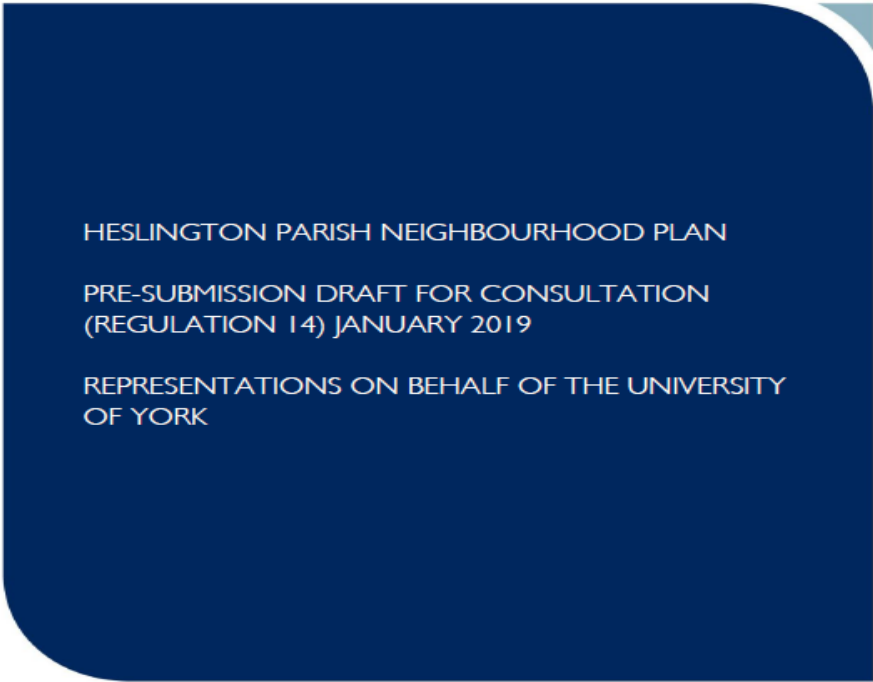
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Quod obo LDP	 <p><b>Policy HES:8 – Housing Mix and Affordability</b></p> <p>Along with housing mix, this Policy seeks to ensure that affordable housing is provided in accordance with the requirements of the York Local Plan. It specifically requires affordable housing that meets 'Heslington's needs'.</p> <p>As the strategic housing site for the new garden village (ST15, or Langwith) is proposed to meet the housing needs of the City, it would be inappropriate to restrict affordable housing on this site to meeting Heslington's needs only.</p> <p>LDP respectfully request that this Policy is clarified, and that in the case of ST15/Langwith, the affordable housing provision will be capable of providing for the wider City needs, as well as Heslington's.</p> <p><b>Policy HES:9 – Housing and Community Facilities</b></p> <p>This Policy seeks to ensure that housing on strategic sites are supported by relevant community infrastructure.</p> <p>LDP support this Policy, and it is one of the principle visions for the development of Langwith for the garden village to provide community infrastructure that sustains the new residential population of the village.</p> <p><b>Policy HES:13 – Sustainable Transport Provision</b></p> <p>Policy HES:13 requires a balanced and sustainable transport infrastructure on strategic allocation sites. Notably, it requires public transport facilities, pedestrian and cycle links throughout the allocations, and cycle and pedestrian facilities on any new link roads to the A64 and UoY.</p> <p>LDP support this proposition, and as noted earlier, it is a key vision of Langwith to provide a high quality public transport network serving the new garden village, in order to avoid the need for public transport routes through Heslington Village. Strong cycle and pedestrian links will be created as part of Langwith.</p>					
			Ho	HES: 8	Policy HES: 8 states "New housing development will be permitted if it includes a balanced mix of house types, to meet local need..." Quod/LDP argues this provision will be capable of providing for wider City needs as well as local needs.	HPNP policy text amended in line with Quod recommendation so as to clarify.
			Ho	HES: 9	This support for the Plan is welcomed.	No change.
			Tr	HES:13	This support for the Plan is welcomed.	No change.

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p><b>Policy HES:14 – Vehicular Traffic</b></p> <p>Policy HES:14 requires appropriate vehicular access to the strategic housing sites which avoids any additional traffic movements through Heslington Village. This is to be achieved through two mechanisms:</p> <ol style="list-style-type: none"> <li>1. The provision a principal vehicular access from the new garden village (ST15/Langwith) to the A64, and</li> <li>2. Avoiding vehicular, pedestrian and cycle connections to local roads through Heslington Village (or the access roads south of Heslington).</li> </ol> <p>LDP support the objectives of this policy but ask for it to be noted that there is a proposed secondary vehicular access to Langwith, providing a secondary access from Elvington Lane via the eastern end of Elvington Airfield. This falls within Elvington PC boundary and is shown in yellow on <b>Figure 2</b>.</p> <p>Providing a further access point into the new garden village, especially from Elvington Lane, will further minimise any prospective traffic movements through Heslington Village.</p> <p>LDP, therefore, respectfully request that Policy HES:14 recognises that a secondary access to the new garden village would benefit local highway amenity and further restrict any pressure from traffic movement on Heslington Village.</p> <p><b>Policy HES:15</b></p> <p>Policy HES:15 relates to traffic within the Heslington Conservation Area, and only supports development requiring highways improvements where <i>no harm</i> arises to the character or appearance of the Conservation Area, of where this is preserved or enhanced.</p> <p>Requiring that <i>no harm</i> occurs is inconsistent with the NPPF, which necessitates a balancing of the harm arising against the public benefits of a scheme that prevail.</p> <p>LDP, therefore, respectfully request that Policy HES:15 recognises that harm per se (arising from highway works) to the Heslington Conservation Area is not necessarily unacceptable in principle, and must be weighed against any public benefits of the development, consistent with the NPPF.</p>		Tr	HES: 14	Quod/LDP comment on possible future proposed access road links to ST15. These are matters for the York Draft Local Plan and not within the remit of this Plan.	No change.
			Tr	HES: 15	Quod/LDP argue at Policy: HES 15 <sup>1</sup> which states “...will be permitted only if those highway improvements preserve or enhance and cause no harm...” conflicts with NPPF.	HPNP policy text reviewed and amended so as to ensure consistency with NPPF i.e. “supported where [proposals] lead to significant harm, it can be demonstrated that substantial public benefit clearly outweighs that harm.”

<sup>1</sup> Policy references in response are based on the HPNP Pre-Submission Version



REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
Quod obo LDP	 <p><b>Summary</b></p> <p>In summary, LDP are largely supportive of the HNP, subject to the above matters. LDP wish to work with HPC to ensure the HNP is soundly based, and LDP would welcome the opportunity of discussing these representations further with HPC directly.</p> <p>Yours sincerely</p>  <p>Tim Waring Director</p>				This support for the Plan is welcomed.	

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	 <p>HESLINGTON PARISH NEIGHBOURHOOD PLAN</p> <p>PRE-SUBMISSION DRAFT FOR CONSULTATION (REGULATION 14) JANUARY 2019</p> <p>REPRESENTATIONS ON BEHALF OF THE UNIVERSITY OF YORK</p> <p>MARCH 2019</p> <p><b>O'Neill</b> ASSOCIATES</p> <p>Chartered Town Planning Consultants</p> <p>Lancaster House James Nicolson Link Clifton Moor York YO30 4GR 01904 692313 www.oneill-associates.co.uk</p>					

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	<p><b>CONTENTS</b></p> <p>1.0 Introduction</p> <p>2.0 Timescales for the Neighbourhood Plan</p> <p>3.0 Updates and Clarifications</p> <p>4.0 Proposed changes to the Policy Wording</p> <p>O'Neill Reference: Uhnpl903.stagh March 2019</p>					

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	<p>1.0 INTRODUCTION</p> <p>1.1 These representations are submitted on behalf of the University of York in relation to their significant landholdings in the designated area of the Heslington Parish Neighbourhood Plan. As part of the Neighbourhood Plan process, the University has previously held meetings with members of the Heslington Neighbourhood Plan Working Group and they have also provided comments on earlier drafts of the document. Some of these comments have been picked up in the pre-submission version but the ones that have not are repeated again here. There are also a number of further clarifications / updates that we wish to make to reflect the University's most recent representations on the Draft Local Plan for York as well as changes in the planning status of the University campus. The comments on the Neighbourhood Plan are structured around the following key sections:</p> <ul style="list-style-type: none"> <li>• Next Steps and Timescales</li> <li>• Updates and Clarifications</li> <li>• Proposed changes to the Policy Wording</li> </ul> <p>2.0 NEXT STEPS AND TIMESCALES</p> <p>2.1 At this point, we would also question whether it would be a worthwhile exercise to proceed to the next steps of the Neighbourhood Plan (independent examination, referendum and subsequently bringing the order into force) whilst the Draft Local Plan for York is still to go through the examination and subsequent adoption process. This is on the basis that:</p> <ul style="list-style-type: none"> <li>• The only sites being promoted for development within the Neighbourhood Plan are four strategic sites allocated for development within the Draft Local Plan</li> <li>• The proposed allocations all lie within the Green Belt and the definitive boundaries have not been properly considered through the examination process</li> <li>• The identification and modification of green belt boundaries are matters for the local planning authority to determine as part of the preparation of the Local Plan</li> </ul> <p>2.2 National planning policy states that neighbourhood plans should support the strategic development needs set out in the Local Plan and in normal circumstances, it would be correct that these strategic sites were identified in the plan for Heslington. However, the Local Plan for York is not yet adopted and the inclusion of the sites in the Neighbourhood</p>	Email	Gen		<p>O'Neill Associates (O'NA) note "... the University has previously held meetings with members of the Heslington Neighbourhood Plan Working Group...and reflect the University's most recent representations on the York Draft Local Plan"</p> <p>O'NA questions whether it is "a worthwhile exercise to proceed to the next steps of the Neighbourhood Plan... whilst the York Draft Local Plan has still to go through the examination..."</p>	<p>No change. Allocation of strategic sites for development in York is determined by the York Draft Local Plan and is not within the remit of this Plan.</p> <p>As other Parish NPlans have been progressed in York it is clear that absence of an adopted Local Plan is not a barrier.</p> <p>No change.</p>

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	<p>Plan could therefore lead to uncertainty regarding their planning status. The advice in National Planning Practice is helpful here, in that:</p> <p><i>"Should there be a conflict between a policy in a neighbourhood plan and a policy in a Local Plan, section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan."</i></p> <p>2.3 In theory, this means that if the boundaries of the strategic sites were to change between an order for the Neighbourhood Plan coming into force and the Local Plan being adopted, it is the Local Plan that would take precedence as the 'last document'. Nevertheless, to avoid any uncertainty during the intervening period or a scenario where the Neighbourhood Plan requires an immediate update, we would suggest that the Working Group either:</p> <ul style="list-style-type: none"> <li>• waits for the Local Plan to be adopted before progressing the Neighbourhood Plan to independent examination; or</li> <li>• includes some additional text at the foot of page 8, which clarifies that the extent of the strategic sites will be established in the adopted Local Plan and the extract from the draft proposals map is for illustrative purposes only</li> </ul> <p>3.0 UPDATES AND CLARIFICATIONS</p> <p>3.1 The opening 19 pages of the Neighbourhood Plan set the context for 17 individual policies contained later in the document. In addition, each written policy is then preceded by some supporting text to justify the chosen approach. Having reviewed the Plan in detail, it is clear that a series of updates / clarifications are required in relation to its coverage of the University and these are identified on the schedule overleaf:</p>	Email	Gen		<p>O'NA refers to potential "...boundaries of the strategic sites ...changing..."</p> <p>O'NA asks for "additional text at the foot of page 8, which clarifies that the extent of the strategic sites will be established in the adopted Local Plan and the extract from the draft 2018 Policies/Proposals Map is for illustrative purposes only"</p>	<p>The HPNP does not allocate or designate land or specific locations for strategic sites development.</p> <p>No change.</p> <p>Plan specifically references York Draft Local Plan – 2018 Policies /Proposals Map South and City of York Local Plan - Publication Draft (Regulation 19 Consultation February 2018.</p> <p>No change.</p>

REF	COMMENT		SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	Paragraph No.	Proposed change and explanation			See below.	This table of requested clarifications and proposed responses is shown at the end of the document.	See below.
	5.6, 15.2.1 and 15.4.2	The outline planning permission for Heslington East was approved in June 2007 and was most recently amended in March 2016 (15/02923/OUT). The site covers an area of 116 ha					
	7.2	The HPNP cannot itself enable and shape the redevelopment and growth of the UoY campuses, which is the role of the York Local Plan.					
	8.2	The economic impact of both the University of York and the Science Park within the city were recently subject of a research paper prepared by Dr Stephen Martin of the Nicol Economics. The key findings were: <ul style="list-style-type: none"><li>• There were 4,200 fte staff employed directly by the UoY.</li><li>• Overall expenditure of £81 million on goods and services of which roughly 20% was spent locally (that is, £16.2 million) supporting around 350 fte jobs</li><li>• The University's 16,600 FTE students spent money off-campus in York. This expenditure, coupled with conference delegate spend off-campus, supported around 1,300 fte jobs.</li><li>• Therefore, the total 1st round effects from direct employment, spend with local suppliers and student spend, supported around 5,900 jobs in York.</li><li>• Subsequent multiplier effects support a further 600 jobs in York.</li><li>• Overall in 2016/17 the activities of the University supported an estimated 6,600 fte jobs in York.</li><li>• A further c. 1,000 jobs in businesses located on the Science Park and that the overall contribution to employment in York from the Science Park is around 1,200 fte jobs</li><li>• It is estimated the University of York and the Science Park together account for around 8% (1 in 12) of all jobs in the City of York Unitary Authority area</li></ul>					
	10.2.1, 10.6.1 and 15.2.6	These paragraphs need to be updated in order to reflect the most recent listings at the University of York campus, which include: <ul style="list-style-type: none"><li>• Central Hall</li><li>• Derwent Walkway</li><li>• Designed Landscape (Campus West)</li><li>• Derwent Walkway</li><li>• Dryad Sculpture</li><li>• Langwith College</li><li>• Spiral walkways and untitled Sculpture (JB Morrell Library)</li></ul>					
	15.2.4	Replace with 'The University Strategy 2014 – 2020 includes the following Key and Enabling Objectives.....'					
15.4.7	Delete this paragraph						

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	4.0	PROPOSED CHANGES TO THE WORDING OF INDIVIDUAL POLICIES				
	4.1	Paragraph 41 of the National Planning Practice Guidance provides advice on the preparation of policies within a neighbourhood plan. It states that they should be clear and unambiguous and drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. The policies should also be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which they have been prepared. In order to respond to this requirement, we would propose the following changes to the policies within the Neighbourhood Plan for Heslington:				
	4.2	Policy HES 2 relates to new business and employment development, stating that it will be permitted in certain locations, which include: <ul style="list-style-type: none"><li>The existing science park and business zones on University campuses</li></ul> However, there is no specific 'business zone' identified on either University campus. Policy ED1 of the Draft Local Plan allows for the following range of higher education and related uses on the University's campuses and we consider that Policy HES 2 should be altered to reflect this: <ul style="list-style-type: none"><li>academic, teaching, research and continuing professional development uses;</li><li>housing for staff and students;</li><li>arts, cultural, sports and social facilities ancillary to higher education uses; conferences;</li><li>knowledge based businesses including research led science park; and</li><li>any other uses ancillary to the university including support services for the uses identified above</li></ul> Our suggestion would be to take the first bullet point of Policy HES 2 and split this in to two separate locations, specifically: <ul style="list-style-type: none"><li>The existing Science Park</li><li>University campuses, provided it is for knowledge based or research led business or ancillary to the University, including support services</li></ul>		HES:2	HES:2 states: New business and employment development will be permitted in the following locations: Existing Science Park and business zones on University campuses.  Point raised: there is no specific 'business zone' identified on either University campus	HPNP policy text amended to clarify scope. Reference to 'business zones' removed.
	4.3	Policy HES 4 relates to sustainable design and seeks to promote high quality development in accordance with a series of design principles. The wording of the policy is considered to be too generic though, particularly the first bullet point, which states:		HES:4	Policy HES 4 ... The wording of the policy is considered to be too generic ..."	

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	<ul style="list-style-type: none"> <li>Complementing the surrounding character of the Parish in terms of scale, height, massing, spacing, urban grain and set back from street frontages</li> </ul> <p>Clearly, the Parish is made up of different character areas. For instance, the scale, height and mass of buildings on Campus East or Campus West are quite different to that within the historic village core. In order to address this, we would suggest either substituting the word 'Parish' for 'immediate locality' or including an extra bullet point which reads:</p> <ul style="list-style-type: none"> <li>Bringing forward new development on the University's campuses in accordance with the approved Development Briefs / Masterplans and their subsequent versions.</li> </ul>			HES:4	Suggests change in policy text as this is currently considered as too generic/embracing.	HPNP policy text amended to clarify and reference to Conservation Area removed.
	4.4 A similar generalisation occurs in Policy HES 5 on Urban Character, which appears to have been drafted specifically in relation to new development within Heslington Conservation Area but does not say so explicitly. If this is the intention, then the area to which this policy applies should be clearly defined.			HES:5	Suggests "generalisation" in policy scope.	HPNP policy text on Urban Character amended to differentiate policy focus.
	4.5 Policy HES 7 sets out the circumstances within which new housing development should be permitted, which is basically limited to infill development. There are no additional housing sites put forward in the Neighbourhood Plan. However, it is important to acknowledge the strategic housing locations proposed in the Local Plan within this Policy. This can be achieved via a simple reference to them at the outset of the policy to clarify that 'Beyond the strategic allocations.....housing development will be permitted in the following locations.....'			HES:7	Suggests policy scope should reference the strategic housing locations.	HPNP policy text amended and clarified in line with O'NA recommendation i.e. "Beyond the strategic allocations ...etc"
	4.6 Policy HES 10 seeks to control the development of student housing outside of the University campus although it is not clear whether this policy relates to new-build only or all forms of development, including changes of use. In relation to changes of use, the Draft Local Plan already contains policies to restrict the number of student households at both a street and neighbourhood level by applying appropriate thresholds and these are currently enforced through a Supplementary Planning Document. Permitted development rights to move between the C3 and C4 use class have also been removed by an Article 4 Direction. It is through these mechanisms that the Council is seeking to implement its strategy on the management of student households but Policy HES 10 appears to undermine this approach.			HES:10	Suggests policy does not differentiate between purpose-built halls and HMOs.	HPNP policy text amended to reference purpose built student accommodation.
	4.7 There also appears to be inconsistencies between the main policy wording and the interpretation below it. Our reading of the policy wording is that the restrictions only apply to the built-up area of Heslington Village but the 'interpretation' appears to extend them to the				'Built area of village' in policy text not defined. Interpretation refers to strategic sites.	HPNP policy text amended to clarify.



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O'Neill obo UOY	<p>strategic housing allocations as well. If this is the case, then the justification for this approach needs to be properly explained.</p> <p>4.8 Policy HES 11 identifies a series of local green spaces within the Parish and seeks to maintain their open and green character by restricting the forms of development that could take place there. Fourteen local green spaces are identified in total although the boundaries of these spaces are not properly defined. For example, the Campus West Lake and Grounds is designated as Local Green Space no. 4 but the extent of this area is left open to interpretation.</p> <p>4.9 It is also suggested that the Lord Deramore School site should be excluded from the designation as this is an established educational facility where additional development beyond the 'small-scale' examples listed in the interpretation of the policy could be required. An alternative would be to include some additional text in the interpretation section to clarify that</p> <p>"New development will not be supported on land designated as Local Green Space except in very special circumstances, where it is ancillary to the main use or plays a complementary role."</p> <p>4.10 Similar to Policy HES 11, Policy HES 12 seeks to identify a series of open space buffer zones and important green spaces where an added layer of planning control will be applied. This requires applicants to demonstrate that any development does not cause significant harm, must be adequately mitigated or compensated for. Again, the important spaces are not properly defined within the document and an accurate reference plan is therefore required, particularly around Campus East (Green Space no. 1) where the acceptable locations for development, green buffers and landscape areas have already been established by the outline planning permission and the approved masterplans.</p> <p>4.11 Policy HES 15 relates to traffic management and controls within the Heslington Conservation Area and states that where development relies on highway improvements, they will only be permitted where those improvements preserve, enhance or cause no harm to the character and appearance of the conservation area. This sets a fairly high bar and the nature of highways improvements and the need for them to be easily visible will often result in some degree of harm. In order to make this policy more consistent with the National Planning Policy on development affecting heritage assets, we suggest some additional wording to clarify that</p>			<p>HES: 11</p> <p>HES:12</p> <p>HES:15</p>	<p>Boundary definition of LGS not clear.</p> <p>Suggests removing Lord Deramore's Primary School Grounds from LGS designation as other 'ancillary' developments beyond 'small-scale' examples may be required.</p> <p>O'NA note boundary definitions for 'other green spaces' not properly defined.</p> <p>O'NA suggests Policy HES: 15 may be considered to conflict with NPPF guidance.</p>	<p>Maps updated with input from CYC.</p> <p>LGS designations for Campus West, now Grade II listed and UoY Sports fields both removed.</p> <p>Maps incl. 'Buffer zone' boundary updated with input from CYC.</p> <p>HPNP policy text reviewed and amended so as to ensure consistency with NPPF i.e. "supported where [proposals] lead to significant</p>

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
						harm, it can be demonstrated that substantial public benefit clearly outweighs that harm."

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
O'Neill obo UOY	<p>"Where development relies on highway improvements within the Heslington Conservation Area, they will be permitted only if those highway improvements preserve or enhance and cause no harm to the character of the conservation area or it can be demonstrated that the public benefits of the development outweigh the harm".</p> <p>4.12 Finally, Policy HES 17 identifies the University of York as a special policy area but the purpose of this policy is unclear when Campus East has outline planning permission which endures for 20 years and the development of Campus West has previously come forward in accordance with the 1999 Development Brief, which has been recent updated.</p> <p>4.13 For Campus East in particular, new policy is not able to change the consent or the key principles that have been established by this permission. For example, the uses permitted on campus are covered by planning condition. Building and landscape design are controlled via Council approved design and landscape briefs in response to planning conditions. These are permitted to be updated as the next phase of development is rolled out.</p> <p>4.14 The supporting text to Policy HES 17 (from paragraph 15.4 onwards) is also fairly ambiguous as there are some sections of it that appear to relate to Campus West and others to Campus East, which are each of a markedly different character and context. The enclosed schedule of changes seeks to correct some inaccuracies in the supporting text but the fundamental point in relation to Policy HES 17 is that it needs to be simplified and acknowledge the frameworks for decision making that are already in place. Our suggestion for the revised wording of Policy HES 17 would be as follows:</p> <p>On the University of York's West and East campuses, the following range of higher education and related uses will be permitted:</p> <ul style="list-style-type: none"> <li>• academic, teaching, research and continuing professional development uses;</li> <li>• housing for staff and students;</li> <li>• arts, cultural, sports and social facilities ancillary to higher education uses; conferences;</li> <li>• knowledge based businesses including research led science park; and</li> <li>• any other uses ancillary to the university including support services for the uses identified above</li> </ul>			HES:17	<p>It is agreed outline planning permission is laid down in the conditions associated with the Secretary of State's decision dated 24<sup>th</sup> May 2007 reference 04/01700/OUT (and subsequently amended March 2016)</p> <p>O'NA suggests Policy HES: 17 (University of York) in Pre-Submission Plan version, acknowledges the frameworks for decision making already approved and in place. E.g. <i>"Individual development proposals shall be brought forward in accordance with the design and land use principles established"</i></p>	<p>HPNP policy text amended to be consistent with York Draft Local Plan Policies ED1-3.</p> <p>HPNP text para. 15.4 (Good Practice Development Principles) amended to reflect ongoing masterplan /design brief work and in respect of Design Review.</p> <p>NOTE: Policy HES: 19 now</p>

REF	COMMENT	SOURCE	TOPIC	PARA	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
					<i>by the original outline planning permission and approved Masterplan for Campus East and the adopted Development Brief for Heslington West."</i>	refers to the University of York in the HPNP Submission version.
O'Neill obo UOY	<p>Individual development proposals shall be brought forward in accordance with the design and land use principles established by the outline planning permission and approved Masterplan for Campus East and the adopted Development Brief for Heslington West. As future iterations of these documents emerge, consultation will be carried out with the local community prior to being afforded any weight in the decision-making process.</p> <p>END</p>					

## SCHEDULE OF COMMENTS AND RECOMMENDATIONS ON PRE-SUBMISSION DRAFT HPNP

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
HES: 1	<b>Main Street- Change of Use</b>			
	Within the Main Street area, application for changes of use to Retail (A1), Food and drink (A3, A4) and Medical and other community facilities (D1) will be permitted subject to:	No comment	No recommendation	No change.
	There being no significant detrimental impact on traffic safety or capacity	No comment	No recommendation	No change.
	There being no significant detrimental impact on the amenities of nearby residents e.g. by restricting the hours of operation	No comment	No recommendation	No change.
	There is no change of use involving the loss of retail, food and drink, business or community facilities in Main Street including changes of use of ground floors to residential use	This policy needs amending to allow for the possibility of permanently vacant retail, food and drink, business or community premises, and a new "fallback" clause policy is therefore required.	We suggest that the following clause is added to the end of this policy: <i>"... including changes of use of ground floors to residential use unless it can be satisfactorily demonstrated that none of the above are viable uses." "In the event of there being no demonstrable acceptable viable use, any alterations to the premises must satisfy the requirements of Neighbourhood Plan policies HES 4, 5 &amp; 6 and Section 16 Additional Guidelines."</i>	HPNP policy text (HES: 1) amended to reflect HE recommendation on vacant premises.

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	Proposals to diversify the use of public houses will be supported, providing the use as a public house remains as part of the mix of uses.	This policy is welcomed	No recommendation	No change.
<b>HES: 2</b>	<b>New Business and Employment Development</b>			
	New business and employment development will be permitted in the following locations:	No comment	No recommendation	No change.
	Existing Science Park and business zones on University campuses	Sports usage is "development" and will happen outside these zones		HPNP policy text (HES: 2) amended to include provision for sports usage i.e. <i>“Development for sports usage will be supported where there is a proven local need and providing there is no significant adverse impact on traffic safety, congestion or residential amenity”</i>
	Within the strategic designated York Draft Local Plan housing sites, where they comprise local facilities for the new housing	No comment	No recommendation	No change.
	Within farm complexes, to support diversification, providing there is no significant adverse impact on traffic safety, congestion or residential amenity	No comment	No recommendation	No change.
<b>HES: 3</b>	<b>Agriculture and Rural Enterprise</b>			
	New development will be supported where:	No comment	No recommendation	No change.

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	It is sited and designed to support and acknowledge the working farms and rural businesses of Heslington	No comment	No recommendation	No change.
	It ensures that farm traffic is accommodated	No comment	No recommendation	No change.
	It does not compromise farming activities	No comment	No recommendation	No change.
<b>HES: 4</b>	<b>Sustainable Design</b>	No comment	No recommendation	No change.
	New development will be supported where it uses high quality design incorporating key principles from the Design Council's <i>Building for Life 12</i> and based on sustainable urban design principles. This includes:	No comment	No recommendation	No change.
	Complementing the surrounding character of the Parish in terms of scale, height, massing, spacing, urban grain and set-back from street frontages	No comment	No recommendation	No change.
	Providing active frontages to streets and public spaces, so as to provide natural surveillance	No comment	No recommendation	No change.
	Providing a clear separation between private spaces (rear gardens) and public spaces and streets	No comment	No recommendation	No change.
	Creating attractive, safe, permeable and convenient pedestrian environments, linking to the surrounding footpath network	No comment	No recommendation	No change.



Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	Using permeable materials for hard surfaces	No comment	No recommendation	No change.
	Providing a range of parking solutions as an integral part of layout, ensuring that parking does not dominate the street scene	No change.	No recommendation	No change.
	Within the Conservation Area, using materials that respect and are sympathetic to the context and building traditions of the village	No comment	No recommendation	No change.
<b>HES: 5</b>	<b>Urban Character</b>	Should there be a complimentary "Rural Character" policy?	Consider policies to address the appropriate conservation of hedge rows, woodland and individual trees, areas of water and watercourses, lanes, tracks and paths.	Policies on Local Green Space and Green Infrastructure are considered to adequately address this comment. No change.
	New development and extensions to existing buildings will be supported where they complement the local and historic character of Heslington, including:	It is unclear whether the intention this policy is focused solely on Heslington village, or is to apply to all development within the Heslington Neighbourhood Plan area.	Reword as follows: "New development and extensions to existing buildings within the existing "settlement boundary and on allocated sites (with the exception of Site ST27)"will be supported..." [ST27 is the potential extension of Campus East.]	Noted. HPNP policy text amended to clarify where Urban Character policy applies specifically to the Conservation Area or wider Heslington Parish.
	Complementing the vernacular forms, scale and character of the Heslington Conservation Area	No comment	No recommendation	
	Respecting the character and setting of Heslington, including the medieval pattern of long, narrow burgage plots in Main Street	No comment	No recommendation	

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	Preserving gardens and open spaces behind and between the houses and only allowing sub-division of such gardens and open spaces where the resulting layout would maintain the character and amenity value of the village	No comment	No recommendation	
	Maintaining historic paths and routes	No comment	No recommendation	
	Maintaining key views and the setting of local landmarks to help orientation and provide local distinctiveness	No comment	No recommendation	
	Having regard to the diverse character of the historic environment, based on variety in styles and construction methods	No comment	No recommendation	No change.
	Retaining wide green verges, without further crossways	No comment	No recommendation	No change.
	Adhering to the Additional Guidelines (see Section 16) in so far as they are material to the proposal	No comment	No recommendation	Section on Additional Guidelines has been deleted and salient points included in updated Policy/ Community Actions policy text.
		There is no specific reference to new development on strategic allocation sites.	We suggest an additional new clause as follows: "New housing development on the strategic allocation sites will be supported only if a masterplan or design statement has been submitted and agreed, which demonstrably satisfy the requirements of policies HE 4, 5 & 6 and Section 16 Additional Guidelines."	Housing and Community Facilities policy (now HES: 11) text amended to clarify reference to community facilities, masterplanning and the relevant requirements of other HPNP housing policies.

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
<b>HES: 6</b>	<b>Conversion of Existing Buildings</b>			
	Building conversions and extensions which complement the vernacular forms, scale and character of buildings in the village will be supported. In particular, extensions should avoid dominating the parent	No comment	No recommendation	No change.
<b>HES: 7</b>	<b>New Housing</b>			
	Housing development will be permitted in the following locations:	No comment	No recommendation	No change.
	Infill development appropriate to the draft Green Belt, within the built area of Heslington village	Could this be interpreted as supporting development within the Green Belt?	We suggest re-wording as follows: <i>"Infill development on strategic allocation sites appropriate to the Green Belt, within the built area of Heslington village, with the exception of Site ST27."</i>	HPNP text amended and reference to Green Belt removed.
	Outside of these locations, small-scale infill housing development will be permitted, providing:	No comment	No recommendation	No change.
	It comprises infill development within an existing housing row or cluster	No comment	No recommendation	No change.
	It would avoid the creation or extension of 'ribbon development'	No comment	No recommendation	No change.
	New housing will be permitted if it:	No comment	No recommendation	No change.
	Maintains or enhances the amenities of existing residential properties	No comment	No recommendation	No change.

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	Complements the character of the area, including complementing the spatial characteristics of existing housing in terms of setback, spacing and garden space.	No comment	No recommendation	No change.
<b>HES: 8</b>	<b>Housing Mix and Affordability</b>			
	New housing development will be permitted if it includes a balanced mix of house types, to meet local need and should meet the Government's Technical housing standards.	No comment	No recommendation	No change.
	Affordable housing provided in response to York Draft Local Plan requirements will be supported if provided within the development site, so as to meet Heslington's needs, and not be provided remotely through financial contributions.	No comment	No recommendation	No change.
	Affordable housing will be supported where it is tenure blind, forming an integral part of any scheme.	No comment	No recommendation	No change.
<b>HES: 9</b>	<b>Housing and Community Facilities</b>			
	Development of housing on the strategic sites will be supported where it incorporates community facilities as part of the mix of uses, to support the additional needs of the		We suggest re-wording as follows: <i>"Development of housing on the strategic sites, with the exception of Site ST27 will be supported where it incorporates community facilities"</i> [ST27 is the proposed extension of Campus East.]	HPNP Housing and Community Facilities policy text amended to include reference to community facilities at the strategic housing development sites. ST27 is allocated for B1b employment floorspace for knowledge based businesses including research-led science park uses and other higher education and related

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	new residential population. This includes recreational facilities, convenient paths and green spaces to encourage healthy lifestyles.			uses. The HPNP does not allocate any sites for development.
	If sites are developed incrementally, a masterplan should be prepared, including the location of community facilities.	No comment	No recommendation	No change.
<b>HES: 10</b>	<b>Student Accommodation</b>			
	New student residential accommodation will be permitted within the University of York campuses.	This is a very broad brush policy which allows development anywhere on the campuses, qualified by any relevant CYC policies.	We suggest re-wording as follows: <i>"New student residential accommodation will be permitted within the defined boundary of the University of York campuses and including site ST4".</i>  We suggest the relevant maps are amended to define the University of York Campuses as per the attached maps. [no attachment]	<b>The HPNP does not allocate any sites for development</b> and therefore considers allocation of land use at ST4 a York Local Plan matter and not within the remit of this Plan.  Maps updated with input from CYC. It is considered the boundaries of UoY are well-established.
	Student accommodation will not be permitted within the built area of Heslington village, in the interests of maintaining a balanced range of housing for local people.	Is the "built area of Heslington village" defined?	If not indicated on the relevant maps, identify the boundary of the built area of Heslington Village.	HPNP policy text has been clarified to cover new purpose built student accommodation only within the existing development boundaries of the University of York.
<b>HES: 11</b>	<b>Local Green Space</b>			
	Designated Local Green Spaces must remain as open community spaces.	No comment	No recommendation	No change.

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	<p>Small size, ancillary development will be permitted, providing it meets all of the following:</p> <ul style="list-style-type: none"> <li>• The open and green character of the Green Space is not compromised</li> <li>• It comprises facilities to support the community use of space</li> <li>• The community, wildlife, amenity or other values as a Local Green Space are preserved or enhanced</li> </ul>	No comment	No recommendation	No change.
<b>HES: 12</b>	<b>Green Environment</b>			
	<p>New development will be supported when it can be shown to avoid significant harm to the environment of Heslington, including:</p>	<p>This policy does not address the significant incursion into the Green Belt and land identified as "existing open space" (see Policies Map (South) of the City of York draft Local Plan -February 2018) implied by the allocation of Site ST 27.</p> <p>The development of Site ST24</p> <p>The primary purpose of the York Green Belt is to</p>	<p>We suggest re-wording as follows:  <i>"New development will be supported when it can be shown to avoid significant harm to the environment of Heslington Parish as a whole...."</i></p> <p>ST24 is not recognised.</p>	<p>HPNP policy text has been amended in line with HE recommendation.</p>

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
		safeguard the special character and setting of the historic city, a development in the Green Belt, therefore, has the potential to impact upon elements which contribute towards the significance of York.		
	Trees, woods, hedges, ditches, grass field margins, flora and fauna	No comment	No recommendation	
	Local wildlife habitats and protected landscapes, including the Common Land and SSSI	No comment	No recommendation	
	Designated and significant Local Green Spaces as listed in para. 12.3 and 13.5	No comment	No recommendation	
	Where significant harm cannot be avoided, it must be adequately mitigated, or as a last resort, compensated for.	No comment	No recommendation	
	Opportunities to incorporate improvements for green infrastructure in and around developments are to be encouraged.	No comment	No recommendation	
<b>HES: 13</b>	<b>Sustainable Transport Provision</b>			
	New housing development on the strategic allocation sites will be supported where there is balanced and	No comment	No recommendation	No change.



Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	sustainable transport provision, including:			
	Public transport facilities, including new bus stops	No comment	No recommendation	No change.
	A layout providing convenient pedestrian links to footpaths, bus stops and community facilities	No comment	No recommendation	No change.
	Facilities for cyclists and pedestrians on any new link roads to the A64 and University	No comment	No recommendation	No change.
	Where a site is to be developed incrementally, a transport masterplan should be prepared for that site, showing links to adjacent sites and the surrounding area.	No comment	No recommendation	No change.
<b>HES: 14</b>	<b>Vehicular Traffic</b>			
	New development will be permitted where vehicular access to the strategic housing sites is provided, to safely accommodate the additional traffic generated and avoid additional traffic movements through Heslington village. Achieving this would involve:	No comment	No recommendation	No change.
	Providing the principal vehicular access from ST15 (Land West of Elvington Lane) to the A64	No comment	No recommendation	No change.
	Avoiding vehicular, pedestrian and cycling connections to local roads	No comment	No recommendation	No change.

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
	through Heslington village or to the access roads south of Heslington			
<b>HES: 15</b>	<b>Traffic in Heslington Conservation Area</b>			
	Development will be supported only where the increase in traffic would cause no significant harm to the character or appearance of the Heslington Conservation Area, taking account of parking, movement and disturbance.	No comment	No recommendation	No change.
	Where development relies on highway improvements within the Heslington Conservation Area, they will be permitted only if those highway improvements preserve or enhance and cause no harm to character or appearance of the Conservation Area.	No comment	No recommendation	No change.
<b>HES: 16</b>	<b>Paths and other Rights of Way</b>			
	New development will be supported where it does not obstruct or impinge on public footpaths, bridleways, cycle-paths or byways.	No comment	No recommendation	No change.
	New development near to public footpaths, bridleways, cycle paths or byways will be supported where it preserves or enhances their distinctive character.	No comment	No recommendation	No change.

Policy	Text	Comment	Recommendation (amended text in <i>italic</i> )	ACTION / AMENDMENT TO PLAN
HES: 17	University of York			
	University of York campus sites West and East are allocated for:	No comment	No recommendation	No change.
	Education and uses ancillary to the primary purpose as a university	No comment	No recommendation	No change.
	A business and science park	No comment	No recommendation	No change.
	Development of the campuses will be supported, subject to:	No comment	No recommendation	No change.
	The green open space 'buffer zones' protecting the landscape settings of Heslington village and Badger Hill remaining undeveloped (see Figure 4)	The map is distorted and the colours difficult to distinguish	We suggest re-wording as follows: <i>"The green open space 'buffer zones' and the rural landscape to the south of Campus East protecting the landscape settings of Heslington village, wider Parish and Badger Hill remaining undeveloped (see Figure 4)"</i>	Definition of new Green Belt boundaries is a matter for the emerging York Draft Local Plan. No change.  HPNP maps have been updated with input from CYC.
	Implementation of good practice principles (see para. Error! Reference source not found.)		The error noted in the text needs addressing	HPNP text has been corrected.

## SCHEDULE OF COMMENTS AND RECOMMENDATIONS ON PRE-SUBMISSION DRAFT HPNP

Policy Para. No.	Comment/ Proposed change and explanation	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
5.6, 15.2.1 and 15.4.2	The outline planning permission for Heslington East was approved in June 2007 and was most recently amended in March 2016 (15/02923/OUT). The site covers an area of 116 ha	It is agreed outline planning permission is laid down in the conditions associated with the Secretary of State's decision dated 24th May 2007 reference 04/01700/OUT and was amended March 2016.	HPNP text amended in line with O'NA recommendation.
7.2	The HPNP cannot itself enable and shape the redevelopment and growth of the UoY campuses, which is the role of the York Local Plan.	Para 7.2 states "The HPNP aims to deliver sustainable development by the following means: Enabling and shaping the redevelopment and growth of the University of York campuses	HPNP text amended to state "HPNP ...Recognises the development of the University of York."
8.2	<p>The economic impact of both the University of York and the Science Park within the city were recently subject of a research paper prepared by Dr Stephen Martin of the Nicol Economics. The key findings were:</p> <ul style="list-style-type: none"> <li>• There were 4,200 fte staff employed directly by the UoY.</li> <li>• Overall expenditure of £81 million on goods and services of which roughly 20% was spent locally (that is, £16.2 million) supporting around 350 fte jobs</li> <li>• The University's 16,600 FTE students spent money off-campus in York. This expenditure, coupled with conference delegate spend off-campus, supported around 1,300 fte jobs.</li> <li>• Therefore, the total 1st round effects from</li> </ul>	<p>O'NA kindly provides additional background economic impact data. O'NA suggests updating or supplementing Plan text accordingly.</p> <p>References to UoY data at 8.2 (bullet point #1*, other data generally available from UoY /YSPL websites but not source referenced) *Source: <a href="https://www.york.gov.uk/downloads/file/15869/cd001_-_city_of_york_local_plan_publication_draft_regulation_19_consultation_february_2018">https://www.york.gov.uk/downloads/file/15869/cd001_-_city_of_york_local_plan_publication_draft_regulation_19_consultation_february_2018</a></p>	<p>Additional Background economic impact data supplied by O'NA, included where relevant.</p> <p>Source now clearly referenced to reflect the latest York Draft Local Plan data.</p>

Policy Para. No.	Comment/ Proposed change and explanation	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
	<p>direct employment, spend with local suppliers and student spend, supported around 5,900 jobs in York.</p> <ul style="list-style-type: none"> <li>• Subsequent multiplier effects support a further 600 jobs in York.</li> <li>• Overall in 2016/17 the activities of the University supported an estimated 6,600 fte jobs in York.</li> <li>• A further c. 1,000 jobs in businesses located on the Science Park and that the overall contribution to employment in York from the Science Park is around 1,200 fte jobs</li> <li>• It is estimated the University of York and the Science Park together account for around 8% (1 in 12) of all jobs in the City of York Unitary Authority area</li> </ul>		
10.2.1, 10.6.1 and 15.2.6	<p>These paragraphs need to be updated in order to reflect the most recent listings at the University of York campus, which include:</p> <ul style="list-style-type: none"> <li>• Central Hall</li> <li>• Derwent Walkway</li> <li>• Designed Landscape (Campus West)</li> <li>• Derwent Walkway</li> <li>• Dryad Sculpture</li> <li>• Langwith College</li> <li>• Spiral walkway and untitled Sculpture (JB Morrell Library)</li> </ul>	<p>10.2.1 and 10.6.1 state “including its 21 listed buildings”</p> <p>Response from Historic England (HE) refers to “32 Grade II listed buildings”.</p> <p>15.2.6 seeks only to give examples not a full listing.</p>	<p>HPNP text amended in line with HE recommendation.</p> <p>No change</p> <p>Listed buildings changed to listed buildings and structures for consistency.</p>
15.2.4	<p>Replace with ‘The University Strategy 2014 – 2020 includes the following Key and Enabling Objectives.....’</p>	<p>15.2.4 states:</p> <p>“In its latest published 2014-2020 Master Plan [<i>which is currently in review</i>] the University stated:-</p>	

Policy Para. No.	Comment/ Proposed change and explanation	RESPONSE / COMMENT	ACTION / AMENDMENT TO PLAN
		<p><b>Key objectives</b></p> <p>To be a world leader in research</p> <p>To offer outstanding teaching and learning</p> <p>To offer all our students an outstanding and valuable experience</p> <p><b>Supporting objectives</b></p> <p>To be sufficiently large to be excellent, resilient and financially sustainable</p> <p>To be organised in the most efficient and effective way</p> <p>To work effectively with other organisations and stakeholders”</p>	HPNP text amended in line the latest published University Strategy 2014 – 2020 to include Key and <b>Enabling</b> Objectives.
15.4.7	Delete this paragraph	<p>15.4.7 states “<b>Design Review</b>”</p> <p>Independent design review is important, as described in Paragraph 62 of the NPPF. This is especially important for taller buildings, to assess whether they are of exceptional design quality. Design review is suggested at a relatively early and conceptual stage, and then to test detailed design proposals at a later stage.</p>	HPNP text amended at 15.4.6 and original para 15.4.7 referring to “Design Review” deleted.



## Schedule of CYC Comments on the Pre-Submission Draft Heslington Parish Neighbourhood Plan

### Main Document

Page	Policy/ Para./Section/Table/Map ref	Comments	ACTION / AMENDMENT TO PLAN
	General comment	It would be useful if paragraph numbers could be added for all paragraphs for clarity.	Agreed.
	General comment	The pre-submission version usefully shows the evidence and data gathered as part of the Neighbourhood Plan process and how this has been used to form the basis of the policies. All of this information should be put into the Consultation Statement when the Submission Version of the Neighbourhood Plan is written.	Noted.
	General comment	References are made throughout the Pre-Submission version to the 2012 NPPF this is useful for context. In February 2019 an updated NPPF was released by government. When the Submission version of the plan is written it will need to reference the 2019 NPPF.	Noted and agreed. HPNP Submission version documents have been updated in line with NPPF (2019).
	General comment	Copyright is required for all CYC Maps as follows: “Based upon the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office, Crown Copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. City of York Council, Licence No. 1000 20818. Prepared by Strategic Planning Team, 2018”	Noted and agreed.



Page	Policy/ Para./Section/Table/Map ref	Comments	ACTION / AMENDMENT TO PLAN
7	Section 5 Paragraph 5.1.3	<p>National planning policy (Paragraphs 83-85 of the 2012 NPPF and Paragraphs 136-139 of the 2019 NPPF) is clear that the identification and modification of green belt boundaries are matters for the local planning authority to determine. It goes on to state that these processes should be undertaken as part of the preparation or review of a local plan.</p> <p>At present, York does not have an adopted Local Plan. In the meantime it is necessary for the Neighbourhood Plan to be in general conformity with the strategic policies of the development plan. Within this context the appropriate strategic Green Belt policies are the saved policies of the otherwise revoked Yorkshire and Humber Plan Regional Spatial Strategy (2008) (the RSS).</p> <p>Until a Local Plan for York is adopted, development management decisions relating to proposals falling within the general extent of the Green Belt have and will be made on the basis that the land in question should be treated as Green Belt.</p> <p>The Upper and Nether Poppleton Neighbourhood Plan, Rufforth with Knapton Neighbourhood Plan and Earswick Neighbourhood Plan have all been through examination with an Independent Examiner. The Examiner's recommendations included in his reports included a series of modifications to the Neighbourhood Plans green belt policies to reflect the context of York Green Belt and background to the emerging Local Plan. A full copy of the Examiner's Reports are available via the links below:</p> <p><a href="https://www.york.gov.uk/downloads/file/13410/examiners_report">https://www.york.gov.uk/downloads/file/13410/examiners_report</a>  <a href="https://www.york.gov.uk/downloads/file/16753/rufforth_with_knapton_np_examiners_report">https://www.york.gov.uk/downloads/file/16753/rufforth_with_knapton_np_examiners_report</a>  <a href="https://www.york.gov.uk/info/20051/planning_policy/1747/earswick_neighbourhood_plan">https://www.york.gov.uk/info/20051/planning_policy/1747/earswick_neighbourhood_plan</a></p> <p>In particular, the Examiner's modifications take account of national advice on the principle of the identification of detailed Green Belt boundaries whilst safeguarding the general application of this important and nationally-recognised planning tool.</p> <p>The Examiner recommends that the neighbourhood plans continues to apply the approach to the identification of the Green Belt as set out currently in the RSS and the Fourth Set of Changes Development Control Local Plan (2005) on an interim basis until such times as the emerging Local Plan is adopted. This will ensure that the preparation of the emerging Local Plan is used as the mechanism for the detailed identification of the York Green Belt boundaries in accordance with national planning policy.</p>	HPNP text amended to reflect current position of Green Belt in York and give explanatory comment.

Page	Policy/ Para./Section/Table/Map ref	Comments	ACTION / AMENDMENT TO PLAN
		<p>It will also provide full and proper opportunity for developers and land owners to contribute to this debate both in general terms and to provide the agreed levels of development for the City.</p> <p>If the Heslington Neighbourhood Plan is submitted and examined in advance of the Local Plan being adopted then we would suggest that the same approach is taken with regard to the setting of an interim Green Belt boundary in the Heslington Neighbourhood Plan to that advised by the examiner in the reports provided above. We note that Figure 2 of the Pre-Submission Heslington Neighbourhood Plan currently shows York's draft Green Belt from the submitted Local Plan (2018). Should the Heslington Neighbourhood Plan be progressed in advance of the adoption of the York Local Plan then we would advise that a new map showing the 4<sup>th</sup> Set of Changes Green Belt boundaries is produced. This would allow the Neighbourhood Plan to continue to apply the approach to the identification of the green belt as currently set out in the RSS and the Fourth Set of Changes Local Plan (2005) on an interim basis until such time as the Local Plan is adopted.</p> <p>If the Heslington Neighbourhood Plan is progressed in tandem with or after the Local Plan is adopted then the current map in Figure 2 will be in conformity with the emerging Local Plan green belt boundary subject to any modifications agreed through the examination process.</p>	<p>It is anticipated the HPNP will be examined in advance of the emerging York Draft Local Plan and a new map showing the 4<sup>th</sup> Set of Changes to Local Development Plan (Green Belt boundaries)(2005) is now included. This would allow the Neighbourhood Plan to continue to apply the approach to the identification of the green belt as currently set out in the RSS and the 4<sup>th</sup> Set of Changes to Local Development Plan (2005) on an interim basis until such time as the Local Plan is adopted.</p>

Page	Policy/ Para./Section/Table/Map ref	Comments	ACTION / AMENDMENT TO PLAN
6 and 33	Paragraphs 5.1.1 and 11.2.2	<p>Information regarding the evidence of need for housing York's housing requirements needs to be updated in light of new evidence by consultants GL Hearn (please refer to the OAN wording below) which was submitted to the Planning Inspectorate on 29<sup>th</sup> January and was considered by the Councils Executive on 7<sup>th</sup> March 2019. Please refer to the link below for the full report:</p> <p><a href="https://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&amp;MId=10479&amp;Ver=4">https://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&amp;MId=10479&amp;Ver=4</a></p> <p><b>Objective Assessment of Housing Need (OAN)</b></p> <p>The Council's OAN (Objective Assessment of Housing Need) has been updated by consultants GL Hearn. The OAN uses the 2016 based sub-national population projections (SNPP) for York which show an average annual population growth over the period 2012 to 2037 of 24,036, significantly lower than the previous (2014 based) figure of 36,348 for the same period upon which the submitted Local Plan was based. GL Hearn's analysis of the components of population change suggest that the 2016 based population projections provide a more robust assessment of population growth for York than their predecessor which is also ratified by more recent population estimates in the Mid Year Estimates (2017, ONS). The main reason for this change relates to updated forecasts of international migration along with a downward trend in fertility rates and revised assumptions for increases in life expectancy. These population figures are then translated into household growth and a dwelling requirement using a range of assumptions on household representative rates and also including a vacancy rate of 3%.</p> <p>In accordance with National Planning Practice Guidance (NPPG) applied under transitional arrangements GL Hearn have then considered whether it would be appropriate to consider any uplifts to account for economic growth or to improve housing affordability (market signals). They have calculated the housing need required to meet an economic growth of 650 jobs per annum (based on the Local Plan target underpinned by the Employment Land Review Update, 2017). Using a series of assumptions including economic activity rates from the Office of Budget Responsibility (OBR) results in an economic led need for housing of up to 790 dwellings per annum.</p> <p>GL Hearn have also provided an updated analysis of housing market signals which show that house prices are relatively high in York and that housing affordability is a significantly worsening issue over the last five years. Affordable Housing needs remains at 573 dpa. In accordance with NPPG an uplift to improve affordability is required and considering the evidence GL Hearn proposes a 15% uplift. When applied to</p>	HPNP text amended in line with CYC recommendation to reflect updated position on housing numbers in York.

Page	Policy/ Para./Section/Table/Map ref	Comments	ACTION / AMENDMENT TO PLAN
		<p>the demographic starting point (484 dpa) this 15% uplift would result in an OAN of 557 dpa which is some way short of the economic led need of 790 dpa. The OAN in York is 790 dpa which would be sufficient to respond to market signals, including affordability adjustments as well as making a significant contribution to affordable housing needs.</p> <p>The updated OAN of 790 confirms to the Council that the robustness of submitted plans housing supply, based on the OAN of 867 dwellings per annum, is strengthened further by the reduction in the OAN. The submitted plans proposed housing supply can be robustly demonstrated to meet the revised OAN of 790 dwellings per annum both for the plan period (to 2033) and post plan period ( to 2038). The proposed housing supply in the submitted Plan will provide the required flexibility in order to be able to demonstrate that the Plan can respond to unforeseen circumstances over the duration of the plan period and to create a Green Belt boundary for York which will endure beyond the end of the plan period meeting longer term development needs.</p>	
31	Policy HES: 4 Sustainable Design Interpretation	<p>The City of York Council Statement of Community Involvement which was adopted in December 2007 relating to community engagement should be referenced as well as NPPF engagement.</p> <p><a href="https://www.york.gov.uk/downloads/file/1287/statement_of_community_involvement">https://www.york.gov.uk/downloads/file/1287/statement_of_community_involvement</a></p>	Noted and agreed. This source reference included in Plan text.
35	Policy HES: 7 New Housing Interpretation	The submitted Local Plan (2018) no longer uses the term that villages are 'washed over by the Green Belt. Please refer to Policy GB2. Heslington village exhibits a high degree of openness, and is considered to contribute to the openness of Green Belt. The reference should be altered to say that 'Heslington village is included within the Green Belt'.	Noted and agreed. Plan text amended accordingly.
35	Policy HES: 8 Housing Mix and Affordability	<p>The first Paragraph of the policy should also refer to the City of York Council Strategic Housing Market Assessment (SHMA) (2016 and 2017 update) evidence base document.</p> <p><a href="https://www.york.gov.uk/downloads/file/11251/strategic_housing_market_assessment_shma_2016">https://www.york.gov.uk/downloads/file/11251/strategic_housing_market_assessment_shma_2016</a></p> <p><a href="https://www.york.gov.uk/downloads/file/14277/strategic_housing_market_assessment_update_2017">https://www.york.gov.uk/downloads/file/14277/strategic_housing_market_assessment_update_2017</a></p>	Noted and agreed. This source reference included in Plan text.
38-50	<p>Section 12 Local Green Spaces Designation</p> <p>Section 13 Green Infrastructure</p>	<p>Happy to provide a map to show the draft Local Plan Open Spaces and the Locally Designated Open Spaces and differentiate these if this would be helpful. It would be helpful if the draft Local Plan Open Spaces/ Green Spaces/ Nature Conservation Sites could be renamed to be the same as the names specified in the Open Space and Biodiversity Audit which are Local Plan Evidence Base documents. This is for consistency where applicable. Please refer to the following link for the Councils Local Plan Evidence Base Studies:</p> <p><a href="https://www.york.gov.uk/downloads/file/16040/sd085_-_city_of_york_local_plan_evidence_base_-_">https://www.york.gov.uk/downloads/file/16040/sd085 - city of york local plan evidence base -</a></p>	Noted. Plan text amended to cross-reference CYC Open Space data, where sites are listed.

Page	Policy/ Para./Section/Table/Map ref	Comments	ACTION / AMENDMENT TO PLAN
		<a href="#"><u>open space and green infrastructure update september 2017</u></a> <a href="https://www.york.gov.uk/downloads/file/16047/sd089"><u>https://www.york.gov.uk/downloads/file/16047/sd089</u></a> - <a href="#"><u>city of york council biodiversity audit 2010</u></a>	
54	Section 14 Transport and Movement	City of York Council are happy to provide a consolidated map.	Maps updated with input from CYC.
57	Para 14.5 last paragraph	The construction of the new routes in relation to the A64 is also the responsibility of Highways England. Highways England should also be referenced.	Noted. Plan text amended to reference Highways England.
63	Policy HES:17 University of York	Final bullet point reference to paragraph required. Error message.	Noted and corrected.
66-67	Additional Guidelines	The Additional Guidelines are important, however as they are currently written we are unclear of the role of the guidance. We suggest that they are written into existing policies or new policies are created in their own right in the main body of the report which are positively prepared. Please refer to the table below.	Additional Guidelines (originally Section 16) have been deleted and relevant guidance is either included within Policy text or separate <i>Community Action</i> provisions.



### Proposed New Policies based on Additional Guidelines

NEW POLICY/ WITHIN EXSITING POLICY	PROPOSED WORDING	ACTION / AMENDMENT TO PLAN
Broadband	We recommend that the guidelines on broadband are incorporated into a new policy to enable them to have weight and be actioned through the planning process. The points being raised would fit well within a new policy. We are happy to discuss this with you further.	Important Additional Guidelines have been included within Policy or Community Action provisions and Section 16 deleted.
Signage and Street Furniture	We recommend that the guidelines on signage and street furniture are incorporated an existing policy to enable them to have weight and be actioned through the planning process. The points being raised would fit well within Policy HES: 4 Sustainable Design. We are happy to discuss this with you further.	
Lighting	We recommend that the guidelines on lighting are incorporated an existing policy to enable them to have weight and be actioned through the planning process. The points being raised would fit well within Policy HES: 4 Sustainable Design. We are happy to discuss this with you further.	
Transport	We recommend that the guidelines on Transport are incorporated an existing policy to enable them to have weight and be actioned through the planning process. The points being raised would fit well within the Transport policies. We are happy to discuss this with you further.	
Conservation Area	We recommend that the guidelines for the Conservation Area are incorporated into an existing policy to enable them to have weight and be actioned through the planning process. The points being raised would fit well within Policy HES: 4 Sustainable Design.	

NEW POLICY/ WITHIN EXSITING POLICY	PROPOSED WORDING	ACTION / AMENDMENT TO PLAN
Crime Prevention	We recommend that the guidelines on Crime Prevention are incorporated into a new policy to enable them to have weight and be actioned through the planning process. The points being raised would fit well within a new policy. We are happy to discuss this with you further.	
Building and Landscape Character	In relation to the Rufforth with Knapton Neighbourhood Plan and Earswick Neighbourhood Plan the Inspector has recommended that some policies which are not land use based should be made into non-land use 'Community Actions'. Community actions have been expressed by the Inspector as those which are not the remit of planning but fall into the remit/ambition of the Parish or neighbourhood Planning group. We advise that the wording specified in the Building and Landscape Character Section are named as community actions. We are happy to discuss this with you further.	
Elvington Airfield	We recommend that the guidelines for Elvington Airfield are incorporated into an existing policy to enable them to have weight and be actioned through the planning process. The points being raised would fit well within Policy HES: 7 New Housing. The policy should be consistent with Policy SS13 in the submitted Local Plan.	





Dear Sir/Madam,

### **Heslington Parish Neighbourhood Plan Pre-Submission Consultation Draft**

Thank you for the opportunity to comment on the pre-submission draft of the Heslington Parish Neighbourhood Plan.

We appreciate the amount of hard work and dedication that the Neighbourhood Planning Group has put into this process to produce a locally representative document, detailing the issues which affect Heslington Parish.

We also recognise that the absence of an up-to-date adopted York Local Plan and the timing of the emerging Local Plan may have proved problematic for you and we appreciate work undertaken in this respect.

We would like to continue to work closely with you to move this Plan forward in tandem with the production of our Local Plan resulting in the creation of two sound plans that fit together and serve the best interests of the people, environment and economy of Heslington and York as a whole.

This letter highlights those issues that we feel are fundamental to the success of the Neighbourhood Plan. We would like to work in partnership with you to address these issues ahead of the Plan's submission. A schedule identifying further comments/recommended amendments for the main document is enclosed with this letter.

#### Draft Green Belt

National planning policy (Paragraphs 83-85 of the 2012 NPPF and Paragraphs 136-139 of the 2019 NPPF) is clear that the identification and modification of green belt boundaries are matters for the local planning authority to determine. It goes on to state that these processes should be undertaken as part of the preparation or review of a local plan.

At present, York does not have an adopted Local Plan. In the meantime it is necessary for the Neighbourhood Plan to be in general conformity with the strategic policies of the development plan. Within this context the appropriate strategic Green Belt policies are the saved policies of the otherwise revoked Yorkshire and Humber Plan Regional Spatial Strategy (2008) (the RSS).

Until a Local Plan for York is adopted, development management decisions relating to proposals falling within the general extent of the Green Belt have and will be made on the basis that the land in question should be treated as Green Belt.

The Upper and Nether Poppleton Neighbourhood Plan, Rufforth with Knapton Neighbourhood Plan and Earswick Neighbourhood Plan have all been through Examination with an Independent Examiner. The Examiner's recommendations included in his reports included a series of modifications to the Neighbourhood Plans green belt policies to reflect the context of York Green Belt and background to the emerging Local Plan. Full copies of the Examiner's Reports are available via the links below:

[https://www.york.gov.uk/downloads/file/13410/examiners\\_report](https://www.york.gov.uk/downloads/file/13410/examiners_report)

[https://www.york.gov.uk/downloads/file/16753/rufforth\\_with\\_knapton\\_np\\_examiners\\_report](https://www.york.gov.uk/downloads/file/16753/rufforth_with_knapton_np_examiners_report)

[https://www.york.gov.uk/info/20051/planning\\_policy/1747/earswick\\_neighbourhood\\_plan](https://www.york.gov.uk/info/20051/planning_policy/1747/earswick_neighbourhood_plan)

In particular, the Examiner's modifications take account of national advice on the principle of the identification of detailed Green Belt boundaries whilst safeguarding the general application of this important and nationally-recognised planning tool.

The Examiner recommends that the neighbourhood plans continues to apply the approach to the identification of the Green Belt as set out currently in the RSS and the Fourth Set of Changes Development Control Local Plan (2005) on an interim basis until such times as the emerging Local Plan is adopted.

This will ensure that the preparation of the emerging Local Plan is used as the mechanism for the detailed identification of the York Green Belt boundaries in accordance with national planning policy. It will also provide full and proper opportunity for developers and land owners to contribute to this debate both in general terms and to provide the agreed levels of development for the City.

If the Heslington Neighbourhood Plan is submitted and examined in advance of the Local Plan being adopted then we would suggest that the same approach is taken with regard to the setting of an interim Green Belt boundary in the Heslington Neighbourhood Plan to that advised by the examiner in the reports provided above. We note that Figure 2 of the Pre-Submission Heslington Neighbourhood Plan currently shows York's draft Green Belt from the submitted Local Plan (2018). Should the Heslington Neighbourhood Plan be progressed in advance of the adoption of the York Local Plan then we would advise that a new map showing the 4th Set of Changes Green Belt boundaries is produced. This would allow the Neighbourhood Plan to continue to apply the approach to the identification of the green belt as currently set out in the RSS and the Fourth Set of Changes Local Plan (2005) on an interim basis until such time as the Local Plan is adopted.

If the Heslington Neighbourhood Plan is progressed in tandem with or after the Local Plan is adopted then the current map in Figure 2 will be in conformity with the emerging Local Plan green belt boundary subject to any modifications agreed through the examination process.

The City of York Local Plan has progressed significantly recently and was submitted for examination on the 25th May 2018. We support the Neighbourhood Plan and policies within it where they are in broad conformity with the approach set out in the emerging York Local Plan (Publication draft, February 2018).

### Strategic Environmental Assessment and Habitat Regulation Assessment

We welcome the production of a Strategic Environmental Assessment (SEA) Screening Report and Habitat Regulation Assessment (HRA) at the Pre-Submission stage detailing whether the plan is likely to have a significant or adverse effect on environmental, social and economic aspects of the plan area. We concur with the conclusions which have been reached at this stage of the process that there is not

likely to be significant (adverse) effects as a result of the plan. However, since the production of your SEA and HRA, we have completed a revised HRA for the Local Plan, which includes consideration of new evidence commissioned by the Council including a Visitor Survey for the Lower Derwent Valley Special Protection Area (SPA).

We recommend that the HRA should be updated to reflect this latest evidence prior to submission and we would be pleased to advise you on the additional changes required. In addition, should any significant changes to the plan be made as a result of the consultation, we would welcome a discussion to advise on updating both the SEA and HRA documents appropriately prior to Submission of the Neighbourhood Plan. We would also welcome you sharing with us the content of any applicable responses to the pre-submission in relation to these documents to enable us to advise you appropriately moving forward.

We welcome the significant progress made with the development of a Neighbourhood Plan for Heslington. We would welcome the opportunity to work with the Neighbourhood Planning Group to consider and address the comments made in this response and look forward to meeting with you on 19<sup>th</sup> March 2019. If you wish to discuss anything before this date please contact Anna Pawson in the Council's Strategic Planning Team.

**Yours Faithfully,**

*Rachel Macefield*

**Rachel Macefield  
Forward Planning Team Manager**

## **SECTION: 7 EDUCATION**

### **Para 7.1 Policy ED1 : University of York**

*Reference: [https://www.york.gov.uk/downloads/file/15869/cd001\\_-\\_city\\_of\\_york\\_local\\_plan\\_publication\\_draft\\_regulation\\_19\\_consultation\\_february\\_2018](https://www.york.gov.uk/downloads/file/15869/cd001_-_city_of_york_local_plan_publication_draft_regulation_19_consultation_february_2018)*

To ensure the continuing development of the University of York, the following range of higher education and related uses will be permitted on the University's campuses, as identified on the Proposals Map:

- academic, teaching, research and continuing professional development uses;
- housing for staff and students;
- arts, cultural, sports and social facilities ancillary to higher education uses;
- conferences;
- knowledge based businesses including research led science park; and
- any other uses ancillary to the university including support services for the uses identified above.

The University of York must address the need for any additional student housing which arises because of its future expansion of student numbers. Provision will be expected to be made on campus in the first instance. In assessing need, consideration will be given to the capacity of independent providers of bespoke student housing in the city and whether it is economically prudent to provide additional student accommodation.



Historic England

YORKSHIRE

Ms. Fiona Hill,  
Parish Clerk,  
Heslington Parish Council,  
The Byre,  
Field House Farm,  
Thornton-le-Clay,  
York,  
YO60 7QA

Our ref: PL00545626  
Your ref:  
01904 601 879  
Telephone 0755 719 0988  
Mobile

11 March 2019

Dear Ms. Hill,  
**Heslington Neighbourhood Plan**  
**Strategic Environmental Assessment Screening Opinion Consultation**

We write in response to your e-mail of Thursday 24 January 2019, seeking a Screening Opinion for the Heslington Neighbourhood Plan Preferred Options draft. For the purposes of this consultation, Historic England will confine its advice to the question, “Is it likely to have a significant effect on the environment?” in respect to our area of concern, cultural heritage. Our comments are based on the information supplied within the Heslington Neighbourhood Plan Preferred Options draft and associated documents.

The Heslington Neighbourhood Plan area is situated on the southern edge of York’s urban area and contains 2 grade II\* and 30 grade II listed buildings, 1 Registered Historic Landscape, 1 Scheduled Monument and Heslington Conservation Area. It will also have a number of locally important buildings, sites, areas and landscapes. Much of the Neighbourhood Plan area falls within York’s Green Belt.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of ‘SEA’ Directive], Historic England concurs with the conclusion of the Heslington Neighbourhood Plan SEA Screening Report, set out on pg. 21, para. 7.1, that the preparation of a Strategic Environmental Assessment is not required.

The views of the other three statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made. We should like to stress that this opinion is based on the information available in the Heslington Neighbourhood Plan Pre-submission draft attached to your e-mail.



Historic England, 37 Tanner Row, York YO1 6WP  
Telephone 01904 60 1948 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

We would be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Historic England strongly advises that the conservation and archaeological staff of the York City Council are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the HER (formerly SMR); how the policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of historic assets.

We look forward to receiving an invitation to comment upon the Heslington Neighbourhood Plan Submission in due course.

Thank you in anticipation.

Yours sincerely



Craig Broadwith  
Historic Places Adviser  
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