

Schedule of CYC Comments on the Draft Pre Publication Strensall Neighbourhood Plan.

Suggestions made in this schedule are based draft Strensall Neighbourhood Plan consulted on between 1st June-15th July 2018.. City of York Council look forward to commenting on future stages of consultation on the Neighbourhood Plan.

Please note that where possible, suggestions for deleted text use ~~strikethrough~~ and suggestions for new text are underlined.

Page/ reference	Comment/recommendation
General	We think the plan would benefit from a specific section identifying your overall aims and objectives for the Neighbourhood Plan and /or village. This would help to set the context between the issues you have identified in section 3.0 and the policies you are proposing in Section 4.
Sections 1.5-1.7	<p>This references previous consultation stages which have informed the production of the Neighbourhood Plan which is valuable information underpinning your decision-making.</p> <p>A consultation statement should be supplied alongside the submission of the plan and this information is integral to this. Some of this information may sit better in this standalone document in future iterations detailing your process of consultation. Further, the graph and outcomes of the business questionnaire could site in this document as this also forms part of a consultation exercise.</p>
Section 3.0	<p>This section seems to present the outcomes as a result of consultation. This section fits together with the preparatory consultation work for the Neighbourhood Plan and therefore could site as outcomes to this process in the Consultation Statement.</p> <p>Consider moving this to the Consultation Statement or background evidence as these represent the key issues that have arisen through consultation and research/knowledge which you want to address.</p>
Paras 3.8.2 – 3.85	Para 3.8.2 although correct could be reconfigured to acknowledged the nature conservation designations n order of their importance, i.e. to acknowledge that the Special Area of Conservation (SAC) is a European Designation recognising the importance of the heathland habitats as well as a nationally designation SSSI and partly an identified National Nature Reserve managed by the Yorkshire Wildlife Trust. It is also used partly as a military training area for the MOD.

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	<p>Para 3.8.3 – could make clear that it is jointly managed with the MOD currently.</p> <p>Para 3.8.5 – we recommend that this is modified or deleted. Firstly, we consider it premature to assume that management of the Common will transfer to an alternative owner at this stage. Secondly, any new management projects or projects which affect the Common will be subject to European law requiring Habitat Regulation Assessment to understand whether it would have significant effects on the common. In addition, where proposals relate to development or change of use and require planning permission, they would also require EIA in addition to HRA.</p>
Policy CP1	<p>It is advisable that applicants are able to demonstrate their requirements for parking. In light of this, we recommend that the final sentence is amended to: “ Development leading to the loss of existing parking spaces will not be allowed, unless alternatives car parking is provided within the same locality <u>or it is demonstrated that parking is not required.</u>”</p>
Policy CP2	<p>This policy refers to the Development Control Local Plan Appendix E: Car and Cycling Parking</p> <p>Please be aware that in the Publication draft Local Plan (2018) Policies T7 and T8 refer to the development of a new ‘Sustainable Transport for Development’ Supplementary Planning Document . In order to provide longevity to the plan, we consider that it would be worth amending to: “...Parking Standards (2005) <u>or any successor document.</u>”</p> <p>For clarity it would be beneficial to define the area called ‘the village’.</p> <p>This policy also seems to want to rectify the current parking issues by accommodating additional spaces in new development. This needs to be clarified. Our understanding currently is that this may be contrary to the above SPD as unless specified that additional public parking is required, additional parking for existing residents would not be provided in new schemes. Further, additional public parking on Queen Elizabeth Barracks, as identified, may cause serious conflict with the Local Plan policy for this site (SS19) and would need to be considered through the Habitat Regulation Assessment.</p>
Policy CF1	<p>We advise that some of the use classes identified in Table D need to be revised. We are happy to advise accordingly.</p> <p>Para 3 should be amended to: “Development will only be allowed in special circumstance and where it can be</p>

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	<p>demonstrated that:...”. It is our current opinion that the factors set out are adequate to demonstrating where development would be allowed. The application of ‘Special circumstances’ is onerous as these circumstances would need to be specified in addition to the criteria, which need to be demonstrated.</p>
Policy CF2	<p>This policy sets out the intentions of the Parish to designate further assets of community value. However it is not clear how this is applicable as a planning policy.</p> <p>It is recommended that this policy is amended to be a separate ‘Community Action’. Community Actions can be set out in the Neighbourhood Plan to indicate the intentions of the Parish or considerations outside of the planning process.</p>
Policy CF3	<p>We support the intention to identify Local Green Spaces. Please be aware that open space already identified on the Policies maps for the Local Plan should be distinguished separately as these are already designated as part of the Local Plan and associated evidence base. Local Green Spaces should be those in addition to the areas identified in the Local Plan.</p> <p>In addition, it is unclear to us which sites these are without a detailed map. We would be happy to work with the Parish to help create a detailed map, should this be of interest.</p>
Policy DH1 / DH2 – General	<p>Policies DH1 and DH2 seem to repeat themes. It would be worth exploring whether these can be brought together into one policy to ensure that issues are in one place. For example, each policy contains a section on ‘chimneys’ which should ideally be read together.</p>
Policy DH1 – specific points	<p>This policy states that the principles are based on the adopted Village Design Statement. It is unclear whether these principles are directly lifted from the VDS as the text is phrased as “<i>based on the VDS</i>”. This should be clarified. We recommend that you should consider positively amending the policy to state the following: “ To promote local distinctiveness, the following design principles are expected to be taken into account in the determination of planning applications. These are based on <u>set out in</u> the adopted village Design Statement should be followed, which has previously been prepared on behalf of the Parish Council. <u>Principally this requires the following:...</u>”</p> <p>Points 1 and 4 reference the Character Areas assessment prepared by consultants Woodhall Planning and Conservation. This should be annexed to the Neighbourhood Plan for ease of cross referencing.</p>

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Point 7 of this policy needs to be more specific regarding its requirements for both the landscaping and to what this refers to. It is not clear if this relates to all development requiring a garden, if you are referring to the difference between public and private spaces or incidental spaces. This point also needs considering in relation to point 19 as to whether they overlap. This point also lists best practice examples in the village considered to fulfil the requirements of this point. However, these examples should be incorporated into the justification section as they explain the policy point but do not in themselves form policy.

Point 8 seems to be complementary as an introduction to policy DH2. Consideration should be given to moving this point into DH2.

Point 10 of this policy repeats and may conflict with Policy CF2 regarding parking standards. It is recommended that the policy could cross reference to policy CF2 at the end of the policy.

Points 11 and 12 should be re-considered as currently there could be conflict between the two points. For example, point 11 considers that new building “should be environmentally future proof and must conform with City of York Council’s sustainability policy” but point 12 goes on to say that “Sustainable developments... should be encouraged on appropriate sites in the neighbourhood plan area”. One is “should be” and one is “should be encouraged”; although subtle, the second point is likely to be difficult to implement as it is encouraged not required. It may be better to consider rephrasing and aligning the points into one.

Point 11 references that brick work detail “in new development should not be *too elaborate* in quantity and mix”. Please note that this is very subjective and will be a case-by-case assessment based on the context of the property, in line with other points set out in this policy.

Point 13 regarding Affordable housing is not obviously relevant to a policy regarding Local distinctiveness. This could be put into a separate policy regarding affordable housing. Further, currently it would be difficult to implement as the policy is not specific with regards to how to define “an understanding of local need found within the Parish”. It is recommended that this is further defined if what you are seeking is a local provision first approach.

Point 16 states that chimneys should be encouraged. Whilst they can be encouraged, it may be more positive to

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	<p>state when and where they will be supported / not supported. For example, this may be rephrased to: <i>“Chimney stacks will be supported where they add visual interest to the roofscape”</i>.</p> <p>Point 17 refers to types of window replacement. Window replacements do not always require planning permission and properties within conservation areas or are listed buildings require specific consent / consideration in line with their designation. This part of the policy would only be implemented therefore, where planning permission is required. It would be beneficial therefore to insert at the beginning of this policy: <u>“Insofar as planning permission is required windows should...”</u></p> <p>Point 18 refers to privacy. We support this consideration but recommend that this is rephrased to more closely align with the NPPF definition relating to amenity and significance of harm to existing and future residents.</p> <p>Point 19 could be rephrased to be more specific about what is and is not allowed such as: <u>“<i>Subdivision of these spaces as a result of development will only be supported where it does not harm the character and visual amenity</i>”</u>. This point should also be considered in relation to point 7 of this policy. There are potential synergies between the two points and therefore the points could be considered together.</p> <p>Point 20 refers to the location of satellite dishes, which do not necessarily require planning permission. This policy would only be applied where planning permission would be required. It would be beneficial therefore to insert at the beginning of this policy <u>“Insofar as planning permission is required Satellite dishes should...”</u></p> <p>We will seek further comments from our Design, Conservation and Sustainable Development Team on this policy for further advice.</p>
Policy DH2	<p>We are concerned that parts of this policy conflict or are repetitive with points in policy DH1. See General comments above.</p> <p>Scale and massing Sentence starting “for example” should be removed. This would sit better in the justification relating to your rationale behind this point. The second paragraph starting “Developments within Strensall” seems to be a statement of fact and is not phrased to be used as policy. This point needs clarifying.</p>

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	<p>Layout This point needs clarifying. Currently, we consider that this covers all options and we do not understand the alternatives with regards to the location of development. The second paragraph starts with “in some circumstances it would be appropriate to incorporate grass verges adjacent to the highways”. However, it is not stated in what circumstances this would be acceptable. In order to be policy is you may wish to amend to something such as: “<u>Grass verges will be supported adjacent to the highways where...</u>”</p> <p>Materials Point 3 (pg 27) starting “ in some instance it may be appropriate...” should be clarified. You may consider it appropriate to rephrase to “<u>Decorative detailing to facades, particularly on gable ends, to avoid areas of unbroken walling will be supported</u>”.</p> <p>Openings This states that “All new openings are expected to be vertically proportioned”. In some cases, this may not be appropriate. To avoid conflict with other parts of this policy, together with parts of DH1, this should be considered in context on a case by case basis. This point therefore need clarifying.</p> <p>Fascias and rain water good We recommend the following change: “Within conservation areas metal rainwater goods and fascias will be encouraged <u>expected</u>”.</p> <p>Spaces The Second paragraph needs clarifying. Currently this states that development “will be resisted where development would interfere with the existing spatial qualities of the area”. The word “interfere” should be amended to “<u>be detrimental to</u>” or suchlike to better portray why development would be resisted.</p> <p>We will seek further comments from our Design, Conservation and Sustainable Development Team on this policy for further advice.</p>
Policy DH3	Whilst we support this policy, we consider that the language could be clarified in the second paragraph. Our suggestion is:

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	<p>“Where a shopfront has been insensitively altered it would be appropriate for it to be restored to its original appearance restoration to its original appearance will be supported, particularly within the Strensall and Towthorpe Conservation Area.”</p>
Policy DG1	The beginning part of this policy should be put into the policy justification. The policy should be the final paragraph only starting “Development within the Strensall Park area...”.
Policy DG2	The beginning part of this policy should be put into the policy justification. The policy should be the final paragraph only starting “Development within the Alexandra Road area...”.
Policy DG3	<p>The beginning part of this policy should be put into the policy justification. The policy should be based on the final paragraph stating for example <i>“Howard Road is identified on the proposals map for affordable housing, subject to local need being demonstrated”</i>.</p> <p>Please be aware that this site is currently within the general extent of the draft Green Belt as set out in the saved Yorkshire and Humber RSS policies and depicted in the Local Plan approved for Development Control purposes (2005). In line with previous neighbourhood plan examinations (Poppleton), the site allocation may be removed by a Planning Inspector until such time as the Local Plan is adopted given only the Local Plan can formally set the Green Belt Boundary. Further, if this was brought forward for affordable housing in advance of the Local Plan, exceptional circumstances would need to be proved in line with the NPPF as to why this site located in the draft Green Belt is required for development. In addition, this site is allocated through the Local Plan as housing allocation H59. This policy will need to accord with the planning policy in the draft Local Plan (2018).</p> <p>Further advice will be sought in relation to the allocating of this site for affordable housing.</p>
Policy DG4	<p>The first paragraph references buildings of historic interest. This should be placed as background information in the policy justification and the source of this data should be referenced.</p> <p>Further discussion is required in relation to how this policy aligns with Policy SS19 in the Local Plan. Serious conflict may arise in relation to the Habitat Regulation Assessment requirements for openspace with this approach. We will be happy to discuss this with you in more detail.</p>
Policy DG5	Further discussion is required in relation to how this policy aligns with Policy SS19 in the Local Plan. Serious conflict may arise in relation to the requirements set out and the Habitat Regulation Assessment with this approach. We will be happy to discuss this with you in more detail.
Community	We support the inclusion of community actions

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Actions	
Section 6	<p>This section refers to CIL. Please be advised that City of York Council have not yet decided on whether to implement CIL. Work on CIL has been undertaken in parallel to the Local Plan to help inform the decision making process. Further information on the current implications of this are set out in our evidence base: CD018: City of York Local Plan Viability Assessment Update Study (April 2018)</p> <p>https://www.york.gov.uk/downloads/file/15911/cd018_-_city_of_york_local_plan_viability_assessment_update_study_april_2018 .</p>