

City of York Local Plan: Further Sites Consultation, June 2014
Response by Escrick Parish Council
Re: Site 183: Land north of Escrick – proposed strategic housing allocation and safeguarded land

Introduction and background

Historically Escrick has been surrounded by Green Belt on all sides, to the north by the York Green Belt and to the west, east and south by the Selby Green Belt. Site 183 – land to the north of Escrick - is located within the York Green Belt which was specifically retained by the Secretary of State when the RSS for Yorkshire and the Humber was revoked. Historically the York Green Belt is known to extend around 6 miles around York and previous draft documents (adopted by City of York Council (YCC) for planning decision making purposes) showed it extending up to the edge of York's administrative boundaries with Escrick. This land and that adjoining has always been considered by York to be Green Belt for development control purposes – as shown by the recent consideration of both the North Selby Mine and petrol station expansion planning applications nearby – and YCC would have been open to judicial challenge on this issue had this not been the case. Whilst the Green Belt may need to be reviewed to find sites for both short term and longer term development needs, it is still considered that special consideration should be shown when taking land out of the Green Belt when judged against both brownfield and non Green Belt greenfield sites, and that sequentially more sustainable and less environmentally sensitive sites should be chosen in preference to Green Belt sites unless special circumstances exist. Also, in accordance with the NPPF, the optimum sustainable solutions to development needs must be found.

Escrick village encompasses 370 dwellings (2011 Census) and generally only small scale housing schemes (mainly infill plots and conversions) have been developed in recent history. It is appreciated that York has housing needs that need to be met in the optimum sustainable locations for York, and likewise Selby District will need to accommodate its own housing needs within its District. However, it should be noted that the majority of Escrick village is located within Selby District and, apart from a handful of houses, the garage and Sangthai restaurant that are within York, all of the remaining houses are in Selby District and all services are provided and maintained by either NYCC, Selby District Council or Escrick Parish Council to whom Council Tax is paid.

Following the publication of the Further Sites Consultation document by York - which due to an administrative mistake Escrick Parish Council was not consulted on - the Parish Council decided to undertake a full public consultation with all of the residents in the village to obtain their views on the proposals. A Consultation Notice describing the planning work being undertaken by both York and Selby Councils was hand delivered to all households, with a Feedback Form questionnaire attached requesting a response to the Parish Council. All information was also made available on the Parish Council website. A total of 112 Feedback Forms were received. The Parish Council's response was also debated at the recent well attended Parish Council meeting on 7 July 2014 when further representations were received from residents. This response by Escrick Parish Council sets out the views received from the local community and therefore represents Localism at its best. The Parish Council is aware that individual residents will also be submitting representations to City of York Council.

Summary of issues raised by respondees to the Feedback Form

Following Selby Council's adoption of the Core Strategy and the designation of Escrick as a Designated Service Village, there now appears to be a general acceptance and support that some additional housing would need to be accommodated in Escrick, both in the short-term and in the longer term. However, it was emphasised by most respondees that the quantity of houses developed must be appropriate to the size of the current village and level of services available, and should therefore be a far more reasonable number than that being suggested by YCC for Site 183..

The main issues of concern raised on the feedback forms were:

- Scale of development / retention of character of village - 51 comments
- Access and highways issues – 65 comments
- Drainage and flooding - 16 comments
- Capacity of local schools, doctors' surgery, general service availability - 37 comments
- Comments on sites proposed - 57 comments
- Duty to cooperate between Councils – implications for Escrick – 17 comments

Scale of development / retention of character of village:

The overwhelming comment was that Escrick is a village and should stay as a village. It was repeatedly stated that all of the sites proposed are too large and would completely change the village's character and would be overdevelopment in its rural setting. An increase of potentially 10% – 20% was seen as the maximum acceptable to the majority of people (ie 30 – 75 houses approx) over the total timescale of the Plan period as it was perceived that local services could scarcely cope with that level of growth, and that any growth permitted should be slow (ie phased) and proportionate.

Some respondees stated that no Green Belt land should be developed and that there are adequate brownfield sites available elsewhere (both in York and at North Selby Mine, where industrial traffic will now mix with residential). The amenity of Escrick must be protected and the gap between Escrick and Deighton should be protected and preserved.

It was felt that the scale of development being proposed by York was disproportionate both to Escrick and to other allocations to villages of similar size villages within York's jurisdiction. It was generally felt that York was 'dumping' its housing numbers on Escrick, yet would expect all its services to be provided by Selby. And when Selby also allocated a further housing site in Escrick, the scale of development for the village would be even more detrimental to its character.

Concerns relating to access and highways issues:

There is extensive concern that the A19 is already congested (especially at peak times) and that the roads would be unable to cope with any additional traffic from any major development. Existing lengthy tailbacks (especially at peak times) are expected to worsen when major developments at Olympia Park (Selby) and Germany Beck (York) commence, as well as smaller residential and commercial developments elsewhere on this route. The impact of lorries from the approved anaerobic digester at the North Selby Mine will compound existing traffic problems, as well as conflict/cause a danger for residential traffic and pedestrians (especially so if the green land is developed). Both York and Selby Councils should undertake a full Transport Assessment (cooperating jointly) to understand the real capacity of the A19 before any new development is proposed on this corridor, in order to mitigate air quality and traffic constraints on the network.

It is also already difficult to exit from the village onto the A19, and roads within the village can also be busy. Road improvements should include new traffic lights at the Skipwith Road junction, with better/safer pedestrian facilities along and across the A19 in appropriate locations within the village as extra traffic will cause additional hazard and noise and congestion for residents. Additional comments requested the bus service coming back into the village and more bus stops, as well as reductions in speed limits.

Drainage and flooding concerns:

A few respondees commented that upgrading of the existing drainage system would be essential for any development, and that existing services would not cope with the extra capacity needed. It was considered that any infrastructure must be improved prior to any development commencing.

It was considered that the flood risk maps must influence where development takes place, although this was only one consideration in choosing the best site. However, flooding within the village must not be allowed, and the flood plain protected if required to achieve this.

Capacity of schools, doctors' surgery, general service availability:

There was overwhelming concern that any development must be small scale or the schools, doctors' surgery and local amenities will be overloaded. There was doubt raised whether the primary school had the capacity to accommodate a large number of new pupils arising from any large scale development and that the character of the village school would be lost if it over-expanded (and who would pay for this). Also concerns raised regarding any potential change in catchment area of Fulford School and a commitment was wanted from York that this would not change as this would have a huge influence on the village.

In particular, the green site was considered inappropriate due to its remoteness from the primary school; it was considered that existing parking problems at the school would be exacerbated as it was too far from the primary school and also considered unsafe to walk children along the A19 to the school, and therefore parents would drive.

Comments on the York sites proposed:

In response to the question 'Do you support the allocation of the land hatched Green as a strategic site for housing in the York Local Plan?', 18 respondees said yes and 94 respondees said no. There is therefore overwhelming objection to the proposed allocation of the strategic housing site. In response to the question 'Do you consider that the land edged green and coloured Yellow should have housing built on it in the longer term?' (i.e. the proposed safeguarded allocation), 25 respondees said yes and 81 respondees said no. There is therefore again an overwhelming objection to the proposed allocation of the safeguarded site. Objections cited to the green land were mainly related to lack of connectivity with the rest of Escrick village and the distance to the primary school and main services / recreation facilities / community hub, which are mainly located in the southern part of the village. The proposed access is via the mine road and then the busy A19, which is too distant, is not pedestrian friendly and will encourage greater car use within the village to service these facilities. Other concerns included the erosion of the corridor between / potential coalescence with Deighton, and that the land is A1 arable / Green Belt and should not be built on.

There were strong views that York should build in its own villages, not dump its housing needs on Escrick, and that the allocation was political (i.e. no voters from Escrick so don't care). York will get

all the Council tax and Selby / Escrick will have to provide for all the services / needs and get the impact with no financial benefit to pay for them. If York did have the housing here, it must pay for improved facilities within the village, including pedestrian crossing across the A19, traffic lights at the Skipwith Road junction, improvements to the school, surgery and community facilities, maintenance of existing facilities etc. These people would be part of the Escrick community and York must pay for any improvements to Escrick's services and facilities required to accommodate them.

Duty to cooperate – implications for Escrick:

As outlined above, there was an overriding position that any expansion of Escrick should be considered as a whole, with the optimum site chosen irrespective of Council boundaries. Selby and York Councils must liaise on this and only the appropriate number of new homes for the village should be developed in the best location within it. Appropriate services, infrastructure and community facilities should be provided as part of any development, or monies available to Escrick for appropriate improvements. Respondee said that the Parish Council has no alternative but to treat the proposals as one and limit the total number of dwellings to the figure decided by them as sustainable.

Conclusion

Through undertaking a full and meaningful public consultation exercise, Escrick Parish Council has been given a clear mandate to object to the proposals by York to allocate the proposed strategic housing site and safeguarded land. It supports the views of the local community and does not object to the development of some additional housing but, as was emphasised by most respondees, the quantity of houses developed should be appropriate to the size of the current village and the level of services available – a 10% - 20 % increase – ie up to 75 new dwellings maximum for the whole of the Plan period for the **joint** allocation of both Councils – and therefore should be a more reasonable number. We also believe and support residents' view that any new dwellings provided should be to meet the needs of Escrick and that it would be unsustainable for York to meet its own needs by leapfrogging the Green Belt and then expecting people to travel back to York for its employment and wider services. Selby Council has advised us that, as the planning authority who has newly designated Escrick a Designated Service Village and within which the vast majority of the village is located, it intends to allocate a new housing site in its forthcoming Sites and Policies Plan later this year, and therefore Escrick would have sites allocated by both planning authorities if the York allocations are progressed, thus exacerbating residents' concerns regarding the appropriate sized and location of the expansion of the village.

The Duty to Cooperate must consider the best planning solution for the village as a whole, and must **not** be influenced by Local Authority boundaries. The attached map has been prepared to show all of the sites put forward for potential allocation for housing in the village to both York and Selby Councils. The concentric circles (at 200m intervals) show that the green land (York's strategic housing site, which must be accessed via the yellow land i.e. the safeguarded land – thus extending the journey time to it) is the furthest and **least** well related to the rest of the village and its heart. If Escrick is to be extended, there are appropriately sized portions of southern sections of either the red or blue / brown land that are far better related to the village centre that should be developed in preference to the green / yellow land. Good planning practice – and the Localism Act and Duty to Cooperate - dictates that the optimum site for the expansion of the village should be chosen, not one inconvenienced by Local Authority boundaries. It is obvious that the least sustainable and suitable location for the expansion of Escrick is to the north of the village – ie the furthest location from the village centre – but

the green (strategic housing site) / yellow (safeguarded land) sites are proposed here purely due to the fact that the northern edge is the only part of the village within York's area of jurisdiction.

Escrick Parish Council has resolved to investigate the potential of preparing a Neighbourhood Plan and the current proposed allocations by YCC would jeopardise that work. The proposals are premature, poorly related and ill-conceived in that there is no good planning reason as to why a village of only 370 dwellings should have land taken out of the Green Belt to provide a strategic (i.e. major) housing allocation that would increase its size by 50% - 75% imposed on it by YCC at this stage..... and that is before a further housing allocation is imposed by Selby District.

The local community has requested and the Parish Council has resolved that any expansion of Escrick should be considered as a whole, and this accords with good planning practice. Selby and York Councils must liaise on this as part of their Duty to Cooperate and only an appropriate number of new dwellings (we suggest an increase of 10% - 20% - ie 75 dwellings max) should be developed on a phased basis during the whole of the Plan period in the optimum location, close to the village heart and its services and facilities. Appropriate services, infrastructure and community facilities should be provided as part of any development, or monies available to Escrick for appropriate improvements.

We submit that the Technical Officer Assessment for Site 183 must be reviewed to consider all of the matters outlined above and others raised independently by Escrick residents. Once this is undertaken, we feel confident that, for good planning reasons, a substantial number of the Technical Officer's key Assessments will change to red and therefore the proposed allocations of Site 183 as a Strategic Housing allocation (green land) and Safeguarded (yellow) land will be rejected, in accordance with the Council's previous analysis of the site in 2013. Aside from YCC's pressing need to find more housing allocations to meet its housing needs, there are no changed circumstances that make the site any more suitable than previously and development here would completely adversely change the character and nature of Escrick village that the Green Belt in particular and Government advice seek to protect. Thus the proposed allocations should be deleted and the land retained within the York Green Belt (as per all of its previous planning history), with a more suitable and truly sustainable site within Selby District – of an appropriate scale - chosen in its place.

We object to these proposed allocations for these reasons.