

# BRITISH SUGAR/MANOR SCHOOL SPD CONSULTATION

## York Environment Forum Response

### "Vision and Objectives"

1-The Forum has previously commented at length at the issues and options stage of the York Northwest consultation, and is fully supportive of the CYC ambition to promote this site as an exemplar Urban Eco Settlement, which will *"contribute to the Council's aspiration for York to be a leading environmentally friendly city"*. The Forum is pleased to note that the former Manor School site is now included in this SPD.

2-This development provides an opportunity to demonstrate that the demanding and necessary targets for reducing carbon emissions and the city's ecological footprint in line with the 2020 and 2050 targets outlined in York's Sustainable Community Strategy can be achieved, while meeting the challenges of future climate change. Such a "mission statement" should be the bedrock on which all other aspirations are founded. Unfortunately the document fails to emphasise this, and we suggest that it should be incorporated in (4.1).

3- We are concerned over the inclusion of the narrow description *"...residential led..."* (4.1), with its implications of typical speculative housing development. The site must **not** be regarded as another anonymous suburb, where housing is provided initially and other amenities are built later, if at all. The site must be developed as an organic extension of the city, with its own name, distinctive identity, community facilities and local workspaces. As Alan Simpson states in his "YORK-NEW CITY BEAUTIFUL " report, the location of the site *".....provides the opportunity to create a new twenty-first century neighbourhood"*. We suggest that this section be re-worded to emphasise these points.

4- The reference to *"the scale of...the site"* (4.1) should be augmented by comparative figures for better comprehension of the opportunity facing the city. It is in fact larger in terms of developable area than York Central (42ha. as against 35ha.), with the potential to provide 1300 housing units, as against Germany Beck (700 units), and Derwenthorpe (500 units).

5- Figure 7 makes no reference to (a) the recognition of the natural environment, when open green space and significant planting should be acknowledged as being a key component of the "vision", or (b) the importance of a reduced eco-footprint. We suggest that these should be incorporated

### "Theme 1; Sustainable, Interactive and Inclusive Communities"

1- We welcome the confirmation that proposed density figures will be subject to considerations other than the prescriptive target of 40 units per ha. (5.20)(5.21). It may be that high densities, which could include flats, could apply to certain sectors, when this is compensated for by increasing the amount of open green space.

2- The suggestion that the option of a "*small supermarket*" be included (5.24) is not supported by those who wish to see the growth of individual enterprises such as those found in Fishergate or Bishopthorpe Road. The inclusion of a "*local food store*" (5.32) does **not** imply the introduction of a supermarket, and this appears to be confirmed at (5.37). Any convenience store would effectively preclude the success of small retail food outlets, and run counter to the expression of local identity which must underpin the development. A local police office, pub and post office should be added.

3- It is difficult to see how the requirement for an off-site contribution towards swimming facilities (5.33) benefits the site, unless it provides for transport to existing pools. The provision for a community bus, with associated running costs for a defined period, might be a sensible use of such funds. Third sector organisations could perhaps take on this provision.

4- The training and skills development proposals ( 5.40)(5.44) should be expanded into a **permanent** centre to cater for students at all levels, focussing on "green" technologies and concerns, expanding on courses already available within the city.

5- We can find no reference to the provision of broadband and other cable facilities to all built units, which should be included in the infrastructure from day one. Surely this would be an essential component of any "interactive and inclusive community".

## **"Theme 2: Quality Place/Environment"**

1- We do not understand why only a "*...significant proportion of development....*" will need to be subject to the mandatory Code for Sustainable Homes (6.3). This development must achieve the highest standards throughout if it is to be seen as an exemplar of good practice, and this statement should be deleted. Similarly the aspiration for the developer to build to the highest Code level is qualified by the phrase "*Where possible and financially viable...*". (6.4). Such a "get -out" clause will not contribute to the "*highest achievable standards of sustainability*" to which the Council aspires.

2- The Codes are flexible to the extent that it is possible to design to relatively modest energy efficiency targets and gain points by meeting other requirements. The target of meeting total energy needs by a 10% minimum renewables contribution is insufficiently ambitious. Surely a leading environmentally engaged city should be generating at least 50% of its energy through renewables? It is assumed, although not stated, that this covers all non-housing construction and street lighting, in addition to the housing (6.5). This should be clarified. The phrase "*.....subject to feasibility.....*" should be omitted, as it could allow developers to evade their obligations.

3- The site is projected to have " *a large and relatively stable heat load...*" (6.6). This will be an extended, relatively low density development phased in sections over eight years. In the early years it could not be served economically either by a CHP or district heating plant. It might be preferable to require highly efficient "Passivhaus" construction, at least in the early stages, and consider renewables as solutions which may be incorporated when technologies are more advanced. Retro-fit options are problematic and should not be considered.

4- "Statement 9" should be amended to read "*Regardless of any Urban Eco-Settlement funding.....*" and be redrafted to indicate that the highest standards will apply throughout the site. Similarly the reference to "*higher standards of sustainability in key areas...*" ( 6.8) should be omitted. We are not satisfied that the repeated references to special funding (6.9)(6.10) is appropriate. The development must not rely on public funds (either UK or EU) to establish performance benchmarks. This must be the responsibility of the developer.

5- Surprisingly there is no reference to "designing out" crime. This must be headlined, ideally in (6.19) and should also be noted in earlier sections dealing with objectives and masterplanning layout.

6- Pedestrian and cycle paths should be completely segregated from vehicular traffic (6.22). "*....wherever possible .....*" should be omitted.

7- We regard the provision of a significant green infrastructure as being a top priority, and welcome the recognition that this is given (6.25)-(6.35). A landscape strategy must be developed and advanced landscaping and planting undertaken covering the whole site, which must include maintenance and management from the outset. It should make a major contribution to the Council's emerging tree-planting programme. The local environmental and community groups which have local knowledge and skills should be involved in formulating this strategy . To implement a programme as the built phases are gradually developed is not the aim and would not achieve the most beneficial results. The whole of the site should be remediated and comprehensive landscape works initiated before any construction starts. We do not agree that "*....offsite provision may be more acceptable... for natural/semi-natural open space*" (6.28).

8- While the site may lie "*...adjacent to Local Green Infrastructure Corridors and a more significant regional Green Infrastructure Corridor...*" (6.30), it is essentially landlocked and cannot access them, bounded as it is by the railway to the northeast and the dense residential development and heavy traffic along the A59. The development must include as a minimum a pedestrian bridge over the railway onto Rawcliffe and Clifton Ings, giving access not only to open space but to pedestrian and cycle routes.

9- The Bee Bank has been identified as a SINC site (6.32). We propose that this area should be incorporated into a major nature reserve along the north-east boundary, established and managed by community groups, in accordance with the recommendations in the Northwest Area Action Plan Baseline Report, particularly (7.18). These recommendations should be included.

10- Every effort must be made to finalise the city's tree strategy (6.34) so that this can inform the master plan from the outset.

### **" Theme 3: Sustainable Movement and Connections"**

1- The Forum recognises the difficulty of reconciling the expectations of those who insist on using private cars with the environmental imperatives of reducing fossil fuel use with its consequent pollution, congestion and safety implications. It is essential that the CYC Transport Masterplan ( 7.2), with reduction in private car use as a top priority, is finalised so that the developer's masterplanning exercise can be completed.

2- We welcome the statements that immediate site infrastructure is essential (7.5)(7.20). The road, cycle and footpath network must be completed. If alternative movement modes are to have any chance of success these must be comprehensively available from the beginning, before incoming residents have had a chance to establish their own easy option of car travel. This may mean that public transport may be require considerable subsidy in the early years, and these costs must be recognised.

3- The proposal to restrict private car access via Plantation Drive and Ouseacres, while perhaps laudable in principle, would be unenforceable (7.14). The access through the former Civil Service site (figs.17,18) would require a c.p.o., as it is private land. The provision of a new pedestrian and cycle link as far as Water End (7.16, Fig.18) is problematic. It is not clear who is expected to fund this and its associated land aquisition costs. We have already referred to the provision of a bridge to the lngs as being a priority obligation.

4- There must be no reliance on tram/train solutions (7.18), although land could be reserved for such a possibility. The development could be completed well before such a concept could be brought on stream.

5- Low emission vehicles (7.33) have certain environmental advantages, but they do not necessarily reduce the city's carbon footprint because of their manufacturing and power supply needs. Their widespread introduction could in fact lead to more road congestion, and militate against any policy of modal shift away from the private car.

## "Delivery and Implementation"

1- In the list of Planning Application documents required (Fig.19), the Environmental Statement should include remediation proposals. The Green Infrastructure Strategy should include proposals for comprehensive advance landscaping.

2- The rate of construction envisaged is too slow (8.5), particularly when offsite fabrication will play an increasing role in house construction. Continental examples have been built far more rapidly. Speed of construction, allied to high quality, is needed if the city's pressing affordable housing needs are to be met.

3- We have already expressed concern over the inclusion of the notional demonstration exemplar project (8.6).

4- The road, cycle and footpath network must be provided as part of the first phase, and not be dealt with incrementally (8.8).

## CONCLUSION

The Forum considers this to be as comprehensive a document as can be expected at this stage, as this is not intended to be a detailed development brief. We feel that in some cases the text has not been sufficiently prescriptive, possibly leading to conflict between the perceived needs of the Council and a developer's legitimate interpretation of the requirements. Lessons need to be learned from the long-running saga of the Terry's site.

We are pleased to note that it answers many of the concerns expressed in our response at the Issues and Options stage.

While we recognise that it is important to illustrate the extent of public consultation, the document is aimed at potential developers and their partners, and the use of the heading "***You told us***" is inappropriate. We suggest "***The results of the public consultation exercise***" or similar wording would be preferable.