

YORK

CITY OF YORK
LOCAL PLAN
Regulation 22 (c) Consultation Statement Addendum
Proposed Modifications Consultation Report
September 2019

**City of York Local Plan Consultation Statement (Addendum)
Regulation 22(c) of the Town and Country Planning (Local
Planning) (England) Regulations 2012 (as amended).**

Proposed Modifications Consultation report (Sept 2019)

1. INTRODUCTION.....	2
2. PROPOSED MODIFICATIONS CONSULTATION PROCESS AND CONTENT	4
3. CONSULTATION REPORT STRUCTURE	10
4. CONSULTATION HIGHLIGHTS – SUMMARY IN BRIEF.....	11
5. MAIN ISSUES RAISED BY PRESCRIBED BODIES INCLUDING PARISH COUNCILS	16
6. MAIN ISSUES RAISED BY ADJACENT LOCAL AUTHORITIES.....	24
7. COMMENTS IN RELATION TO PROPOSED MODIFICATIONS PM1 TO PM46	26
8. COMMENTS ON THE PLAN-WIDE THEME – YORK’S FUTURE HOUSING REQUIREMENT.....	55
9. COMMENTS ON THE PLAN-WIDE THEME – REMOVAL OF QUEEN ELIZABETH BARRACKS, STRENSALL..	75
10. COMMENTS IN RELATION TO THE SUSTAINABILITY APPRAISAL/SEA ADDENDUM (JUNE, 2019) AND UPDATED HABITATS REGULATIONS ASSESSMENT (FEB, 2019).....	78
11. COMMENTS IN RELATION TO TOPIC PAPER 1: APPROACH TO DEFINING YORK’S GREEN BELT (ADDENDUM, MARCH 2019) AND ITS ASSOCIATED ANNEXES.....	81
12. MAIN ISSUES RAISED IN RELATION TO THE PLAN’S ALLOCATED SITES (NOT SUBJECT TO A PROPOSED MODIFICATION)	86
13. ALTERNATIVE SITES PROPOSED THROUGH CONSULTATION	111
14. ALTERNATIVE GB BOUNDARIES PROPOSED THROUGH CONSULTATION	180
15. GENERAL COMMENTS	241
ANNEX 1 STATEMENT OF REPRESENTATION PROCEDURE	
ANNEX 2 LIST OF PRESCRIBED BODIES AND PARISH COUNCILS	
ANNEX 3 COPY OF CONSULTATION LETTER	
ANNEX 4 COPY OF CONSULTATION COMMENTS FORM	
ANNEX 5 INDEX OF RESPONDENTS	
ANNEX 6 SUMMARY OF ALL COMMENTS RAISED, IN PLAN POLICY ORDER (published separately)	

1. Introduction

1.1 This Statement follows consultation on proposed modifications to the City of York Local Plan held between 10th June and 22nd July 2019. The proposed modifications and the supporting additional evidence address issues raised by the Inspectors in their initial observations on the submitted Plan, and further work undertaken by the Council since the Plan was submitted for Examination in May 2018. This relates to:

- the Council's proposed revised OAHN figure, the supporting evidence and subsequent proposed modifications to the submitted Local Plan suggested by the Council, including the Housing Needs Update by GL Hearn, dated January 2019 [EX/CYC/9], the proposed modifications schedule relating to the revised OAHN figure [EX/CYC/15], the SHLAA Figure 6 Update based on the revised OAHN figure [EX/CYC/16] and the updated Figure 5.1 and Table 5.2 Housing Trajectories based on the revised OAHN figure to 2033 [EX/CYC/17a] and to 2038 [EX/CYC/17b];
- the updated HRA, the supporting evidence and subsequent proposed modifications to the submitted Local Plan suggested by the Council, including the proposed deletion of sites, and policy relevant to, ST35 and H59 'Queen Elizabeth Barracks, Strensall'. This includes the updated Annex C – 'Lower Derwent and Skipwith Common Visitor Survey' of the HRA, dated 19 February 2019, [EX/CYC/14c];
- the proposed changes to the Green Belt boundary, the associated evidence and proposed modifications to the submitted Local Plan suggested by the Council. This includes the 'Addendum to Topic Paper 1 – The approach to defining York's Green Belt', dated March 2019 [EX/CYC/18] and the 'Addendum to TP1 Annex 6 – Proposed Modifications Schedule', dated March 2019 [EX/CYC/18a].

1.2 As with preceding Consultation Statements, this Statement has been prepared in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Its purpose is to show how we have met the legal requirements for consultation.

1.3 Regulation 22 (1) (c) requires a statement setting out:

- i) which bodies and persons the local planning authority invited to make representations under regulation 18;
- ii) how those bodies and persons were invited to make representations under regulation 18;
- iii) a summary of the main issues raised by the representations made pursuant to regulation 18;

- iv) how any of those representations made pursuant to regulation 18 have been taken into account;
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made in regulation 20, that no such representations were made.

1.4 This Statement provides an addendum to the submitted City of York Local Plan Consultation Statement (May 2018); it therefore does not restate its previously published summaries of consultation.

1.5 As with the Regulation 22(C) Consultation Statement (May, 2018), this statement is a factual representation of the consultation comments received. The Council do not wish to propose any further modifications at this time as no material new issues have arisen through the representations received through consultation.

2. Proposed Modifications Consultation Process and Content

- 2.1 The proposed modifications and the supporting additional evidence address issues raised by the Inspectors in their initial observations on the submitted Plan, and further work undertaken by the Council since the Plan was submitted for Examination in May 2018. The consultation ran for 6 weeks from Monday 10 June to midnight on Monday 22 July 2019.

Who was invited to make representations

Specific Consultees

- 2.2 Specific Consultees include Natural England, Historic England, the Environment Agency and Highways England, neighbouring authorities and parish councils. This group of consultees (approx. 100) was sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. A list of Prescribed Bodies and Parish Councils is contained in Annex 2.

General Consultees

- 2.3 All other consultees on our database, which includes anyone who commented on any previous stages of the local plan or has otherwise registered an interest in planning in York (approx. 10,000), were sent an email/letter informing them of the opportunity to comment and details of the web page and where to find more information. A copy of the letter is contained in Annex 3.

Wider public

- 2.4 A target social media campaign was undertaken to reach as many of the wider public in York as possible.

Internal Consultation

- 2.5 All Members, Directors, Assistant Directors and other relevant officers were sent details of the consultation and informed where they could view the documents.

2.6 Accessible Information

Key consultation documents were made available in accessible formats on request, including large print or another language.

Duty to Cooperate

- 2.7 Discussions with prescribed bodies or other organisations since the submission of the City of York Local Plan and as part of the proposed modifications consultation have been carried out as follows. The full extent of involvement under the Duty to Co-operate is set out in the Duty to Co-operate Addendum (Sept 2019).

- Highways England – 21 June 2018
- Highways England - 22 October 2018
- Natural England - 4 February 2019
- Leeds City Region Officer Group – 11 June 2019
- Leeds City Region Heads of Planning – 14 June 2019
- Natural England – 21 June 2019
- Historic England – 2 July 2019
- East Riding of Yorkshire Council – 5 July 2019
- Leeds City Region Directors of Development – 5 July 2019
- Hambleton District Council – 10 July 2019
- Highways England - 15 July 2019
- York, North Yorkshire, East Riding and Hull Heads of Planning – 19 July 2019
- West Yorkshire Combined Authority Place Panel – 30 July 2019

- 2.8 The Council met with, and facilitated a meeting between, the Defence Infrastructure Organisation (DIO) together with Natural England on 11 July 2019 to discuss the visitor survey evidence, the conclusions of the updated HRA and removal of site allocations ST35 and H59.

How people were invited to make representations

Media

- 2.9 A formal public notice in the York Evening Press was released signifying the start of the consultation in line with the Statement of Community Involvement. A Council press release was issued prior to the start of the consultation (Wednesday 6 June) publicising the 10 June start of the consultation. A York Press article has the potential to reach around 363,000 people.

NEWS

7th June

Have your say on York's Local Plan



RESIDENTS are being urged to have a say on York's Local Plan - which outlines where and what housing developments will be built in the city.

A six-week consultation has been launched on changes to the scheme - including the removal of two sites in **Strensall** and a reduction in the number of homes that should be built each year from 867 to 790. The council previously said hearings on the Local Plan would take place in early 2019.

CYC Website

- 2.10 A new 'Pre Inquiry Modifications' consultation page linked from the 'Current Consultations' section on the Council website homepage. The new webpage set out what the document is, listed the consultation documents and gave details of the consultation and how to respond. The existing 'New Local Plan' webpage was also updated with all of the consultation details, links to downloads and the online consultation form.

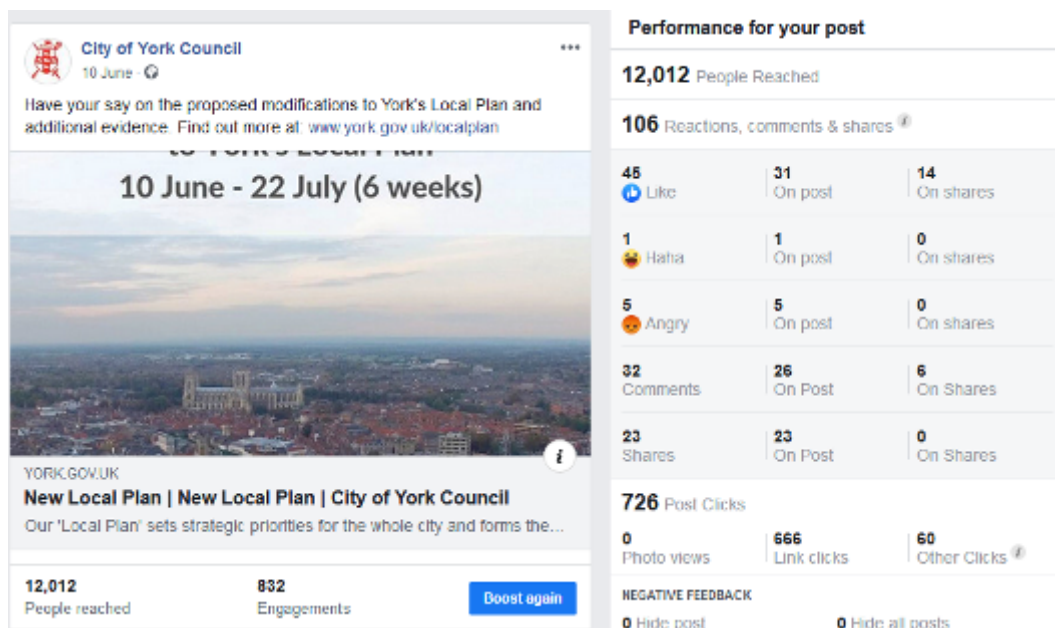
In summary, the New Local Plan landing page was viewed 5,431 times during the consultation, including 4,117 unique views. The New Local Plan Proposed Modifications Consultation page was viewed 3,118 times, including 1,731 unique views.

CYC Libraries and West Offices Reception

- 2.11 A full set of hard copies of all the consultation documents (main documents, background evidence and consultation material) was placed in West Offices Reception. A full set of hard copies of all the consultation documents (main documents, background evidence and consultation material) was placed in York Explore. The remaining libraries were provided with hard copies of the main documents and consultation material, alongside a cover sheet setting out how and where the background evidence documents could be viewed.

Twitter Feed/Facebook

- 2.12 The council's corporate social media accounts were used to publicise the consultation. Twitter/Facebook were used to publicise the start of the consultation and towards the end of the consultation period to make people aware that the deadline for comments was approaching. Video and image-led content emphasised the scope of the consultation and explained the process. In line with effective engagement strategies employed in previous consultations and campaigns, social media contexts were boosted to make sure they reached an audience beyond those already engaged with the Council. This included paid posts on Facebook which have been undertaken by the Council on other projects and proved helpful in generating interest and comment.



- 2.13 In summary, Facebook posts reached 21,589 users, engaging 936; Twitter reached 10,206 and engaging 143. This relates to likes, comments, shares or clicks on the content.

Council Intranet

- 2.14 Articles about the consultation were placed in the online internal council newsletter and home page throughout the consultation.

Method of Response

- 2.15 There were several ways in which people and organisations were able to comment on the consultation documents. These were by:

- filling in the comments form (available electronically on our website, and as hard copies at West Office reception and at all CYC libraries).

- using the Council’s online ‘Current Consultations’ tool and completing an online response form with questions accessed from the Council’s website.

A copy of the comments form is contained at Annex 4

Consultation Documents

- 2.16 All documents were available online on the Local Plan webpage and a full set of hard copies of all of the consultation documents were placed in West Offices Reception and the York Explore Library to be viewed. All CYC libraries held a hard copy of the main documents with a cover sheet listing the background evidence and how this could be viewed. All locations had consultation materials as set out below.

Main Documents

- City of York Local Plan Proposed Modifications (June 2019) [EX/CYC/20]
- Sustainability Appraisal/Strategic Environmental Assessment Addendum (June 2019) [CD009]
- Updated Habitats Regulations Assessment of the City of York Council Local Plan (February 2019) [EX/CYC/14c]
- City of York Local Plan Publication Draft (February 2018) to be read alongside the proposed modifications schedule only [CD001]

Background Evidence

- City of York Housing Needs Update (January 2019) [EX/CYC/9]
- Strategic Housing Land Availability Assessment Figure 6: Updated to 790 dwelling per annum Objectively Assessed Need [EX/CYC/16]
- Topic Paper TP1: Approach to defining York’s Green Belt Addendum (March 2019) [EX/CYC/18]
- Annex 1 [EX/CYC/18b]
- Annex 2 [EX/CYC/18c]
- Annex 3 [EX/CYC/18d]
- Annex 4 [EX/CYC/18e]
- Annex 5 [EX/CYC/18f]
- Annex 6 [EX/CYC/18a]

NB, Background evidence which has informed the Local Plan was published on a new evidence page webpage.

Consultation Material

- Comments form (electronic and hard copies)
- Statement of Representations Procedure (including Statement of the Fact)

Responses

- 2.17 During the Proposed Modifications consultation period we have received 216 responses from 176 individuals, organisations or interest groups; this equates to approximately 1,500 separate comments.
- 2.18 All comments made will be submitted to the Planning Inspectorate for examination and will be made available online on their authorisation.
- 2.19 A full index of all the respondents is contained at Annex 5, along with a Preferred Modifications Sequential Identification number (PM SID) which relates to their individual responses.
- 2.20 A Schedule of Representation in policy order, which contains a summary of each comment received, is contained at Annex 6. The summary of responses has been prepared by Officers to provide a guide to highlight the broad issues raised during this stage of consultation. It should not be taken as a substitute for the full and comprehensive set of all duly made representations. A full set of representations will be available to view via:
- the Examination library on the Council's Examination webpage (www.york.gov.uk/localplanexamination);
 - The Proposed Modifications Consultation webpage (https://www.york.gov.uk/info/20051/planning_policy/2370/new_local_plan_proposed_modifications_consultation); and
 - City of York Council Customer Centre, West Offices, Station Rise, York.

3. Consultation Report Structure

3.1 The following sections identify the main issues raised during Proposed Modifications consultation; in brief they include:

- 4. Consultation highlights**
- 5. Main Issues raised by Prescribed Bodies including Parish Councils**
- 6. Main issues raised by adjacent Local Authorities**
- 7. Comments in relation to Proposed Modifications PM1 to PM46 inclusive.**
- 8. Comments in relation to the Plan-wide Theme – York’s future Housing Requirement, including the City of York Housing Needs Update (Jan, 2019), and the Strategic Housing Land Availability Assessment (update to Fig 6)**
- 9. Comments in relation to the Plan-wide Theme – Removal of Strensall Barracks**
- 10. Comments in relation to the Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019).**
- 11. Comments in relation to Topic Paper 1: Approach to defining York’s Green Belt (Addendum, March 2019) and its associated Annexes.**
- 12. Main Issues raised in relation to the Plan’s allocated sites (not subject to a Proposed Modification)**
- 13. Alternative Sites proposed through consultation**
- 14. Alternative GB boundaries proposed through consultation**

3.2 These summaries have been prepared by Officers to highlight the broad range of issues raised during this stage of consultation. They should not be taken as a substitute for the full and comprehensive set of all duly made representations. A full set of representations will be publicly available via the Council’s Local Plan Examination webpage, Proposed Modifications Consultation webpage and at the City of York Council offices. Annex 6 to this report contains a summary of all comments raised, set out in Plan order.

4. Consultation highlights – summary in brief

- 4.1 176 individuals responded to the Proposed Modifications consultation, raising around 1,500 separate comments on the modifications presented and wider aspects of the Plan, including on allocated sites and further alternative sites and/or green belt boundary changes.

Comments from Prescribed Bodies – refer to Section 5.

Comments from adjacent Local Authorities – refer to Section 6.

York's Future Housing Requirement

- 4.2 Section 8 provides a summary of comments received in relation to the Plan-wide theme of York's future Housing Requirement, including to the Council's proposed revised OAHN figure, supporting evidence and subsequent proposed modifications.

Headline issues include:

- 4.3 No adjacent Local Authorities consider the Council's approach to be unsound. Both Ryedale District Council and Harrogate Borough Council reiterate the Leeds City Region and North Yorkshire Authorities agreement that each authority will meet its own housing needs within Local Authority boundaries;
- 4.4 A significant number of respondents consider the Housing Needs Update 2019 flawed and that the resultant housing requirement has been set too low, significantly lower than all previous estimates. Further, they consider that it does not meet 2019 NPPF methodology, deal adequately with housing affordability nor the Government's ambition to significantly boost housing construction. A number of submissions refer to alternative OAHNs, including:

SHMA Critique and OAN (Lichfields, 2019)

- OAHN of 790 is fundamentally flawed in terms of the demographic baseline. There are significant concerns regarding robustness of the 2016-based Sub –National Population Projections (SNPP). Demographic baseline should be revised from 458 to 921.
- GL Hearn's uplift is 15%; greater uplift of at least 20% would be more appropriate. When applied to 921 re-based demographic starting point this would indicate a need for 1,105 dpa.
- Given the substantial affordable housing need in York a further 10% uplift would be appropriate and should be applied to the OAHN, resulting in a figure of 1,215 dpa.
- A further 84 dpa is required for providing student accommodation.
- Rounded, this equates to a OAHN of 1,300 dpa between 2017-2033 (22% higher than MHCLG standard method of 1,069 dpa)

- Backlog of +285 dpa should be met.

Review of York's Housing Need (Hatch Regeneris, June 2019)

- HNU is silent on York's housing market area and the implications on the HMA of the new evidence it considers;
- HNU is not clear how the Plan aligns future housing and jobs
- Relies on short-term trends in 2016 projections as the basis for predicting future need
- Lack of transparency about assumptions used
- Higher market signals adjustment is justified: minimum should be 20%, although 30% would be consistent with new standard methodology.

Understanding Housing Needs in York (Understanding Data Ltd obo Langwith Development Partnership, 2019)

- Should 2016 projections be deemed appropriate to adopt as the starting point for calculating York's OAN, then they must be subject to adjustments to reflect economic growth, worsening trends of affordability and household formation.

4.5 Several alternatives to the Plan's housing requirements have been presented, which broadly include *(NB A full summary of responses received is included as Section 8.):*

- support to amend the OAN to 1,300 dpa (+285 shortfall), some 22% higher than MHCLG standard method.
- a minimum housing requirement of 1,025 (which, with economic adjustment) would take the OAN to 1,425 dpa.
- the Standard Method 1,070 dpa over the Plan period to 2037/38.
- Support for the modifications based on the HNU update.
- Individuals responding tend to support the lower OAHN, which is still considered too high in light of population projections emerging since submission.

4.6 Issues around the Housing Trajectory:

- Backlog (512 dwellings) should be annualised over the first 5 years of the Plan, and not over the Plan period.
- Several respondents suggest the trajectory is over-confident and raise concerns over overly optimistic lead-in times and delivery rates/density assumptions. Particular concerns raised about the over-reliance on large strategic sites (including York Central).
- Concerns raised about past housing delivery that includes off campus, privately managed student accommodation.

4.7 General

- The Plan should allow for further allocations, including for the employment land demand generated by increased housing growth.
- Safeguarded Land should be identified to accommodate development needs well beyond 2038; this is in line with previous Counsel opinion.

Removal of Queen Elizabeth Barracks, Strensall

- 4.8 Natural England, Highways England and Strensall and Towthorpe Parish Council, amongst others, support the removal of ST35 based on the outcomes of the Habitats Regulations Assessment.
- 4.9 The Defence Infrastructure Organisation object strongly to the removal of policy SS19 and sites ST35 and H59, which they consider is based on flawed evidence. DIO propose a number of alternative mitigation measures, including wardening and alternative open space provision to support the re-allocation of sites.

Topic Paper 1 – Approach to defining York’s Green Belt (Addendum)

- 4.10 There was a high volume of responses to the Plan’s inset of Elvington Village from the Green Belt, and the likely destructive impact from ST15 and H39 on Green Belt in the vicinity.
- 4.11 Concerns around the approach taken include:
- that the approach only includes a selective review of York’s Green Belt, carried out retrospectively to justify a pre-existing development strategy;
 - that the approach misconstrues NPPF, in that York is defining boundaries for the first time rather than excluding land from the Green Belt on the basis of ‘exceptional circumstances’;
 - the failure to provide ‘safeguarded land’ and deliver a permanent Green Belt;
 - that the tightly drawn Green Belt boundary does not allow for future provision of Gypsy and Traveller sites, contrary to policy;
 - similarly, the University of York and York St John University comment that the Plan does not meet demand for identified growth in the Universities;
 - the methodology has not been applied consistently and identifies land within strategically important areas of green belt for development.

Sustainability Appraisal

- 4.12 Historic England and Natural England welcome the updated SA and its content.
- 4.13 A number of respondents question the Plan's legal compliance, as it fails to properly consider reasonable alternatives and has therefore not been carried out in accordance with the legal requirements of the SA.

Comments on Proposed Modifications

PM10 Policy SS13 (ST15 – Land west of Elvington Lane)

- **Langwith Development Group** considers that the modifications render the Plan unsound, including in relation to the need for an appropriate assessment to be undertaken, that proposed nature reserve at OS10 is unrealistic and that they do not support the overall site boundary.

PM15 Policy SS20 (ST36 – Imphal Barracks)

- **Defence Infrastructure Organisation** request changes to the green belt boundary to exclude land on the east of the Barracks site from green belt.

PM26 and PM27 Policy GI 2 – Biodiversity and Access to Nature

- **Natural England** welcome clarification proposed but request policy goes further to provide detail on how net gains for biodiversity will be delivered.

PM36 – Policies Maps Green Belt boundary change at Little Hob Moor

- **Cllr Fenton** requests that Little Hob Moor remain in the Green Belt, retaining no less protection than the rest of Micklegate Stray.

PM39 – Policies Maps Green Belt boundary change at Strensall Village

- **Strensall and Towthorpe Parish Council** supports the green belt boundary change, with land to the south of Strensall included in the green belt.
- A number of other consultees, including **Wakeford Properties, Taylor Wimpey Ltd and Defence Infrastructure Organisation** consider the proposed modification renders the Plan unsound, that the justification is not transparent or applied consistently to alternative sites and that land now included within the Green Belt does not perform Green Belt purposes.

PM40 – Policies Maps Green Belt boundary change at Elvington Industrial Estate

- The **Lindum Group and William Birch and Sons** support the proposed modification, which they consider reflects circumstances on the group.

- A number of other respondents raise concerns that Elvington Parish Council have not been properly consulted on proposed modifications, or on the wider Plan.

PM41 Policies Maps Green Belt boundary change at Knapton

- **CPRE** support the washing over of Knapton Village.
- **Karbon Homes** and **Novus Investments** propose that Knapton is inset, rather than washed over, as the village lacks openness and surrounding land does not serve green belt purposes.

Sections 13 and 14 set out comments received in relation to proposed alternative sites and further modifications to the green belt.

5. Main Issues raised by Prescribed Bodies including Parish Councils

Prescribed Body	Main Issues Raised
York, North Yorkshire and East Riding Local Enterprise Partnership	No response received.
Leeds City Region Local Enterprise Partnership	<p>Satisfied the Local Plan meets all duty to cooperate requirements.</p> <p>Confirmed the Local Plan and the Proposed Modifications are in general conformity with the Leeds City Region Strategic Economic Plan and the principles of the West Yorkshire Transport Strategy.</p> <p>Note removal of ST35 and H59 but proposed modification not considered to significantly impact York's contribution to the collective City Region growth range ambition.</p> <p>Satisfied that the Local Plan is sound.</p>
West Yorkshire Combined Authority	<p>Satisfied the Local Plan meets all duty to cooperate requirements.</p> <p>Confirmed the Local Plan and the Proposed Modifications are in general conformity with the Leeds City Region Strategic Economic Plan and the principles of the West Yorkshire Transport Strategy.</p> <p>Note removal of ST35 and H59 but proposed modification not considered to significantly impact York's contribution to the collective City Region growth range ambition.</p> <p>Satisfied that the Local Plan is sound.</p>
Historic England	<p>Agree with the conclusions of the SA update screening process about which aspects of the Plan may need reviewing.</p> <p>Agree with the conclusions regarding the significant effects which the 'screened-in' modifications would be likely to have upon the historic environment.</p> <p>Detailed comments provided regarding TP1 Addendum around</p>

Prescribed Body	Main Issues Raised
	<p>how the special character and setting of the city has been reflected, how the NPPF purposes of the green belt have been interpreted and the detailed boundaries in a number of places around the city.</p>
Natural England	<p>Welcomes the revised Habitats Regulations Assessment and agrees with the revised conclusions and is satisfied in this context that the Plan is legally compliant.</p> <p>Concurs with the findings of the updated Habitats Regulations Assessment and welcome the proposed modifications to remove allocations ST35 and H59 along with supporting Policy SS19. Would be concerned if these allocations were retained in the Plan in the light of this evidence.</p> <p>Welcome clarification to Policy SS13, SS18 and EC1 which provides greater clarity regarding the necessary mitigation for allocations ST15, ST33 and E18.</p> <p>Satisfied that modification PM26 addresses the concerns raised regarding Policy GI2 in response to the publication draft of the plan.</p> <p>While the inclusion of criterion vii requiring developments to deliver net gain in Policy GI2 is welcomed, it is advised that the Council considers providing further details on how net gains for biodiversity will be delivered, either through the Local Plan or through supporting/supplementary plans and guidance.</p> <p>Welcomes the proposed inclusion of a target and indicator regarding pressures on Strensall Common SAC, Lower Derwent Valley SPA/SAC/Ramsar and Skipwith Common SAC.</p> <p>Welcomes the update SA.</p>
Highways England	<p>Removal of allocations should reduce the scale of impact on the Strategic Road Network.</p> <p>Still require details of any traffic mitigation required along the A64 and those which take account of proposed access arrangements to the Strategic Road Network for ST15.</p> <p>Currently building a traffic model in conjunction with City of York Council which should be available to assist with the assessment of the impact local Plan sites on the Strategic Road Network.</p>

Prescribed Body	Main Issues Raised
Environment Agency	No response received
The Coal Planning Authority	No specific comments to make.
Homes and Community Agency	No response received
National Grid	No response received
Network Rail	No response received
Yorkshire Water Services Ltd.	No response received
National Grid Property	No response received
York Teaching Hospital NHS Foundation Trust	No response received
Tees, Esk and Wear Valleys NHS Foundation Trust	No response received
Internal Drainage Board	No response received
North Yorkshire Police	No response received
Yorkshire Ambulance Service	No response received
Heslington Parish Council	<p>The Parish raised a number of concerns in relation to site allocations as follows:</p> <p><u>ST15 (Policy SS13)</u></p> <ul style="list-style-type: none"> • No evidence presenting preference for large development site in green belt over several smaller sites near existing settlements or why site size not reduced in light of lower OAN. • Evidence to outweigh threats to SSSI and SINC not provided, which is considered to require separate assessment.

Prescribed Body	Main Issues Raised
	<ul style="list-style-type: none"> • Precise status of OS10 remains unclear in relation to mitigation, use and green belt relationship. • Concerns raised regarding increase in traffic air and noise pollution as a result of ST27 & ST15. • Proposal for Langwith Stray/Long Lane and Common Lane to become combined pedestrian/cycle/vehicle track access for ST15 would be unworkable and unsafe. • Concerns regarding housing type to be provided and commuting patterns of residents. • Concerns regarding Heslington losing its identity. • Traffic implications for York on already overloaded local roads e.g. Fulford Road, Hull Road and the A64 • ST15 + OS10 is too large and takes too much productive Grade 2 agricultural land; should be smaller and make use of brownfield land. <p><u>Site ST27</u></p> <ul style="list-style-type: none"> • An up to date independent environmental assessment of ST27 required to consider loss of green belt, agricultural land and wild life habitation. • ST27 is an infringement of planning agreement to include a buffer between university and Heslington Village. • no evidence for demand for further employment site. • Contradiction for preference for settlement away from existing settlements and proposed ST27 noting that Historic England advocates university expansion at ST4, not ST27.
Strensall and Towthorpe Parish Council	<p>Consider the plan to be legally compliant and to comply with the Duty to Cooperate. In relation to soundness they:</p> <ul style="list-style-type: none"> • support PM 4 and PM 5, reducing the objectively assessed housing need from 867 to 790 homes per annum • support PM 13 and PM 19 (removal of policy SS 19 and deletion of the Queen Elizabeth Barracks site ST35 as a housing allocation for 500 homes) • support PM 17 (requiring that the allocation of site E 18 (Towthorpe Lines) as an employment site is accompanied by a comprehensive evidence base to understand and mitigate any possible effects on Strensall Common SAC/SSSI) • support PM 18 (removal of site H59 at Howard Road Strensall as a housing allocation for 45 homes). • support PM 39 (to move the outer edge of the Green Belt boundary to run along Ox Carr Lane, thus placing all land to

Prescribed Body	Main Issues Raised
	the south, including the entire Queen Elizabeth Barracks site, in the Green Belt)
Elvington Parish Council	<p>The Local Plan is unsound and does not reflect local public need or opinion and will adversely affect Elvington village; It should be rejected by the Inspectors. A summary of specific comments made include:</p> <p><u>TP1: Green Belt Addendum</u></p> <ul style="list-style-type: none"> • Methodology to Green Belt boundary assessment is wrong which makes the Local Plan unsound. • Disagree with the area proposed to be taken out of the Green Belt; To remove areas, other than the immediate locales of the business park, from the Green Belt will be damaging to the village, residents, economy and image of York. Previous Inspector considered Elvington should remain in the Green Belt. • There are three fundamental errors in the GB assessment of ST15 - the entire site is Green Belt and there is no brownfield land; the airfield is a nature conservation site; site visible from the A64. <p><u>Site ST26</u></p> <ul style="list-style-type: none"> • Supports ST26 as proposed for small, high value businesses consistent with a restriction to B1 and B8 use but need for detailed archaeological and ecological assessments before development and separation to existing Business Park. • Support is conditional on the imposition of a weight limit on Main Street (i.e. the road through the village centre) to alleviate concern regarding unacceptable HGV traffic passing through the village. <p><u>Site H39</u></p> <ul style="list-style-type: none"> • Object to inclusion of H39 as serves Green Belt purposes and traffic concerns; would prefer former H26 'Dauby lane'. <p><u>Showpersons site</u></p> <ul style="list-style-type: none"> • There are no special circumstances to justify removal of this site from the Green Belt. The previous Planning Inspector's report was very clear which the council should abide by. <p><u>Site ST15</u></p> <ul style="list-style-type: none"> • ST15 is too close to the villages of Elvington and Wheldrake and disproportionate in size; preferred earlier version of ST15 as 'Whinthorpe' being closer to the A64 which has less impact on villages and ecological designations. • Concerned with lack of information provided regarding new

Prescribed Body	Main Issues Raised
	<p>infrastructure – particularly the transport links to the A64 and B1228.</p> <ul style="list-style-type: none"> • Object to loss of Elvington Airfield due to historic importance and recreational use as well as potential adverse impact on the Yorkshire Air Museum and Allied Air Forces Memorial.
Fulford Parish Council	<p>Fulford Parish Council do not consider the plan sound and submitted a substantive response to the consultation. Specific comments included:</p> <p><u>Sustainability Appraisal</u></p> <ul style="list-style-type: none"> • Conclusion in the SA cannot be justified as it does not appraise all reasonable alternatives to the 790 dpa requirement or decision not to reduce the amount of the proposed housing supply in the light of a lower OAN. • Fails to recognise the environmental harm which will be caused by the deletion of ST35 for housing development and its inclusion within the Green Belt. <p><u>Housing Requirement and Housing Needs Update</u></p> <ul style="list-style-type: none"> • The GL Hearn report is not sound and over-estimates the OAHN for the city over the plan period and beyond. Support OAHN derived from the 2016-based SNHP (plus 10% for market signals) equalling 532dpa. • Disagree with the methodology used including <ul style="list-style-type: none"> ○ Departure from the 2016 projections for the demographic starting point is not justified. ○ Market signals adjustment is not appropriate; should be 10%, as recommended by GLH in its SHMA Update (Sept 2017). ○ Disagree with Council's position on inherited shortfall; ○ Disagree that presented over-supply in the plan period is necessary to meet the assessed housing needs up to 2037/38; ○ Question the inclusion of a 10% non-implementation rate on permitted applications as not presented in submitted Plan; no justification for change in approach. • Consider OAHN should not be fully met if it causes significant harm to the setting and special character of York or other green belt purposes. This should have been considered before determining land requirements. • Clarity required in relation to the four different trajectories and how they are intended to relate to each other.

Prescribed Body	Main Issues Raised
	<ul style="list-style-type: none"> • Concern that lack of any phasing of green field allocations in the Local Plan could lead to all the allocated housing land (including for the post-plan period) being developed by 2033. <p><u>Queen Elizabeth Barracks, Strensall</u></p> <ul style="list-style-type: none"> • Object to removal of ST35 from Plan; not justified and should be allocated for housing as most appropriate form of development. If vacant, contrary to brownfield first policy. Appropriate mitigation at Strensall Common SAC could ensure that there would be no adverse effect on the integrity of the European site. <p><u>TP1: Green Belt addendum</u></p> <ul style="list-style-type: none"> • Disputes validity of voluminous new evidence after the submission of the Plan. • TP1 Addendum flawed; A comprehensive appraisal of which areas of land make a significant contribution to Purpose 4 as a primary purpose has not been undertaken. Therefore not properly considered which areas of open land make important contributions to Green Belt purposes required to be kept permanently open; Does not identify the importance in its entirety of the buffer of open land which encircles the City between the Outer Ring Road and the existing urban edge • Disagree with sustainability as a good indicator of whether development would constitute “unrestricted sprawl”; better understood as seeking to prevent the development of land which is not well-related to the existing urban pattern. • Boundaries in Figure 5 appear arbitrarily drawn and exclude land which fulfils a separation purpose. • Clarity is required to understand how Figure 7 has been derived. • Agrees that the Council must demonstrate exceptional circumstances to justify altering the general extent of the Green Belt but Council have failed to demonstrate this or to justify the Local Plan’s proposed Green Belt changes given the quantum of housing released proposed from the Green Belt has not been justified and no exploration of alternative approaches to meeting need is presented. • Annex 4 is flawed in its approach; • Disagree strongly with evaluation in Annex 4 of McArthur

Prescribed Body	Main Issues Raised
	<p>Glen Outlet which should have been identified as a developed site to be washed over by Green Belt and subject to NPPF paragraph 89.</p> <ul style="list-style-type: none"> • Annex 5 applies criteria set out in Section 4 of the main Addendum, which is flawed and therefore the appraisals of the individual sites are flawed and cannot be relied upon. • Figure 6 regarding Green Infrastructure is of little or no value to defining Green Belt boundaries important to Purpose 3.
Copmanthorpe Parish Council	<p>The modified plan has been prepared in line with statutory regulations, the duty to cooperate and legal procedural requirements.</p> <p>The lower OAHN is welcomed but is still considered too high in light of population projections emerging since the original plan submission in May 2018.</p> <p>The reduced OAHN offers scope for reducing development at ST31. The densities should be reduced to those set out in the Copmanthorpe Neighbourhood Plan.</p> <p>The reduced OAHN offers scope for reducing development at H29. The densities should be reduced to those set out in the Copmanthorpe Neighbourhood Plan.</p>

6. Main issues raised by adjacent Local Authorities

Local Authority	Main Issues Raised
Ryedale District Council	<p>The District Council fully understand the reasons why land at Strensall is proposed to be removed from the plan and has no objection to this.</p> <p>Notes the proposed modifications to reduce the OAN and the policy mechanism to address historic under delivery.</p> <p>The District Council reiterates its position that the City should meet its own housing needs and has no comments or objection to the proposed modification to the OAN.</p> <p>It will be vital that the City responds to any future under delivery accordingly.</p>
Harrogate Borough Council	<p>There is agreement amongst the Leeds City Region Authorities and North Yorkshire Authorities that each will plan to meet their housing needs within their own local authority boundaries.</p> <p>Harrogate Borough Council is planning to meet in full its objectively assessed need, it is not making provision to deal with undersupply elsewhere.</p> <p>City of York Council will need to satisfy itself that, in light of its refreshed evidence on housing need, the City of York Local Plan will meet the tests of soundness.</p> <p>Harrogate Borough Council has previously raised concerns regarding the longevity of the Green Belt boundary.</p> <p>City of York Council will need to satisfy itself that the approach it is taking will meet the tests of soundness.</p>
Selby District Council	<p>Satisfied that the amended housing figure is underpinned by robust evidence in the form of the updated SHMA which has applied an uplift to take account of economic growth.</p>
Hambleton District Council	<p>Having reviewed the York Green Belt methodology, the revised OAHN for York, the updated Habitats Regulation Assessment and the Proposed Modifications to the local plan and Sustainability Appraisal, confirm that the District Council has no issues to raise with any of these.</p>

Local Authority	Main Issues Raised
East Riding of Yorkshire Council	<p>No objection to the findings of the updated HRA. Would be helpful to include explanation on how the HRA has considered Likely Significant Effects alone and in-combination where necessary and how these have been screened out to allow a clear record of how the HRA has reached its conclusions.</p>
North Yorkshire County Council	<p>Do not wish to question the annual housing provision. It is important that the Local Plan provides sufficient flexibility to enable City of York to deliver its objectives and to fulfil its role as a key economic driver over the plan period and beyond to ensure that York can continue to meet its identified housing needs.</p> <p>Recognising the Plan makes allocations for five years beyond the plan period it is important to make sure that the Plan makes sufficient provision to safeguard land needed to meet the city's growth well beyond the plan period and prevent any future growth detrimentally impacts on services and infrastructure within the County.</p>

7. Comments in relation to Proposed Modifications PM1 to PM46

PM1 – Whole Plan reference change: Proposals map to Policies map [Clarify titles of map from ‘proposals map’ to ‘policies map’]

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No Comments

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No Comments

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No Comments

Modifications

Proposed modifications include:

- No Comments

PM2 – Removal of Deleted Policies from Contents Page [Removal of references to Policy SS19 & Site Allocation ST35]

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. **Refer to Section 9.**

PM3 – Explanation of City of York Housing Needs [Alignment with updated housing requirement evidence HNU January 2019 by GL Hearn]

Note that comments have been summarised in relation to the Plan-wide theme around the City’s housing requirement. **Refer to Section 8.**

PM4 – Policy SS1: Delivering Sustainable Growth for York – Policy
[Alignment with updated housing requirement evidence HNU January 2019 by
GL Hearn]

Note that comments have been summarised in relation to the Plan-wide theme around the City's housing requirement. Refer to Section 8

PM5 – Policy SS1: Delivering Sustainable Growth for York – Explanation
[Alignment with updated housing requirement evidence HNU January 2019 by
GL Hearn]

Note that comments have been summarised in relation to the Plan-wide theme around the City's housing requirement. Refer to Section 8

PM6 – Policy SS10: Land North of Monks Cross
[Removal of reference to ST35 following removal of Policy SS19]

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. Refer to Section 9

PM7 – Policy SS12: Land West of Wigginton Road
[To correct the roundabout name referenced]

Note: comments received in relation to the Policy and/or site have been summarised as part of Section 12.

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No comments.

Respondents that consider the plan unsound in regards to this modification and/or theme:

<ul style="list-style-type: none"> No comments.
Modifications
<p>Proposed modifications include:</p> <ul style="list-style-type: none"> No comments.
Suggested Alternative Boundary
<ul style="list-style-type: none"> No comments.

**PM8 – Policy SS12: Land West of Wigginton Road
[Removal of reference to ST35 following removal of Policy SS19]**

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. **Refer to Section 9**

**PM9 – Policy SS13: Land West of Elvington Lane
[To clarify that the open space is not shown on the policies map]**

Note: comments received in relation to the Policy and/or site have been summarised as part of Section 12.

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No comments

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No comments.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- Heslington Parish Council** Recreational access to OS10 needs clarifying; it is understood that OS10 will be for mitigation for recreational visitors but the effects/ mitigation in relation to recreational access to existing open access

land and footpaths needs clarifying.
Modifications
Proposed modifications include: <ul style="list-style-type: none"> • No comments.
Suggested Alternative Boundary
<ul style="list-style-type: none"> • No comments.

**PM10 – Policy SS13: Land West of Elvington Lane
[Clarify the link to new open space (OS10) as detailed in the HRA 2018]**

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- Believes Plan to be legally compliant
- Believes CYC are trying to ease their guilty conscience and buy off any environmental lobbyists.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **Natural England** welcomes this clarification regarding the necessary mitigation necessary for ST15.
- Considers Local Plan to be sound

Respondents that consider the plan unsound in regards to this modification and/or theme:

- **Heslington Parish Council** Recreational access to OS10 needs clarifying; it is understood that OS10 will be for mitigation for recreational visitors but the effects/ mitigation in relation to recreational access to existing open access land and footpaths needs clarifying.

- OS10 should remain in agricultural use.
- Buffer zone OS10 does not extend to the SW of the proposed ST15. There is no consideration of the effect of water runoff from ST15 towards the Tillmire.
- OS10: New area for nature conservation on land to south of A64 in association with ST15 - surely taking more agricultural land out of production will only make matters worse in a fragile political situation especially re Brexit and food imports. There are just too many environmental circumstances to reconsider
- **Langwith Development Group** note there is insufficient detail provided for ST15 to determine the likely significant effects on the Lower Derwent Valley SPA as well as the Heslington Tillmire SSSI. ST15 and ST33 could undermine conservation objectives for the breeding and non-breeding birds of the Lower Derwent Valley and that a likely significant effect cannot be ruled out - policy must be screened in and an appropriate assessment is required. Consider the promotion of OS10 for both recreation and compensation for loss of biodiversity to be two incompatible objectives. Notes that the proposed access road will also go through OS10. Considers the delivery trajectory to be unrealistic - earliest homes could be delivered by 2022/23 and average annual delivery rate to be overly ambitious. Site boundary is unsound and this site in conjunction with others cannot meet York's true housing need.
- Suggested nature reserve at OS10 is laudable but misguided as proximity to new development with the attendant noise / air / light pollution will harm wildlife as will all the cats / rats / foxes that will be attracted to the new development.

Modifications

Proposed modifications include:

- Wants OS10 to remain in agricultural use.
- A full environmental impact assessment is needed for ST15 on its impact on the Tillmire, including water runoff.

Suggested Alternative Boundary

- Buffer zone OS10 should be extended to the SE to include all greenfield land between ST15 and the Tillmire

PM11 – Policy SS13: Land West of Elvington Lane
[Removal of reference to ST35 following removal of Policy SS19]

Note: comments received in relation to the Policy and/or site have been summarised as part of Section 12.

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No comments

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments

Modifications

Proposed modifications include:

- No comments

PM12 - Policy SS18: Station Yard, Wheldrake
[Clarify the mitigation required as detailed in the HRA 2018]

Note: comments received in relation to the Policy and/or site have been summarised as part of Section 12.

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- The proposed amendment appears appropriate provided it is necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and kind to the development.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **Natural England** welcomes this clarification regarding mitigation necessary for avoiding adverse effects on the integrity of the Lower Derwent Valley SPA/Ramsar/SSSI.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments.

Modifications

Proposed modifications include:

- No comments.

Suggested Alternative Boundary

- No comments.

PM13 – Policy SS19: Queen Elizabeth Barracks, Strensall

[Policy and site removed following the outcomes of HRA February 2019]

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. Refer to Section 9

PM14 – Policy SS19: Queen Elizabeth Barracks, Strensall

[Policy and site removed following the outcomes of HRA February 2019]

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. Refer to Section 9

PM15 – Policy SS20: Imphal Barracks

[Correction of developable area and housing number]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No comments.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- **Defence Infrastructure Organisation** support the allocation of the site but consider the way the green belt boundary is defined in the vicinity of this site to be erroneous. Walmgate Stray may play a role in preserving the setting of historic York, but the developed parts of the Barracks do not; because the Barracks is already developed. Using Green Belt policy to prevent redevelopment would not encourage further urban regeneration. This land is not open and is not characteristic of Green Belt.

Modifications

Proposed modifications include:

- **Defence Infrastructure Organisation** consider the way the green belt boundary is defined in the vicinity of this site to be erroneous. The allocation should be extended / Green Belt boundary should be redrawn to the east around the designation for Walmgate Stray.

Suggested Alternative Boundary

- **Defence Infrastructure Organisation** request the green belt's inner boundary is redrawn around Walmgate Stray immediately to the east of the site, allowing a larger developable area.

See Section 14 which sets out the extent of further GB modifications identified as part of this consultation.

PM16 – Policy EC1: Employment Allocations

[Footnote referral to Policy GI2 following removal of Policy SS19 and Site ST35]

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- Seems to be legally compliant to respondent

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **Natural England** - Welcomes the proposed requirements for Strensall Common SAC for allocation E18
- **Strensall & Towthorpe Parish Council** – Supports that E18 has comprehensive evidence base to understand and mitigate effects on Strensall Common SAC/SSSI

Respondents that consider the plan unsound in regards to this modification and/or theme:

- **Defence Infrastructure Organisation** – Additionally explanatory text to Policy EC1 is not necessary as planning applications will have regard to all statutory and Government policy requirements.

Modifications

Proposed modifications include:

- No Comment

PM17 – Policy EC1: Employment Allocations

[Explanatory text to ensure E18 is considered in relation to Strensall Common SAC]

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No Comment

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **Natural England** - Welcomes the proposed requirements for Strensall Common SAC for allocation E18
- **Strensall & Towthorpe Parish Council** – Supports that E18 has comprehensive evidence base to understand and mitigate effects on Strensall Common SAC/SSSI

Respondents that consider the plan unsound in regards to this modification and/or theme:

- **Defence Infrastructure Organisation** – Additionally explanatory text to Policy EC1 is not necessary as planning applications will have regard to all statutory and Government policy requirements.

Modifications

Proposed modifications include:

- No Comment

PM18 – Policy H1: Housing Allocations (H59)

[Site removed following the outcomes of HRA February 2019]

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. Refer to Section 9

PM19 – Policy H1: Housing Allocations (ST35)

[Site removed following the outcomes of HRA February 2019]

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. Refer to Section 9

PM20a to PM20d – Policy H1: Housing Allocations

[Align housing trajectory with updated evidence from HNU January 2019 by GL Hearn]

Note that comments have been summarised in relation to the Plan-wide theme around the City's housing requirement. Refer to Section 8

PM21a to PM21d – Policy H1: Housing Allocations

[Align housing trajectory with updated evidence from HNU January 2019 by GL Hearn]

Note that comments have been summarised in relation to the Plan-wide theme around the City’s housing requirement. Refer to Section 8

PM22 – Policy H1: Housing Allocations Explanation

[Align with updated evidence from HNU January 2019 by GL Hearn]

Note that comments have been summarised in relation to the Plan-wide theme around the City’s housing requirement. Refer to Section 8

PM23 – HW1: Protecting Existing Facilities

[Text to add clarity and to better reflect NPPF definition]

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No Comments

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No Comments

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No Comments

Modifications

Proposed modifications include:

- No Comments

PM24 – Policy D1: Placemaking

[Clarify that, as part of planning process, residential amenity should be considered as part of overall design standards]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No Comment

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No Comment

Respondents that consider the plan unsound in regards to this modification and/or theme:

- **Heslington Parish Council** – Increase in traffic, air and noise pollution by ST15 and ST27 sites into greenfield land
- ST15 should not cause noise pollution and amenity loss for nearby residents

Modifications

Comments from specific bodies:

- No Comment

PM25 – Policy D4: Conservation Areas

[Clarify all planning applications should consider conservation areas]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- National Inspector has requested resubmission of draft Local Plan for consultation and this is being done

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No Comment

Respondents that consider the plan unsound in regards to this modification and/or theme:

- H39 is not listed as a modification of the green belt.
- Exceptional circumstances for releasing land are not justified for H39 being an area of openness in a conservation area.
- Opposes the removal of green belt status in Elvington.
- Alternate housing site H26 is preferable
- **Northminster Ltd. / Joseph Rowntree Housing Trust / William Birch & Sons Ltd.** – Assessing impact of development in conservation areas usually requires detailed design, so CYC is changing policy by releasing greenfield land without full design details.

Modifications

Proposed modifications include:

- CYC to reinstate H26 for housing
- Restore green belt to Elvington
- Remove H39 building proposal
- **Northminster Ltd. / Joseph Rowntree Housing Trust / William Birch & Sons Ltd.** - Proposed modification confuses. Revert back to original wording.

PM26 – Policy GI2: Biodiversity and Access to Nature [Amendment to include reference to nature conservation sites and how they will be considered]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- **Yorkshire Wildlife Trust** – Clarifying protection of wildlife sites is very important and fully supported.
- An individual considered that the Inspector has requested resubmission of draft Local Plan for consultation, and this has been done.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **Yorkshire Wildlife Trust** – Supports the change; considers that the plan will be more consistent with national policy and the allocations proposed better justified with the strengthening of this policy.
- **Natural England** – Satisfied PM 26 addresses concerns regarding GI2
- **Natural England** – Welcomes inclusion of criterion vii.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- PM 26 is supported but not being followed through for H39 where the building proposal is not taking into account a needed buffer zone to Derwent Ings SSSI.
- **Industrial Property Investment Fund** – Modification to Policy GI2 is unsound as SINC designation to Poppleton Glassworks is not justified,

General comments

- This will have an adverse effect on Heslington Tillmire SSSI.

Modifications

Proposed modifications include:

- Evidence is required to show modification is being implemented when building.
- **Natural England** – CYC to provide detail, through Local Plan or others, on how net gains for biodiversity will be delivered
- **Industrial Property Investment Fund** – Policy G12 should provide greater flexibility in its wording to allow SINC sites to be de-designated if relevant evidence is provided

PM27 – Policy GI2: Biodiversity and Access to Nature [Clarify the planning approach to nature conservation sites]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this

modification and/or theme:

- No Comment

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **Natural England** – Welcome clarification from developments to consider mitigation for impact of recreational disturbance on designated sites.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No proof from CYC that OS10 mitigation will protect the Tillmire SSSI from development of ST15

Modifications

Proposed modifications include:

- No Comment

PM28 – Policy GI6: New Open Space Provision

[Indicative open space removed following the outcomes of HRA February 2019 and removal of Policy SS19 & Site ST35]

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. Refer to Section 9

PM29 – Policies Map Green Belt Change - Moor Lane, Woodthorpe

[Metalled roads to be considered part of built-up area]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

PM30 – Policies Map Green Belt Change - rear of St Olaves & St Peters School [To represent changes since the boundary was drafted and to reflect completed planning permission]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- **St Peters School** states that the Council's defining of the Green Belt at St Peters School does not comply with NPPF, for the following reasons: the Local Plan ensuring consistent strategy for identifying requirements for sustainable development; including land which is unnecessary to keep permanently open, using readily recognisable physical features that are likely to be permanent to define boundaries.

Modifications

Proposed modifications include:

- **St Peters School** states that proposed revision of PM30 follows the existing St Olaves Junior School boundary and includes the public footpath at its western boundary. This area of land should be excluded from the Green Belt.

See Section 14 which sets out the extent of further GB modifications identified as part of this consultation.

**PM31 – Policies Map Green Belt Change - Windy Ridge, Huntington
[To represent changes since first drafted and to reflect completed planning permission]**

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

**PM32 – Policies Map Green Belt Change - Jockey Lane
[Metalled roads to be considered part of built-up area]**

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

**PM33 – Policies Map Green Belt Change - Land to the rear of Osbaldwick Village
[Consistency of methodology requires boundary to follow closely the main urban area]**

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- The Plan has been prepared with due diligence.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **The Campaign to Protect Rural England North Yorkshire** welcomes

revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

- The decision to propose these changes shows good judgement assessment of development and infrastructure requirements that will improve the soundness of the Plan. Support the proposed boundary changes to the rear of Osbaldwick Village / Murton Way and keep land to the north of the proposed boundary open.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

PM34 – Policies Map Green Belt Change - Land at Hull Rd, North of Grimston Bar **[Consistency of methodology requires boundary to align with limit of urban area]**

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **The Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

PM35 – Policies Map Green Belt Change – Heslington Road and Garrow Hill [Metalled roads to be considered part of built-up area]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- Savills (UK) Ltd OBO **Retreat Living Ltd** and Carter Jonas OBO **Schoen Clinic York Ltd/The Retreat Living** objects to these modifications on the grounds that they represent cosmetic alterations to the green belt boundary that fail to take the opportunity to exclude the Retreat from the Green Belt.

Modifications

Proposed modifications include:

- No proposed modification suggested to the presented boundaries
- Savills (UK) Ltd OBO **Retreat Living Ltd** and Carter Jonas OBO **Schoen Clinic York Ltd/The Retreat Living** have submitted sites for removal from the Green Belt which are directly to the south of this proposed boundary – See Alt site 861 and 862 in section 13 and section 14.5.

**PM36 – Policies Map Green Belt Change – Little Hob Moor
[Green belt boundary to exclude Little Hob Moor]**

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- **Cllr Stephen Fenton** stated that there is no compelling justification why this area should be afforded less protection than the rest of Micklegate Stray, which would continue to enjoy Green Belt protection. The long term strategic permanence of the Green Belt is determined by its ability to endure over the lifetime of the Plan and beyond, Little Hob Moor meets this criteria for inclusion in the Green Belt.

**PM37 – Policies Map Green Belt Change – South of Askham Bar Park and Ride
[Green Belt modification to follow a new Park and Ride boundary]**

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or

theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

PM38 – Policies Map Green Belt Change – York College, Tadcaster Road [Boundary to follow identifiable features of sports pitch]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- The **Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

**PM39 – Policies Map Green Belt Change – Strensall Village
[Boundary to follow along Ox Carr Lane]**

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **The Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.
- **Strensall and Towthorpe Parish Council** support the boundary changes.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- Avison Young OBO **Defence Infrastructure Organisation (DIO)** states that the DIO firmly of the view that the boundary defined in the submitted Plan is consistent with NPPF and it therefore sound. In relation to the 5 purposes of the Green Belt, QEB land is not open, it is developed, so is not performing / cannot perform a role in checking unrestricted sprawl; it cannot be held to perform any strategic or local role in keeping neighbouring towns from merging; it is developed and is not open countryside; it does not form part of the setting of a historic town; it is urban land. The boundary of the Barracks is clear and there is no prospect of development occurring to the east on account of the preservation of the SSSI and the SAC. Ultimately it makes no sense to include QEB within the GB.
- Lichfields OBO **Taylor Wimpey Ltd** objects to PM39 as it considers that the proposed inner Green Belt boundary around Strensall has not been properly assessed and the changes proposed in PM39 fails to release land at Brecks Lane, Strensall, from the Green Belt. There is a lack of transparency as to how the findings within the document have resulted in the Green Belt boundaries identified. TP1 Addendum sets out how the 5 purposes of Green Belt have been applied to CYC area. Based on the assessment in the TP1 Addendum, the only specific purposes that the Brecks Lane site appears to serve are Purpose 1 and Purpose 3. It is also not clear what weight has been given to each purpose and there is no clear explanation as to how this has informed the Council's overall conclusions on the strategic areas which need

to be kept permanently open. Whilst Taylor Wimpey welcomes the exclusion of the settlement of Strensall from the Green Belt it has concerns with the proposed inset boundary and considers that the approach taken to identifying the boundary is fundamentally flawed. Annex 4 of the TP1 Addendum provides a plan which identifies the proposed boundaries for Strensall. Taylor Wimpey considers that the approach taken of identifying Green Belt boundaries and then attempting to retrofit allocations in afterwards is illogical. This process should have been undertaken prior to any allocations being identified in order to help inform what the most appropriate locations are. The identification of safeguarded land is considered particularly important as the Local Plan will set detailed Green Belt boundaries for the first time and an appropriate and sound strategy is therefore required to enable flexibility beyond the plan period. Taylor Wimpey consider that safeguarded land is required in the City to provide a degree of permanence to the Green Belt boundary and avoid the need for future review.

Modifications

Proposed modifications include:

- Lichfields OBO **Wakeford Properties** propose that land at Southfields Road and Princess Road, Strensall, should be excluded from the Green Belt and either allocated as residential or safeguarded land.
- Avison Young OBO **Defence Infrastructure Organisation (DIO)** propose that the Green Belt boundary as defined in the Submitted Local Plan should be maintained, as that boundary is consistent with NPPF and the land is not open, is already developed and does not perform any Green Belt function.

See Section 14 which sets out the extent of further GB modifications identified as part of this consultation.

PM40 – Policies Map Green Belt Change – Elvington Industrial Estate, Elvington **[Boundary to follow recognisable natural features on ground]**

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- A number of respondents have concerns that Elvington Parish Council and resident's views have not been adequately consulted regarding PM40 and other developments affecting Elvington, and previous views not considered

adequately.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **The Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.
- **The Lindum Group** and one respondent supports the Green Belt boundary amendment at Elvington Industrial Estate – the site has the support of the Council’s Economic Growth team and there is an outline planning application on the site, pending determination.
- **William Birch & Sons Ltd** state that the proposed change at Elvington Industrial Estate reflects circumstances on the ground and the land does not contribute to the openness of the Green Belt and is supported.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- A number of respondents have concerns that Elvington Parish Council and residents views have not been adequately consulted regarding PM40 and other developments affecting Elvington, and previous views not considered adequately.
- Development will be detrimental to the environment and the village as a whole for the reasons such as infrastructure, road access and congestion, utilities, flooding and wildlife habitats, inc bats whose nests are illegal to disturb.
- The map shows the portion being taken out of the Green Belt also covers Elvington Park & The Conifers – the industrial area should be the only part that is treated as Green Belt.

Modifications

Proposed modifications include:

- Retain Elvington Village and site (and others in Elvington – eg. H39, Airfield etc) in the Green Belt.
- More consultation with residents / Parish Council / Councillors is required in future.
- Redefine the greenbelt boundary around Elvington Industrial Estate to exclude the residential housing estates of Elvington Park, The Conifers and

Jubilee Court

See Section 14 which sets out the extent of further GB modifications identified as part of this consultation.

PM41 – Policies Map Green Belt Change – Knapton Village [Village to be washed over by Green Belt]

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **The Campaign to Protect Rural England North Yorkshire** welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. Strongly supports the 'washing over' of Knapton in to the Green Belt.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- Indigo Planning (now part of WSP) OBO **Novus Investments** states that the built form of the village doesn't meet Green Belt purposes as the village has approx 100 households and lacks openness.
- Indigo Planning (now part of WSP) OBO **Novus Investments** states that the village already has a tightly drawn boundary which prevents coalescence and maintains the character of the village and of York, and maintenance of the historic character is aided by the Rufforth and Knapton Neighbourhood Plan.
- Carter Jonas OBO **Karbon Homes** states that PM41 represents a cosmetic alteration and fails to take the opportunity to redraw the boundary in this part of York – the A1237 would be a more appropriate Green Belt boundary in this area.

Modifications

Proposed modifications include:

- Indigo Planning (now part of WSP) OBO **Novus Investments** proposes that

the Green Belt extends to Knapton Village boundary only and that the proposed 'washing over' of the village by the Green Belt be removed.

**PM42 – Policy T7: Minimising and accommodating generated trips
[Remove reference to Policy SS19 & Site ST35]**

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. **Refer to Section 9**

**PM43 – Table 15.2 – Delivery and Monitoring (Spatial Strategy)
[Remove reference to Policy SS19 & Site ST35]**

Note that comments have been summarised in relation to the Plan-wide theme around the removal of Queen Elizabeth Barracks, Strensall. **Refer to Section 9**

**PM44 – Table 15.2 Delivery and Monitoring (Housing)
[Align with updated evidence from HNU January 2019 by GL Hearn]**

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No comments provided

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

**PM45 – Table 15.2: Delivery and Monitoring (Green Infrastructure)
[Target requirement for monitoring and review of recreational pressure]**

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- No comments provided

Respondents that consider the plan unsound in regards to this modification and/or theme:

- **Defence Infrastructure Organisation** - CYC does not have accurate baseline data to measure increased pressure on Strensall conservation site. Has not discussed monitoring with landowner.

Modifications

Proposed modifications include:

- **Defence Infrastructure Organisation** - CYC must monitor how Strensall Common is used going forward.

**PM46 – Table 15.2 Delivery and Monitoring (Green Infrastructure)
[Indicator requirement for monitoring and review of recreational pressure]**

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- No comments provided.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

- **Natural England** – Welcomes inclusion of a target and indicator regarding pressures on Strensall Common SAC, Lower Derwent Valley

SPA/SAC/Ramsar and Skipwith Common SAC

Respondents that consider the plan unsound in regards to this modification and/or theme:

- No comments provided.

Modifications

Proposed modifications include:

- No comments provided.

8. Comments on the Plan-wide Theme – York’s future Housing Requirement

8.1 The following provides a summary of comments received in relation to the Plan’s Housing Requirement, including to the Council’s proposed revised OAHN figure, the supporting evidence and subsequent proposed modifications to the submitted Local Plan suggested by the Council, including the Housing Needs Update by GL Hearn, dated January 2019 [EX/CYC/9], the proposed modifications schedule relating to the revised OAHN figure [EX/CYC/15], comments on the updated Figure 5.1 and Table 5.2 Housing Trajectories based on the revised OAHN figure to 2033 [EX/CYC/17a] and to 2038 [EX/CYC/17b]. Comments received on the following Proposed Modifications form part of this summary:

- PM3 – Explanation of City of York Housing Needs
- PM4 – Policy SS1: Delivering Sustainable Growth for York - Policy
- PM5 – Policy SS1: Delivering Sustainable Growth for York (Explanation)
- PM22 – Policy H1: Housing Allocations Explanation
- PM44 – Table 15.2: Delivery and Monitoring – Housing
- PM 20a to 20d and PM21a to 21d

Summary of Plan-wide Housing Issues

Housing requirements, Housing Trajectory and the Housing Need Update.

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this modification and/or theme:

- **Barwood Strategic Land II LLP** / Individual response - appears to be no further update on the Duty to Co-operate process and what neighbouring Authorities consider to be any issues arising out of the 9% reduction in York’s housing need to 790 dpa.
- **Wakeford Properties, Bellway Homes and Taylor Wimpey Ltd** believe that the housing trajectory is both legally compliant and complies with the duty to co-operate.

Soundness

Respondents that consider the plan sound in regards to this modification and/or theme:

Housing Requirements

- **Selby District Council** – Satisfied that the amended housing figure is underpinned by robust evidence in the form of the updated SHMA which has applied an uplift to take account of economic growth.
- **Strensall and Towthorpe Parish Council** – Support reducing the objectively assessed housing need from 867 to 790 dwellings pa.
- **Campaign to Protect Rural England North Yorkshire (CPRENY)** – Welcomes GL Hearn figure of 790 dpa, but still considers this figure to be still high in comparison to current build out ate of 575 dpa.
- A Member of the public considers that this was a realistic projection of housing needs.

Housing Needs Update

- **Gladman Developments** - The use of and reference to the 2016-based household projections for the purposes of the examination of the York Local Plan is considered to be consistent with relevant national planning policy (20012 NPPF) in line with transitional arrangements. There is however a need for these projections to be subject to interrogation, reflecting advice provided in PPG5 and in response to the Government's response to the capacity of the 2016-based household projections to respond to objectives to boost housing land supply. Also welcome economic led housing requirement.

Housing Trajectory

- No responses received stating the housing trajectory to be sound.

General comments were received as follows:

- **Ryedale District Council** - The District Council reiterates its position that the City should meet its own housing needs and has no comments or objection to the proposed modification to the OAN. It will be vital that the City responds to any future under delivery accordingly.
- **Hambleton District Council and North Yorkshire County Council NYCC** – Note the change to housing requirements but make no comments on the annual housing provision.
- **Harrogate Borough Council** - There is agreement amongst the Leeds City Region Authorities and North Yorkshire Authorities that each will plan to meet

their housing needs within their own local authority boundaries. Harrogate Borough Council is planning to meet in full its objectively assessed need, it is not making provision to deal with undersupply elsewhere. City of York Council will need to satisfy itself that, in light of its refreshed evidence on housing need, the City of York Local Plan will meet the tests of soundness.

Respondents that consider the plan unsound in regards to this modification and/or theme:

Housing Requirements

- **Fulford Parish Council** – Considers the evidence over-estimates the OAHN for the city over the plan period and beyond.
- **Gladman Developments** – Disagrees with 790 dpa due to lack of full market signals consideration and considers that at least 867 dpa should be maintained.
- **Westfield Lodge and Yaldara Ltd** - New housing figure significantly lower than all previous estimates, does not match with government ambition to significantly boost housing construction or the draft NPPF methodology figure of 1070. Proposed modifications do not make provision for sufficient housing.
- **Persimmon Homes, Bellway Homes, Wakeford Properties and Taylor Wimpey** – Object to OAHN of 790 which they consider is fundamentally flawed based on the evidence base and assumptions used. Support alternative OAHN of 1300 dpa (+285 shortfall) between 2017-33 for York (22% higher than MHCLG standard method of 1069 dpa)
- **Galtres Garden Village Development Group** - Consider OAHN of 790 to be inadequate. Support alternative OAHN based on standard methodology of 1,070 dpa.
- **Industrial Property Investment Fund (IPIF)** – CYC has consistently failed to provide the minimum level of housing required. It is clear, when looking at paragraph 73 of the NPPF (2019), that due to under delivery a 20% buffer should be applied to the 790 dpa calculated as part of the Proposed Modifications (June 2019).
- **Home Builders Federation** - Object to 790dpa based on the HNU 2019.
- **Level Developments Ltd.** - New housing figure of 790 p/a does not meet national government ambition or deal adequately with housing affordability issues in York. Low OAHN will lock younger people out of housing market. Attached is an economic analysis that evidences and argues for higher OAHN

number.

- **Barratt and David Wilson Homes / TW Fields** - The 2014 based household projection for York should represent the demographic starting point of housing need of 849 dpa once the Council's vacancy rate assumption has been applied. Applying the Council's 15% market signals uplift would result in 976 dpa. However, the market signals uplift should also be considered in context of the 30% market signals uplift applied under Standard Method, which results in overall need of 1,069 dpa
- **Avison Young obo Defence Infrastructure Organisation** - Both the modification (to 790dpa) and the 867dpa specified in the Submission Plan are unsound. The full OAN should be calculated at 997dpa. While the Plan is being produced under transitional arrangements, the Government's standard method indicates that York's current base housing need is 1,099dpa and this gives a clear indication of the level of growth that CYC is going to achieve in the near future.
- **Picton Capital** – Housing need figure should be revised upwards to 1,066 p/a at a bare minimum, if not 1,226 in order to meet housing need and take a positive approach to planning for future needs of the city. SHMA should be set aside in preference for the 'Standard Methodology' for identifying housing need, but if this cannot be done then the latest GL Hearn uplifts should be incorporated to raise the OAHN to 953 dpa.
- **Green Developments** - The lower OAN figure for York is unjustified; should revert to original SHMA Update of 867 dpa plus 10% (953 dpa) from submission. Direction of travel is upwards not downwards in standard method.
- **York Labour Party / York Labour Group / Rachel Maskell MP** – Lowering housing number is unsound as in light of affordability issues. Support the standard methodology housing figure. The plan demonstrates no concern for affordability of housing and does not try and reverse it. The plan does not examine the benefits of alternative scenarios and housing provision has been revised downwards despite all indicators showing the situation in York deteriorating.
- **Langwith Development Group** – Consider the proposed change unsound. The reduction in housing delivery requirement is contradictory to the indicators of housing need in the City, most notably, an increasing affordability gap, growing need for affordable homes and the City's growing Economic base. A submitted critique of the Housing Needs Update considers there potential for OAN to be based on 2014 projections: 854 dwgs + 20% market signals = 1,025 dpa. Allowing for a further economic adjustment to balance future population with expected jobs, this would take the OAN to 1,425 dpa.

- **Barwood Strategic Land II LLP**- Object to proposed OAN; The minimum OAN for York should be 1,026 dpa based on report review by Hatch Regeneris. Examination must consider whether the lower OAN represents an appropriate response to tackling poor affordability, support likely future employment growth and level of housing growth necessary in York and across the HMA.
- **Private Landowners west of ST8 / Redrow Homes** - Object to the Council's further reduction to the housing requirement. While the CYC Local Plan has been submitted and is being examined under transitional arrangements and against the 2012 NPPF, concerned with the use of 2016 based population projections and household projections, which does not accord with the Government's Standard Method. Further, it is recommended that the student housing requirement in York is considered in isolation, and therefore removed from both the identified supply and the overall requirement and regarded as a separate policy requirement.
- **Yorvik Homes** – The governments approach of using a requirement of 1070 dpa is seen as reasonable not 790 dpa. The Council's calculation of housing need is significantly flawed for the following reasons (1) the use of 2016 population and household projections is contrary to Government Policy, (2) the requirement is too low, (3) calculations for previous completions is too high ((i.e. estimate of backlog too low), (4) outstanding commitments include student housing that should be excluded and (5) windfalls should not be treated as part the Plan.
- **Shepherd Homes** - Use of 2016 population and household projections is contrary to Government Guidance; the housing need calculation is too low; the calculation of completions since 2012 is too high (i.e. the Councils estimate of backlog is too low); outstanding commitments include student housing that should be excluded and windfalls should not be include in the Local Plan Calculation.
- **York and North Yorkshire Chamber of Commerce Property Forum** – The proposed OAN figure is inadequate and not based on sound evidence.
- **York and District Trades Union Council** - Object strongly to the further downward revisions in the housing numbers. Plan already fails to provide enough housing of the right sort, and particular affordable / social housing for the future.
- **Karbon Homes** – object to proposed 790 dpa. Previously 953 dpa would have been justified; now housing need figure should be a minimum of 1,066 dpa and most appropriately 1,226 dpa to engage with the need for affordable housing.

- **Schoen Clinic York Ltd / The Retreat Living** - CYC should adopt a more appropriate Local Housing Need figure of between 997 & 1080 dpa.
- **Councillor David Carr** – The reduced OAN is welcomed but is still considered to be too high in light of other authoritative population projections which have emerged since the original plan was submitted in May 2018.

Comments made by individuals include:

- Not effective as does not provide enough new housing.
- The lower OAHN is welcomed but is still considered too high in light of population projections emerging since the original plan submission in May 2018.
- The council has exaggerated its housing requirement so some sites no longer required.
- Ignores National Statistics Population Forecast (Sept. 2018) indicating a requirement of 480 dpa
- It is not justified as it is not the most appropriate strategy and it will not be effective in meeting the city's needs and is not consistent with national policy Evidence base unsound in that that it is not positively prepared and does not meet the area's development needs.
- Plan does not seek to surpass the OAN.

Housing Needs Update

- **Fulford Parish Council** - The GL Hearn report is not sound and over-estimates the OAHN for the city over the plan period and beyond. There is no new information in the January 2019 Housing Needs Update which would justify an increase above the original recommendation.
- **Gladman Developments** disagrees with not applying a further increase to the OAN figure in addition to the adjustment made for economic growth. Gladman does not therefore agree with the Council's decision to reduce the housing requirement to 790 dwellings per year in response to this recommendation.
- **Westfield Lodge and Yaldara Ltd** - New evidence significantly and fundamentally differs to all previous evidence and the Government's own calculations. Not considered consistent with National Planning Policy Framework in terms of OAN figure, housing mix and affordability.
- **Persimmon Homes, Bellway Homes, Wakeford Properties and Taylor Wimpey** – Housing Needs Update is flawed. Demographic, market signals, employment growth, affordable and student housing need, shortfall of

housing, have all been underestimated. Alternative evidence base submitted by consultants Lichfields. Key points:

- OAHN of 790 is fundamentally flawed in terms of demographic baseline. There are significant concerns regarding robustness of the 2016-based Sub-National Population Projections (SNPP) and consider that the demographic baseline is revised from 458 to 921.
- GL Hearn's uplift is 15%; greater uplift of at least 20% would be more appropriate. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for 1,105 dpa.
- Given the significant affordable housing need identified in City of York, a further 10% uplift would be appropriate and should be applied to the OAHN, resulting in a figure of 1,215 dpa.
- A further 84 dpa is required for providing student accommodation.
- Rounded this equates to a OAHN of 1300 dpa between 2017-33 for York (22% higher than MHCLG standard method of 1069 dpa)
- Backlog of +285 dpa should be met (against need of 13dpa).
- **Gateway Developments (York) Limited**– Housing Needs Update 2019 is fundamentally based on 2016 Sub-National Population Projections and is entirely inconsistent with the Governments approach that maintains commitment to boosting housing levels.
- **Galtres Garden Village Development Group** - Consider OAHN of 790 to be inadequate and object to use of 2016 projections contrary to Government Guidance. The calculation of completions since 2012 is too high (Councils estimate of backlog is too low). Support alternative OAHN based on standard methodology of 1,070 dpa. 1,887 shortfall using council figures, or a 2,902 shortfall using alternative assessment of need. Council would fail housing delivery test for 6 of the last 7 years. Using council dpa of 790 with their assumptions on backlog, commitments and windfall gives a land supply of 3.34 years. A significant proportion of the draft housing allocations are large sites that will take several years before they deliver a significant increase in housing supply and adoption of the plan is at least 2 years away, if not more;
- **Home Builders Federation** - Object to 790dpa based on the HNU 2019. Numbers of older people and younger peoples household formation rates are not set to grow as previously anticipated. 2016 projections will not achieve government's aim and so 2014 projections should be used.
- **Barratt and David Wilson Homes / TW Fields**- The 2014 projections should take preference to the 2016 projections following the Government's technical

consultation in respect of the 2018 NPPF's Standard Method, and the subsequent confirmation in the Planning Practice Guidance (PPG) that 2016-based ONS household projections should not be used for the purpose of calculating Standard Method. 2016 figures are based on a much shorter historical period and do not take account of worsening affordability or concealed households.

- **Defence Infrastructure Organisation** – CYC has shifted the demographic based starting point from the 2014 based to 2016 based projections, which is not credible and significantly reduces the projected growth up to 2033 underestimating the need for homes. The adjustment (15%) for market signals is insufficient to address the widening affordability gap in York and should instead be applied to the 2014 projection – with an overall OAN of 997 dpa.
- **Green Developments** – Considers that a different methodology has been used to calculate the lower OAN compared to the Submission SHMA. There is not sufficient explanation or comparison between the methods used to show how each derived different figures. The 2016 based household projections would not achieve nationally the Government target; projections are upwards and therefore lower OAN not justified. Should stick with 953dpa as recommended at submission stage.
- **Langwith Development Group** -.The HNU fails to explain, or provide any justification, why it is appropriate to use the 2016 projections, against a clear backdrop of evidence that points to a housing need in York that is not falling but needs to be significantly boosted. Should 2016 projections be deemed appropriate to adopt the as the starting point for calculating York's OAN, then they must be subject to appropriate adjustments to reflect economic growth, worsening trends of affordability and household formation. Submission of alternative OAN method statement submitted.
- **Private Landowners** - The Council has provided no explanation to date as to why they decided to ignore the advice of their consultants, and why it was appropriate to artificially reduce the housing target.
- **Barwood Strategic Land II LLP**- HNU report review by Hatch Regeneris submitted. The key points made include:

The HNU

- is silent on York's housing market area and the implications for the HMA of the new evidence it considers
- is not clear how the Plan aligns future housing and jobs

- relies on short term trends in 2016 population projections as the basis for predicting future need.
- Is not clear - a lack of transparency about the assumptions used makes it difficult to determine the robustness of the figures.

Examination must consider whether the lower OAN represents appropriate response to tackling affordability, employment and housing growth necessary in York and across the HMA.

A higher market signals adjustment is justified. On the basis of the Council's own analysis, the minimum should be 20%. However, the figure of 30% implied by the new standard methodology would be consistent with the weight of evidence that now shows that much higher increases in housing supply relative to demand are essential if England's severe affordability problems are to be addressed.

Overall support OAN of 1026 dpa.

- **Linden Homes / Shepherd Homes / Mulgrave Properties / Yorvik Homes -** Considers evidence base upon which the new OAHN is based to be unsound. Object to the use of ONS 2016 population projections as MHCLG confirmed in a 2018 paper that government aspirations for house building remain unchanged. NPPG also states that the 2016 projections should not form the basis of a new OAHN. GL Hearn approach to OAHN is inconsistent with past work. 2017 SHMA considered a 10% uplift necessary in light of both market signals and affordable housing need, the Housing Needs Update does not consider an uplift for affordability necessary at all but 15% uplift should have been applied to the economics led housing need of 790 dwellings p/a.. Welcome the use of economic led housing need scenario and the positive attitude to growth but this does not lessen the importance of market signals or the lack of affordable housing
- **York and North Yorkshire Chamber of Commerce Property Forum -** This figure is inadequate as the 2016 populations and household projections are contrary to Govt Guidance. The OAN has been wrongly calculated and contrary to PPG of 20th Feb 2019 that include 2014 based household projections within the standard method and it is clear Govt has rejected 2016 projections. Shortcomings of projections already highlighted.
- **Karbon Homes / Banks Property –** Council is going against national policy by using the 2016 household projection figures instead of the 2014 data. The latest 2019 'update' considered to be flawed. Conflict in Council's approach to use up-to-date data, but not the most recent national policy guidance.

Housing Trajectory

- **KCS Development, Yorvik Homes, Taylor Wimpey Ltd, Redrow Homes and landowners at ST8** object to the undersupply (backlog) of 512 dwellings being annualised over the Plan period rather than over the first 5 years (i.e. the Sedgefield approach).
- **Taylor Wimpey Ltd and Persimmon Homes** believe the lead-in times used in the trajectory are overly optimistic and unrealistic and do not provide a robust set of assumptions to base the trajectory upon. Specifically:
 - Delivery rates of 35 dwellings per annum per outlet are realistic. However, the general rates used in the trajectory are overly optimistic.
 - Density assumptions used are questioned;
 - Do not consider that a number of allocations have a realistic prospect of delivering homes within the first 5 years of the Plan.
 - The windfall allowance to be overly optimistic. Whilst they accept that windfalls should be included within the future trajectory they oppose their inclusion in the first 5 years of the Plan. This would have the potential for over inflating housing delivery together with creating the potential for double counting of consented sites and consider the main reasons to reduce windfall allowances to be (1) a finite supply of potential sites due to tight settlement boundaries and, (2) high recent windfall figures due to recent changes to permitted development rights that have inflated historic delivery rates.
 - Concerns about the inclusion of privately managed off-campus student accommodation in calculated past housing completions
 - Table PM21c/d that sets out CYCs projected 5 year housing supply position that covers a 6 year period. They consider that the Council's approach does not accord with the 2014 PPG/2012 NPPF approach to calculating housing supply.
 - CYC apply a 20% buffer in accordance with Para 47 of the NPPF (2012) to the forward requirement and under provision (using the Sedgefield Methods) with an OAHN of 790 dpa there would be a shortfall within the 5 year housing supply. This would impact further if the Lichfield OAHN figure was to be used resulting in only a 2.18 year land supply.
- **Wakeford Properties** do not believe that CYC have allocated sufficient housing sites to meet the OAHN and does not have the flexibility required over the Plan period. Council's housing trajectory assumptions and proposed

modification to housing requirement (with an OAHN of 790) is not based on robust evidence and not compliant with the NPPF.

- **Bellway Homes** have concerns about past housing delivery that includes off campus privately managed student accommodation. They also believe the suggested delivery rates to be unrealistic and not sufficient to demonstrate a 5 year supply. They propose that CYC should provide clear evidence that completions will take place on sites within 5 years citing that many of the allocations do not have submitted applications. Based on their OAHN of 1300 dpa CYC cannot demonstrate a 5 year housing supply.
- **Defence Infrastructure Organisation** raise concerns about projected housing delivery rates especially in the first half of the Plan period. Further assumed rates of delivery at 35 dpa are too low with major sites at 100-120 dpa a more realistic yield. Concern is also raised about provision for development beyond the Plan period.
- **Taylor Wimpey Ltd** object to CYCs housing requirement projections and believe further housing allocations will need to be identified in Policy H1 enabling release of green belt land needed for flexibility.
- **Langwith Development Group** highlight their anticipated delivery and phasing of ST15.
- **Redrow Homes and Taylor Wimpey Ltd** object to unrealistic delivery projections for both ST7 and ST8
- **York and North Yorkshire Chamber of Commerce** believe CYC have adopted the wrong approach to estimating housing commitments, backlog and the inclusion of student housing. Windfall inclusion is also questioned.
- **Gateway Developments (York) Ltd.** Consider that CYC does not have a 5 year supply.
- **Private Landowners / Galtres Garden Village Development Group** - A significant proportion of the draft housing allocations are large sites that will take several years before they deliver a significant increase in housing supply and adoption of the plan is at least 2 years away, if not more.
- **York Labour Group /York Labour Party / Rachel Maskell MP-** Support the removal of ST35, also advocated caution around ST36. Together these two sites create a 1200 home hole in the possible future provision which is needed.
- **Shepherd Homes** - When considering the deliverability of allocated sites and using council OAHN of 790 land supply is 6.39 years, using the 1,070 OAHN assumption produces a land supply of just 3.01 years. Will take several years

before large sites deliver a significant increase in housing supply and adoption of the plan is at least 2 years away, if not more. In the meantime, the only credible source of housing land supply is likely to come sites such as the site south of Cherry Lane that can deliver houses quickly.

- **Yorvik Homes** and a private landowner refer to the Governments housing requirement of 1070 dpa rather than that used by CYC of 790 and highlight the difference in the figures especially when assessing the requirement over the longer term needed to establish the green belt boundaries. Also that long lead-in times for development of these sites will likely result in a shortfall of delivery, particularly in the early years of the Plan. The Plan will not secure Green Belt boundaries that will endure beyond the plan period.
- **York and North Yorkshire Chamber of Commerce Property Forum** - The adoption of the Plan is likely to be early to mid 2021 leaving only 12 years of the Plan remaining - to meet the housing needs the plan period should be moved forward so development needs of the city can be properly accommodated.
- **L & Q Estates (Formerly Gallagher Estates)** - Indicative densities are too high and give unrealistic expectations of dwellings that can be delivered on the amount of land allocated. Plan relies too heavily on a small number of large sites with excessively optimistic assumptions about timing of delivery and dwellings that can be built.
- **Westfield Lodge and Yaldara Ltd.** - Significant infrastructure and master planning will result in delays to sites >100 homes and we question the deliverability of a consistent 5 year housing land supply to ensure choice and completion
- **Banks Property Ltd / Karbon Homes** query the deliverability of allocated sites and states NPPF places emphasis on plans having a diverse pool of sites to ensure a balanced housing market. Trajectory is overly confident in large strategic allocations delivering a high number of units in a relatively small window of time.
- **Retreat Living Ltd.** - Further development allocations and safeguarded sites are needed because a majority of brown field sites identified do not have planning permission and therefore deliverability is questionable.
- **Pilcher Homes** - NPPF 2012 para 48 allowance for windfall sites in the five year plan requires compelling evidence of consistent and reliable supply of windfall sites and CYC has overstated the supply of windfall sites and not provided compelling evidence.
- **Fulford Parish Council** queries why there are 4 different trajectories and

requests clarity as to why CYC are proposing a 10% non-implementation rate, especially in terms of previously consented sites. They also state that CYC's position with the housing shortfall is incorrect. The Parish Council object to the overprovision of housing over the Plan period. An OAHN figure equalling 532 dpa is proposed as a reasonable figure based on the 2016 SNHP (plus 10% uplift).

- **Barratt and David Wilson Homes** raise concerns about the impact of York Central on the future housing supply citing that the site has only recently received outline consent, has no developers signed up and requires land assembly, sale and preparation prior to homes being released. CYC need to be more realistic about the delivery assumption of this strategic site with homes projected further into the Plan period and beyond – this would require the need for further sites to achieve the housing requirement earlier in the trajectory.

Individuals commented

- Plan does not identify a supply of specific deliverable sites to provide for five years worth of housing against their requirements with an additional buffer of 20% to ensure choice and competition in the market for land.
- The Council is relying on a small number of strategic housing sites to deliver the necessary housing provision, but long lead-in times for development of these sites will likely result in a shortfall of delivery, particularly in the early years of the Plan.

Housing General

- **Jennifer Hubbard Planning Consultant** - Modifications do not address the Inspectors' the queries on housing need as set out in their initial letter to the Council of 24 July 2018.
- **Westfield Lodge and Yaldara Ltd** - Large scale sites require significant funding for infrastructure and are more complicated to deliver than small scale sites. Difficulties of delivery from large scale sites compared to small scale sites (i.e. H37) could impact upon the Council's first five year targets.
- **Industrial Property Investment Fund (IPIF)** – The consequences of the modifications made in regard to housing supply have a knock on effect in regard to employment land and should be addressed by the Council. Further employment allocations should be made to allow for the associated economic benefits associated with an increase in housing allocations. CYC are currently delivering half of the employment land required. Demand is high for office and

industrial space based on available supply. Take up rates of the past five years show that supply will be exhausted in five months ie December 2019.

- **York Labour Group /York Labour Party / Rachel Maskell MP** - There are strong reasons for thinking the overall housing number is unreliable because the nature of brownfield developments is producing homes which do not meet the Council's identified priorities. Disagrees with affordable housing targets which are considered to not meet identified need. In addition, whilst support the removal of ST35, also advocated caution around ST36, these two sites create a 1200 home hole in the possible future provision which is needed.

Modifications

Proposed modifications include:

Housing Requirement and Housing Needs Update

- **Bellway Homes / Persimmon Homes / Taylor Wimpey / Wakeford Properties** – amendment to the OAN to 1300 dpa plus shortfall based on the following method by supporting evidence from Lichfields:
 - Based on 2014 SNHP demographic baseline for OAHN should be 921 dpa.
 - uplift increased to at least 20% (1,105 dpa) (as opposed to 15%)
 - Further 10% uplift for affordable housing (1,215 dpa).
 - Meet student housing needs - addition 84 dwellings (1,299 dpa).
 - Apply backlog in full over plan period – 285 dpa based on revised OAN of 1300 dpa.
- **Taylor Wimpey** - An affordable housing target of 30% uplift is not achievable so proposes a 10% uplift.
- **Gateway Developments (York) Ltd / Home Builders Federation / Redrow Homes & Private Landowners for ST8 / KCS Development / Yorvik Homes / L & Q Estates (Formerly Gallagher Estates) / York and District Trades Union Council / Pilcher Homes / Retreat Living Ltd** - Change housing requirement from 790 dpa to standard method 1070 dpa over the plan period to 2037/38
- **KCS Development / Yorvik Homes** -
 - If lower housing requirement under transitional arrangements, then

upon adoption the Local Plan should be immediately reviewed and updated in line with the Standard Methodology and updated Framework.

- Student housing should be regarded as a separate policy requirement and removed from overall requirement and supply; should not be included in completions/unimplemented permissions.
- **Level Developments Ltd.** - Revise OAHN figure upwards to at least 1,000 dwellings p/a.
- **Copmanthorpe Parish Council** - Reduced OAN in light of other authoritative population projections which have emerged since the original plan was submitted in May 2018.
- **Barratt and David Wilson Homes / TW Fields** – the housing figure should be adjusted upwards to reflect a robust assessment of the OAN. Barton Willmore evidence suggests that:
 - 2014 based household projection for York should form basis of starting point - 849 dwellings per annum (dpa) + Council's vacancy rate + 15% market signals uplift = OAN of 976 dpa.
 - However, the market signals uplift should be in the context of the 30% market signals uplift applied under Standard Method, which results in overall need of 1,069 dpa.
- **Defence Infrastructure Organisation** - The adjustment (15%) for market signals is insufficient to address the widening affordability gap in York, and should instead be applied to the 2014 projections - the full OAN should be calculated at 997dpa.
- **Picton Capital** - SHMA should be set aside in preference for:
 - the 'Standard Methodology' or
 - 1,226 to engage with need for affordable housing or u
 - use the latest GL Hearn uplifts to raise the OAHN to 953 dpa.
- **Green Developments** - The OAN should revert to the 867 dpa requirement but with the addition of the recommended market signals uplift to 953 dpa.
- **York Labour Group /York Labour Party / Rachel Maskell MP** – CYC should retain target of 1070 and produce a better balance of brownfield and greenfield development with a significant increase of affordable homes.
- **Gladman Developments** – Support 2016 household projections but should

be subject to a sensitivity test with sufficient adjustments made as a result. Minimum housing requirement of 867 dpa should be maintained through the Local Plan

- **Langwith Development Group –**

- The housing requirements need to be increased substantially over the Plan period (and post plan period to 2037/38). This equates to a minimum of 1,025 dpa over the Plan period, rising to 1,425 dpa.
- Should the Inspector deem it appropriate to adopt the 2016 projections as the starting point for calculating York's OAN, then they must be subject to appropriate adjustments to reflect economic growth, worsening trends of affordability and there may need to be further adjustment to reflect worsening trends of household formation in the 25-44 age group.

- **Barwood Strategic Land LLP –**

- The minimum OAN for York should be 1,026 dpa.
- Council's Employment Land Review jobs growth of 806 dpa but resident labour shortfall implies a housing need of 855-891 dpa.
- A higher market signals of 30% implied by the new standard methodology would be consistent with evidence for a higher increase in housing supply is essential.

- **Shepherd Homes –** The housing requirement figure for the Plan Period should be increased to at least 1,100 dwellings per annum.

- **Linden Homes Strategic Land / Shepherd Homes -** Use 2014 projections rather than 2016, revise OAHN to 1,150 in response to market signals and lack of affordable housing.

- **Retreat Living Ltd. -** CYC should adopt a more appropriate Local Housing Need figure of between 997 & 1080 dpa. Ensure that delivery of growth does not stall through insufficient site allocations.

- **Mulgrave Properties / Yorvik Homes -** Use 2014 projections rather than 2016, revise OAHN to 1,150 in response to market signals and lack of affordable housing.

- **Karbon Homes / Banks Property Ltd. –** Preference that housing need figure should be a minimum of 1,066 dpa in line with standard method and most appropriately 1,226 dpa to engage with the need for affordable housing. If not then should revert to HNU 2017 ensuring OAN of 953 dpa.

- **Fulford Parish Council** - OAHN should be based upon the demographic starting point (484dpa) plus 10% for market signals. This would give a total OAHN of 532 dpa.
- **Linden Homes Strategic Land / Shepherd Homes / Mulgrave Properties / Yorvik Homes** - 15% uplift should have been applied to the economics led housing need of 790 dpa to account for affordability issues.
- **DPP (on behalf of the private landowner of former H39)** believe that an allowance should be made for improving headship rates and that the 2014 projections should be used instead of the ones produced in 2016.

Individuals recommended modifications include:

- Housing requirement over plan period should be increased to a minimum of 1,100 dpa.
- Plan should use evidence from 2016 SHMA GL Hearn report for an OAHN of 867 dpa.
- A figure of 1,070 dpa should be used as the housing requirement and student housing data should be excluded from the completions/ permissions feeding into the trajectory.
- Revise SS1 and related policies to reflect that the OAHN should be 1,150 dpa to allow for significant uplift to respond to market signals, including affordability adjustments, as well as making a significant contribution to affordable housing needs.
- An uplift for market signals and affordable housing need should be provided.

Housing Trajectory

- **Wakeford Properties** - Identify additional housing sites to meet the significant shortfall in housing need (between 2012 - 2017)
- **KCS Development / Yorvik Homes** - Allocate further sites for development and as safeguarded land.
- **KCS Development, Taylor Wimpey Ltd, Redrow Homes & Landowners at ST8** - amend the undersupply of 512 homes from being annualised over the Plan period to being made up in the first 5 years of the Plan.
- **Persimmon Homes, Lichfield's (on behalf of Wakeford Properties) and**

Johnson Mowat (on behalf of Taylor Wimpey Ltd) recommend that more realistic lead in times should be used in the housing trajectory and that CYC should revisit the delivery assumptions to ensure a robust 5 year housing supply together with sufficient housing over the Plan period.

- **Persimmon Homes and Johnson Mowat (on behalf of Taylor Wimpey Ltd)** believe CYC should adopt a more cautious approach when seeking to include strategic allocations within the 5 year housing supply and that there will be a significant shortfall of dwellings; the Plan should allocate additional housing sites to meet the true housing requirement and to ensure an adequate 5 year supply. They also recommend
 - Sufficient housing allocations should be identified to meet the housing requirement outlined in the Lichfield report (1300 da + 285 backlog) to make Policy H1 sound
 - The delivery rate assumptions: 0-100 unit sites provide 25 dpa, 100-250 unit sites provide 40 dpa, 250-500 unit sites provide 65 dpa and 500+ unit sites provide 90 dpa.
 - Where developers are vague on detail the assumptions for an average site in York, the gross to net ratio at most should be 85%, reducing to less than 60% on strategic sites with significant infrastructure requirements. Unless there is specific evidence to the contrary the default density on suburban sites should be 35 dpha.
 - The windfall allowance should be reduced from 169 dpa to 100 dpa believed to be a far more realistic allowance over the Plan period and ensure the trajectory is not artificially inflated, can be realistically achieved and would only be incorporated at year 5 (2022/23) to avoid double counting.
- **Karbon Homes / Banks Property Ltd** - To ensure the plan is robust and will meet the required growth throughout the entire plan period, CYC must allocate more housing land to ensure the plan is prepared in a positive and effective manner in line with national policy
- **Bellway Homes** demand that CYC should revisit the evidence base that underpins the minimum housing requirement of 790 dpa and should take into account of Lichfield's analysis that results in a figure of 1300 dpa (plus housing backlog). Additional sites would be required to meet the shortfall.
- **Fulford Parish Council** consider that the inherited housing shortfall should be removed from the housing trajectory.
- **Barratt and David Wilson Homes** note that the assumptions made in the

trajectory about the deliverability of York Central are overly optimistic and wrong. Delivery in the Plan period should be significantly reduced with some of the homes to be delivered in the next Plan period

- **Thomas Pilcher** –Increase the supply of small and medium sized sites by 20%.
- **Picton Capital** - The SHLAA should be reviewed to update the plan and include a limited number of additional sites.
- **Retreat Living Ltd.** - CYC should allocate additional sites to protect housing land supply and to ensure CYC meet the Local Plan's housing requirement.

Housing Trajectory points made in relation to the inclusion of specific sites:

- **Karbon Homes** - Inclusion of Malton Road as housing allocation will improve soundness of plan, making it consistent with national policy. The allocation is considered sustainable in the 2014 draft plan and continues to present a sustainable addition to the current draft plan.
- **Taylor Wimpey Ltd** suggest include development land in which the respondent has an interest at Galtres Farm (sites 891 & 922)
- **TW Fields** – Additional land allocations are required in order to meet the City's full objectively assessed housing needs should include our client's Osbaldwick site to deliver at least 975 homes.
- **KCS Development** - Include alt site 942 Land to the West of Chapelfield, Knapton in the plan as an allocation for housing.
- **Yorvik Homes** - Allocate further sites for development and as safeguarded land, including alt site 737 Stock Hill Field, West of Church Balk, Dunnington.
- **Redrow Homes and private landowners at ST8** highlight that given the delays in the Local Plan, and the reliance of the Local Plan adoption before an approval on ST8 it is highly unrealistic to expect delivery of 35 dwellings this year, and more likely that completions will start delivering on site from 2021 onwards.

Individuals commented:

- A reduction in housing densities of sites ST31 & H29 to 70 & 65 respectively is justified by the evidence.
- Estimated yields for sites should be revisited and adjusted accordingly as per Para 5.12 of the Local Plan if the requirement is being lowered to 790 dpa

(9% less than previous figure).

General

- To ensure the estimated yields based on the Viability Study and Policy H2 are not exceeded then safeguards should be put in place.
- **Fulford Parish Council** - The OAHN should not be fully met if this would cause significant harm to the setting and special character of the historic town or to other green belt purposes.
- **Schoen Clinic York Ltd/ The Retreat Living** - The proposed inner and outer Green Belt boundaries should be drawn as appropriate to enable additional housing land to be allocated to meet a significantly increased OAN and other development needs. Safeguarded land should be also be allocated for development needs well beyond 2038.
- **Taylor Wimpey** - Employment growth alignment is to be raised by adjustment of demographic baseline.

See also Section 13 which sets out the extent of further Alternative Sites identified as part of this consultation.

9. Comments on the Plan-wide Theme – Removal of Queen Elizabeth Barracks, Strensall

9.1 The following provides a summary of comments received in relation to the Plan’s proposed modifications including the proposed deletion of sites, and policy relevant to, ST35 and H59 ‘Queen Elizabeth Barracks, Strensall’. Comments received on the following Proposed Modifications form part of this summary:

- PM2 – Removal of Deleted Policies from Contents Page
- PM6 – Policy SS10: Land North of Monks Cross
- PM8 – Policy SS12: Land West of Wigginton Road – Criterion vii
- PM13 – Policy SS19: Queen Elizabeth Barracks, Strensall - Policy
- PM14 - Policy SS19: Queen Elizabeth Barracks, Strensall - Explanation
- PM18 – Policy H1: Housing Allocation (H59)
- PM19 – Housing Allocations (ST35)
- PM28 - Policy GI6: New Open Space Provision
- PM42 – Policy T7: Minimising and Accommodating Generated Trips
- PM43 – Table 15.2: Delivery and Monitoring – Spatial Strategy

9.2 Comments on the proposed modification to the submitted Green Belt boundary are summarised to their relevant modification reference (PM38 – Policies Map Green Belt Change – Strensall Village. See Section 7 above).

Policy SS19: Queen Elizabeth Barracks, Strensall

Legal Compliance

Respondents have commented on the Plan’s Legal Compliance in relation to this site:

- Avison Young on behalf of the **Defence Infrastructure Organisation** considers that the plan in general is legally compliant.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Natural England** supports the removal of ST35 based on the outcomes of the HRA (2019).
- **Highways England** support the removal of the site which will reduce impacts on York's road network.
- **Strensall and Towthorpe Parish Council** support the removal of ST35 and H59;
- **Ryedale District Council** understand rationale for removal and raise no objection.
- **York Labour Party, City of York Council Labour Group and Rachael Maskell MP** support the removal of ST35.
- **Julian Sturdy MP** agrees with the deletion of the site but considers that further thought is given to its use to avoid dereliction.
- **Yorkshire Wildlife Trust** considers the removal of ST35 to be sound, justified and consistent with national and international policy.
- **Councillor Paul Doughty** considers that the modification is justified as it complies with the HRA (2019)
- Pegasus Group OBO **Level Developments Ltd** agree with the removal of ST35 due to impact on Strensall Common SAC and support an alternative site for development in Strensall.

Respondents that consider the plan unsound in regards to this site:

- **Fulford Parish Council** consider that the removal of the site is contrary to national policy to provide housing and that the sites should be reinstated as housing allocations. The sites should remain excluded from the Green Belt as per the submitted plan. They also consider that there is sufficient mitigation that could be imposed to avoid adverse effects on Strensall Common SAC.
- Avison Young on behalf of the **Defence Infrastructure Organisation** object strongly to the removal of policy SS19 and site allocations ST35 & H59. They consider that the allocations remain sound in spite of the visitor survey evidence and updated HRA. They consider the decision to remove the sites is flawed and based on evidence which is not robust. They are confident that there are different measures which can be used to mitigate any adverse

effects arising from development and are keen to note that they have direct control in relation to how the common is used.

General comments:

- **The West Yorkshire Combined Authority and Leeds City Region LEP** note the proposed removal of ST35 and consider this will not impact on the collective City Region growth ambition.
- One respondent is disappointed with the decision for ST35 and would like further consideration its future use.

Modifications

- **Fulford Parish Council** would like SS19, ST35 and H59 to remain in the Local Plan
- Defence Infrastructure Organisation would like the proposed modifications pertaining to SS19, SS35 and H59 deleted, and the allocation of the sites/policy reinstated.

10. Comments in relation to the Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019).

Sustainability Appraisal

Legal Compliance

Respondents have commented on Legal Compliance in relation to Sustainability Appraisal:

- **Historic England** concur with the screening process about which aspects of the Plan needed reviewing and the subsequent conclusions regarding the historic environment.
- **Natural England** welcome the updated SA and content relating to the updated HRA outcomes;
- **Fulford Parish Council** consider that the SA is not legally compliant as it has failed to consider all reasonable objectively assessed housing need alternatives and fails to consider harm as a result of the removal of ST35.
- Carter Jonas on behalf **Karbon Homes** and **Banks Property Ltd** consider that the Local Plan is not legally compliant as it has not been carried out in accordance with the legal requirements of the Sustainability Appraisal and other statutory requirements.
- **Hambleton District Council** considered the SA process to be legally compliant.

Soundness

Respondents that considered the Sustainability Appraisal sound commented:

- **Historic England** consider that the content is appropriate;
- **Natural England** welcome the updated SA and updated content.

Respondents that consider the Sustainability Appraisal unsound commented:

- Barton Willmore OBO **Barratt and David Wilson Homes** disagree with the scoring assessment between general and strategic sites, which they consider

makes direct comparison between the two difficult. In particular for sites ST12, ST7 and ST11 they consider scoring amendments are required although they do acknowledge that the sites score better than some allocations in the plan already.

- **Fulford Parish Council** consider that alternative OANs should have been considered. The benefits would have been seen in the SA in relation to a lower housing requirement, if these had been appraised.
- **Pilcher Homes** consider that the SA overlooks sustainable locations for development.
- Two respondents considered that the SA should consider alternative approaches to dealing with the Green Belt proposals.

Modifications

n/a

Habitat Regulation Assessment

Legal Compliance

Respondents that have commented on the Habitat Regulation Assessment's Legal Compliance commented:

- **Natural England** consider the HRA legally compliant and agrees with the conclusions contained in the HRA (2019).
- **East Riding of Yorkshire Council** do not object to findings of the HRA but consider that further explanation is required regarding how in-combination effects are considered.
- **Hambleton District Council** considered the HRA to be legally compliant.

Soundness

Respondents only commented where they considered the Habitat Regulation Assessment to be unsound. Key comments received included:

- Avison Young OBO **Defence Infrastructure Organisation** question the

robustness of the Strensall Common SAC Visitor survey underpinning the conclusions in the HRA (2019). In addition they do not consider that the HRA adequately considers the proposed mitigation available. As a result they consider that the conclusions in the HRA to remove ST35 and H59 as site allocations are flawed.

- Quod OBO **Langwith Development Partnership** consider that that the updated HRA (EX/CYC/14a) has implications for both ST15 and their proposed alternative site, Langwith. They consider that there is insufficient detail provided for ST15 to determine the likely significant effects on the Lower Derwent Valley SPA as well as the Heslington Tillmire SSSI. They consider their alternative site, Langwith, can be demonstrated to have no unacceptable biodiversity impact on the Lower Derwent Valley SPA nor the Heslington Tillmire SSSI.
- One respondent considers that the conclusions in the HRA for ST15 should be the same as ST35 given its potential for harm;
- Two respondents consider that an independent environmental assessment is required for SS13/ST15.

Modifications

N/a

11. Comments in relation to Topic Paper 1: Approach to defining York's Green Belt (Addendum, March 2019) and its associated Annexes.

Topic Paper TP1: Approach to defining York's Green Belt (Addendum, March, 2019) and associated Annexes

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this modification and/or theme:

- A number of responses state that while considering the Plan to be legally compliant, comment that it fails fundamentally to address the Green Belt issues that were well-known before the start of the plan process. Concerns include: that the approach does not comply with either the 2012 or 2019 NPPF where it proposes development that is not limited infilling in villages; that it uses weak exceptional circumstances to redefine the already detailed outer boundaries of RSS; that it is unsound to differently weight the 5 purposes of green belt.
- **Pilcher Homes Ltd** consider that, by not identifying areas of safeguarded land, CYC cannot satisfy themselves that the Plan will not need to be altered at the end of the Plan period, and that the position taken is contrary to the advice of Counsel.
- **Lime Tree Homes** questions the inclusion of 'Green Wedges' as a development exclusion zone.
- A significant number of respondents consider that the Plan's approach to removing the village of Elvington from Green Belt and allocating land in the vicinity of Elvington renders the Plan not legally compliant (in particular sites ST15 and H39). 'Exceptional Circumstances' should not be used to justify destructive development of the green belt. Elvington has made strong representations previously regarding H39 that have been ignored. Little attempt has been made to engage with residents or parish Council regarding proposals.
- A number of respondents consider that the inclusion of The Stables Elvington as an allocated site removed from Green Belt renders the Plan not legally compliant, on the following grounds: the draft allocation fails to comply with national green belt policy PPG2 and the Plan's own policies; the allocation is contrary to government policy in response to taking sites out of green belt in response to previously submitted planning applications; the allocation

reverses the decision made by inspector re: 10/02082/FUL and CYC have ignored the requirement of this decision; CYC have not engaged directly with the local community.

Soundness

Respondents that consider the plan sound in regards to the approach to defining York's Green Belt:

- **Strensall Parish Council** supports the proposed modifications to the Green Belt boundary in the vicinity of Strensall.
- **Hambleton District Council** has no issues to raise having reviewed the addendum.
- **Miller Homes, Gladman Developments and Langwith Development Group** welcome the publication of the Council's justification for its Green Belt boundaries.
- **York Wildlife Trust** considers the addendum a thorough and detailed assessment of the Green Belt.

Respondents that consider the plan unsound in regards to this modification and/or theme:

- In order to deliver identified need for Gypsy and Traveller sites, **York Travellers Trust** notes that the Plan's defined detailed Green Belt boundaries will need to be reviewed.
- **York Racecourse** states that, while broadly supportive of the Plan, the Green Belt boundary is unduly restrictive.
- Amongst others, **Northminster Ltd, Joseph Rowntree Housing Trust and William Birch and Sons Ltd** consider that the submission of evidence at this late stage renders the unsound.
- A number of respondents including **Oakgate and Airedon Planning (obo Private Landowner), Wakeford Properties, Taylor Wimpey Ltd and L and Q Estates, Northminster Ltd, Joseph Rowntree Housing Trust, The Retreat Living and William Birch and Sons Ltd** state that as submitted, the Local Plan evidence base only includes a selective review of York's Green Belt, which has been carried out retrospectively to justify a pre-existing employment (and housing) strategy.
- Amongst others, **Barratt and David Wilson Homes, O'Neill Associates (obo Private Landowners), Yorvik Homes, York and North Yorkshire Chamber of Commerce/Property Forum, Galtres Garden Village**

Development Group consider that the Council's approach misconstrues NPPF, in that York is defining boundaries for the first time rather than excluding land from the Green Belt on the basis of 'exceptional circumstances'. **O'Neill Associates (obo Private Landowners), Yorvik Homes, York and North Yorkshire Chamber of Commerce/Property Forum, Taylor Wimpey Ltd and Barwood Strategic Land II LLP, Northminster Ltd, Joseph Rowntree Housing Trust and William Birch and Sons Ltd, Galtres Garden Village Development Group, University of York, York St John University, The Retreat Living, Pilcher Homes Ltd and Thomas Pilcher Homes** further state that the failure of the Council to identify 'Safeguarded Land' and deliver a permanent Green Belt is a fundamental failing of the Local Plan.

- **Barwood Strategic Land II LLP** comment that the methodology has not been applied consistently, noting that some allocated sites sit within areas of land identified as strategic areas to keep permanently open (ref Fig 7).
- A number of comments point to the need for the Council to reconsider its methodology, which refers to the (now outdated) approach to the Green Belt Local Plan, including that due consideration be given to the primary role of York's Green Belt in safeguarding the special character and setting of the historic City and on promoting sustainable development.
- A significant number of respondents consider that the Plan's approach to removing the village of Elvington from Green Belt and allocating land in the vicinity of Elvington renders the Plan unsound (in particular sites ST15 and H39). 'Exceptional Circumstances' should not be used to justify destructive development of the green belt. Elvington has made strong representations previously regarding H39 that have been ignored. Little attempt has been made to engage with residents or Parish Council regarding proposals. Elvington Parish Council object to the methodology used to identify Green Belt boundaries such that this renders the Plan unsound.
- **Fulford Parish Council** questions the fundamental validity of the Council submitting such a volume of new evidence after the submission of the Plan. Further, the Parish Council question several aspects of the methodology used in defining detailed boundaries, including its evidencing of exceptional circumstances and application of the flawed methodology to measuring the impacts of sites on Green Belt purposes.
- **Defence Infrastructure Organisation (DIO)** is firmly of the view that the boundary defined in the submitted Plan is consistent with national planning policy requirements/objectives and is therefore sound. CYC's analysis and justification of Green Belt is flawed and the modification that it is promoting at Strensall is not sound (designating land to the south of Strensall as Green

Belt, including the site of the former Barracks); nor is it required to be made in order to render the submitted Plan sound.

- **Wakeford Properties** states that there is a lack of transparent logic or justification as to how sites are identified and their boundaries are defined. No comparison of allocated sites and not possible to confirm whether sites are the most appropriate for development.
- **The University of York and York St John University** comment that the Plan does not meet demand for identified University growth outwith the proposed 'permanent' Green Belt boundaries; the emerging Local Plan is therefore unsound. A further point is made re the Council's approach, to clarify that, rather than altering established GB boundaries through exceptional circumstances (NPPF, para 83) the Plan should refer to para 85 to deliver boundaries that ensure consistency with meeting the identified requirements for sustainable development.
- **Lime Tree Homes** questions the inclusion of 'Green Wedges' as a development exclusion zone.

As a general comment, **Harrogate Borough Council** has previously raised concerns regarding the longevity of the Green Belt boundary, noting that City of York Council will need to satisfy itself that the approach it is taking will meet the tests of soundness.

Modifications

A number of respondents consider that further detailed boundary modifications are required in order to make the Plan sound. The extent of these further changes to Green Belt boundaries is set out in Section 14.

Proposed modifications to the methodology include:

- **Historic England** request several amendments to evidence presented, along with resultant changes to the proposed Green Belt boundary. In brief this includes: more directly referencing the Heritage Topic Paper, and the elements identified by it as contributing to the special character and setting of the City; better identifying 'areas which contribute to the wider landscape setting of the city'; expanding the scope of 'Areas retaining rural setting', 'Village setting' and 'Areas preventing coalescence'; removing access to services as a determining purpose of green belt; acknowledging the likely harm from development to the primary purpose of York's Green Belt.

- **Wakeford Properties** propose that the Council should identify additional land and define the Green Belt accordingly – including the identification of small sites (under 250 dwellings) around existing settlements and main urban area would assist in meeting any delivery shortfall of larger sites early in the Plan period.
- **L+Q Estates** consider the ring road a more defensible inner Green Belt boundary.
- **Robert Pilcher** consider that land which does not serve one of the 5 purposes of Green Belt should be released for development.
- A number of responses query the lack of identified safeguarded land, suggesting that such land should be included in order to make the Plan sound, and provide a ‘permanent’ green belt boundary.
- **Retreat Living Ltd and Schoen Clinic York Ltd** state that the Council should commit to a full Green Belt review in the interests of releasing sufficient and appropriate land to meet the true housing requirement.

12. Main Issues raised in relation to the Plan's allocated sites (not subject to a Proposed Modification)

Policy SS4 / Site ST5 – York Central
Legal Compliance
There were no specific comments made on the Plan's Legal Compliance in relation to this site.
Soundness
<ul style="list-style-type: none"> • Respondents that consider the plan unsound in regards to this site: • Barton Willmore on behalf of Barratt and David Wilson Homes considers the council's assumptions about deliverability of the number of dwellings on site, the timescale in which they will be delivered and the total number of dwellings to be delivered during this plan period to be entirely unrealistic. • York Labour Group /York Labour Party / Rachel Maskell MP consider overall deliverability of the site (in terms of total capacity and time scales currently assumed) to be highly questionable and note that the type of dwellings planned do not meet the Council's identified priorities - characterized by high rent/short lets/second homes/air bnb and investor purchases, and/or by specialist student accommodation that is not available to the general market. • Rachael Maskell MP considers that York Central should be prioritising business development not residential, this would deliver long term revenue opportunities over a more sustained period of time, rather than a rapid capital receipt for housing.
Modifications
<ul style="list-style-type: none"> • Barton Willmore on behalf of Barratt and David Wilson Homes considers delivery in this plan period should be significantly reduced with some of the homes being delivered in the next plan period. • Rachael Maskell MP requests a comprehensive economic audit is undertaken to understand the potential of the site to create inward investment opportunities before further decisions are made on the nature of future development.
Suggested Alternative Boundary

n/a

Policy SS8 / Site ST4 Land Adjacent to Hull Road

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

One local resident did not consider the plan legally compliant

Soundness

Respondents that consider the plan sound in regards to this site:

- **Persimmon Homes** continue to support the allocation of this site for development.

Respondents that consider the plan unsound in regards to this site:

- Three local residents oppose the allocation due to harm to the rural character of the parish, loss of agricultural land, harm to wildlife, urgency of climate change emergency and impact on congestion / air quality.

Modifications

General modifications requested:

- Two local residents request the site is removed from the plan and retained in the green belt.

Suggested Alternative Boundary

n/a

Policy SS9 / Site ST7 – Land East of Metcalfe Lane

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- Johnson Mowatt on behalf of **Taylor Wimpey** continue their support for the allocation of ST7 though maintain objections to the proposed unnecessary separation of Site ST7 from the Main Urban Area, which is considered will make the development less, rather than more, sustainable.
- PB Planning on behalf of **TW Fields** continue to support the allocation of ST7 as a site for development though they maintain that the Proposed Modifications was a missed opportunity to resolve boundary issues around southern access to the Osbaldwick Link Road. The current boundary should be expanded in order to enhance the community and green infrastructure - three options are proposed for expansion. It is argued that expansion would help meet York's true housing need.

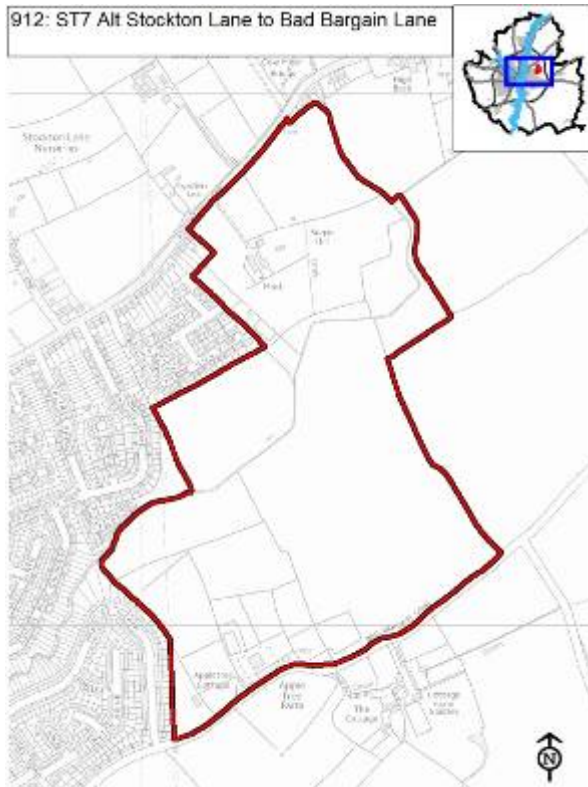
Modifications

- Johnson Mowatt on behalf of **Taylor Wimpey** propose an alternative boundary that would expand the site so that it joins the Main Urban Area, in line with previous representations.
- PB Planning on behalf of **TW Fields** propose three alternative boundaries that are all expansions of the site in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters. Option 1 is for 845 homes, option 2 is for 975 homes and option 3 is for 1,225 homes.
- Barton Willmore on behalf of Barratt and **David Wilson Homes** request the site is expanded in order to meet York's true housing need.
- One local resident requests the site is expanded in order to support amenities and transport links to the city centre.

Suggested Alternative Boundary

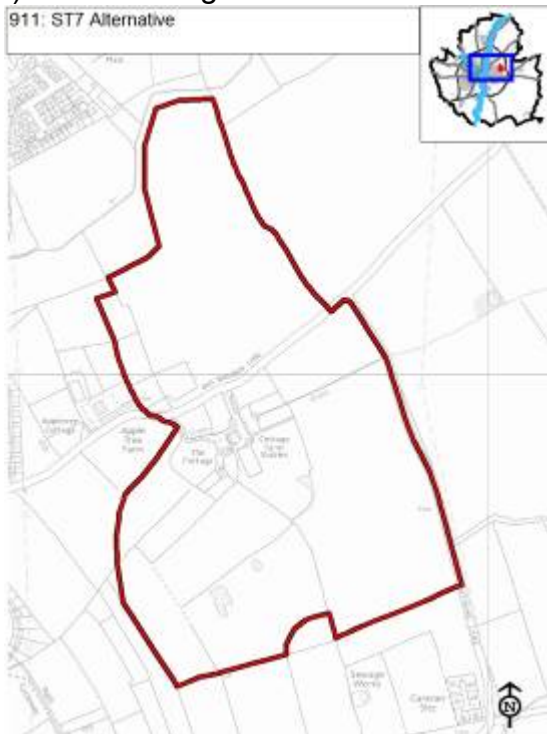
(Maps produced by Forward Planning. Crown Copyright. City of York Licence No. 1000 20818)

Taylor Wimpey UK Ltd suggest a northern boundary:



PB Planning on behalf of **TW Fields** suggest the following boundary alternatives:

1) 925 dwellings



2) 1,225 dwellings

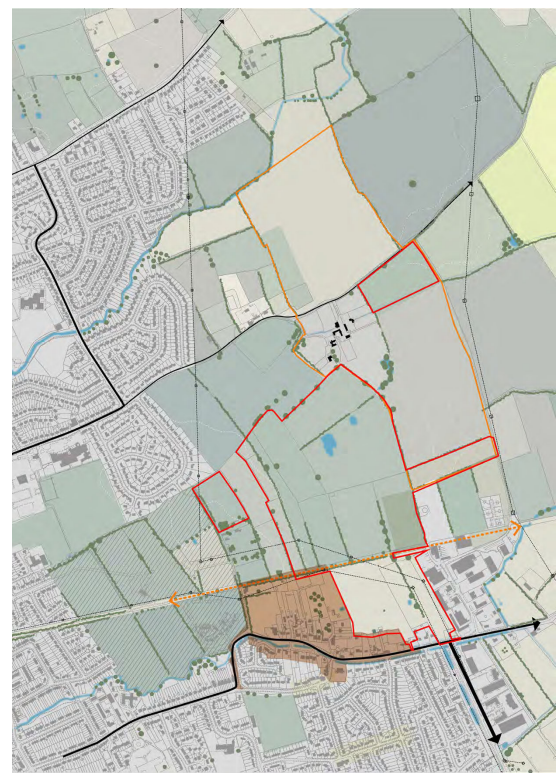


3) 845 dwellings

ST7 - City of York Strategic Land



Barton Wilmore on behalf of **Barratt and David Wilson Homes** suggest a south-western & southern extension to ST7 (red line)



Policy SS10 / Site ST8 – Land North of Monks Cross

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Redrow Homes and Private Landowners** support the allocation of ST8; planning consent is currently pending consideration (18/00017/OUTM).
- **Michael Glover LLP and Private Landowners** support the allocation of ST8.

Respondents that consider the plan unsound in regards to this site:

- **Michael Glover LLP and Private Landowners** object to the western boundary of ST8. Site boundary should be expanded in order to meet York's true housing need.

Modifications

- **Michael Glover LLP and Private Landowners** request site boundary is extended to include land immediately to the west of current allocation.

Suggested Alternative Boundary

Michael Glover LLP and Private Landowners suggest the following western extensions to ST8.



Policy SS11 / Site ST9 – Land North of Haxby

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Linden Homes Strategic Land** continue to support the allocation of this site.

Respondents that consider the plan unsound in regards to this site:

- **Parochial Church Council St Mary's Haxby** opposes the development due to the increased strain on local facilities and infrastructure. Development is not large enough to attract a new GP practice.

Modifications

There were no specific comments made proposing modifications to this site.

Suggested Alternative Boundary

n/a

Policy SS12 / Site ST14 – Land West of Wigginton Road

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Barratt Homes, David Wilson Homes and TW Fields** continue to support allocation of this site though request an expansion of the site in order to meet York's true housing need.

Respondents that consider the plan unsound in regards to this site:

- **Parochial Church Council St Mary's Haxby** opposes the development due to the increased strain on local facilities and infrastructure. Development is not large enough to attract a new GP practice.

Modifications

Comments from specific bodies:

- **Barratt Homes, David Wilson Homes and TW Fields** propose three different options for expansion of the site. Option 1 for 1,350 homes, option 2 for 1,725 homes and option 3 for 2,200 homes.
- **York Labour Group** propose expanding this site along with one other in order to create a small number of sustainable green village developments to meet both quantity and quality of provision need.

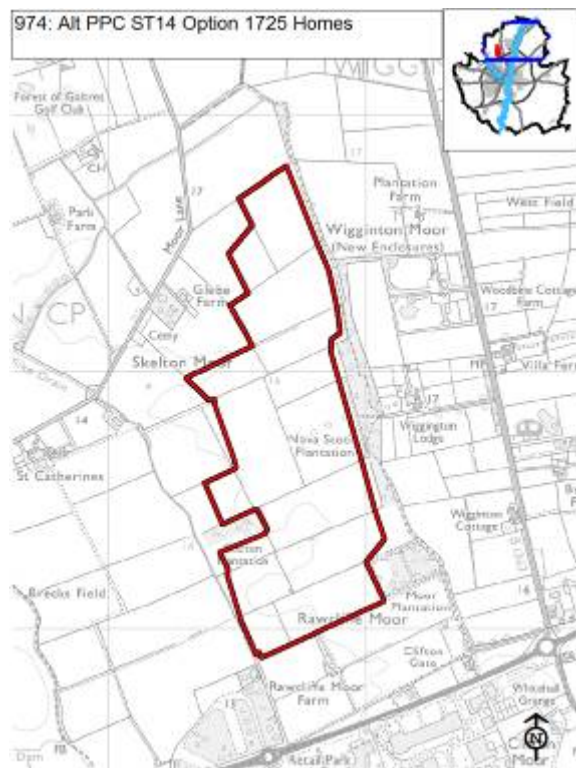
Suggested Alternative Boundary

Barratt Homes & David Wilson Homes and TW Fields suggest 3 boundary alternatives:

1) 1350 dwellings



2) 1725 dwellings



3) 2200 dwellings



Maps produced by Forward Planning. Crown copyright. City of York licence No. 1000 20818.

Policy SS13 / Site ST15 – Land West of Elvington Lane

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

- **Heslington Parish Council** question the rationale for allocation of a large green belt site with new infrastructure versus several smaller developments closer to existing settlements. Also highlight 2017 comments from Natural England about threats to Heslington Tillmire SSSI and question if this has been responded to. Notes it has not been proved that compensation / mitigation area will protect the SSSI and that no independent environmental study of the whole green belt area SE of Heslington Village and its relationship to, and impact on, the Tillmire SSSI, appears to have been done.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Highways England** still require details of any traffic mitigation required along

the A64 and those which take account of proposed access arrangements to the Strategic Road Network for ST15.

Respondents that consider the plan unsound in regards to this site:

- **Heslington Parish Council** raise issue appraisal in HRA and consider a new environmental report is required to understand effects on SSSI and arable land. They also question why the site hasn't been reduced in size following reduction in OAHN. Also take issue with vagueness of transport plans, no clarity on protection of quiet lanes and access for residents. Questions whether this development will cater to York's needs or just be a dormitory town for elsewhere. Concern for impact on historic nature of Heslington and its identity.
- **York Labour Group** are opposed to the lack of detailed strategy for integrating the development of brownfield and greenfield developments into a coherent whole. Also frustrated by general absence of detail on sustainability. No work has been carried out by the Council to explore the options for future development, no evaluation on the impact of brownfield policies or the potential to create a small number of truly sustainable "green villages".
- **Langwith Development Group** note there is insufficient detail provided for ST15 to determine the likely significant effects on the Lower Derwent Valley SPA as well as the Heslington Tillmire SSSI. ST15 and ST33 could undermine conservation objectives for the breeding and non-breeding birds of the Lower Derwent Valley and that a likely significant effect cannot be ruled out - policy must be screened in and an appropriate assessment is required. Consider the promotion of OS10 for both recreation and compensation for loss of biodiversity to be two incompatible objectives. Notes that the proposed access road will also go through OS10. Considers the delivery trajectory to be unrealistic - earliest homes could be delivered by 2022/23 and average annual delivery rate to be overly ambitious. Site boundary is unsound and this site in conjunction with others cannot meet York's true housing need.
- **Retreat Living** question the rationale behind release of green belt land for such a large site.

General comments in support:

- Support for one large development rather than many smaller developments detracting from many villages.

General comments in opposition:

- Concern about impact on historical character of Heslington and surrounding villages.
- Concern that documents are vague on nature of access roads and if quiet country lanes will be protected. Concern about congestion, road safety and air pollution.
- Suggested nature reserve at OS10 is laudable but misguided as proximity to new development with the attendant noise / air / light pollution will harm wildlife as will all the cats / rats / foxes that will be attracted to the new development.
- Concern about loss of airfield for historical value and recreational purposes.
- Concern about distance to A64, locating nearer the ring road would create clear separation between the site and Heslington.
- Concern that the site is not suited for commuting to York and will instead become a dormitory town for people who work elsewhere.
- Concern that in the medium-long term the settlement will induce sprawl out from Elvington.
- Concern at the loss of agricultural land
- Concern at loss of green belt land.
- Concern at harm to Tillmire SSSI.
- Concern about the size of development, questions why it has not been reduced following reduced OAHN.

Modifications

Comments from specific bodies:

- **Langwith Development Group** request the site be removed as an allocation and replaced by their site which is in the same vicinity which would avoid harm to Tillmire SSSI, has existing road provision which would allow development to begin sooner and reduce the amount of greenfield land being developed.
- **Heslington Parish Council** request the site make greater use of the brownfield site (Elvington airfield), be smaller and more towards Elvington Lane for access and have a buffer zone all round. Providing access via the existing road to Elvington Lane would leave current Heslington residents' access to their village intact as well as protecting the SSSI and conserving arable land and associated businesses.
- **Elvington Parish Council** request the development is moved away from Elvington and Wheldrake, would like the airfield to be retained. Allocation should be for the originally proposed site alongside the A64 and adjacent to the proposed new junction. Request more information on proposed site access and infrastructure generally.

- **York Labour Group** would like to see the site expanded in order to create a truly sustainable self-contained development.

General modifications requested:

- Remove the site from the plan.
- Increase size of development in order to create a truly self-contained development.
- Reduce size of development in line with reduced OAHN.
- Remove allocation and replace with a limited expansion on the edge of Elvington.
- Provide gypsy and traveller pitches as part of the development.
- Move site to original allocation closer to the ring road, would allow the airfield to be retained and reduce traffic issues.
- An independent study to demonstrate no harm to Tillmire SSSI.

Suggested Alternative Boundary

Langwith Development Group (from Publication Draft Submission)

Figure 8: Land Parcels making up Langwith

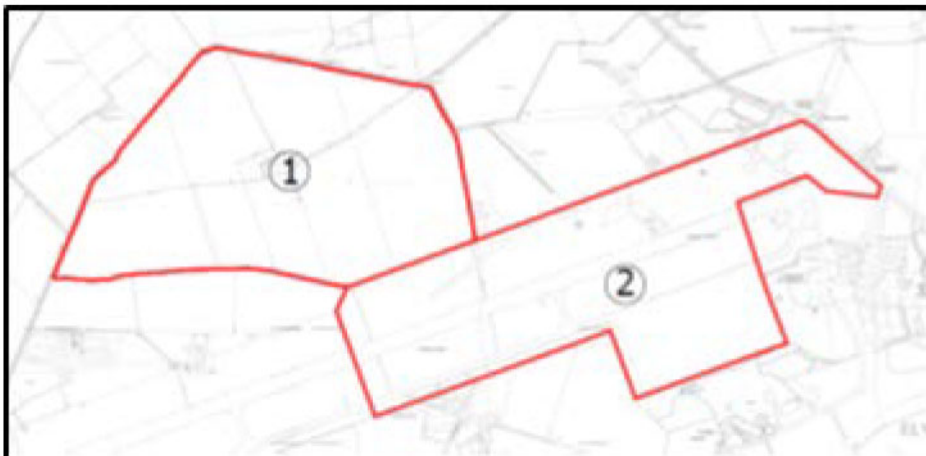


Figure 10: Habitat Creation and Enhancement Areas



Policy SS14 / Site ST16 – Terry’s Extension Sites

Legal Compliance

There were no specific comments made on the Plan’s Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **McCarthy & Stone** support allocation of the site.
- An individual commenting considers the plan to be sound but would like to see Site 719 Terry’s Car Park [ST16a] allocated for medical facilities to alleviate demand caused by development at former Terry’s Factory.

Modifications

- **McCarthy & Stone** request the specific policy wording be amended in order to maximise the delivery of much needed homes for older people in the City. Suggested amendments include: the reference to "Be of a low height" should be removed or amended to solely read "Complement existing views to the factory building and clock tower from the Ings, Bishopthorpe Road and the Racecourse"; the proposed site capacity should reflect ongoing pre-application discussions, especially given the acute housing needs for older people that the development proposal seeks to deliver.
- An individual would like to see Site 719 Terry’s Car Park [ST16a] allocated for medical facilities to alleviate demand caused by development at former Terry’s Factory and to reinstate facilities originally included in the outline planning application but has since been removed.

Suggested Alternative Boundary

n/a

Policy SS16 / Site ST31 – Land at Tadcaster Road

Legal Compliance

There were no specific comments made on the Plan’s Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Gladman Developments** support the continued allocation of this site and

<p>confirm the site's planned delivery rate, its availability and deliverability. Note that it can contribute to the council's Five Year Land Supply.</p> <ul style="list-style-type: none"> • Copmanthorpe Parish Council and Cllr Carr support the principle of an allocation in this location as it is identified in the emerging Neighbourhood Plan. <p>Respondents that consider the plan unsound in regards to this site:</p> <ul style="list-style-type: none"> • Barratt and David Wilson Homes support the council's general approach to allocation but object to allocation of sites in Copmanthorpe given that their site (Former ST12 Manor Heath, Copmanthorpe) scored better than ST31 Land at Tadcaster Road on the council's Green Belt Strategic Assessment but was not allocated whereas this site was. • Copmanthorpe Parish Council and Cllr Carr object to the scale of development at 158 dwellings. They consider this figure should reduce to reflect the neighbourhood plan and lower OAN figure. It is considered reasonable request given that policy H2 notes densities are only indicative and leniency is given in order for densities to be informed by the local area, would also be in-keeping with the neighbourhood plan.
Modifications
<ul style="list-style-type: none"> • Copmanthorpe Parish Council request that in light of the reduced OAHN the capacity of this site should be reduced from 158 to 75 dwellings. • Three local residents and Cllr David Carr, reiterate the Parish Council's request for capacity of the site to be reduced to 75 dwellings.
Suggested Alternative Boundary
n/a

Policy SS18 / Site ST33 – Station Yard Wheldrake

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

No comments were received through this consultation that considered the site allocation sound.

Respondents that consider the plan unsound in regards to this site:

- Two local residents consider the boundary around Wheldrake taken from the 2005 Draft Local Plan in the Addendum to Topic Paper 1 to be incorrect. Land to the north of North Lane (Former H28) is designated as housing and not part of the Green Belt in appendix J of the 2005 Plan. The evidence base for this should also include the York Green Belt Archives Y/PPT/2/5/192 as that

<p>shows how these greenbelt boundaries were drawn up by a Planning Inspector on the back of a public inquiry.</p> <ul style="list-style-type: none"> • Two local residents consider that sites such as ST33 have had subsequent employment developments completed and plans for it show there was never any intention of utilising land for residential development - this constitutes a significant material change to the allocation of ST33 that is also supported by the Wheldrake Green Belt description in Annex 4. • Two residents also considered that ST33 when submitted as former site allocation H49 failed to achieve enough points for access to services - this is not a suitable allocation and goes against the 2012 & 2019 NPPF that state village development should be of restricted infill, this or neither. • Two local residents consider the detailed boundaries issue for ST33 is inaccurate and conflicts with the GB Boundary description for Wheldrake and the Planning Inspectors comments from the York Green Belt Report. <p>General comments:</p> <ul style="list-style-type: none"> • One local resident feels submissions made by Wheldrake Parish Council have been ignored and their concerns not listened to. Feels allocation is incompatible with council climate change policy. (Concerns of the Parish Council include harm to character of village, capacity of local school, impacts on traffic, proximity of the site to Wheldrake industrial estate and loss of agricultural land.)
Modifications
<p>General modifications requested:</p> <ul style="list-style-type: none"> • Request that site is removed from the plan as an allocation. • Request that the whole approach to defining the York Green Belt be restarted otherwise it fails to comply with the Yorkshire and Humberside RSS revocation order, the Yorkshire and Humberside RSS saved polices and parts of the 2012, 2018/2019 NPPF where development in villages is not limited infill.
Suggested Alternative Boundary
n/a

Policy SS20 / Site ST36 – Imphal Barracks
Legal Compliance
There were no specific comments made on the Plan's Legal Compliance in relation to this site.
Soundness
Respondents that consider the plan unsound in regards to this site:

- **Defence Infrastructure Organisation** support the allocation of the site but consider the way the green belt boundary is defined in the vicinity of this site to be erroneous. Walmgate Stray may play a role in preserving the setting of historic York, but the developed parts of the Barracks do not; because the Barracks is already developed. Using Green Belt policy to prevent redevelopment would not encourage further urban regeneration. This land is not open and is not characteristic of Green Belt.
- **York Labour Group** say they have urged caution around dependence on this site due to concerns about whether it will be delivered. They consider that this advice has been ignored.

Modifications

- **Defence Infrastructure Organisation** consider the way the green belt boundary is defined in the vicinity of this site to be erroneous. The allocation should be extended / Green Belt boundary should be redrawn to the east around the designation for Walmgate Stray.

Suggested Alternative Boundary

Defence Infrastructure Organisation request the green belt's inner boundary is redrawn around Walmgate Stray immediately to the east of the site as shown below.



Policy SS21 / ST26 – Land South of Airfield Business Park, Elvington

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- **Elvington Parish Council** support the site as proposed but emphasise the need for detailed archaeological and ecological assessments before development. A gap should be made between the existing and the new estates which would allow for a 'wildlife corridor'. Units should be small, high value businesses consistent with a restriction to B1 and B8 use, as at present, and in line with the council's economic strategy. Support is conditional on the imposition of a 7.5 tonne weight limit on Main Street (i.e. the road through the village centre). There are a disproportionately large number of HGV movements through the village impacting on the safety of pedestrians and cyclists – particularly children walking and cycling to/from school. The extra traffic generated by ST26 (and E9) would bring further unacceptable HGV traffic passing through the village.
- Two local residents express support for this allocation on the basis of jobs it will provide.

Modifications

- Two local residents request detailed archaeological and ecological assessment to be done prior to development. Units to be small, high value businesses. As too many HGVs travel through village, posing a risk to pedestrians, a restriction to 7.5 tonne maximum should be imposed. Any traffic from E9 and ST26 must travel to the A1079 roundabout at Grimston Bar rather than through village.

Suggested Alternative Boundary

n/a

Policy SS22 / Site ST27 University of York Expansion

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

- **Heslington Parish Council** consider allocation an infringement of the planning agreement following the Secretary of State approval in 2007 of Heslington East for York University to include a clear landscape buffer between the university site and Heslington Village. There is no evidence that the existing Science Park is being fully used and requires a second site. Also

consider there to be a contradiction between the stated preference for a garden settlement away from existing settlements (ST15) to avoid developmental spread alongside the A64 and this proposal for University Expansion (ST27).

Soundness

Respondents that consider the plan unsound in regards to this site:

- O'Neill Associates on behalf of **University of York** considers that insufficient consideration has been given to the university's growth and physical expansion needs for the future, in advance of Green Boundaries being identified. It has a permanent presence in this locality. Inhibiting its legitimate expansion needs would negate policies ED3, SS22 and EC1 being implemented as intended by the City Council, with detriment to academic and economic strategies in the city, the region and nationally. Consideration of alternative expansion locations and their support for the whole 26ha being available for development has been fully addressed in their 2018 representations with the conclusion that no other site is feasible for the operation of the University.
- **Heslington Parish Council** question the evidence and rationale for supporting the additional need and capacity for an employment site at the university. They raise concerns in relation to local wildlife sites and request an independent environmental assessment. They also raise concern at loss of productive agricultural land and green belt.
- Question the need for and oppose the expansion of University as it is existing land fully utilised.
- Concern at loss of buffer to surrounding villages and A64.
- Concern at harm to character of Heslington village.
- Concern at development of green belt land, comments that brown field should be prioritised.
- Concern at loss of agricultural land.
- Concern at increase in traffic, congestion and air pollution. Quiet country lanes unsuited to increase in traffic will become dangerous or be widened / lost.
- Concern at lack of adequate public transport links.
- Comments that development cannot be justified in light of climate change emergency.

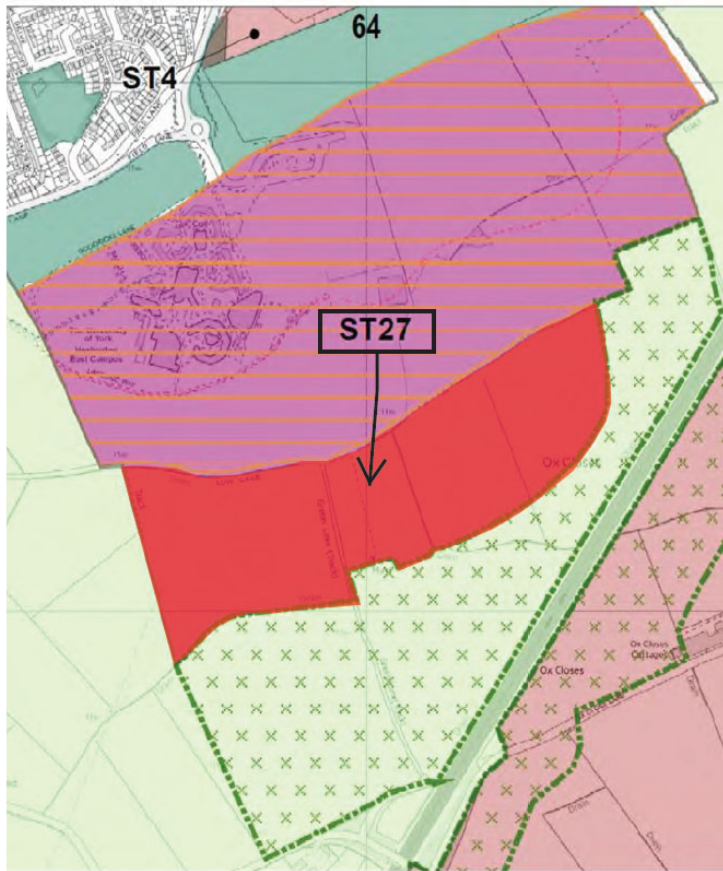
Modifications

- **University of York** considers the current allocation at ST27 inadequate to meet expansion needs for the full plan period and considers it necessary that that 26ha site south of the Campus East lake is included in the plan as an allocation for development. Proposes a further piece of land controlled by the university (shown on plan 1.5 in appendix 1 of rep) is designated as safeguarded land.
- Local residents request the site is removed from the plan as an allocation for

development.

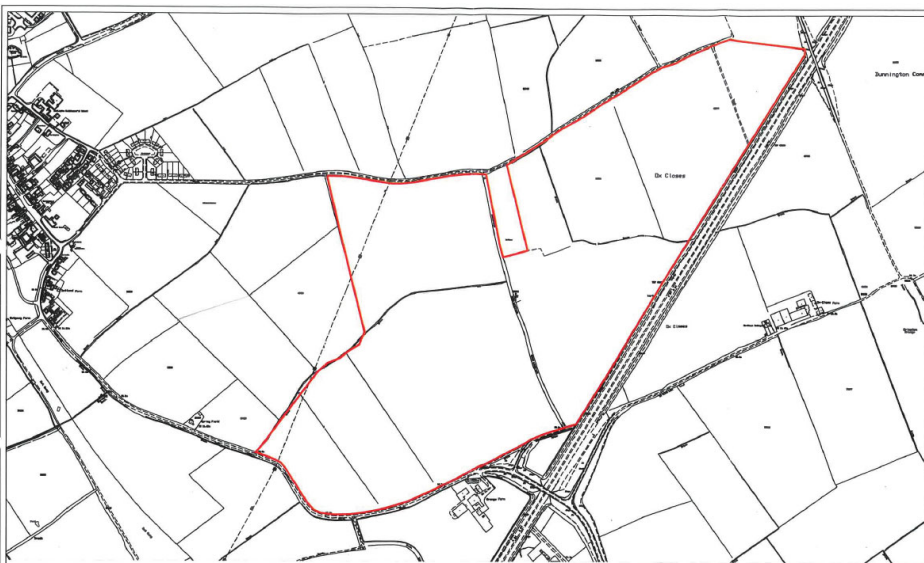
Suggested Alternative Boundary

University of York suggest the following alternative boundary for ST27.



■ University proposed extension area

University of York suggest the following Safeguarded Land boundary for expansion of the university.



Heslington East Development
Pre-emptive agreement to acquire land South of Low Lane
Boundary of the land to which the agreement applies - Plan 3

Policy SS23 / Site ST19 – Land at Northminster Business Park

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

- **Cllr Anne Hook** on behalf of residents of Rural West York ward stresses allocation of this site representing expansion of the Northminster Business Park beyond its 2017 boundary would not be supported as made clear by the Poppleton Neighbourhood Plan. Deems this a betrayal of local democracy and feels no exceptional circumstances have been demonstrated, as such allocation violates the 2011 Localism Act.
- Local residents echo the same concern as Cllr Anne Hook in regards to allocation overriding the Poppleton Neighbourhood Plan.

Soundness

Respondents that consider the plan unsound in regards to this site:

- **Cllr Anne Hook** is concerned that allocation would put a larger section of the green belt between the A1237 and edge of Acomb at risk. Concerns around increased traffic, congestion, air pollution and impact on local residents. Brownfield land should be prioritised and this is not an exceptional case that justifies development of green belt land.
- Local residents express many of the same concerns as Cllr Anne Hook – impact on residents quality of life, traffic congestion, lack of exceptional circumstances, loss of green belt land, harm to character of the local area and development encouraging sprawl in future.

Modifications

- **Cllr Anne Hook** requests the site is removed from the plan as an allocation for development. Considers its allocation violates 2011 Localism Act as not supported by Poppleton Neighbourhood Plan.
- Local residents also request the site is removed from the plan as an allocation for development.

Suggested Alternative Boundary

n/a

Site H7 Bootham Crescent

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- PB Planning on behalf of **Persimmon Homes** support allocation of this site.

Modifications

There were no specific comments proposing modifications to this site.

Suggested Alternative Boundary

n/a

Site H29 – Land at Moor Lane, Copmanthorpe

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

There were no specific comments made on the Plan's Soundness in relation to this site.

Modifications

- **Copmanthorpe Parish Council** request that in light of reduced OAHN the number of dwellings on site should be reduced from 88 to 60 as this would be in-keeping with the density of existing developments. This would comply with policy H2 as densities listed are only indicative and it is acknowledged development density should be informed by existing character of the local area.
- Four local residents, one of which is **Cllr David Carr**, re-iterate the point about reducing the capacity of the site in light of reduced OAHN and local

density of development.
Suggested Alternative Boundary
n/a

Site H31 – Eastfield Lane Dunnington

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- Two local residents oppose development of the site as the plan should prioritise brownfield land, development would harm amenity of the village, increase traffic, harm drainage, harm wildlife and occupy productive agricultural land. Also oppose development as part of the site is currently in commercial use so would result in a loss of jobs.

Modifications

- Two local residents request the site is removed from the plan as an allocation for development and retained as green belt.

Suggested Alternative Boundary

n/a

Site H38 - Land RO Rufforth Primary School Rufforth

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- DPP on behalf of **Linden Homes Strategic Land** supports continued

allocation of site H38 Rufforth Primary School
Modifications
<ul style="list-style-type: none"> • There were no specific comments proposing modifications to this site.
Suggested Alternative Boundary
n/a

Site H39 – North of Church Lane Elvington

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

- Local residents consider that Elvington Parish Council has not been listened to or engaged with.
- One local resident considers 'exceptional circumstances' an illegitimate grounds for removing land from the Green Belt.

Soundness

Respondents that consider the plan unsound in regards to this site:

- Fourteen local residents opposed development due to loss of Green Belt land, absence of exceptional circumstances, increase in traffic, harm to amenity of the village and existence of more suitable sites for development (H26 or expansion of ST15 Land West of Elvington Lane are both mentioned).
- One local resident raises concern about the need for a buffer zone to protect local wildlife at hedgerow E50 and Derwent Ings SSSI.

Modifications

- Of the fourteen local residents opposed to development of this site six of them propose H26 Dauby Lane as a more suitable alternative, one mentions expanding ST15 Land West of Elvington Lane. Eight just request the site is retained as green belt land.

Suggested Alternative Boundary

n/a

Site H53 – Land at Knapton Village

Legal Compliance

There were no specific comments made on the Plan's Legal Compliance in relation to this site.

Soundness

Respondents that consider the plan sound in regards to this site:

- Indigo Planning on behalf of Novus Investments support allocation of this site but disagree with inclusion of Knapton Village within the green belt.

Modifications

There were no specific comments proposing modifications to this site.

Suggested Alternative Boundary

n/a

SP1 – The Stables Elvington

Legal Compliance

Respondents have commented on the Plan's Legal Compliance in relation to this site:

- One local resident is opposed on the grounds that allocation is not compliant with National Policy Green Belt PPG2 or National Policy for Travellers (Policies) B, C, D, E & F. Also against government policy to remove land from Greenbelt in response to previous applications - the proposals directly reverse a decision made by the Planning Inspectorate 10/02082/FUL made for a single site.

Soundness

Respondents that consider the plan unsound in regards to this site:

- Six local residents oppose the allocation of this site as it has previously been

refused permission, would have a detrimental impact on the village and would weaken green belt characteristics of the surrounding area.
Modifications
<ul style="list-style-type: none"> Seven local residents request the site is removed from the plan.
Suggested Alternative Boundary
n/a

E9 – Elvington Industrial Estate
Legal Compliance
<ul style="list-style-type: none"> There were no specific comments made on the Plan's Legal Compliance in relation to this site.
Soundness
<p>Respondents that consider the plan sound in regards to this site:</p> <ul style="list-style-type: none"> Two residents support anything bringing jobs to local economy. Respondents thinks site is paddock and not brown field site <p>Respondents that consider the plan unsound in regards to this site:</p> <ul style="list-style-type: none"> One resident believes character of the village will be radically changed by the proposed development and does not have the infrastructure to cope. One resident objects to Elvington Industrial Estate.
Modifications
<ul style="list-style-type: none"> Two residents want some form of traffic management plan to limit number of HGVs travelling through the centre of the village. One resident requests removal of E9 Elvington Industrial Estate from the Plan
Suggested Alternative Boundary
n/a

13. Alternative Sites proposed through consultation

- 13.1 The following sites were submitted in response to consultation on the Local Plan Proposed Modifications 2019. The sites are presented here without prejudice to future discussion about their status, nor to the implications for, or any resulting changes to, the Green Belt boundary.
- 13.2 Where maps have not been included in the submission, we have included, where applicable and for information, the boundary from previous submissions or as recorded by CYC.

Contents

FORMER ST11 – NEW LANE, HUNTINGTON	115
PMSID 339 BARTON WILLMORE OBO BARRATT & DAVID WILSON HOMES.....	115
FORMER ST12 – MANOR LANE, COPMANTHORPE	117
PMSID 339 BARTON WILLMORE OBO BARRATT & DAVID WILSON HOMES.....	117
PMSID 376 ELG PLANNING OBO TAYLOR WIMPEY	117
FORMER ST13 – LAND OFF MOOR LANE, COPMANTHORPE	119
PMSID 600 DPP OBO SHEPHERD HOMES	119
FORMER ST29 – LAND AT BOROUGH BRIDGE ROAD	120
PMSID 894 CARTER JONAS OBO KARBON HOMES.....	120
FORMER H2A – RACECOURSE STABLES	121
PMSID 91 STRATHMORE ESTATES OBO WESTFIELD LODGE AND YALDARA LTD	121
PMSID 122 TURNBERRY OBO YORK RACECOURSE	121
FORMER H2B - LAND AT CHERRY LANE	122
PMSID 91 STRATHMORE ESTATES OBO WESTFIELD LODGE AND YALDARA LTD	122
PMSID 587 O'NEILL ASSOCIATES OBO SHEPHERD HOMES	122
FORMER H26 – LAND AT DAUBY LANE, ELVINGTON	123
PMSID 867 DPP OBO YORVIK HOMES.....	123
FORMER H27 – LAND AT THE BRECKS , STRENSALL	125
PMSID 607 LICHFIELDS OBO TAYLOR WIMPEY LTD.....	125
FORMER H28 - NORTH OF NORTH LANE, WHELDRAKE	127
PMSID 91 STRATHMORE ESTATES OBO WESTFIELD LODGE AND YALDARA LTD –	127
PMSID 866 DPP OBO MULGRAVE PROPERTIES	127
PMSID 918 ROBERT PILCHER	127
FORMER H33 – LAND AT CHURCH BALK, DUNNINGTON	128
PMSID 592 O'NEILL ASSOCIATES OBO YORVIK HOMES	128
FORMER H34 - LAND TO THE NORTH OF CHURCH LANE SKELTON	129

PMSID 601 DPP OBO PRIVATE LANDOWNER OF FORMER H34	129
FORMER H37 – LAND ADJACENT GREYSTONE COURT, HAXBY	130
PMSID 91 STRATHMORE ESTATES OBO WESTFIELD LODGE AND YALDARA LTD -	130
FORMER H50 – LAND AT MALTON ROAD	132
PMSID 895 CARTER JONAS OBO BANKS PROPERTY LTD.....	132
FORMER H54 – WHITELAND FIELD, USHER PARK ROAD, HAXBY	133
PMSID 125 PERSIMMON HOMES	133
FORMER SF1 - SOUTH OF STRENSALL VILLAGE	134
PMSID 260 PEGASUS GROUP OBO LEVEL DEVELOPMENTS LTD	134
FORMER SF4: NORTH OF HAXBY.....	136
PMSID 598 DPP OBO LINDEN HOMES STRATEGIC LAND	136
FORMER SF5: WEST OF MOOR LANE, COPMANTHORPE.....	137
PMSID 220 O'NEILL ASSOCIATES OBO PRIVATE LANDOWNER	137
FORMER SF10: RIVERSIDE GARDENS, ELVINGTON.....	139
PMSID 91 STRATHMORE ESTATES OBO WESTFIELD LODGE AND YALDARA LTD.....	139
FORMER SF12: MOOR LANE, WOODTHORPE	140
PMSID 581 AVISON YOUNG OBO BARWOOD STRATEGIC LAND II LLP.....	140
PMSID 125-5 PERSIMMON HOMES.....	140
FORMER SF15 - LAND NORTH OF ESCRICK.....	143
PMSID 598 DPP OBO LINDEN HOMES STRATEGIC LAND	143
SITE 4 – LAND AT NORTH LANE, HUNTINGTON	144
PMSID 357 ID PLANNING OBO GREEN DEVELOPMENTS	144
SITE 76 - DUNCOMBE FARM, STRENSALL.....	145
PMSID 870 PRIVATE LANDOWNER	145
SITE 141 – NORTHFIELDS PLAYING PITCHES	146
PMSID 901 O'NEILL ASSOCIATES OBO YORK ST JOHN UNIVERSITY	146
SITE 165 – WESTFIELD LANE, WIGGINTON	147
PMSID 125-7 PERSIMMON HOMES.....	147
SITE 170 – POND FIELD, HESLINGTON	148
PMSID 125-4 PERSIMMON HOMES.....	148
SITE 171 - LIME TREE FARM HESLINGTON	149
PMSID 125 PERSIMMON HOMES.....	149
SITE 191 – LAND AT AVON DRIVE (ALTERNATIVE BOUNDARY 968)	150
PMSID 826 – THOMAS PILCHER HOMES AND PMSID 827 PILCHER HOMES.....	150
PMSID 917 & 918 PRIVATE LANDOWNERS –	150

SITE 221 – AGRICULTURAL LAND, SIM BALK LANE	151
PMSID 181 GATELEY LEGAL OBO GATEWAY DEVELOPMENTS (YORK) LIMITED	151
SITE 222 – AGRICULTURAL LAND, SIM BALK LANE	152
PMSID 181 GATELEY LEGAL OBO GATEWAY DEVELOPMENTS (YORK) LIMITED	152
SITE 223 – AGRICULTURAL LAND, COPMANTHORPE LANE, BISHOPTHORPE	153
PMSID 181 GATELEY LEGAL OBO GATEWAY DEVELOPMENTS (YORK) LIMITED	153
SITE 224 – AGRICULTURAL LAND, CHURCH LANE, BISHOPTHORPE.....	154
SITE 737 – STOCK HILL FIELD, WEST OF CHURCH BALK, DUNNINGTON.....	156
PMSID 890 JOHNSON MOWATT OBO YORVIK HOMES	156
SITE 787 – LAND TO THE SOUTH OF STOCKTON LANE.....	157
PMSID 125-6 PERSIMMON HOMES.....	157
SITE 861 AND 862 – LAND AT THE RETREAT, HESLINGTON	158
PMSID 603 SAVILLS (UK) LTD OBO RETREAT LIVING LTD	158
PMSID 916 CARTER JONAS OBO SCHOEN CLINIC YORK LTD/ THE RETREAT LIVING	158
SITE 871– LAND AT NORTH FIELD, YORK	160
PMSID 604 CARTER JONAS OBO L & Q ESTATES (FORMERLY GALLAGHER ESTATES)	160
SITE 873 – LAND TO THE EAST OF THE DESIGNER OUTLET	161
PMSID 141 AVISON YOUNG OBO OAKGATE.....	161
SITE 882 – ASKHAM LANE ACOMB	163
PMSID 598 DPP OBO LINDEN HOMES STRATEGIC LAND	163
SITE 891/922/964– GALTRES GARDEN VILLAGE.....	164
PMSID 376 -1 ELG PLANNING OBO TAYLOR WIMPEY	164
PMSID 620 O'NEILL ASSOCIATES OBO GALTRES GARDEN VILLAGE DEVELOPMENT GROUP	164
PMSID 91 STRATHMORE ESTATES OBO WESTFIELD LODGE AND YALDARA LTD	164
SITE 897 – LAND ADJACENT TO LANDING LANE HAXBY	166
PMSID 214 O'NEILL ASSOCIATES OBO PRIVATE LANDOWNERS	166
SITE 942 – LAND WEST OF CHAPELFIELDS	167
PMSID 182 JOHNSON MOWATT OBO KCS DEVELOPMENT	167
SITE 952– LAND NORTH OF NORTHMINSTER BUSINESS PARK	168
PMSID 354 PETER VERNON AND CO.....	168
SITE 957 – MALTON ROAD INDUSTRIAL ESTATE	169
PMSID 589 O'NEILL ASSOCIATES OBO MALTON ROAD DEVELOPMENTS.....	169
SITE 959 – KETTLESTRING LANE, CLIFTON MOOR	170
PMSID 350 CARTER JONAS OBO PICTON CAPITAL	170
SITE 970 – LAND AT PRINCESS ROAD	171
PMSID 210 LICHFIELDS OBO WAKEFORD PROPERTIES.....	172

SITE 971– LAND AT SOUTHFIELDS ROAD	173
PMSID 210 LITCHFIELD’S OBO WAKEFORD PROPERTIES	173
SITE 995 – POPPLETON GLASSWORKS.....	174
PMSID 218 JLL OBO INDUSTRIAL PROPERTY INVESTMENT FUND (IPIF).....	174
SITE 982 – RACECOURSE GREENHOUSES	175
PMSID 122 TURNBERRY OBO YORK RACECOURSE	175
NEW SITE – LINDUM BUSINESS PARK, ELVINGTON.....	177
PMSID 859 FREETHS LLP OBO THE LINDUM GROUP LTD	177
SITE 804 - CLIFTON GYPSY AND TRAVELLER SITE	179
PMSID 60 MICHAEL HARGREAVES PLANNING ON BEHALF OF THE TRAVELLERS TRUST.....	179

Former ST11 – New Lane, Huntington

Summary

PMSID 339 Barton Willmore OBO Barratt & David Wilson Homes

Site at New Lane, Huntington (ST11) should be included in the plan as an allocation for development in order to meet York's true housing need and provide a permanent green belt boundary. If not included as an allocation for development then at a minimum the site should be excluded from the green belt, either as white land or allocated as safeguarded land for future development.

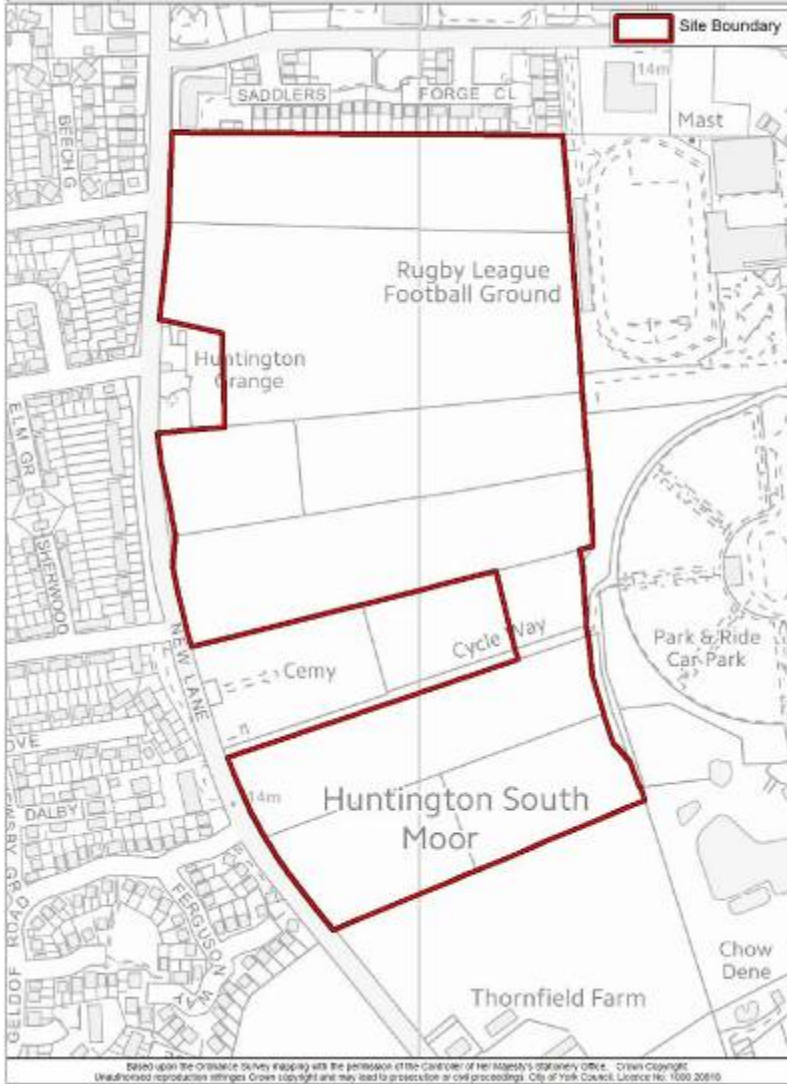
Site Plan showing proposed modifications, where relevant

PMSID 339 Barton Willmore OBO Barratt & David Wilson Homes – Site plan submitted confirmed proposed site boundary at site 155.



NB: The proposed boundary differs from Former ST11 proposed by CYC (site 320), included below for information:

Site Ref: 320



Former ST12 – Manor Lane, Copmanthorpe

Summary

PMSID 339 Barton Willmore OBO Barratt & David Wilson Homes

The plan should rightly inset Copmanthorpe but not draw a boundary simply around the extremities of the settlement. Should the Council follow its own methodology, the Green belt boundary would exclude land to the west of Copmanthorpe, including our Clients land at Manor Heath, Copmanthorpe (ST12). This land should then either be allocated, remain as white land or be allocated as safeguarded land.

PMSID 376 ELG Planning OBO Taylor Wimpey

Respondent seeks release of land at Manor Heath Road which was previously identified by Council (ST12) but not carried forward to publication of draft plan. The land is in a suitable, sustainable location, fundamentally viable and available now for short term delivery.

Site Plan showing proposed modifications, where relevant

PMSID 339 Barton Willmore OBO Barratt & David Wilson Homes – Submitted site boundary confirmed as site 213.



PMSID 376 ELG Planning OBO Taylor Wimpey – submitted site boundary confirmed

as site 208.



NB: The proposed boundaries differ from Former ST12 proposed by CYC (site 872), included below for information:



Former ST13 – Land off Moor Lane, Copmanthorpe

Summary

PMSID 600 DPP OBO Shepherd Homes

Re-instate site to help meet true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 600 DPP OBO Shepherd Homes – no map supplied

NB: The proposed boundary for Former ST13 proposed by CYC (site 131), included below for information:



Former ST29 – Land at Boroughbridge Road

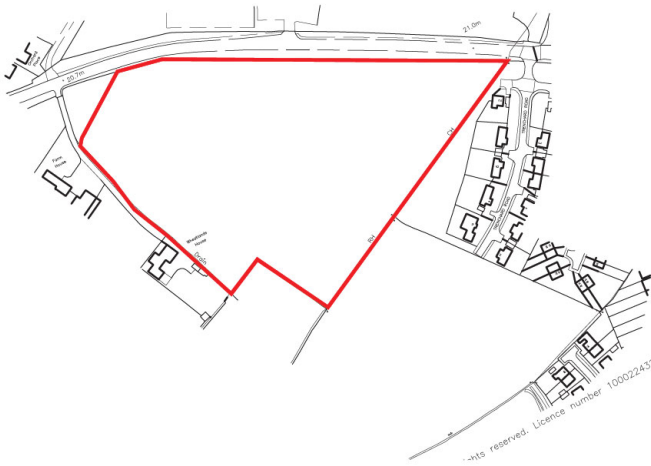
Summary

PMSID 894 Carter Jonas OBO Karbon Homes

Former ST29 - Land at Boroughbridge Road should be included as allocated housing land within the draft plan or at the very least designated as safeguarded land to meet an objectively assessed need for 100% affordable housing. The allocation is considered sustainable and provides a new, strong and defensible Green Belt boundary that will last beyond the plan period.


Site Plan showing proposed modifications, where relevant

PMSID 894 Carter Jonas OBO Karbon Homes – New proposed alternative site boundary (site 1002)



REVISIONS

The design is copyright ©




York Housing Association

Residential Development
Boroughbridge Road
York

Site Location Plan

Drawn: GJ Scale: 1:2000(A1)
Date: 16.6.19 Checked:

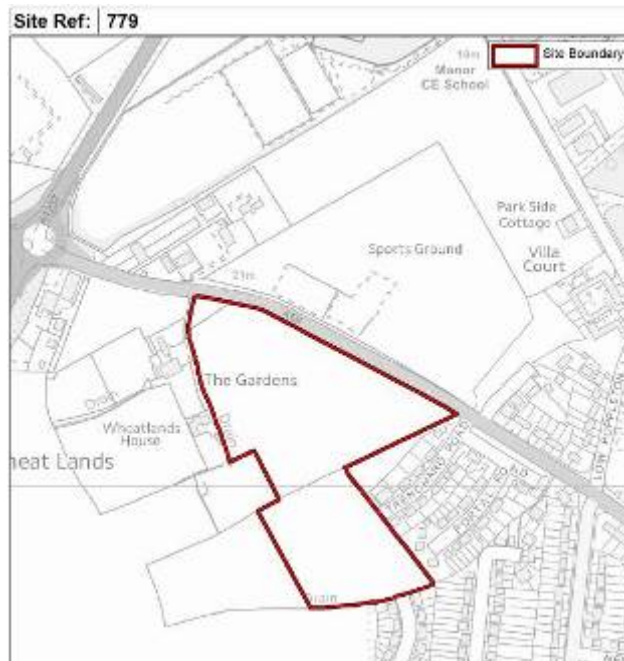
brewsterbye
5 NORTH HILL ROAD
HEADINGLEY
LEEDS
LS6 2JW



Dwg No: 539/01(02)001 #

below for information:

;YC (site 779), included



Former H2a – Racecourse Stables

Summary

PMSID 91 Strathmore estates OBO Westfield Lodge and Yaldara Ltd

The respondent wishes to have H2b (Site 132) from the Officer's Report LPWG 23.01.18 reinstated.

PMSID 122 Turnberry OBO York Racecourse

As part of green belt boundary relaxation and review of the race course estate the current horse stables could be relocated and the site to the west of Knavesmire could be used as a brownfield site for housing. This site was previously submitted during 2015 call for sites but not taken forward.

Site Plan showing proposed modifications, where relevant

PMSID 91 Strathmore estates OBO Westfield Lodge Yaldara Ltd – no map provided

PMSID 122 Turnberry OBO York Racecourse – no map provided.

NB: The proposed boundary for Former H2a proposed by CYC (site 33), included below for information:



Former H2b - Land at Cherry Lane

Summary

PMSID 91 Strathmore estates OBO Westfield Lodge and Yaldara Ltd

The respondent wishes to have H2b (Site 132) from the Officer's Report LPWG 23.01.18 reinstated.

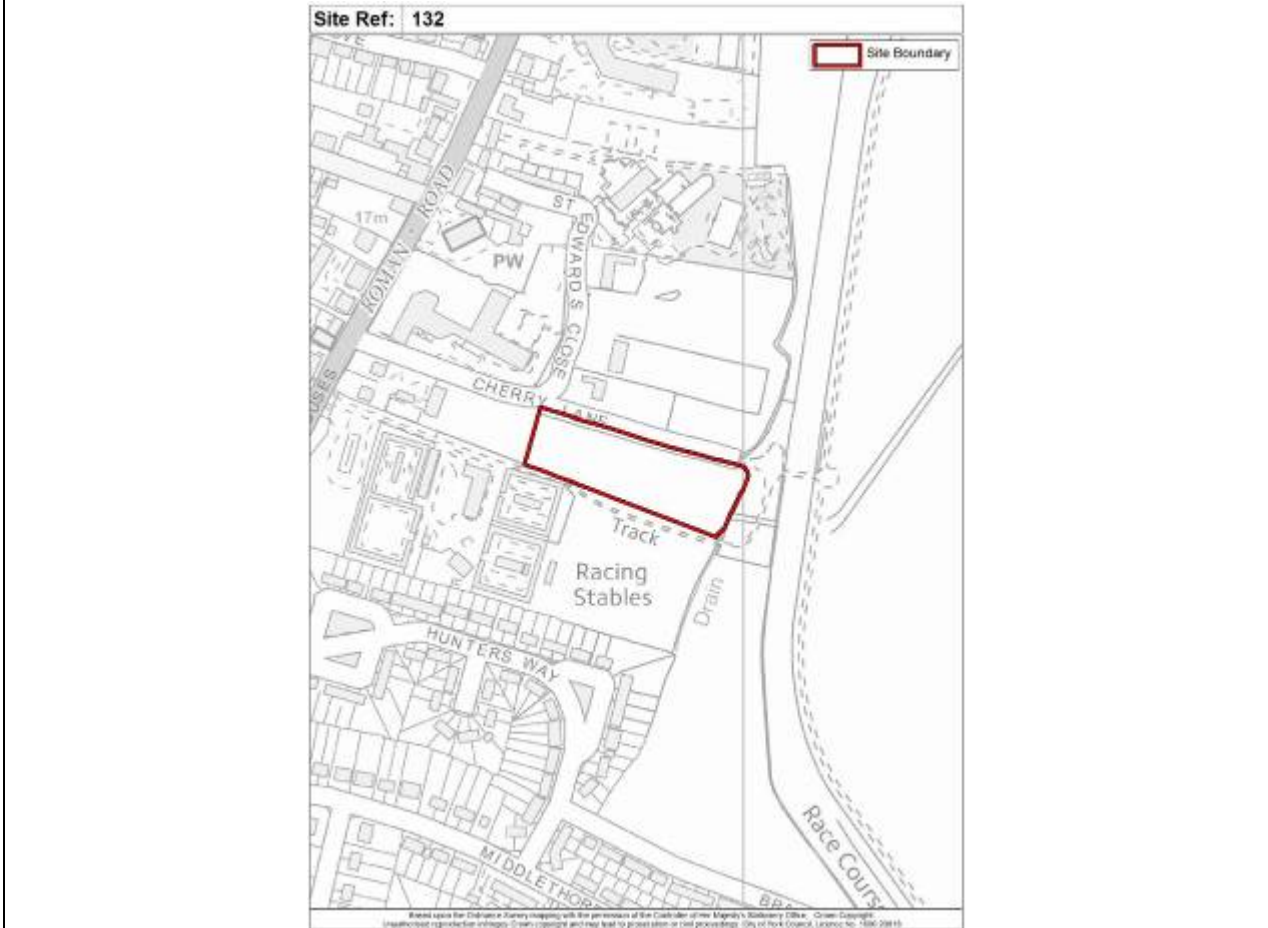
PMSID 587 O'Neill Associates OBO Shepherd Homes

Former H2b - Site 132 - The site south of Cherry Lane is in a highly sustainable location for housing and Shepherd Homes can confirm is available for development in the first 5 years of the plan period. Detailed information included in appendix. Allocation would help meet York's true housing need, guarantee permanent green belt boundaries and ensure a sound plan.

Site Plan showing proposed modifications, where relevant

PMSID 91 Strathmore estate OBO Westfield Lodge Yaldara Ltd – no map provided
PMSID 587 O'Neill Associates OBO Shepherd Homes
 – no map provided

NB: The proposed boundary for Former H2b proposed by CYC (site 132), included below for information:



Former H26 – Land at Dauby Lane, Elvington

Summary

PMSID 867 DPP OBO Yorvik Homes

Re-instate site H26 to help meet true housing need.

A number of local residents support the re-allocation of H26, which they consider to be a more sustainable and less impactful option for development than H39.

Site Plan showing proposed modifications, where relevant

PMSID 867 DPP OBO Yorvik Homes – No map provided

NB: The proposed boundary for Former H26 proposed by CYC (site 55), included below for information:



Former H27 – Land at the Brecks , Strensall

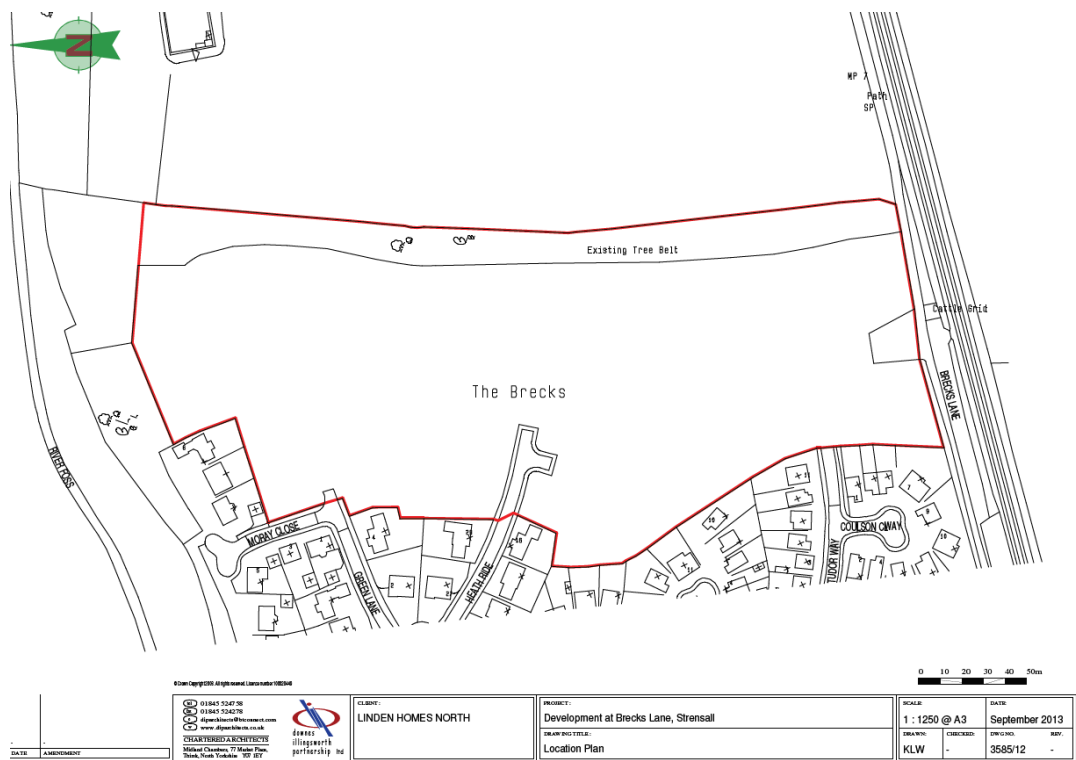
Summary

PMSID 607 Lichfields OBO Taylor Wimpey Ltd

City of York Council should review the Green Belt evidence to address the issues identified. Define the boundary of the Green Belt around Strensall such that land at Brecks Lane is excluded from The Green Belt and allocated for residential development on the Local Plan Proposals Map. The Brecks Lane site should be identified as Safeguarded Land on the Local Plan Proposals Map if it is not allocated for development. The Council should identify additional land to meet the housing needs of the community and define the Green Belt boundary accordingly. The Brecks Lane site should not be included within the identified Green Belt boundary, as it does not serve a Green Belt function, and should be allocated for residential development to help the Council meet its housing requirement. Even if the site is not allocated it should be identified as Safeguarded Land for future development.

Site Plan showing proposed modifications, where relevant

PMSID 607 Lichfields OBO Taylor Wimpey Ltd – Alternative proposed boundary (including woodland) as below:



NB: The proposed boundary for Former H27 proposed by CYC (site 49), included below for information:

Site Ref: 49



Based upon the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office. Crown Copyright.
Unauthorized reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. City of York Council Licence No. 1100 2015

Former H28 - North of North Lane, Wheldrake

Summary

PMSID 91 Strathmore estates OBO Westfield Lodge and Yaldara Ltd –

The respondent wishes to have H28 (Site 11) from the Officer's Report LPWG 23.01.18 reinstated.

PMSID 866 DPP OBO Mulgrave Properties

Re-instate site H28 to help meet true housing need.

PMSID 918 Robert Pilcher

The inclusion of sustainable sites such as H28 Wheldrake.

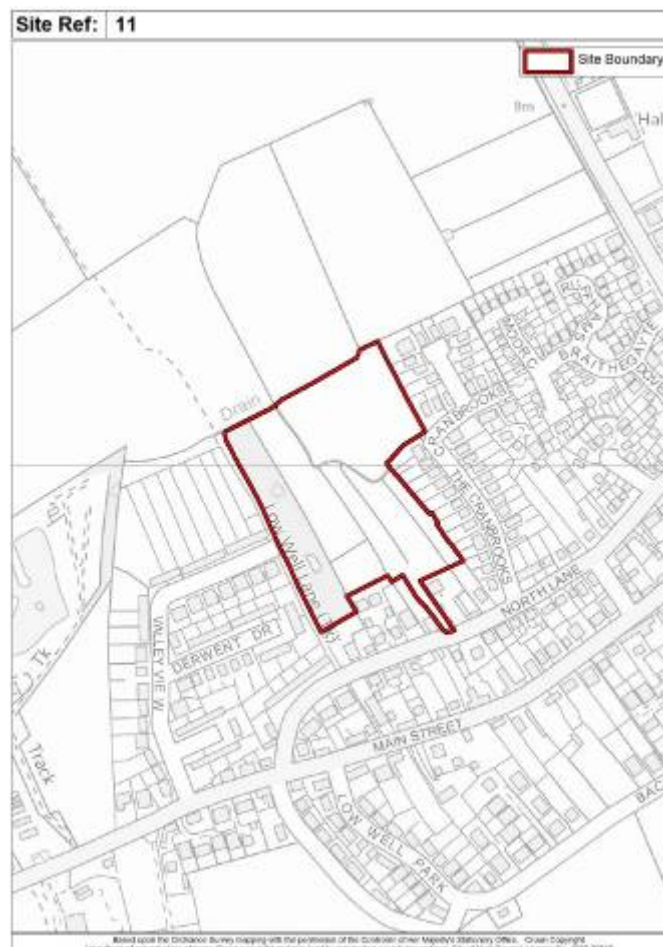
Site Plan showing proposed modifications, where relevant

PMSID 91 Strathmore estates OBO Westfield Lodge and Yaldara Ltd – no map provided

PMSID 866 DPP OBO Mulgrave Properties – no map provided

PMSID 918 Robert Pilcher – no map provided

NB: The proposed boundary for Former H28 proposed by CYC (site 11), included below for information:



Former H34 - Land to the North of Church Lane Skelton

Summary

PMSID 601 DPP OBO Private Landowner of Former H34

Landowner objects to the deletion of site which was removed from the Plan on the basis of the Council's revised evidence base and alleged lower housing requirement.

Site Plan showing proposed modifications, where relevant

PMSID 601 DPP OBO Private Landowner of Former H34 – no map submitted.

NB: The proposed boundary for Former H34 proposed by CYC (site 903), included below for information:



Former H37 – Land adjacent Greystone Court, Haxby

Summary

PMSID 91 Strathmore estates OBO Westfield Lodge and Yaldara Ltd -

Request that H37 be reinstated as an allocated housing site and removed from the Green Belt boundary. If site H37 is not reinstated, it is requested that it is allocated as "safeguarded land" for future growth in the Green Belt.

Site Plan showing proposed modifications, where relevant

PMSID 91 Strathmore estates OBO Westfield Lodge and Yaldara Ltd -

Boundary map supplied showing split between development and openspace



NB: The proposed boundary for Former H37 proposed by CYC (site 6), included below for information:

Site Ref: 6



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. 1030 28875

Former H50 – Land at Malton Road

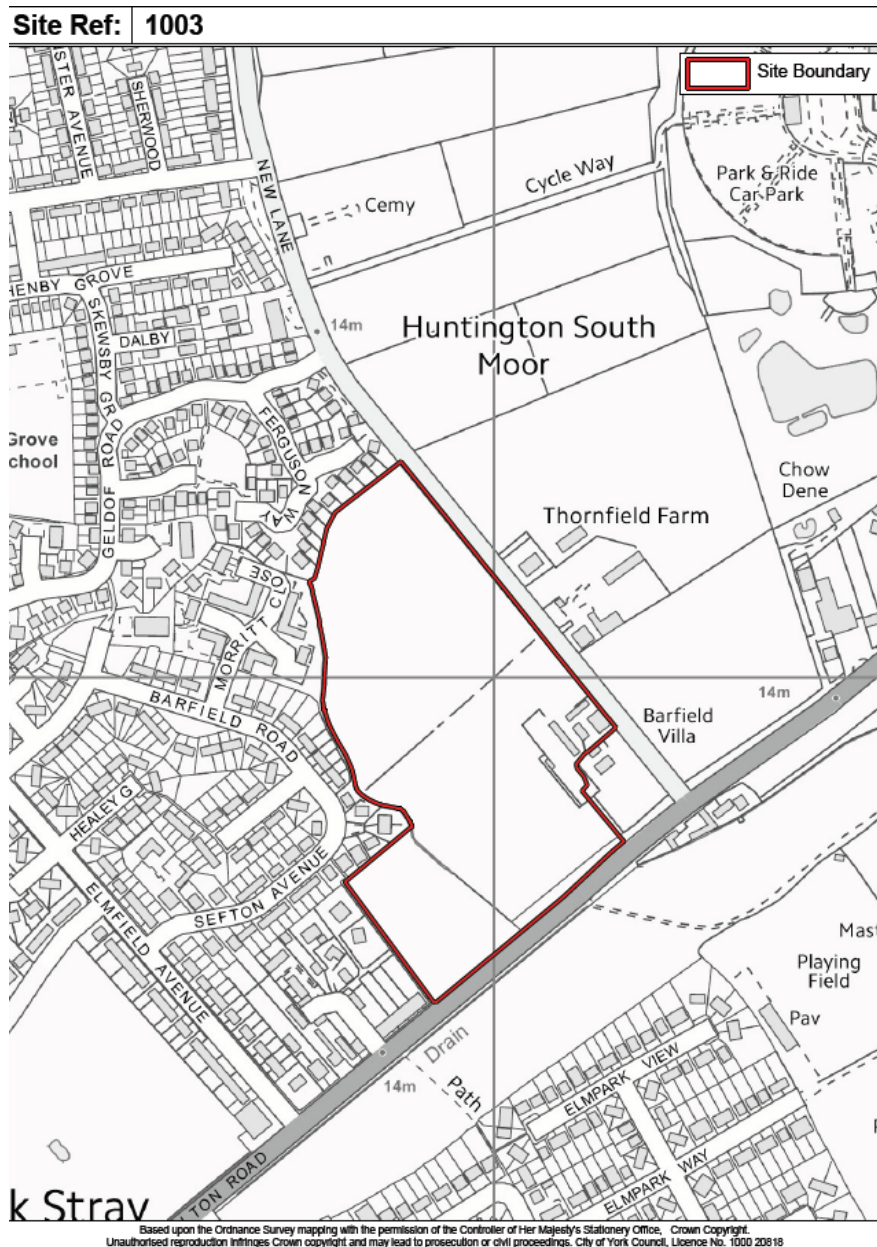
Summary

PMSID 895 Carter Jonas OBO Banks Property Ltd

Former H50 - Land at Malton Road. Include this site as an allocation as per 2014 draft plan.

Site Plan showing proposed modifications, where relevant

PMSID 895 Carter Jonas OBO Banks Property Ltd – alternative boundary for former H50 submitted (excluding private property in southeast corner) – New site 1003



Former H54 – Whiteland Field, Usher Park Road, Haxby

Summary

PMSID 125 Persimmon Homes

Suggest that the site should be removed from the green belt (See GB Mods Section) and included as an allocation for development. All relevant assessments undertaken so far have shown the site could deliver 49 dwellings by 2021/22 and contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 125 Persimmon Homes - boundary map included confirmed as site 179 as per former H54



Former SF1 - South of Strensall Village

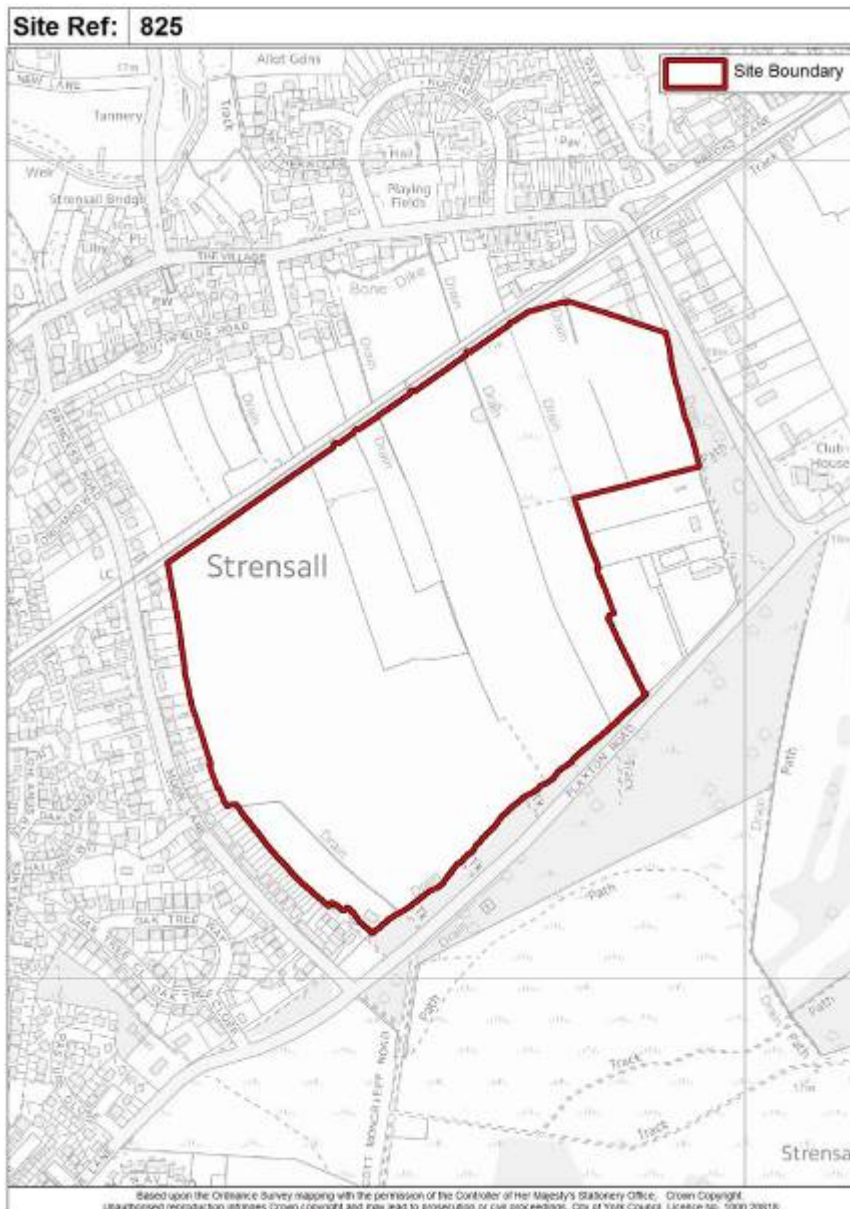
Summary

PMSID 260 Pegasus Group OBO Lovel Developments Ltd

In 2014 Preferred Options document the site was allocated as safeguarded land site reference SF1. This land is still available. Allocation for development would help meet York's true housing need and the site would provide a more sustainable location in preference to Strensall Barracks with fewer heritage constraints, better access to facilities and the community and with no existing land uses so quicker to develop.

Site Plan showing proposed modifications, where relevant

PMSID 260 Pegasus Group OBO Level Developments Ltd – site location plan submitted confirms the site boundary as site 825 as per SF1.



NB This representation also references the parcel of land to the north of the railway line to be considered in combination with this site or in its own right.

Former SF4: North of Haxby

Summary

PMSID 598 DPP OBO Linden Homes Strategic Land

Re-instate SF4 Land North of Haxby to help meet true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 598 DPP OBO Linden Homes Strategic Land – No map submitted

NB: The proposed boundary for Former SF4 proposed by CYC (site 814), included below for information:



Former SF5: West of Moor Lane, Copmanthorpe

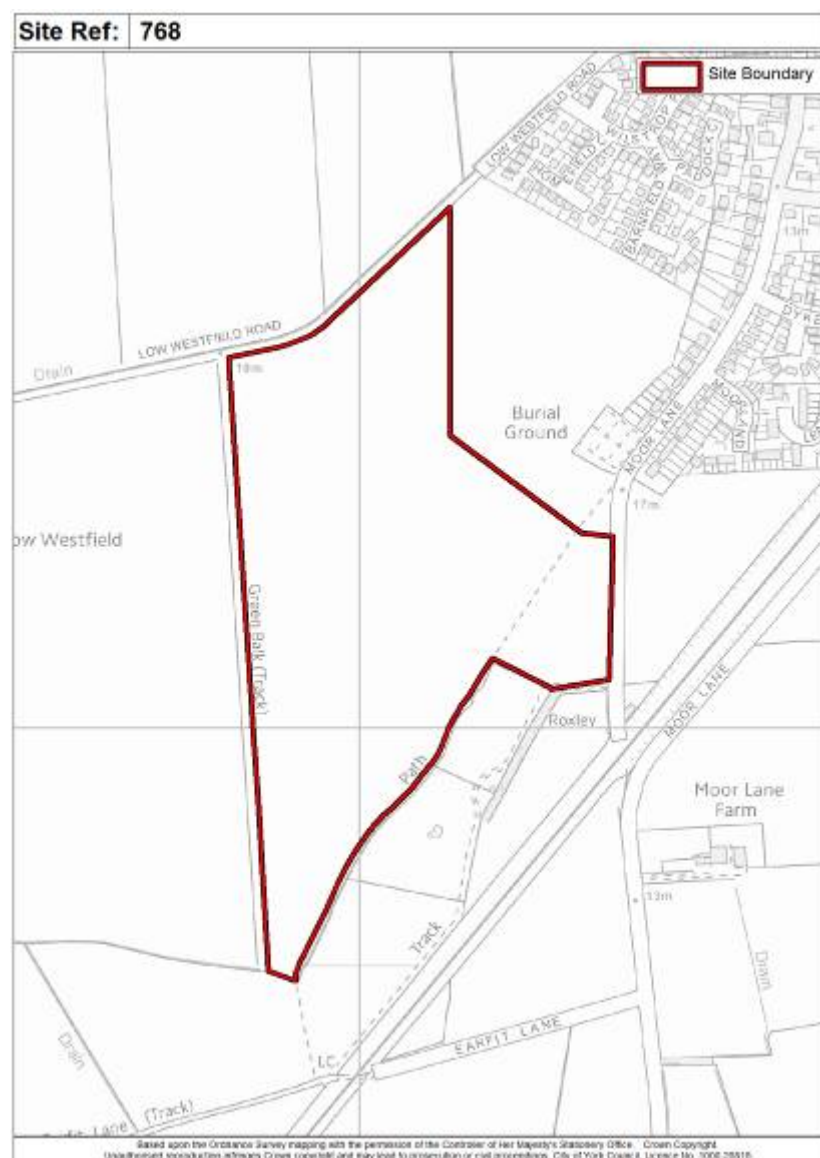
Summary

PMSID 220 O'Neill Associates OBO Private Landowner

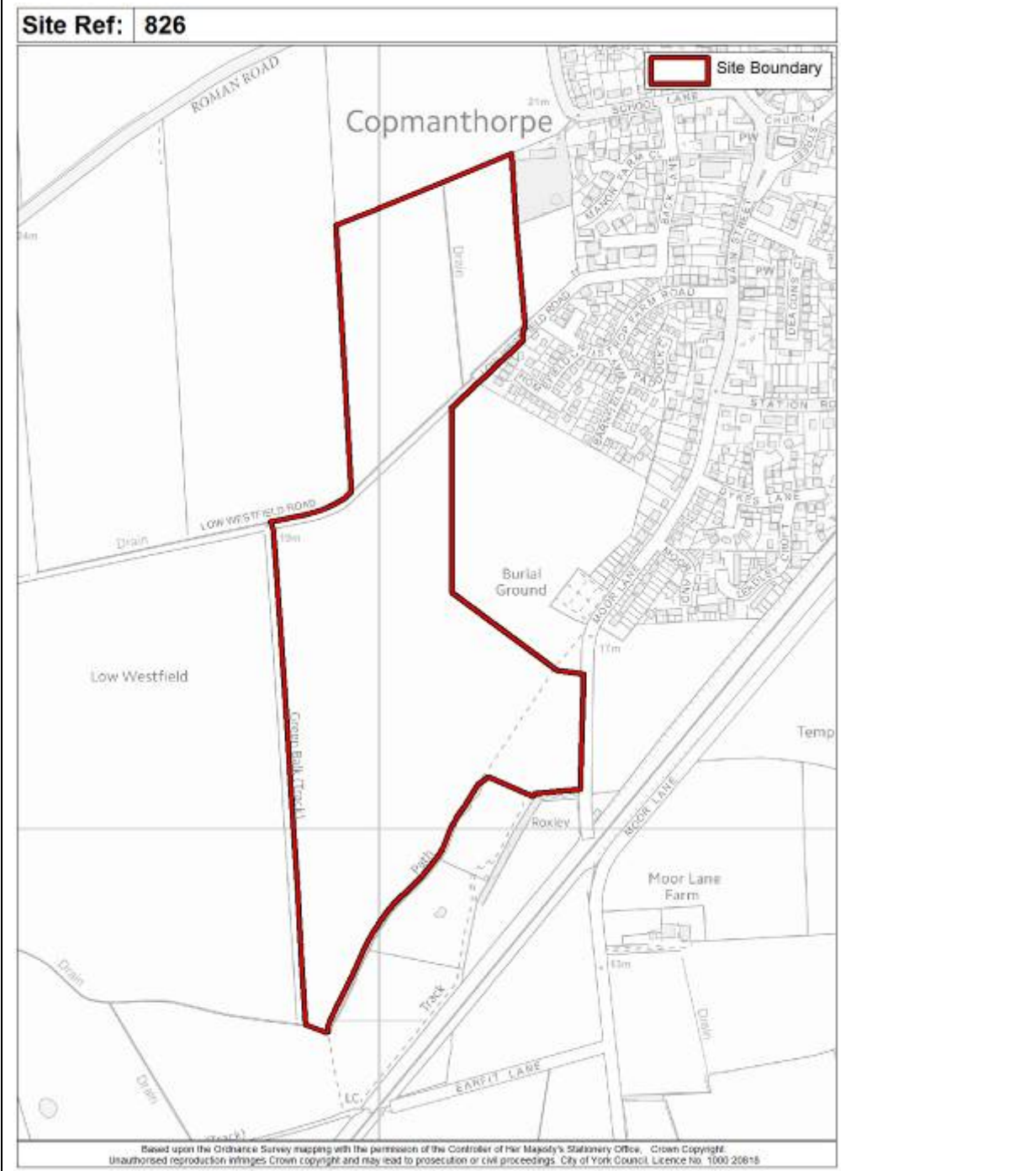
Land at Moor lane, Copmanthorpe previously identified as site SF5 - this allocation has not been retained in this version of the Plan. The site continues to represent a viable and deliverable housing site estimated at 350 units that would make a valuable contribution to York's housing need. There is a willing landowner that would help to contribute to the first 5 years of the Plan. It can be built alone or in conjunction with other pieces of land. Development of the site will not have an adverse impact in relation to the setting and special historic character of York and represents a more suitable extension of Copmanthorpe than ST15.

Site Plan showing proposed modifications, where relevant

PMSID 220 O'Neill Associates OBO Private Landowner – site location plan submitted confirms the site boundary as site 768



NB: The proposed boundary for Former SF5 proposed by CYC (site 826), included below for information:



Former SF10: Riverside Gardens, Elvington

Summary

PMSID 91 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

The respondent wishes to have SF10 (874) from the Officer's Report LPWG 23.01.18 reinstated.

Site Plan showing proposed modifications, where relevant

PMSID 91 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd – No map provided.

NB: The proposed boundary for Former SF10 proposed by CYC (site 874), included below for information:



Former SF12: Moor Lane, Woodthorpe

Summary

PMSID 581 Avison Young OBO Barwood Strategic Land II LLP

Barwood's site Land south of Moor Lane should be included in the plan as an allocation for development in order to ensure a sound plan that meets York's true housing need and produces green belt boundaries that are permanent.

PMSID 125-5 Persimmon Homes

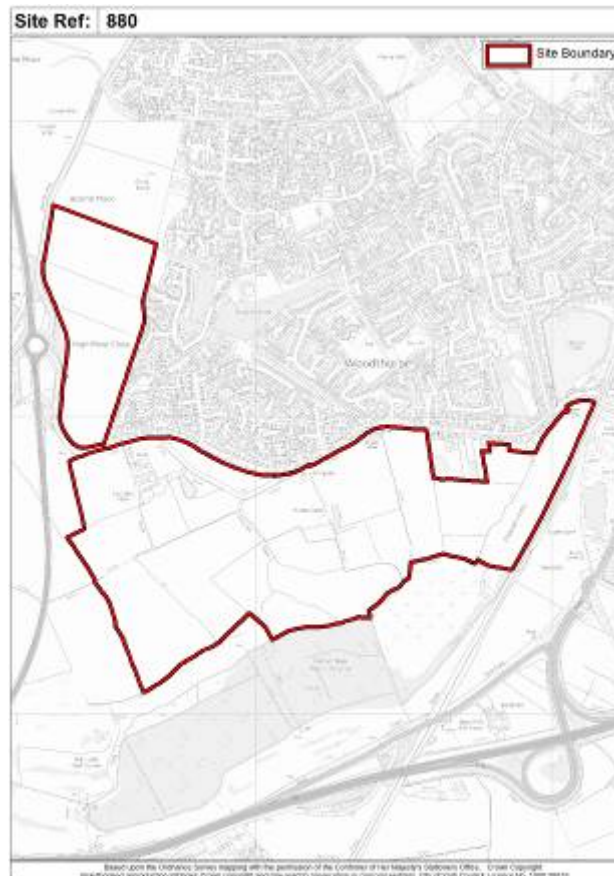
Object to the removal of alt site SF12, Moor Lane. All relevant assessments undertaken so far have shown the site could deliver 35 dwellings in 2021/22 and then delivering a further 105 in following years to result in a total of 140 dwellings on site. The site does not meet any of the five purposes of Green Belt designation, allocation for development would make a rational green belt boundary and produce a deliverable site that can contribute to meeting York's true housing need.

Remove alt site SF12, Moor Lane from the green belt and include as an allocation for development. Able to deliver 140 dwellings and contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 581 Avison Young OBO Barwood Strategic Land II LLP – No map submitted.

Previous submission plan at Reg 19 consultation (2018) (Site 880) included below for information:

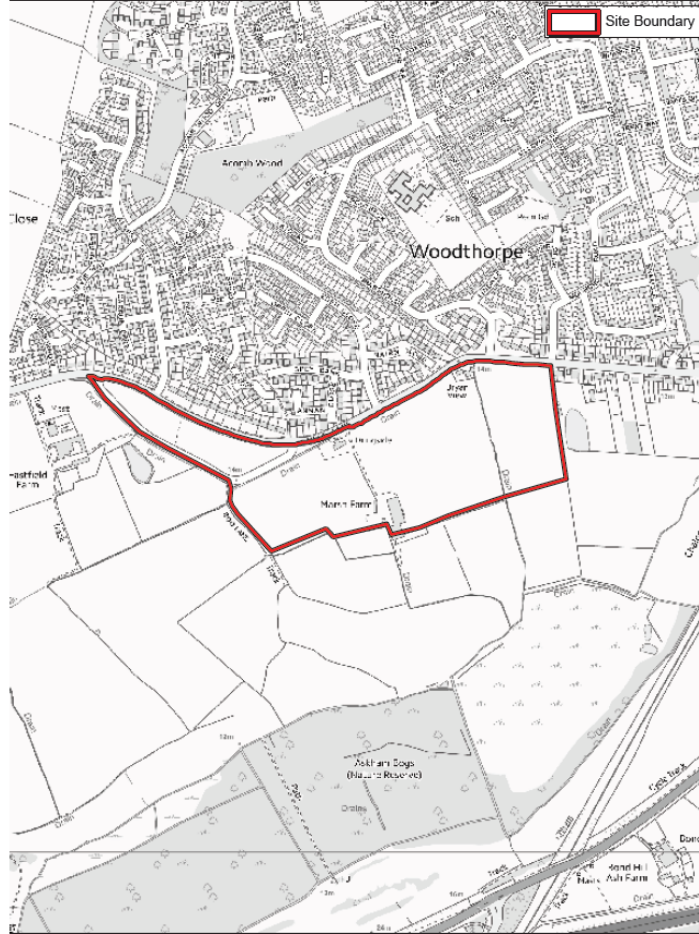


PMSID 125-5 Persimmon Homes – Submitted location map showing Persimmon interest in former SF12 confirmed as:



NB: The proposed boundary for Former SF12 proposed by CYC, included below for information:

Site Ref: SF12 (Derived from Site 148)



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, License No. 1000 20818

Former SF15 - Land North of Escrick

Summary

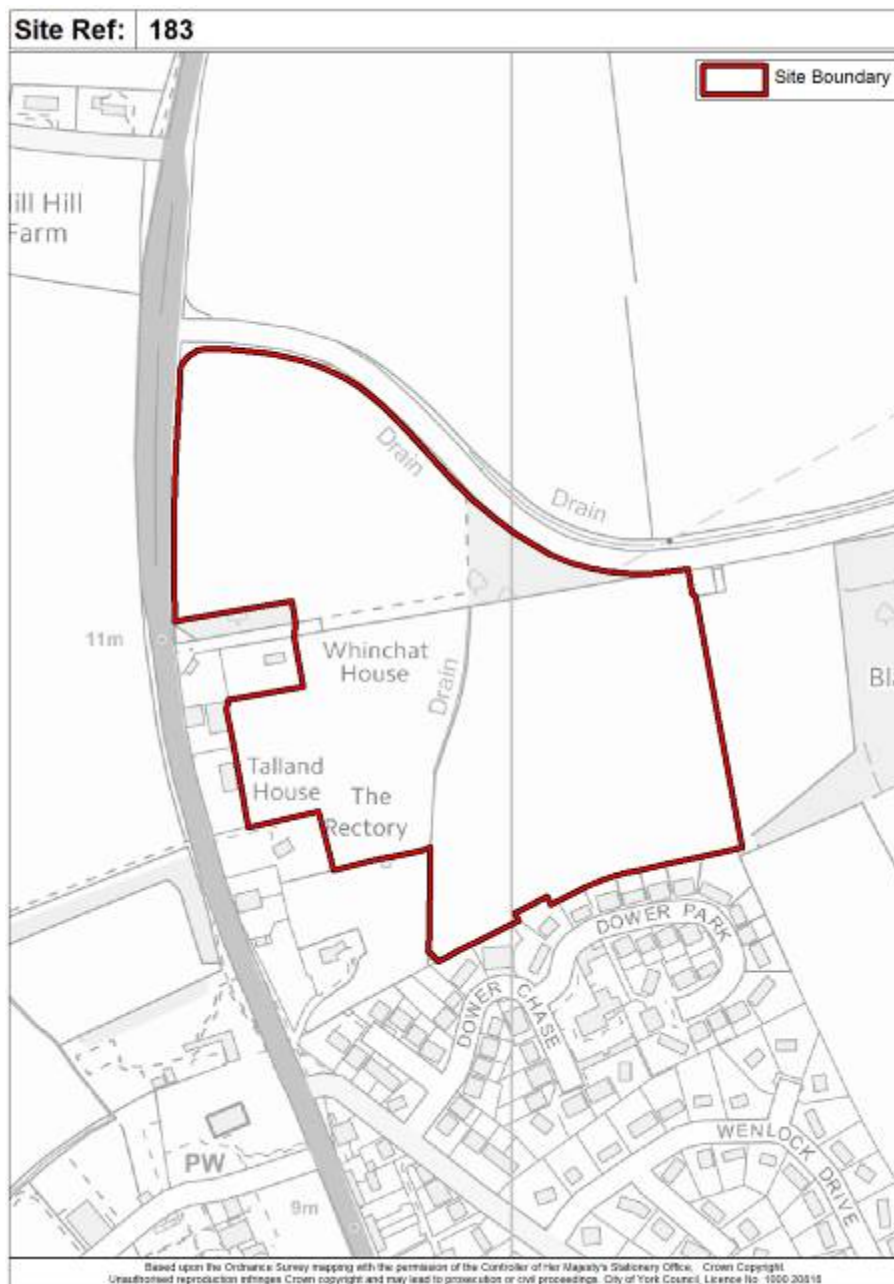
PMSID 598 DPP OBO Linden Homes Strategic Land

Re-instate site SF15 Land North of Escrick to help meet true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 598 DPP OBO Linden Homes Strategic Land – no map submitted.

NB: The proposed boundary for Former SF15 proposed by CYC (site 183), included below for information:



Site 4 – Land at North Lane, Huntington

Summary

PMSID 357 ID Planning OBO Green Developments

Land to the East of Cotswold Way and North of North Lane Huntington should be allocated to meet the needs of older people. The site is available, suitable and achievable. Additional sites should be identified to meet the need for older person housing.

Site Plan showing proposed modifications, where relevant

PMSID 357 ID Planning OBO Green Developments – Site plan submitted confirmed boundary of site 4.



Site 76 - Duncombe Farm, Strensall

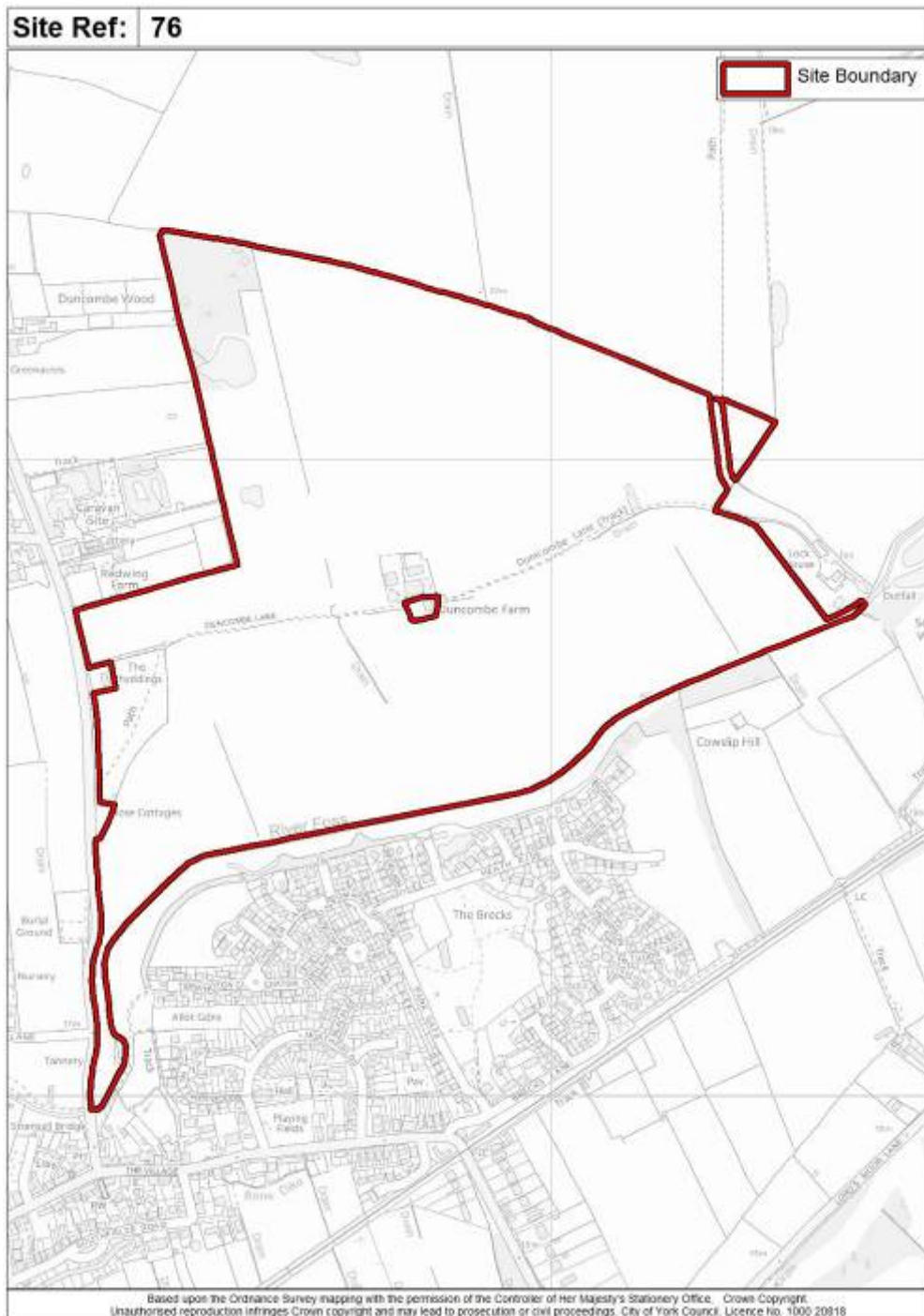
Summary

PMSID 870 Private Landowner

Respondent wishes to have Duncombe Farm, Strensall, to be included in the Local Development Plan.

Site Plan showing proposed modifications, where relevant

PMSID 870 Private Landowner – submitted site plan confirms boundary of site 76



Site 141 – Northfields Playing Pitches

Summary

PMSID 901 O'Neill Associates OBO York St John University

The Green Belt boundaries at Northfields should be reconsidered, with a view to omitting the site from the Green Belt to ensure consistency with Local Plan objectives to support the use and development of the Sports Park for YSJ University.

Site Plan showing proposed modifications, where relevant

PMSID 901 O'Neill Associates OBO York St John University – Submitted site plan confirms boundary as site 141.



Site 165 – Westfield Lane, Wigginton

Summary

PMSID 125-7 Persimmon Homes

Object to the removal of alt site reference 165, Land off Westfield Lane, Wigginton. Site could deliver 230 dwellings (35 dwellings in 2021/22 and 195 in following years). The site does not meet any of the five purposes of Green Belt and allocation would make a rational green belt boundary and produce a deliverable site to contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 125-7 Persimmon Homes – Submitted site plan confirms boundary as site 165.



Site 170 – Pond Field, Heslington

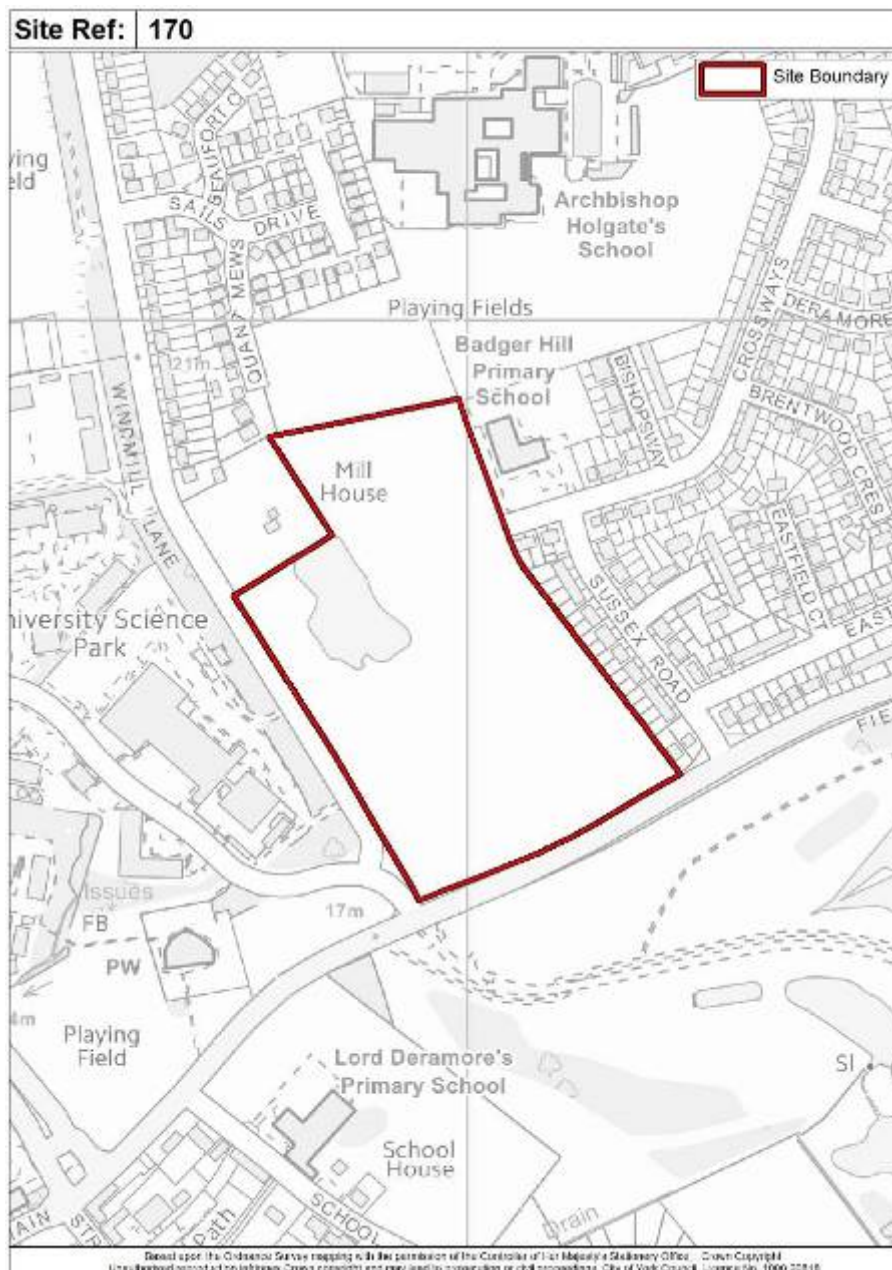
Summary

PMSID 125-4 Persimmon Homes

Object to the removal of alt site reference 170, Land off Windmill Lane, York (Pond Field). Able to deliver 140 dwellings (35 dwellings in 2021/22 and then delivering a further 105 in following years). The site does not meet any of the five purposes of Green Belt and allocation would make a rational green belt boundary and produce a deliverable site to contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 125-4 Persimmon Homes – Submission confirms boundary of site 170.



Site 171 - Lime Tree Farm Heslington

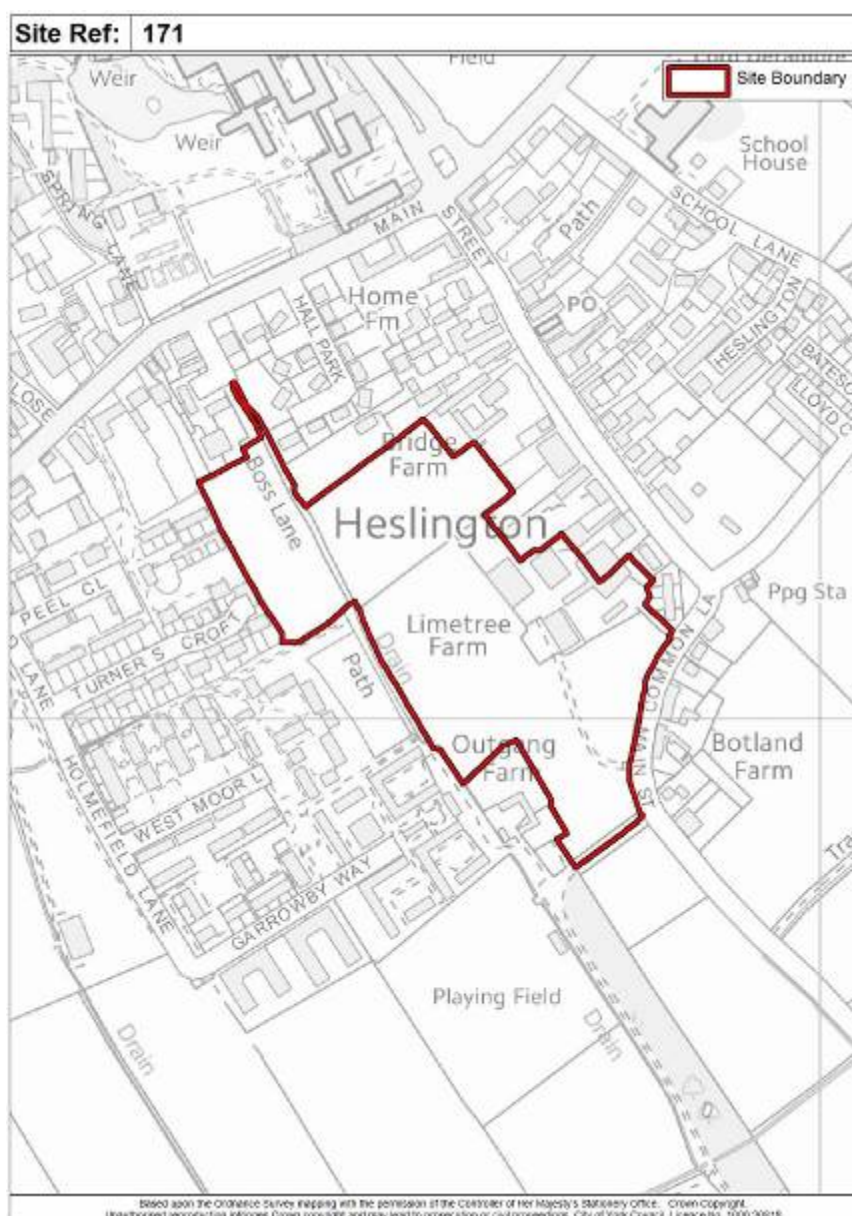
Summary

PMSID 125 Persimmon Homes

Object to the removal of alt site reference 171, Common Lane, Lime Tree Farm. Able to deliver 150 dwellings (35 dwellings in 2021/22 and then delivering a further 115 in following years). The site does not meet any of the five purposes of Green Belt and allocation would make a rational green belt boundary and produce a deliverable site to contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 125 Persimmon Homes – Site submission confirmed boundary of site 171



Site 191 – Land at Avon Drive (Alternative boundary 968)

Summary

PMSID 826 – Thomas Pilcher Homes and PMSID 827 Pilcher Homes

Site 191 should be excluded from the Green Belt and included as a site allocation for housing.

PMSID 917 & 918 Private Landowners –

Site 191 should be excluded from the Green Belt and included as a site allocation for housing.

Site Plan showing proposed modifications, where relevant

PMSID 826 – Thomas Pilcher Homes / PMSID 827 Pilcher Homes / PMSID 917 Private Landowner / 918 Private Landowner – Submissions confirm boundary as site 191.



Site 221 – Agricultural Land, Sim Balk lane

Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

To meet the OAN in the early years of the Plan the original sites we put forward (221-224 Between Sim Balk Lane & Bishopthorpe) should be included. We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated.

Site Plan showing proposed modifications, where relevant

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited – Submission confirmed boundary of site 221



Site 222 – Agricultural Land, Sim Balk lane

Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

To meet the OAN in the early years of the Plan the original sites we put forward (221-224 Between Sim Balk Lane & Bishopthorpe) should be included. We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated.

Site Plan showing proposed modifications, where relevant

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited – Submission confirmed boundary of site 222



Site 223 – Agricultural Land, Copmanthorpe Lane, Bishopthorpe

Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

To meet the OAN in the early years of the Plan the original sites we put forward (221-224 Between Sim Balk Lane & Bishopthorpe) should be included. We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated

Site Plan showing proposed modifications, where relevant

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited – Submission confirmed boundary of site 223



Site 224 – Agricultural Land, Church Lane, Bishopthorpe

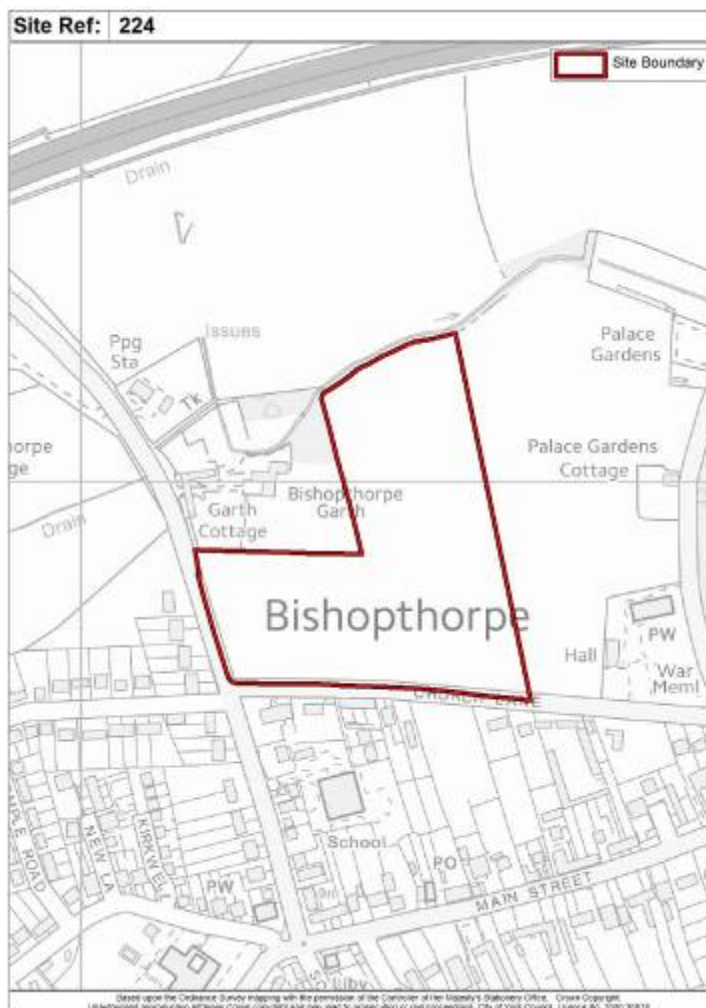
Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

To meet the OAN in the early years of the Plan the original sites we put forward (221-224 Between Sim Balk Lane & Bishopthorpe) should be included. We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated

Site Plan showing proposed modifications, where relevant

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited –
Submission confirmed boundary of site 224



Site 322 – Amalgamated Sites South of Strensall

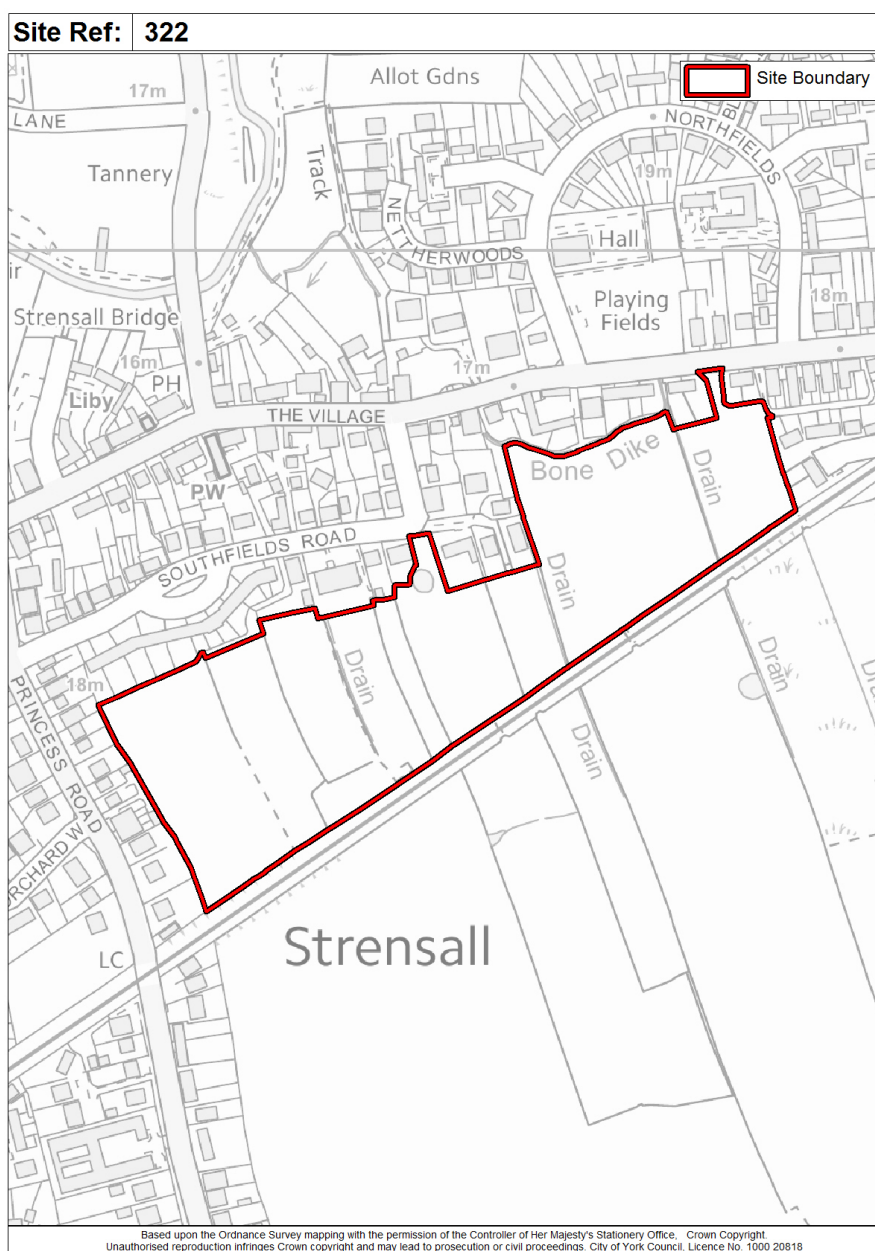
Summary

PMSID 0260 Pegasus Group OBO Level Developments Ltd

The northern parcel represents an area of land which is well connected to the existing settlement and has clearly defined boundaries by virtue of existing residential development and the railway line to the south. The site can therefore be released from the Green Belt without causing harm to the openness of the Green Belt and resulting in unrestricted urban sprawl. Allocation for development would help meet York's true housing need. The site is proposed either in conjunction with SF1 or in isolation.

Site Plan showing proposed modifications, where relevant

PMSID 0260 Pegasus Group OBO Level Developments Ltd – Submitted
boundary confirmed as Site 322



Site 737 – Stock Hill Field, West of Church Balk, Dunnington

Summary

PMSID 890 Johnson Mowatt OBO Yorvik Homes

Yorvik Homes maintain their interest in land at Stock Hill Field, west of Church Balk, on the northern edge of Dunnington, and are keen to deliver the site. Upon approval the site could be brought forward for development immediately therefore delivering dwellings in the early part of the plan period. Site specific comments submitted to the Publication Draft Local Plan in March 2018 remain relevant.

Site Plan showing proposed modifications, where relevant

PMSID 890 Johnson Mowatt OBO Yorvik Homes – Site plan submission confirmed boundary of site 737



Site 787 – Land to the South of Stockton Lane

Summary

PMSID 125-6 Persimmon Homes

Object to the removal of alt site 787, Stockton Lane (formerly part of ST7). Site could it deliver 100 homes in first 5 years of plan and is able to deliver 100 dwellings and contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 125-6 Persimmon Homes - Submission confirmed boundary of site 787



Site 629 and 862 – Land at the Retreat, Heslington

Summary

PMSID 603 Savills (UK) Ltd OBO Retreat Living Ltd

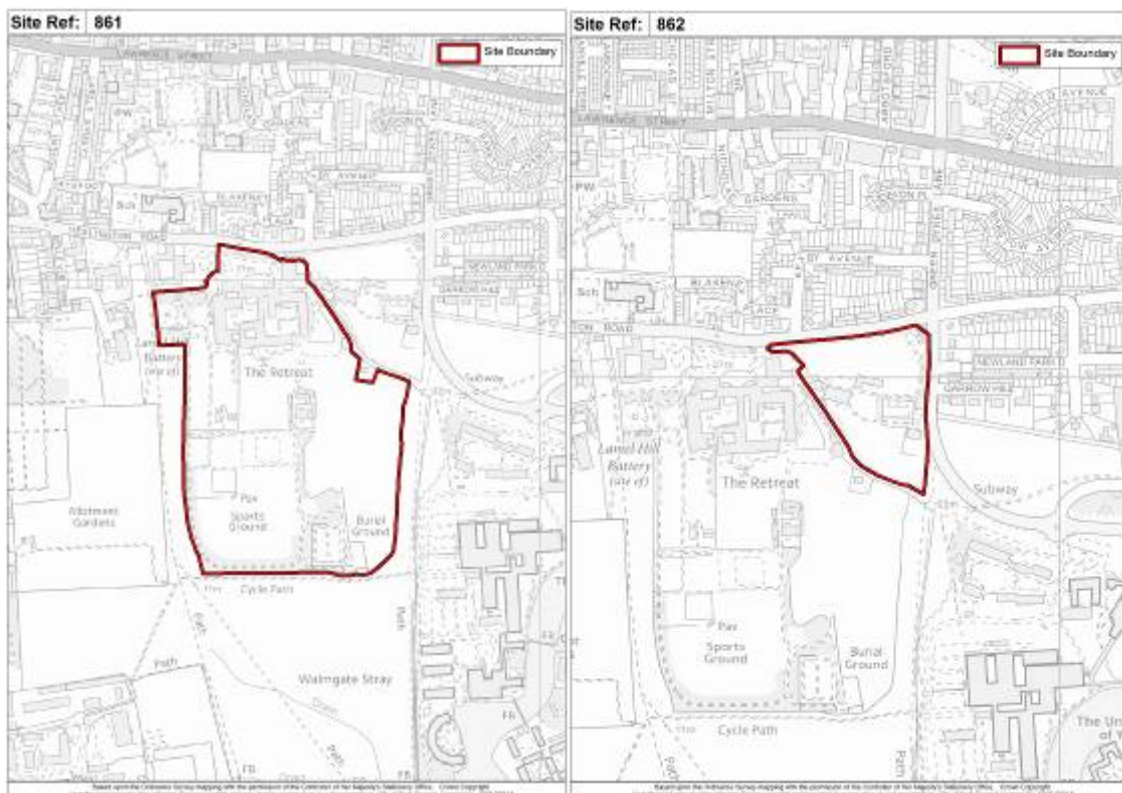
These representations do not seek to allocate the Site of the retreat (Site 629) for development as such, as there is agreement with the SHLAA 2017 commentary that the Site should not be included as an allocation in the emerging Local Plan, due to the significant constraints of the site (impact on heritage assets and landscape), concluding that any future development of the site should instead be assessed through the Development Management/Planning Application process and not as an allocation, more so to demonstrate why the Site should not be included within the Green Belt moving forward .

PMSID 916 Carter Jonas OBO Schoen Clinic York Ltd/ The Retreat Living

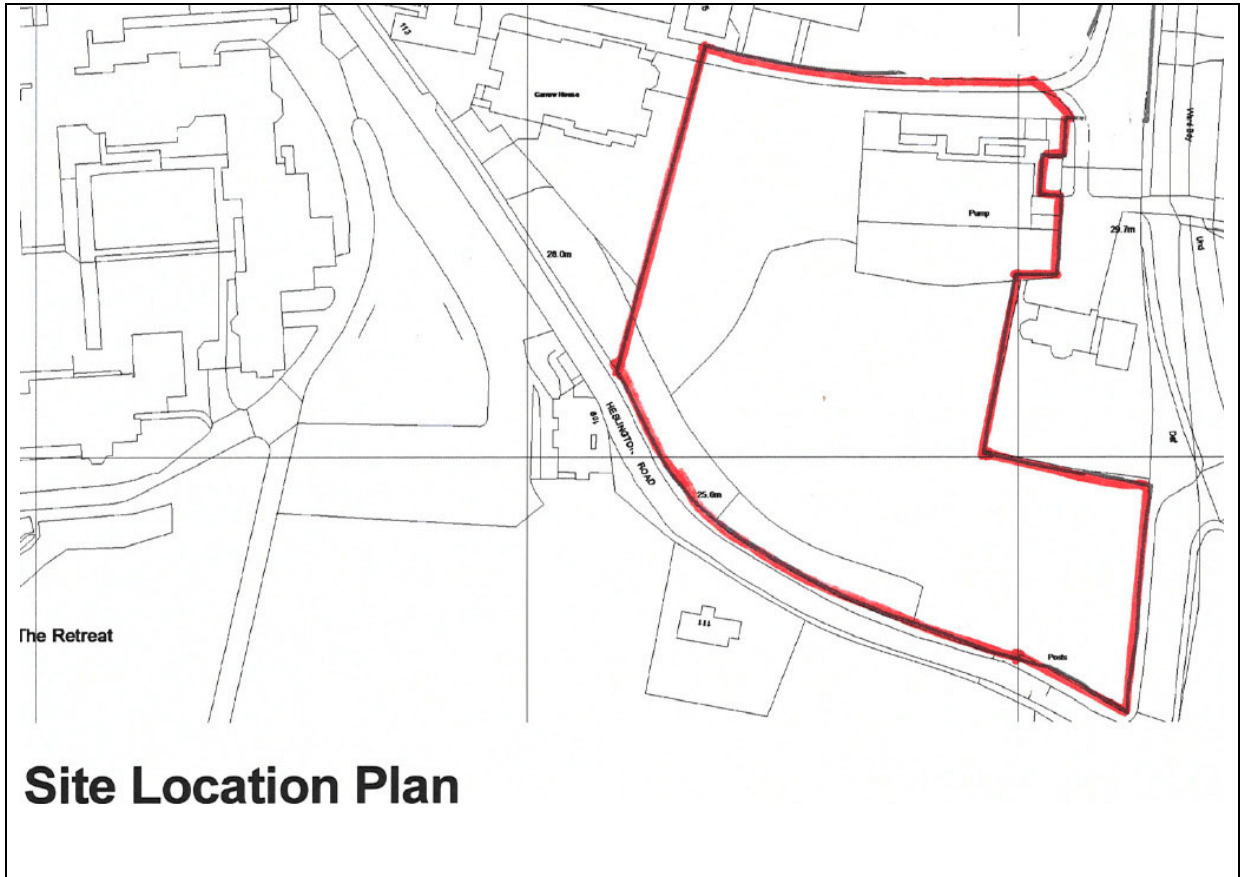
The Retreat Heslington Road - Include plot 2a (a part of site 862) as an allocation for development in order to meet York's true housing need and provide a permanent green belt boundary in this area of the city.

Site Plan showing proposed modifications, where relevant

PMSID 603 Savills (UK) Ltd OBO Retreat Living Ltd – Submitted site plan confirms boundary for removal and development as site 861 and site 862



PMSID 916 Carter Jonas OBO Schoen Clinic York Ltd/ The Retreat Living – Submitted site plan confirms that plot 2a seeking removal from the Green Belt for housing development is part of site 862 (above). Submitted location map as follows:



Site Location Plan

Site 871– Land at North Field, York

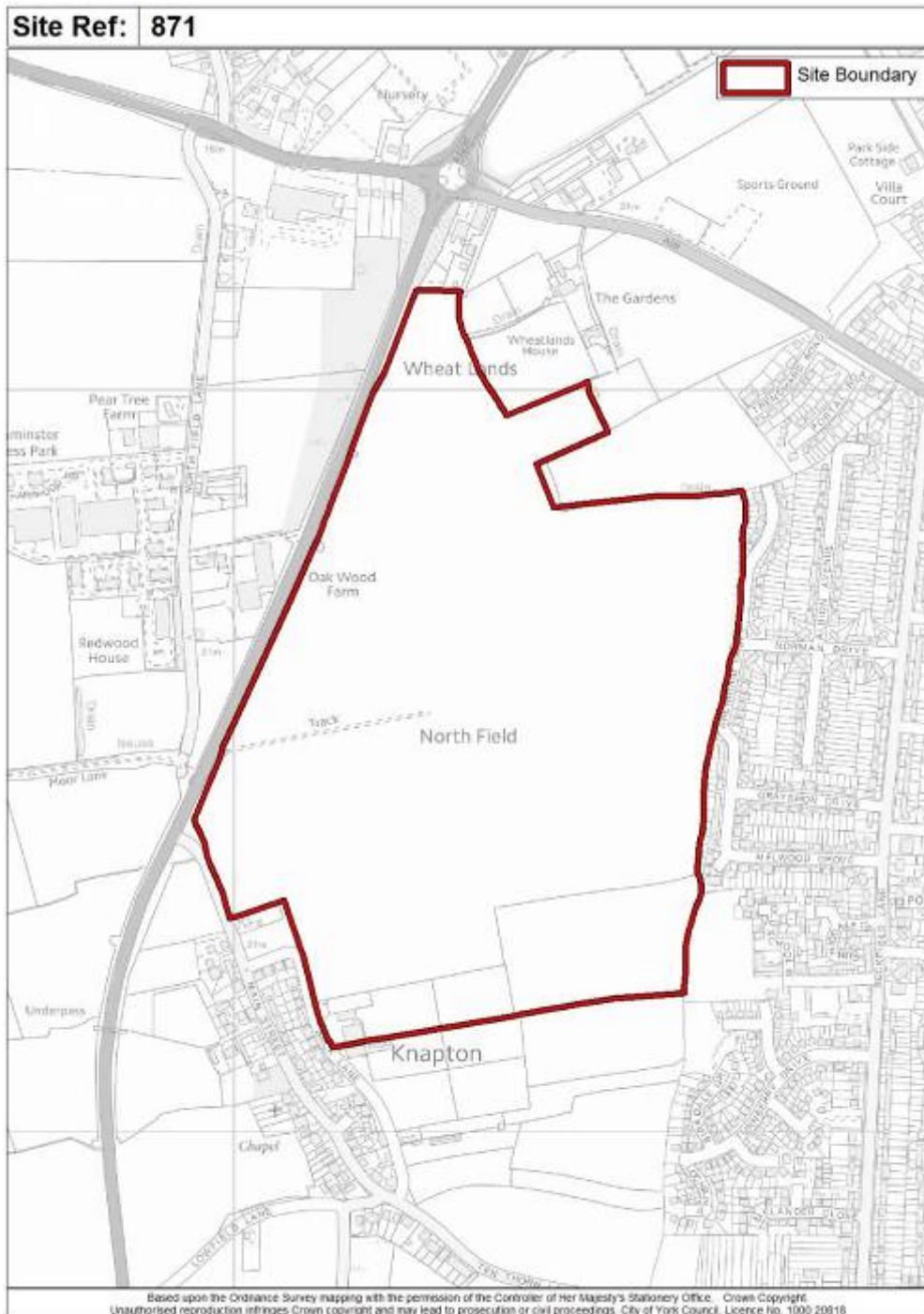
Summary

PMSID 604 Carter Jonas OBO L & Q Estates (Formerly Gallagher Estates)

Re-instate SHLAA 2018 site reference 871 for development to help meet the true housing need. At the very least include the site as safeguarded land.

Site Plan showing proposed modifications, where relevant

PMSID 604 Carter Jonas OBO L & Q Estates (Formerly Gallagher Estates) – Submitted site plan confirms boundary as site 871



Site 873 – Land to the East of the Designer Outlet

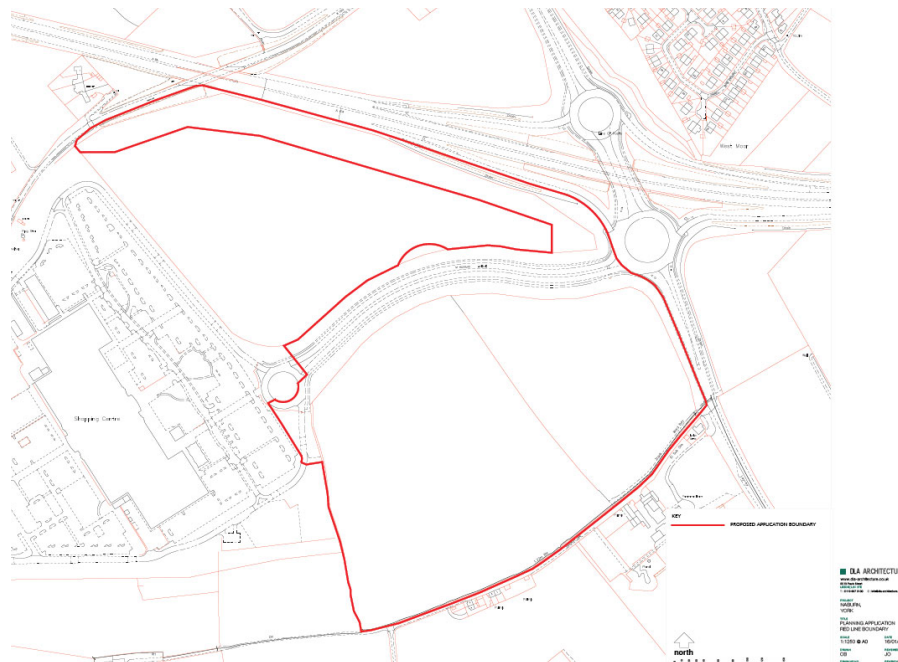
Summary

PMSID 141 Avison Young OBO Oakgate

Naburn Business Park includes 25,000sqm of office floorspace that could help plug the office floorspace gap we have identified in the draft Local Plan. An application has been submitted to CYC, which is supported by an EIA and a suite of technical documents which demonstrates how the proposals represent sustainable development. Can be delivered immediately to meet York's unmet employment needs.

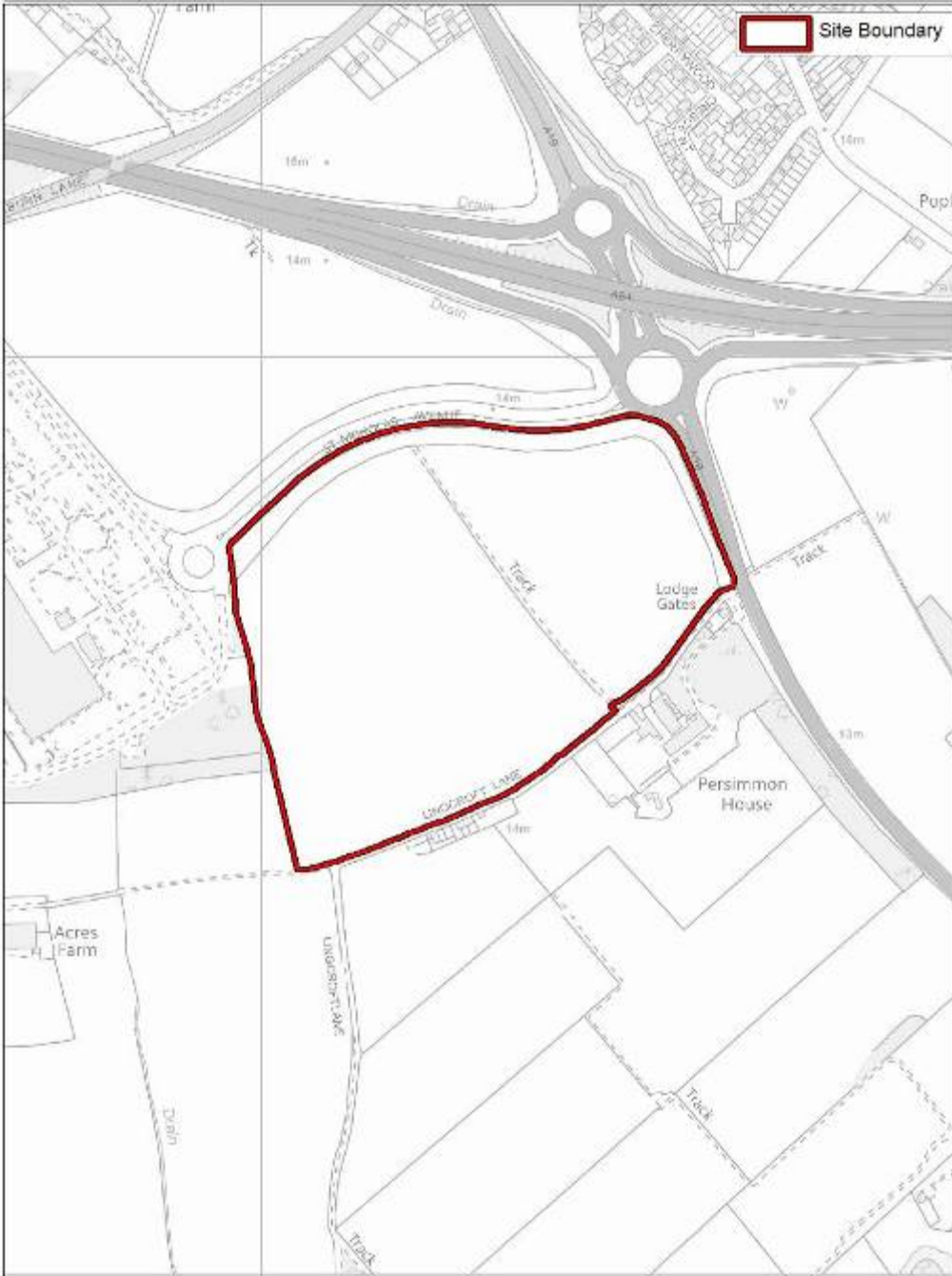
Site Plan showing proposed modifications, where relevant

PMSID 141 Avison Young OBO Oakgate – Submitted site plan confirmed as follows:



NB: The proposed boundary for recorded by CYC is site 873, included below for information:

Site Ref: 873



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 200 18

Site 882 – Askham Lane Acomb

Summary

PMSID 598 DPP OBO Linden Homes Strategic Land

Re-instate to help meet true housing need. If not for development than at least allocation as safe guarded land.

Site Plan showing proposed modifications, where relevant

PMSID 598 DPP OBO Linden Homes Strategic Land – No map submitted but representation confirms site boundary 882.



Site 891/922/964– Galtres Garden Village

Summary

PMSID 376 -1 ELG Planning OBO Taylor Wimpey

Respondent seeks release of land at Galtres Farm which was previously identified by Council (sites 891 & 922) but not carried forward to publication of draft plan. The land is in a suitable, sustainable location with viable development and available now for short term delivery.

PMSID 620 O'Neill Associates OBO Galtres Garden Village Development Group

The Galtres Village scheme will help address York's true housing need. It proposes a new settlement of 1,753 units of which 1,403 will be market and affordable dwellings, 286 retirement dwellings in a mixture of houses, bungalows and extra care apartments and a 64-bed care home. At least 40% of the dwellings will be affordable units. The development area comprises 77.37 hectares with an additional 15.6 hectares available for a country park.

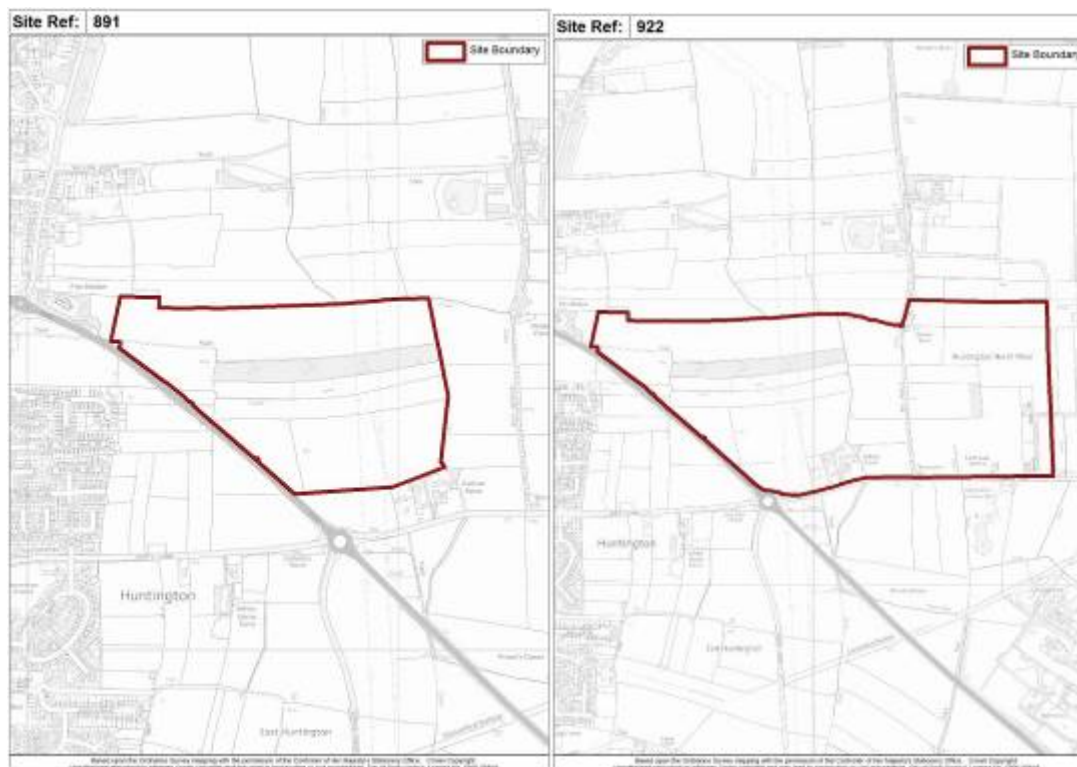
Attached is a survey showing support for Galtres Garden Village (alt site 891) development, 65% of respondents gave the scheme a 7/10 or higher.

PMSID 91 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

The respondent wishes to have site 964 from the Officer's Report LPWG 23.01.18 reinstated for development.

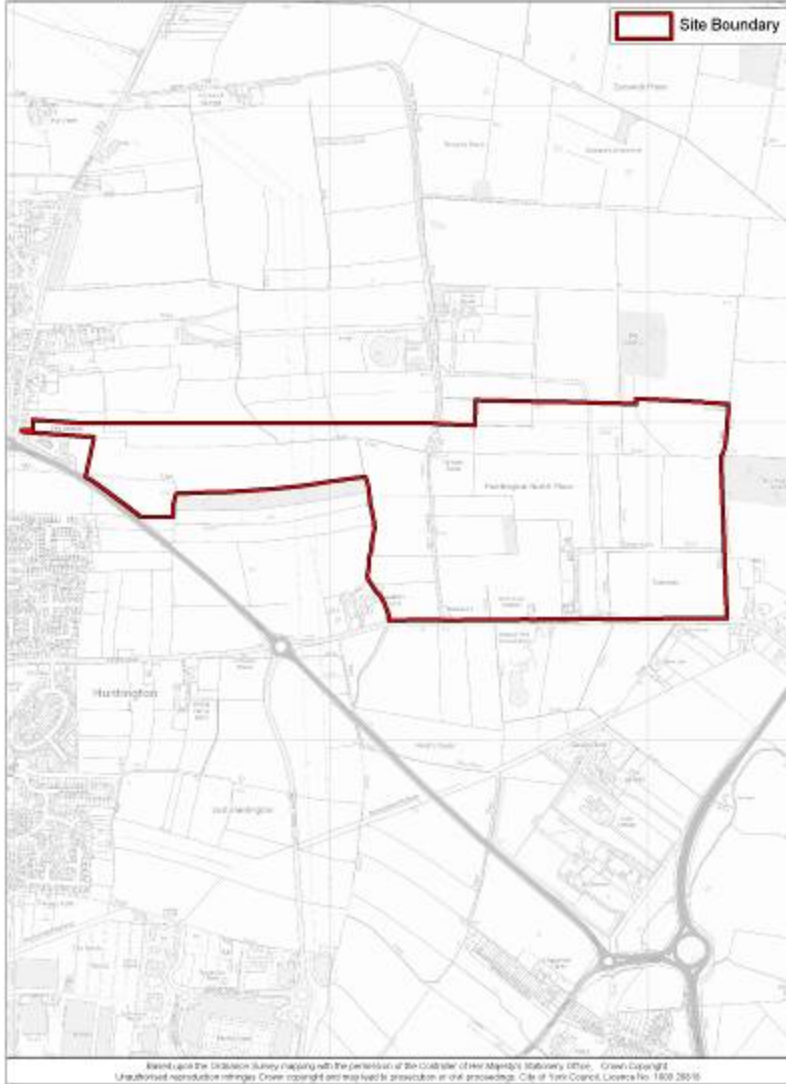
Site Plan showing proposed modifications, where relevant

PMSID 376 -1 ELG Planning OBO Taylor Wimpey – submission confirms reference to sites 891 and 922.



PMSID 620 O'Neill Associates OBO Galtres Garden Village Development Group
– Submission site plan confirms boundary for site 964.

Site Ref: 964



PMSID 91 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd – No map provided.

Site 897 – Land Adjacent to Landing Lane Haxby

Summary

PMSID 214 O'Neill Associates OBO Private Landowners

Include alt site 97 Land west of Landing Lane, Haxby as an allocation for development in order to meet York's true housing need, provide a permanent green belt boundary and ensure a sound plan. The land could be used for housing, as a care home or to provide car parking for the planned Haxby Rail Station. Site is ready to deliver within the first five years of the plan. Detailed information attached as appendix.

Site Plan showing proposed modifications, where relevant

PMSID 214 O'Neill Associates OBO Private Landowners – No submitted site plan. However, reference to previous representations confirm that this is in relation to site boundary 897.



Site 942 – Land west of Chapelfields

Summary

PMSID 182 Johnson Mowatt OBO KCS Development

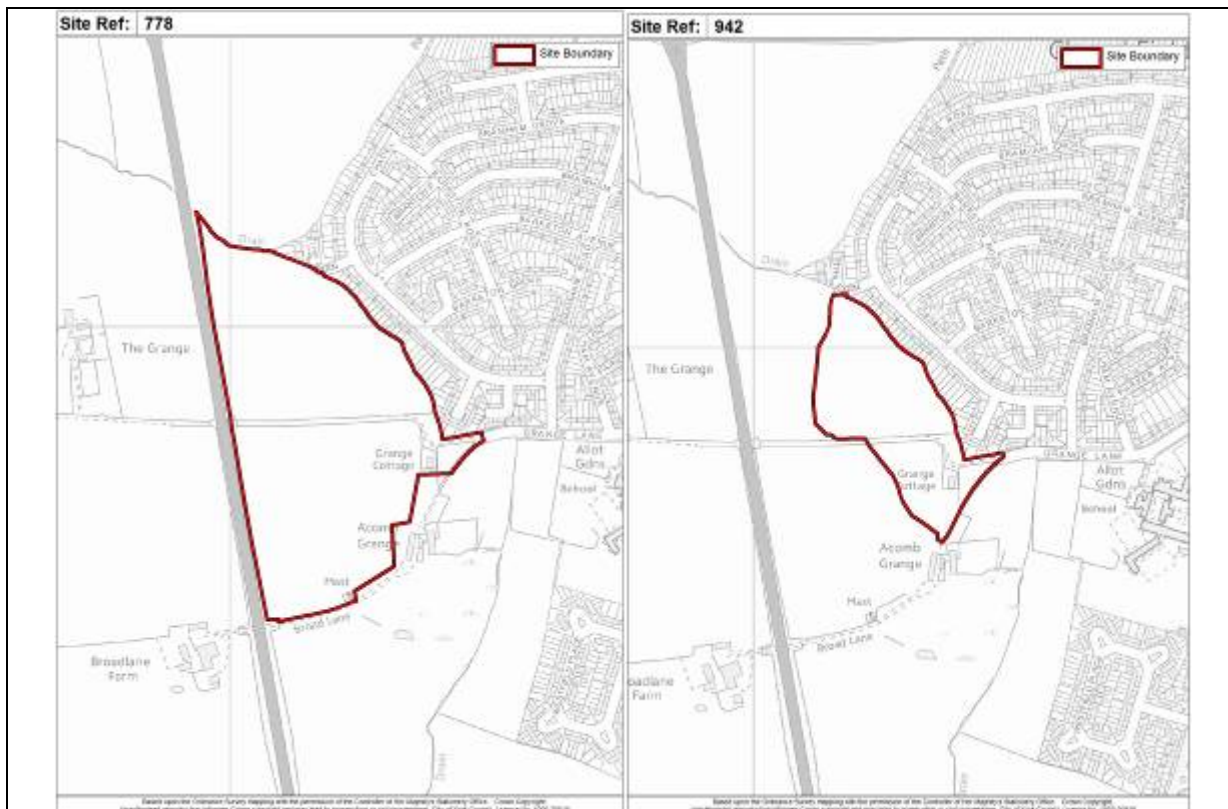
Include alt site 942 Land to the West of Chapelfields, Knapton in the plan as an allocation for housing in order to meet York's true housing need. This will ensure a five year land supply and that Green Belt boundaries retain permanence.

Site Plan showing proposed modifications, where relevant

PMSID 182 Johnson Mowatt OBO KCS Development – Submitted site plan confirms development area and wider site boundary as follows:



NB: The Development area is recorded by the Council as site 942 and the wider boundary is site 778, included below for information:



Site 952– Land North of Northminster Business Park

Summary

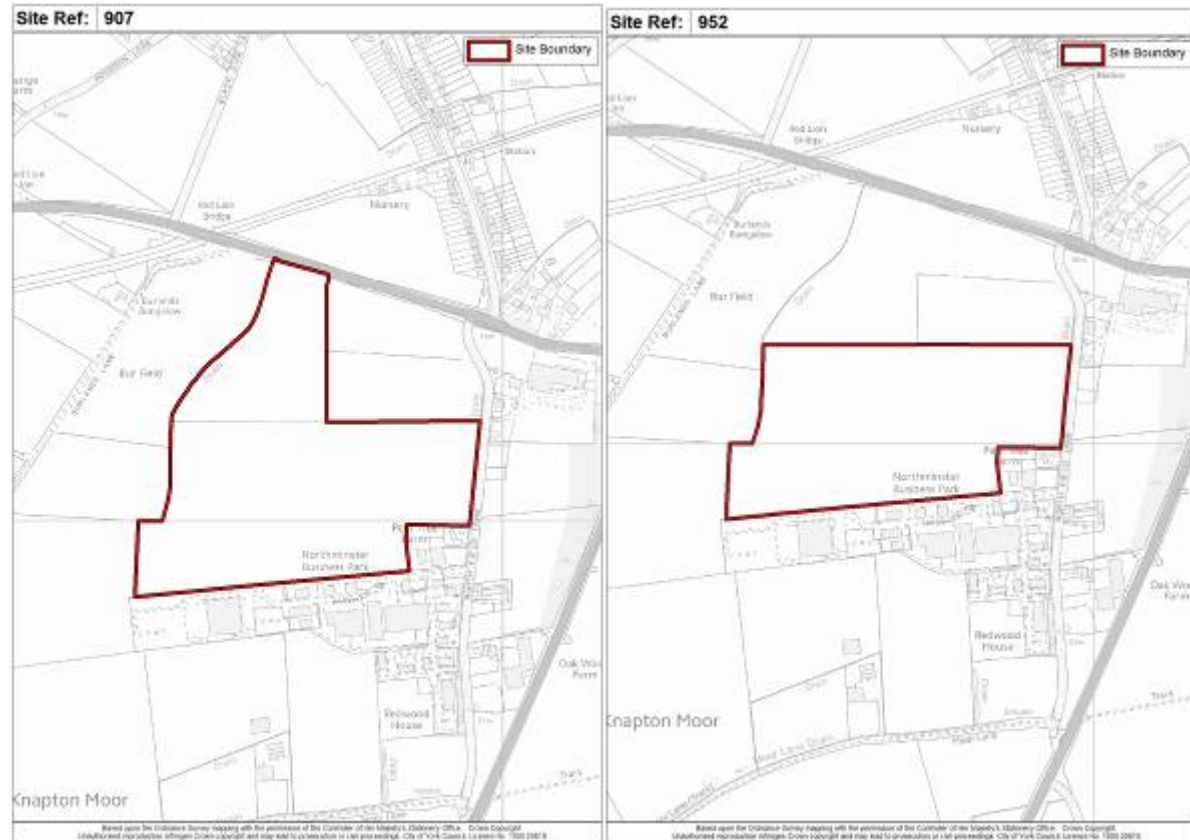
PMSID 354 Peter Vernon and Co

Given that the land to the south of Poppleton Park & Ride is now allocated as 'White Land' (without any designation) in the Poppleton Neighbourhood Plan (2017), the land should properly be considered as a housing allocation given the objectively assessed need for housing. As a matter of principle therefore, the allocation of this site for housing must be preferred.

Site Plan showing proposed modifications, where relevant

PMSID 354 Peter Vernon and Co - No boundary map provided to confirm extent of land.

Previous submission plan at Reg 19 consultation (2018) (Site 907) included below for information. Also related to site boundary 952.



Site 957 – Malton Road Industrial Estate

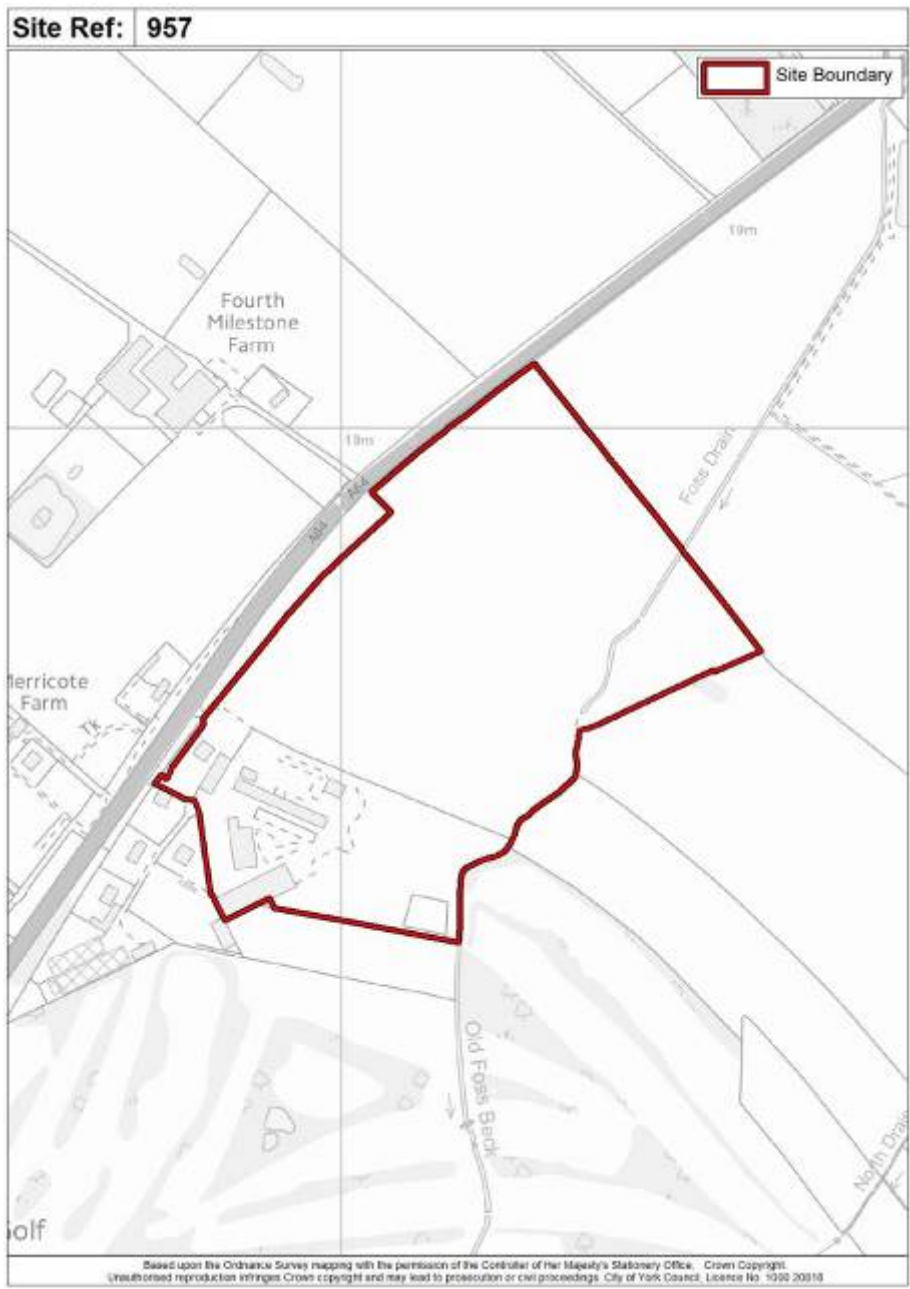
Summary

PMSID 589 O'Neill Associates OBO Malton Road Developments

14.66 hectares at the Business Park should be included as an employment allocation in Policy EC1 to ensure a sound plan. Should the Inspector conclude the site is not required at the present time to meet the employment land requirement, the undeveloped 10.66 hectares to the north of the business park should be designated as safeguarded land in the Local Plan.

Site Plan showing proposed modifications, where relevant

PMSID 589 O'Neill Associates OBO Malton Road Developments - No map submitted. Previous submission plan at Reg 19 consultation (2018) (Site 907) included below for information.



Site 959 – Kettlestring Lane, Clifton Moor

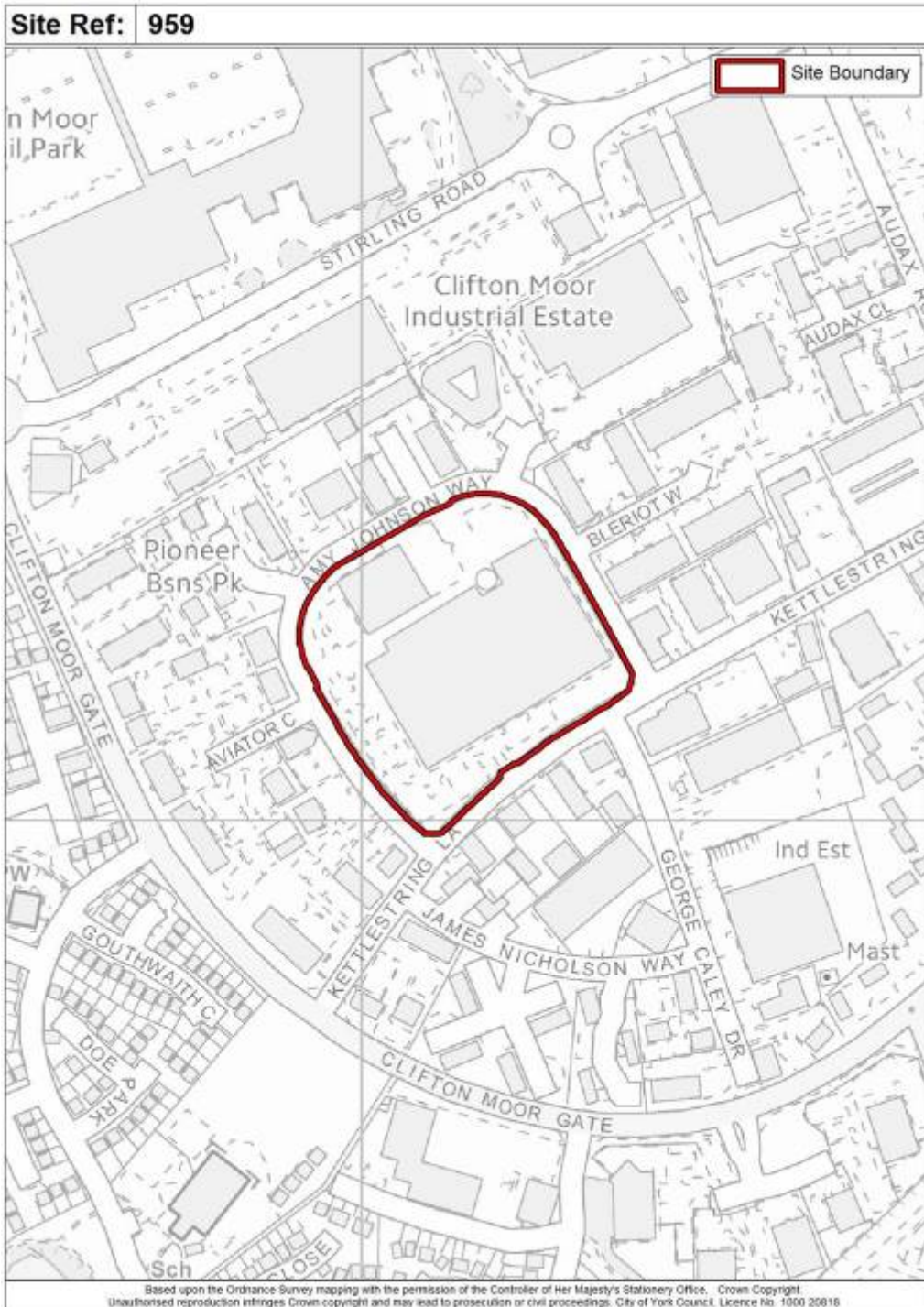
Summary

PMSID 350 Carter Jonas OBO Picton Capital

In order to meet York's true housing need SHLAA site reference 959 Kettlestring Lane, Clifton Moor should be included in the plan as a housing allocation.

Site Plan showing proposed modifications, where relevant

PMSID 350 Carter Jonas OBO Picton Capital – Submission confirms reference to site 959



Site 970 – Land at Princess Road

Summary

PMSID 210 Lichfields OBO Wakeford Properties

Allocate land at Princess Road, Strensall, as residential development or safeguarded land on the Local Plan Proposal Map. Refer to site plan submitted with representation

Site Plan showing proposed modifications, where relevant

PMSID 210 Lichfields OBO Wakeford Properties - Submitted site plan confirms boundary of site 970 as follows:



Site 971– Land at Southfields Road

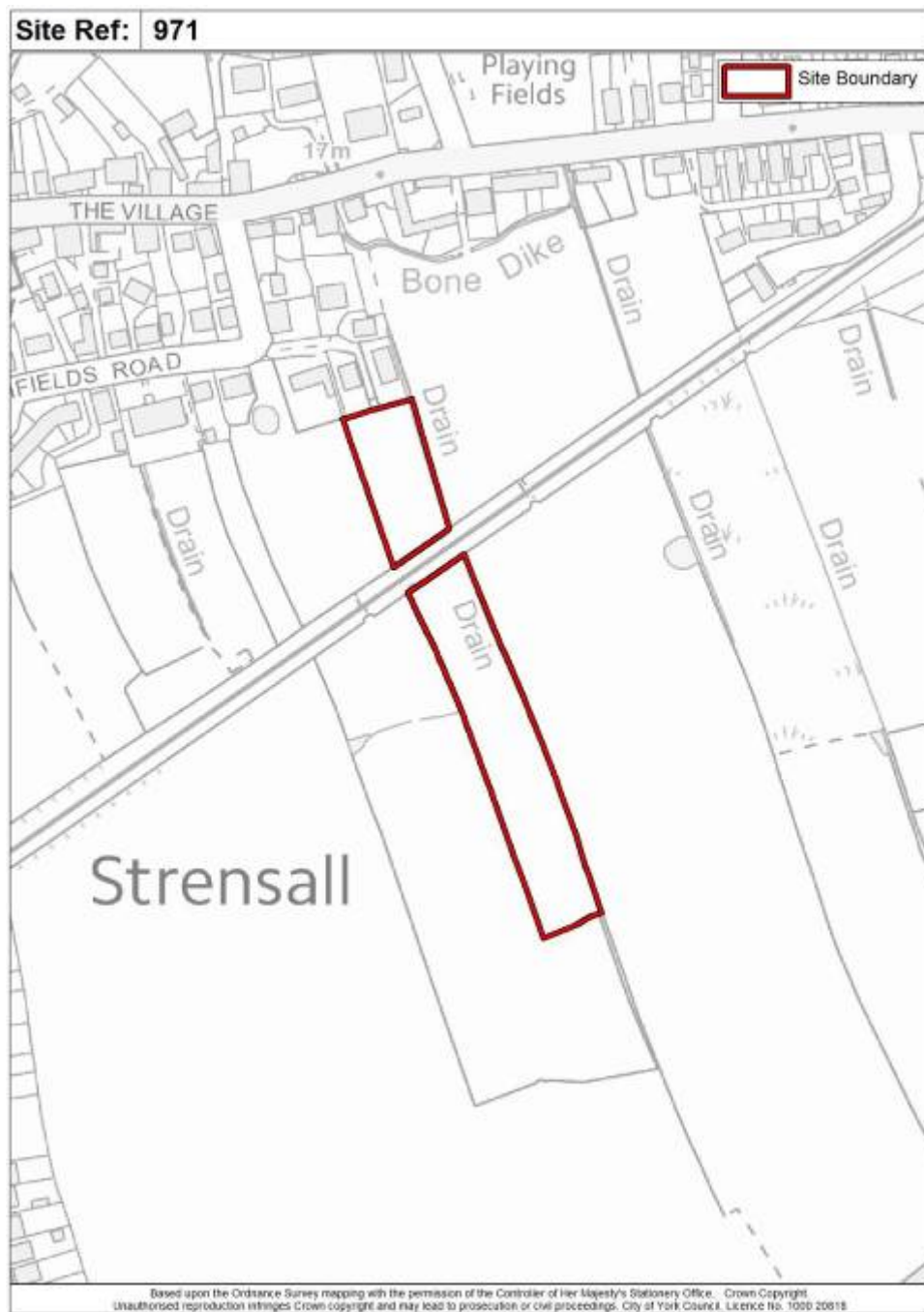
Summary

PMSID 210 Litchfield's OBO Wakeford Properties

Allocate land at Southfields Road, Strensall, as residential development or safeguarded land on the Local Plan Proposal Map. Refer to site plan submitted with representation

Site Plan showing proposed modifications, where relevant

PMSID 210 Lichfields OBO Wakeford Properties - Submitted site plan confirms boundary of site 971 as follows:



Site 995 – Poppleton Glassworks

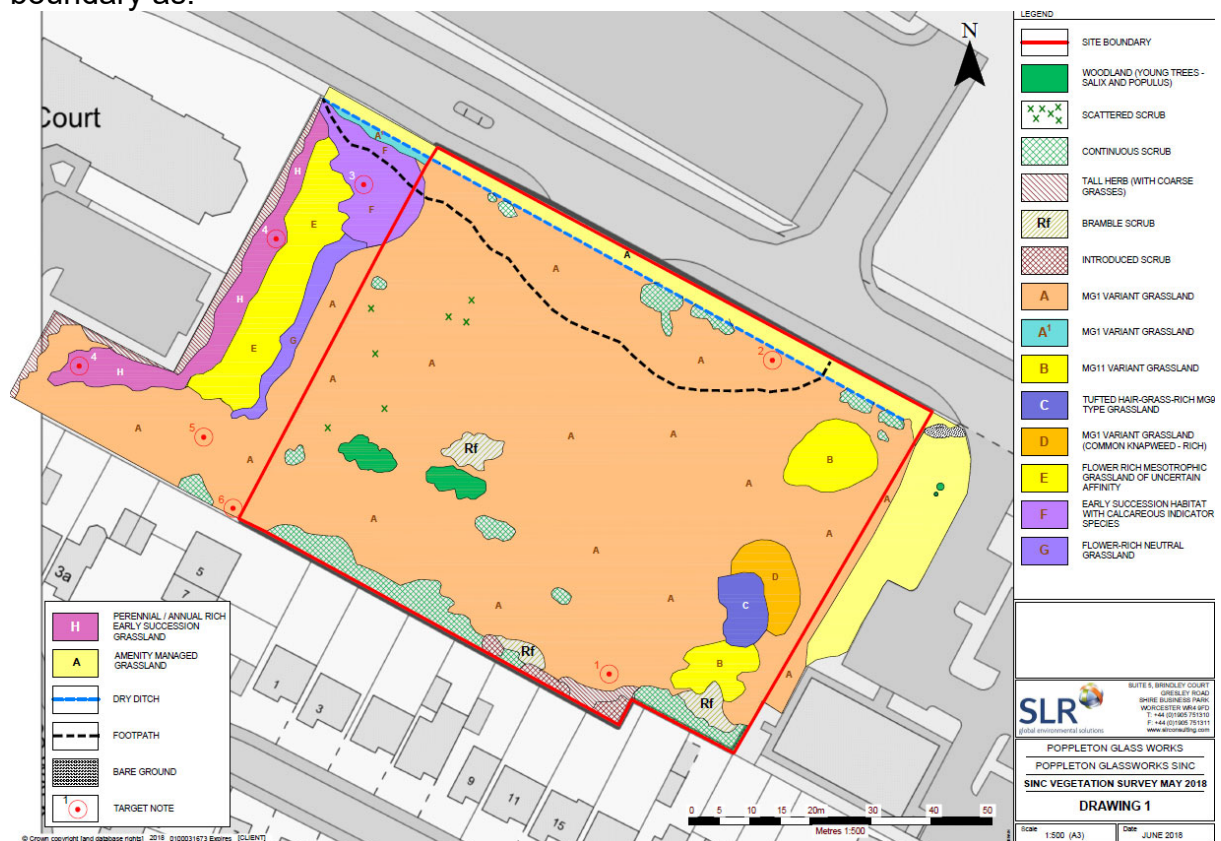
Summary

PMSID 218 JLL OBO Industrial Property Investment Fund (IPIF)

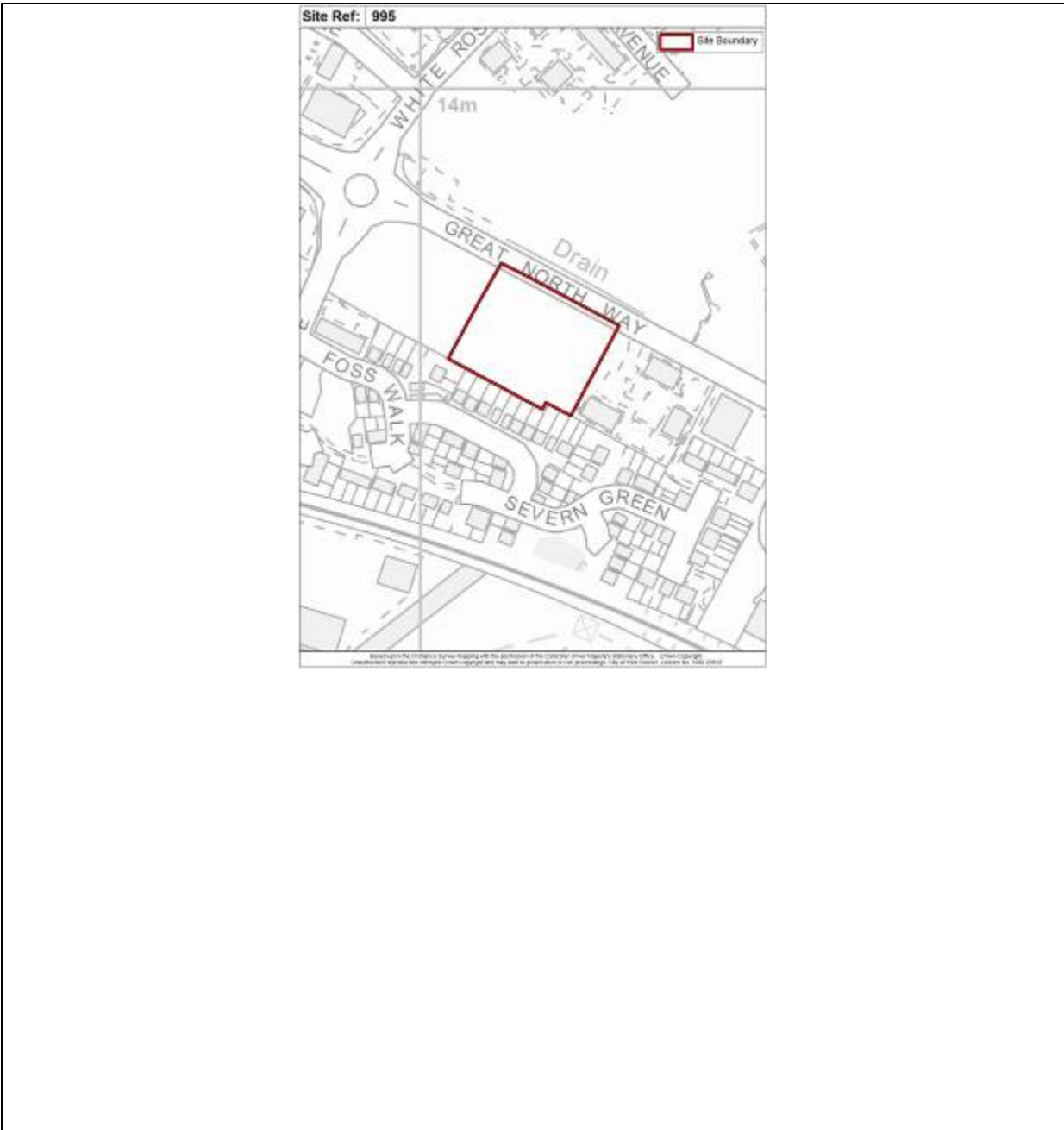
Poppleton Glassworks should have SINC designation removed and be reconsidered as an allocation for employment use. Evidence has been submitted to the Inspector to show that the site does not meet the criteria to qualify as a SINC. Landowner is willing to pay to provide off-site habitat creation if site is taken forward.

Site Plan showing proposed modifications, where relevant

PMSID 218 JLL OBO Industrial Property Investment Fund – Submission confirms boundary as:



NB: The proposed boundary for Poppleton Glassworks recorded by CYC (site 995), included below for information:



Site 982 – Racecourse Greenhouses

Summary

PMSID 122 Turnberry OBO York Racecourse
As part of green belt boundary relaxation and review of the race course estate the current green houses could be relocated and site near Middlethorpe village used as a brownfield site for housing.

Site Plan showing proposed modifications, where relevant

PMSID 122 Turnberry OBO York Racecourse – No Map submitted

NB: The proposed boundary for Racecourse Greenhouses recorded by CYC (site 982), included below for information:



NEW Site – Lindum Business Park, Elvington

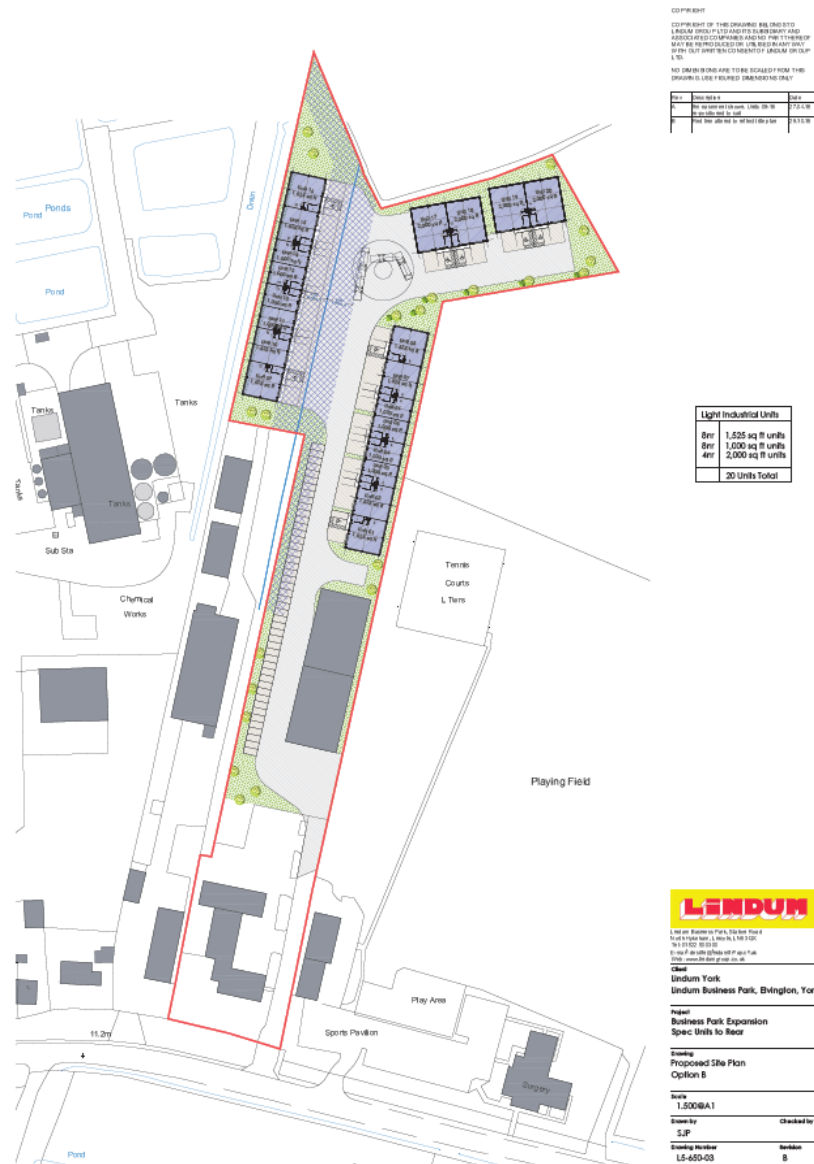
Summary

PMSID 859 Freeths LLP OBO The Lindum Group Ltd

New site for employment use at Lindum Business Park, Elvington. Currently pending planning application [18/02744/OUTM] submitted for the erection of 20no. Employment Units (Use Classes B1, B2 and B8). Support change to Green Belt (PM40).

Site Plan showing proposed modifications, where relevant

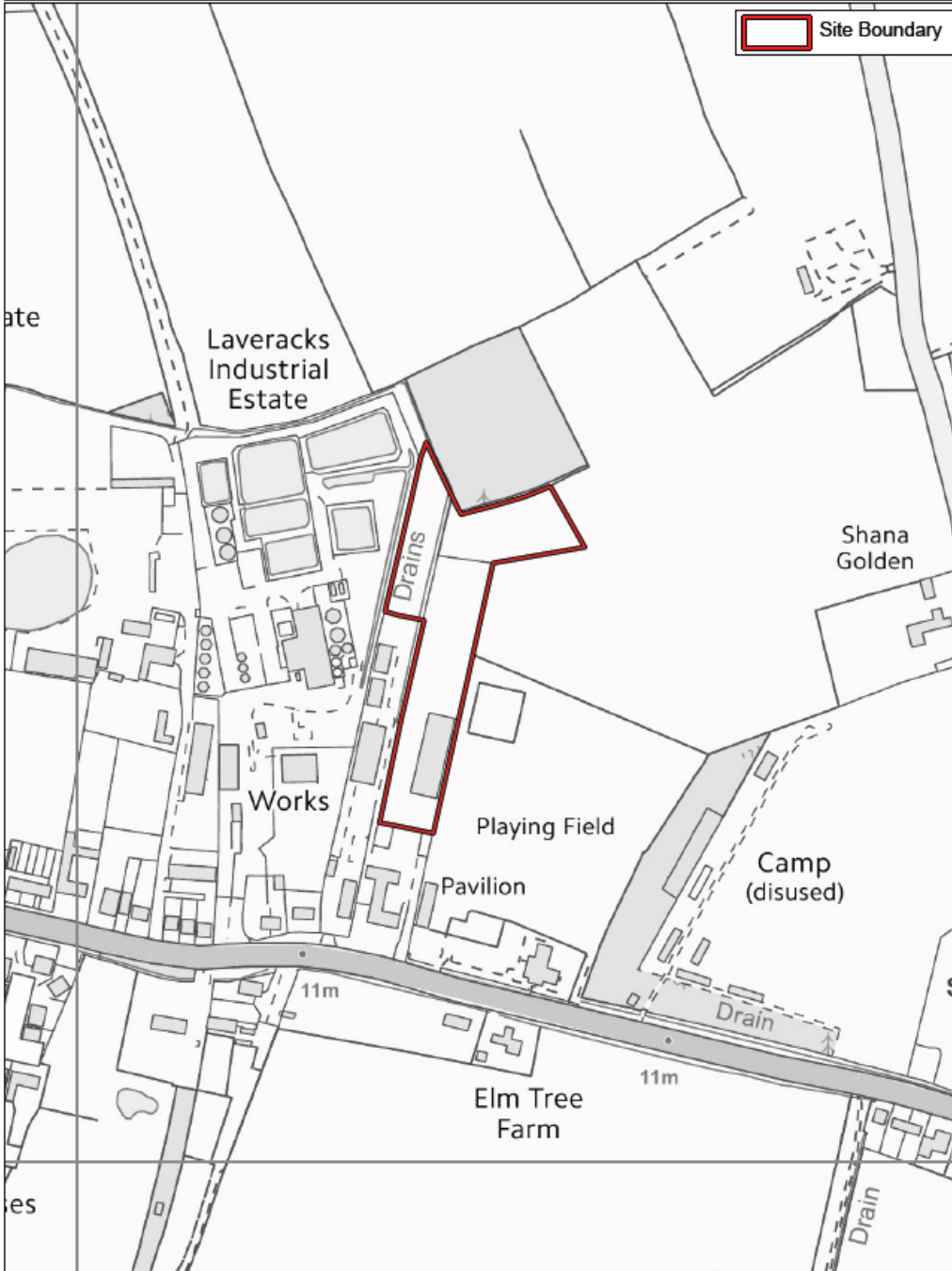
PMSID 859 Freeths LLP OBO The Lindum Group Ltd – proposed site plan.



NB: New site submitted recorded by CYC as site ref 1001, included below for information:

Site Ref: 1001

Site Boundary



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

Site 804 - Clifton Gypsy and Traveller Site

Summary

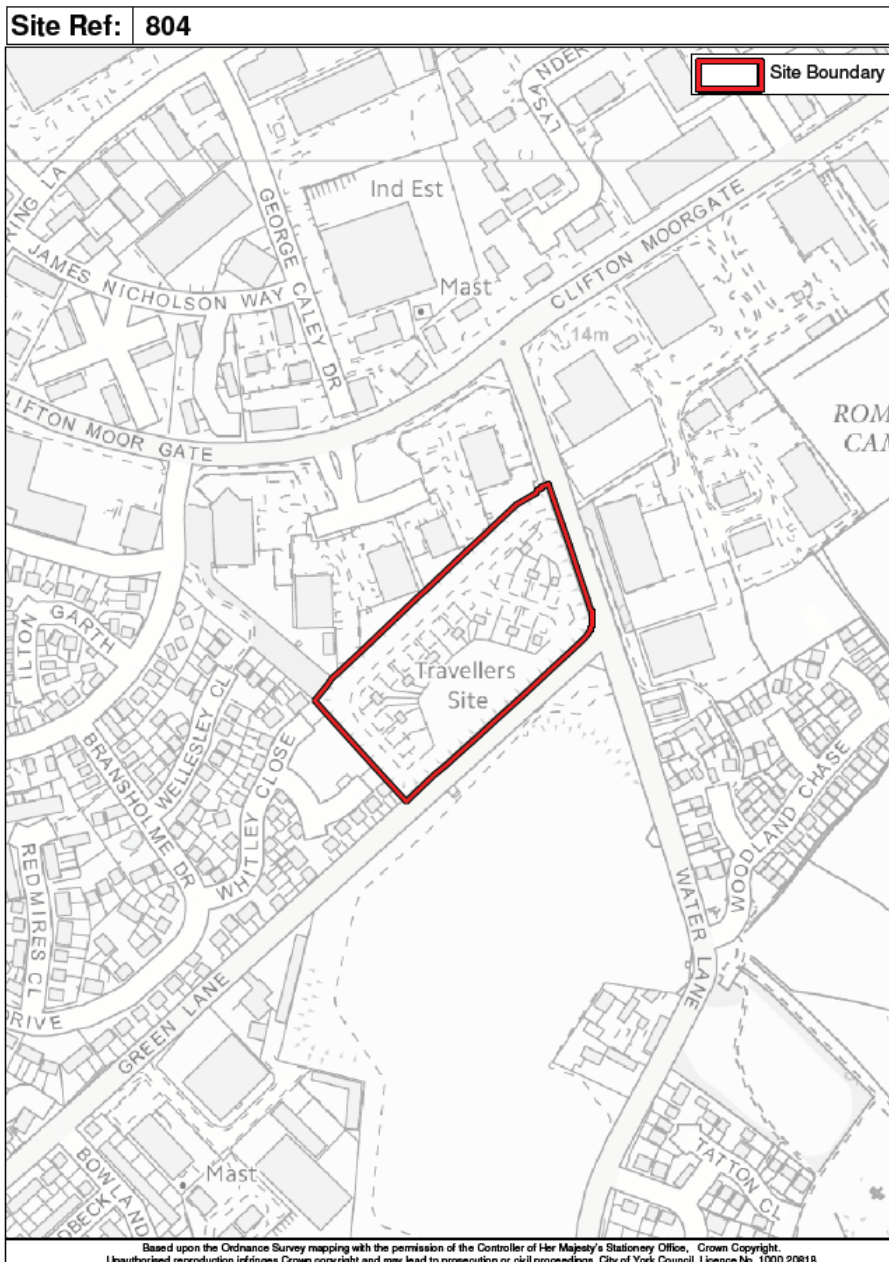
PMSID 60 Michael Hargreaves Planning on Behalf of the Travellers Trust

Land at existing Gypsy and Traveller site at Clifton should be allocated for a 6-8 pitch extension.

Site Plan showing proposed modifications, where relevant

PMSID 60 Michael Hargreaves Planning on Behalf of the Travellers Trust - No Map supplied

NB: The boundary for Clifton Gypsy and Traveller Site recorded by CYC (site 804), included below for information:



14. Alternative GB boundaries proposed through consultation

14.1 The following further modifications to the proposed Green Belt boundary were submitted in response to consultation on the Local Plan Proposed Modifications 2019. The modifications are presented here without prejudice to future discussion about their status, nor to the implications for, or any resulting changes to, the wider Green Belt boundary.

14.2 Modification to TP1 Addendum methodology/ GB purposes

Green Belt boundary modification at:

Summary

PMSID 0118 Historic England ~ Ian Smith

Amend Figure 3 to better reflect the elements which were identified in the Heritage Topic Paper as contributing to the special character of the setting of the city. Amend the 'areas retaining rural setting' to read 'areas which regulate the size and shape of the urban area/contribute to the impression of a free-standing city'. Extend existing 'areas retaining rural setting' to include four additional areas i. To the east of the city, all the land between the A64 and Heworth and Derwenthorpe to the north of Osbaldwick Village ii. To the north of the city, the land between the A1237 and Avon Drive, Huntington and between North Lane, Huntington and the ring road. iii. To the south east, between the A64 and Lakeside Way and between the A64 and the Grimston Bar Park & Ride site. iv. To the south west, all the land between the A1036 and Moor Lane.

Site Plan showing proposed modifications, where relevant

No plan provided

14.3 Modifications to the Inner Green Belt Boundary (TP1 Add. Annex 3)

Green Belt boundary modification at: (Annex 3) Inner boundary Section 1 map

Summary

PMSID 0118 Historic England ~ Ian Smith

Amend inner boundary section 1 map to reflect the work set out in the Heritage Topic Paper. Amend the area identified as 'protecting the special character and setting' to include all the land between the ring road and the edge of the existing build up area, and to include the land lying to the west of the A1237.

Site Plan showing proposed modifications, where relevant

No site plan provided

Green Belt boundary modification at: (Annex 3) Inner boundary Section 1 Boundaries 9 & 10 - Alt Site 942 Land at Chapelfields

Note that comments have been summarised in relation to the **alt site boundary 942 (Land at Chapelfields)**. Refer to **Section 13 and Section 14.5**.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 2 map**

Summary

PMSID 0118 Historic England ~ Ian Smith

Annex 3, page A3:44. Amend inner boundary section 2 map to reflect the work set out in the Heritage Topic Paper. Amend the area identified as 'protecting the special character and setting' to include the land between the A1237 and the edge of Knapton, the area between the Wyevale Garden Centre and the Northminster Business Park and the land lying to the west of the Wyevale Garden Centre and the Northminster Business Park.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 2 Boundaries 1 to 10 – East of A1237 South of Boroughbridge Road**

Summary

PMSID 0894 – Carter Jonas OBO Karbon Homes

Within the Boroughbridge Road Quadrant an alternative which has not been considered is the ring road (A1237). This would provide a clearly defined and strong boundary to the Green Belt in this location as it would perform well under NPPF paragraph 139(f) in respect of a physical feature that is recognisable and permanent.

Note that additional comments have been summarised in relation to the **Alt site 871 (Land at North Field)** which would abut Section 2 boundaries 5 to 8. Refer to **Section 13 and Section 14.5.**

Note that additional comments have been summarised in relation to the **site ST29 (Land at Broughbridge Road)** which would abut Section 2 boundaries 9 and 10. Refer to **Section 13 and Section 14.5.**

Site Plan showing proposed modifications, where relevant

PMSID 0894 – Carter Jonas OBO Karbon Homes

No plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 3 Boundaries 8 & 9 - St Olaves Junior School**

Summary

PMSID 0883 - O'Neill Associates OBO St Peters School

Proposed revision of PM30 follows the existing St Olaves Junior School boundary and includes the public footpath at its western boundary (area shaded in yellow). This area of land should be excluded from the Green Belt.

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 4 map**

Summary

PMSID 0118 Historic England ~ Ian Smith

Annex 3, page A3:133. Amend inner boundary section 4 map to reflect the work set out in the Heritage Topic Paper. Amend the area identified as 'protecting the special character and setting' to include the land to the north of the A1237.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 5 map**

Summary

PMSID 0118 Historic England ~ Ian Smith

Annex 3, page A3:170. Amend inner boundary section 5 map to reflect the work set out in the Heritage Topic Paper. Amend the area identified as 'protecting the special character and setting' to include the land between Earswick and Huntington, the area between the A1237 and the built up areas of Huntington and Monk's Cross, and the land to the north east of the A1237.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 5 Boundaries 1 & 1 - Alt Site 141 Northfields Sports Park**

Note that comments have been summarised in relation to the **alt site boundary 141 (Northfields Sports Park)**. Refer to **Section 13** and **Section 14.5**.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 5 Boundary 20 - Alt Sites 191 and 4.**

Note that comments have been summarised in relation to the **Alt Site 191 (Land at Avon Drive Huntington)** and **Alt site 4 (Land at North Lane Huntington)** in **Section 13**

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 5 Boundaries 30 & 31 - Former ST11 Land at New Lane Huntington**

Note that comments have been summarised in relation to the site **Former ST11 (Land at New Lane Huntington)**. Refer to **Section 13** and **Section 14.5**.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 5 Boundaries 32 & 35 - Former H50 Land at Malton Road**

Note that comments have been summarised in relation to the site **Former H50 (Land at Malton Road)**. Refer to **Section 13** and **Section 14.5**.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 6 map**

Summary

PMSID 0118 Historic England ~ Ian Smith

Amend inner boundary section 6 map to reflect the work set out in the Heritage Topic Paper. Amend the area identified as 'protecting the special character and setting' to include all the land between the A64 and the existing built up area to the south of Stockton Lane, the area between the A64 and the electricity substation adjacent to Osbaldwick Link Road, and the land to the east of the A64

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 map**

Summary

PMSID 0118 Historic England ~ Ian Smith

Amend inner boundary section 7 map to reflect the work set out in the Heritage Topic Paper. Amend the area identified as 'protecting the special character and setting' to include all the land between the A64 and Lakeside Way, the land between Hull Road and the University, and the land to the east and south east of the A64.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundaries 3 to 14 - South of the University of York**

Summary

PMSID 0849 - O'Neill Associates OBO University of York

Section 7 Boundary 2: See plan below – No written explanation provided

Section 7 Boundaries 3 to 6: Area E on submitted map below –

It is stated that the Green Belt boundary presented by the council is not defensible and the alternative of the straight boundary to the South of the A64 is suggested as more suitable. The landscape buffers northern edge that the council has utilised is protected by an adopted master plan and reserved matter planning permission so that it does not need a Green Belt designation to preserve it.

Section 7 Boundary 7: Area D on submitted map below - The University proposes that a 26ha site be allocated to the south of the Campus East lake and distant from A64. A 30ha landscape buffer would be provided as part of the development.

Section 7 Boundaries 8 & 9: Area C on submitted map below –

The CYC presented detailed inner green belt boundaries are proposed to include land in the Green Belt with is included in outline planning permission within area allocated for development. One section has recently been granted planning permission for student housing. It is considered inappropriate for this exercise to inhibit a current outline planning consent which still has 8 years to run.

Section 7 Boundary 10: Area B on submitted map below –

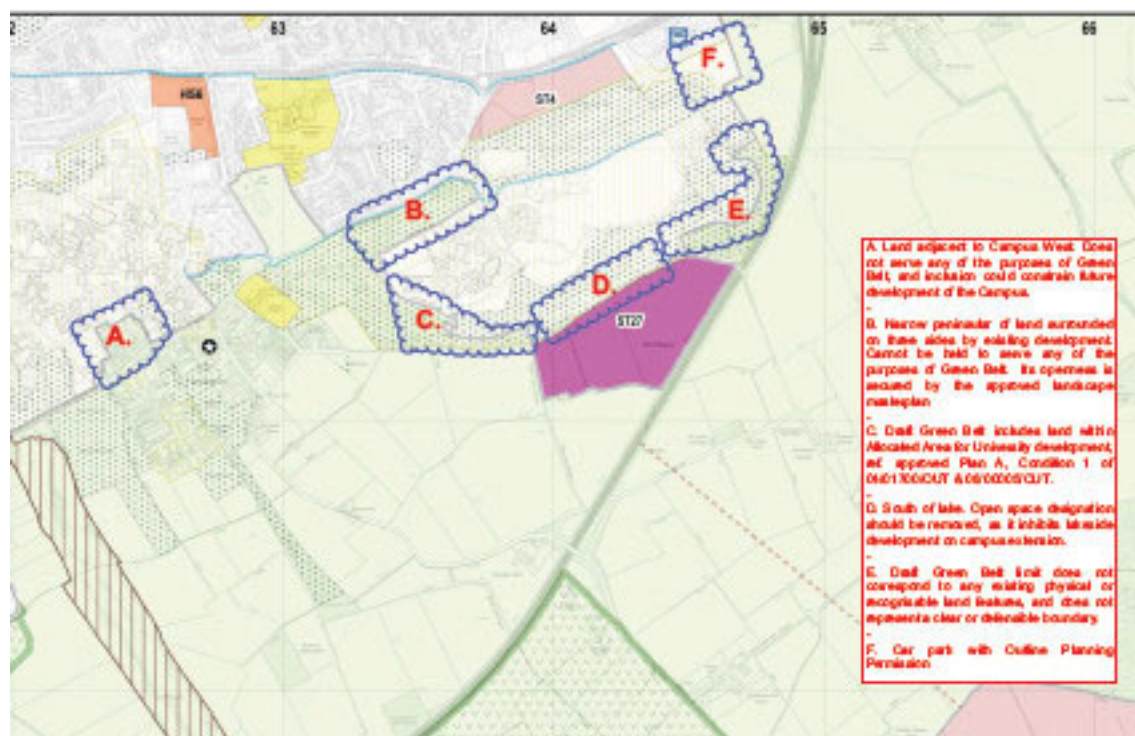
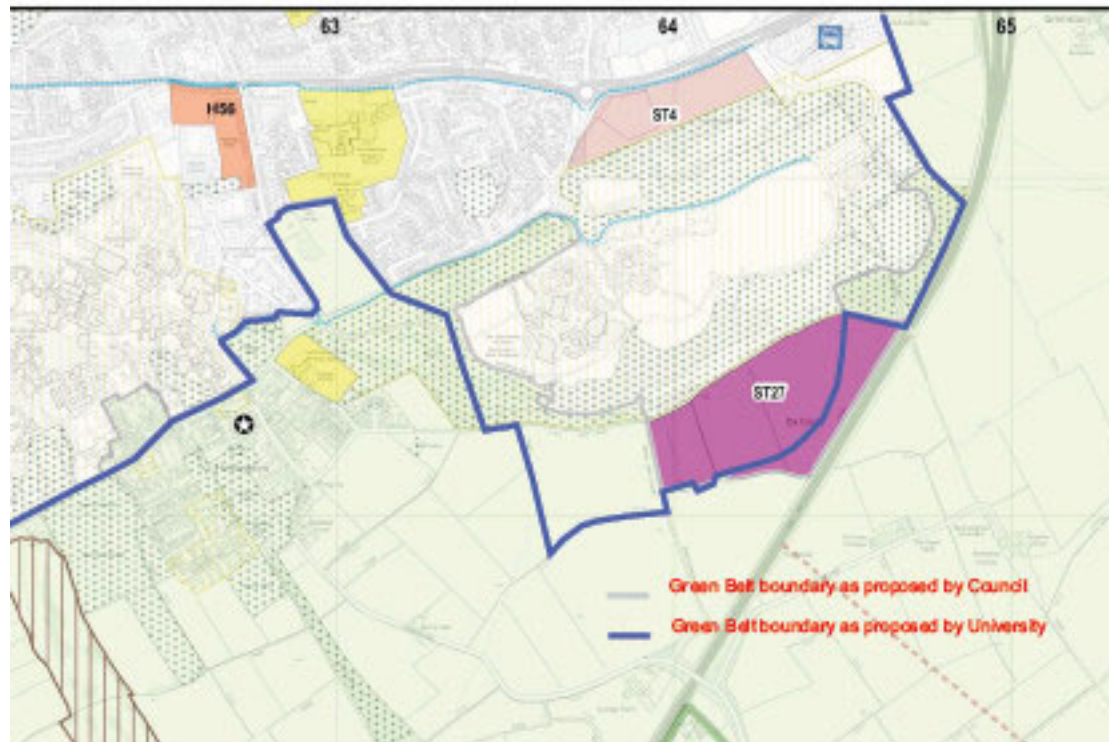
The strip of landscape buffer between the built-up area of Campus East and the housing estate of Badger Hill to the north is surrounded by development on 3 sides, the western short side only gives onto open land. The area is not sufficiently large to be able to perform a Green Belt purpose and is constrained by an approved landscape reserved matters approval. Green Belt policy should not be used where other planning policy can serve the same purpose.

Section 7 Boundary 11: See section 13 and section 14.5 Re Alt Site 170.

Section 7 boundaries 13 & 14: Area A on submitted map below –

A small enclave of houses, adjacent to the southern boundary of Campus West, is presented by CYC as part of the Green Belt. It is suggested that this area is surrounded on all 4 sides by built development and has no openness to preserve.

Site Plan showing proposed modifications, where relevant



NB the boundary of ST27 presented is not that as represented on the 2018 Local Plan Submission document – details of this alternative boundary are presented in Section 13 and Section 14.5.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 2**

Summary

PMSID 0118 Historic England ~ Ian Smith

A more logical and defensible boundary would be the road that links the Park & Ride to the Sports Centre.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 3**

Summary

PMSID 0118 Historic England ~ Ian Smith

A more logical and defensible boundary would be the road that links the Park & Ride to the Sports Centre.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 4**

Summary

PMSID 0118 Historic England ~ Ian Smith

A more logical and defensible boundary would be Lakeside Way.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 5**

Summary

PMSID 0118 Historic England ~ Ian Smith

A more logical and defensible boundary would be Lakeside Way.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 6**

Summary

PMSID 0118 Historic England ~ Ian Smith

A more logical and defensible boundary would be Lakeside Way.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 7**

Summary

PMSID 0118 Historic England ~ Ian Smith

A more logical and defensible boundary would be Lakeside Way

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 8**

Summary

PMSID 0118 Historic England ~ Ian Smith

A more logical and defensible boundary would be Lakeside Way

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundaries 15 and 16 - Alt Site 629/862 - Land at the Retreat
Heslington Rd**

PMSID 603 Savills (UK) Ltd OBO Retreat Living Ltd

The proposed extent of Green Belt is considered to be unsound as the proposed inner boundary is tightly drawn to unreasonably restrict development opportunities which are considered to necessary for the growth of York; The Southern boundary of The Retreat Estate (Alt Site 629) would form a logical, permanent and strong Green Belt boundary and a well-defined edge to the built-up part of the city in this location.

PMSID 916 Carter Jonas OBO Schoen Clinic York Ltd/ Retreat Living

Annex 3 Section 7 boundaries 15 and 16 assess the proposed boundary to the immediate west and north of the Retreat. However, this assessment

- a) fails to objectively consider other potential boundaries and
- b) seeks to consider the green belt merits of the Retreat as a whole rather than in respect of the different character areas that exist.

It is suggested that the grounds of the Retreat should not be deemed within the current General Extent of Green Belt. If Walmgate Stray is ultimately included within the designated Green Belt, the southern boundaries of Low Moor Allotments and The Retreat would give a clearly defined and strong boundary to the Green Belt at this point, marking the urban edge of this part of York.

Note that comments have been summarised in relation to the alt site 629/862 (Land at the Retreat). Refer to Section 13 and Section 14.5. These sites also adjoin the area of change at PM35 – Policies Map Green Belt Change – Heslington Road and Garrow Hill.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 7 Boundary 18 - Land at Imphal Barracks**

Summary

PMSID 0345 Avison Young OBO Defence Infrastructure Organisation (DIO)

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The eastern Green Belt boundary of land at Imphal Barracks should be redrawn to exclude land to the east of Holland Road from Green Belt. See submitted Plan

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 8 Boundary 14 - York Racecourse**

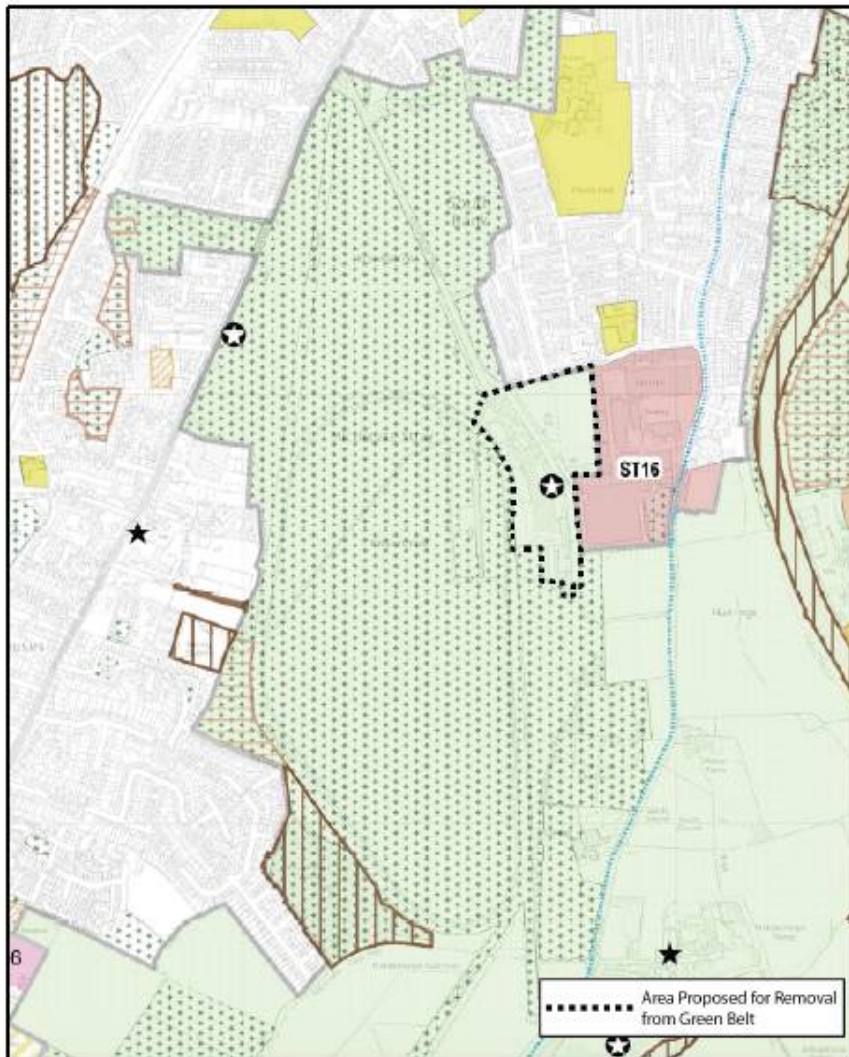
Summary

PMSID 0122 Turnbury OBO York Racecourse

Green belt boundary around York Race Course should be relaxed. Should be more explicitly supportive of hotel developments at existing tourism sites.

Site Plan showing proposed modifications, where relevant

Appendix A – Main developed area of the Racecourse to be removed from Green Belt designation



**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 8 Boundary 23 - Little Hob Moor - PM36**

Summary

PMSID 0172 - Councillor Stephen Fenton

No compelling justification why this area should be afforded less protection than the rest of Micklegate Stray, which would continue to enjoy Green Belt protection. The long term strategic permanence of the Green Belt is determined by its ability to endure over the lifetime of the Plan and beyond, Little Hob Moor meets this criteria for inclusion in the Green Belt.

Site Plan showing proposed modifications, where relevant

No site plan provided –
NB This proposed change relates to PM 36

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 8 Boundaries 25 - Land at Cherry Lane and Racecourse Stables**

Note that comments have been summarised in relation to the sites **Former H2a (Racecourse Stables) and H2b (Land at Cherry Lane)**. Refer to **Section 13 and Section 14.5**.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 8 Boundaries 33 - East of York College**

Note that comments have been summarised in relation to the **Alt Site 221 (Agricultural Land, Sim Balk Lane)**. Refer to **Section 13 and Section 14.5**.

**Green Belt boundary modification at: (Annex 3) Inner boundary
Section 8 Boundaries 34 – South of York College**

Note that comments have been summarised in relation to the **Alt Site 222 (Agricultural Land, Sim Balk Lane)**. Refer to **Section 13 and Section 14.5**.

14.4 Further Modifications to Urban Area's in the general extent of York's Green Belt (TP1 Addendum Annex 5)

**Green Belt boundary modification at:
Bishopthorpe Village**

Summary

PMSID 181 Gateley Legal OBO Gateway Developments Ltd

See sections on:

Alt Site 223 (Agricultural Lane, Copmanthorpe Lane, Bishopthorpe) and

Alt Site 224 (Agricultural Lane, Church Lane, Bishopthorpe)

in Section 13 and Section 14.5.

Site Plan showing proposed modifications, where relevant

Site plans provided in sites section

**Green Belt boundary modification at:
Copmanthorpe Village**

Summary

PMSID 0339 - Barton Willmore OBO Barratt and David Wilson Homes

PMSID 600 DPP OBO Shepherd Homes

See Sections on:

Former ST13

in Section 13. No green belt justification submitted beyond contributing to revised housing need figure.

PMSID 220 O'Neill Associates OBO Mr M Ibbotson

See Sections on **Former SF5** in Section 1.

Site Plan showing proposed modifications, where relevant

Site plans provided in Sites section.

**Green Belt boundary modification at:
Dunnington Village**

Summary

PMSID 592 O’Neill Associates OBO Yorvik Homes
See Sections Former H33 in Section 13 and Section 14.6

PMSID 890 Johnson Mowatt OBO Yorvik Homes
See Sections on **Alt Site 737** in Section 13 and Section 14.6

Site Plan showing proposed modifications, where relevant

Site plans provided in sites section

**Green Belt boundary modification at:
Elvington Village**

Summary

PMSID 0091 - Strathmore Estates OBO Westfield Lodge and Yaldara Ltd.
See Sections on Former SF10: Riverside Gardens, Elvington in Section 13, However
- no green belt justification submitted

PMSID 0102 – Elvington Parish Council (et al)
Suggest that the council’s intention to remove Elvington from the green belt renders the plan unsound.
Several commentators suggested that H26 as an alternate site would be a more appropriate area to build dwellings.

PMSID 0420-3 – Private Owner
Redefine the greenbelt boundary around Elvington Industrial Estate to exclude the residential housing estates of Elvington Park, The Conifers and Jubilee Court. Do not treat Elvington Village as an inset village within the green belt.

Nearly all commented that Elvington should remain washed over

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Haxby and Wigginton**

Summary

PMSID 0091 – Strathmore Estates OBO Westfield Lodge and Yaldara Ltd
The proposed detailed boundary on the southern edge of Haxby it is illogical, given the Haxby Gate ribbon development (east of H37) protruding southwards. H37 falls on the southern urban edge of the Haxby urban area which is inset within the Green Belt. Previously the site has been proposed to be removed from the Green Belt as part of this Local Plan Review. However the Publication Draft and the Proposed Modifications now propose to retain this formerly allocated site within the Green Belt. See Sections on Former H37 in Section 13 and Section 14.5

PMSID 0125 – Persimmon Homes

See Sections on Former H54 Whiteland Field, Usher Park in Section 13 and Section 14.5

See Sections on Alt Site 165 in Section 13 and Section 14.5

PMSID 0368 –**PMSID 0598 – DPP OBO Linden Homes Strategic Land**

See Section on Former SF4 Land North of Haxby in Section 13

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Knapton Village**

Summary**PMSID 0368 - Indigo Planning (Now part of WSP) OBO Novus Investments**

Respondent proposes Green Belt extends to Knapton Village boundary only and that the proposed 'washing over' of the village by the Green Belt be removed

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Skelton Village**

Summary**PMSID 0601 – DPP OBO Private Landowner**

See Sections on Former H34 in Section 13 but no green belt justification beyond contributing to revised evidence base was submitted.

Site Plan showing proposed modifications, where relevant

No site plan provided - See Section on Former H34 in Section 13

**Green Belt boundary modification at:
Strensall Village**

Summary**PMSID 0607 – Lichfields OBO Taylor Wimpey Ltd**

Define the boundary of the Green Belt around Strensall such that land at Brecks Lane (Former H27) is excluded and allocated for development or safeguarded land to meet the housing needs of the community. The Land at Brecks Lane does not serve a Green Belt function.

PMSID 0210 Lichfields OBO of Wakeford Properties

See Sections on Alt Site 970 and 971 in Section 13 and Section 14.5

PMSID 0260 – Pegasus OBO Lovell Development Ltd

Strensall is a sustainable settlement. Following the removal of the Queen Elizabeth Barracks Allocation, it is appropriate for Strensall to continue to contribute to

accommodate growth sustainably over the full period of the Plan with sufficient flexibility for long-term requirements.

Land at the Former SF1 (south of the railway line) is put forward as a sustainable alternative location for this growth as there are stated to be fewer constraints to overcome than the Barracks site, and is accessible to the existing facilities and services within the village and could benefit the existing community.

Land to the north of the railway line (Alt site 322) is also proposed either in conjunction with land at SF1 or in isolation to meet these needs as it is well connected to the existing settlement and has clearly defined boundaries by virtue of existing residential development and the railway line to the south. The site can therefore be released from the Green Belt without causing harm to the openness of the Green Belt and resulting in unrestricted urban sprawl.

PMSID 0870 Mr Coverdale

See Sections on Alt Site 7: Duncombe Farm Strensall - in Section 13 However - no green belt justification submitted.

Site Plan showing proposed modifications, where relevant

PMSID 0607 – Lichfields OBO Taylor Wimpey Ltd –

See section on Former H27 in section 13 and 14.5

PMSID 0210 Lichfields OBO of Wakeford Properties –

See Sections on Alt Site 970 and 971 in Section 13 and Section 14.5

PMSID 0260 – Pegasus OBO Lovell Development Ltd

See sections on Former SF1 and Alt Site 322 in Section 13 and Section 14.5

**Green Belt boundary modification at:
Wheldrake Village**

Summary

PMSID 0342 & PMSID 0909 –

The whole approach to defining York Green Belt needs to be restarted with a new approach otherwise it fails to comply with the Yorkshire and Humberside RSS revocation order, the Yorkshire and Humberside RSS saved policies and parts of the 2012, 2018/19 NPPF where development in villages is not limited infill.

PMSID 91 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

PMSID 866 DPP OBO Mulgrave Properties

PMSID918 Robert Pilcher

See Sections on Former H28 in Section 13 and Section 14.5

Site Plan showing proposed modifications, where relevant

No site plan provided - See Sections on Former H28 in Section 13 and Section 14.5

14.5 Further Modifications relating to sites proposed in the general extent of York's Green Belt (TP1 Addendum Annex 6)

**Green Belt boundary at:
Site ST 7 – Land to East of Metcalf Lane**

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

PMSID 0594 PB Planning OBO TW Fields

Indicate that each of their proposed development options adhere to CYCs analysis and key parameters that need to be followed in order to protect the City's Setting and Character

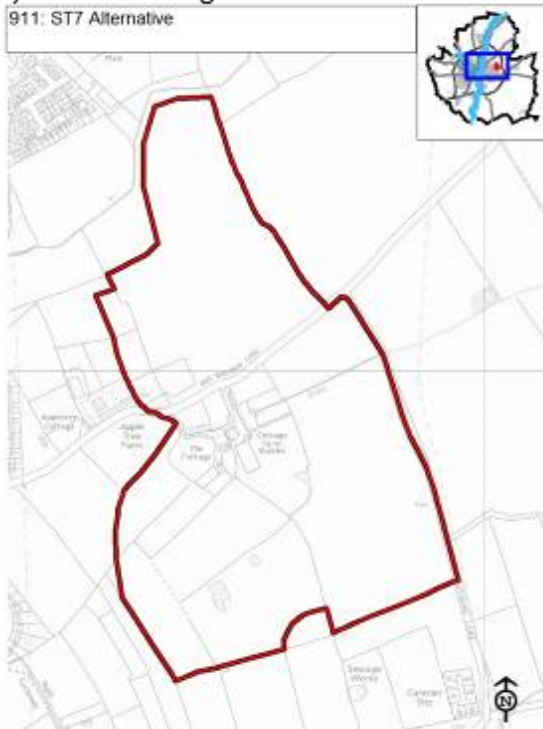
PMSID 0339 Barton Willmore OBO Barratt & David Wilson Homes

As Site ST7 is situated within areas of land which do not need to be kept permanently open the site should be expanded in order to meet York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 0594 - PB Planning OBO TW Fields – Site Plans Submitted.

1) 925 dwellings



2) 1,225 dwellings

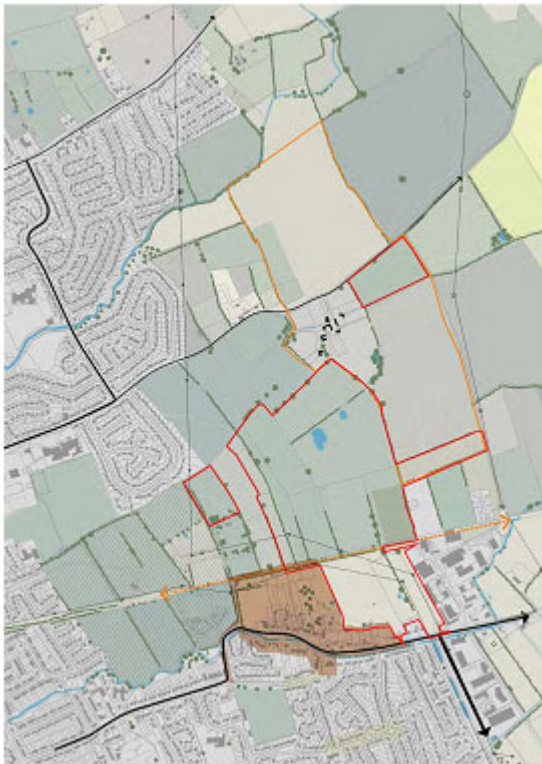


3) 845 dwellings

ST7 - City of York Strategic Land



PMSID 0339 - Barton Willmore OBO Barratt and David Wilson Homes – Site Plan Submitted.



**Green Belt boundary modification at:
ST 8 – Land North of Monks Cross**

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

PMSID 0582 Johnson Mowatt OBO Michael Glover LLP, GM Ward Trust, Curry and Hudson

Objection to the removal of land (identified in orange) from strategic site ST8. Maintain that this land immediately west of Site ST8 as Green Belt is inappropriate, as it would serve no Green Belt function.

Site Plan showing proposed modifications, where relevant

PMSID 0339 - 0582 Johnson Mowatt OBO Michael Glover LLP, GM Ward Trust, Curry and Hudson – Site Plan Submitted.



Green Belt boundary modification at: ST 14 – Land West of Wigginton Road

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

PMSID 0621 PB Planning OBO Barratt Homes & David Wilson Homes and TW Fields

Respondent fully agrees with the assessment of proposed ST14 in the context of Green belt, noting that the southern boundary is less defined and sensitive to change.

The respondent also proposes 3 alternative boundaries each of which they feel adhere to CYC's analysis and key planning parameters that need to be followed in order to protect the City's setting and character. These alternative all seek to expand the southern boundary given its weaknesses as the A1237 will provide a more defensible edge but allows for a Gap to offer separation from the road.

While options 2 and 3 also include expansions to the Northern these are argued to be small scale and would have no impact in respect of coalescence, nature conservation and historic asset preservation

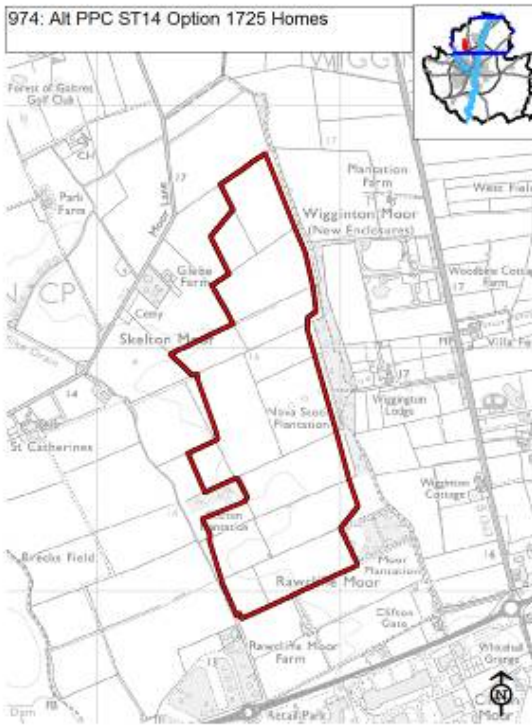
Site Plan showing proposed modifications, where relevant

PMSID 0621 – PB Planning OBO Barratt & David Wilson Homes and TW Fields – Site Plan Submitted.

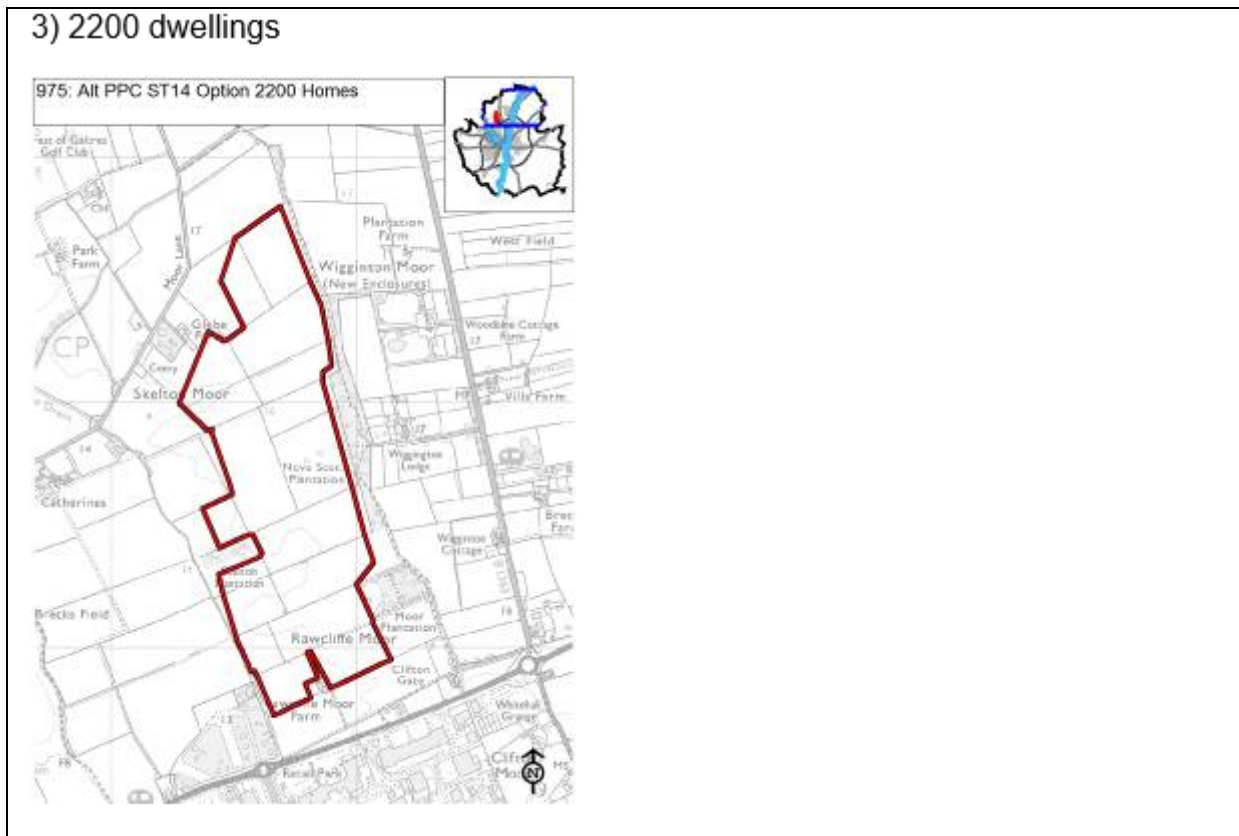
1) 1350 dwellings



2) 1725 dwellings



3) 2200 dwellings



Green Belt boundary modification at: ST 15 – Land West of Elvington Lane

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

Amongst others **Elvington Parish Council** feel there are errors in the assessment of this site as:

- The entire site has previously been accepted as Green Belt (as indicated by a planning inspectors refusals of earlier scheme 04/94316/FULM) and the green belt should be protected in perpetuity.
- The remaining hangers and runway have proven a wildlife rich habitat (The runway is indicated as a nature conservation site)
- The originally proposed site for ST15 is no more visible from the A64 than the new one - The perception of drivers on the A64 is treated as more important than the residents or the economy.
- Concerns are raised as to the impact the site will have on the character and setting of surrounding settlements, the heritage of the airfield and surroundings, as well as impact on the wider Green Belt and its role in biodiversity and climate change.

It is also questioned why the ends of the runways are left undeveloped while green

field land is taken to the North.

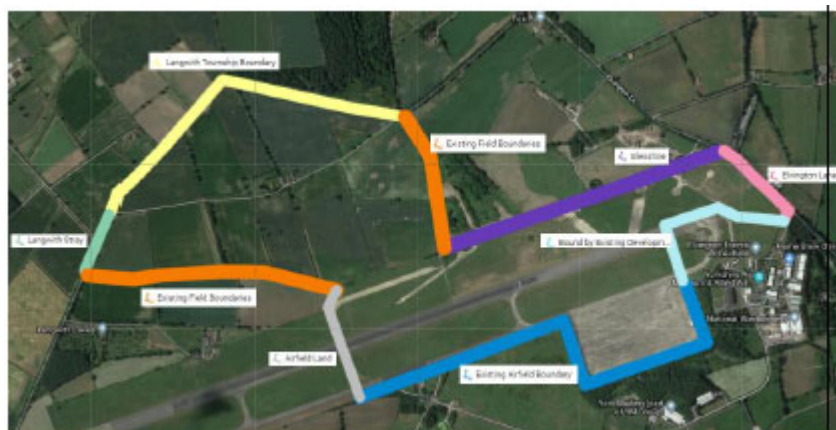
PMSID 0378 Quod OBO Langwith Development Group

The general approach to defining York's Green Belt is considered sound by LDP. However, the boundary proposed for ST15 is stated to be unsound, as it is not positively prepared (ie, it does not meet, in conjunction with other allocations, the true objectively assessed development needs) and the south east and south west boundaries which dissect the former runway are suggested to be weaker than other available alternatives.

The proposed boundary of 'Langwith' as an alternative to ST15 has the potential to deliver housing in larger numbers (and choice) than ST15, with well-defined and recognisable boundaries that are formed of physical and permanent features. The proposed alternative fits with CYC conclusion that exceptional circumstances exist for Green Belt release in this part of York and LDP provide evidence assessing the alternative site against the five purposes of the Green Belt and state that the change will ensure that the resultant Green Belt boundary endures beyond the plan period while being appropriate in heritage terms.

Site Plan showing proposed modifications, where relevant

PMSID 0378 – Quod OBO Langwith Development Group – Site Plan Submitted.



Green Belt boundary modification at: ST 33 – Station Yard Wheldrake

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

There are objections from 2 respondents to the assessment of ST33, who do not feel the site should be removed from the Green belt because:

- NPPF 2012 & 2019 NPPF that state village development should be of restricted infill,
- Purposes 1, 3 & 4 for Green Belt have been ignored/incorrect for ST33.
- There is not adequate access to services.

- In the case of ST33 the educational exceptional circumstances only arise if development proceeds and then becomes a requirement.
- Employment developments have been completed and plans for it show there was never any intention of utilising land for residential development.
- The detailed boundaries is conflict with the GB Boundary description for Wheldrake and the Planning Inspectors comments from the York Green Belt Report.

Site Plan showing proposed modifications, where relevant

No site plan provided

Green Belt boundary modification at: ST36 - Land at Imphal Barracks

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

PMSID 0345 Avison Young OBO Defence Infrastructure Organisation

There is an error in the way in which the inner Green Belt boundary is defined in vicinity of Imphal Barracks. Imphal Barracks should be excluded from the Green Belt as:

- this land is not open and is not characteristic of Green Belt,
- the majority of land is not open, and certainly does not have an open character;
- it is already developed and therefore is not capable of playing a role in checking unrestricted sprawl;
- the land plays no role in preventing neighbouring towns from merging;
- the land is not countryside, and is not performing a role in safeguarding the countryside from encroachment;

Site Plan showing proposed modifications, where relevant

PMSID 0345 – Avison Young OBO Defence Infrastructure Organisation – Site Plan Submitted.



**Green Belt boundary modification at:
ST 27 - University of York expansion (Employment Allocation)**

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

PMSID 0849 - O'Neill Associates OBO University of York

Consideration of the site ST27 in Annex 5 to TP1 does not set out deliberation on the likely requirements of the University over the life of the plan or beyond.

Consequently, whilst the GB boundary is drawn so as to allocate 21.5ha, there is no clear reasoning or explanation why the detailed evidence submitted on 2018 on behalf of the University for an allocation of 26ha has been rejected.

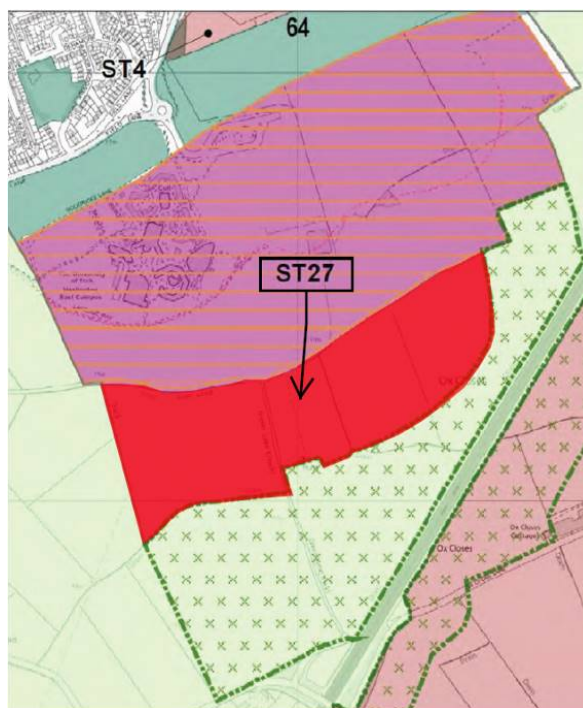
An alternative defensible boundary is proposed along the side of the A64, as the 30ha landscape buffer to the south of the campus extension can be secured via Local Plan policy outside Green Belt.

The University of York proposes a 26Ha site boundary (in line with proposals put forward by CYC in 2014), the evidence to justify this size of site in terms of academic need and economic benefit to the city along with heritage evidence stating the land to the south of Campus East could be developed without harm to the setting and special character of the city were submitted in 2018. A 30ha landscape buffer would be provided as part of the development. This buffer would be within the Green Belt and remain open. On this basis, the whole 26ha would be available for development.

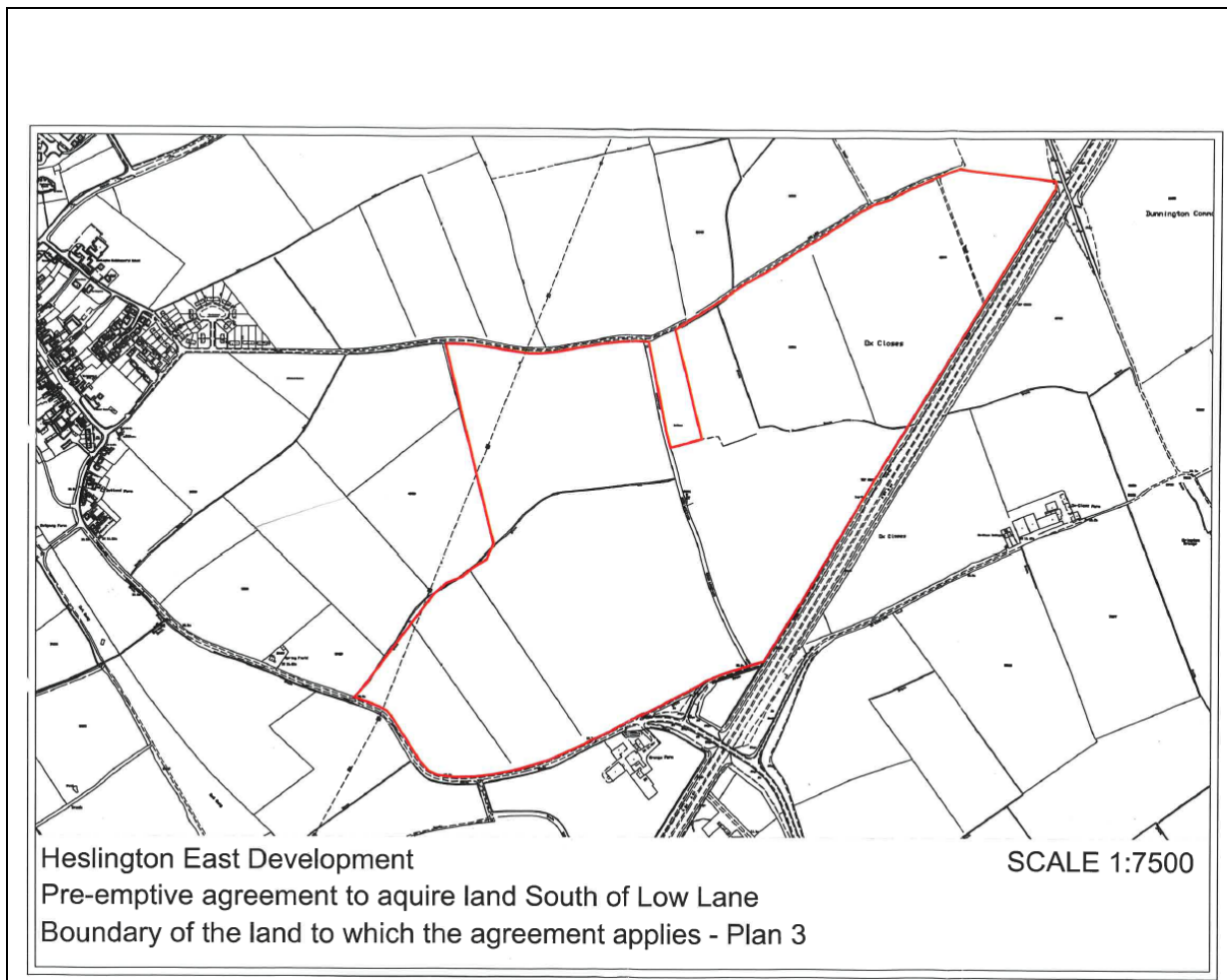
It is also proposed that the plan period needs to be 15 years from adoption +10 years (to 2046). If this were the case further expansion land for the University would need to be considered. And further land within the university ownership is therefore put forward to safeguard for this purpose.

Site Plan showing proposed modifications, where relevant

PMSID 0849 – O'Neill Associates OBO University of York – Site Plans Submitted.



■ University proposed extension area



**Green Belt boundary modification at:
 ST 19 – Land at Northminster Business Park (Employment Allocation)**

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

Councillor Hook argues that the expansion of Northminster Business Park is not an exceptional case and expansion is against the Poppleton Neighbourhood Plan and puts at risk a larger section of the Green Belt between the A1237 and Acomb.

Asks that the Site be removed from table 2 on page 81 of the TP1 Addendum and retained within the Green Belt.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
H39 – North of Church Lane Elvington (Housing Allocation)**

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

A number of responses disagree with the analysis of H39 within TP1, arguing that:

- Exceptional circumstances do not exist in the case of this site,
- They disagree with the evaluation of purposes 1, 3 and 4.
- That the site is important to the key areas of openness identified in the conservation area appraisal,
- Developing the site would change the rural nature of the village and exacerbate traffic concerns on Becksides, as well as impacting on utilities, flooding and wildlife habitats.
- There are no recognisable and permanent features to the western boundary
- An inspector previously determined H39 serves Green Belt purposes.

It is proposed that H39 be removed as an allocation and retained within the green belt.

The former allocated site H26 (Alt site 55), to the North of the village, has been put forward as a supported alternative to this site.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at: (Annex 3) Inner boundary –
SP1 – The Stables Elvington (Travelling Showpeople Site)**

Summary

See also Section 12 which sets out other comments in relation to allocated sites.

A number of responses disagree with the analysis of SP1 arguing that:

- There are no special circumstances to justify removal of this site from the Green Belt.
- Fails to comply with national green belt policy PPG2 and Travellers (policies B,C,D,E & F) and is contrary to government policy
- Site has already been rejected more than once for residential development.
- If the site were to be taken out of the greenbelt this would set a precedent for the neighbouring field and historical properties to also be removed from green belt.
- Council has refused planning applications and imposed significant Greenbelt related restrictions on nearby sites.
- Previous planning inspector's ruling stated that permission was only temporary (10/02082/FUL) and should be abided by.

It is proposed that SP1 be removed as an allocation and retained within the green belt or

Adjacent properties be treated equally and also be removed from the Green Belt.

Site Plan showing proposed modifications, where relevant

No site plan provided.

14.6 Proposed Modifications relating to alternative sites in the general extent of York's Green Belt

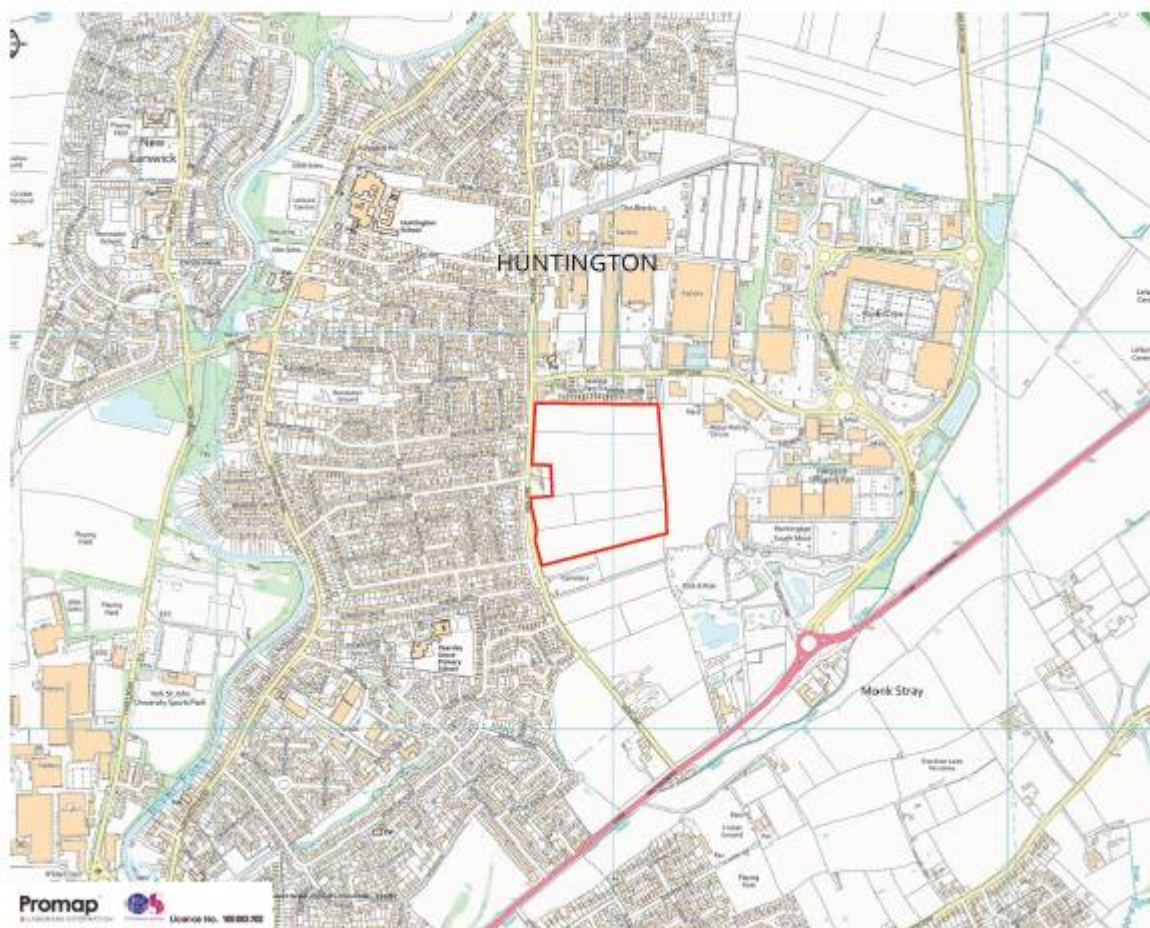
Green Belt boundary modification at: Former ST11 – (Alt Site 155) New Lane, Huntington Summary

PMSID 0339 - Barton Willmore OBO Barratt and David Wilson Homes

Former ST11 - Site at New Lane, Huntington (ST11) should be included in the plan as an allocation for development in order to meet York's true housing need and provide a permanent green belt boundary. If not included as an allocation for development then at a minimum the site should be excluded from the Green Belt, either as white land or allocated as safeguarded land for future development.

Site Plan showing proposed modifications, where relevant

PMSID 0339 - Barton Willmore OBO Barratt and David Wilson Homes – Site Plan Submitted.



NB: The proposed boundary differs from former ST11 proposed by CYC (See alternative sites section for more information).
A modification to the Green Belt boundary in this section would relate to Annex 3 Inner Boundary Section 5 Boundaries 30 and 31.

**Green Belt boundary modification at:
Former ST12 (Alt Sites 213 and 208) - Manor Heath, Copmanthorpe**

Summary

PMSID 0339 Barton Willmore OBO Barratt and David Wilson Homes

The plan should rightly inset Copmanthorpe but not draw a boundary simply around the extremities of the settlement. Should the Council follow its own methodology, the Green belt boundary would exclude land to the west of Copmanthorpe, including our Clients land at Manor Heath, Copmanthorpe (ST12).

PMSID 376 ELG Planning OBO Taylor Wimpey

Further land must be released from the Green Belt to meet the Council's properly calculated housing requirement and ensure that there is sufficient flexibility to ensure the plan is deliverable. The merits of land at ST12 are stated as being a suitable, sustainable location for development, with no physical or environmental constraints which is available now for short term market and affordable housing with a willing landowner and developers with a proven track record.

Site Plan showing proposed modifications, where relevant

PMSID 0339 - Barton Willmore OBO Barratt and David Wilson Homes - Site Plan Submitted:



376 ELG Planning OBO Taylor Wimpey - Site Plan Submitted:



NB The proposed boundaries differ from the Former ST12 proposed by CYC. (See also alternative sites section.)

**Green Belt boundary modification at:
Former ST29 – (new Alt site boundary) Land at Boroughbridge Road**

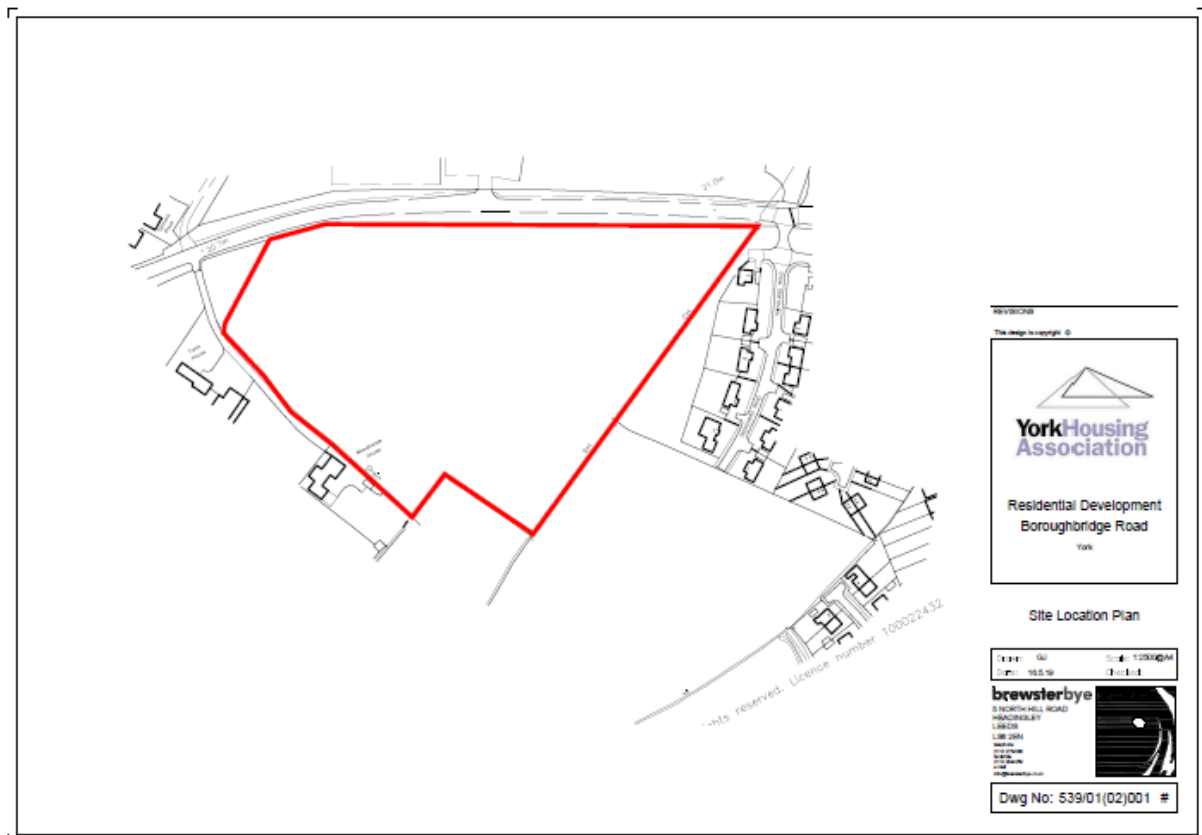
Summary

PMSID 0894 Carter Jonas OBO Karbon Homes

Additional land (such as land at Boroughbridge Road on the urban fringe), should be removed from the Green Belt to allow flexibility. Sites such as the former ST29 make little contribution toward the 5 purposes of Green Belt at NPPF paragraph 134 (a-e) and should therefore be allocated or safeguarded for housing rather than designated as Green Belt to avoid conflict with paragraph 139 of the NPPF.

Site Plan showing proposed modifications, where relevant

PMSID 0894 – Carter Jonas OBO Karbon Homes - Site Plan Submitted:



NB The proposed boundaries differ from the Former ST29 proposed by CYC. (See also alternative sites section).

A modification to the Green Belt boundary in this section would relate to Annex 3 Inner Boundary Section 2 Boundaries 9 and 10.

**Green Belt boundary modification at:
York H2a (Alt Site 33) Racecourse Stables**

Summary

PMSID 0122 Turnberry OBO York Racecourse

As part of green belt boundary relaxation and review of the race course estate the current horse stables could be relocated and the site to the west of Knavesmire. The current stables could be used as a brownfield site for housing. This site was previously submitted during 2015 call for sites but not taken forward.

PMSID 0091 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

From the Officer's Report LPWG 23.01.18 the respondent wishes to have H2a (33) reinstated for the revised potential revised figure (and boundary)

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Former H2b – (Alt Site 132) – Land at Cherry Lane**

Summary

PMSID 0587 O'Neill Associates (Eamonn Keogh) OBO Shepherd Homes

The site south of Cherry Lane is in a highly sustainable location for housing and Shepherd Homes can confirm is available for development in the first 5 years of the plan period. Detailed information included in appendix. Allocation would help meet York's true housing need, guarantee permanent green belt boundaries and ensure a sound plan.

PMSID 0091 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

From the Officer's Report LPWG 23.01.18 the respondent wishes to have H2b (132) reinstated for the revised potential revised figure (and boundary)

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Former H26 - Land off Dauby Lane, Elvington**

Summary

PMSID 0867 - DPP OBO Yorvik Homes

Re-instate site H26 to help meet true housing need. Oppose deletion of this site, has previously been found suitable for development.

A number of Elvington residents also submitted representations in favour of seeing H26 developed in preference to H39.

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Former H27 - Alt Site 49 - The Brecks, Strensall**

Summary

PMSID 0607 - Lichfields OBO Taylor Wimpey Ltd

The Brecks, Strensall - Define the boundary of the Green Belt around Strensall such that land at Brecks Lane is excluded from the Green Belt and allocated for residential development on the Local Plan Proposals Map.

Site Plan showing proposed modifications, where relevant

PMSID 607 Lichfields OBO Taylor Wimpey Ltd – Alternative proposed boundary (including woodland) as below:



NB: The CYC Proposed Boundary for former H27 (Alt Site 49) can be viewed in section 13

**Green Belt boundary modification at:
Former H28 - Land North of North Lane, Wheldrake**

Summary

PMSID 0866 - DPP OBO Mulgrave Properties

Re-instate site H28 to help meet true housing need.

PMSID 0091 - Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

From the Officer's Report LPWG 23.01.18 H28 should be reinstated for the revised potential revised figure (and boundary)

2 people stated that:

In appendix J of the 2005 Plan, land at H28 is designated as housing and not part of the Green Belt. The evidence base Y/PPT/2/5/192 from the York Green Belt Archives shows how these boundaries were drawn up by a Planning Inspector on the back of a public inquiry.

Others also suggested the inclusion of sustainable sites such as H28 Wheldrake

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Former H33 - Land at Church Balk Dunnington**

Summary

PMSID 0592 – O’Neill Associates OBO Yorvik Homes

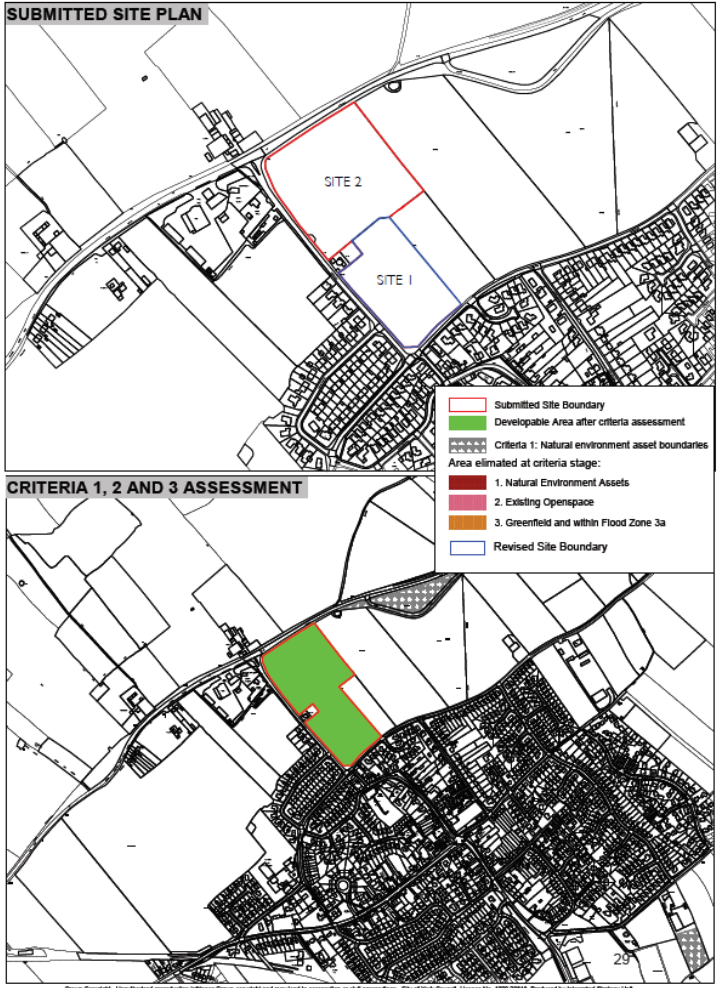
The allocation of the site would assist in meeting an identified requirement for sustainable development, and enable the Council to define Green Belt boundaries that will endure beyond the Plan period.

The site does not perform an important role in preventing neighbouring town merging into one another.

The allocation of land to the east of Church Balk will establish a consistent boundary at the northern edge of the village and have no adverse impacts in relation to the need to preserve the setting and special historic character of York or Dunnington. As it would not impact on the York Moraine or historic setting of the village.

Site Plan showing proposed modifications, where relevant

PMSID 0866 - DPP OBO Mulgrave Properties – Site plan Provided



NB Site 1 represents that previously allocated by CYC as former H33

**Green Belt boundary modification at:
Former H37 - Land adjacent to Greystone Court, Haxby**

Summary

PMSID 0091 – Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

Request H37 be removed from the Green Belt and reinstated as allocated housing site or safeguarded land for future growth within the Green Belt. H37 does not have a harmful impact on the historic setting of York and coalescence; nature conservation; open space; green infrastructure corridors or strategic areas to keep permanently open and the site is sustainable. It is illogical and unsound to include this site as part of the Green Belt. The creation of a sizeable dedicated Open Space/Woodland in perpetuity would ensure a defensible, permanent Green Belt boundary to safeguard against future coalescence.

Site Plan showing proposed modifications, where relevant

PMSID 0091 – Strathmore Estates OBO Westfield Lodge and Yaldara Ltd



NB: The CYC proposed boundary for Former H37 (Site 6 – 3.56Ha) is included for information in Section 13. The received representation sets out a developable area of 1.95 ha only with the remainder of the site proposed to be laid out as public open space area to remain permanently within the green belt.

**Green Belt boundary modification at:
Former H50 (Alt Site 1003) - Land at Malton Road**

Summary

PMSID 0895 Carter Jonas PBO Banks Property Ltd

Suggest that more land needs to be released from the York Green Belt to meet an increased OAN. The site is argued to not make any realistic contribution to the five purposes as set out in NPPF as:

- It is within a heavily urbanised setting and therefore would not contribute to urban sprawl
- The site does not contribute to the setting or special character of York.
- Robust boundaries along Malton Rd and New Lane would form new defensible boundaries which would be stronger than existing back gardens and therefore safeguard the countryside from encroachment.
- It plays no role in preventing the coalescence of Heworth, Clifton and Huntington as this is performed by Monk Stray
- The site features a previously developed land known as Barfield Industrial Estate and therefore is an opportunity to recycle derelict and other urban land.
- The site is in a sustainable location within 400m of bus routes and with access to the city centre.

Reports on the Green Wedge and Green Belt assessments, along with Landscape and Visual Assessment have been carried out by Rural Solutions and submitted as part of this representation. Objection is made as the modifications do not include the site's removal or a justification for why the site should not be allocated.

Site Plan showing proposed modifications, where relevant



Figure 4: Suggested Alternative Boundary for Green Belt outlined in red



Figure 3: Concept Masterplan showing up to 120 dwellings

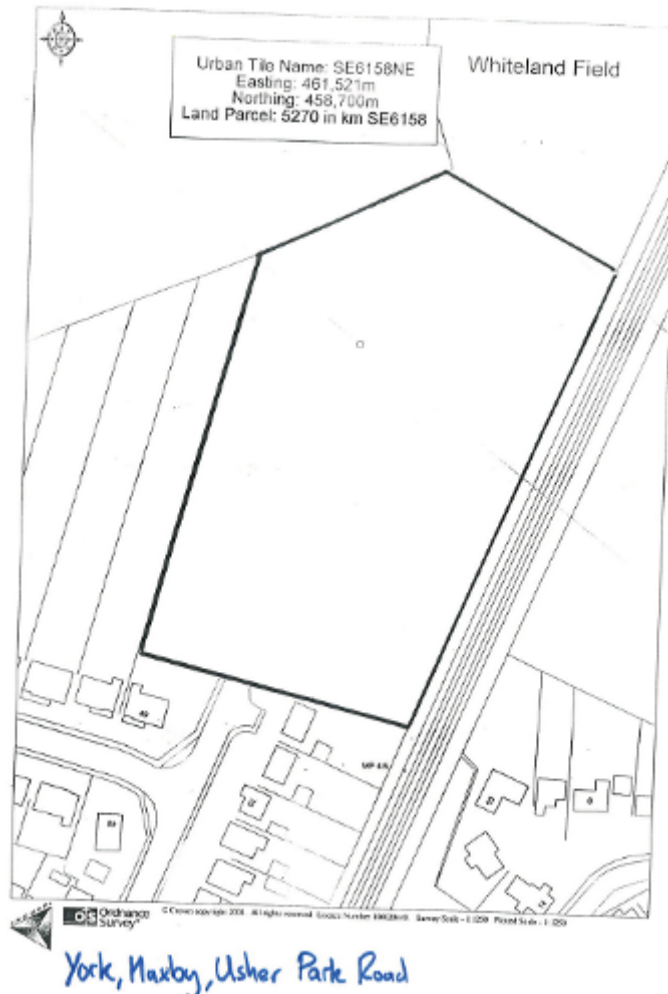
**Green Belt boundary modification at:
Former H54 (Alt Site 179) -Whiteland Field, Usher Park Road**

Summary

PMSID 0125-1 Persimmon Homes

Suggest that the site should be removed from the green belt and included as an allocation for development to contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
Former SF1 - Alt Site Ref 825 - Land to the South of Strensall -**

Summary

PMSID 0260 Pegasus Group OBO Lovel Developments Ltd

In the 2014 Preferred Options Document land to the south of the railway line was allocated as safeguarded land. This land is approximately 29ha enclosed on three sides meaning that the Green Belt could be easily re-defined by using the physical features that a readily recognisable and likely to be permanent.

The Land is still available and should not be ruled out for exclusion from the Green Belt and has been previously thought appropriate for Green Belt release.

Site Plan showing proposed modifications, where relevant



Figure 1: Site Location Plan

NB This representation also references the parcel of land to the north of the railway line (**Alt site 322**) to be considered in combination with this site or in its own right.

**Green Belt boundary modification at:
Former SF5 - Alt Site Ref 768 – West of Moor Lane, Copmanthorpe -
Summary**

PMSID 0220 O’Neill Associates OBO M Ibbotson

Former SF5 - Land at Moor lane, Copmanthorpe is put forward for exclusion from the Green Belt. Green Belt boundaries around York are being established for the first time (no exceptional circumstances necessary), and must meet the identified requirement for sustainable development. This requires more land be excluded.

It is not a question of what land should be taken out of the Green Belt but what land should not be included in. The 5 purposes of Green Belt for the site are assessed as: Helping to check unrestricted sprawl and protect the countryside from encroachment by assisting in meeting an identified requirement for development and thereby establishing Green Belt boundaries that endure beyond the plan period.

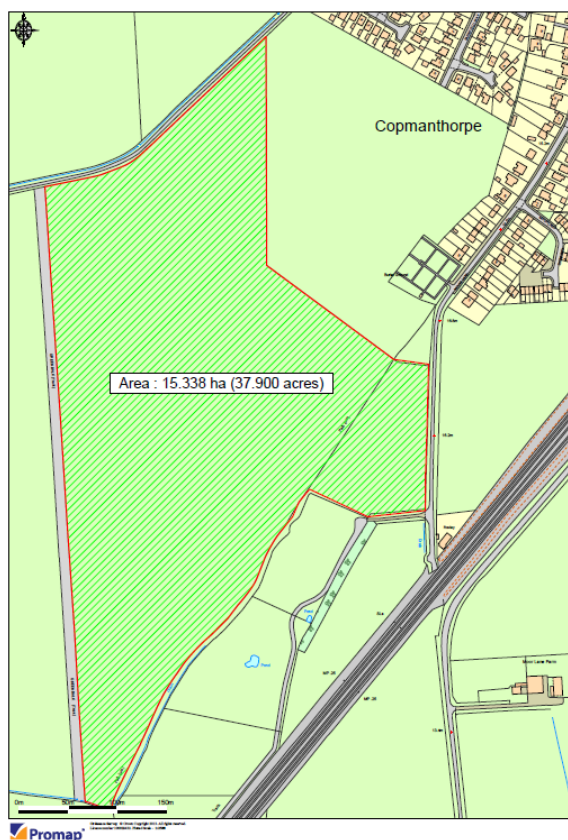
The site is stated not perform an important role in preventing neighbouring towns merging.

The site is stated to have no adverse impacts in relation to the need to preserve the setting and special historic character of York.

As an extension to Copmanthorpe village the site would minimise harm to York's historic Character (in line with the council's spatial strategy).

Sites to the west of Copmanthorpe (such as this) are proposed to cause less harm than ST31 which received objections from historic England in earlier consultations and to be more sustainable options for expansion when compared to ST15.

Site Plan showing proposed modifications, where relevant



NB This representation also references the parcel could be brought forward in combination with other adjacent sites to form a logical expansion to the village of copmanthorpe or in its own right.

**Green Belt boundary modification at:
Former SF10 - Land at Riverside Gardens, Elvington -**

Summary

PMSID 0091 - Strathmore Estates OBO Westfield Lodge and Valdara Ltd

From the Officer's Report LPWG 23.01.18 the respondent wishes to have SF10 (874) reinstated for the revised potential revised figure (and boundary)

Site Plan showing proposed modifications, where relevant

No site plan provided

**Green Belt boundary modification at:
Former SF12 - Land off Moor Lane**

Summary

PMSID 0581 - Avison Young OBO Barwood Strategic Land II LLP

Former SF12 - Barwood's site Land south of Moor Lane should be included in the plan as an allocation for development in order to ensure a sound plan that meets York's true housing need and produces green belt boundaries that are permanent.

PMSID 125 - Persimmon Homes

Object to the removal of Former SF12, Moor Lane. The site does not meet any of the five purposes of Green Belt designation, allocation for development would make a rational green belt boundary and produce a deliverable site that can contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

PMSID 0581 - Avison Young OBO Barwood Strategic Land II LLP

No site plan provided

PMSID 0125 Persimmon Homes



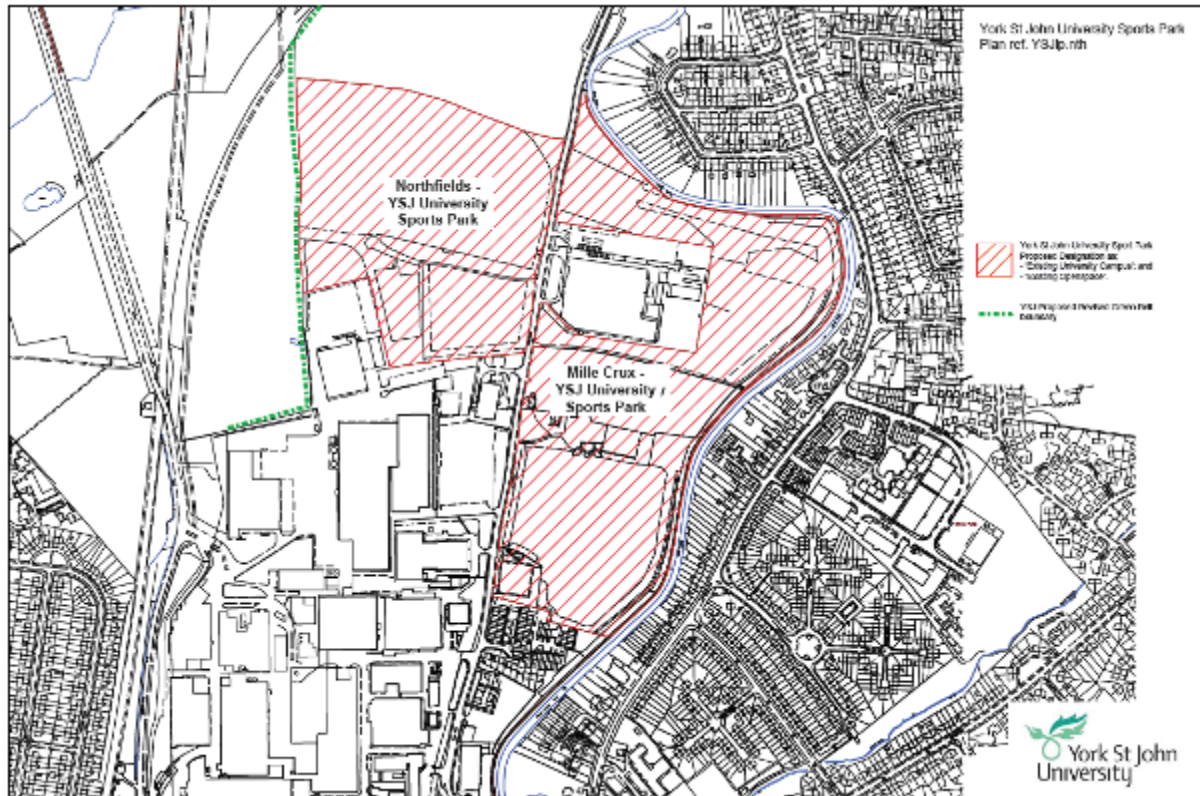
**Green Belt boundary modification at: (Annex 3) Inner boundary
Alt Site 141 - Northfields Sports Park**

Summary

PMSID 0901 - O'Neill Associates OBO York St John University

Remove the Northfields site (alt 141) from the green belt, it should be designated for sports use.

Site Plan showing proposed modifications, where relevant

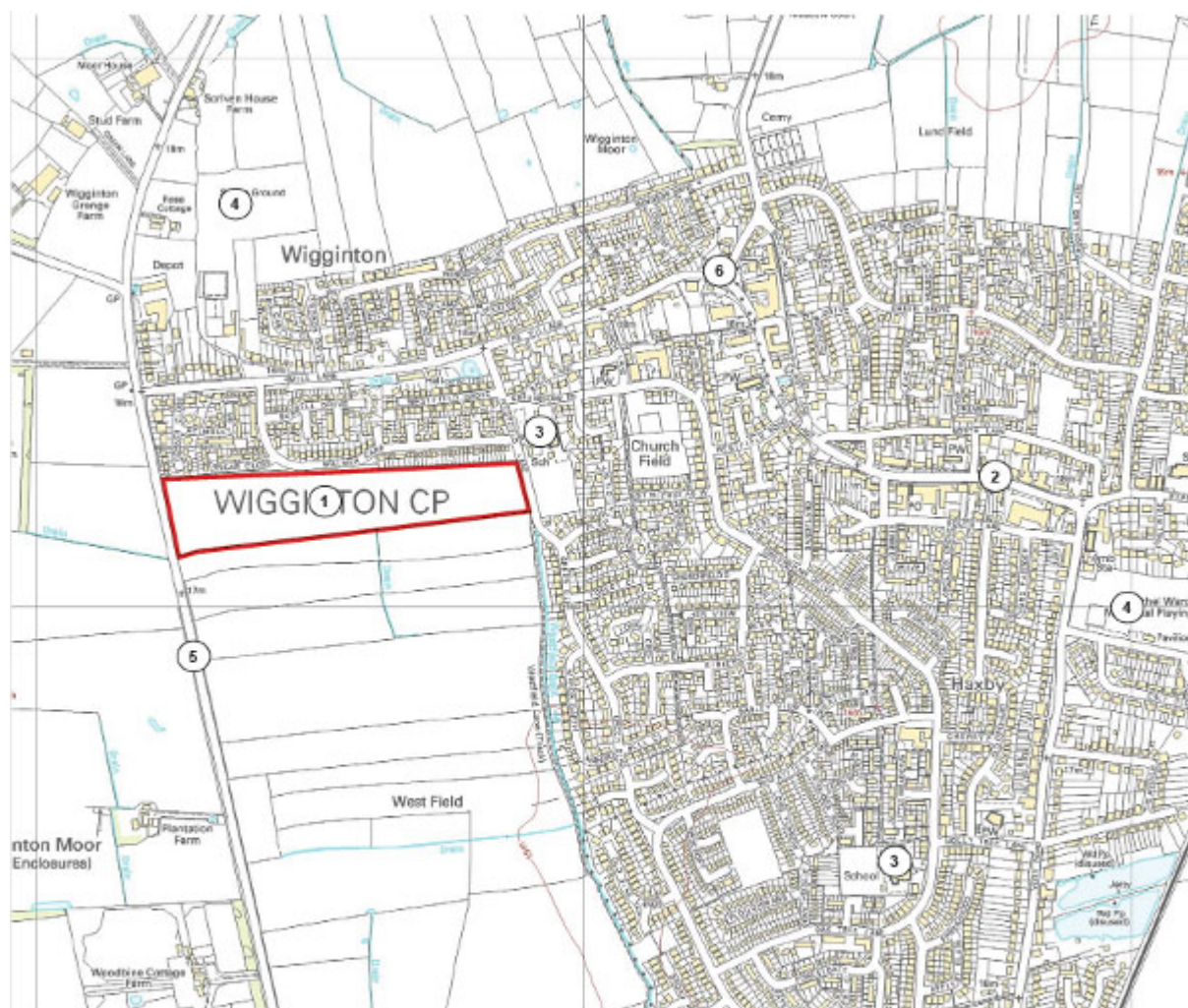


**Green Belt boundary modification at:
Alt Site 165 - Land off Westfield Lane, Wigginton -
Summary**

PMSID 0125 Persimmon Homes

Remove alt site reference 165, Land off Westfield Lane, Wigginton from the green belt and include as an allocation for development. Able to deliver 230 dwellings and contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant



LOCATION PLAN

**Green Belt boundary modification at:
Alt Site 170 - Land off Windmill Lane**

Summary

PMSID 0125 Persimmon Homes

Remove alt site reference 170, Land off Windmill Lane, York (Pond Field) from the green belt and include as an allocation for development. Able to deliver 140 dwellings and contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant

Site Location



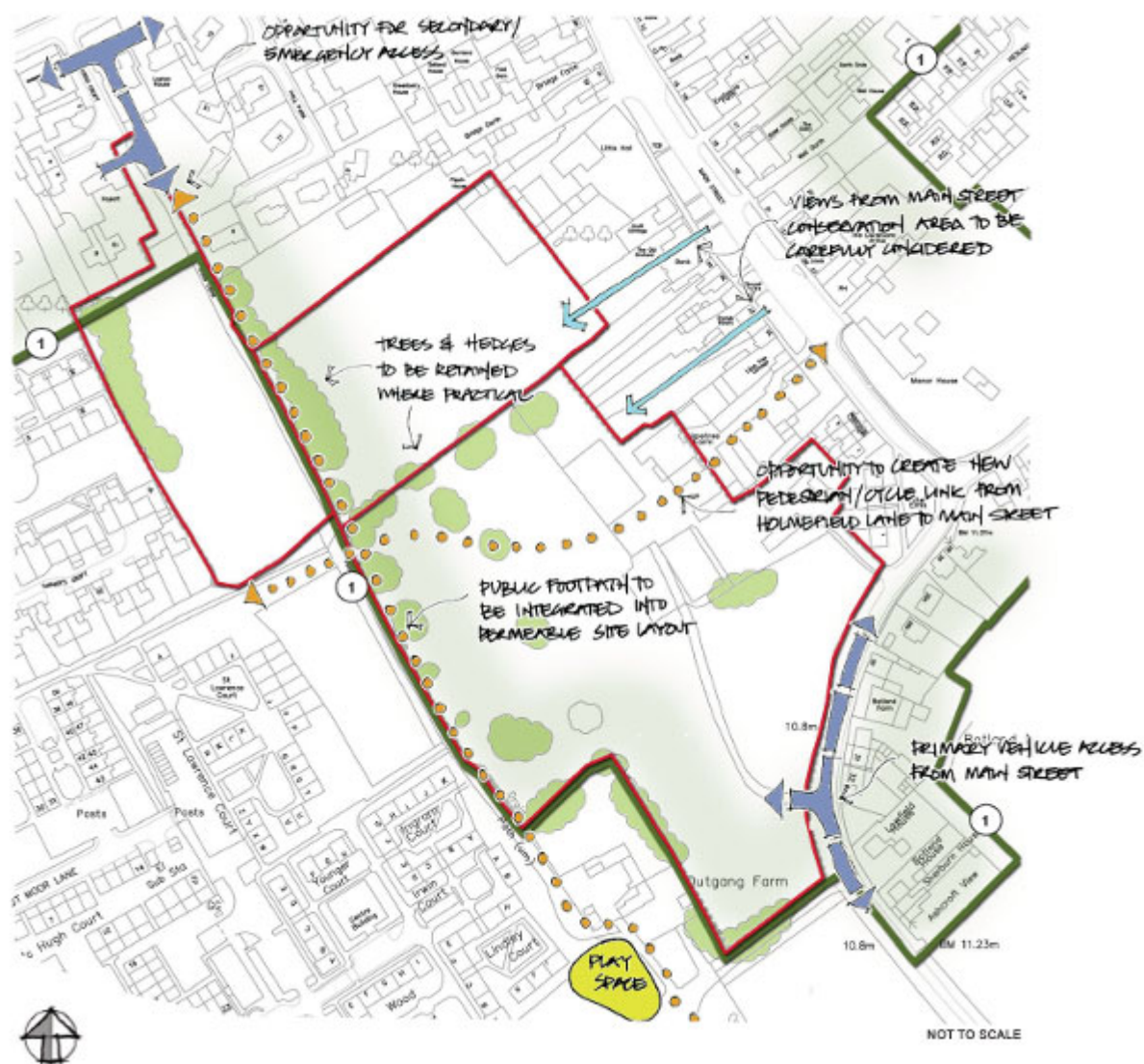
**Green Belt boundary modification at:
Alt Site 171 Common Lane, Lime Tree Farm**

Summary

PMSID 0125-2 Persimmon Homes

Remove alt site reference 171, Common Lane, Lime Tree Farm from the green belt and include as an allocation for development. Able to deliver 150 dwellings and contribute to meeting York's true housing need.

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
Alt Site 191 - Land at Avon Drive**

Summary

The inclusion of sustainable sites such as land to the north of Avon Drive is suggested.

Site Plan showing proposed modifications, where relevant

No site plan provided

Site 221 – Agricultural Land, Sim Balk lane

Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated.

Site Plan showing proposed modifications, where relevant

No site plan provided

NB The representation refers to sites submitted by Gateway Developments – it has been assumed this refers to submissions to previous stages of consultation and sites 221 to 224 have been identified – See Section 13 for CYC considered boundaries

Site 222 – Agricultural Land, Sim Balk lane

Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated.

Site Plan showing proposed modifications, where relevant

No site plan provided

NB The representation refers to sites submitted by Gateway Developments – it has been assumed this refers to submissions to previous stages of consultation and sites 221 to 224 have been identified – See Section 13 for CYC considered boundaries

Site 223 – Agricultural Land, Copmanthorpe Lane, Bishopthorpe

Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated

Site Plan showing proposed modifications, where relevant

No site plan provided

NB The representation refers to sites submitted by Gateway Developments – it has been assumed this refers to submissions to previous stages of consultation and sites 221 to 224 have been identified – See Section 13 for CYC considered boundaries

Site 224 – Agricultural Land, Church Lane, Bishopthorpe

Summary

PMSID 181 Gateley Legal OBO Gateway Developments (York) Limited

We do not accept the approach taken in the Greenbelt Topic Paper to the greenbelt in respect of these sites is valid. Do not accept that the greenbelt protects the special character and setting of York or protects the countryside function. The land is clearly part of the urban area that has an urbanised character and does not have any adverse effect upon the purposes of including land in the greenbelt. The overwhelming need for deliverable housing sites in early years combined with the lack of greenbelt and other harm arising from the development of this site means that the exceptional circumstances required to remove it from the general ambit of greenbelt are demonstrated

Site Plan showing proposed modifications, where relevant

No site plan provided

NB The representation refers to sites submitted by Gateway Developments – it has been assumed this refers to submissions to previous stages of consultation and sites 221 to 224 have been identified - See Section 13 for CYC considered boundaries

**Green Belt boundary modification at:
Alt Site 322 – Amalgamated Sites South of Strensall**

Summary

PMSID 0260 Pegasus Group OBO Level Developments Ltd

The northern parcel represents an area of land which is well connected to the existing settlement and has clearly defined boundaries by virtue of existing residential development and the railway line to the south. The site can therefore be released from the Green Belt without causing harm to the openness of the Green Belt and resulting in unrestricted urban sprawl. Allocation for development would help meet York's true housing need. The site is proposed either in conjunction with SF1 or in isolation.

Site Plan showing proposed modifications, where relevant



Figure 2: Northern Parcel

**Green Belt boundary modification at:
Alt Sit 629, 861 & 862 - Land at The Retreat, Heslington Road**

Summary

PMSID 0603 - Savills (UK) Ltd OBO Retreat Living Ltd.,

The land at 'The Retreat' represents an opportunity to deliver growth, within a poorly performing Green Belt location and therefore it is argued should be released from this designation. The site is stated to not have characteristics of openness due to its built form and walled grounds, sitting in an area of distinctly different character. It is agreed that 'The Retreat' is important to the historic nature and character of York and should therefore be protected, but not that this is justified by the proposed green belt designation and could be managed through the development management process. The site has proximity to services and strong physical boundaries which are stated to check unrestricted sprawl. Coalescence is prevented by the existing Walmgate stray. The retreat grounds themselves are stated to be dominated by built structures with no through route to the stray and beyond thereby protecting the countryside from encroachment.

PMSID 0916 Carter Jonas OBO Schoen Clinic Ltd/The Retreat Living

It is proposed that the rear wall to the Retreat grounds would form a boundary to the Green Belt as it marks the border between the publically accessible Walmgate Stray and the closed off private grounds of the retreat with the wall providing a recognisable and permanent physical feature.

In addition Plot 2a (part of Alt site 892) is proposed as an allocation for development in order to meet York's true housing need. It is stated that this parcel of land has different characteristics from the wider retreat site as it is bounded on 4 sides by built development, not permanently open or performing any of the five purposes of Green Belt. It is proposed that excluding only the northern built up part of the retreat would be a suitable alternative boundary in the event that option 1 is discounted.

Site Plan showing proposed modifications, where relevant

PMSID 0603 - Savills (UK) Ltd OBO Retreat Living Ltd,



Figure 1 - Site Location Plan

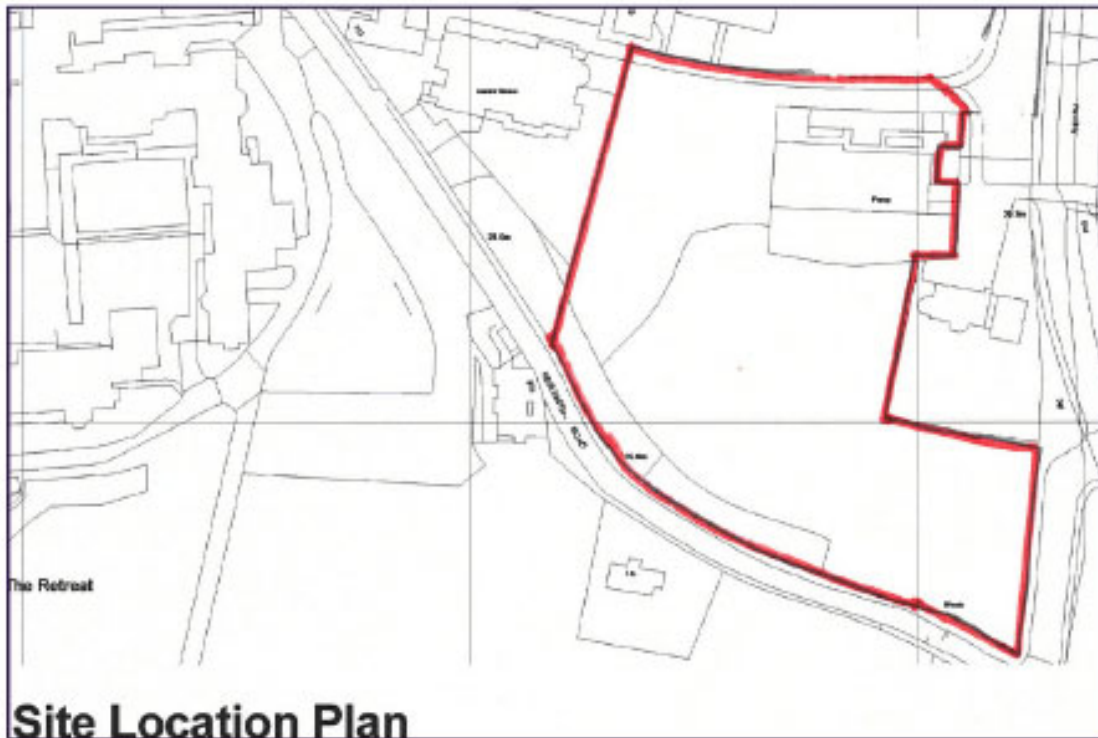
PMSID 0916 Carter Jonas OBO Schoen Clinic York Ltd / The Retreat Living Option1:

APPENDIX 2



NB the pink line on the plan above is proposed as an alternative boundary

Area proposed for development:



Site 737 – Stock Hill Field, West of Church Balk, Dunnington

Summary

PMSID 890 Johnson Mowatt OBO Yorvik Homes

There is a need for more allocations and safeguarded land to give the Local Plan longevity and support the new Green Belt boundaries for a period of 20 years. The representation is in support of Stock Hill Field, West of Church Balk, Dunnington which is stated to be available for development immediately.

Site Plan showing proposed modifications, where relevant

PMSID 890 Johnson Mowatt OBO Yorvik Homes – Site plan submission
confirmed boundary of site 737



**Green Belt boundary modification at:
Alt Site 787 - Stockton Lane -**

Summary

PMSID 0125 Persimmon Homes

Remove alt site 787, Stockton Lane (formerly part of ST7) from the green belt and include as an allocation for development. The site does not meet any of the five purposes of Green Belt designation, allocation for development would make a rational green belt boundary and produce a deliverable site.

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
Land at North Field - Alt Site Ref 871 -
Summary**

PMSID 0604 Carter Jonas OBO L & Q Estates

Re-instate alt site 871 for development to help meet the true housing need. At the very least include the site as safeguarded land.

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
 Alt Site Ref 873 - Land to the East of the Designer Outlet
 Summary**

PMSID 0141 Avison Young OBO Oakgate

Assess Naburn Business Park site as a reasonable opportunities. It is not appropriate that only proposed allocations sites have been considered to be removed from the Green Belt

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
Alt Site Ref 942 - Land at Chapel Fields**

Summary

PMSID 0182 Johnson Mowatt OBO KCS Development

Alt Site 942 - for housing in order to meet York's true housing need. This will ensure a five year land supply and that Green Belt boundaries retain permanence.

Site Plan showing proposed modifications, where relevant



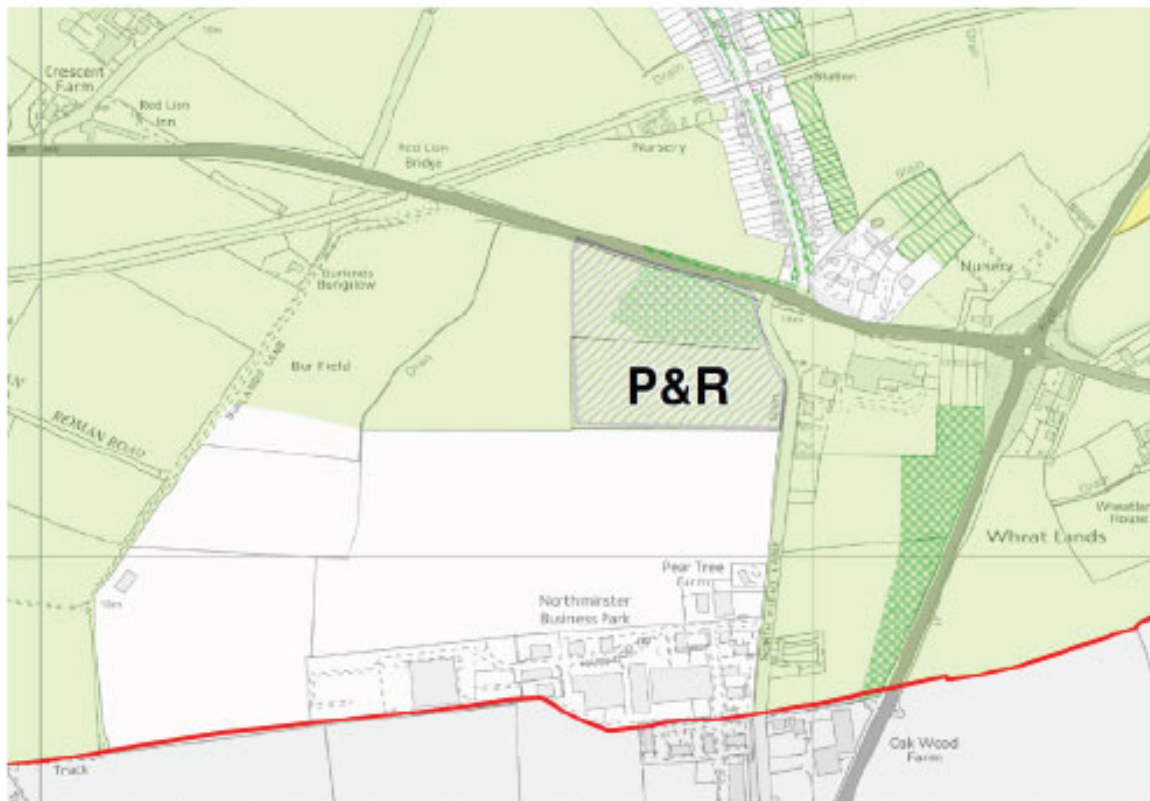
**Green Belt boundary modification at:
Alt Site 952 - Land south of Poppleton Park & Ride**

Summary

PMSID 0354-1 - Peter Vernon and Co.

Given that the land to the south of Poppleton Park & Ride is now allocated as 'White Land' (without any designation), the land (alt site 952) should properly be considered as a housing allocation given the objectively assessed need for housing.

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
Alt Site 957 - Land at Malton Road Industrial Estate**

Summary

PMSID 0589- O'Neill Associates (Eamonn Keogh) OBO Malton Road

Developments Ltd

14.66 hectares at the Business Park put forward for employment. Should the Inspector conclude the site is not required at the present time, the undeveloped 10.66 hectares to the north of the business park should be designated as safeguarded land in the Local Plan.

Site Plan showing proposed modifications, where relevant

No site plan provided

Green Belt boundary modification at: Alt Site 964 - Land NE of Huntington

Summary

PMSID 0376 ELG Planning OBO Taylor Wimpey

Consider that further land should be released from the Green Belt to meet the Council's properly calculated housing requirement and also ensure that there is sufficient flexibility to ensure that the plan is deliverable.

PMSID 0091 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

The respondent wishes to have site 964 from the officers report LPWG 23.01.18 reinstated for development.

PMSID 0620 O'Neill Associates OBO Galtres Garden Village Development

Group

Green Belt boundaries are not defensible because insufficient land has been excluded to meet development needs during and beyond the 16-year Plan period. Removal of this site from the Green Belt will enable the Council to define boundaries that will endure beyond the plan period and therefore check the unrestricted sprawl of the larger urban area. The site does not meet any of the five purposes of Green Belt designation and fits comfortably with the Council's spatial strategy of prioritising development within and /or as an extension to the urban area and through the provision of new settlements in order to minimise harm to York's historic character.

Site Plan showing proposed modifications, where relevant

PMSID 0091 Strathmore Estates OBO Westfield Lodge and Yaldara Ltd

No site plan provided

PMSID 0620 O'Neill Associates OBO Galtres Garden Village Development

Group



NB: The above site plan correlates to CYC considered alternative boundary 964.

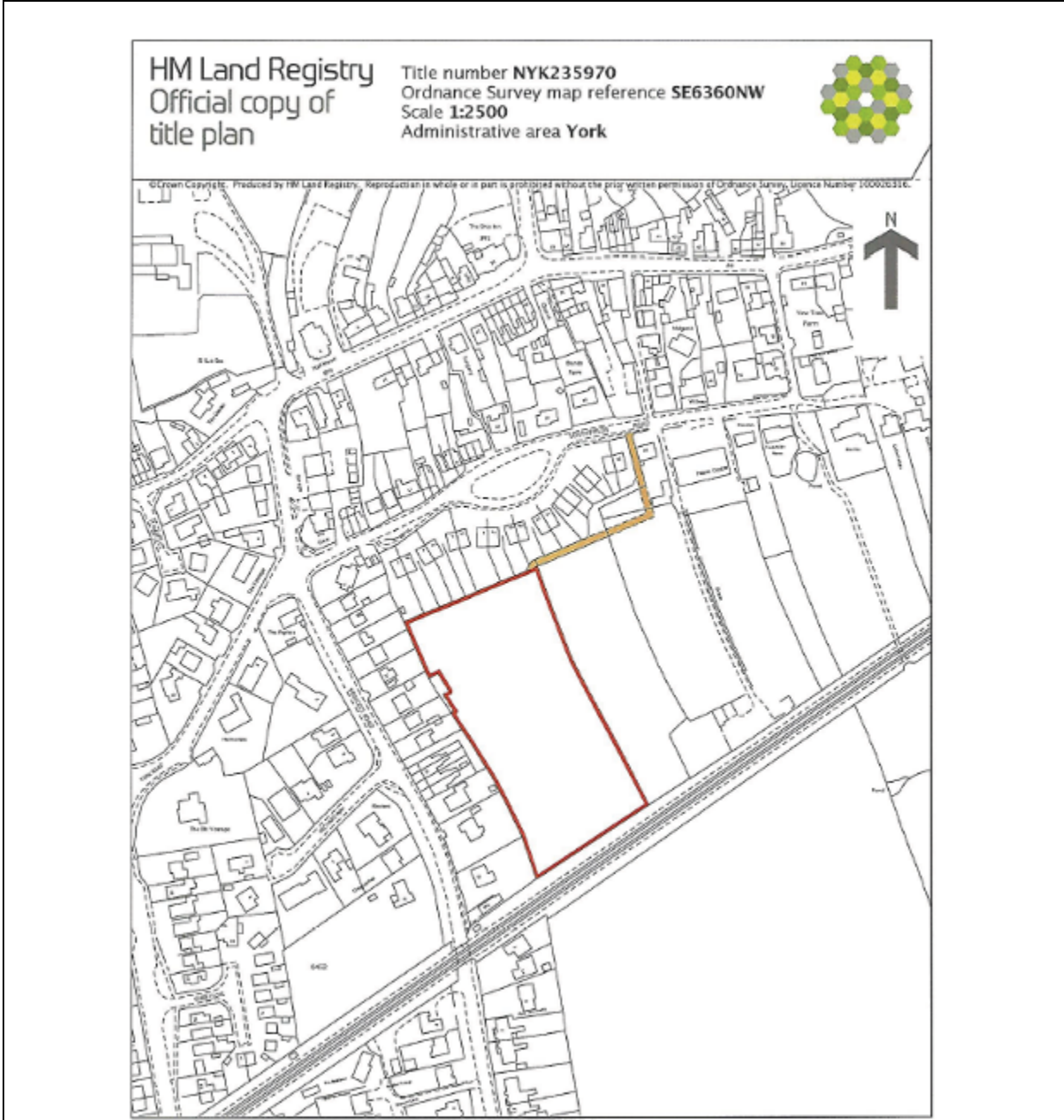
**Green Belt boundary modification at:
Alt Site 970 - Land at Princess Road, Strensall**

Summary

PMSID 0210 Lichfields OBO of Wakeford Properties

Exclude land at Princess Road, Strensall, from the Green Belt and either allocate as residential development or safeguarded land on the Local Plan Proposal Map

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
Alt Site 971 - Land off Southfields Road, Strensall**

Summary

PMSID 0210 Lichfields OBO of Wakeford Properties

Exclude land at Southfields Road, Strensall, from the Green Belt and either allocate as residential development or safeguarded land on the Local Plan Proposal Map.

Site Plan showing proposed modifications, where relevant



**Green Belt boundary modification at:
Alt Site 982 - York Racecourse Green Houses-**

Summary

PMSID 0122 Turnberry OBO York Racecourse

As part of green belt boundary relaxation and review of the race course estate the current green houses could be relocated and site near Middlethorpe village used as a brownfield site for housing.

Site Plan showing proposed modifications, where relevant

No site Plan Provided

**Green Belt boundary modification at:
'Racecourse and Terry's Factory Conservation Area**

Summary

PMSID 0869-2

Respondent recommends that the 'Racecourse and Terry's Factory Conservation Area' be included within the Green Belt as this will help preserve and enhance the area as required by the Planning Act 1990 and as required by the NPPF.

Site Plan showing proposed modifications, where relevant

No site plan provided

NB Previously submitted boundary can be viewed in section 13.

15. General Comments

General Issues Raised

This provides a brief summary of issues raised during consultation which, while they do not relate directly to Proposed Modifications consultation, have relevance to the wider Plan-making process.

Legal Compliance

In relation to the Plan's general Legal Compliance:

- **Michael Hargreaves Planning OBO York Travellers Trust** note that the Plan underestimates needs for Gypsies and Travellers and is therefore not legally compliant with 2010 Equality Act.. Also does not allocate sites out of the Green Belt so not compliant with Public Sector Equality.
- **Karbon Homes / Banks Property Ltd.** - not legally compliant as it has not been carried out in accordance with the legal requirements of the Sustainability Appraisal and other statutory requirements.

In relation to Duty to Co-operate (see also DTC summary):

- **Turberry OBO York Racecourse** note that a Statement of Community Involvement report has not been produced for regulation 19 publication of draft local plan.
- **O'Neill Associates OBO Private Landowners** – Outcomes have not addressed some significant concerns of neighbouring Authorities and is difficult to see how the Duty to Co-operate has been complied with.
- **Shepherd Homes / Malton Road Developments / Galtres Garden Village Development Group** – Whilst the Council may have engaged in a process of dialogue with neighbouring authorities, it has not produced outcomes that have addressed some significant concerns of neighbouring authorities. Indeed, at this stage the views of some adjoining Authorities are not known and It is difficult to see how, in these Circumstances, the Duty to Co-Operate has been complied with.
- **York and North Yorkshire Chamber of Commerce** – CYC has not produced outcomes that have addressed some concerns of neighbouring authorities and therefore it is difficult to see how the duty to co-operate has been complied with.
- **Galtres Garden Village Development Group** - Neighbouring planning authorities have not had the opportunity to comment on the proposed reduced housing provision for the York Council area and our previous concerns outlined in the our 2018 representations have not been addressed.
- A number of residents local to Elvington make the same comment; that the process of consultation has been "consult & ignore". Believes CYC and local politics has no desire to comply with national policy and evidence. Believes that Council wishes to expedite the adoption of the Local Plan to then exercise discretionary choice of green belt development through strategic sites.

In relation to conformity with NPPF

- Does not reflect the Yorkshire & Humberside RSS Revocation order. Does not comply with either the 2012 or 2019 NPPF where it proposes development

that is not limited infilling in villages.

Soundness

Respondents commenting on the general soundness of the Plan:

Those who consider the Plan to be generally sound:

A number of respondents including **Strensall & Towthorpe Parish Council, Copmanthorpe Parish Council, Gladman Developments, West Yorkshire Combined Authority / Leeds City Region LEP** consider the Plan to be generally sound

The respondents who consider the plan generally unsound offer the following comments:

General

- Amongst a number of other respondents, **Elvington Parish Council** feel that the Plan does not reflect local public need or opinion, and should be rejected by the Inspectors, offering the following concerns: proposed modifications claimed as minor by the council will have profound implications for Elvington; the Parish Council has never been consulted about what the village needs; Elvington should remain within the green belt as it is a rural village with limited amenities with open spaces and wildlife.
- Heslington has shouldered a significant amount of development in recent years. Further development will convert Heslington into a suburbia.
- Development of arable land will impact farmers, reduce local food production and affect England's self-sufficiency if outside of the European single market.

Housing and Employment Matters

- Amongst others, **Rachael Maskell MP** notes that the Plan does not provide adequate affordable homes/social housing.
- **York Travellers Trust** note that the Green Belt boundary is highly unlikely to 'promote sustainable patterns of development', and that the failure to identify sites for existing and future needs is a consequence of the problems with Policy H5. It considers that the Plan's policies will not meet the needs of York's long established Gypsy community.
- **York and North Yorkshire Chamber of Commerce Property Forum** believe that the current draft local plan lacks the ambition necessary to support the proposed growth (in employment and housing terms including affordable housing).
- A number of response support an alternative development strategy which provides a range of small and medium sites alongside other larger strategic sites in order to encourage choice and churn.. Is not providing 20% buffer of sites to meet historic demand.
- **Oakgate** considers the lack of choice in meeting employment need, and over-reliance on York Central, renders the Plan unsound.
- A number of respondents feel that removing The Stables (SP1 – site for Travelling Showpeople) from the green belt is inappropriate, in the context of previous Inspector's approval of temporary planning consent only.
- **York Labour Group /York Labour Party / Rachel Maskell MP** - As there are

insufficient land allocations to employment uses of all kinds, an adjustment to one site should not be made without reference to the whole of employment sites.

- **York Labour Group /York Labour Party / Rachel Maskell MP** – Local plan is silent on employment needs of city.

Sustainable development

- **Westfield Lodge and Yaldara Ltd-** Plan is not consistent with national policy that aims for 'the delivery of sustainable development in accordance with the framework'.
- **York Labour Party / York Labour Group / Rachel Maskell MP** consider that the Plan fails to address or deliver; opportunity or prosperity for all, implications of sustainability in light of employment and housing, and transportation problems existing and future.
- **Rachael Maskell MP** - Old data was used in the development of the local plan and do not sustain the objective to create a Carbon Neutral City.

Safeguarded Land/GB permanence

- A significant number of responses query the lack of identified safeguarded land, suggesting that such land should be included in order to make the Plan sound, and provide a 'permanent' green belt boundary. Reference is made to previous Counsel advice on the duration of a 'permanent' green belt being ignored.

Modifications

Proposed modifications include:

Local Plan policies

- **Retreat Living Ltd** – CYC to reword their vision to be in line with Regulation 19 Publication in the spirit of effective, sound and justified plan making.
- Allocate more affordable homes
- **York Travellers Trust**– H5 Policy wording should make explicit the requirement for Gypsy and Traveller site delivery. GB4 Policy wording should be amended to include Gypsy and Traveller sites and pitches.
- Revise H2 policy wording regarding net densities
- **Oakgate Group Ltd.** – Make Policy H10 revert to that set out in Pre-Publication Draft (2017) and is consistent with National Policy.
- **Oakgate Group Ltd.** – Vacant building credit section should remove any reference to incentivising as a qualifying factor and outline that the conversion of existing floor space will be eligible for a net reduction in affordable housing.
- **Oakgate Group Ltd.** Employment allocations should identify a mix of sites to reflect the needs of different markets and occupiers.

Spatial Development Strategy

- Brown field sites should be considered first. All potential sites with better transport links should be used first. Use brown field sites in an around York to attract businesses.
- ***Cumulative impact of development on the City's transport network and amenities should be established.***

Safeguarded Land/GB permanence

- A significant number of responses query the lack of identified safeguarded land, suggesting that such land should be included in order to make the Plan sound, and provide a 'permanent' green belt boundary. Reference is made to previous Counsel advice on the duration of a 'permanent' green belt being ignored.

Consultation

- A number of residents local to Elvington make the same comment; that the Council should consult the local residents and their officers rather than "consult & ignore".

ANNEX 1 Statement of Representation Procedure

**STATEMENT OF REPRESENTATION PROCEDURE
AND AVAILABILITY OF DOCUMENTS
CITY OF YORK COUNCIL
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 – REGULATION 19
CITY OF YORK LOCAL PLAN PROPOSED MODIFICATIONS**

Title of Document

City of York Local Plan Proposed Modifications (June 2019)

Subject Matter and Area Covered

City of York Council has prepared a Publication version of the Local Plan which was submitted to the Secretary of State for Communities and Local Government on 25 May 2018. We are now publishing a series of proposed modifications to the City of York Local Plan. The Local Plan sets out the broad spatial planning and policy framework for the City of York up to 2032/33 with the exception of the Green Belt boundaries which will endure up to 2037/38. It includes a long-term vision and strategic objectives, policies to guide development, and allocations for new homes, jobs, and open space.

Period of Publication for Representations

Representations are invited on the City of York Local Plan Proposed Modifications for a period of 6 weeks, from Monday 10 June 2019 until Monday 22 July 2019 up until midnight. This statement provides details on how to make representations.

Statement of fact – How to view the documents

During this public representations period, copies of the main documents associated with the City of York Local Plan Proposed Modifications will be available to view on the council's website at www.york.gov.uk/localplan and will also be available for inspection at the following locations:

Council Offices:

City of York Council, West Offices, Station Rise, York (Mon – Fri 8.30 – 5.00, Sat & Sun closed)

Libraries:

Acomb Explore library, Front Street, Acomb (Mon, Tues & Thu 9.00 – 7.30, Wed 9.00 – 2.00, Fri 9.00 – 5.00, Sat 9.00 – 3.00, Sun closed)

Bishopthorpe Library, Main Street, Bishopthorpe (Mon 2.00 – 7.00, Tue, closed, Wed & Thu 10.00- 12.30 & 2.00 – 5.00, Fri 2.00 – 5.00, Sat 10.00 – 12.30, Sun closed)

Clifton Explore Library, Rawcliffe Lane, Clifton (Mon 2.30 – 5.30, Tue, Wed & Fri 10.00 – 1.00 and 2.00 – 5.30, Thu 2.30 – 7.00, Sat 10.00 – 1.00, Sun closed)

Copmanthorpe Library, Village Centre, Main Street, Copmanthorpe (Mon 9.00 – 1.00 & 2.00 – 5.30, Tue 2.00 – 6.30, Wed & Sun closed, Thu & Sat 9.00 – 1.00, Fri 2.00 – 5.30)

Dringhouses Library, Tadcaster Road, Dringhouses (Mon 2.00 – 6.00, Tue & Thu 9.30 – 12.30 & 2.00 – 5.30, Wed closed, Fri 2.00 – 5.30, Sat 9.30 – 1.00, Sun closed)

Dunnington Library, The Reading Room, Church Street, Dunnington (Mon 10.00 – 1.30, Tue 2.00 – 5.30, Wed, Fri & Sun closed, Thu 2.00 – 5.00, Sat 9.00 – 12.30)

Fulford Library, St Oswald's CE School, Heslington Lane, Fulford (Mon, Wed & Sun closed, Tue, Thu & Fri 2.00 – 5.00, Sat 10.00 – 12.30)

Haxby Explore Library, currently served by Mobile Library (Mon – Ethel Ward Playing Field 9.30-6.30, Tue – Haxby Memorial Hall 9.30-5, Wed – Wigginton Recreation Hall 9.30-5.00, Thu & Sun Closed, Fri – Oaken Grove Community Centre 9.30-5, Sat – Oaken Grove Community Centre 9.30 - 12.30)

Homestead Park Reading Café, 40 Water End, York (Mon –Sun 10.30-4.00)

Huntington Library, Garth Road, Huntington, York (Mon, Tue, Thu & Fri 9.30 – 12.00 & 2.00 – 5.00, Wed & Sun closed, Sat 9.30 – 12.30)

New Earswick Library, Hawthorn Terrace, New Earswick (Mon 9.00 – 12.30, Tue 9.00 – 12.30 & 2.00 – 4.30, Wed Self Service, Thu & Fri 1.30 – 5.00, Sat 10.00-12.00, Sun closed)

Poppleton Library, The Village, Upper Poppleton (Mon 10.00 – 12.30 & 2.00 – 5.00, Tue & Sun closed, Wed & Fri 10.00 – 12.30 & 2.00 – 5.00, Thu & Sat 10.00 – 12.30.)

Rowntree Park Reading Cafe, Rowntree Park Lodge, Richardson Street, York (Mon - Sun 9.00 – 4.30)

Strensall Library, 19 The Village, Strensall (Mon & Fri 2.00 – 5.00, Tue 10.30 – 12.30 & 2.00 – 5.00, Wed & Sun closed, Thu 9.30 – 12.30 & 2.00 – 4.00, Sat 10.00 – 12.30)

Tang Hall Explore Library, The Centre @ Burnholme, Mossdale Avenue, York (Mon -Thu 9.00 – 8.00, Fri 9.00 – 6.00, Sat 9.00 – 4.00, Sun 10.00-4.00)

York Explore Library, Library Square, York, YO1 7DS (Mon - Thu 9.00 – 8.00, Fri 10.00 – 6.00, Sat 9.00 – 5.00, Sun 11.00 – 4.00)

Documents which are available to view are:

- City of York Local Plan Proposed Modifications (June 2019)
- Sustainability Appraisal/Strategic Environmental Assessment Addendum (June 2019)
- Updated Habitats Regulations Assessment of the City of York Council Local Plan (February 2019)
- City of York Local Plan Publication Draft (February 2018) **to be read alongside the proposed modifications only**

There are also a number of background documents and evidence base reports which underpin the City of York Local Plan Proposed Modifications and these can be viewed on the council's website at www.york.gov.uk/localplan Copies of the background documents are also available for inspection at the council offices and York Explore.

Representations

Representations on the plan can be made throughout the representation period but must be made **before midnight on Monday 22 July 2019**. Please note that late representations cannot be accepted.

To structure your response in the way the inspector will consider comments at the public examination, the Planning Inspectorate has issued a standard form that is available to complete online on the consultation portal

www.york.gov.uk/consultations

Alternatively you can download from our website, or collect a response form from the locations listed above and return it to us by post to FREEPOST RTEG-TYYU-KLTZ, Local Plan, City of York Council, West Offices, Station Rise York YO1 6GA or email

localplan@york.gov.uk. All representations should include your name and postal address.

All individual representations received will be provided to the Planning Inspectors, together with a summary of the main issues raised during the representations period and considered as part of the Local Plan examination. Representations at this stage should only be made on the legal and procedural compliance of the City of York Local Plan Proposed Modifications, the soundness of the City of York Local Plan Proposed Modifications and whether the City of York Local Plan Proposed Modifications are in conformity with the Duty to Cooperate. Please refer to the guidance on the comments form when preparing representations.

Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the City of York Local Plan. Your response will be made available to view as part of the Examination process.

Request for Notification

Representations at this stage may be accompanied by a request to be notified about:

- the publication of the recommendations of the inspector appointed to carry out the independent examination; and
- the adoption of the local Plan.

You can also indicate whether at this stage whether you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence. The Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

For further details, please contact Forward Planning on **01904 552255** or email

localplan@york.gov.uk

How we will use your Personal Information

We will only use the personal information you give us as part of your response in accordance with the Data Protection Act 2018 to inform the Local Plan process.

We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't.

City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database.

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on [01904 554145](tel:01904554145)

¹ Section 20(3) Planning & Compulsory Purchase Act 2004 Regulations 17,22, 35 & 36 Town and Country Planning (Local Planning) England) Regulations 2012

² Regulation 19 Town and Country Planning (Local Planning) England) Regulations 2012

³ Regulation 35 Town and Country Planning (Local Planning) England) Regulations 2012

ANNEX 2 List of Prescribed Bodies and Parish Councils

Acaster Malbis Parish Council
Askham Bryan Parish Council
Askham Richard Parish Council
Bishopthorpe Parish Council
BT Openreach
Clifton Without Parish Council
Copmanthorpe Parish Council
Craven District Council
Deighton Parish Council
Department for Transport Rail Group
Dringhouses and Woodthorpe Parish Councillors
Dunnington Parish Council
Earswick Parish Council
East Riding of Yorkshire Council
Elvington Parish Council
Environment Agency
Escrick Parish Council
Fulford Parish Council
Hambleton District Council
Harrogate Borough Council
Haxby Town Council
Heslington Parish Council
Hessay Parish Council
Heworth Without Parish Council
Highways England
Historic England
Holtby Parish Council
Homes and Communities Agency
Huntington Parish Council
Kexby Parish Council
Leeds City Region LEP
Murton Parish Council
Naburn Parish Council
National Grid
National Grid Property Ltd
Natural England
Nether Poppleton Parish Council
Network Rail
New Earswick Parish Council
NHS Vale of York Clinical Commissioning Group
North York Moors National Park Authority
North Yorkshire County Council
North Yorkshire County Council (Highways)
North Yorkshire County Council (Planning)
North Yorkshire Fire & Rescue Service
North Yorkshire Police
North Yorkshire Police Authority
Northern Gas Networks

Northern Power Grid
Office of Rail and Road
Osbalwick Parish Council
Rawcliffe Parish Council
Rufforth with Knapton Parish Council
Ryedale District Council
Scarborough Borough Council
Selby District Council
Skelton Parish Council
Stockton on the Forest Parish Council
Strensall with Towthorpe Parish Council
Tees, Esk and Wear Valleys NHS Foundation Trust
The Coal Authority Planning & Local Authority Liaison Department
Upper Poppleton Parish Council
Wheldrake Parish Council
Wigginton Parish Council
York Consortium of Drainage Boards
York Hospitals NHS Foundation Trust
York North Yorkshire and Eastriding Local Enterprise Partnership (YNER LEP)
York Teaching Hospital NHS Foundation Trust
York, North Yorkshire and East Riding Local Enterprise Partnership (LEP)
Yorkshire Ambulance Service
Yorkshire Dales National Park Authority
Yorkshire Water

ANNEX 3 Copy of Consultation Letter

10 June 2019

Dear Sir/Madam,

City of York Local Plan Proposed Modifications (June 2019) Consultation

**in compliance with Regulation 19 of the Town and Country Planning (Local
Planning) (England) Regulations 2012**

I am writing to inform you about the opportunity to comment on the Proposed Modifications (June 2019) to the City of York Local Plan. The emerging Local Plan aims to support the city's economic growth, provide much needed housing and help shape future development over the next 15-years and beyond. It balances the need for housing and employment growth with protecting York's unique natural and built environment.

The City of York Local Plan is currently in the process of Examination by Independent Planning Inspectors following submission of the plan to the Secretary of State for Housing, Communities and Local Government on 25 May 2018.

We are now publishing a series of proposed modifications to the City of York Local Plan. This consultation gives York residents, businesses and other interested groups the opportunity to comment on additional evidence and modifications to the city's Local Plan prior to the hearing sessions as part of the Examination of the submitted plan. The Planning Inspectors undertaking the Examination have asked for the consultation as they consider the proposed modifications to be fundamental to what they are examining - the soundness and legal compliance of the plan. The consultation only looks at the specific proposed modifications and not other aspects of the plan.

The consultation period for the proposed modifications starts on **Monday 10 June 2019**. All consultation documents will be live on the Council's website (www.york.gov.uk/localplan) and available in West Offices reception and York Explore from this date. The main consultation documents will be available in all other libraries. Please see the Statement of Representation Procedure document, which accompanies this letter for more information.

Representations must be received by **midnight on Monday 22 July 2019** and should be made on a response form. Response forms are available on the Council's website (www.york.gov.uk/localplan) or you can complete an online response form via www.york.gov.uk/consultations. Alternatively, hard copies are available from the Council's West Offices reception, York Explore or from your local library.

Any representations received will be considered alongside the Local Plan Publication draft and the proposed modifications through the Examination in Public. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans (see below). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Legal Compliance

To be legally compliant the plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Soundness

Soundness is explained in paragraph 182 of the National Planning Policy Framework (NPPF). The Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' –namely that it is:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework (NPPF).

To help you respond, we have included Guidance Notes as part of the response

form. We recommend that you read this note fully before responding.


At this stage, unless you indicate you wish to appear at the Examination to make a representation you will not have the right to do so. Any written representations made will be considered by the independent Planning Inspectors.

All of the consultation and further evidence base documents published at previous rounds of consultation will also be available on the Council's website at www.york.gov.uk/localplan from 10 June 2019.

If you require any further information on the consultation please contact Forward Planning at localplan@york.gov.uk or on (01904) 552255.

We look forward to receiving your comments.

Yours faithfully

A handwritten signature in black ink, appearing to read "Mike Slater". The signature is written in a cursive style with a large initial 'M' and 'S'.

Mike Slater

Assistant Director – Planning and Public Protection

Annex 4 Copy of Consultation Comments Form

City of York Local Plan Proposed Modifications Consultation Response Form 10 June – 22 July 2019

OFFICE USE ONLY:

ID reference:

This form has three parts: **Part A** Personal Details, **Part B** Your Representation and **Part C** How we will use your Personal Information

To help present your comments in the best way for the Inspectors to consider them, we ask that you use this form because it structures your response in the way in which the Inspectors will consider comments at the Public Examination.

Using the form to submit your comments also means that you can register your interest in speaking at the Examination.

Please read the guidance notes and Part C carefully before completing the form. Please ensure you sign the form on page 6.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. If hand writing, please write clearly in blue or black ink.

Part A - Personal Details

Please complete in full; in order for the Inspectors to consider your representations you must provide your name and postal address.

1. Personal Details	2. Agent's Details (if applicable)
Title	
First Name	
Last Name	
Organisation (where relevant)	
Representing (if applicable)	
Address – line 1	
Address – line 2	
Address – line 3	
Address – line 4	
Address – line 5	
Postcode	
E-mail Address	
Telephone Number	

Representations must be received by Monday 22 July 2019, up until midnight.
Representations received after this time will not be considered duly made.

Guidance note

Where do I send my completed form?

Please return the completed form **by Monday 22 July 2019, up until midnight**

- To: FREEPOST RTEG-TYYU-KLTZ Local Plan, City of York Council, West Offices, Station Rise, York, YO1 6GA
- By email to: localplan@york.gov.uk

Electronic copies of this form are available to download at www.york.gov.uk/localplan or you can complete the form online at www.york.gov.uk/consultations

What can I make comments on?

This consultation provides the opportunity for anyone to make a representation on the proposed modifications and new evidence, further to the Local Plan which was submitted to the Planning Inspectorate in May 2018. You can make comments on any of the proposed modifications, the Sustainability Appraisal Addendum, the updated Habitats Regulation Assessment, and other background documents which include a Housing Needs Assessment update and an Addendum to Topic Paper 1: The Approach to Defining York's Green Belt. The purpose of this consultation is for you to say whether you think the proposed modifications and/or new evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this form.

Do I have to use the response form?

Yes please. This is because further changes to the plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and **use one response form for each topic or issue you wish to comment on**. You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Inspector to invite additional evidence in advance of, or during the Public Examination. Additional response forms can be collected from the main council offices and the city's libraries, or you can download it from the council's website at www.york.gov.uk/localplan or use our online consultation form via <http://www.york.gov.uk/consultations>. **However you choose to respond, in order for the inspector to consider your comments you must provide your name and address with your response.**

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on this standard form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

The scope of the Public Examination will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. You can indicate if you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

The Inspectors will use their own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

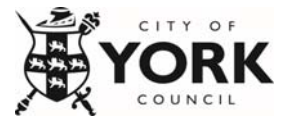
Where can I view the Consultation documents?

The Local Plan Proposed Modifications document, the Sustainability Appraisal/SEA Addendum and Updated Habitats Regulation Assessment (HRA) will be available for inspection at in all of York's libraries and City of York Council West Offices.

All supporting documents which underpin the City of York Local Plan Proposed Modifications are available to view online at www.york.gov.uk/localplan and are also available for inspection at City of York Council West Offices and York Explore.

Part B - Your Representation

(Please use a separate Part B form for **each** issue to you want to raise)



3. To which Proposed Modification or new evidence document does your response relate?

Proposed Modification Reference:

Document:

Page Number:

What does 'legally compliant' mean?

Legally compliant means asking whether or not the plan has been prepared in line with: statutory regulations; the duty to cooperate; and legal procedural requirements such as the Sustainability Appraisal (SA). Details of how the plan has been prepared are set out in the published Consultation Statements and the Duty to Cooperate Statement, which can be found at www.york.gov.uk/localplan

4. Based on the Proposed Modification or new evidence document indicated:

4.(1) Do you consider that the Local Plan is Legally compliant?

Yes

No

4.(2) Do you consider that the Local Plan complies with the Duty to Cooperate?

Yes

No

4.(3) Please justify your answer to question 4.(1) and 4.(2)

What does 'Sound' mean?

Soundness may be considered in this context within its ordinary meaning of 'fit for purpose' and 'showing good judgement'. The Inspector will use the Public Examination process to explore and investigate the plan against the National Planning Policy Framework's four 'tests of soundness' listed below.

What makes a Local Plan "sound"?

Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities



Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

5. Based on the Proposed Modification or new evidence document indicated:

5.(1) Do you consider that the Local Plan is Sound?

Yes No

If yes, go to question 5.(3). If no, go to question 5.(2).

5.(2) Please tell us which tests of soundness are applicable to 5.(1): (tick all that apply)

Positively prepared **Justified**

Effective **Consistent with national policy**

5.(3) Please justify your answers to questions 5.(1) and 5.(2)

6. (1) Please set out any change(s) you consider necessary to make the City of York Local Plan legally compliant or sound, having regard to the tests you have identified at question 5 where this relates to soundness.



You will need to say why this modification will make the plan legally compliant or sound. It will be helpful if you could put forward your suggested revised wording of any policy or text and cover succinctly all the information, evidence and supporting information necessary to support/justify your comments and suggested modification, as **there will not normally be a subsequent opportunity to make further representations unless at the request of the Inspectors, based on the matters and issues they identify for examination.**

7. If your representation is seeking a change at question 6.(1);

7.(1). do you consider it necessary to participate at the hearing sessions of the Public Examination? (tick one box only)

No, I do not wish to participate at the hearing session at the examination. I would like my representation to be dealt with by written representation

Yes, I wish to appear at the examination

If you have selected **No**, your representation(s) will still be considered by the independent Planning Inspectors by way of written representations.

7.(2). If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note: the Inspectors will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the hearing session of the examination.

Part C - How we will use your Personal Information

We will only use the personal information you give us on this form in accordance with the Data Protection Act 2018 to inform the Local Plan process. We only ask for what personal information is necessary for the purposes set out in this privacy notice and we will protect it and make sure nobody has access to it who shouldn't. City of York Council does not pass personal data to third parties for marketing, sales or any other commercial purposes without your prior explicit consent.

As part of the Local Plan process copies of representations made in response to this consultation including your personal information must be made available for public inspection and published on the Council's website; they cannot be treated as confidential or anonymous and will be available for inspection in full. Copies of all representations must also be provided to the Planning Inspectorate as part of the submission of the City of York Local Plan.¹

Storing your information and contacting you in the future:

The information you provide on this form will be stored on a database used solely in connection with the Local Plan. If you have previously responded as part of the consultation on the York Local Plan (previously Local Development Framework prior to 2012), your details are already held on the database. This information is required to be stored by the Council as it must be submitted to the Planning Inspectorate to comply with the law.¹ The Council must also notify those on the database at certain stages of plan preparation under the Regulations.² Should you wish to be removed from the database please contact the Forward Planning team at localplan@york.gov.uk or on 01904 552255. Should your personal information have changed please contact us with the correct details so that we can ensure the database is accurate and up to date. It should be noted that the Local Planning Authority is required to retain your information during the plan making process. The information you submit relating to the Local Plan can only cease to be made available 6 weeks after the date of the formal adoption of the Plan.³

Retention of Information

Once the Plan is formally adopted we will contact you to ascertain whether you wish to remain on the database so that we may contact you regarding planning policy matters including Supplementary Planning Documents and Neighbourhood Plans. If you don't respond to our emails/letters we will remove your details from the database

Your rights

To find out about your rights under the Data Protection Act 2018, you can contact the Council's Data Protection Officer at foi@york.gov.uk or go to the website for the Information Commissioners Office (ICO) <https://ico.org.uk/for-the-public/>

If you have any questions about this Privacy Notice, your rights, or if you have a complaint about how your information has been used or how long we have kept it for, please contact the Customer Feedback Team at foi@york.gov.uk or on 01904 554145.

Signature

Date

Annex 5 Index of respondents

PM SID 1	David Marsh
PM SID 4	Dennis Slights
PM SID 23	Kevin Ogilvy
PM SID 34	David Randon
PM SID 52	Pauline Bramley
PM SID 53	Peter Whitfield
PM SID 60	Michael Hargreaves Planning (Michael Hargreaves) OBO York Travellers Trust
PM SID 73	Peter Heptinstall
PM SID 75	Heslington Parish Council ~ Fiona Hill
PM SID 83	Rosmary Tozer
PM SID 84	Tim Tozer
PM SID 91	Strathmore Estates (Debbie Hulme) OBO Westfield Lodge and Yaldara Ltd
PM SID 92	Jonathan Shaw
PM SID 99	Strensall and Towthorpe Parish Council ~ Fiona Hill
PM SID 102	Elvington Parish Council ~ David Headland
PM SID 118	Historic England ~ Ian Smith
PM SID 122	Turnberry (Chris Pattison) OBO York Racecourse
PM SID 125	Persimmon Homes ~ Jess Kiely
PM SID 141	Avison Young (Andrew Johnson) OBO Oakgate
PM SID 145	Ken Guest
PM SID 150	Simon Lock
PM SID 160	Campaign to Protect Rural England North Yorkshire (CPRENY) ~ Fran Evans
PM SID 171	Megan Taylor
PM SID 172	Councillor Stephen Fenton
PM SID 181	Gateley Legal (Andrew Piatt) OBO Gateway Developments (York) Limited
PM SID 182	Johnson Mowatt (Mark Johnson) OBO KCS Development
PM SID 187	Ryedale District Council ~ Jill Thompson
PM SID 191	Martin Moorhouse
PM SID 192	Selby District Council ~ Clare Dickenson
PM SID 193	Peter Murray
PM SID 194	Jessica Murray
PM SID 195	Natasha Murray
PM SID 196	Annalise Murray
PM SID 197	Julie Murray
PM SID 199	Airedon Planning (Laura Fern) OBO Private Land Owner Jolyon Harrison
PM SID 210	Litchfields (Nicholas Mills) OBO Wakeford Properties
PM SID 213	Hambleton District Council ~ James Campbell
PM SID 214	O'Neill Associates (Eamonn Keogh) OBO Private Landowners Wendy and Richard Robinson
PM SID 218	JLL (Naomi Kellett) OBO Industrial Property Investment Fund (IPIF)
PM SID 220	O'Neill Associates (Phillip Holmes) OBO Private Landowner Mr Ibbotson
PM SID 221	Sally Firth
PM SID 222	Joanne Wedgwood
PM SID 227	Matthew Wedgwood
PM SID 231	Fulford Parish Council ~ Rachel Robinson
PM SID 242	East Riding of Yorkshire Council ~ Tom Bannister
PM SID 253	Litchfields (Alastair Willis) OBO Bellway Homes
PM SID 255	Home Builders Federation (HBF) ~ Joanne Harding
PM SID 260	Pegasus Group (Emma Ridley) OBO Lovel Developmensts Ltd
PM SID 261	Amanda Moore

PM SID 263	Harrogate Borough Council ~ Tracey Rathmell
PM SID 286	John Martin Pickard
PM SID 287	Katherine Pickard
PM SID 291	Derek Bowen
PM SID 301	Copmanthorpe Parish Council ~ Robert West
PM SID 333	Alison Stead
PM SID 338	Alan Cook
PM SID 339	Barton Willmore (Chris Atkinson) OBO Baratt and David Wilson Homes
PM SID 342	Andy Bell
PM SID 345	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PM SID 347	Planning Prospects (Jason Tait) OBO Miller Homes
PM SID 350	Carter Jonas (Simon Grundy) OBO Picton Capital
PM SID 354	Peter Vernon and Co ~ Peter Vernon
PM SID 357	ID Planning (Richard Irving) OBO Green Developments
PM SID 360	North Yorkshire County Council NYCC ~ David Bowes
PM SID 362	Dominic Stevens
PM SID 364	York Labour Party ~ Dave Merrett
PM SID 365	Rachael Maskell MP for York Central
PM SID 368	Indigo Planning (Now part of WSP) (Matthew Stocks) OBO Novus Investments
PM SID 369	Julian Sturdy MP for York Outer
PM SID 372	Gladman Developments (Craig Barnes) OBO Gladman Developments
PM SID 376	ELG Planning (Steven Longstaff Longstaff) OBO Taylor Wimpey
PM SID 378	Quod (Tim Waring) OBO Langwith Development Group
PM SID 381	Yorkshire Wildlife Trust ~ Sara Robin
PM SID 383	Natural England (Merlin Ash) OBO Natural England
PM SID 389	Sandra Atkinson
PM SID 394	PB Planning (Paul Butler) OBO McCarthy & Stone
PM SID 395	Nigel Thompson
PM SID 401	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Private Landowners Sunderland and Wilson
PM SID 412	Louisa Stevens
PM SID 418	Chris Wedgwood
PM SID 420	Jane Moorhouse
PM SID 581	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PM SID 589	Johnson Mowatt (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry and Hudson - Private Landowners west of ST8
PM SID 583	Johnson Mowatt (Mark Johnson) OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes, and E Crocker
PM SID 585	Johnson Mowatt (Mark Johnson) OBO Taylor Wimpey Ltd
PM SID 587	O'Neill Associates (Eamonn Keogh) OBO Shepherd Homes
PM SID 589	O'Neill Associates (Eamonn Keogh) OBO Malton Road Developments
PM SID 590	York and North Yorkshire Chamber of Commerce (Susie Cawood) OBO York and North Yorkshire Chamber of Commerce Property Forum
PM SID 592	O'Neill Associates (Graeme Holbeck) OBO Yorvik Homes
PM SID 594	PB Planning (Paul Butler) OBO TW Fields
PM SID 598	DPP (Mark Lane) OBO Linden Homes Strategic Land
PM SID 600	DPP (Mark Lane) OBO Shepherd Homes
PM SID 601	DPP (Mark Lane) OBO Private Landowner of Former H34
PM SID 603	Savills (UK) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PM SID 604	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)

PM SID 607	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PM SID 609	York and District Trades Union Council ~ (Dave Merrett
PM SID 611	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd
PM SID 612	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)
PM SID 614	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd
PM SID 616	The Coal Authority ~ Melanie Lindsley
PM SID 620	O'Neill Associates (Eamonn Keogh) OBO Galtres Garden Village Development Group
PM SID 621	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PM SID 651	David Carr
PM SID 826	Thomas Pilcher Homes ~ Thomas Pilcher
PM SID 827	Pilcher Homes Ltd ~ Robert Pilcher
PM SID 833	George Wright
PM SID 841	Jennifer Hubbard Planning Consultant ~ Jennifer Hubbard
PM SID 849	O'Neill Associates (Janet O'Neill) OBO University of York
PM SID 850	Highways England ~ Simon Jones
PM SID 855	Graham Lishman
PM SID 856	John Young
PM SID 857	Susan Goodhead
PM SID 858	Public Health ~ Phillipa Press
PM SID 859	Freeths LLP (David Stanniland) OBO The Lindum Group Ltd
PM SID 860	Councillor ~ Paul Doughty
PM SID 861	Freeman Johnson Solicitors OBO Mr H C Wrigley
PM SID 862	Edward Courtney
PM SID 863	R F Arnold
PM SID 864	Parochial Church Council St mary's Haxby ~ Noreen Bartram
PM SID 865	Catherine Blacketer
PM SID 866	DPP (Mark Lane) OBO Mulgrave Properties
PM SID 867	DPP (Mark Lane) OBO Yorvik Homes
PM SID 868	West Yorkshire Combined Authority ~ Alan Reiss
PM SID 869	Ray Calpin
PM SID 870	J Philip Coverdale
PM SID 871	Councillor Anne Hook OBO Residents of Rural West York
PM SID 872	Jeffrey Stern
PM SID 873	Ian Hudson
PM SID 874	Bryan Boulter
PM SID 875	Peter Mott
PM SID 876	Joanne Kinder
PM SID 877	James McBride
PM SID 878	Sarah Mills
PM SID 879	Pat Mills
PM SID 880	Edmund Kinder
PM SID 881	Cordula Van Wyhe
PM SID 882	Simon Willis
PM SID 883	O'Neill Associates (Tim Ross) OBO St Peters School
PM SID 884	G L Dutch
PM SID 885	Lime Tree Homes Ltd ~ Thomas Pilcher

PM SID 886	York Labour Group ~ Dave Merrett
PM SID 887	John Micklethwaite-Howe
PM SID 888	Geoff Beacon
PM SID 889	Litchfields (Suzanne Yates) OBO Oakgate Group Ltd
PM SID 890	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PM SID 891	Johnson Mowatt (Mark Johnson) OBO Redrow Homes
PM SID 892	Josephine Tomlin
PM SID 893	Heather Harris
PM SID 894	Carter Jonas (Simon Grundy) OBO Karbon Homes
PM SID 895	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PM SID 896	Wendy Brierley
PM SID 897	Kieran Packman
PM SID 898	PB Planning (Paul Butler) OBO Persimmon Homes
PM SID 899	Holly Steel
PM SID 900	Jemima Whelan
PM SID 901	O'Neill Associates (Phillip Homes) OBO York St John University
PM SID 902	Jacqui & Christopher Chainey & Cadman
PM SID 903	Maurice Dodson
PM SID 904	Anneliese Emmans Dean
PM SID 905	Graham Holme
PM SID 906	Keith Emmans
PM SID 907	Michael Emmans-Dean
PM SID 908	John Gallery
PM SID 909	Sophie Bell
PM SID 910	Chris Hawkswell
PM SID 911	Matthew Arthey OBO spouse and child
PM SID 912	Stephen Hawkswell
PM SID 913	Sally Hawkswell
PM SID 914	Leeds City Region LEP ~ James Whiteley
PM SID 915	Jeanne Lister
PM SID 916	Carter Jonas (Simon Grundy) OBO Schoen Clinic York Ltd/ The Retreat Living
PM SID 917	Thomas Pilcher
PM SID 918	Robert Pilcher
PM SID 919	Mr Tooby
PM SID 920	Nigel Thompson OBO Residents of 1 to 6 Northfield Lane

Annex 6 Summary of all comments raised, in Plan policy order

Due to it's size, Annex 6 is published separately.