

YORK

CITY OF YORK
LOCAL PLAN

Regulation 22 (c) Consultation Statement Addendum
Proposed Modifications Consultation Report

Annex 6 - Summary of all comments raised
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) Summary of all Comments Raised

The Proposed Modifications consultation generated responses from 176 individuals, raising around 1,500 separate comments on the modifications and new evidence presented as well as wider aspects of the Plan, including on allocated sites and further alternative sites and/or green belt boundary changes.

Each proposed modification relates to a change in text which needs to be made within the submitted Local Plan. However, many of these individual changes stem from a single point of origin in the associated evidence base and therefore comments may relate to a whole theme rather than an individual modification. The comments received have therefore been summarised using a selection of codes which reflect the broad themes and topics which link the proposed modifications and new evidence bases; this reflects the structure of the main consultation report. These summaries should not be taken as a substitute for the full and comprehensive set of all duly made representations. A full set of representations are publicly available via the Council’s Local Plan Examination webpage, Proposed Modifications Consultation webpage and at the City of York Council offices.

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8. Plan-wide Theme – York’s Future Housing Requirement

This section presents comments on the City of York Housing Needs Update (Jan,2019), and Strategic Housing Land Availability Assessment (update to Fig. 6). This theme relates to PM3, PM4, PM5, PM20a to PM20d, PM21a to PM21d, PM22 and PM44, which are summarised under the following codes:

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Code HNU -	(Housing Needs Update).....	Page	87
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9. Comments in relation to: Plan-wide Theme – Removal of Strensall Barracks

This section presents comments which relate to the removal of housing allocations at Queen Elizabeth Barracks Strensall from the submitted plan as a result of potential impacts on Strensall Common Special Area of Conservation. This includes both sites ST35 and H59 from the submitted plan. This Theme relates to PM2, PM6, PM8, PM13, PM14, PM18, PM19, PM28, PM42, PM43 which are summarised under the following codes:

Code Policy SS19 (Site ST35 and H59)	Removal of Strensall Barracks	Page 114
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10. Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019).

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Code HRA	Habitats Regulation Assessment	Page 121

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

The section includes comments which relate to the Topic Paper which details the council's approach to setting green belt boundaries.

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

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Code H38	Land RO of Rufforth Primary School, Rufforth	Page 201
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13. Alternative Sites proposed through consultation

This section relates to proposals for alternative sites for development that are not currently allocated as such.

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14. Alternative GB boundaries proposed through consultation

This section relates to alternative green belt boundaries proposed through consultation.

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	Alternative GB boundary for ST8 Land North of Monks Cross	Page 223
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	Alternative GB boundary for ST15 Land West of Elvington Lane	Page 225
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	Alternative GB boundary for ST36 Imphal Barracks, Fulford Road	Page 228
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	Alternative GB boundary for ST19 Land at Northminster Business Park	Page 230
	Alternative GB boundary for H39 North of Church Lane Elvington	Page 231
	Alternative GB boundary for SP1 The Stables Elvington	Page 233
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15. Summary of General Comments

The section relates to general comments and miscellaneous issues.

Code Gen	Alternatives sites	Page 246
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7. Proposed Modifications PM1 to PM46

PM1 - Whole Plan Reference change Proposals map to policies map
To clarify title of accompanying maps to the plan

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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No Comments Received

7. Proposed Modifications PM1 to PM46

PM2 - Removal of Deleted Policies from Contents Page

Reference to policy SS19 removed following removal of policy SS129/Site allocation ST35 (Queen Elizabeth Barracks, Strensall)

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM3 - Explanation of City of York Housing Needs

To align with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 published by GL Hearn

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : York's future Housing Requirement.
Refer to Section 8

7. Proposed Modifications PM1 to PM46

PM4 - Policy SS1: Delivering Sustainable Growth for York

To align with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 published by GL Hearn

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : York's future Housing Requirement.
Refer to Section 8

7. Proposed Modifications PM1 to PM46

PM5 - Policy SS1: Delivering Sustainable Growth for York

To align with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 published by GL Hearn

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : York's future Housing Requirement.
Refer to Section 8

7. Proposed Modifications PM1 to PM46

PM6 - Policy SS10: Land North of Monks Cross

Reference to ST35 removed following removal of policy SS19/ Site Allocation ST35 from the plan.

Unique comment ref	Complies with DtC?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

Proposed Modification

PMSID 0583/ Mod/PM6/1			No objection to removal of reference to ST35 from policy wording criteria x.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
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7. Proposed Modifications PM1 to PM46

PM7 - Policy SS12: Land West of Wigginton Road
To correct the roundabout name referenced.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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No Comments Received

7. Proposed Modifications PM1 to PM46

PM8 - Policy SS12: Land West of Wigginton Road

Reference to ST35 removed following removal of policy SS19/ Site Allocation ST35 from the plan

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM9 - Policy SS13: Land West of Elvington Lane
To clarify that the openspace is not shown on the policies map.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0075/ S/PM9/1		Not Sound	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.	Heslington Parish Council

7. Proposed Modifications PM1 to PM46

PM10 - Policy SS13: Land West of Elvington Lane

To clarify the link to new openspace (OS10) as detailed in the Habitat Regulation Assessment (2018)

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0875/ LC/PM10/1	Yes		Believed to be Legally Compliant	Peter Mott
PMSID 0897-1/ LC/PM10/1	Yes		Considers plan to be compliant legally and with duty to cooperate	Kieran Packman
PMSID 0913 - 4/LC/PM10/1	No		CYC are trying to ease their guilty conscience and buy off any environmental lobbyists	Sally Hawkswell
Soundness				
PMSID 0075/ S/PM10/1		Not Sound	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.	Heslington Parish Council
PMSID 0383/ S/PM10/1		Sound	Welcome this clarification regarding the necessary mitigation necessary for ST15	Natural England (Merlin Ash)
PMSID 0865/ S/PM10/1		Not Sound	OS10 should remain in agricultural use	Catherine Blacketer
PMSID 0875/ S/PM10/1		Not Sound	Buffer zone OS10 does not extend to the SW of the proposed ST15. There is no consideration of the effect f water runoff from ST15 towards the Tillmire.	Peter Mott
PMSID 0897-1/ S/PM10/1		Sound	Considers Local Plan to be sound	Kieran Packman
PMSID 0913 - 4/S/PM10/1		Not Sound	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	Sally Hawkswell
Proposed Modification				

7. Proposed Modifications PM1 to PM46

PM10 - Policy SS13: Land West of Elvington Lane

To clarify the link to new openspace (OS10) as detailed in the Habitat Regulation Assessment (2018)

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0865/ Mod/PM10/1			Allow OS10 to remain in agricultural use	Catherine Blacketer
PMSID 0875/ Mod/PM10/1			A full environmental impact assessment is needed for ST15 on its impact on the Tillmire, including water runoff.	Peter Mott
PMSID 0875/ Mod/PM10/2			Buffer zone OS10 should be extended to the SE to include all greenfield land between ST15 and the Tillmire	Peter Mott

7. Proposed Modifications PM1 to PM46

PM11 - Policy SS13: Land West of Elvington Lane

Reference to ST35 removed following removal of policy SS19/ Site Allocation ST35 from the plan.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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No Comments Received

7. Proposed Modifications PM1 to PM46

PM12 - Policy SS18: Station Yard, Wheldrake

To clarify the mitigation required as detailed in the Habitat Regulation Assessment (2018)

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0354-2/ LC/PM12/1	Yes		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.	Peter Vernon Vernon & Co
Soundness				
PMSID 0383/ S/PM12/1		Sound	Welcomes this clarification regarding mitigation necessary for avoiding adverse effects on the integrity of the Lower Derwent Valley SPA/Ramsar/SSSI.	Natural England (Merlin Ash)

7. Proposed Modifications PM1 to PM46

PM13 - Policy SS18: Station Yard, Wheldrake

To clarify the mitigation required as detailed in the Habitat Regulation Assessment (2018)

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM14 - Policy SS19: Queen Elizabeth Barracks, Strensall

Site removed following the outcomes of the Habitat Regulations Assessment (Feb 2019), which has not been able to rule out adverse effects on the integrity of Strensall Common Special Area of Conservation (SAC).

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM15 - Policy SS20: Imphal Barracks

To correct the developable area and housing number referenced in the policy.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0345/ S/PM15/1		Not Sound	CYC is proposing to modify the explanatory text to SS20 such that it quotes a smaller site area for the allocation than appears in the submitted Plan. DIO objects to the Green Belt boundary proposed in the submitted Plan, which runs through the Barracks. The size of the allocation will need to be re-calculated when the correct boundary is assumed.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

7. Proposed Modifications PM1 to PM46

PM16 - Policy EC1: Employment Allocations

Modification to associated footnote to refer to Policy G12 following removal of policy SS19/ Site Allocation ST35.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0862/ LC/PM16/1	Yes		Seems to be legally compliant to respondent	Edward Courtney
Soundness				
PMSID 0099/ S/PM16/1		Sound	Support the requirement that site E18 (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.	Strensall with Towthorpe PC (Fiona Hill)
PMSID 0345/ S/PM16/1		Not Sound	CYC is proposing to modify the explanatory text to Policy EC1 by adding in words which describe the ecological evidence that CYC will require at the planning application stage in respect of proposals for Towthorpe Lines. The additional wording is not necessary. Applications for planning permission will be complied in due course having regard to all statutory requirements and relevant Government Policy.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0383/ S/PM16/1			Welcomes the proposed requirements regarding the mitigation of impacts on Strensall Common SAC for allocation E18.	Natural England (Merlin Ash)

7. Proposed Modifications PM1 to PM46

PM17 - Policy EC1: Employment Allocations

New explanatory text to ensure that allocation E18 is considered in relation to Strensall Common SAC.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0862/ LC/PM17/2	Yes		Seems to be legally compliant to respondent	Edward Courtney
Soundness				
PMSID 0099/ S/PM17/1		Sound	Support the requirement that site E18 (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.	Strensall with Towthorpe PC (Fiona Hill)
PMSID 0345/ S/PM17/1		Not Sound	CYC is proposing to modify the explanatory text to Policy EC1 by adding in words which describe the ecological evidence that CYC will require at the planning application stage in respect of proposals for Towthorpe Lines. The additional wording is not necessary. Applications for planning permission will be complied in due course having regard to all statutory requirements and relevant Government Policy.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0383/ S/PM17/1		Sound	Welcomes the proposed requirements regarding the mitigation of impacts on Strensall Common SAC for allocation E18.	Natural England (Merlin Ash)

7. Proposed Modifications PM1 to PM46

PM18 - Policy H1: Housing Allocations (H59)

Site removed following the outcomes of the Habitat Regulations Assessment (Feb 2019), which has not been able to rule out adverse effects on the integrity of Strensall Common Special Area of Conservation (SAC).

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM19 - Policy H1: Housing Allocations (ST35)

Site removed following the outcomes of the Habitat Regulations Assessment (Feb 2019), which has not been able to rule out adverse effects on the integrity of Strensall Common Special Area of Conservation (SAC).

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM20a to PM20d - Policy H1: Housing Allocations

To align the housing trajectory with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 (GL Hearn)

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM21a to PM21d - Policy H1: Housing Allocations

To align the housing trajectory with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 (GL Hearn)

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : York's future Housing Requirement.
Refer to Section 8

7. Proposed Modifications PM1 to PM46

PM22 - Policy H1: Housing Allocations Explanation

To align with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 published by GL Hearn

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : York's future Housing Requirement.
Refer to Section 8

7. Proposed Modifications PM1 to PM46

PM23 - HW1: Protecting Existing Facilities

Limited new text to add clarity and to better reflect NPPF definition.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : York's future Housing Requirement.
Refer to Section 8

7. Proposed Modifications PM1 to PM46

PM24 - Policy D1: Placemaking

To clarify that residential amenity should be considered as part of overall design standards as part of the planning process.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0075/ S/PM24/1		Not Sound	new development should not cause noise disturbance and loss of amenity for nearby residents? Potentially every owned and tenanted farm in the area will be affected i.e. 10 working farms. Traffic will be brought into previously agricultural greenfield land by the ST15 site, the road access to it and by ST27. Overall the increase in traffic air and noise pollution is certain to rise. How does this square with PM24.	Heslington Parish Council
PMSID 0904/ S/PM24/1		Not Sound	ST15 development should not cause noise disturbance and loss of amenity for nearby residents	Anneliese Emmans Dean

7. Proposed Modifications PM1 to PM46

PM25 - Policy D4: Conservation Areas

To clarify that all planning applications should consider conservation areas, not solely outline planning applications.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0333-2/ S/PM25/1		Not Sound	Modifications state that account should be taken of development within or setting of the conservation area. This is not being done for H39. and a modification is being proposed for the green belt which is NOT listed in the proposed modifications. I oppose the removal of green belt status in Elvington. CYC TP1 Approach to Defining York's Green Belt Addendum Section 9 conclusions describes the exceptional circumstances that exist in order to justify releasing land from the green belt. These exceptional circumstances do not I believe apply to H39 given the key areas of openness identified in the conservation area. Alternative site H26 is preferable for housing. Urge CYC to reinstate H26 and restore the green belt to Elvington and remove H39 building proposal. In the 2018 CYC Preferred Sites Consultation it was stated that H26 provides a gap between the main village and the industrial/commercial areas to the north - this is erroneous and would be obvious on a site visit.	Alison Stead
PMSID 0611/ S/PM25/1		Not Sound	Typically, local planning authorities do not accept outline planning applications within conservation areas because it is not possible to assess the impact of a proposal without full design details. As such, it is usual that only full applications can be submitted within conservation areas, and outline applications are usually always rejected. The original policy was therefore intended to make clear the explicit support for the submission of outline applications where detailed design information is included as part of the application pack. The proposed modification has now changed the essence of the policy, as it no longer is explicit in regards to how outline planning applications will be accepted within conservation areas where full design details are submitted in support.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd
PMSID 0612/ S/PM25/1		Not Sound	Typically, local planning authorities do not accept outline planning applications within conservation areas because it is not possible to assess the impact of a proposal without full design details. As such, it is usual that only full applications can be submitted within conservation areas, and outline applications are usually always rejected. The original policy was therefore intended to make clear the explicit support for the submission of outline applications where detailed design information is included as part of the application pack. The proposed modification has now changed the essence of the policy, as it no longer is explicit in regards to how outline planning applications will be accepted within conservation areas where full design details are submitted in support.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)
PMSID 0614/ S/PM25/1		Not Sound	Typically, local planning authorities do not accept outline planning applications within conservation areas because it is not possible to assess the impact of a proposal without full design details. As such, it is usual that only full applications can be submitted within conservation areas, and outline applications are usually always rejected. The original policy was therefore intended to make clear the explicit support for the submission of outline applications where detailed design information is included as part of the application pack. The proposed modification has now changed the essence of the policy, as it no longer is explicit in regards to how outline planning applications will be accepted within conservation areas where full design details are submitted in support.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd

7. Proposed Modifications PM1 to PM46

PM25 - Policy D4: Conservation Areas

To clarify that all planning applications should consider conservation areas, not solely outline planning applications.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Proposed Modification				
PMSID 0611/ Mod/PM25/1			Proposed modification confuses more than it clarifies. Revert back to original wording.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd
PMSID 0612/ Mod/PM25/1			Proposed modification confuses more than it clarifies. Revert back to original wording.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)
PMSID 0614/ Mod/PM25/1			Proposed modification confuses more than it clarifies. Revert back to original wording.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd

7. Proposed Modifications PM1 to PM46

PM26 - Policy G12: Biodiversity and Access to Nature

Policy amended to include reference to internationally and nationally designated nature conservation sites and how they will be considered through the planning process following Natural England's response to the Regulation 19 consultation.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0333-1/ LC/PM26/1	Yes		There has been consultation and the national inspector has highlighted the need to consult again because of proposed modifications to green belt around York: this is being done.	Alison Stead
PMSID 0381/ LC/PM26/1	Yes		Within the CYC boundaries there are both national and internationally designated wildlife sites. Clarifying the protection of these sites through the Local Plan is very important and fully supported by YWT. This will make the final Plan legally compliant. The authority will also be co-operating with neighbouring authorities as the internationally designated Lower Derwent Valley is adjacent to east Yorkshire and Selby as well as CYC.	Yorkshire Wildlife Trust (Sara Robin)
Soundness				
PMSID 0218/ S/PM26/1		Not Sound	The modification to Policy G12 in its current form is unsound as the designation of the SINC at Poppleton Glassworks is not justified. Policy G12 should provide greater flexibility in its wording to allow SINC sites to be de-designated if relevant evidence is provided. Moreover, the Poppleton Glassworks site does not qualify as a SINC and should be removed as such from the Local Plan.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund
PMSID 0333-1/ S/PM26/2		Not Sound	The modification at PM26 is ok but is not being followed through in the case of H39 North of church lane where the building proposal is not taking into account the buffer zone needed to a Site of local interest viz Hedgerow E50 and proximity of Derwent lngs SSSI. Evidence is required to show that the modification is being implemented when building proposals are put forward for this site.	Alison Stead
PMSID 0381/ S/PM26/1		Sound	Within the CYC boundaries there are both national and internationally designated wildlife sites. Clarifying the protection of these sites through the Local Plan is very important and fully supported by YWT. Yorkshire Wildlife Trust considers that the plan will be more consistent with national policy and the allocations proposed better justified with the strengthening of this policy.	Yorkshire Wildlife Trust (Sara Robin)
PMSID 0383/ S/PM26/1		Sound	Satisfied that PM26 addresses the concerns raised at publication consultation regarding Policy G12	Natural England (Merlin Ash)
PMSID 0383/ S/PM26/2		Sound	Welcome the inclusion of criterion vii.	Natural England (Merlin Ash)
PMSID 0383/ S/PM26/3		Sound	Welcome the clarification regarding the need for developments to consider mitigation for the impact of recreational disturbance on designated sites, in the context of the findings of the HRA.	Natural England (Merlin Ash)

7. Proposed Modifications PM1 to PM46

PM26 - Policy GI2: Biodiversity and Access to Nature

Policy amended to include reference to internationally and nationally designated nature conservation sites and how they will be considered through the planning process following Natural England's response to the Regulation 19 consultation.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0904/S/PM26/1		Not Sound	This will have an adverse effect on a SSSI (i.e. The Tillmire in relation to ST15)	Anneliese Emmans Dean

Proposed Modification

PMSID 0383/Mod/PM26/2			Advise that the Council considers providing further details on how net gains for biodiversity will be delivered, either through the Local Plan or supporting/supplementary plans and guidance.	Natural England (Merlin Ash)
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7. Proposed Modifications PM1 to PM46

PM27 - Policy GI2: Biodiversity and Access to Nature

To clarify how the planning approach to internationally and nationally significant nature conservation sites.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0383/ S/PM27/1		Sound	Satisfied that PM27 addresses the concerns raised at publication consultation regarding Policy GI2	Natural England (Merlin Ash)
PMSID 0383/ S/PM27/2		Sound	Welcome the inclusion of criterion vii. Advise that the Council considers providing further details on how net gains for biodiversity will be delivered, either through the Local Plan or supporting/supplementary plans and guidance.	Natural England (Merlin Ash)
PMSID 0383/ S/PM27/3		Sound	Welcome the clarification regarding the need for developments to consider mitigation for the impact of recreational disturbance on designated sites, in the context of the findings of the HRA.	Natural England (Merlin Ash)
PMSID 0904/ S/PM27/1		Not Sound	There is no proof from CYC that OS10 mitigation will protect the Tillmire SSSI from development of ST15	Anneliese Emmans Dean

7. Proposed Modifications PM1 to PM46

PM28 - Policy GI6: New Open Space Provision

Removal of indicative open space associated with Policy SS19 and allocations ST35/H59, which are removed following the outcomes of the Habitat Regulations Assessment (Feb 2019).

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

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

The methodology indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built up area.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Soundness

PMSID 0160/ S/PM29/1	Sound		Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
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7. Proposed Modifications PM1 to PM46

PM30 - Policies Map Green Belt Change – rear of St Olaves and St Peters School.

To represent changes since the boundary was drafted and to reflect completed planning permission.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0160/S/PM30/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0883/S/PM30/1		Not Sound	Council's defining of Green Belt on St Peters land 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	O'Neill Associates (Tim Ross) OBO St Peters School
Proposed Modification				
PMSID 0883/Mod/PM30/1			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.	O'Neill Associates (Tim Ross) OBO St Peters School

7. Proposed Modifications PM1 to PM46

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

Unique comment ref	Complies with DtC?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0160/ S/PM31/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)

7. Proposed Modifications PM1 to PM46

PM32 - Policies Map Green Belt Change – Jockey Lane.

The methodology indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built up area.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Soundness

PMSID 0160/ S/PM32/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
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7. Proposed Modifications PM1 to PM46

PM33 - Policies Map Green Belt Change – Land to the rear of Osbaldwick Village

It is proposed that the boundary should closely follow the main urban area as represented by identifiable built structures to the North of Osbaldwick Village, as opposed to the more irregular garden, paddock and strip fields

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0160/S/PM33/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0338/S/PM33/1		Sound	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.	Alan Cook

7. Proposed Modifications PM1 to PM46

PM34 - Policies Map Green Belt Change – Land at Hull Rd, North of Grimston Bar.

It is proposed that the boundary should align with the limit of the urban area to the south at Grimston Bar Park and Ride rather than protrude along the road carriageway to offer greater consistency with methodology.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Soundness

PMSID 0160/ S/PM34/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
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7. Proposed Modifications PM1 to PM46

PM35 - Policies Map Green Belt Change – Heslington Road and Garrow Hill.

The methodology indicates that where the metalled surfaces of roads are in proximity to urban areas they should be considered to form part of the built-up area.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Soundness

PMSID 0160/ S/PM35/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
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7. Proposed Modifications PM1 to PM46

PM36 - Policies Map Green Belt Change – Little Hob Moor

Little Hob Moor provides a break in the urban landscape rather than connecting to the wider countryside. While it is important that this land remains open this can be achieved through other policies as it is designated open space.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Soundness

PMSID 0160/S/PM36/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
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Proposed Modification

PMSID 0172/Mod/PM36/1			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.	Cllr Stephen Fenton
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7. Proposed Modifications PM1 to PM46

PM37 - Policies Map Green Belt Change – South of Askham Bar Park and Ride

To represent changes since first drafted to reflect the new Askham Bar Park and Ride boundary.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0160/ S/PM37/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)

7. Proposed Modifications PM1 to PM46

PM38 - Policies Map Green Belt Change – York College, Tadcaster Road.

It is proposed that the boundary of proposed expansion be linked more closely to features on the ground to provide the most permanence.

Unique comment ref	Complies with DtC?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0160/ S/PM38/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)

7. Proposed Modifications PM1 to PM46

PM39 - Policies Map Green Belt Change – Strensall Village

it is proposed that the detailed inner Green Belt boundary around the village of Strensall should follow along Ox Carr Lane, placing all the land to the south of this (around Queen Elizabeths Barracks) within the Green Belt

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Legal Compliance

PMSID 0210/ LC/PM39/1	Yes		No comment provided	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0607/ LC/PM39/1	Yes			Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd

Soundness

PMSID 0099/ S/PM39/1		Sound	Support boundary change	Strensall with Towthorpe PC (Fiona Hill)
PMSID 0160/ S/PM39/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0345/ S/PM39/1		Not Sound	DIO are firmly of the view that the boundary defined in the submitted Plan is consistent with national planning policy requirements/objectives and is therefore sound and therefore do not support the proposed modification of strensall village boundary.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0345/ S/PM39/2		Not Sound	In relation to the 5 purposes of GB: the QEB land is not open, it is developed and 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 an 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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

7. Proposed Modifications PM1 to PM46

PM39 - Policies Map Green Belt Change – Strensall Village

it is proposed that the detailed inner Green Belt boundary around the village of Strensall should follow along Ox Carr Lane, placing all the land to the south of this (around Queen Elizabeths Barracks) within the Green Belt

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0607/S/PM39/1		Not Sound	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 as PM39 fails to release land at Brecks Lane, Strensall from the Green Belt. 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.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd

Proposed Modification

PMSID 0210/Mod/PM39/2			Exclude land at Southfields Road and Princess Road, Strensall, from the Green Belt and either allocate as residential development or safeguarded land on the Local Plan Proposal Map.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0345/Mod/PM39/1			Revert to the Green Belt boundary defined in the submitted Plan and do not identify the QEB land as within the Green Belt designation as it is not open, it is developed and 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 an 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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

7. Proposed Modifications PM1 to PM46

PM40 - Policies Map Green Belt Change – Elvington Industrial Estate, Elvington

To correct an error and to ensure that the boundary aligns with recognisable features on the ground that offer the greatest permanence.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0160/S/PM40/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0191-3/S/PM40/1		Not Sound	Definition of area as Elvington Industrial is incorrect as there are two parts - residential and a small industrial estate. Are proposed to be taken out of Greenbelt is considerably larger incorporating perhaps 20% of houses within the village of Elvington. To remove this area of houses weakens/invalidates the Greenbelt characteristics of the surrounding land and ultimately lead to the degradation of the whole area.	Martin Moorhouse
PMSID 0191-3/S/PM40/1		Sound	Respondent has no objections to the industrial estate being removed from the Greenbelt	Martin Moorhouse
PMSID 0412-2/S/PM40/1		Not Sound	There are many reasons as to why these sites shouldn't be developed. Infrastructure is one, road access and road congestion is another, utilities another, flooding (the Green Belt land is waterlogged for most of the winter and after particularly rainy periods, and as we live in England, it rains a lot). It's used by wildlife as a safe area to hunt and live. Bats, which are a protected species in the UK, used these areas to nest, and it's illegal to disturb these nests. I could go on. Developing on these sites will be detrimental to the environment and the village as a whole.	Louisa Stevens
PMSID 0420-3/S/PM40/1		Not Sound	PM40:The map shows the portion that is being taken out of the greenbelt also covers Elvington Park & The Conifers- the industrial area should be the only part that is treated as green belt.	Jane Moorhouse
PMSID 0614/S/PM40/1			Change to the proposals map whereby additional land is excluded from the green belt and included within the development limits around Elvington Industrial Estate reflects circumstances found on the ground as this land does not contribute to openness of the countryside and is welcomed by owners of the Industrial Estate.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd

7. Proposed Modifications PM1 to PM46

PM40 - Policies Map Green Belt Change – Elvington Industrial Estate, Elvington

To correct an error and to ensure that the boundary aligns with recognisable features on the ground that offer the greatest permanence.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0859/S/PM40/1		Sound	Respondent supports the green belt boundary adjustment to the NE of Elvington Industrial Estate. Site has a proposed outline planning application which is pending determination. Site proposal has support of Council's Economic Growth Team.	Freeths LLP (David Stanniland) OBO The Lindum Group Ltd
PMSID 0877/S/PM40,TP1/1			Understand CYC are to remove Elvington from the Green Belt including Elvington Industrial Estate (E9) extended out over Elvington Park & Conifers. The proposed modifications will profoundly affect Elvington yet CYC on no occasion bothered to consult the parish representatives	James McBride
Proposed Modification				
PMSID 0420-3/Mod/PM40/1			Redefine the greenbelt boundary around Elvington Industrial Estate to exclude the residential housing estates of Elvington Park, The Conifers and Jubilee Court.	Jane Moorhouse

7. Proposed Modifications PM1 to PM46

PM41 - Policies Map Green Belt Change – Knapton Village

It is proposed that the village of Knapton is included within the Green Belt.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0160/ S/PM41/1			Respondent welcomes revised Green Belt boundaries and additional supporting text to corresponding policies and maps. Also strongly supports the 'washing over' of Knapton into the Green Belt. The minor revisions all provide greater clarity for all potential readers of the Local Plan.	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0368/ S/PM41/1		Not Sound	The built form of the village does not meet Green Belt purposes as the village has approximately 100 households and lacks 'openness' except for H53.	Indigo Planning (Now part of WSP) (Matthew Stocks) OBO Novus Investments
PMSID 0368/ S/PM41/2		Not Sound	Inclusion of village into Green Belt potentially presents a policy conflict in respect to H53 as the Green Belt policy would seek to resist development in addition to any future development of brown field land or vacant buildings within the village.	Indigo Planning (Now part of WSP) (Matthew Stocks) OBO Novus Investments
PMSID 0368/ S/PM41/3		Not Sound	Respondent believes the village already has a tightly drawn boundary which prevents coalescence and maintains the character of the village and of York. Maintenance of the historic character is aided by the Rufforth and Knapton Neighbourhood Plan.	Indigo Planning (Now part of WSP) (Matthew Stocks) OBO Novus Investments
PMSID 0894/ S/PM41/1		Not Sound	PM41 represents a cosmetic alteration that fails to take the opportunity to redraw the boundary to this part of York. The A1237 would form a more appropriate Green Belt boundary at this point.	Carter Jonas (Simon Grundy) OBO Karbon Homes

Proposed Modification

7. Proposed Modifications PM1 to PM46

PM41 - Policies Map Green Belt Change – Knapton Village

It is proposed that the village of Knapton is included within the Green Belt.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0368/ Mod/PM41/4			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	Indigo Planning (Now part of WSP) (Matthew Stocks) OBO Novus Investments

7. Proposed Modifications PM1 to PM46

PM42 - Policy T7: Minimising and Accommodating Generated Trips

Reference to SS19 removed following removal of policy SS19/ Site Allocation ST35 from the plan.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM43 - Table 15.2 - Delivery and Monitoring - Spatial Strategy

Reference to SS19 removed following removal of policy SS19/ Site Allocation ST35 from the plan.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Note that comments have been summarised in relation to the Plan-wide Theme : Removal of Strensall Barracks.
Refer to Section 9

7. Proposed Modifications PM1 to PM46

PM44 - Table 15.2: Delivery and Monitoring - Housing

To align with the updated housing requirement evidenced through the City of York – Housing Needs Update January 2019 published by GL Hearn

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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No Comments Received

7. Proposed Modifications PM1 to PM46

PM45 - Table 15.2: Delivery and Monitoring – Green Infrastructure

Additional target and indicator to respond to requirements for monitoring and review of recreational pressure at European designated nature conservation sites as a result of development in the plan.

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0345/S/PM45/1		Not Sound	In order to measure increases in pressure on the European Designated nature conservation sites, CYC needs accurate baseline data; it does not have this at present. CYC must also monitor how the Common is used going forward, but has not discussed this with the landowner (DIO). The proposals are therefore unsound.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0383/S/PM45/1		Sound	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	Natural England (Merlin Ash)

7. Proposed Modifications PM1 to PM46

PM46 - Table 15.2: Delivery and Monitoring - Green Infrastructure

New Indicator - Change in visitor numbers at and condition of Strensall Common SAC, Lower Derwent Valley SAC and Skipwith Common SAC

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0345/ S/PM46/1		Not Sound	In order to measure increases in pressure on the European Designated nature conservation sites, CYC needs accurate baseline data; it does not have this at present. CYC must also monitor how the Common is used going forward, but has not discussed this with the landowner (DIO). The proposals are therefore unsound.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0383/ S/PM46/1		Sound	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	Natural England (Merlin Ash)

7. Proposed Modifications PM1 to PM46

TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0333-2/ S/TP1Add/1			In the 2018 CYC Preferred Sites Consultation it was stated that H26 provides a gap between the main village and the industrial/commercial areas to the north - this is erroneous and would be obvious on a site visit. Alternative site H26 is preferable to H39 for housing	Alison Stead

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0181/LC/HREQ/1	No		The housing requirement is entirely inconsistent with the Governments approach through PPG.	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments
PMSID 0210/LC/HREQ/1	Yes		No comment provided	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0253/LC/HREQ/1	Yes		No specific details provided	Litchfields (Alastair Willis) OBO Bellway Homes
PMSID 0350/LC/HREQ/1	Yes		Housing figure does not meet true need.	Carter Jonas (Simon Grundy) OBO Picton Capital
PMSID 0357/LC/HREQ/1	Yes		No specific details provided	ID Planning (Richard Irving) OBO Green Developments
PMSID 0401/LC/HREQ/1	No		Latest housing update contains no assessment of the impact of changing the housing target on neighbouring authorities. There appears to be no assessment of the impact in relation to the Duty to Cooperate. Reducing the housing target for York has to have an impact on neighbouring authorities and their ability to meet their own housing need, and also on their economies. For this reason, we do not believe the Plan is legally compliant.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Mr and Mrs Sunderland and Wilson

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0581/LC/HREQ/1	No		There 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. Given the relationship between planned housing and jobs growth and in light of the fact that York is a net importer of journeys to work, the Council should demonstrate at the Examination that its Duty to Co-operate partners are satisfied that the revised lower figure has no adverse implications for them and the range across boundary issues identified through the process to date.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0604/LC/HREQ/1	Yes		Housing figure does not meet true need.	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)
PMSID 0607/LC/HREQ/1	Yes		No specific details provided	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0913 - 2/LC/HREQ/1	No		No specific details provided	Sally Hawkswell

Soundness

PMSID 0001/S/HREQ/1		Not Sound	Not effective as does not provide enough new housing.	David Marsh
PMSID 0053/S/HREQ/1		Not Sound	OAN still considered too high in light of other authoritative population projections since original plan submitted in 2018. Reduction in OAN numbers provides flexibility to reassess the suggested housing densities.	Peter Whitfield
PMSID 0091/S/HREQ/1		Not Sound	New evidence significantly and fundamentally differs to all previous evidence and the Government's own calculations. Proposed modifications do not make provision for sufficient housing.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0091/S/HREQ/2		Not Sound	Large scale sites require significant funding for infrastructure and are more complicated to deliver than small scale sites (i.e. H37) which should be re-instated as an allocated site.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/S/HREQ/3		Not Sound	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.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/S/HREQ/4		Not Sound	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.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/S/HREQ/5		Not Sound	Proposed Mods June 2019 alters OAN (790dpa) significantly from that proposed by CYC in 2013 (1090pa). This is out of kilter with previous CYC OAN figures and Govt objectives. Planned housing provision conflicts with Govt Housing White paper (Consultation Sept 2017) that indicates a requirement of 1070 dpa. The latest OAN of 790 dpa falls significantly below this figure at a time when the need for housing is greatest. A key objective of the NPPF is to 'boost significantly the supply of housing'. The Govts proposed standard formula for OAN equates to 1070 dpa - 790dpa is not compliant with the key objectives of the NPPF. CYC have not adopted the most appropriate strategy	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0099/S/HREQ/1		Sound	Support reducing the objectively assessed housing need from 867 to 790 dwellings per annum	Strensall with Towthorpe PC (Fiona Hill)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0125/S/HREQ/1		Not Sound	OAHN of 790 is fundamentally flawed in terms of demographic baseline. The 2016-based household projections indicate a net household growth of 458 dpa between 2017 and 2033 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly higher) 2017 and 2018 Mid-Year Estimates (MYEs), and through the application of accelerated headship rates amongst younger age cohorts, takes the demographic starting point to 706 dpa. However, an analysis of the MYE estimates has raised significant concerns regarding the robustness of the international migration statistics underpinning the 2016-based Sub-National Population Projections (SNPP). Applying long term trends to international migration levels into York, which are more in line with net migration into the City, this would increase the demographic starting point to 921 dpa.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HREQ/2		Not Sound	OAHN of 790 is fundamentally flawed in terms of market signals uplift. GL Hearn uplift of 15% is inadequate. Affordability pressures have worsened, target must be benchmarked against the planned level of supply and the city's low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completion figures. In order to respond to both market signals and affordable housing need an uplift of 20% would be more appropriate.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HREQ/3		Not Sound	OAHN of 790 is fundamentally flawed in terms of affordable housing need. GL Hearn has not provided additional uplift for this. The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need well above 1,105 dpa. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @ 30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York, Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of 1,215 dpa.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HREQ/4		Not Sound	OAHN of 790 is fundamentally flawed in terms of approach to student housing. Household projections explicitly exclude the housing needs of students living in communal establishments, GL Hearn has not adjusted the OAHN upwards to account for student growth.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HREQ/5		Not Sound	OAHN of 790 is fundamentally flawed in terms of approach to past under-delivery. It appears that the CoYC have included a very substantial amount of C2 student accommodation in the housing monitoring update figures, thus reducing the amount of shortfall they include in the annual housing target. Also appears to be over-estimation of dwellings provided and discrepancies between CYC's figures and those reported to MHCLG.	Persimmon Homes (Jess Kiely)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0160/S/HREQ/1		Sound	The previous figure of 870 dpa seemed unachievable, so the respondent welcomes the GL Hearn revised housing figure of 790 dpa. However, though the logic used by GL Hearn to arrive at their figure is understood, the respondent still considers the GL Hearn figure of 790 dpa to be still high in comparison to the current build out rate of 575 dpa,	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0171/S/HREQ/1			OAN still considered too high in light of other authoritative population projections since original plan submitted in 2018. Reduction in OAN numbers provides flexibility to reassess the suggested housing densities.	Megan Taylor
PMSID 0181/S/HREQ/1		Not Sound	Proposed Mods reduces housing requirement to 790pa and relies on the Housing Needs Update of January 2019 to reduce from 867pa. This is not a proper basis for reduction as the update is fundamentally based on 2016 Sub-National Population Projections and is entirely inconsistent with the Governments approach that maintains commitment to boosting housing levels at national basis and delivering 300k pa. The 2016 figures are prepared by ONS that uses more limited data compared to previous figures. This is a flawed approach. PPG requires the 2014 based household projections to be used for the standard method. CYC does not have a 5 year housing supply. HBF supports an annual provision of 1070 new dwellings pa over the Plan period and we support that figure.	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments
PMSID 0182/S/HREQ/1		Not Sound	OAHN of 790 is not sound. Should use 2014 population projections not the 2016, OAHN of 790 does not match government ambition to build 300,000 homes a year. Lowering OAHN now will cause affordability to further worsen and will cause future OAHN to be higher.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd
PMSID 0187/S/HREQ/1			Notes the proposed modifications to reduce the OAN and the policy mechanism to address historic under delivery. 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.	Ryedale District Council (Jill Thompson)
PMSID 0192/S/HREQ/1		Sound	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.	Selby District Council (Clare Dickinson)
PMSID 0210/S/HREQ/1		Not Sound	Council's current proposals will not seek to allocate sufficient housing to meet the identified OAHN and unmet need, as defined by respondent.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0210/S/HREQ/2		Not Sound	Proposed modification to housing requirement is not based on robust evidence and not compliant with the NPPF	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/HREQ/3		Not Sound	The Council's housing trajectory assumptions are not considered robust. Without sufficient housing allocations, as defined by respondent, the Local Plan risks not being able to deliver and be sufficiently flexible to change over the plan period	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/HREQ/4		Not Sound	Council's current OAHN of 790 is not based on robust evidence and therefore is not in accordance with the NPPF for sustainable development. The Council's trajectory is not robust and therefore questions whether the Council has sufficient sites for first five years or across the plan period.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0213/S/HREQ/1		Sound	No issues to raise.	Hambleton District Council (James Campbell)
PMSID 0214/S/HREQ/1		Not Sound	Consider OAHN of 790 to be inadequate. The 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.	ONEILL Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0214/S/HREQ/2		Not Sound	Calculates an alternative OAHN based off standard methodology of 1,070 dpa. Takes account of backlog, unimplemented permissions and windfalls to arrive at a OAHN figure of 17,097 over a 16 year plan period which is 1,069 dpa. Takes issue with the deliverability of some sites allocated, finds a 1,887 shortfall using council figures or a 2,902 shortfall using alternative assessment of need.	ONEILL Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0214/S/HREQ/3		Not Sound	Calculates two versions of five year land supply using council OAHN of 790 and alternative 1,070 dpa. Used Sedgefield method for backlog, applied 20% buffer given council would have failed housing delivery test for 6 of the last 7 years and takes account of unimplemented permissions. Considering just existing commitments gives a land supply of 1.48 years based on 1,070 dpa, their assumptions on backlog and commitments. Using council dpa of 790 with their assumptions on backlog, commitments and windfall gives a land supply of 3.34 years. 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.	ONEILL Associates (Eamonn Keogh) OBO Wendy & Richard Robinson

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0214/S/HREQ/4		Not Sound	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. In the meantime, the only credible source of housing land supply is likely to come sites such as the site West of Landing Lane (alt site 97) that can deliver houses quickly.	O'Neill Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0218/S/HREQ/1		Not Sound	Historically, it is clear, that CYC has consistently failed to provide the minimum level of housing required. It is noted that within the years where the housing requirement has been met (i.e. 2015/2016, 2016/2017, 2017/2018), a large part of this total has been due to the delivery of student house units. In this regard, it is assumed that student accommodation will naturally tail off and will reach a saturation point, therefore going forward it is assumed that student accommodation will not contribute to the general housing requirements at the same rate it has in the past. It is clear, when looking at guidance within paragraph 73 of the NPPF (2019), that due to under delivery of housing during the previous three years that a 20% buffer should be applied to the 790 dpa calculated as part of the Proposed Modifications (June 2019). If this is the case, the housing requirement should be increased, with additional land allocations made to meet the housing need in the city. In turn, further employment allocations should be made to allow for the associated economic benefits associated with an increase in housing allocations.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund
PMSID 0218/S/HREQ/2		Not Sound	Further employment allocations should be made to allow for the associated economic benefits associated with an increase in housing allocations. 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. To demonstrate this, it is forecast that there will be demand for 33.7 ha (173,393 sq m) of employment land between 2012 – 2037 (ELR July 2016 (5.4.1)). This equates to a demand of 1.35 ha of employment land per annum. This demand has been calculated using forecast job growth within York. Between 2012 – 2016 the net gain of employment land was 3.5 ha (ELR July 2016 (5.4.13)), which equates to 0.7 ha per annum. Using this data, this results in a deficit of 0.65 ha per annum of employment land, which equates to roughly half way to satisfying demand.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund
PMSID 0218/S/HREQ/3		Not Sound	It is proven through the Employment Land Review (2016) that CYC are currently delivering half of the employment land required. This is a serious matter as it either demonstrates that the ELR is wrong, or that there are issues with delivering existing site allocations, due to various constraints, rather than market appetite. As such, more sites need to be allocated to provide sufficient land for employment development.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund
PMSID 0218/S/HREQ/4		Not Sound	JLL has explored current demand and supply using Co-Star within existing employment sites and also land promoted across York to further understand the current position. Results show that 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. Results are important as they show that there is currently limited supply and it is important that allocated land is available and deliverable within the emerging local plan.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0220/S/HREQ/1		Not Sound	We consider that the Plan period should be moved forward to ensure development needs can be accommodated and to provide a green belt that will endure beyond due to the delays incurred in getting to this stage. We consider that CYCs assessment of housing requirement and allocations in the Plan to be inadequate 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.The governments approach of using a requirement of 1070 dpa is seen as reasonable not 790 dpa. Student housing should not be included in completions/unimplemented permissions. The Council's calculation of housing need is significantly flawed and, as a result the requirement for the Plan period in the Draft Plan falls nearly 7,500 units short of the more realistically assessed figure of 16,452 units. 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. The Plan will not secure Green Belt boundaries that will endure beyond the plan period and fails to achieve the clear imperative for the Council to "significantly boost the supply of housing." as required by the NPPF.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson
PMSID 0231/S/HREQ/1		Not Sound	The GL Hearn report is not sound and over-estimates the OAHN for the city over the plan period and beyond. Inadequate reasons given to support departure from the up-to-date official projections for the demographic starting point. No evidence about local demography or local household formation rates which would justify departing from the official Government projection. An increase in the OAHN above the official demographic starting point on the basis of a single employment forecast for York cannot be justified. Economic projections looking forward 15 or 20 years are unreliable. Accept that some market signals adjustment is appropriate but considers that this should be of the order of 10%, the same as recommended by GLH in its SHMA Update of September 2017. There is no new information in the January 2019 Housing Needs Update which would justify an increase above the original recommendation.	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/HREQ/2		Not Sound	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. Full reasons are given in Publication Draft representations, including reference to NPPF2012 paragraph 14. Notes that this position is supported by the legal opinion by John Hobson QC which has been submitted by the Council. Paragraph 10 makes clear that the Council should have assessed the impact of the potential development allocations on the primary purpose of the Green Belt before determining land requirements.	Fulford Parish Council (Rachel Robinson)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0253/S/HREQ/1		Not Sound	CYCs approach to identifying an assessed housing need of 790dpa is fundamentally flawed with deficiencies in the HNU that mean it is not soundly based. Demographic baseline - the 2016 based household projections of 458 dpa between 17-33 once a suitable adjustment rate has been applied to rebase projections to the 2017 and 2018 MYEs and application of accelerated headship rates takes the starting point to 706 dpa. Applying long term trends to international migration levels in York this would increase the demographic starting point to 921 dpa. Market Signals Adjustment - GL Hearn's uplift is 15%, Lichfield's consider a 20% uplift more appropriate added to the above this equates to 1105 dpa. Employment Growth Alignment - no upward adjustment is required to the demographic based need to ensure that the need of the local economy can be met. Affordable Housing Need - It is considered that to meet affordable housing need the OAHN range should be adjusted to 1910 dpa @ 30% of overall delivery. However, this delivery is unlikely to be delivered. Lichfield's consider a further 10% uplift would be appropriate in this instance resulting in a figure of 1215 dpa. Student Housing Need - It has been estimated that to meet the growth needs of the Universities would equate to 1346 dwellings over the 16 year Plan at an average of 84 dpa on top of 1215 dpa i.e. 1299 dpa. Rounded this equates to a OAHN of 1300 dpa between 2017-33 for York (22% higher than MHCLG standard method of 1069 dpa). Shortfall on housing delivery - concerns are rates as to how CYC have calculated past delivery. If Lichfield's higher OAHN of 1300 dpa is applied a figure of 285 dpa should be added to the OAHN.	Litchfields (Alastair Willis) OBO Bellway Homes
PMSID 0255/S/HREQ/1		Not Sound	Object to the housing requirement has been amended to 790dpa based on the HNU 2019 that has been produced to reflect the 2016 based sub-national population and household projections from ONS and CLG. Numbers of older people and younger peoples household formation rates are not set to grow as previously anticipated. ONS have stated 'household projections are not a prediction or forecast of how many houses should be built in the future'. Latest household projections will continue the trend of young people forming households much later in life than in previous years. Help to Buy has been brought in to try to address this issue. However, the Govt. aim of 300k dpa will not be achieved using the 2016 projections. PPG sets out how to undertake a Housing Needs Assessment through a standard method - requiring the continued use of the 2014 based projections.	Home Builders Federation (Joanne Harding)
PMSID 0260/S/HREQ/1			New housing figure of 790 dpa 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.	Pegasus Group (Emma Ridley) OBO Level Developments Ltd
PMSID 0263/S/HREQ/1			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.	Harrogate Borough Council (Tracey Rathmell)
PMSID 0291/S/HREQ/1		Not Sound	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.	Derek Brown

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0339/S/HREQ/1		Not Sound	The 2014-based MHCLG household projections should take preference to the 2016-based ONS household projections following the Government's technical consultation ¹ 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.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0345/S/HREQ/1		Not Sound	Both the modification (to 790dpa) and the 867dpa specified in the Submission Plan are unsound. CYC has shifted the demographic based starting point from the 2014 based to 2016 based projections, which significantly reduce the projected growth in population and households up to 2032. The use of the 2016 based projections does not form a credible position and the demographic starting point should be rebased to the 2014 projections. The Plan appears likely to underestimate need for homes to the detriment of both the economy and sustainable development objectives. 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. 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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0350/S/HREQ/1		Not Sound	Housing figure represents a negative approach to plan making. Inadequate consideration given to market signals and affordability issues. Plan does not provide for the evidenced need and is therefore fundamentally unsound.	Carter Jonas (Simon Grundy) OBO Picton Capital
PMSID 0357/S/HREQ/1		Not Sound	<p>Object to the proposed reduction in the OAN from 867 to 790 dwellings pa. The Housing Needs Update Paper (Jan 2019) proposes a reduction based on using a partial return to trend of headship rates and adjusting the population projections to achieve the expected growth in jobs. The 867 figure was based solely on the 2014 based household projections, a 10% uplift for market signals was recommended but not accepted by Council members. Nowhere in the Jan 2019 Housing Needs update is there a table showing the method used to achieve 867 dpa with a comparison as to what figure the 2016-based projections would derive. This surely should have been the starting point. It is clear that two completely different approaches were used.</p> <p>The 2016-based household projections would not achieve nationally the Government target of 300k homes pa it is clearly not fit for purpose and the lower OAN figure for York is unjustified. The Submitted OAN figure of 867 dpa should remain the starting point but increased by 10% for market uplift (as recommended) a minimum of 953 dpa therefore should be used. Using the standard method calculates an OAN of 1057 dpa an upward rather than downward figure.</p>	ID Planning (Richard Irving) OBO Green Developments

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Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0360/S/HREQ/1		Sound	Do not wish to question the annual housing provision.	North Yorkshire County Council - NYCC - (David Bowes)
PMSID 0364/S/HREQ/1		Not Sound	The City also faces one of the highest increases in house prices and rents in the country and the plan fails to deal either with the failure to meet objective (government led) targets for new housing, nor makes any serious attempt to deal with affordability. Despite the warnings and legitimate concerns of many groups and individuals in the City the Council is proposing in the modifications to the Publication draft to reduce future housing provision further in the face of the economic, housing and social difficulties in the city. This is totally unsound public policy.	York Labour Party (Dave Merrett)
PMSID 0364/S/HREQ/2		Not Sound	York has huge challenges in regards to general affordability of housing, affordable housing provision, inequality and low wages. The plan demonstrates no concern about this situation and clearly has no intention to 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. The overall homes target clearly does not meet the national direction of travel and is an artificial constraint on development. Given the shortage of homes of all types and York's position as the unaffordability capital of Yorkshire and Humberside these proposals are totally unjustified.	York Labour Party (Dave Merrett)
PMSID 0364/S/HREQ/3		Not Sound	The programme of sites is heavily dependent on brownfield land and in the case of sites like York Central (ST5) there are severe development constraints or risks associated with all these sites. Planning permission has recently been granted for York Central (ST5) so some progress has been made but many hurdles remain. 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. Sites are 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	York Labour Party (Dave Merrett)
PMSID 0364/S/HREQ/4		Not Sound	CYC policy is to give preference to, and only target 20% affordable on, brownfield sites (in contrast to 30% on greenfield). An analysis of 9 recent brownfield developments in the city shows an average affordable provision of 4%. The contribution to the City's housing needs is far below the 100% assumed in the plan. The greenfield supply is being artificially depressed in this plan and as a result the affordability problems particularly around family homes/houses will be maximized continuing to drive lower income households out of York. The inability of CYC to give figures on voids in new developments and to continue to represent the affordable target as 20% despite the evidence shows that the proposals are completely unjustifiable and fail to meet evidenced need.	York Labour Party (Dave Merrett)

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Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0364/S/HREQ/5		Not Sound	It is not possible to separate the overall housing target from the target for affordable homes. The GL Hearn report maintains the shortage of affordable homes at 570 per annum as in 2018 (itself massively lower than the previous draft local plan figure). To meet this target CYC would have to make 72% of new developments affordable. This is plainly ludicrous given the dependence on privately owned land and the figures showing that current brownfield developments are yielding less than 5%. The Local Plan targets for affordable homes at 20% brownfield and 30% greenfield are missed across all developments and particularly on brownfield sites that are the Council's preferred option.	York Labour Party (Dave Merrett)
PMSID 0364/S/HREQ/6			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. However we also advocated caution around ST36 Imphal barracks because of uncertainty; this has been ignored. Together these two sites create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments. In addition we advocated that sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are a dhoc changes which have been reactively prepared.	York Labour Party (Dave Merrett)
PMSID 0365/S/HREQ/1			The City also faces one of the highest increases in house prices and rents in the country and the plan fails to deal either with the failure to meet objective (government led) targets for new housing, nor makes any serious attempt to deal with affordability. Despite the warnings and legitimate concerns of many groups and individuals in the City the Council is proposing in the modifications to the Publication draft to reduce future housing provision further in the face of the economic, housing and social difficulties in the city. This is totally unsound public policy.	Rachael Maskell MP for York Central
PMSID 0365/S/HREQ/2			York has huge challenges in regards to general affordability of housing, affordable housing provision, inequality and low wages. The plan demonstrates no concern about this situation and clearly has no intention to 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. The overall homes target clearly does not meet the national direction of travel and is an artificial constraint on development. Given the shortage of homes of all types and York's position as the unaffordability capital of Yorkshire and Humberside these proposals are totally unjustified.	Rachael Maskell MP for York Central
PMSID 0365/S/HREQ/3			The programme of sites is heavily dependent on brownfield land and in the case of sites like York Central (ST5) there are severe development constraints or risks associated with all these sites. Planning permission has recently been granted for York Central (ST5) so some progress has been made but many hurdles remain. 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. Sites are 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 for York Central

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0365/S/HREQ/4			CYC policy is to give preference to, and only target 20% affordable on, brownfield sites (in contrast to 30% on greenfield). An analysis of 9 recent brownfield developments in the city shows an average affordable provision of 4%. The contribution to the City's housing needs is far below the 100% assumed in the plan. The greenfield supply is being artificially depressed in this plan and as a result the affordability problems particularly around family homes/houses will be maximized continuing to drive lower income households out of York. The inability of CYC to give figures on voids in new developments and to continue to represent the affordable target as 20% despite the evidence shows that the proposals are completely unjustifiable and fail to meet evidenced need.	Rachael Maskell MP for York Central
PMSID 0365/S/HREQ/5			It is not possible to separate the overall housing target from the target for affordable homes. The GL Hearn report maintains the shortage of affordable homes at 570 per annum as in 2018 (itself massively lower than the previous draft local plan figure). To meet this target CYC would have to make 72% of new developments affordable. This is plainly ludicrous given the dependence on privately owned land and the figures showing that current brownfield developments are yielding less than 5%. The Local Plan targets for affordable homes at 20% brownfield and 30% greenfield are missed across all developments and particularly on brownfield sites that are the Council's preferred option.	Rachael Maskell MP for York Central
PMSID 0365/S/HREQ/6			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. However we also advocated caution around ST36 Imphal barracks because of uncertainty; this has been ignored. Together these two sites create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments. In addition we advocated that sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are adhoc changes which have been reactively prepared.	Rachael Maskell MP for York Central
PMSID 0372/S/HREQ/1		Sound	Respondent supportive of Council's approach to housing requirements, they are concerned that an insufficient response is made to market signals with Council's decision to build 790 dpa	Gladman Developments (Craig Barnes) OBO Gladman Developments
PMSID 0376/S/HREQ/1		Not Sound	Lichfield assessment concludes that York's OAHN should be a minimum of 1,300 dpa rising to 1,585 dpa to address unmet demand from 2012-2017.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0376-2/S/HREQ/1		Not Sound	Lichfield assessment concludes that York's OAHN should be a minimum of 1,300 dpa rising to 1,585 dpa to address unmet demand from 2012-2017.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0378/S/HREQ/1		Not Sound	The modifications which reduce the Plan's housing requirement are 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. The 2016 based projections differ significantly from 2014 based projections, and are not representative of the economic and social characteristics and prospects of York; the 2014 projections are a more reliable base of assessing the City's OAN. There is no relevant precedent since September 2018 for York to use 2016 based projections, from a review of recent Inspectors findings. 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. In the case of York, it is not appropriate to slavishly adopt the 2016 projections without a critical understanding of whether these are appropriate or not. 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. NB: Critique of the Housing Needs Update supplied (Appendix 3).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.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0401/S/HREQ/1		Not Sound	Housing target set out in the submitted Plan is unsound, because it ignored the evidence, which included the reasons why a 10% buffer needed to be added. 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. As such, the submitted Plan is unsound, because the housing target was not based on the objectively assessed need identified within the evidence	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Mr and Mrs Sunderland and Wilson
PMSID 0581/S/HREQ/1		Not Sound	There 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. Given the relationship between planned housing and jobs growth and in light of the fact that York is a net importer of journeys to work, the Council should demonstrate at the Examination that its Duty to Co-operate partners are satisfied that the revised lower figure has no adverse implications for them and the range across boundary issues identified through the process to date.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0581/S/HREQ/2		Not Sound	Doubtful whether and how the Plan aligns future housing and jobs, an issue on which the publication version says nothing explicitly, but which is key to the Plan's soundness. Goes into further detail on this from 3.71 onwards, details assumptions on commuting, double jobbing, working age population, economic activity rates etc.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/HREQ/3		Not Sound	The 2019 Update on Housing Need (EX/CYC/9) is silent on York's housing market area and the implications for the HMA of the new evidence it considers. Examination must consider whether the lower OAN represents an appropriate response to tackling poor affordability in York and the HMA, whether it will support likely future employment growth in York and the HMA and whether it will provide the level of housing growth necessary to support future population growth in York and across the HMA. If not, whether this implies that unmet need may arise for York that could impact upon planned housing supply in neighbouring areas.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/HREQ/4		Not Sound	Serious doubts about using the 2016 population projections as the basis for predicting future need. Short term trends in terms of migration (both internal and international) and student numbers are not representative of York's recent past.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/HREQ/5		Not Sound	A lack of transparency about the assumptions used, which makes it difficult and in some respects impossible to determine the robustness of the figures. Since the Council is now relying on this evidence to underpin its Local Plan requirement, these are assumptions which should be available and tested in the Examination.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/HREQ/6		Not Sound	Justification for the use of SNPP 2016 as the basis for OAN which relies on very short-term trends in population data, fails to thoroughly consider the relationship between past trends and future population projections, and which does not recognise the role that an under-supply of housing have played in population growth / household formation.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0582/S/HREQ/1			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. Note PPG which states "Any method which relies on using the 2016 based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method." The implication of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. Based on the direction of travel it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews. 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.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson
PMSID 0583/S/HREQ/1			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. Note PPG which states "Any method which relies on using the 2016 based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method." The implication of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. Based on the direction of travel it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews. 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.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0585/S/HREQ/1		Not Sound	OAHN of 790 is not sound. Should use 2014 population projections not the 2016, OAHN of 790 does not match government ambition to build 300,000 homes a year. Lowering OAHN now will cause affordability to further worsen and will cause future OAHN to be higher.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0585/S/HREQ/2		Not Sound	OAHN of 790 is fundamentally flawed in terms of demographic baseline. The 2016-based household projections indicate a net household growth of 458 dpa between 2017 and 2033 (including a suitable allowance for vacant/second homes. Once a suitable adjustment has been made to rebase the projections to the (slightly higher) 2017 and 2018 Mid-Year Estimates (MYEs), and through the application of accelerated headship rates amongst younger age cohorts, takes the demographic starting point to 706 dpa. However, an analysis of the MYE estimates has raised significant concerns regarding the robustness of the international migration statistics underpinning the 2016-based Sub-National Population Projections (SNPP). Applying long term trends to international migration levels into York, which are more in line with net migration into the City, this would increase the demographic starting point to 921 dpa.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HREQ/3		Not Sound	OAHN of 790 is fundamentally flawed in terms of market signals uplift. GL Hearn uplift of 15% is in adequate. Affordability pressures have worsened, target must be benchmarked against the planned level of supply and the city's low housing delivery figures have been artificially boosted by the inclusion of student accommodation in the completion figures. In order to respond to both market signals and affordable housing need an uplift of 20% would be more appropriate.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HREQ/4		Not Sound	OAHN of 790 is fundamentally flawed in terms of affordable housing need. GL Hearn has not provided additional uplift for this. The scale of affordable housing needs, when considered as a proportion of market housing delivery, implies higher levels of need well above 1,105 dpa. It is considered that to meet affordable housing needs in full (573 dpa), the OAHN range should be adjusted to 1,910 dpa @ 30% of overall delivery. It is, however, recognised that this level of delivery is likely to be unachievable for York. Given the significant affordable housing need identified in City of York, Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of 1,215 dpa.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HREQ/5		Not Sound	OAHN of 790 is fundamentally flawed in terms of approach to student housing. Household projections explicitly exclude the housing needs of students living in communal establishments, GL Hearn has not adjusted the OAHN upwards to account for student growth.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HREQ/6		Not Sound	OAHN of 790 is fundamentally flawed in terms of approach to past under-delivery. It appears that the CoYC have included a very substantial amount of C2 student accommodation in the housing monitoring update figures, thus reducing the amount of shortfall they include in the annual housing target. Also appears to be over-estimation of dwellings provided and discrepancies between CYC's figures and those reported to MHCLG.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0587/S/HREQ/1		Not Sound	Consider OAHN of 790 to be inadequate. The 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.	ONEILL Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0587/S/HREQ/2		Not Sound	Calculates an alternative OAHN based off standard methodology of 1,070 dpa. Takes account of backlog, unimplemented permissions and windfalls to arrive at a OAHN figure of 17,097 over a 16 year plan period which is 1,069 dpa. Takes issue with the deliverability of some sites allocated, finds a 1,887 shortfall using council figures or a 2,902 shortfall using alternative assessment of need.	ONEILL Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0587/S/HREQ/3		Not Sound	Calculates two versions of five year land supply using council OAHN of 790 and alternative 1,070 dpa. Used Sedgefield method for backlog, applied 20% buffer given council would have failed housing delivery test for 6 of the last 7 years and takes account of unimplemented permissions. Considering just existing commitments gives a land supply of 1.48 years based on 1,070 dpa, their assumptions on backlog and commitments. Using council dpa of 790 with their assumptions on backlog, commitments and windfall gives a land supply of 3.34 years. 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.	ONEILL Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0587/S/HREQ/4		Not Sound	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. 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.	ONEILL Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0590/S/HREQ/1		Not Sound	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. Concerned that a 790dpa requirement will meet the needs of the city. NPPF is clear that LAs are encouraged to 'boost significantly' the supply of houses.	York and North Yorkshire Chamber of Commerce (Susie Cawood)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0592/S/HREQ/1		Not Sound	We consider that the Plan period should be moved forward to ensure development needs can be accommodated and to provide a green belt that will endure beyond due to the delays incurred in getting to this stage. We consider that CYCs assessment of housing requirement and allocations in the Plan to be inadequate 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.The governments approach of using a requirement of 1070 dpa is seen as reasonable not 790 dpa. Student housing should not be included in completions/unimplemented permissions. The Council's calculation of housing need is significantly flawed and, as a result the requirement for the Plan period in the Draft Plan falls nearly 7,500 units short of the more realistically assessed figure of 16,452 units. 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. The Plan will not secure Green Belt boundaries that will endure beyond the plan period and fails to achieve the clear imperative for the Council to "significantly boost the supply of housing." as required by the NPPF.	ONEILL Associates (Graeme Holbeck) OBO Yorvik Homes
PMSID 0594/S/HREQ/1		Not Sound	It is considered that the 2014-based household projection for York should represent the demographic starting point of housing need. This shows need for 849 dwellings per annum (dpa) once the Council's vacancy rate assumption has been applied. The Council's 15% market signals uplift should be applied to this figure, resulting in OAN of 976 dpa. However, the market signals uplift should also be considered in the context of the 30% market signals uplift applied under Standard Method, which results in overall need of 1,069 dpa.	PB Planning (Paul Butler) OBO TW Fields
PMSID 0601/S/HREQ/1		Not Sound	Approach taken by GL Hearn Housing Needs Update (January 2019) is not consistent in its approach to the preparation of the previous SHMA and addendum (May 2019) also by GL Hearn	DPP Planning (Claire Linley) OBO PJ Procter
PMSID 0604/S/HREQ/1		Not Sound	OAHN of 790 is not based on any robust objective assessment of need and does not match the evidence provided. 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. Plan is fundamentally unsound.	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)
PMSID 0607/S/HREQ/1		Not Sound	Object to PM5 Delivering Sustainable Growth for York - it is considered the proposed OAHN is not based on a robust assessment compliant with NPPF. (Reduction from 867dpa to 790dpa) Failing to meet full OAHN. Demographic baseline - 2016 household projections indicate growth of 458dpa (2017-33) once adjusted and applying headship rates takes starting point to 706 dpa. concerns are raised re international migration rates and corrected would result in 921dpa. market signals adjustment of 20% results in 1105dpa. Employment growth alignment firms up this figure. Adding Affordable housing and student need equates to an OAHN figure of 1300 dpa. plus unmet need 2012-17.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0609/S/HREQ/1		Not Sound	Object strongly to the further downward revisions in the housing numbers. These changes are unsound, and not justified by the evidence. significantly worsen a plan that already failed to provide enough housing of the right sort, and particular affordable / social housing for the future.	York and District Trades Union Council (Dave Merrett)
PMSID 0620/S/HREQ/1		Not Sound	Consider OAHN of 790 to be inadequate. The 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.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0620/S/HREQ/1		Not Sound	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.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0620/S/HREQ/2		Not Sound	Calculates an alternative OAHN based off standard methodology of 1,070 dpa. Takes account of backlog, unimplemented permissions and windfalls to arrive at a OAHN figure of 17,097 over a 16 year plan period which is 1,069 dpa. Takes issue with the deliverability of some sites allocated, finds a 1,887 shortfall using council figures or a 2,902 shortfall using alternative assessment of need.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0620/S/HREQ/3		Not Sound	Calculates two versions of five year land supply using council OAHN of 790 and alternative 1,070 dpa. Used Sedgfield method for backlog, applied 20% buffer given council would have failed housing delivery test for 6 of the last 7 years and takes account of unimplemented permissions. Considering just existing commitments gives a land supply of 1.48 years based on 1,070 dpa, their assumptions on backlog and commitments. Using council dpa of 790 with their assumptions on backlog, commitments and windfall gives a land supply of 3.34 years. 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.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0620/S/HREQ/4		Not Sound	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 our assumptions already assume a realistic rate of delivery from each site. There is only so much delivery the market can take or accept from each site. Increasing the amount of housing on the large strategic sites is likely to mean that more housing is delivered later in, or even after, the plan period and not in the early years of the plan. That rate of delivery is unlikely to increase without a fundamental adjustment to the business model of housebuilders and developers. Providing additional allocations that include sites such as the Galtres site that can deliver houses in the first 5 years of the plan period will greatly assist in addressing that shortfall.	Eamonn Keogh ONeill Associates OBO Galtres Village Development Company
PMSID 0621/S/HREQ/1		Not Sound	Revised housing figure (790) is unjustified and does not align with national planning guidance/methodology. Using 2014 household projections, with and Standard Methodology, overall need is 1,069dpa.	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PMSID 0841/S/HREQ/1		Not Sound	As pointed out by Ms Jukes in her submissions on behalf of Mr and Mrs Sunderland and Mr and Mrs Wilson, the proposed Modifications do not address the Inspectors' queries on housing need as set out in their initial letter to the Council of 24 July 2018. The decisions to reduce the housing requirement have been driven solely by the imperative of avoiding the need to allocate housing sites in various politically sensitive parts of the City. The decision to reduce the requirement is not based on evidence and is not therefore justified. Ms Jukes conclusions on soundness are supported	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0856/S/HREQ/1		Sound	Realistic projection of housing needs. Absence of plan means development will be piecemeal. Plan is critical to sustain heritage and character. Plan consistent but housing types within location are too open. Place making should be more adhered to ensure communities rather than apartments on the outskirts.	John Young
PMSID 0886/S/HREQ/1		Not Sound	The City also faces one of the highest increases in house prices and rents in the country and the plan fails to deal either with the failure to meet objective (government led) targets for new housing, nor makes any serious attempt to deal with affordability. Despite the warnings and legitimate concerns of many groups and individuals in the City the Council is proposing in the modifications to the Publication draft to reduce future housing provision further in the face of the economic, housing and social difficulties in the city. This is totally unsound public policy.	York Labour Group (Dave Merrett)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0886/S/HREQ/2		Not Sound	York has huge challenges in regards to general affordability of housing, affordable housing provision, inequality and low wages. The plan demonstrates no concern about this situation and clearly has no intention to 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. The overall homes target clearly does not meet the national direction of travel and is an artificial constraint on development. Given the shortage of homes of all types and York's position as the unaffordability capital of Yorkshire and Humberside these proposals are totally unjustified.	York Labour Group (Dave Merrett)
PMSID 0886/S/HREQ/3		Not Sound	The programme of sites is heavily dependent on brownfield land and in the case of sites like York Central (ST5) there are severe development constraints or risks associated with all these sites. Planning permission has recently been granted for York Central (ST5) so some progress has been made but many hurdles remain. 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. Sites are 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	York Labour Group (Dave Merrett)
PMSID 0886/S/HREQ/4		Not Sound	CYC policy is to give preference to, and only target 20% affordable on, brownfield sites (in contrast to 30% on greenfield). An analysis of 9 recent brownfield developments in the city shows an average affordable provision of 4%. The contribution to the City's housing needs is far below the 100% assumed in the plan. The greenfield supply is being artificially depressed in this plan and as a result the affordability problems particularly around family homes/houses will be maximized continuing to drive lower income households out of York. The inability of CYC to give figures on voids in new developments and to continue to represent the affordable target as 20% despite the evidence shows that the proposals are completely unjustifiable and fail to meet evidenced need.	York Labour Group (Dave Merrett)
PMSID 0886/S/HREQ/5		Not Sound	It is not possible to separate the overall housing target from the target for affordable homes. The GL Hearn report maintains the shortage of affordable homes at 570 per annum as in 2018 (itself massively lower than the previous draft local plan figure). To meet this target CYC would have to make 72% of new developments affordable. This is plainly ludicrous given the dependence on privately owned land and the figures showing that current brownfield developments are yielding less than 5%. The Local Plan targets for affordable homes at 20% brownfield and 30% greenfield are missed across all developments and particularly on brownfield sites that are the Council's preferred option.	York Labour Group (Dave Merrett)
PMSID 0886/S/HREQ/6			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. However we also advocated caution around ST36 Imphal barracks because of uncertainty; this has been ignored. Together these two sites create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments. In addition we advocated that sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are adhoc changes which have been reactively prepared.	York Labour Group (Dave Merrett)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0890/S/HREQ/1		Not Sound	OAHN of 790 is not sound. Should use 2014 population projections not the 2016, OAHN of 790 does not match government ambition to build 300,000 homes a year. Lowering OAHN now will cause affordability to further worsen and will cause future OAHN to be higher.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0891/S/HREQ/1		Not Sound	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. Note PPG which states "Any method which relies on using the 2016 based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method." The implication of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. Based on the direction of travel it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews. 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.	Johnson Mowatt (Mark Johnson) OBO Redrow Homes
PMSID 0894/S/HREQ/1		Not Sound	The plan fails to meet the minimum assessed development need and is overly confident in large strategic allocations delivering a high number of units in a relatively small window of time. A 952 dpa would have been justified by evidence base (the SHMA), officer recommendations and statements of case by many representatives. The approach take (790) was unjustified and a key indicator of the Council's unreasonable and unrealistic approach to assessing housing need.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0894/S/HREQ/2		Not Sound	Should the inspector consider it reasonable to retain a SHMA based OAHN figure, it's suggested that the 2017 update and GL Hearn conclusion that includes an uplift of affordable housing be used as a starting point. Though under reporting the city's need this would ensure an OAHN of 953 dpa.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0895/S/HREQ/1		Not Sound	The plan fails to meet the minimum assessed development need and is overly confident in large strategic allocations delivering a high number of units in a relatively small window of time	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/HREQ/2		Not Sound	Should the inspector consider it reasonable to retain a SHMA based OAHN figure, it's suggested that the 2017 update and GL Hearn conclusion that includes an uplift of affordable housing be used as a starting point. Though under reporting the city's need this would ensure an OAHN of 953 dpa.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0913 - 2/S/HREQ/1		Not Sound	ST4: Land Adj Hull Road - The council has exaggerated its housing requirement so this site is no longer required.	Sally Hawkswell

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0916/S/HREQ/1			The spatial strategy fails to take into account a realistic objectively assessed housing need and other development land requirements leading to a lack of developable land outside the proposed green belt.	Carter Jonas (Simon Grundy) OBO Schoen Clinic York Ltd/ The Retreat Living
Proposed Modification				
PMSID 0125/Mod/HREQ/1			Demographic baseline for OAHN should be 921 dpa.	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HREQ/2			GL Hearn's uplift is 15%. However, Lichfields considers that a greater uplift of at least 20% would be more appropriate in this instance. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for 1,105 dpa.	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HREQ/3			Given the significant affordable housing need identified in City of York, Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of 1,215 dpa.	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HREQ/4			It is calculated that meeting the growth needs of educational establishments in the city would equate to around 1,346 dwellings over the 16-year Plan period, at an average of 84 dpa on top of the 1,215 dpa set out above in respect of affordable housing need (i.e. 1,299 dpa).	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HREQ/5			Serious concerns about how CYC have calculated past housing delivery. Based on GL Hearn's OAHN of 790 dpa, and applying the MHCLG delivery figures, this suggests that an additional 153 dpa should be added on to the OAHN over the course of the 2017 to 2033 Plan period to address the backlog in full. If Lichfields' higher OAHN of 1,300 dpa is applied, this would result in a figure of 285 dpa to be factored on top.	Persimmon Homes (Jess Kiely)
PMSID 0181/Mod/HREQ/1			HBF supports an annual provision of 1070 new dwellings pa over the Plan period and we support that figure.	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0182/Mod/HREQ/1			In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd
PMSID 0182/Mod/HREQ/2			Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd
PMSID 0182/Mod/HREQ/3			Allocate further sites for development and as safeguarded land. Include alt site 942 Land to the West of Chapelfield, 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.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd
PMSID 0182/Mod/HREQ/4			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.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd
PMSID 0210/Mod/HREQ/1			Council to revisit evidence base for OAHN and take on board respondent's analysis for a higher OAHN plus the unmet need between 2012-2017	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0214/Mod/HREQ/1			The housing requirement figure for the Plan Period should be increased to at least 1,100 dwellings per annum.	ONEill Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0220/Mod/HREQ/1			A figure of 1070 dpa should be used as the housing requirement - The governments approach of using a requirement of 1070 dpa is seen as reasonable not 790 dpa. Student housing should not be included in completions/unimplemented permissions. The Council's calculation of housing need is significantly flawed and, as a result the requirement for the Plan period in the Draft Plan falls nearly 7,500 unitsshort of the more realistically assessed figure of 16,452 units.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0231/Mod/HREQ/1			In the absence of better evidence, considers that the OAHN should be based upon the demographic starting point (484dpa) plus 10% for market signals. This would give a total OAHN of 532dpa.	Fulford Parish Council (Rachel Robinson)
PMSID 0253/Mod/HREQ/1			CYC should revisit the evidence base that underpins the minimum housing requirement of 790 dpa. Taking on board Lichfield's analysis that results in a figure in the region of 1300 dpa (plus housing backlog). CYC should as a result identify additional housing sites to meet the shortfall. The 5 YHLS assumptions should be revisited to ensure they are robust.	Litchfields (Alastair Willis) OBO Bellway Homes
PMSID 0255/Mod/HREQ/1			Change housing requirement from 790dpa to 1070 dpa - 'deliver a minimum provision of 1070 new dwellings over the Plan period to 2037/38. This will enable the building of strong sustainable communities through addressing the housing and community needs of York's current and future population'.	Home Builders Federation (Joanne Harding)
PMSID 0260/Mod/HREQ/1			Revise OAHN figure upwards to at least 1,000 dwellings p/a.	Pegasus Group (Emma Ridley) OBO Level Developmensts Ltd
PMSID 0301/Mod/HREQ/1			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.	Copmanthorpe Parish Council (Robert West)
PMSID 0339/Mod/HREQ/1			The 2014-based household projection for York should represent the demographic starting point of housing need. This shows need for 849 dwellings per annum (dpa) once the Council's vacancy rate assumption has been applied. The Council's 15% market signals uplift should be applied to this figure, resulting in OAN of 976 dpa. However, the market signals uplift should also be considered in the context of the 30% market signals uplift applied under Standard Method, which results in overall need of 1,069 dpa.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0345/Mod/HREQ/1			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. 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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0350/Mod/HREQ/1			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.	Carter Jonas (Simon Grundy) OBO Picton Capital
PMSID 0357/Mod/HREQ/1			To be consistent with national policy the OAN should revert to the 867 dpa requirement but with the addition of the recommended market signals uplift to 953 dpa. The proposed reduction in OAN is unjustified bearing in mind the Governments decision not to use the 2016-based projections for the standard method. If the OAN is not increased to reflect the evidence it is maintained that additional sites should be identified to meet the need for older person housing	ID Planning (Richard Irving) OBO Green Developments
PMSID 0364/Mod/HREQ/1			If the city were to retain the target at the previous government recommended level of 1070 and produced a better balance of brownfield/greenfield provision could mean a significant additional number of affordable homes could be provided. The Council shows no will to change the housing strategy, the target nor the approach to procurement and partnership.	York Labour Party (Dave Merrett)
PMSID 0365/Mod/HREQ/1			If the city were to retain the target at the previous government recommended level of 1070 and produced a better balance of brownfield/greenfield provision could mean a significant additional number of affordable homes could be provided. The Council shows no will to change the housing strategy, the target nor the approach to procurement and partnership.	Rachael Maskell MP for York Central
PMSID 0372/Mod/HREQ/1			Respondent considers that, at the very least, a housing requirement of 867 dpa should be maintained through the Local Plan	Gladman Developments (Craig Barnes) OBO Gladman Developments
PMSID 0376/Mod/HREQ/1			Respondent would like further housing allocations identified with more land released from the Green Belt to meet adjusted housing figures (refer Lichfield report) and ensure sufficient flexibility so that the plan is deliverable.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/Mod/HREQ/2			Respondent suggests that the proposed housing requirement be significantly increased in line with recommendations of the Lichfields report. York's OAHN should be a minimum of 1,300 dpa, with an annual housing target rising to between 1,585 dpa to deal with unmet need 2012-2017.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0376-2/Mod/HREQ/2			Respondent suggests that the proposed housing requirement be significantly increased in line with recommendations of the Lichfields report. York's OAHN should be a minimum of 1,300 dpa, with an annual housing target rising to between 1,585 dpa to deal with unmet need 2012-2017.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376-2/Mod/HREQ/3			To make Policy H1 sound sufficient housing allocations should be identified to meet the housing requirement outlined in the Lichfield report and also include development land in which the respondent has an interest at Manor Heath Road, Copmanthorpe (ST12).	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/Mod/HREQ/3			To make Policy H1 sound sufficient housing allocations should be identified to meet the housing requirement outlined in the Lichfield report and also include development land in which the respondent has an interest at Galtres Farm (sites 891 & 922).	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0378/MOD/HREQ/1			In order to make the Plan sound, the housing requirements within the Plan 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 when accounting for appropriate adjustments to reflect employment growth. Detail provided in critique of the Housing Needs Update (appendix 3)	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0401/Mod/HREQ/1			Plan should use evidence from 2016 SHMA GL Hearn report. Use that OAHN of 867 dwellings p/a to meet true need and fulfil duty to cooperate obligations.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Mr and Mrs Sunderland and Wilson
PMSID 0581/Mod/HREQ/1			The minimum OAN for York should be 1,026 dpa, a level of housing growth that would support future employment growth and has the potential to deliver significantly higher levels of affordable housing. This would represent an appropriate uplift in response to both market signals and lack of affordable housing.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0581/Mod/HREQ/2			The Council has opted for an OAN based on jobs growth of 650 per annum, 2017- 37. However, its own Employment Land Review makes it clear that proposed employment land requirements should enable the city to deliver jobs growth of 806 per annum. This higher figure is described as being no less accurate a view of future jobs than 650 per annum, and it should provide the basis for aligning future jobs and housing. The modelling allows for additional net migration to York to meet a significant shortfall in resident workers implied by the 2016-based projections. However, this may understate the housing need to support 650 jobs per annum, which our analysis suggests should be 814 dpa. For the higher jobs growth figure of 806 per annum, the resident labour shortfall is larger, and this implies housing need figures of 855-891 dpa.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/Mod/HREQ/3			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.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0582/Mod/HREQ/1			In order to make the Plan sound, it is recommended that the housing requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson
PMSID 0583/Mod/HREQ/1			In order to make the Plan sound, it is recommended that the housing requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0585/Mod/HREQ/1			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.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HREQ/2			In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0585/Mod/HREQ/3			Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HREQ/4			Demographic baseline for OAHN should be 921 dpa.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HREQ/5			GL Hearn's uplift is 15%. However, Lichfields considers that a greater uplift of at least 20% would be more appropriate in this instance. When applied to the 921 dpa re-based demographic starting point, this would indicate a need for 1,105 dpa.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HREQ/6			Given the significant affordable housing need identified in City of York, Lichfields considers that a further 10% uplift would be appropriate in this instance and should be applied to the OAHN, resulting in a figure of 1,215 dpa.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HREQ/7			It is calculated that meeting the growth needs of educational establishments in the city would equate to around 1,346 dwellings over the 16-year Plan period, at an average of 84 dpa on top of the 1,215 dpa set out above in respect of affordable housing need (i.e. 1,299 dpa).	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HREQ/8			Serious concerns about how CYC have calculated past housing delivery. Based on GL Hearn's OAHN of 790 dpa, and applying the MHCLG delivery figures, this suggests that an additional 153 dpa should be added on to the OAHN over the course of the 2017 to 2033 Plan period to address the backlog in full. If Lichfields' higher OAHN of 1,300 dpa is applied, this would result in a figure of 285 dpa to be factored on top.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0587/Mod/HREQ/1			The housing requirement figure for the Plan Period should be increased to at least 1,100 dwellings per annum.	O'Neill Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0592/Mod/HREQ/1			A figure of 1070 dpa should be used as the housing requirement - The governments approach of using a requirement of 1070 dpa is seen as reasonable not 790 dpa. Student housing should not be included in completions/unimplemented permissions. The Council's calculation of housing need is significantly flawed and, as a result the requirement for the Plan period in the Draft Plan falls nearly 7,500 units short of the more realistically assessed figure of 16,452 units.	Oneill Associates (Graeme Holbeck) OBO Yorvik Homes
PMSID 0594/Mod/HREQ/1			It is considered that the 2014-based household projection for York should represent the demographic starting point of housing need. This shows need for 849 dwellings per annum (dpa) once the Council's vacancy rate assumption has been applied. The Council's 15% market signals uplift should be applied to this figure, resulting in OAN of 976 dpa. However, the market signals uplift should also be considered in the context of the 30% market signals uplift applied under Standard Method, which results in overall need of 1,069 dpa.	PB Planning (Paul Butler) OBO TW Fields
PMSID 0594/Mod/HREQ/2			The evidence maintains our previously presented case for the release of additional land as housing allocations within the emerging CYC Local Plan in order to meet the City's full objectively assessed housing needs, such as an extension of our client's Osbaldwick site to deliver at least 975 homes.	PB Planning (Paul Butler) OBO TW Fields
PMSID 0598/Mod/HREQ/1			Use 2014 projections rather than 2016, revise OAHN to 1,150 in response to market signals and lack of affordable housing.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0600/Mod/HREQ/1			Use 2014 projections rather than 2016, revise OAHN to 1,150 in response to market signals and lack of affordable housing.	DPP (Mark Lane) OBO Shepherd Homes
PMSID 0601/Mod/HREQ/1			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.	DPP Planning (Claire Linley) OBO PJ Procter
PMSID 0603/Mod/HREQ/1			CYC should adopt a more appropriate Local Housing Need figure of between 997 & 1080 dpa	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0603/Mod/HREQ/2			CYC need to ensure the delivery of growth does not stall through insufficient site allocations as a result of the reduced housing target.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0604/Mod/HREQ/1			Revise OAHN figure upwards to 1,069 dwellings p/a.	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)
PMSID 0607/Mod/HREQ/1			Revisit the evidence base that underpins the minimum housing requirement of 790 dpa and take on board Lichfield's analysis resulting in a 1300 dpa plus an unmet need between 2012-17 of 285 dpa. Identify additional housing sites to meet the significant shortfall. Revisit delivery assumptions and lead in times to ensure more robust approach.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0609/Mod/HREQ/1			Note that the Council does not follow Government Guidance to use the existing NPPF rules applicable at the time of submission. Continue to strongly support a new Local Plan to deliver at least the Government's previously estimated 1070 houses a year, with a higher proportion of that total being delivered as affordable and social housing, particularly for families, with stronger policies and/or dedicated land allocations to deliver that.	York and District Trades Union Council (Dave Merrett)
PMSID 0651/Mod/HREQ/1			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.	David Carr
PMSID 0866/Mod/HREQ/1			Use 2014 projections rather than 2016, revise OAHN to 1,150 in response to market signals and lack of affordable housing.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0867/Mod/HREQ/1			Use 2014 projections rather than 2016, revise OAHN to 1,150 in response to market signals and lack of affordable housing.	DPP (Mark Lane) OBO Yorvik Homes
PMSID 0869-3/Mod/HREQ/1			To ensure the estimated yields based on the Viability Study and Policy H2 are not exceeded then safeguards should be put in place.	Ray Calpin

8. Plan-wide Theme - York's Future Housing Requirement

Housing Requirements				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0886/Mod/HREQ/1			If the city were to retain the target at the previous government recommended level of 1070 and produced a better balance of brownfield/greenfield provision could mean a significant additional number of affordable homes could be provided. The Council shows no will to change the housing strategy, the target nor the approach to procurement and partnership.	York Labour Group (Dave Merrett)
PMSID 0890/Mod/HREQ/1			In order to make the Local Plan sound, it is recommended that the Housing Requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0890/Mod/HREQ/2			Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0890/Mod/HREQ/3			Allocate further sites for development and as safeguarded land. Include alt site 737 Stock Hill Field, West of Church Balk, Dunnington 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.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0890/Mod/HREQ/4			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.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0891/Mod/HREQ/1			In order to make the Plan sound, it is recommended that the housing requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowatt (Mark Johnson) OBO Redrow Homes
PMSID 0894/Mod/HREQ/3			The 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.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0895/Mod/HREQ/3			The 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.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0918- 1/Mod/HREQ/1			Use the Department of Communities and Local Government method for OAHN figures.	Robert Pilcher

8. Plan-wide Theme - York's Future Housing Requirement

Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0160/ LC/HNU/1			Considers document to be legally compliant and that it complies with the duty to cooperate	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0372/LC/HNU/1	Yes		Respondent supports OAHN use of the 2016 household projections under the policies of the 2012 NPPF.	Gladman Developments (Craig Barnes) OBO Gladman Developments
PMSID 0917- 2/LC/HNU/1	No		CYC is too dependent on a unrealistically high level of windfall development as these sites have been worked out far more than average. 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. The windfall rates will dwindle and the delivery rates will fall below the requirements of the housing delivery test..	Thomas Pilcher
Soundness				
PMSID 0091/S/HNU/1		Not Sound	Draft Policy H1 allocates only 40 sites to meet the OAN of York (19 of which are large sites >100 homes, 9 of which are Strategic Sites) Significant infrastructure and master planning will result in delays to these types of site and we question the deliverability of a consistent 5 yr housing land supply to ensure choice and completion. A better approach would be to allocate a wider range of smaller sites. The Plan therefore fails to be effective and is not considered sound	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0181/S/HNU/1		Not Sound	Proposed Mods reduces housing requirement to 790pa and relies on the Housing Needs Update of January 2019 to reduce from 867pa. This is not a proper basis for reduction as the update is fundamentally based on 2016 Sub-National Population Projections and is entirely inconsistent with the Governments approach that maintains commitment to boosting housing levels at national basis and delivering 300k pa. The 2016 figures are prepared by ONS that uses more limited data compared to previous figures. This is a flawed approach. PPG requires the 2014 based household projections to be used for the standard method. CYC does not have a 5 year housing supply. HBF supports an annual provision of 1070 new dwellings pa over the Plan period and we support that figure.	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments

8. Plan-wide Theme - York's Future Housing Requirement

Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0210/S/HNU/1		Not Sound	Respondent considers the Housing Needs Update as flawed. Demographic, market signals, employment growth, affordable and student housing need, shortfall of housing, have all been underestimated thereby leading to a higher OAHN estimate by respondent of 1300 (+285).	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0255/S/HNU/1		Not Sound	Object to the housing requirement has been amended to 790dpa based on the HNU 2019 that has been produced to reflect the 2016 based sub-national population and household projections from ONS and CLG. Numbers of older people and younger peoples household formation rates are not set to grow as previously anticipated. ONS have stated 'household projections are not a prediction or forecast of how many houses should be built in the future'. Latest household projections will continue the trend of young people forming households much later in life than in previous years. Help to Buy has been brought in to try to address this issue. However, the Govt. aim of 300k dpa will not be achieved using the 2016 projections. PPG sets out how to undertake a Housing Needs Assessment through a standard method - requiring the continued use of the 2014 based projections.	Home Builders Federation (Joanne Harding)
PMSID 0286/S/HNU/1		Not Sound	CYC revised OAHN figure of 790 dpa for duration of Local Plan but ignored National Statistics Population Forecast (Sept. 2018) indicating a requirement of 480 dpa. This would allow the proposed density on allocated housing sites ST31 & H29 to be reduced to those in the emerging Copmanthorpe Neighbourhood Plan,	John Martin Pickard
PMSID 0287/S/HNU/1		Not Sound	CYC revised OAHN figure of 790 dpa for duration of Local Plan but ignored National Statistics Population Forecast (Sept. 2018) indicating a requirement of 480 dpa. This would allow the proposed density on allocated housing sites ST31 & H29 to be reduced to those in the emerging Copmanthorpe Neighbourhood Plan,	Katherine Pickard
PMSID 0345/S/HNU/1		Not Sound	Both the modification (to 790dpa) and the 867dpa specified in the Submission Plan are unsound. CYC has shifted the demographic based starting point from the 2014 based to 2016 based projections, which significantly reduce the projected growth in population and households up to 2032. The use of the 2016 based projections does not form a credible position and the demographic starting point should be rebased to the 2014 projections. The Plan appears likely to underestimate need for homes to the detriment of both the economy and sustainable development objectives. 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. 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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0357/S/HNU/1		Not Sound	<p>Object to the proposed reduction in the OAN from 867 to 790 dwellings pa. The Housing Needs Update Paper (Jan 2019) proposes a reduction based on using a partial return to trend of headship rates and adjusting the population projections to achieve the expected growth in jobs. The 867 figure was based solely on the 2014 based household projections, a 10% uplift for market signals was recommended but not accepted by Council members. Nowhere in the Jan 2019 Housing Needs update is there a table showing the method used to achieve 867 dpa with a comparison as to what figure the 2016-based projections would derive. This surely should have been the starting point. It is clear that two completely different approaches were used.</p> <p>The 2016-based household projections would not achieve nationally the Government target of 300k homes pa it is clearly not fit for purpose and the lower OAN figure for York is unjustified. The Submitted OAN figure of 867 dpa should remain the starting point but increased by 10% for market uplift (as recommended) a minimum of 953 dpa therefore should be used. Using the standard method calculates an OAN of 1057 dpa an upward rather than downward figure.</p>	ID Planning (Richard Irving) OBO Green Developments
PMSID 0372/S/HNU/1		Sound	Respondent supports OAHN use of the 2016 household projections under the policies of the 2012 NPPF.	Gladman Developments (Craig Barnes) OBO Gladman Developments
PMSID 0376/S/HNU/1			The Lichfield report raises concerns how Council has calculated the 5 year housing land supply, including shortfall and their ability to deliver sufficient land over the first 5 years the over the period of an adopted Local Plan. Further sites should be identified and released from the Green Belt to ensure sufficient flexibility and deliverability of the plan.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376-2/S/HNU/1			The Lichfield report raises concerns how Council has calculated the 5 year housing land supply, including shortfall and their ability to deliver sufficient land over the first 5 years the over the period of an adopted Local Plan. Further sites should be identified and released from the Green Belt to ensure sufficient flexibility and deliverability of the plan.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd

8. Plan-wide Theme - York's Future Housing Requirement

Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0378/S/HNU/1		Not Sound	The assessment of the City's OAN is 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. The 2016 based projections differ significantly from 2014 based projections, and are not representative of the economic and social characteristics and prospects of York; the 2014 projections are a more reliable base of assessing the City's OAN. There is no relevant precedent since September 2018 for York to use 2016 based projections, from a review of recent Inspectors findings. 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. In the case of York, it is not appropriate to slavishly adopt the 2016 projections without a critical understanding of whether these are appropriate or not. 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. NB submitted critique of GL Hearn HNU, including recommendations for CYC Local Plan (Appendix 3).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.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0582/S/HNU/1			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. Note PPG which states "Any method which relies on using the 2016 based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method." The implication of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. Based on the direction of travel it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews. 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.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson

8. Plan-wide Theme - York's Future Housing Requirement

Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0583/S/HNU/1			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. Note PPG which states "Any method which relies on using the 2016 based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method." The implication of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. Based on the direction of travel it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews. 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.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0590/S/HNU/1		Not Sound	In response to earlier queries to the housing requirement from Inspectors CYC commissioned another update to the OAN and arrived at 790 dpa. Based on Sub national Population Projections and 2016 Household Projections. This figure is inadequate as the 2016 populations and household projections are contrary to Govt Guidance, housing need calculation is too low. 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 - particularly in the case of authorities in transitional arrangements (such as York). Shortcomings of the 2016 projections are highlighted in the SHMA and on issue of affordability it is more damning stating 'a significant worsening of affordability' and 'York is becoming more unaffordable and that a markets signals adjustment ..is necessitated'. The SHMA promotes low housing requirement contradicting the need for a boost to supply.	York and North Yorkshire Chamber of Commerce (Susie Cawood)
PMSID 0598/S/HNU/1		Not Sound	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.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0598/S/HNU/2		Not Sound	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. Increasingly apparent affordability issues in York should have lead to bigger uplift.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0598/S/HNU/3		Not Sound	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. 15% uplift should have been applied to the economics led housing need of 790 dwellings p/a.	DPP (Mark Lane) OBO Linden Homes Strategic Land

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Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0598/S/HNU/4		Not Sound	Jan 2019 Housing Needs Update and the economic led housing need scenario only covers the plan period from 2014 until 2031. By contrast the Local Plan covers up until 2032/33 and sets Green Belt for post-plan period up to 2038 so it remains permanent. Figure of 790 in the proposed modifications does not address the correct plan period or meet the housing need.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0598/S/HNU/5		Not Sound	Proposed figure of 790 dwelling per annum does not consider past under-delivery.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0600/S/HNU/1		Not Sound	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.	DPP (Mark Lane) OBO Shepherd Homes
PMSID 0600/S/HNU/2		Not Sound	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. Increasingly apparent affordability issues in York should have lead to bigger uplift.	DPP (Mark Lane) OBO Shepherd Homes
PMSID 0600/S/HNU/3		Not Sound	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. 15% uplift should have been applied to the economics led housing need of 790 dwellings p/a.	DPP (Mark Lane) OBO Shepherd Homes
PMSID 0600/S/HNU/4		Not Sound	Jan 2019 Housing Needs Update and the economic led housing need scenario only covers the plan period from 2014 until 2031. By contrast the Local Plan covers up until 2032/33 and sets Green Belt for post-plan period up to 2038 so it remains permanent. Figure of 790 in the proposed modifications does not address the correct plan period or meet the housing need.	DPP (Mark Lane) OBO Shepherd Homes
PMSID 0600/S/HNU/5		Not Sound	Proposed figure of 790 dwelling per annum does not consider past under-delivery.	DPP (Mark Lane) OBO Shepherd Homes
PMSID 0601/S/HNU/2		Not Sound	Respondent considers that the evidence base, upon which the Proposed Modifications are formulated, to be unsound in that that it is not positively prepared and does not meet the area's development needs. 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.	DPP Planning (Claire Linley) OBO PJ Procter

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Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0603/S/HNU/4		Not Sound	Further development allocations and safeguarded sites are needed because a majority of brown field sites identified and upon which CYC is heavily reliant do not have planning permission and therefore deliverability is questionable	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0621/S/HNU/1		Sound	2014 based MHCLG household projections should take preference to the 2016 based ONS household projections, following the Government's Standard Method.	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PMSID 0866/S/HNU/1		Not Sound	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.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0866/S/HNU/2		Not Sound	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. Increasingly apparent affordability issues in York should have lead to bigger uplift.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0866/S/HNU/3		Not Sound	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. 15% uplift should have been applied to the economics led housing need of 790 dwellings p/a.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0866/S/HNU/4		Not Sound	Jan 2019 Housing Needs Update and the economic led housing need scenario only covers the plan period from 2014 until 2031. By contrast the Local Plan covers up until 2032/33 and sets Green Belt for post-plan period up to 2038 so it remains permanent. Figure of 790 in the proposed modifications does not address the correct plan period or meet the housing need.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0866/S/HNU/5		Not Sound	Proposed figure of 790 dwelling per annum does not consider past under-delivery.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0867/S/HNU/1		Not Sound	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.	DPP (Mark Lane) OBO Yorvik Homes

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Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0867/S/HNU/2		Not Sound	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. Increasingly apparent affordability issues in York should have lead to bigger uplift.	DPP (Mark Lane) OBO Yorvik Homes
PMSID 0867/S/HNU/3		Not Sound	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. 15% uplift should have been applied to the economics led housing need of 790 dwellings p/a.	DPP (Mark Lane) OBO Yorvik Homes
PMSID 0867/S/HNU/4		Not Sound	Jan 2019 Housing Needs Update and the economic led housing need scenario only covers the plan period from 2014 until 2031. By contrast the Local Plan covers up until 2032/33 and sets Green Belt for post-plan period up to 2038 so it remains permanent. Figure of 790 in the proposed modifications does not address the correct plan period or meet the housing need.	DPP (Mark Lane) OBO Yorvik Homes
PMSID 0867/S/HNU/5		Not Sound	Proposed figure of 790 dwelling per annum does not consider past under-delivery.	DPP (Mark Lane) OBO Yorvik Homes
PMSID 0891/S/HNU/1			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. Note PPG which states "Any method which relies on using the 2016 based household projections will not be considered to be following the standard method... it is not considered that these projections provide an appropriate basis for use in the standard method." The implication of fixing a housing requirement via the Local Plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation. Based on the direction of travel it is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews. 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.	Johnson Mowatt (Mark Johnson) OBO Redrow Homes
PMSID 0894/S/HNU/1		Not Sound	Council is going against national policy by using the 2016 household projection figures instead of the 2014 data which the respondent believes is not the most appropriate or reasonable strategy to plan for growth. The 2014 household projection figures should be used alongside the standard methodology, including affordable housing need, which highlights a substantial uplift in housing demand above what the draft modifications are proposing	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0894/S/HNU/2		Not Sound	Not consistent with national policy regarding the plan making process	Carter Jonas (Simon Grundy) OBO Karbon Homes

8. Plan-wide Theme - York's Future Housing Requirement

Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0894/S/HNU/3		Not Sound	CYC must allocate more housing land to ensure the plan is prepared in a positive and effective manner in line with national policy. Additional allocations will ensure the plan is robust and will meet the required growth throughout the entire plan period.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0894/S/HNU/5		Not Sound	The latest 2019 'update' to the SHMA uses data produced from those previous iterations and can only be considered to be flawed	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0894/S/HNU/6		Not Sound	Conflict in Council's approach to use up-to-date data, but not the most recent national policy ad guidance. Tensions created by Council's approach can be disregarded if the SHMA is set in preference for the Standard Methodology	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0895/S/HNU/1		Not Sound	Deliverability of these sites is doubtful. NPPF places emphasis on plans having a diverse pool of sites that can come forward at various times throughout the plan to ensure a balanced housing market.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/HNU/2		Not Sound	Not consistent with national policy regarding the plan making process	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/HNU/3		Not Sound	CYC must allocate more housing land to ensure the plan is prepared in a positive and effective manner in line with national policy. Additional allocations will ensure the plan is robust and will meet the required growth throughout the entire plan period.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/HNU/4		Not Sound	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.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/HNU/5		Not Sound	The latest 2019 'update' to the SHMA uses data produced from those previous iterations and can only be considered to be flawed	Carter Jonas (Simon Grundy) OBO Banks Property Ltd

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Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0895/S/HNU/6		Not Sound	Conflict in Council's approach to use up-to-date data, but not the most recent national policy and guidance. Tensions created by Council's approach can be disregarded if the SHMA is set in preference for the Standard Methodology	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/HNU/7		Not Sound	Council is seeking 790 dpa. Respondent considered contents and methodology of the Green Belt review and suggests it's appropriate to exclude Malton Road (H50) from the Green Belt. Significant shortfall of new housing and poor delivery of new homes coupled with Council's poor evidence base, highly subjective green belt review and unrealistic OAHN makes the draft Local Plan unsound.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0917-2/S/HNU/1		Not Sound	Plan does not seek to deliver or surpass the OAN and the evidence does not justify the sites selected. It 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.	Thomas Pilcher

Proposed Modification

PMSID 0210/Mod/HNU/1			Identify additional housing sites to meet the significant shortfall in housing need (between 2012 - 2017)	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0286/Mod/HNU/1			A reduction in housing densities of sites ST31 & H29 to 70 & 65 respectively is justified by the evidence.	John Martin Pickard
PMSID 0287/Mod/HNU/1			A reduction in housing densities of sites ST31 & H29 to 70 & 65 respectively is justified by the evidence.	Katherine Pickard
PMSID 0350-2/Mod/HNU/1			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 of 953 dpa.	Carter Jonas (Simon Grundy) OBO Picton Capital
PMSID 0350-2/Mod/HNU/2			The SHLAA should be reviewed to update the plan and include a limited number of additional sites.	Carter Jonas (Simon Grundy) OBO Picton Capital

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Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0372/Mod/HNU/1			Findings of 2016 household projections should be subject to a sensitivity test with sufficient adjustments made as a result.	Gladman Developments (Craig Barnes) OBO Gladman Developments
PMSID 0376/Mod/HNU/1			Revise demographic baseline from 458 to 921 to account for 2017/2018 MYEs and long term international migration.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376- 2/Mod/HNU/1			Revise demographic baseline from 458 to 921 to account for 2017/2018 MYEs and long term international migration.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/Mod/HNU/2			Market signals adjustment should be raised to 20% to be more appropriate	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376- 2/Mod/HNU/2			Market signals adjustment should be raised to 20% to be more appropriate	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/Mod/HNU/3			Employment growth alignment is to be raised by adjustment of demographic baseline.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376- 2/Mod/HNU/3			Employment growth alignment is to be raised by adjustment of demographic baseline.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd

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Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0376-2/Mod/HNU/4			An affordable housing target of 30% uplift the respondent believes is not achievable so proposes a 10% uplift	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/Mod/HNU/4			An affordable housing target of 30% uplift the respondent believes is not achievable so proposes a 10% uplift	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/Mod/HNU/5			Respondent believes that a further 84 dpa is required for providing student accommodation.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376-2/Mod/HNU/5			Respondent believes that a further 84 dpa is required for providing student accommodation.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/Mod/HNU/6			For housing delivery shortfall, by applying the MHCLG delivery figures to the GL Hearn's OAHN the respondent believes that an additional 153 dpa should be added to the OAHN over the plan period.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376-2/Mod/HNU/6			For housing delivery shortfall, by applying the MHCLG delivery figures to the GL Hearn's OAHN the respondent believes that an additional 153 dpa should be added to the OAHN over the plan period.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd

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Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0582/Mod/HNU/1			In order to make the Plan sound, it is recommended that the housing requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson
PMSID 0583/Mod/HNU/1			In order to make the Plan sound, it is recommended that the housing requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0601/Mod/HNU/1			Recommendation that an uplift for market signals and affordable housing need is provided.	DPP Planning (Claire Linley) OBO PJ Procter
PMSID 0603/Mod/HNU/1			CYC should revert to the 2014 base data in line with NPPG	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0603/Mod/HNU/2			CYC should update their evidence base in line with the NPPF using the Standard Methodology calculations.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0603/Mod/HNU/3			According to Savills' assessment CYC should allocate additional sites to protect housing land supply and to ensure CYC meet the Local Plan's housing requirement	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0891/Mod/HNU/1			In order to make the Plan sound, it is recommended that the housing requirement in Policy SS1 is increased to a minimum of 1,070 in line with the Standard Method Local Housing Need calculation.	Johnson Mowatt (Mark Johnson) OBO Redrow Homes

8. Plan-wide Theme - York's Future Housing Requirement

Housing Needs Update

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0917-2/Mod/HNU/1			A large increase in the supply of small and medium sized sites to increase the supply of land by 20%.	Thomas Pilcher

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0210/LC/HTRAJ/1	Yes		No comment provided	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0253/LC/HTRAJ/1	Yes			Litchfields (Alastair Willis) OBO Bellway Homes
PMSID 0607/LC/HTRAJ/1	Yes		No specific details provided	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
Soundness				
PMSID 0125/S/HTRAJ/1		Not Sound	Lead in times used in housing trajectory are overly-optimistic to the point of being unrealistic. They do not provide a robust set of assumptions to base the housing trajectory on.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HTRAJ/2		Not Sound	Delivery rates used in the plan, 35 dwellings per outlet per annum, are a reasonable starting point but the reality is always more complex especially on larger sites. In general the delivery rate estimates are overly-optimistic and do not provide a robust assumption to base the housing trajectory on.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HTRAJ/3		Not Sound	Density assumptions are overly-optimistic to the point of being unrealistic. They do not provide a robust set of assumptions to base the housing trajectory on.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HTRAJ/4		Not Sound	A number of the proposed allocations do not have a realistic prospect of delivering housing within the next five years when applying more robust assumptions in terms of lead-in and build rates, this puts the five year land supply in serious doubt.	Persimmon Homes (Jess Kiely)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0125/S/HTRAJ/5		Not Sound	Windfall allowance is overly-optimistic to the point of being unrealistic. It is accepted that windfalls should be included in the overall housing delivery trajectory but only consider that they are appropriate outwith the first 5-year period. The inclusion of a significant windfall figure in earlier years increases the likelihood of artificially inflating the housing delivery figures in year 3 and double counting sites with permission. It does not account for any potential delays to the build out sites with extant consent. The proposed windfall allowance is too high because tightly defined settlement boundaries in York and surrounding settlements means there is a finite supply of sites which can come forward. Average completion figure in the past three years is largely dependent on recent changes to permitted development rights. As a consequence, it is considered that after an initial surge the conversion rate will revert back to the long term average. It is likely that the optimum conversion sites will be completed in the short term and the less sustainable and attractive office developments in York will not be converted.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HTRAJ/5		Not Sound	Windfall allowance is overly-optimistic to the point of being unrealistic. It is accepted that windfalls should be included in the overall housing delivery trajectory but only consider that they are appropriate outwith the first 5-year period. The inclusion of a significant windfall figure in earlier years increases the likelihood of artificially inflating the housing delivery figures in year 3 and double counting sites with permission. It does not account for any potential delays to the build out sites with extant consent. The proposed windfall allowance is too high because tightly defined settlement boundaries in York and surrounding settlements means there is a finite supply of sites which can come forward. Average completion figure in the past three years is largely dependent on recent changes to permitted development rights. As a consequence, it is considered that after an initial surge the conversion rate will revert back to the long term average. It is likely that the optimum conversion sites will be completed in the short term and the less sustainable and attractive office developments in York will not be converted.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HTRAJ/6		Not Sound	Concerns with the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018), is flawed and is inflated through the inclusion of privately managed off-campus student accommodation. Furthermore, in line with both the 2014 and latest 2019 iterations of the PPG, it is considered that the Council should deal with backlog in full against planned requirements within the first 5 years of the plan period (i.e. the 'Sedgefield' approach to backlog).	Persimmon Homes (Jess Kiely)
PMSID 0125/S/HTRAJ/7		Not Sound	Table PM21c/d of the Proposed Modifications sets out the Council's assessment of its position and has projected forward a five-year supply for the years 2018/19 to 2022/23. However, the calculation sets out a supply figure over a six- year period (2017/18 – 2022/23) as opposed to a five year period (2018/19 – 2022/23). It is also unclear how the Council has arrived at its proposed 6.38 years supply, including the additional 0.38 years as a result of a remaining oversupply. It is considered that the Council's approach of calculating its 5YHLS does not accord with the 2014 PPG / 2012 NPPF approach to calculating housing supply.	Persimmon Homes (Jess Kiely)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0125/S/HTRAJ/8		Not Sound	In line with paragraph 47 of the NPPF (2012) the Council should apply a 20% buffer to provide a realistic prospect of achieving the planned supply. It should be applied to both the forward requirement and the under-supply. This approach accords with the framework, which suggests that the buffer should be added to the total requirement which would, inevitably, include any under delivery from earlier years. Using the council's OAHN of 790 dpa and Sedgfield method the council falls just short of having a five year land supply. Using the Lichfield OAHN there is only a 2.18 year land supply.	Persimmon Homes (Jess Kiely)
PMSID 0182/S/HTRAJ/1		Not Sound	We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd
PMSID 0210/S/HTRAJ/1			Respondent has concerns regarding the calculation of historic housing completions (resulting in a shortfall of housing) and Council's approach to calculating its five year housing land supply.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/HTRAJ/1		Not Sound	Council's current proposals will not seek to allocate sufficient housing to meet the identified OAHN and unmet need, as defined by respondent.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/HTRAJ/2		Not Sound	Proposed modification to housing requirement is not based on robust evidence and not compliant with the NPPF	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/HTRAJ/3		Not Sound	The Council's housing trajectory assumptions are not considered robust. Without sufficient housing allocations, as defined by respondent, the Local Plan risks not being able to deliver and be sufficiently flexible to change over the plan period	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/HTRAJ/4		Not Sound	Council's current OAHN of 790 is not based on robust evidence and therefore is not in accordance with the NPPF for sustainable development. The Council's trajectory is not robust and therefore questions whether the Council has sufficient sites for first five years or across the plan period.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0220/S/HTRAJ/1		Not Sound	In addition to meeting the housing land requirement during the Plan period, the Council must also look beyond this period to establish an enduring Green Belt boundary. The Council has sought to address this by allocating housing land for the period 2033 to 2038. Using the Council's annual figure of 790 units as per the Proposed Modifications, the requirement for the 5-year period beyond 2033 would be 3,950 dwellings. However, using the Government's figure of 1,070 units per annum provides a requirement as 5,350 dwellings. As such, this would provide an overall housing requirement of 22,447 to be provided through allocations, and not 11,895.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson
PMSID 0231/S/HTRAJ/1		Not Sound	Not clear why there are four different trajectories and how they are intended to relate to each other. There is no clarity if the Council is proposing a nonimplementation rate or not.	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/HTRAJ/2		Not Sound	Council's position on inherited shortfall is incorrect for two reasons. Firstly, the trajectories are in contradiction with Policy SS1 as proposed to be modified. Purpose of the trajectories is not to introduce new policy but to show how the housing requirement set out in policy is to be met over the plan period to 2033. Policy SS1 (as now proposed to be modified) makes no reference to a housing requirement of 822dpa over the plan period or any need to make up any shortfall. There is no possible basis to interpret modified Policy SS1 as setting out "an annual housing target " for the plan period of 822dpa, as suggested by the trajectories. Secondly, the GL Hearn report is ambivalent about what period it covers in its conclusion that the OAHN for York is 790dpa. Provides no support for the existence of a shortfall against housing needs for the 5 years preceding the plan period.	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/HTRAJ/3		Not Sound	Questions the inclusion of a 10% non-implementation rate on applications which have been granted permission. Considers that the Council did not consider there was a need for a non-implementation rate when it submitted the Local Plan. The Council has presented no new evidence with the proposed modifications which would justify any change of mind. If sites do not come forward for development, these can be dealt with through the regular five-year reviews of the Local Plan, by taking steps to secure speedier development or by deletion and replacement by alternative sites. This course of action should be preferred to the wasteful allocation of Green Belt land for development on a just-in-case basis.	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/HTRAJ/4		Not Sound	The Council has argued that the planned over -supply in the plan period is necessary to meet the assessed housing needs up to 2037/38. This argument is undermined by the lack of any phasing of greenfield allocations in the Local Plan which could lead to all the allocated housing land (including for the post-plan period) being developed by 2033. This over-supply must also be placed in the context that there is no evidence to support the higher assessed need of 790dpa being applied beyond 2033 (or in reality 2031). On this basis, it would be reasonable to apply the OAHN derived from the 2016-based SNHP (plus 10% for market signals) equalling 532dpa. The trajectories highlight the substantial over -provision of housing land made by the Local Plan. The Council should have reviewed the Local Plan housing supply in the light of a lower OAHN.	Fulford Parish Council (Rachel Robinson)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0253/S/HTRAJ/1		Not Sound	Lichfield's have analysed the SHLAA (2018) and Proposed Mods to the Plan. CYC state the shortfall 2012-17 is 518 dwellings and have concerns these figures are inflated due to student accommodation being included. Some of the suggested delivery rates on draft allocations are unrealistic and not sufficient to demonstrate a 5 year housing supply. CYC should in line with NPPF provide clear evidence completions will take place on sites within 5 years. Many of the allocations sites do not have submitted applications. Based on an OAHN of 1300 dpa CYC cannot demonstrate a 5 YHLS.	Litchfields (Alastair Willis) OBO Bellway Homes
PMSID 0255/S/HTRAJ/1		Not Sound	Object to the housing requirement has been amended to 790dpa based on the HNU 2019 that has been produced to reflect the 2016 based sub-national population and household projections from ONS and CLG. Numbers of older people and younger peoples household formation rates are not set to grow as previously anticipated. ONS have stated 'household projections are not a prediction or forecast of how many houses should be built in the future'. latest household projections will continue the trend of young people forming households much later in life than in previous years. Help to Buy has been brought in to try to address this issue. However, the Govt. aim of 300k dpa will not be achieved using the 2016 projections. PPG sets out how to undertake a Housing Needs Assessment through a standard method - requiring the continued use of the 2014 based projections.	Home Builders Federation (Joanne Harding)
PMSID 0339/S/HTRAJ/1		Not Sound	The site has only just received outline planning permission, has no developers signed up and requires land assembly, sale and preparation prior to homes being released. The Councils ambitions for delivery next year are clearly unrealistic, given the length of time site acquisition and the determination of a planning application will take for a detailed scheme, let alone site preparation and build. The Council need to be realistic about its delivery and assumptions made on the housing trajectory. Simply allocating unreasonable numbers to the site with no evidence will continue to restrict the level of homes in the city and under provide for the needs of its residents. The site should therefore be significantly reduced in terms of the delivery in this plan period, with the homes being pushed into the next plan period. This way sufficient other sites can be allocated to meet the needs in this plan period.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0345/S/HTRAJ/1		Not Sound	The trajectories for sites included in the Plan appear to make inappropriate assumptions about housing delivery in at least the first half of the Plan period. Does not build in appropriate lead-in times/pre-application or time gaining planning approval. Further, assumed delivery rates (35dpa) are too low; a more reliable figure is 50dpa and 60dpa. Major sites could yield 100-120 dpa.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0345/S/HTRAJ/2			CYC is making little provision for development beyond the Plan period and is only contemplating a period of 5 years post 2033 in any event.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0376-2/S/HTRAJ/1		Not Sound	Respondent objects to CYC's suggested housing requirement projections and the that further housing allocations must be identified in Policy H1, enabling more land released from the Green Belt to meet Council's properly calculated housing requirement to ensure sufficient flexibility and a deliverable Local Plan.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376/S/HTRAJ/1		Not Sound	Respondent objects to CYC's suggested housing requirement projections and the that further housing allocations must be identified in Policy H1, enabling more land released from the Green Belt to meet Council's properly calculated housing requirement to ensure sufficient flexibility and a deliverable Local Plan.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0378/S/HTRAJ/1		Not Sound	NB: Critique of ST15 delivery trajectory compared to Langwith is supplied (Appendix 5). Necessary evidence to demonstrate deliverability of ST15 is not presently available, and the delivery trajectory lacks clarity on how it can be achieved: no planning application has yet been made for ST15; preparation of a planning application for the delivery of ST15 would take a considerable period of time (upwards of 12 months); delivery of access would need to be consented and technical details agreed (potentially 5-6 years in communication with Highways England). Would not expect first housing to be developed until 2022/23 at the earliest. The trajectory is overly ambitious, relying on an average annual delivery of 200 units per annum (4 outlets) over 11 years from a single point of access. It is considered that there is significant upfront costs required to open up the site, which will delay the productive development of the site and necessary commercial arrangements with third party landowners. Also currently conflict with policy requirements requiring delivery of ecological mitigation in advance which would cause further delay.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0581/S/HTRAJ/1		Not Sound	SHLAA figure 6 states that a total of 590 net housing completions took place during the 2018/19 monitoring year, whereas the recently published Full Year Housing Monitoring Update gives this figure at 449. The trajectory is therefore inconsistent with other Council published data.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0582/S/HTRAJ/1			Object to the undersupply of 512 dwellings being annualised over the Plan period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0583/S/HTRAJ/1			It is noted that Site ST8 – Monks Cross includes an anticipated delivery of 35 dwellings in 2019/20, increasing to 70 dwellings per annum between 2020/21 and 2022/23, and then 105 dwellings per annum from 2023/24 onwards. 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.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0585/S/HTRAJ/1		Not Sound	It is noted that Site ST7 – Land east of Metcalfe Lane includes an anticipated delivery of 35 dwellings in 2020/21 and 2021/22, increasing to 70 dwellings per annum from 2022/23 onwards. Given the delays in the Local Plan; the reliance of the Local Plan adoption before any approval on ST7; and the fact that an application has yet to be submitted, it is highly unrealistic to expect delivery of dwellings next year.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/2		Not Sound	We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/3		Not Sound	Lead in times used in housing trajectory are overly-optimistic to the point of being unrealistic. They do not provide a robust set of assumptions to base the housing trajectory on.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/4		Not Sound	Delivery rates used in the plan, 35 dwellings per outlet per annum, are a reasonable starting point but the reality is always more complex especially on larger sites. In general the delivery rate estimates are overly-optimistic and do not provide a robust assumption to base the housing trajectory on.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/5		Not Sound	Density assumptions are overly-optimistic to the point of being unrealistic. They do not provide a robust set of assumptions to base the housing trajectory on.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/6		Not Sound	A number of the proposed allocations do not have a realistic prospect of delivering housing within the next five years when applying more robust assumptions in terms of lead-in and build rates, this puts the five year land supply in serious doubt.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0585/S/HTRAJ/7		Not Sound	Windfall allowance is overly-optimistic to the point of being unrealistic. It is accepted that windfalls should be included in the overall housing delivery trajectory but only consider that they are appropriate outwith the first 5-year period. The inclusion of a significant windfall figure in earlier years increases the likelihood of artificially inflating the housing delivery figures in year 3 and double counting sites with permission. It does not account for any potential delays to the build out sites with extant consent. The proposed windfall allowance is too high because tightly defined settlement boundaries in York and surrounding settlements means there is a finite supply of sites which can come forward. Average completion figure in the past three years is largely dependent on recent changes to permitted development rights. As a consequence, it is considered that after an initial surge the conversion rate will revert back to the long term average. It is likely that the optimum conversion sites will be completed in the short term and the less sustainable and attractive office developments in York will not be converted.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/8		Not Sound	Concerns with the way in which the Council has calculated historic housing completions, shown within table 5 of the SHLAA (2018), is flawed and is inflated through the inclusion of privately managed off-campus student accommodation. Furthermore, in line with both the 2014 and latest 2019 iterations of the PPG, it is considered that the Council should deal with backlog in full against planned requirements within the first 5 years of the plan period (i.e. the 'Sedgefield' approach to backlog).	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/9		Not Sound	Table PM21c/d of the Proposed Modifications sets out the Council's assessment of its position and has projected forward a five-year supply for the years 2018/19 to 2022/23. However, the calculation sets out a supply figure over a six- year period (2017/18 – 2022/23) as opposed to a five year period (2018/19 – 2022/23). It is also unclear how the Council has arrived at its proposed 6.38 years supply, including the additional 0.38 years as a result of a remaining oversupply. It is considered that the Council's approach of calculating its 5YHLS does not accord with the 2014 PPG / 2012 NPPF approach to calculating housing supply.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/S/HTRAJ/10		Not Sound	In line with paragraph 47 of the NPPF (2012) the Council should apply a 20% buffer to provide a realistic prospect of achieving the planned supply. It should be applied to both the forward requirement and the under-supply. This approach accords with the framework, which suggests that the buffer should be added to the total requirement which would, inevitably, include any under delivery from earlier years. Using the council's OAHN of 790 dpa and Sedgefield method the council falls just short of having a five year land supply. Using the Lichfield OAHN there is only a 2.18 year land supply.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0590/S/HTRAJ/1		Not Sound	We believe CYC has adopted the wrong approach in estimating housing commitments, backlog and including of student housing. The calculations of completions is too high, and windfall inclusion is questionable. We are concerned at the scale of backlog in completions in recent years and if excluding student accommodation this amounts to 2902 dwellings (from 2012 to 2019)	York and North Yorkshire Chamber of Commerce (Susie Cawood)

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Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0592/S/HTRAJ/1		Not Sound	In addition to meeting the housing land requirement during the Plan period, the Council must also look beyond this period to establish an enduring Green Belt boundary. The Council has sought to address this by allocating housing land for the period 2033 to 2038. Using the Council's annual figure of 790 units as per the Proposed Modifications, the requirement for the 5-year period beyond 2033 would be 3,950 dwellings. However, using the Government's figure of 1,070 units per annum provides a requirement as 5,350 dwellings. As such, this would provide an overall housing requirement of 22,447 to be provided through allocations, and not 11,895.	Oneill Associates (Graeme Holbeck) OBO Yorvik Homes
PMSID 0607/S/HTRAJ/1		Not Sound	Lead in times and delivery rates for a number of allocated sites are unrealistic and need reviewing with an over estimation of supply both in the immediate 5 year supply and Plan period.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0890/S/HTRAJ/1		Not Sound	We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0891/S/HTRAJ/1			Object to the undersupply of 512 dwellings being annualised over the Plan period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowatt (Mark Johnson) OBO Redrow Homes
PMSID 0894/S/HTRAJ/1		Not Sound	Deliverability of these sites is doubtful. NPPF places emphasis on plans having a diverse pool of sites that can come forward at various times throughout the plan to ensure a balanced housing market.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0895/S/HTRAJ/1		Not Sound	Council is going against national policy by using the 2016 household projection figures instead of the 2014 data which the respondent believes is not the most appropriate or reasonable strategy to plan for growth. The 2014 household projection figures should be used alongside the standard methodology, including affordable housing need, which highlights a substantial uplift in housing demand above what the draft modifications are proposing	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
Proposed Modification				
PMSID 0125/Mod/HTRAJ/1			Recommends more realistic lead in times (see Lichfield's table 14 of their Housing Issues Technical Paper (March 2018) that provides details of various start to finish times of a range of previous schemes all of which are significantly longer than those in the current Plan).	Persimmon Homes (Jess Kiely)

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0125/Mod/HTRAJ/2			Recommends the following delivery rate assumptions: 0-100 unit sites provide 25 dpa, 100-250 unit sites provide 40 dpa, 250-500 unit sites provide 65dpa and 500+ unit sites provide 90 dpa.	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HTRAJ/3			Where developers are vague on detail the assumption for an average site in York for the gross to net ratio at most should be 85%, although this can reduce to less than 60% for larger developments with significant infrastructure requirements. Unless there is specific evidence to the contrary the default density on suburban sites should be 35 dph.	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HTRAJ/4			The Council should adopt a more cautious approach when seeking to include strategic allocations within the five year supply.	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HTRAJ/5			Proposed windfall allowance should be reduced from 169dpa to 100dpa (rounded up from 97) which represents a far more realistic windfall allowance over the plan period. The incorporation of this figure would ensure that the Council's trajectory is not artificially inflated, can be realistically achieved and would only be incorporated into the delivery trajectory at Year 5 (2022/23) to ensure no double counting.	Persimmon Homes (Jess Kiely)
PMSID 0125/Mod/HTRAJ/6			There is a significant shortfall of dwellings and the plan should allocate additional sites for development to meet York's true housing need and ensure an adequate five year land supply if the plan is to be found sound.	Persimmon Homes (Jess Kiely)
PMSID 0182/Mod/HTRAJ/1			We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd
PMSID 0210/Mod/HTRAJ/1			Council to revisit delivery assumptions of housing trajectory to ensure the robust delivery of five years worth of housing plus sufficient housing across the plan period	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0231/Mod/HTRAJ/1			Considers that the inherited shortfall should be deleted from the trajectories.	Fulford Parish Council (Rachel Robinson)

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0253/Mod/HTRAJ/1			CYC should revisit the evidence base that underpins the minimum housing requirement of 790 dpa. Taking on board Lichfield's analysis that results in a figure in the region of 1300 dpa (plus housing backlog). CYC should as a result identify additional housing sites to meet the shortfall. The 5 YHLS assumptions should be revisited to ensure they are robust.	Litchfields (Alastair Willis) OBO Bellway Homes
PMSID 0339/Mod/HTRAJ/1			Assumptions made in the housing trajectory about the deliverability of York Central are so overly-optimistic as to be wrong. Delivery in this plan period should be significantly reduced with some of the homes being delivered in the next plan period.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0582/Mod/HTRAJ/1			Object to the undersupply of 512 dwellings being annualised over the Plan period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson
PMSID 0583/Mod/HTRAJ/1			Object to the undersupply of 512 dwellings being annualised over the Plan period. The shortfall should be annualised over first 5 years of the Plan. 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.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0585/Mod/HTRAJ/1			We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HTRAJ/2			Recommends more realistic lead in times (see Lichfield's table 14 of their Housing Issues Technical Paper (March 2018) that provides details of various start to finish times of a range of previous schemes all of which are significantly longer than those in the current Plan).	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0585/Mod/HTRAJ/3			Recommends the following delivery rate assumptions: 0-100 unit sites provide 25 dpa, 100-250 unit sites provide 40 dpa, 250-500 unit sites provide 65dpa and 500+ unit sites provide 90 dpa.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HTRAJ/4			Where developers are vague on detail the assumption for an average site in York for the gross to net ratio at most should be 85%, although this can reduce to less than 60% for larger developments with significant infrastructure requirements. Unless there is specific evidence to the contrary the default density on suburban sites should be 35 dph.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HTRAJ/5			The Council should adopt a more cautious approach when seeking to include strategic allocations within the five year supply.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HTRAJ/6			Proposed windfall allowance should be reduced from 169dpa to 100dpa (rounded up from 97) which represents a far more realistic windfall allowance over the plan period. The incorporation of this figure would ensure that the Council's trajectory is not artificially inflated, can be realistically achieved and would only be incorporated into the delivery trajectory at Year 5 (2022/23) to ensure no double counting.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0585/Mod/HTRAJ/7			There is a significant shortfall of dwellings and the plan should allocate additional sites for development to meet York's true housing need and ensure an adequate five year land supply if the plan is to be found sound.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0601/Mod/HTRAJ/2			An allowance should be made for improving headship rates and that the 2014 projections are used instead of the 2016 projections.	DPP Planning (Claire Linley) OBO PJ Procter
PMSID 0869- 3/Mod/HTRAJ/1			As Housing Trajectory is proposed to be lowered by 9% to 790, the quoted estimated yields should be revisited and adjusted accordingly as per 5.12 of the Local Plan	Ray Calpin

8. Plan-wide Theme - York's Future Housing Requirement

Housing Trajectory

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0890/Mod/HTRAJ/1			We object to the undersupply of 512 dwellings being annualised over the Plan Period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0891/Mod/HTRAJ/1			Object to the undersupply of 512 dwellings being annualised over the Plan period. The shortfall should be annualised over first 5 years of the Plan.	Johnson Mowatt (Mark Johnson) OBO Redrow Homes

9. Plan-wide Theme - Removal of Strensall Barracks

Policy SS19(Site ST35) Removal of Strensall Barracks

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0381/LC/SS19(ST35)/1	Yes		The removal of the Queen Elizabeth Barracks and related policy strengthens the Local Plan.	Yorkshire Wildlife Trust (Sara Robin)
PMSID 0860-1/LC/SS19(ST35)/1	Yes		Agrees with not developing the Queen Elizabeth Barracks for housing based on adverse effects as reported in Habitats Regulations Assessment. However, if site cannot be safeguarded against the effects of vandalism, abandonment and long term deterioration then another development scheme may be needed that could satisfy the HRA requirements.	Councillor (Paul Doughty)
Soundness				
PMSID 0004/S/SS19(ST35)/1			Disappointed with the recommendations given with regards Queen Elizabeth Barracks. Further consideration should be given to the future use of the SS19(ST35) Queen Elizabeth Barracks site.	Dennis Slights
PMSID 0099/S/SS19(ST35)/1		Sound	Support the removal of Policy SS19 and the deletion of ST35 and H59	Strensall with Towthorpe PC (Fiona Hill)
PMSID 0187/S/SS19(ST35)/1		Sound	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.	Ryedale District Council (Jill Thompson)
PMSID 0214/S/SS19(ST35)/1			Agree with the proposed modifications in relation to Removal of Strensall Barracks (PMs 2, 13, 14, 18, 19). Updated evidence prepared by the Council supports the proposed modification.	ONeill Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0231/S/SS19(ST35)/1		Not Sound	The Council does not seek to justify the proposed modification by saying that the Barracks site is of such high environmental value. The Local Plan should provide a policy basis for its re -use and redevelopment. In this regard the Local Plan should recognise that housing is the most appropriate form of development and that the site is likely to provide a significant number of dwellings in the plan period. It would be contrary to national policy for such a large predominantly brownfield site to be left vacant and unused. Recognises the sensitivity of Strensall Common SAC but believes that appropriate mitigation (coupled with a possible reduction in housing numbers) could ensure that there would be no adverse effect on the integrity of the European site. This mitigation could take the form of better habitat management, habitat restoration, improved wardening and more effective visitor controls.	Fulford Parish Council (Rachel Robinson)

9. Plan-wide Theme - Removal of Strensall Barracks

Policy SS19(Site ST35) Removal of Strensall Barracks

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0231/S/SS19(ST35)/1			T35 and H59 do not make any contribution to Green Belt purposes. The primary interest of this matter is that the de-allocation of this predominantly brownfield strategic site significantly increases the need for greenfield and Green Belt releases elsewhere	Fulford Parish Council (Rachel Robinson)
PMSID 0260/S/SS19(ST35)/1			Agrees with removal of Strensall Barracks as an allocation for development due to impact on Strensall Common (See additional Comments on TP1 and Alternative site SF1)	Pegasus Group (Emma Ridley) OBO Level Developmensts Ltd
PMSID 0345/S/SS19(ST35)/1		Not Sound	DIO objects in the strongest possible terms to the proposed deletion of SS19. The QEB allocations were sound elements of the Local Plan when it was submitted and remain sound in spite of the Footprint work and the revised HRA. The proposed deletion of the QEB is predicated on one matter only; that is the suggestion that deletion is necessitated by the Habitats Regulations 2017 because of "doubts surrounding the effectiveness of mitigation" in relation to recreational impacts. The evidence underpinning the modifications is not robust and, in any event, does not indicate that it is not possible to mitigate adverse effects that development at QEB might have on the SAC. The available evidence does not prove that the development of the QEB sites would adversely affect the integrity of the SAC and nor does it demonstrate that mitigation measures cannot be deployed that would bot reduce existing pressures on the Common and alleviate any additional pressure generated by the QEB allocations. Reliance on the Footprint work and a poor HRA has resulted in decision taking that is flawed. DIO is confident that it can put n place a range of measures that will not only mitigate any adverse effects that might be caused by the development of the QEB sites but will also reduce existing pressures on the Common. It is important to note that DIO owns the Common and has full control of it; it gives it the ability to exert direct control over how the Common is used and, where necessary, introduce additional controls.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0364/S/SS19(ST35)/1			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. This site (together with uncertainty around ST36 - Imphal Barracks) create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments.	York Labour Party (Dave Merrett)
PMSID 0365/S/SS19(ST35)/1			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. This site (together with uncertainty around ST36 - Imphal Barracks) create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments.	Rachael Maskell MP for York Central
PMSID 0369/S/SS19(ST35)/1		Sound	Agree with the removal of the site. Important that the site is not left abandoned in the long term. Protective measures should be put in place to ensure it is not left derelict and a target for vandalism. If this isn't possible, and the Council can offer a workable plan to redevelop the site with good quality local facilities and necessary infrastructure (to comply with the HRA) this may be a useful contribution to future housing need.	Julian Sturdy MP for York Outer

9. Plan-wide Theme - Removal of Strensall Barracks

Policy SS19(Site ST35) Removal of Strensall Barracks				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0381/S/SS19(ST35)/1		Sound	Exclusion of SS19 shows the Plan was positively prepared by responding to objections from Natural England and YWT (amongst others). The Plan will also be more consistently justified, effective and consistent with national and international policy on the protection of habitats.	Yorkshire Wildlife Trust (Sara Robin)
PMSID 0383/S/SS19(ST35)/1		Sound	Supoort and agree with the findings of the HRA. Welcome the removal of allocations ST35 and H59 and Policy SS19. Would be concerned if these allocations were retained in the Plan.	Natural England (Merlin Ash)
PMSID 0587/S/SS19(ST35)/1			Agree with the proposed modifications in relation to Removal of Strensall Barracks (PMs 2, 13, 14, 18, 19). Updated evidence prepared by the Council supports the proposed modification.	ONEill Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0609/S/SS19(ST35)/1		Sound	Welcome the abandonment of the proposal to use the Strensall Barracks site itself for new housing, which may help to protect some significant numbers of MoD jobs in the City, besides helping to protecting the Strensall SSSI.	York and District Trades Union Council (Dave Merrett)
PMSID 0620/S/SS19(ST35)/1			Agree with the proposed modifications in relation to Removal of Strensall Barracks (PMs 2, 13, 14, 18, 19). Updated evidence prepared by the Council supports the proposed modification.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0850/S/SS19(ST35)/1		Sound	Removal of allocations should reduce the scale of impact on the Strategic Road Network.	Highways England (Simon Jones)
PMSID 0860-1/S/SS19(ST35)/1		Sound	Modification considered justified. Agree with not developing the Queen Elizabeth Barracks for housing based on adverse effects as reported in Habitats Regulations Assessment.	Councillor (Paul Doughty)
PMSID 0860-3/S/SS19(ST35)/1		Sound	maintains Green Belt land to the north of the Common.	Councillor (Paul Doughty)

9. Plan-wide Theme - Removal of Strensall Barracks

Policy SS19(Site ST35) Removal of Strensall Barracks				
Unique comment ref	Complies with Dtc ?	Legal Compliant/Sound	Comments relating to Legal Compliance / Dtc /Soundness or proposed modifications	Submitted By:
PMSID 0868/S/SS19(ST35)/1		Sound	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	West Yorkshire Combined Authority (Alan Reiss)
PMSID 0886/S/SS19(ST35)/1			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. This site (together with uncertainty around ST36 - Imphal Barracks) create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments.	York Labour Group (Dave Merrett)
PMSID 0914/S/SS19(ST35)/1		Sound	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	Leeds City Region LEP (James Whiteley)
Proposed Modification				
PMSID 0231/Mod/SS19(ST35)/1			ST35 and H59 should be allocated and the Green Belt boundary should be restored to that shown by the Submitted Plan.	Fulford Parish Council (Rachel Robinson)
PMSID 0345/MOD/SS19(ST35)/1			Delete relevant proposed modifications and reinstate allocation of Queen Elizabeth Barracks. The HRA must be re-cast.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0860-3/Mod/SS19(ST35)/1	Yes		However, if site cannot be safeguarded against the effects of vandalism, abandonment and long term deterioration then another development scheme may be needed that could satisfy the HRA requirements	Councillor (Paul Doughty)

10. Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019)

SA/SEA				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0118/LC/SA/1	Yes		Agree with the conclusions of the screening process about which aspects of the Plan may need reviewing. Agree with the conclusions regarding the significant effects which the 'screened-in' modifications would be likely to have upon the historic environment.	Historic England (Ian Smith)
PMSID 0213/LC/SA/1	Yes		No issues to raise.	Hambleton District Council (James Campbell)
PMSID 0231/LC/SA/1	No		SA should appraise the relevant local plan proposal/policy and the reasonable alternatives to it. the June 2019 SA does not appraise any of the up-to-date reasonable alterations to the 790dpa requirement which are set out in the GL Hearn report including the demographic starting point or a variant of it with a market signals adjustment. The only alternatives appraised are higher requirements which are agreed by the Council either to be out -of-date (867dpa derived from the 2014-based SNHP and the 953dpa derived from the 2014-based SNHP plus a 10 market signals adjustment) or not in accord with Government policy (the 1070dpa based on the standard methodology which is not applicable to this Plan).	Fulford Parish Council (Rachel Robinson)
PMSID 0231/LC/SA/2	No		The SA does not appraise the sustainability implications of the decision not to reduce the amount of the proposed housing supply in the light of the Lower housing requirement. If it had done so, it would have found substantial benefits of reducing supply to most of the SA objectives, especially objectives 8, 9, 11, 14 and 15. There would be no harm to other SA objectives as housing needs would continue to be met. This failure means that the conclusions set out in paragraph 5.4.8 of the SA are incorrect and cannot be justified	Fulford Parish Council (Rachel Robinson)
PMSID 0231/LC/SA/3	No		Fails to recognise the environmental harm which will be caused by the deletion of the Queen Elizabeth Barracks Strensall site as a strategic site for housing development and its inclusion within the Green Belt. The site is mainly brownfield. Its inclusion in the Green Belt and the lack of any enabling policy will make its redevelopment very difficult, contrary to SA Objective 9.	Fulford Parish Council (Rachel Robinson)
PMSID 0383/LC/SA/1	Yes		Welcome the updated SA. In particular the consideration given to the findings of the HRA in the context of sustainability.	Natural England (Merlin Ash)
PMSID 0833/LC/SA/1	No			George E Wright

10. Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019)

SA/SEA

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0841/LC/SA/1	No			Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0894/LC/SA/1	Yes		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.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0895/LC/SA/1	Yes		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.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd

Soundness

PMSID 0339/S/SA/1		Not Sound	The SA scoring between general and strategic sites is difficult to follow. Assessment of Our Clients sites is considered to be incorrect and requires amendment. Notwithstanding this, without amendment the sites score better than some allocated sites and with the corrections this increases. With the sites at Manor Heath (ST12), Metcalfe Lane (ST7) and New Lane (ST11) it is not considered that there is any harm to the Green Belt, therefore this would not be justified to deviate from the findings of the SA. On this basis we object to the SA at present and the implementation of its findings.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0378/S/SA/1			Attached Sustainability Appraisal ('SA') for Langwith (Appendix 1). Notwithstanding the fact that ST15 is not deliverable and, therefore, the SA of it is entirely hypothetical, it is demonstrated that Langwith is more sustainable than ST15, by comparison to the SA for that site (CD008, as a subsequent Addendum, CD011 and the current Addendum).	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0826-1/S/SA/1		Not Sound	Sustainable locations have been overlooked	Thomas Pilcher Homes (Thomas Pilcher)
PMSID 0833/S/SA/1			The SA for the Consultation documents does not cover the issue of alternative approaches to the Green Belt issues. The SA only considers alternatives in relation to allocations and does not cover alternative approaches to Green Belt matters. The LPA have not since 1996 sat back and considered the Plan approach from a clean sheet or objective consideration. alternative approaches to green belt would better embrace the current policy framework than the concepts evolved in the late 1980s, upon which they still base their approach.	George E Wright

10. Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019)

SA/SEA

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0841/S/SA/1		Not Sound	I endorse the entirety of George Wright's comments at paragraphs 7.1 – 7.5 of his submissions.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0885/S/SA/1		Not Sound	Sustainable locations have been overlooked	Lime Tree Homes Ltd (Thomas Pilcher)
PMSID 0906/S/SA/3			The SA states that the development will have 'uncertain effects on the Tilmire' and the HRA states that 'significant effects [on the Tilmire] can't be ruled out'. Therefore an independent environmental assessment is needed.	Keith Emmans

10. Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019)

HRA

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0213/LC/HRA/1	Yes		No issues to raise.	Hambleton District Council (James Campbell)
PMSID 0242/LC/HRA/1	Yes		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.	East Riding of Yorkshire Council (Tom Bannister)
PMSID 0383/LC/HRA/1	Yes		Welcomes the revised HRA. Agrees with the revised conclusions and is satisfied in this context that the Plan is legally compliant.	Natural England (Merlin Ash)
Soundness				
PMSID 0052/S/HRA/1		Not Sound	Habitats Regs in terms of ST15 should have similar implications to those affecting the removal of Strensall Barracks sites	Pauline Bramley
PMSID 0345/S/HRA/1			DIO makes no criticism of the way in which the consultant (Footprint) went about gathering visitor data, however it has a number of concerns about the extent of the survey, the robustness and representativeness of the data and how it has been interpreted. Further, the HRA's assertion that the Footprint report provides "new strong evidence that the proposed mitigation cannot be completely relied upon" is queried and some of the reports assumptions are ignored (eg that 75% of visitors originate within 5.5km of the site, and that the combined impact from allocations would contribute to recreational pressure). It is clear from other European sites and mitigation schemes that the mitigation measures proposed (particularly wardening) are achievable and likely to be effective. It must be the case that a large, well designed area of open space on site would reduce pressure on the Common to some degree. The assertion that "...new residents may well push for greater access (to the SAC) over time" is not evidenced. The available evidence does not prove that the development of the QEB sites would adversely affect the integrity of the SAC and nor does it demonstrate that mitigation measures cannot be deployed that would both reduce existing pressures on the Common and alleviate any additional pressure generated by the QEB allocations. Reliance on the Footprint work and a poor HRA has resulted in decision taking that is flawed.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

10. Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019)

HRA

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0378/S/HRA/1			The updated HRA (EX/CYC/14a) has implications for both ST15 and Langwith. Appendix 2 of this submission maintains 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. In the alternative, Langwith has been assessed and has provided this detail (see Appendix 2 of submission alongside Appendix 7 of the Regulation 19 representations), and it is proven that there will be no unacceptable biodiversity impact on the Lower Derwent Valley SPA nor the Heslington Tillmire SSSI. It is considered that the HRA (2019) considers OS10 as promoting both an area for informal recreation and as compensation habitat for the biodiversity loss to the footprint of ST15, which are incompatible objectives. Further, it acknowledges that there is a risk that 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. The access road would also traverse OS10. The policy framework therefore leaves open the opportunity for failure to deliver biodiversity outcomes and is deficient in detail, which could undermine the conservation objectives for both the SPA and SSSI.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0906/S/HRA/3			The HRA states that 'significant effects [on the Tilmire] can't be ruled out' as a result of the development of ST15, therefore an independent environmental assessment is needed.	Keith Emmans
PMSID 0907/S/HRA/3		Not Sound	The HRA states that 'significant effects [on the Tilmire] can't be ruled out' as a result of the development of ST15, therefore an independent environmental assessment is needed.	Michael Emmans-Dean

10. Sustainability Appraisal/SEA Addendum (June, 2019) and Updated Habitats Regulations Assessment (Feb, 2019)

Policy SS13 (Site ST15)
Land West of Elvington Lane

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0907/S/SS13(ST15)/3	Not Sound		The SA states that the development will have 'uncertain effects on the Tilmire' and the HRA states that 'significant effects [on the Tilmire] can't be ruled out'. Therefore an independent environmental assessment is needed.	Michael Emmans-Dean

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

TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0075/LC/TP1Add/1	No		Annex 5, page A5.14 The map is incorrect. It does not show the SINC site (Elvington Airfield) which is to be built on in the proposal.	Heslington Parish Council
PMSID 0083/LC/TP1Add/1	No		Exceptional Circumstances' should not be used to justify destructive development of the green belt. Particularly ST15 and H39. 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.	Rosemary Tozer
PMSID 0084/LC/TP1Add/1	No		Proposals relating to Elvington have been made without direct engagement with the village and previous responses have been ignored. Elvington Parish Council have not been engaged with.	Tim Tozer
PMSID 0150/LC/TP1Add/1	No		Elvington Parish Council have not been included sufficiently and their views not considered.	Simon Lock
PMSID 0150/LC/TP1Add/2	No		CYC has made the ability of Elvington residents to make their views clear and have their questions answered as difficult as possible.	Simon Lock
PMSID 0160/LC/TP1Add/1	Yes		Considers document to be legally compliant and that it complies with the duty to cooperate	Campaign to Protect Rural England North Yorkshire - CPRENY - (Fran Evans)
PMSID 0193/LC/TP1Add/1	No		Proposed modifications have profound implications for Elvington yet CYC has not consulted with elected parish representatives on proposed changes	Peter Murray
PMSID 0194/LC/TP1Add/1	No		Proposed modifications have profound implications for Elvington yet CYC has not consulted with elected parish representatives on proposed changes	Jessica Murray
PMSID 0195/LC/TP1Add/1	No		Proposed modifications have profound implications for Elvington yet CYC has not consulted with elected parish representatives on proposed changes	Natasha Murray

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

TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0196/LC/TP1Add/1	No		Proposed modifications have profound implications for Elvington yet CYC has not consulted with elected parish representatives on proposed changes	Anneliese Murray
PMSID 0197/LC/TP1Add/1	No		Modifications have profound implications for Elvington yet CYC has not consulted with elected parish representatives on proposed changes to Green Belt in Elvington Parish	Mary Julie Murray
PMSID 0199/LC/TP1Add/1	No		Local Plan fails fundamentally to address the Green Belt issues that were well-known before the start of the plan process.	Airedon Planning (Laura Fern) OBO Jolyon Harrison
PMSID 0221/LC/TP1Add/1	No		Refer to soundness for further comments	Sally Firth
PMSID 0261/LC/TP1Add/1	No		Do not believe the Plan to be legally compliant and fails to co-operate as the village nor the parish council has been consulted on its requirements or proposals to remove land in Elvington from the green belt.	Amanda Moore
PMSID 0333/LC/TP1Add/1	Yes		Proper consultation procedures have been followed to date	Alison Stead
PMSID 0333/LC/TP1Add/2	Yes		The national inspector has requested resubmission of the draft CYC Local plan for consultation because of changes to the Green belt and some proposed sites and this CYC are doing.	Alison Stead
PMSID 0338/LC/TP1Add/2	Yes		It has been prepared with due diligence	Alan Cook
PMSID 0342/LC/TP1Add/1	No		The Local Plan is not legally compliant as it does the complete opposite to the Yorkshire & Humberside RSS Revocation order and the saved policies by redefining already detailed green belt boundaries at and beyond the outer green belt boundary by using weak exceptional circumstances. It does not comply with either the 2012 or 2019 NPPF where it proposes development that is not limited infilling in villages. Many people have not received CD013Q - Annex 16 City Wide Leaflet. Also at least one of the boundaries is wrong.	Andy Bell
PMSID 0354-1/LC/TP1Add/1	No		The documents fail to recognise the correct status of the land to the south of the Poppleton Park & Ride, as 'White Land' (without any designation), and therefore if it was to be included in the Green Belt, there has been no mention of this or consideration of any of the tests that would need to be considered should this be the case.	Peter Vernon Vernon & Co

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

TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0362-3/LC/TP1Add/1			Elvington Parish Council have not been included sufficiently in the process and their views not considered.	Dominic Stevens
PMSID 0362/LC/TP1Add/1	No		Regarding site H39 the views of Elvington Parish Council have been ignored. Considers the whole consultation process to have been a sham. Online forms are time limited, supporting documents difficult to access, language used is opaque, explanations provided are vague and consultation process has been repeated many times.	Dominic Stevens
PMSID 0362/LC/TP1Add/2	No		The consultation process appears to use tactics of confusion, vagueness and utilisation of resident's inability to understand or parse the information provided.	Dominic Stevens
PMSID 0362/LC/TP1Add/3	No		CYC appears to make sourcing of information difficult and place barriers such as, 10 minute time outs when inputting data, referencing documents that are difficult to locate and being vague with explanations of proposed development sites.	Dominic Stevens
PMSID 0362/LC/TP1Add/4			CYC is constantly resubmitting sites to develop, being rejected and then trying to circumvent these decisions by proposing to remove the proposed development land from the Green Belt. This seems like a shady, if not illegal, tactic. Respondent does understand why these sites are being continuously proposed when Planning Inspectors have made their decisions.	Dominic Stevens
PMSID 0412-1/LC/TP1Add/1			Elvington Parish Council have not been included sufficiently and their views not considered.	Louisa Stevens
PMSID 0412-1/LC/TP1Add/2	No		The consultation process appears to use tactics of confusion, vagueness and utilisation of resident's inability to understand or parse the information provided.	Louisa Stevens
PMSID 0412-1/LC/TP1Add/3	No		CYC appears to make sourcing of information difficult and place barriers such as, 10 minute time outs when inputting data, referencing documents that are difficult to locate and being vague with explanations of proposed development sites.	Louisa Stevens
PMSID 0412-1/LC/TP1Add/4			CYC is constantly resubmitting sites to develop, being rejected and then trying to circumvent these decisions by proposing to remove the proposed development land from the Green Belt. This seems like a shady, if not illegal, tactic.	Louisa Stevens
PMSID 0418/LC/TP1Add/1	No		It's not NPPF compliant to treat the 5 purposes of the Green Belt differently.	Chris Wedgwood
PMSID 0420-3/LC/TP1Add/1	No			Jane Moorhouse

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

TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0420-2/LC/TP1Add/1	No		Elvington residents comments have been totally ignored on each consultation	Jane Moorhouse
PMSID 0420 -1/LC/TP1Add/1	No		The whole Plan process has been devised to not allow residents their say about their little rural villages on the outskirts of York being over developed. Allowing allocations York doesn't want	Jane Moorhouse
PMSID 0827-1/LC/TP1Add/1	No		Permanence of green belt. To make green belts robust they should not include land which is not necessary to be designated. Such land that exists between an urban boundary edge and the identifiable inner boundary of a green belt would be designated as safeguarded land. John Hobson QC advised CYC that a green belt should be expected to remain open and undeveloped indefinitely. The respondent believes that over adherence to the Green Belt 4th Purpose will burden the land at Avon Drive which does not serve any of the Green Belt purposes as illustrated by Figure 7 of TP1 Addendum. There is an inevitability with the plan that the boundaries will be changed over and over again. By not providing safeguarded land QC Hobson further advised CYC that this could give rise to a serious risk of the Local Plan being found unsound if CYC failed to indicate how long term needs cannot be met without encroaching into the green belt.	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0833/LC/TP1Add/1	No		There is no evidence or statement submitted by the LPA in the Local Plan process to indicate that they have considered any alternative approach to the green belt proposals.	George E Wright
PMSID 0833/LC/TP1Add/2	No		The evidence base should be shared with adjoining authorities as part of the Duty to Co-operate and there is no indication the material labelled 'new evidence' has been the subject of a review of that Duty to Cooperate requirement .	George E Wright
PMSID 0841/LC/TP1Add/1	No			Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0870/LC/TP1Add/1	No		The Green Belt has been altered around Strensall without consultation with property owners	J Philip Coverdale
PMSID 0876-1/LC/TP1Add/1	No		Re: Topic Paper 1 Annex 5 & 6 (all proposed sites in Elvington & Proposed Modifications) and Local Plan 2005 (re Elvington as Green Belt. CYC have not engaged with Elvington Parish Council and the village was not aware of proposal to reduce the green belt until this consultation was launched. The Planning Inspector recommended in 2005 to leave the green belt border.	Joanne Kinder

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0876-3/LC/TP1Add/1	No		Page: 14 Annex 5 – “Exceptional Circumstances: to change the green belt to meet the development needs for housing”. Is not legally compliant: The 1955 introduction of the Green belt system was to urge local councils to restrict urban growth. By reducing green belts from the villages around York City Centre a large conurbation will be established in a few years causing environment and health issues. Has YCC planned for the next 50 years the amount of green belt it intends to keep around and within York city and villages. Will the residents be consulted about this to make changes lawful as currently YCC are using the housing need as the lawful intent to reduce green belt which does not present itself as legally compliant? Duty to Cooperative: the site (ST15) proposed does not present economic commuting routes unless YCC can guarantee access is ONLY on/off from the A64 as the main road through Elvington will be used by this site 's occupants. The Main road through Elvington is already over subscribed by heavy lorries and commuter traffic from villages in the south. YCC will not be able to guarantee that this main road through Elvington will not be used by the Garden Village population in years ahead. Loss of airfield and tourist attractions.	Joanne Kinder
PMSID 0877/LC/TP1Add/1	No		Understand CYC are to remove Elvington from the Green Belt including H39 that has numerous environmental benefits to be replaced by development that will generate adverse conditions in terms of traffic and pollution (also why is there a need for this site when ST15 will provide 3339 homes in the area, The Stables (SP1), land West of Elvington (ST15) - The proposed modifications will profoundly affect Elvington yet CYC on no occasion bothered to consult the parish representatives	James McBride
PMSID 0877/LC/TP1Add/1	No		Understand CYC are to remove Elvington from the Green Belt including Elvington Industrial Estate (E9) extended out over Elvington Park & Conifers. The proposed modifications will profoundly affect Elvington yet CYC on no occasion bothered to consult the parish representatives	James McBride
PMSID 0885/LC/TP1Add/1	No		CYC erroneously seeks to include policy and land designation based on a concept called green wedges, with no mention of green wedges in the NPPF 2012 or 2018..The green belt concept envisages a development exclusion zone beyond the urban area, but this belt was never envisaged to be used as an ultimate development restriction zone right into the centre of the urban area. There are valid reasons for the Ings to be excluded, as CYC ought to use appropriate policy to designate land. However, it is an abuse of power to use a national policy disingenuously by requiring all land to protect the special character of the city of York.	Lime Tree Homes Ltd (Thomas Pilcher)
PMSID 0897-2/LC/TP1Add/1	Yes		Considers plan to be compliant legally and with duty to cooperate	Kieran Packman
PMSID 0908/LC/TP1Add/1	No		PM 40 - Elvington Parish Council have not been sufficiently consulted and views not considered when recommendations in TP1 Addendum - Annex 4 Urban Areas within the General Extent 'not keeping the land permanently open but inset it within the green belt' has been taken.	John Gallery

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PMSID 0909/LC/TP1Add/1	No		The Local Plan is not legally compliant as it does the complete opposite to the Yorkshire & Humberside RSS Revocation order and the saved policies by redefining already detailed green belt boundaries at and beyond the outer green belt boundary by using weak exceptional circumstances. It does not comply with either the 2012 or 2019 NPPF where it proposes development that is not limited infilling in villages. Many people have not received CD013Q - Annex 16 City Wide Leaflet. Also at least one of the boundaries is wrong.	Sophie Bell
PMSID 0917-1/LC/TP1Add/1	No		CYC have not taken into account NPPF 2012/paragraph 112 - economic and other benefits of agricultural land and to use poorer quality land in preference to that of a higher quality.	Thomas Pilcher
PMSID 0918-1/LC/TP1Add/1	No		Page 21, Figure 7 of TP1 shows land not serving the 5 purposes of the green belt and which is neither safeguarded or allocated for housing.	Robert Pilcher
PMSID 0918-1/LC/TP1Add/1	No		Annex 3, Section 5, Boundary 20 does not comply with paragraph 85 of NPPF 2012.	Robert Pilcher
PMSID 0918-1/LC/TP1Add/2	No		Annex 3, Section 5, Boundary 20 CYC has not defined boundaries clearly using physical features. A1237 ring road would make a recognisable and permanent physical feature.	Robert Pilcher
PMSID 0918-1/LC/TP1Add/2	No		Para. 85 NPPF 2012 advises that a green belt should not include land unnecessary to keep permanently open which applies to land north of Avon Drive and as relating to Page 21, Fig. 7 of TP1.	Robert Pilcher
PMSID 0918-1/LC/TP1Add/3	No		Para. 85 NPPF 2012 advises to identify safeguarded land and that this land is identified well beyond the plan period.	Robert Pilcher
PMSID 0918-1/LC/TP1Add/4			Para. 85 NPPF 2012 states that safeguarded land is identified well beyond the plan period. CYC has 5 years but external legal advice suggests 10 years	Robert Pilcher
PMSID 0918-1/LC/TP1Add/5	No		Para. 84 NPPF 2012 advises that greens belts need to promote sustainable patterns of development and para. 85 involves consideration of development needs during the plan period.	Robert Pilcher
PMSID 0918-1/LC/TP1Add/6	No		CYC cannot satisfy themselves (and inspectors) that Green Belt boundaries will not need to be altered at the end of plan period	Robert Pilcher

Soundness

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0023/S/TP1Add/1		Sound	The area between Flaxton Road, Lord's Moor Lane and the railway line should definitely stay green	Kevin Graham Ogilvy
PMSID 0060/S/TP1Add/1		Not Sound	Gypsy and Traveller Accommodation needs cannot be accommodated within land excluded from the Green Belt; additional land is required, however the Topic Paper makes clear that the Council proposes only excluding existing sites from the Green Belt.	Michael Hargreaves Planning OBO York Travellers Trust
PMSID 0073/S/TP1Add/1		Not Sound	CYC have concluded that exceptional circumstances exist and changes to the Green Belt are required to meet development needs for housing employment and education - this logic is unsound due to changing migration trends.	Peter Heptinstall
PMSID 0083/S/TP1Add/1		Not Sound	It does not take a positive approach to community building but seeks to impose housing numbers with little regard to the effect upon the village of Elvington. It is not justified in terms of the most appropriate strategy taking into account alternatives (e.g.. H26 rather than H39). T ils not effective in producing the most acceptable and sustainable solutions e.g. the massive developments at ST15 need to have more assessment and planning especially for transport and traffic. It goes against national policy in terms of engagement with the communities affected and fails to recognise the different roles and character of villages.	Rosemary Tozer
PMSID 0084/S/TP1Add/1		Not Sound	Elvington requires development that respects the character and form of the village. H39 is deemed inappropriate in terms of impact on the village but H26 is welcomed. Earlier comments about H26 appear to have been based solely by looking at a map, this would seem also to be the case with H39. Elvington has a positive role to play as a village within the green belt - affirmed by the Inspector in 1992/3 regarding H39 this was supported at the time by CYC then reversed their position. Elvington values its form and rural character. ST15 will have a massive impact on Elvington as well as its surrounding area.	Tim Tozer
PMSID 0091/S/TP1Add/1		Not Sound	Proposed modifications do not make provision for sufficient housing land for smaller sites.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/S/TP1Add/2		Not Sound	Document TP1 demonstrates site 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 that the site is sustainable.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)

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PMSID 0091/S/TP1Add/3		Not Sound	Proposed Mods June 2019 proposes the retention of H37 within the Green Belt whereas previously it was removed. H37 was previously identified as appropriate land on the fringes of draft green belt, H37 is available now and has no special issues that constrain its use, Not considered consistent as the land was previously identified as suitable for housing.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/S/TP1Add/4		Not Sound	Political interference has resulted in the Local Plan allocating a small number of larger sites for housing. These require big up-front investments in infrastructure & constrains overall supply of housing particularly in the short term. Should be considering all sites, including those that border the green belt, such as H37 to ensure delivery.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0102/S/TP1Add/1		Not Sound	Consider that methodology is wrong which makes the Local Plan unsound.	Elvington Parish Council (David Headlam)
PMSID 0102/S/TP1Add/2			Annex 4, page A4:20. The definition of this area as 'Elvington Industrial Estate' is derisory. There is an industrial area in the heart of the proposed boundary which the Parish Council has supported and has no objections to its inclusion. However, the area proposed to be taken out of the Green Belt is considerably larger and incorporates some 20-25% of the houses within the village. These houses are set back from the road and built with due regard to the Green Belt. It is not appropriate to remove this area from the Green Belt. To remove areas, other than the immediate locales of the business park, from the Green Belt and its associated planning and environmental benefits will damage the residents of the village, damage the economy of York and damage the very image that York seeks to promote of itself.	Elvington Parish Council (David Headlam)
PMSID 0122/S/TP1Add/1		Not Sound	Proposed green belt is unduly restrictive. York Race Course makes a significant contribution to economic and cultural vitality of York, whilst broadly supportive of the plan it should remain possible in future for the race course to evolve and adapt. At present the plan forecloses future opportunities.	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0141/S/TP1Add/1			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. CYC's approach of only assessing selected allocations means that more suitable land has potentially been overlooked and it is not possible to conclude that the Local Plan can be put forward as the most appropriate strategy in terms of overall sustainability. CYC should be in a position where they have the evidence to showcase that they have considered all reasonable alternatives and selected the most suitable and sustainable sites based on evidence, with justification for discounting others.	Avison Young (Andrew Johnson) OBO Oakgate

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PMSID 0141/S/TP1Add/2			A comprehensive Green Belt review is necessary to ensure consistency with the spatial strategy and to ensure that the boundaries will not need to be reviewed again at the end of the plan period in accordance with NPPF paragraph 85. This is the same conclusion that the Inspector for the Leeds City Council Core Strategy reached in September 2014. This is particularly relevant in York because: a) it will be the first time that York's Green Belt has been properly defined; and b) the identified shortfall of employment land identified in Policy EC1.	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0141/S/TP1Add/2			All reasonable opportunities, including the Naburn Business Park site, should be reviewed prior to the allocation of sites. It is not appropriate that only proposed allocations have been considered.	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0150/S/TP1Add/1		Not Sound	CYC must speak with Elvington Parish Council and consider the views of local residents through that council.	Simon Lock
PMSID 0181/S/TP1Add/1			The green belt assessment of land in the vicinity of Sim Balk Lane is erroneous.	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments
PMSID 0196/S/TP1Add/1		Not Sound	The Parish Council has not been consulted about what the village needs, nor has been consulted on proposed fundamental changes to the Green Belt in the parish.	Anneliese Murray
PMSID 0199/S/TP1Add/1		Not Sound	Objection is made to the submission of the 'Approach to Defining York's Green Belt'. The report was prepared at the end of the process rather than the beginning and demonstrates that there were elements of the Green Belt only considered when the report was written, which is unacceptable in plan making terms. It should have been the basis for the process, not a response to the process.	Airedon Planning (Laura Fern) OBO Jolyon Harrison
PMSID 0199/S/TP1Add/2		Not Sound	Objection is made that the report fails fundamentally to consider the restrictions that should be made upon allocating sites, to ensure that these sites cause as little harm, particularly preserving the historic character by the prevention of coalescence.	Airedon Planning (Laura Fern) OBO Jolyon Harrison

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PMSID 0210/S/TP1Add/1		Not Sound	The approach taken of identifying Green Belt boundaries does not make any sense. It is illogical to retrofit allocations of Green Belt land rather than identifying land and excluding land no longer serving Green Belt purposes.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/TP1Add/2		Not Sound	There is no transparent logic or justification as to how sites are identified and their respective boundaries been defined. No comparison of allocated sites and not possible to confirm whether sites are the most appropriate for development.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/TP1Add/3		Not Sound	In absence of identifying additional land for development needs out with the Green Belt boundary, Council's Local Plan risks not being able to deliver sufficient sites over its period. Council's is therefore not in accordance with the NPPF to meet delivery of sustainable development. No evidence as to why safeguarded land has not been identified.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/S/TP1Add/4		Not Sound	Council's not in accordance with the NPPF by not identifying land outwith the Green Belt boundary to meet delivery of sustainable development	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0213/S/TP1Add/1		Sound	No issues to raise.	Hambleton District Council (James Campbell)
PMSID 0214/S/TP1Add/1		Not Sound	Regional Policy has established the general extent of the Green Belt. We agree with the second part of the Inspectors question, that in establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF. In other words, it is not a question of what land should be taken out of the Green Belt. The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development. The Council has therefore misunderstood and wrongly applied NPPF policy. The erroneous approach taken by the Council to defining the Green Belt boundaries has serious consequences in its attitude to meeting the needs for sustainable development over the plan period because it has resulted in an overly restrictive approach to identifying land for housing and other development needs on the mistaken assumption the those development needs had to constitute “exceptional circumstances”.	ONEILL Associates (Eamonn Keogh) OBO Wendy & Richard Robinson

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0214/S/TP1Add/2		Not Sound	Paragraph 85 of the NPPF advises that when defining Green Belt boundaries for the first time, local planning authorities should identify areas of 'safeguarded land' between the urban area and the Green Belt, to meet longer-term development needs beyond the plan period and make clear that the safeguarded land is not allocated for development at the present time. The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.	O'Neill Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0214/S/TP1Add/3		Not Sound	The Council has to demonstrate that the Green Belt boundaries will not have to be altered at the end of the plan period. The Draft Plan has not allocated adequate land to meet housing or employment needs with the plan period and has failed to exclude land to meet longer-term development needs stretching well beyond the plan period as recommended by paragraph 85 of the NPPF.	O'Neill Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0220/S/TP1Add/1		Not Sound	We believe that the Local Plan is not trying to establish new Green Belt, nor should it be seeking to establish new Green Belt. Regional Policy has established the general extent of the Green Belt and the role of the Local Plan is clearly set out in saved regional planning policies which have been accepted and endorsed by Inspectors on appeal. The purpose of the Local plan is to define the inner and outer boundaries.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson
PMSID 0220/S/TP1Add/2			The Council does not have to demonstrate any exceptional circumstances for establishing new Green Belt. In establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as for the Moor Lane Site (Former SF5 - Copmanthorpe), for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson
PMSID 0220/S/TP1Add/3			It will help in understanding this process to be aware that there is a key omission in saved Regional Policy YH9C. The full wording of Policy YH9C in the 2008 included the sentence "The boundaries must take account of the levels of growth set out in this RSS and must also endure beyond the Plan period." The sentence, for whatever reason, never made it into the saved policy – possibly because it refers to "levels of growth" that were not saved. However, the intention is clear, and the inescapable logic of the current process is that in defining the detailed Green Belt boundaries, the Council must exclude land required to meet the growth of the City. In defining/establishing boundaries the Council must meet the identified requirement for sustainable development, i.e. it must allocate land to meet identified needs for housing, employment, leisure and other needs.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson
PMSID 0220/S/TP1Add/4			The Council has therefore misunderstood and wrongly applied NPPF policy. NPPF advises when defining GB boundaries for 1st time LPAs should identify safeguarded land. Failure to do so by CYC is a fundamental flaw and will not meet longer term development needs as recommended.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson

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PMSID 0220/S/TP1Add/5			The Council has therefore misunderstood and wrongly applied NPPF policy. Our view is that a substantial amount of additional housing land will need to be allocated if the Council is to meet housing requirements and confirm a permanent Green Belt for York. The proposed Green Belt boundaries will not endure beyond the Plan period and the Plan is therefore not compliant with the NPPF.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson
PMSID 0221/S/TP1Add/1		Not Sound	Minor modifications have profound implications for Elvington yet CYC has not consulted with elected representatives of the parish. The Parish Council has held 3 public sessions to gather opinions and has consulted informally with many residents. Parish Council does not oppose new residential or industrial developments, but has never been consulted about what the village needs, or about the fundamental changes to the Green Belt. Parish Council needs to be consulted about the villagers views.	Sally Firth
PMSID 0231/S/TP1Add/1		Not Sound	Disputes the validity of the Council putting forward such voluminous new evidence after the submission of the Plan. The Addendum and its Annexes contain substantial new evidence and positions which the Council has not previously advanced. Several guidance documents point to the inapplicability of this new evidence	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/TP1Add/2		Not Sound	Important that the Local Plan is based upon a full and comprehensive appraisal of which areas of land make a significant contribution to Purpose 4 as a primary purpose. Without such an appraisal, any decisions about sites suitable for development and whether exceptional circumstances exist must be inherently flawed. Despite this, the TP1 Addendum accepts that there has not been a full and comprehensive appraisal of the areas important to Purpose 4. This constitutes a major failure of the information base as Purpose 4 is the primary purpose of the Green Belt	Fulford Parish Council (Rachel Robinson)
PMSID 0231 /S/TP1Add/3		Not Sound	Disputes that Figure 3 (the appraisal map) identifies all the "most important" areas contributing to the setting and special character of York. 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. Extensive representations about this matter made at Publication stage. Failed to properly assess the areas important to the setting and special character of the historic town and, as such, is not a sound basis for making decisions on Green Belt boundaries or development allocations	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/TP1Add/4		Not Sound	Accessibility may be an important measure of sustainability. However, by itself, it is not a good indicator of whether development would constitute "unrestricted sprawl". Purpose 1 is better understood as seeking to prevent the development of land which is not well-related to the existing urban pattern and may create a precedent for future unplanned development. It can only be mapped by examining each parcel of land around the urban area and applying an informed judgement. Considers that Figure 4 is not an adequate basis to assess land which is important to achieve Purpose 1.	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/TP1Add/5		Not Sound	Accepts that Figure 5 does identify the most narrow gaps between settlements around York. However the boundaries appear arbitrarily drawn and exclude land which fulfils a separation purpose. Figure 5 is also flawed because it does not recognise that there are other areas of open land important for the separation of settlements	Fulford Parish Council (Rachel Robinson)

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PMSID 0231/S/TP1Add/6		Not Sound	The countryside is normally defined as open areas where rural land uses predominate. It is not confined just to areas important for wildlife, recreation and green infrastructure. Indeed, such areas are generally protected from development by designations other than Green Belt. Figure 6 is of little or no value to defining Green Belt boundaries. The only possible conclusion is that the Council has not carried out a proper exercise to identify those areas important to Purpose 3.	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/TP1Add/7		Not Sound	There is no clear way of understanding how the identified areas of land in Figure 7 have been derived from Figures 3 to 6. No explanation how this figure relates to the Submission Local Plan. Addendum has not properly considered which areas of open land make important contributions to Green Belt purposes and require to be kept permanently open.	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/TP1Add/8		Not Sound	Agrees that the Council must demonstrate exceptional circumstances to justify altering the general extent of the Green Belt and that the judgement case referenced in para 7.110 sets out the relevant matters which need to be taken into account. The only other matter which should be taken into account is the extent of harm to other planning interests which the Green Belt alteration(s) would cause, including to wider environmental interests. However, Council's assessment of the acuteness of need has not been properly justified, the quantum of housing releases proposed from the Green Belt has not been justified, paragraphs 7.116 and 7.117 do not present a credible assessment of the extent of the harm to Green Belt purposes of the Council's proposals, the Addendum does not refer to the alternative open to the Authority which is to not fully meet its identified housing and employment needs, neither has CYC properly explored with the neighbouring authorities whether some of York's housing needs could be met more sustainably beyond the Green Belt, there has been no proper site selection exercise to choose the sites which would cause least harm to Green Belt and wider planning interests. TP1 Addendum has failed to demonstrate the exceptional circumstances to justify the Local Plan's proposed Green Belt changes	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/TP1Add/9		Not Sound	Annex 4 is flawed in its approach. Makes no such evaluation of the impacts on the Green Belt of future development in the identified "urban areas".	Fulford Parish Council (Rachel Robinson)
PMSID 0231/S/TP1Add/10		Not Sound	Annex 5 seeks to evaluate each of the proposed strategic sites against the five Green Belt purposes. However it does so only by applying the criteria set out in Section 4 of the main Addendum. Have shown that these criteria are inherently flawed. It must follow if we are correct that all the appraisals of the individual sites are similarly flawed and cannot be relied upon. Annex 5 is seriously defective in its assessment of the impacts on the Green Belt of the development of ST15 and ST27. There would be significant harm. Detailed comments provided.	Fulford Parish Council (Rachel Robinson)
PMSID 0260/S/TP1Add/1			Strensall can still accommodate development. In 2014 Preferred Options document their client's site was allocated as safeguarded land site reference SF1. This land is still available, wish to stress that just part of the site to the north of the railway lane could be allocated. This would mean re-drawing the green belt boundary but would be a permanent and clear border.	Pegasus Group (Emma Ridley) OBO Lovel Developmensts Ltd

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0261/S/TP1Add/1		Not Sound	Do not believe the Plan to be sound as it is suggesting the removal of Elvington from the green belt whilst suggesting other similar villages like Knapton as being proposed as becoming green belt.	Amanda Moore
PMSID 0263/S/TP1Add/1			Harrogate Borough Council has previously raised concerns regarding the longevity of the Green Belt boundary. City of York Council will need to satisfy itself that the approach it is taking will meet the tests of soundness.	Harrogate Borough Council (Tracey Rathmell)
PMSID 0333/ S/TP1Add/2			A modification is being proposed for the green belt which is NOT listed in the proposed modifications. I oppose the removal of green belt status in Elvington.	Alison Stead
PMSID 0339/S/TP1Add/1		Not Sound	The Council's approach - try to establish the Green Belt boundary and then amend it prior to it being formally adopted in the first place is fundamentally wrong. The Council simply need to define a boundary balancing the needs of the city and the appropriate tests in the Framework, without the need to consider exceptional circumstances. The RSS is not a Local Plan and therefore did not establish the boundaries of the Green Belt, therefore it is the purpose of this plan to do that for the first time. Given the only way to establish a boundary is through a Local Plan and this has never happened it is clear that they cannot be altered, therefore the test of exceptional circumstances is simply not relevant. The purpose of this Local Plan is to establish the boundary, it will be for future local plans to determine if they should be altered.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0339/S/TP1Add/1		Not Sound	Considers the Council's methodology and approach to undertaking a Green Belt assessment to be sound and logical and therefore offer support to the approach. However, in the case of Manor Heath, Copmanthorpe (ST12), the Council have not proposed to allocate the site for housing despite the site being in an area of land which the Council determines does not need to be kept permanently open, and as such does meet the purposes of retaining land within the Green Belt. Our Client objects to the Council's decision not to allocate the site for residential purposes, particularly given how well it performs against the Council's own Strategic Green Belt Assessment. It is noted that land at Tadcaster Road, Copmanthorpe (ST31), performs more poorly on the Council's own Green Belt Assessment yet is still included as an allocation for development. As such, our Client considers the Council's approach to the allocation of sites in Copmanthorpe is not sound as it fails to meet the tests set out in paragraph 35 of the Framework, namely it is not justified, effective or consistent with national policy.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0339/S/TP1Add/2		Not Sound	Given it is the purpose of this plan to establish green belt boundaries for the first time the appropriate NPPF paragraphs to consider are 84 and 85. Re para 84 - as it is defining the boundary for the first time the plan can define boundaries on the urban area and inset towns and villages in a way that allows development to take place in these areas rather than tightly defining boundaries. Para 85 talks of meeting identified requirements for sustainable development and ensuring Green Belt boundaries will not need to be altered at the end of the development plan period. It is clear that the Council do not necessarily need to draw the Green Belt boundary tightly around existing built form.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0339/S/TP1Add/3		Not Sound	The general extent of the Green Belt is noted at the start of the Green Belt chapter in the Framework, simply stating that it is established. However, the Framework confirms that it is for the local plan to define boundaries and exceptional circumstances are needed to amend boundaries, not the general extent. The Councils reasoning for needing to show exceptional circumstances to remove land from the general extent is therefore unsound.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0339/S/TP1Add/4		Not Sound	The main focus in section 4 relates to the five purposes of Green Belt, with no reference to the other guiding principles when defining boundaries. This is an appropriate starting point, however the implementation of the Councils findings is considered wrong and land which is not considered necessary to be kept permanently open is included in the Green Belt. Figure 7 provides a plan overlaying all of the assessment information and identifying the overall area that is considered necessary to be kept permanently open. It is noted that both New Lane, Huntington (ST11) and Manor Heath Copmanthorpe (ST12) both are included in the white areas on this plan, showing that the land is not necessary to be kept permanently open. Similarly, a large part of the land at Metcalfe Lane (ST7) remains the same, however these conclusions have not been carried through to the allocation of land or defining of boundaries.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0342/S/TP1Add/1		Not Sound	Exceptional Circumstances have been created generically in the main TP1 Addendum before a blanket application to any allocation that needs justification to be removed from the green belt.	Andy Bell
PMSID 0342/S/TP1Add/2		Not Sound	There seems to be an inconsistent approach to defining the Inner and Outer Green Belt Boundaries - the inner boundary is tightly drawn, whereas, the outer boundary is widely recognised as being approx 6 miles and therefore any land beyond that is part of the open countryside but sites have been allocated in settlements that already have detailed boundaries.	Andy Bell
PMSID 0345/S/TP1Add/1			The addendum is incomplete and internally inconsistent. It does not, for example, fully explain all of the analytical and decision making stages that CYC has worked through and, insofar as QEB and the housing to the south is concerned, it, on the one hand, concludes that this does not comprise land that needs to be kept permanently open but, on the other, attempts to justify it now being washed over by the Green Belt. CYCs analysis and justification is flawed and the modification that it is promoting at Strensall is not sound. Nor is it required to be made in order to render the submitted Plan sound.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0347/S/TP1Add/1		Sound	The updated evidence base which sets out the comprehensive approach to and considerations associated with defining the York Green Belt for the first time is effective, justified and consistent with national policy. The document provides a sound basis for identifying the precise inner boundary of the Green Belt, assessing and justifying the chosen boundary by reference to wider studies which speak to the purposes of Green Belt in the York context. The Topic Paper provides a robust piece of evidence to support the plan and provide a clear assessment and rationale for the Green Belt boundary as set out in the plan.	Planning Prospects (Jason Tait) OBO Miller Homes

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PMSID 0362/S/TP1Add/1		Not Sound	Planning proposal questions have been very repetitive and now CYC is having the sites removed from the Green Belt to enable development. The process should be investigated as the (Planning) Inspector deemed the proposals illegal and against National Policy and the residents shouldn't have to keep raising concerns.	Dominic Stevens
PMSID 0364/S/TP1Add/1			Several medium size cities elsewhere in the UK have produced detailed strategies/plans to integrate the development of brownfield and greenfield developments into a coherent whole. These strategies have been driven not just by housing need but by the need to meet sustainability targets and goals. None of the changes here represent this and there has been no work carried out by the Council to explore the options for future development. Specifically the Council has not evaluated the impact of its brownfield policies nor evaluated the potential to create a small number of truly sustainable "green villages". Renaming the land to the West of Elvington lane a Green Village is tokenism of the worst kind.	York Labour Party (Dave Merrett)
PMSID 0886/S/TP1Add/1			Several medium size cities elsewhere in the UK have produced detailed strategies/plans to integrate the development of brownfield and greenfield developments into a coherent whole. These strategies have been driven not just by housing need but by the need to meet sustainability targets and goals. None of the changes here represent this and there has been no work carried out by the Council to explore the options for future development. Specifically the Council has not evaluated the impact of its brownfield policies nor evaluated the potential to create a small number of truly sustainable "green villages". Renaming the land to the West of Elvington lane a Green Village is tokenism of the worst kind.	Rachael Maskell MP for York Central
PMSID 0372/S/TP1Add/1		Sound	Respondent welcomes publication of the Council's justification for its Green Belt boundaries and sites selected for release from the Green Belt for development.	Gladman Developments (Craig Barnes) OBO Gladman Developments
PMSID 0378/S/TP1Add/1		Sound	The general approach to defining York's Green Belt is considered sound. It is clear that CYC have adopted the NPPF para 84 approach whereby the Local Plan should: make as much use as possible of suitable Brownfield sites and underutilised land; optimise development density on such sites, and; determine if neighbouring authorities can accommodate some of the identified need for development. We support the Council's spatial approach and CYC's recognition that the City is incapable of meeting all of their development needs outside the Green Belt (exceptional circumstances).	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0381/S/TP1Add/1		Sound	YWT considers TP1 Addendum to be a thorough and detailed assessment of the Green Belt and the detail involved in defining boundaries.	Yorkshire Wildlife Trust (Sara Robin)

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0412-1/S/TP1Add/1		Not Sound	Planning proposal questions have been very repetitive and now CYC is having the sites removed from the Green Belt to enable development. The process should be investigated as the (Planning) Inspector deemed the proposals illegal and against National Policy and the residents shouldn't have to keep raising concerns.	Louisa Stevens
PMSID 0412-1/S/TP1Add/2		Not Sound	Development will be detrimental to the environment and the village as a whole for reasons such as, infrastructure, road access and congestion, utilities, flooding and wildlife habitat.	Louisa Stevens
PMSID 0418/S/TP1Add/1		Not Sound	The RSS may have put importance on preserving the historic character of the city, but this should not be at the expense of the other 4 Green Belt purposes	Chris Wedgwood
PMSID 0418/S/TP1Add/2		Not Sound	The NPPF does not state any of the Green Belt 5 purposes is more important than any other. No valid justification for CYC to treat any one of the Green Belt 5 purposes with more or less importance than the others	Chris Wedgwood
PMSID 0418/S/TP1Add/3		Not Sound	If a site meets any of the 5 purposes of Green Belt then it is by definition Green Belt	Chris Wedgwood
PMSID 0418/S/TP1Add/4		Not Sound	It is not evidence based and is not consistent with National Policy	Chris Wedgwood
PMSID 0418/S/TP1Add/5		Not Sound	Start the process again	Chris Wedgwood
PMSID 0420-2/S/TP1Add/1		Not Sound	The plan ignores green belt rules governing conservation areas, positioning of Travelling People Sites (SP1), wildlife corridors, a previous planning inspector decision regarding greenbelt status of Elvington Village & The Stables, Elvington.	Jane Moorhouse
PMSID 0420-3/S/TP1Add/1		Not Sound	Elvington village should not become an inset village in the green belt - it has good open views to the surrounding green belt, is a historical village and should be protected. Only the industrial and commercial areas should be treated as non green belt.	Jane Moorhouse
PMSID 0581/S/TP1Add/1		Not Sound	Section 4 of the addendum confirms that the council relies essentially on the 2003 work as underpinning its Green Belt approach. There has been no new field work or assessment to consider whether land originally identified in 2003 as fulfilling one or more Green Belt purposes still does so today. We believe that there have been changes in policy and best practice approach, as well as physical circumstances on the ground, which should have caused the authority to carry out a proper, comprehensive reappraisal of the open land around York and the extent to which it still fulfils Green Belt purposes.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP

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PMSID 0581/S/TP1Add/2		Not Sound	Virtually all the Council's strategic site allocations lie within areas of land identified in Figure 7 as strategic areas to keep permanently open. Thus identification of land fulfilling Green Belt purposes is not a bar to its consideration and identification as a sustainable development site.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/TP1Add/3		Not Sound	A significant portion of Barwood's site lies outside any of the areas identified as fulfilling Green Belt purposes, and crucially outside the area identified as protecting special character and setting (including coalescence). This is land which is regarded as important to keep permanently open in order to protect York's special historic character. The tabulated/pro forma assessment of the inner boundary (section 1, boundary 2 at page A3:9) fails to distinguish between this part of the land, which lies outside any of the areas identified as fulfilling Green Belt purposes, and other land which it considers does meet one or more purposes.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/TP1Add/4		Not Sound	In relation to the wider area of land south of Moor Lane which is shown as contributing to protecting special character and setting, the Council's analysis is flawed and perpetuates previous assertions that views across this land to York Minster justify retaining all the land south of Moor Lane as permanently open. Our representations in April 2018, which are based on detailed fieldwork, demonstrate this to be an inaccurate characterisation of the true picture.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/TP1Add/5		Not Sound	The Council's position on post-Plan provision is not sufficient to obviate the need for a safeguarded land policy, which covers more than purely future housing needs in any event. Strong doubts about the permanence of green belt boundaries being proposed even just to 2037/8 because of overly-optimistic assumptions about the deliverability of many sites, windfall assumptions and capacity of many urban allocations.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/TP1Add/6		Not Sound	It is clear that York's future housing, employment and other development needs over an extended period of time can only be achieved through release of land from the general extent of the Green Belt established in RSS. We are quite clear and agree with the Council that exceptional circumstances exist which necessitate Green Belt release. The extent of release needed depends partly on the level of need which the Plan requires to be met (which we consider to be an underestimate currently) and the robustness of its assumptions around windfall sites and urban capacity generally.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0581/S/TP1Add/7		Not Sound	Although a key purpose of this document is to illuminate and detail the means by which site allocations in the Green Belt were chosen in our view the Addendum fails to do so. The process of site selection, from a Green Belt perspective, remains obscure and not justified, and this is a significant failing of the Plan. By way of example, as noted earlier, Annex 3 identifies a significant portion of the Barwood objection site at Moor Lane as lying outside any area identified in the Council's evidence base as being important to keep permanently open and is not allocated. By contrast Site ST31 (land at Tadcaster Road, Copmanthorpe) (7.5 ha, 158 dwellings) lies partly within an area identified as important to prevent sprawl, and partly within an area protecting special character and setting (including coalescence) yet is allocated for development. Methodology is clearly inconsistent.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP

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PMSID 0589/S/TP1Add/1		Not Sound	Regional Policy has established the general extent of the Green Belt. We agree with the second part of the Inspectors question, that in establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF. The inescapable logic of the current process is that in defining the detailed Green Belt boundaries, the Council must exclude land required to meet the growth of the City. In other words, it is not a question of what land should be taken out of the Green Belt. The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development.	ONEILL Associates (Eamonn Keogh) OBO Malton Road Developments Ltd
PMSID 0589/S/TP1Add/2		Not Sound	The erroneous approach taken by the Council to defining the Green Belt boundaries has serious consequences in its attitude to meeting the needs for sustainable development over the plan period because it has resulted in an overly restrictive approach to identifying land for housing and other development needs on the mistaken assumption the those development needs had to constitute “exceptional circumstances”. This has, in turn, resulted in an erroneous approach to the issue of safeguarded land.	ONEILL Associates (Eamonn Keogh) OBO Malton Road Developments Ltd
PMSID 0589/S/TP1Add/3		Not Sound	The Council has to demonstrate that the Green Belt boundaries will not have to be altered at the end of the plan period. The Draft Plan has not allocated adequate land to meet housing or employment needs with the plan period and has failed to exclude land to meet longer-term development needs stretching well beyond the plan period as recommended by paragraph 85 of the NPPF.	ONEILL Associates (Eamonn Keogh) OBO Malton Road Developments Ltd
PMSID 0589/S/TP1Add/4		Not Sound	Market evidence indicates there is strong and unfulfilled demand for employment floor space in the District. There is a need for employment land to meet the requirements of small indigenous businesses for reasonably cheap premises that are priced out of the urban area by demand for residential land. There is a need to have land available to meet potential major inward investment requirements. The cautious approach of the Draft Plan fails to meet this objective.	ONEILL Associates (Eamonn Keogh) OBO Malton Road Developments Ltd
PMSID 0589/S/TP1Add/5		Not Sound	Paragraph 85 of the NPPF advises that when defining Green Belt boundaries for the first time, local planning authorities should identify areas of ‘safeguarded land’ between the urban area and the Green Belt, to meet longer-term development needs beyond the plan period and make clear that the safeguarded land is not allocated for development at the present time. The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.	ONEILL Associates (Eamonn Keogh) OBO Malton Road Developments Ltd

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PMSID 0590/S/TP1Add/1		Not Sound	In the Inspectors letter to CYC of 25th July 2018 they commented The Local Plan... Proposes to designate land as Green Belt and delineate Green Belt boundaries. The Inspectors letter also posed a number of questions including ' is the Local Plan proposing to establish any new Green Belt? If so what are the exceptional circumstances for doing so? And, If not does (The Plan) propose to remove any land from any established Green Belt? If it does is it necessary to demonstrate that exceptional circumstances exist to warrant this approach? We believe thatYC C is not trying to establish new green Belt - the role of the Plan is clearly set in the saved policies of the RSS - the purpose is to set inner and outer boundaries. Given this CYC does not have to demonstrate any exceptional circumstances. It follows that the exclusion of land from Green Belt (e.g. ST15) is fundamentally a matter for establishing GB boundaries rather than altering them. CYC have misunderstood NPPF Policy and has serious consequences for sustainable development and is an overly restrictive approach to identifying land for housing and erroneous approach to safeguarded land. Para 85 of the NPPF allows for identification of Safeguarded Land when defining GB boundaries to meet long term development needs. Failure by CYC to address this requirement goes to the soundness of the Plan. CYC have not allocated adequate land for housing or employment needs	York and North Yorkshire Chamber of Commerce (Susie Cawood)
PMSID 0592/S/TP1Add/1		Not Sound	We believe that the Local Plan is not trying to establish new Green Belt, nor should it be seeking to establish new Green Belt. The role of the Local Plan is clearly set out in saved regional planning policies and has been accepted and endorsed by Inspectors on appeal. The purpose of the Local plan is to define the inner and outer boundaries. The Council does not have to demonstrate any exceptional circumstances for establishing new Green Belt. Regional Policy has established the general extent of the Green Belt. In establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as for the Church Balk site, for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF. A key omission in saved Regional Policy YH9C The boundaries must take account of the levels of growth set out in this RSS and must also endure beyond the Plan period. The sentence in bold, for whatever reason, never made it into the save policy – possibly because it refers to “levels of growth” that were not saved. However, the intention is clear, and the inescapable logic of the current process is that in defining the detailed Green Belt boundaries, the Council must exclude land required to meet the growth of the City. The Green Belt boundaries around York are being defined (or established) for the first time. They are not being altered. In this case, paragraph 85 of the NPPF is the key advice to be considered. In defining/establishing boundaries the Council must meet the identified requirement for sustainable development, i.e. it must allocate land to meet identified needs for housing, employment, leisure and other needs. This is precisely what the missing sentence of Policy YH9C was referring to. The Council has therefore misunderstood and wrongly applied NPPF policy.	Oneill Associates (Graeme Holbeck) OBO Yorvik Homes
PMSID 0600/S/TP1Add/1		Not Sound	With housing need incorrectly revised downwards the site ST13 Land off Moor Lane Copmanthorpe has been removed from the plan. Oppose deletion of this site, has previously been found suitable for development.	DPP (Mark Lane) OBO Shepherd Homes

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PMSID 0601/S/TP1Add/1		Not Sound	Local Plan does not provide sufficient housing land to meet a properly formulated assessment of objective need and those sites identified will not deliver the units identified, Therefore the respondent considers that the Local Plan is unsound and will not be effective and therefore does not deliver sustainable development in accordance with national policy.	DPP Planning (Claire Linley) OBO PJ Procter
PMSID 0603/S/TP1Add/2		Not Sound	Independent assessment shows that CYC should allocate additional sites, even if this necessitates Green Belt release.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0604/S/TP1Add/1		Not Sound	No clear approach to green belt definition has been taken, variety of documents over the course of 16 years. Green Belt Addendum is an attempt to retrofit the evidence base to boundaries that were already selected in 2005.	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)
PMSID 0607/S/TP1Add/1		Not Sound	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.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0607/S/TP1Add/2		Not Sound	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. 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.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0607/S/TP1Add/3		Not Sound	The TP1 Addendum sets out how the 5 purposes of Green Belt have been applied to CYC area. 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. There is a lack of transparency as to how the findings within the document have resulted in the Green Belt boundaries identified.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0611/S/TP1Add/1		Not Sound	Addendums should be for corrections or clarifications, the changes being proposed are far more significant than this. The modifications being proposed to the boundaries should not need to be introduced at such a late stage in the process, as the work should have been completed before the Plan was finalised and submitted for Examination. Evidence now presented through the Addendum is pertinent to decisions that were made at previous stages of the Plan process. Given that the Addendum has only just been produced then the Plan, as submitted, cannot be considered to have been drafted on the necessary evidence required for the Plan to be effective or justified.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd

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PMSID 0611/S/TP1Add/2		Not Sound	The Addendum only assesses the allocations found in the submitted local plan where the site sits within the general extent of the Green Belt, or else the inner and outer boundary. There is no general assessment as to whether any other land fails to fulfil the purposes of Green Belt policy, and should be actively excluded, such as the land identified at earlier stages of the process for safeguarding.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd
PMSID 0611/S/TP1Add/3		Not Sound	Current consultation only allows comments on new evidence and the proposed modifications, rather than the Plan in general. With new evidence and modifications being proposed that have such significant implications this is entirely inadequate and risks the whole plan being found unsound.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd
PMSID 0611/S/TP1Add/4		Not Sound	Permanence of green belt boundaries has still not been resolved. Abandoning the provision of safeguarded land in favour of just allocating additional land with the expectation this will meet 5 years future demand is inadequate and will likely prove insufficient. Boundaries seem unlikely to remain permanent or endure beyond the plan period which is counter to the NPPF.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd
PMSID 0612/S/TP1Add/1		Not Sound	Addendums should be for corrections or clarifications, the changes being proposed are far more significant than this. The modifications being proposed to the boundaries should not need to be introduced at such a late stage in the process, as the work should have been completed before the Plan was finalised and submitted for Examination. Evidence now presented through the Addendum is pertinent to decisions that were made at previous stages of the Plan process. Given that the Addendum has only just been produced then the Plan, as submitted, cannot be considered to have been drafted on the necessary evidence required for the Plan to be effective or justified.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)
PMSID 0612/S/TP1Add/2		Not Sound	The Addendum only assesses the allocations found in the submitted local plan where the site sits within the general extent of the Green Belt, or else the inner and outer boundary. There is no general assessment as to whether any other land fails to fulfil the purposes of Green Belt policy, and should be actively excluded, such as the land identified at earlier stages of the process for safeguarding.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)

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PMSID 0612/S/TP1Add/4		Not Sound	Permanence of green belt boundaries has still not been resolved. Abandoning the provision of safeguarded land in favour of just allocating additional land with the expectation this will meet 5 years future demand is inadequate and will likely prove insufficient. Boundaries seem unlikely to remain permanent or endure beyond the plan period which is counter to the NPPF.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)
PMSID 0614/S/TP1Add/1		Not Sound	Addendums should be for corrections or clarifications, the changes being proposed are far more significant than this. The modifications being proposed to the boundaries should not need to be introduced at such a late stage in the process, as the work should have been completed before the Plan was finalised and submitted for Examination. Evidence now presented through the Addendum is pertinent to decisions that were made at previous stages of the Plan process. Given that the Addendum has only just been produced then the Plan, as submitted, cannot be considered to have been drafted on the necessary evidence required for the Plan to be effective or justified.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd
PMSID 0614/S/TP1Add/2		Not Sound	The Addendum only assesses the allocations found in the submitted local plan where the site sits within the general extent of the Green Belt, or else the inner and outer boundary. There is no general assessment as to whether any other land fails to fulfil the purposes of Green Belt policy, and should be actively excluded, such as the land identified at earlier stages of the process for safeguarding.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd
PMSID 0614/S/TP1Add/3		Not Sound	Current consultation only allows comments on new evidence and the proposed modifications, rather than the Plan in general. With new evidence and modifications being proposed that have such significant implications this is entirely inadequate and risks the whole plan being found unsound.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd

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PMSID 0614/S/TP1Add/4		Not Sound	Permanence of green belt boundaries has still not been resolved. Abandoning the provision of safeguarded land in favour of just allocating additional land with the expectation this will meet 5 years future demand is inadequate and will likely prove insufficient. Boundaries seem unlikely to remain permanent or endure beyond the plan period which is counter to the NPPF.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd
PMSID 0620/S/TP1Add/1		Not Sound	The Councils has wrongly interpreted National Planning Policy when defining Green Belt Boundaries. Green Belt boundaries are not defensible because insufficient land has been excluded from the Green Belt to meet development needs during and beyond the 16-year Plan period.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0620/S/TP1Add/1		Not Sound	Regional Policy has established the general extent of the Green Belt. We agree with the second part of the Inspectors question, that in establishing the Green Belt boundaries for the first time, it follows that the exclusion of land from the Green Belt – such as at the 'garden villages', for example – is fundamentally a matter of establishing Green Belt boundaries rather than altering them, in the terms of paragraph 83 of the NPPF. In other words, it is not a question of what land should be taken out of the Green Belt. The Council is at the point of deciding what land should not be included in the Green Belt in order to meet the identified requirements for sustainable development. The Council has therefore misunderstood and wrongly applied NPPF policy. The erroneous approach taken by the Council to defining the Green Belt boundaries has serious consequences in its attitude to meeting the needs for sustainable development over the plan period because it has resulted in an overly restrictive approach to identifying land for housing and other development needs on the mistaken assumption the those development needs had to constitute “exceptional circumstances”.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0620/S/TP1Add/2		Not Sound	Paragraph 85 of the NPPF advises that when defining Green Belt boundaries for the first time, local planning authorities should identify areas of ‘safeguarded land’ between the urban area and the Green Belt, to meet longer-term development needs beyond the plan period and make clear that the safeguarded land is not allocated for development at the present time. The failure of the Council to address this requirement is a fundamental failing of the Local Plan and goes to the heart of the Soundness of the Plan.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0620/S/TP1Add/3		Not Sound	The Council has to demonstrate that the Green Belt boundaries will not have to be altered at the end of the plan period. The Draft Plan has not allocated adequate land to meet housing or employment needs with the plan period and has failed to exclude land to meet longer-term development needs stretching well beyond the plan period as recommended by paragraph 85 of the NPPF.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0826-1/S/TP1Add/1		Not Sound	Areas of land identified as not essential for permanence in Figure 7 of TP1 have been 'unnecessarily kept permanently open'	Thomas Pilcher Homes (Thomas Pilcher)
PMSID 0827-2/S/TP1Add/1		Not Sound	Regarding permanence of green belt, government wants a green belt to be robust and the respondent believes formation of a green belt to the inner boundaries should not 'necessarily include land which is not necessary to be designated'. Council should designate safeguarded land between the urban edge and the inner boundary of the green belt using identifiable, defensible and clear boundaries. The tighter the inner boundary is to the urban fringe the less opportunity there is for sustainable patterns of development without specific release of green belt land. John Hobson QC stated that 'there is no finite period for a Plan to endure.... land which is designated as Green Belt should be expected to remain open and undeveloped indefinitely'. Additionally, Hobson thought a period suitable for 'well beyond' as stated in the Plan would be 10 years beyond 2032. Lacking a permanence, it is an inevitability that the Green Belt boundaries will be changed over and over as the housing demand persists. The respondent agrees with Hobson's opinion that 'if no safeguarded land is identified in the local plan this would give rise to a serious risk of the Plan being found unsound' due to the necessity of meeting long term needs by encroaching into the green belt.	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0833/S/TP1Add/1		Not Sound	Para 158 of NPPF 2012 requires that Local Plans should be based on adequate, up-to-date information. The 2003 material is not compliant as it was not relevant to the RSS policy and relevant evidence. The fundamental evidence base upon which the Plan was predicated in respect of Green Belt proposal is that set out in documents dated 2003.	George E Wright
PMSID 0833/S/TP1Add/2		Not Sound	The Local Plan Green Belt proposals are not based on proportionate evidence or any credible evidence at all. Topic Paper 1 its Addendum and Annexes is no more than post submission justification. The Inspectors are requested to declare it unsound forthwith and request the LPA to withdraw the Plan. If the material submitted by the LPA post submission of the Plan is considered to be evidence, it should be accorded very limited weight.	George E Wright
PMSID 0833/S/TP1Add/3		Not Sound	In the Addendum the LPA attempt to argue that all 5 purposes should be applied and also that these should be given equal weight to the purpose defined in the overarching RSS policy. This is misconceived and unfounded. There is only one purpose for the YGB, that is related to preventing harm to the historic character of the city.	George E Wright
PMSID 0833/S/TP1Add/4		Not Sound	The resolution of the YGB boundaries - particularly the issue of the inner boundary - is fundamental to the soundness of the plan as the allocation of land for development should flow from that outcome not dictate it	George E Wright

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0833/S/TP1Add/5		Not Sound	The Addendum (Paras 2.2 and 2.3) state no new Green Belt is proposed. The conclusion of this response is that statement is patently and demonstrably incorrect. The submission Plan proposes Green Belt that is significantly greater in area than the area of the green belt prescribed in accordance with RSS Policies YH9 and Y1 and the key diagram. Proposal to take the green belt to the District boundaries is a proposal for Green Belt not covered by the general extent policies, therefore, that area which is additional to the area that would arise under a correct application of the policy, constitutes new Green Belt and should be supported by exceptional circumstances. None are provided.	George E Wright
PMSID 0833/S/TP1Add/6		Not Sound	The evidence base of the Plan including the 'new' evidence does not indicate that any of the alternative approaches have been considered as alternative options or in fact that any alternative options for the green belt have been considered in the Plan process. For this reason, the Plan is not justified.	George E Wright
PMSID 0833/S/TP1Add/7		Not Sound	Nothing in the submitted material seeks to identify that the evidence existed prior to submission. Government guidance on plan-making states that evidence needs to inform what is in the plan and shape its development rather than be collected retrospectively.	George E Wright
PMSID 0833/S/TP1Add/8		Not Sound	The Green Belt proposals are simply a re-hash of the 1998 Local Plan proposals The 1998 Proposals were found to be unsound and were effectively rejected by the Local Plan Inspectors.	George E Wright
PMSID 0841/S/TP1Add/1		Not Sound	Topic Paper TP1 (The Approach to Determining Green Belt Boundaries), its Addendum and Annexes have not informed the Submission draft green belt and present only a partial exercise. As part of an iterative process any significant change should result in a review of the plan as a whole, to identify and assess any consensequential changes (Knock on effects). In not doing this the modifications are not justified.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0841/S/TP1Add/2			Agree with the response set out by Mr Wright that no justification has ever been provided to how the purpose of the York Green Belt (to safeguard the special character and setting of the historic city) as set by the RSS Saved policy YH9 has become subsumed within the other PPG2/NPPF green belt purposes, all of which the Council now considers to be of equal importance.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0841/S/TP1Add/3			The detailed explanation of the outer green belt boundaries are only evidence that there are features on the ground with a degree of permanance which might be appropriate to use in defining the outer green belt but are not justification of the extent ogf the green belt in these areas. Wheldrake lies well beyond the 'about 6 mile' green belt and has no inter-visibility to the York Urban area.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0841/S/TP1Add/4			In the current Local Plan exercise the Council appears never to have asked itself "How should the York Green Belt be defined in a manner which best safeguards the special character and setting of the historic City" and encompass sustainable patterns of development - which was specifically not a consideration the the York Green belt Local Plan Inspector.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0841/S/TP1Add/5			In the current Local Plan exercise the Council appears never to have asked itself "which areas of land surrounding the existing urban area do not serve any green belt purpose?" which has always been a fundamental element ogf defining green belt and was specifically raised in the Inspectors letter of 24th July 2018.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0841/S/TP1Add/6			Saved RSS policy refers only to the Local Plan defining the inner green belt boundary and those parts of the outer boundary not so far defined in adopted Local Plans. It is silent on the matter of inset settlements in the green belt. Is the green belt boundary around proposed garden cillages a green belt boudary established for the first time? If so what is /where is the basis for this in national guidance and Saved RSS policy?	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0841/S/TP1Add/7			It has not been evidensed that a freestanding garden village is justified by exceptional circumstances.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0841/S/TP1Add/8			In conclusion it is clear that the approach has not changed in any fundamental way since the early 1990s York Green Belt Local Plan. Major changes to strategic policies at national and local level have taken place since then requiring a fundamental re-appraisal of settlement hierarchies with an emphasis on promoting sustainable patterns of growth. None of this is reflected in the Council's approach to green belt.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0849/S/TP1Add/1		Not Sound	Based on its vision and growth strategy, and the range of growth scenarios that has been tested, the University has concluded that the remaining land 'allocated for development' at Campus East will be built out well within the shorter plan period. Adequate land needs to be allocated at this time for further extension of campus east, otherwise potential land will be fixed within a permanent Green Belt.	Oneill Associates (Janet O'Neill) OBO University of York
PMSID 0849/S/TP1Add/2		Not Sound	The City Council has accepted that a campus extension site is required during the plan period and draft policies SS22, EC1 and ED3 all facilitate this expansion, and strategic site ST27 is included in the draft plan. However, given even medium range growth rates for the scenarios tested, the 21.5ha extension site in the draft plan would be inadequate. For visual reasons and in order to create a pleasant landscape dominated campus extension, a wide buffer to the A64 would reduce the developable area to 13ha. On recent rates of development of 30ha over 10 years, this would constitute a 4-year land supply.	Oneill Associates (Janet O'Neill) OBO University of York

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TP1 Addendum

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PMSID 0849/S/TP1Add/3		Not Sound	The Local Plan is to be examined, via the transitional arrangements, under guidance in NPPF 2012 which states that Green Belt boundaries should not be confirmed until the demand for sustainable development has been met. On the grounds of identified University growth demands alone, the emerging Local Plan is unsound.	Oneill Associates (Janet O'Neill) OBO University of York
PMSID 0849/S/TP1Add/4		Not Sound	The Council is assuming that the general extent of the Green Belt is established, which is correct. It was established in the Regional Spatial Strategy saved policies 2013. However, they have gone on to 'establish' the inner boundaries in their exercise and then claim that these boundaries can only be altered in 'exceptional circumstances' to meet development needs, as required in paragraph 83 of the NPPF 2012. It is asserted that this is an inappropriate reference because inner boundaries have not yet been fixed and as such paragraph 85 which states "the boundaries should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development" should be adhered to.	Oneill Associates (Janet O'Neill) OBO University of York
PMSID 0849/S/TP1Add/5		Not Sound	Paragraph 85 requires that authorities setting Green Belt boundaries satisfy themselves that: 'Green Belt boundaries will not need to be altered at the end of the development plan period'. TP1 does not set out any consideration of the likely land requirements for the University over the life of the plan or beyond to justify their proposed Green Belt boundaries. The plan period is insufficient to provide a degree of permanence required in paragraphs 83 and 85. No safeguarded land is proposed to serve the years beyond the plan period.	Oneill Associates (Janet O'Neill) OBO University of York
PMSID 0849/S/TP1Add/6		Not Sound	Paragraph 136 of NPPF 2019 is inappropriate and that it is relied upon in error. Inner and outstanding outer Green Belt boundaries have not been established for the city so that they cannot, by definition, be altered. The Council's method of devising Green Belt boundaries without excluding sustainable development land does not, of itself, fix the boundaries. The boundaries only exist as a transitory part of the exercise, and as such cannot be defined as "established Green Belt boundaries" as referred to in paragraph 136 of the 2019 NPPF.	Oneill Associates (Janet O'Neill) OBO University of York
PMSID 0859/S/TP1Add/1		Sound	Respondent supports the green belt boundary adjustment to the NE of Elvington Industrial Estate. Site has a proposed outline planning application which is pending determination. Site proposal has support of Council's Economic Growth Team.	Freeths LLP (David Stanniland) OBO The Lindum Group Ltd
PMSID 0866/S/TP1Add/1		Not Sound	With housing need incorrectly revised downwards the site H28 has been removed from the plan. Oppose deletion of this site, has previously been found suitable for development.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0876- 1/S/TP1Add/1		Not Sound	The Local Plan cannot be considered to be sound or positively prepared if CYC have not engaged the Parish Council or others in the village therefore cannot be considered either to be justified or effective.	Joanne Kinder

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PMSID 0876-3/S/TP1Add/1		Not Sound	The Plan is not positively prepared as future green belt for the city and surrounds has not been established by CYC and pockets of land are proposed to be removed without clear plans for the next 50 years.	Joanne Kinder
PMSID 0877/S/TP1Add/1			Understand CYC are to remove Elvington from the Green Belt including H39 that has numerous environmental benefits to be replaced by development that will generate adverse conditions in terms of traffic and pollution (also why is there a need for this site when ST15 will provide 3339 homes in the area, The Stables (SP1), land West of Elvington (ST15) - The proposed modifications will profoundly affect Elvington yet CYC on no occasion bothered to consult the parish representatives	James McBride
PMSID 0882/S/TP1Add/2		Not Sound	Oppose development of site H39 as it would harm the semi-rural nature of Elvington. Would also mean the loss of Church Lane as a site of recreation and easy access to the countryside. Would also imperil further development on the green belt.	Simon Willis
PMSID 0885/S/TP1Add/1		Not Sound	Areas of land identified as not essential for permanence in Figure 7 of TP1 Addendum have been unnecessarily kept permanently open.	Lime Tree Homes Ltd (Thomas Pilcher)
PMSID 0885/S/TP1Add/1		Not Sound	Local plan includes land which is not necessary to be kept permanently open under the guise of green wedges.	Lime Tree Homes Ltd (Thomas Pilcher)
PMSID 0886/S/TP1Add/1			Several medium size cities elsewhere in the UK have produced detailed strategies/plans to integrate the development of brownfield and greenfield developments into a coherent whole. These strategies have been driven not just by housing need but by the need to meet sustainability targets and goals. None of the changes here represent this and there has been no work carried out by the Council to explore the options for future development. Specifically the Council has not evaluated the impact of its brownfield policies nor evaluated the potential to create a small number of truly sustainable "green villages". Renaming the land to the West of Elvington lane a Green Village is tokenism of the worst kind.	York Labour Group (Dave Merrett)
PMSID 0894/S/TP1Add/1		Not Sound	The TP1 Addendum and original documents do not constitute a comprehensive Green Belt review as they are based on evidence which is out of date and precedes the current and 2012 NPPF.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0897-2/S/TP1Add/1		Sound	Considers Local Plan to be sound	Kieran Packman
PMSID 0897-2/S/TP1Add/2		Sound	Respondent believes those objecting are NIMBY's. Believes school is under subscribed, there is no useful public transport, the sports club is under utilised and the village pub has insufficient patronage. No more than 10 houses a year go onto the market and there is ample space for building new houses.	Kieran Packman

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0900/S/TP1Add/1		Not Sound	Concerned about the sustainability of the Local Plan and it requires further consultation.. I strongly object to building on green belt land.	Jemima Whelan
PMSID 0901/S/TP1Add/1		Not Sound	The Council's approach to defining the Green Belt is flawed, and that the inclusion of Northfields within its boundaries is at odds with the proposed designation of the land for "sports uses in support of the University's development of its multi-million pound centre for sporting excellence via its major construction of buildings and facilities" (para. 7.14, emerging Local Plan). As such, we consider that the inner boundaries of the Green Belt as outlined in 'Topic Paper TP1 Addendum, Annex 3' (ref. Section 5, Boundary 2) of the Proposed Modifications would fail to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.	O'Neill Associates (Phillip Homes) OBO York St John University
PMSID 0901/S/TP1Add/2		Not Sound	Serious concerns about approach to defining the green belt boundary. The Council is defining the inner Green Belt boundaries for the Authority's area for the first time ever without initially assessing longer term development needs to establish permanence to the boundaries, but seeking to impose them at a later stage of the process. The Council is assessing development needs on exceptional circumstances criteria rather than sustainable development requirements which are not required to be 'exceptional'. It is our view that paragraph 136 of NPPF 2019 is inappropriate and that it is relied upon by the Council in error. Inner and outstanding outer Green Belt boundaries have not been established for the city so that they cannot, by definition, be altered. The Council's method of devising Green Belt boundaries without excluding sustainable development land does not, of itself, fix the boundaries. The boundaries only exist as a transitory part of the exercise, and as such cannot be defined as "established Green Belt boundaries" as referred to in paragraph 136 of the 2019 NPPF.	O'Neill Associates (Phillip Homes) OBO York St John University
PMSID 0901/S/TP1Add/3		Not Sound	It is agreed in para 82 of the 2012 NPPF and regional spatial strategies that the general extent of the York Green Belt has been established and the inner and some outer boundaries are now to be fixed. The Council's methodology of defining Green Belt boundaries first and then excluding particular areas for development which had been selected as serving a Green Belt purpose, cannot be seen as setting settlement policy. Thus, it is concluded that paragraph 85 of the NPPF 2012 applies, relating to defining boundaries. The paragraph 83 requirement (second sentence) to only alter Green Belt boundaries in exceptional circumstances is not relevant as the detailed boundaries are yet to be defined. Very special circumstances in paragraph 87 relates to the determination of planning applications once the Green Belt Boundaries have been fixed.	O'Neill Associates (Phillip Homes) OBO York St John University
PMSID 0901/S/TP1Add/4		Not Sound	Paragraph 85 of the NPPF states local planning authorities should "ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development". the proposed inclusion of the Northfields site within the Green Belt would be contrary to the clear and stated policy aims of the plan, and would have an unnecessarily restrictive and detrimental effect on the long-term growth prospects of the University and its ability to improve facilities at its Sport Park in the future.	O'Neill Associates (Phillip Homes) OBO York St John University

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PMSID 0908/S/TP1Add/1		Not Sound	The lack of proper consultation with the Parish Council and Residents of Elvington is unacceptable. The changes to remove green belt status and change it to inset status is a blatant attempt to allow future decisions to be made without the need to observe national guidelines on green belt developments.	John Gallery
PMSID 0909/S/TP1Add/1			Exceptional Circumstances have been created generically in the main TP1 Addendum before a blanket application to any allocation that needs justification to be removed from the green belt.	Sophie Bell
PMSID 0909/S/TP1Add/2		Not Sound	There seems to be an inconsistent approach to defining the Inner and Outer Green Belt Boundaries - the inner boundary is tightly drawn, whereas, the outer boundary is widely recognised as being approx 6 miles and therefore any land beyond that is part of the open countryside but sites have been allocated in settlements that already have detailed boundaries.	Sophie Bell
PMSID 0913/S/TP1Add/1			The local plan has not taken into account the fragility of our political situation and if Brexit leads to a no deal our food supplies security will become more important. People in York and surrounding areas are becoming more reliant on food banks surely taking more Agricultural land out of production will only make matters worse.	Sally Hawkswell
PMSID 0915/S/SS8(ST4)/1		Not Sound	Respondent concerned about the loss of valuable agricultural land, the livelihood and farming knowledge of its occupants. The destruction of wildlife habitat and eco systems will impact upon an invaluable resource for the whole community such as food security and the personal well being residents derive from their connection with the countryside. The respondent acknowledges there is a demand for housing, but that perhaps CYC has overestimated the requirement. In the current situation of 'climate emergency' building an unsustainable 'garden village' without public transportation would cause further detriment to traffic congestion and air pollution. The respondent believes Green Belt land should be protected in perpetuity and fellow Heslington residents have relayed to the respondent that the local plan is a 'disgrace and shameful'. The respondent hopes that by working together that wise use of existing sites in York could circumvent the impact the development would have upon the conservation area and village of Heslington.	Jeanne Lister
PMSID 0916/S/TP1Add/1		Not Sound	Green belt boundary is unduly restrictive. No clear approach to green belt definition has been taken, variety of documents over the course of 16 years. Green Belt Addendum is an attempt to retrofit the evidence base to boundaries that were already selected in 2005. Green belt boundaries being set will not be permanent.	Carter Jonas (Simon Grundy) OBO Schoen Clinic York Ltd/ The Retreat Living

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TP1 Addendum

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PMSID 0916/S/TP1Add/2			The spatial strategy fails to take into account a realistic objectively assessed housing need and other development land requirements leading to a lack of developable land outside the proposed green belt. The draft plan is also unsound and in conflict with the NPPF as no safeguarded land is proposed to help meet "longer term needs stretching well beyond the plan period".	Carter Jonas (Simon Grundy) OBO Schoen Clinic York Ltd/ The Retreat Living
PMSID 0917-1/S/TP1Add/1		Not Sound	CYC has not addressed NPPF 2012, para. 112 by not seeking to use the least productive land, lacking evidence to properly select the correct land, such as ST9 which is a high agricultural and landscape value to that of the respondent's own land.	Thomas Pilcher
Proposed Modification				
PMSID 0023/Mod/TP1Add/1			The area between Flaxton Road, Lord's Moor Lane and the railway line should definitely stay green	Kevin Graham Ogilvy
PMSID 0075/Mod/TP1Add/1			Representation on the map in annex 5 of ST15 is incomplete. The map of the proposed Langwith Garden Village site ST15 does not fully represent the existing Site of Nature Conservation Interest (SINC) across all of the airfield for skylarks. It is mentioned in the text but is not visually present on the map.	Heslington Parish Council
PMSID 0102/Mod/TP1Add/1			2005 Inspector's review was clear that the Inspector considered Elvington should remain in the Green Belt. To remove Elvington from the Green Belt will remove the protections that Green Belt planning policies and regulations afford to not only the village but everyone that passes through. It will lead to the end of the village of Elvington.	Elvington Parish Council (David Headlam)
PMSID 0118/Mod/TP1Add/1			Disagree that consequential impacts on the purposes of the Green Belt have been ameliorated and reduced to the lowest reasonably practical extent. There are a number of sites where an alternative proposals would reduce the harm the current allocation cause to the primary purpose of the York Green Belt. Amend paragraph 7.117 accordingly.	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/2			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.	Historic England (Ian Smith)

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PMSID 0118/Mod/TP1Add/3			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. Identify the area between Knapton and the A1237 as 'Village setting'	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/4			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. Identify the area between the Wyeville Garden Centre on the A59 and the Northminster Business Park as an 'Area Preventing Coalescence.	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/5			Amend Paragraph 4.17 and 4.18 to reflect the Heritage Topic Paper	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/6			Purpose 1. Page 14. Define what 'large' means in terms of the York Local Plan area and identify those areas around the large urban areas fulfil purpose 1.	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/7			Purpose 1. Page 14. Access to two or more services seems largely irrelevant in terms of this Green Belt purpose. Delete paragraph 4.25,4.26 and figure 4.	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/8			Given that York does not have any 'towns', Purpose 2 is irrelevant. Delete Purpose 2.	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/9			Purpose 3. Page 17. Identify on a map the areas considered to be 'open countryside' and 'urban fringe'	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/10			Purpose 3. Page 17. Natural assets of the city are not relevant to this purpose. Delete paragraph 4.35 to 4.38 and Figure 6 and instead focus on areas which safeguard the countryside from encroachment.	Historic England (Ian Smith)
PMSID 0118/Mod/TP1Add/11			Do not agree that sites which have been identified within the general extent of the Green Belt have been done so without damage to its primary purpose. The sites may have been those which the council consider would have the least harm to the primary Green Belt purpose but they will all, to some extent, damage elements which contribute to the special character and setting of the historic city. Amend paragraph 7.116 accordingly.	Historic England (Ian Smith)
PMSID 0122/Mod/TP1Add/1			Plan should make reference to York Race Course as a 'Major Developed Site' in the York Green Belt as York Designer Outlet and Askham Bryan College are.	Turnberry (Chris Pattison) OBO York Racecourse

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0122/Mod/TP1Add/2			Green belt boundary around York Race Course should be relaxed. Should be more explicitly supportive of hotel developments at existing tourism sites.	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0122/Mod/TP1Add/3			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.	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0122/Mod/TP1Add/4			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 used as a brownfield site for housing. This site was previously submitted during 2015 call for sites but not taken forward.	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0141/Mod/TP1Add/1			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	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0199/Mod/TP1Add/2			The report fails fundamentally to consider the restrictions that should be made on allocating sites. For example it's necessary to stop development between existing villages and the ring road to prevent coalescence with the main urban area of York as it's clearly inappropriate to allow new development closer to the main urban area of York unless there's already a significant landscape structure that would prevent the new development from being seen from the centre of York	Airedon Planning (Laura Fern) OBO Jolyon Harrison
PMSID 0210/Mod/TP1Add/1			Council should identify additional land and define the Green Belt boundary accordingly. Identification of small sites (< 250 dwellings) around existing settlements and main urban area would assist meeting any delivery shortfall of larger sites early in the plan period.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/Mod/TP1Add/3			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.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0210/Mod/TP1Add/4			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.	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0214/Mod/TP1Add/1			Include areas of safeguarded to meet development needs beyond the plan period and ensure permanent green belt boundaries.	ONEILL Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0221/Mod/TP1Add/1			Do not remove Elvington (H39 and Elvington Airfield) from the Green Belt	Sally Firth
PMSID 0260/Mod/TP1Add/2			GB Mod north of railway at Strensall	Pegasus Group (Emma Ridley) OBO Lovel Developmensts Ltd
PMSID 0339/Mod/TP1Add/1			The Council simply need to define a boundary balancing the needs of the city and the appropriate tests in the Framework, without the need to consider exceptional circumstances.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0342/Mod/TP1Add/1			York Green Belt - 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.	Andy Bell
PMSID 0354- 1/Mod/TP1Add/1			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. As a matter of principle therefore, the allocation of this site for housing must be preferred.	Peter Vernon Vernon & Co
PMSID 0362/Mod/TP1Add/1			CYC must stop trying to push through own agenda.	Dominic Stevens

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0362/Mod/TP1Add/2			Stop proposing the same sites over and again in the hopes of residents becoming complacent. Stop trying to remove sites from the Green Belt as a workaround as this is unacceptable	Dominic Stevens
PMSID 0362/Mod/TP1Add/3			Consult with Elvington Parish Council properly, and involve the local Councillor, Cllr Vassie on proposed changes	Dominic Stevens
PMSID 0412-1/Mod/TP1Add/1			Stop proposing the same sites over and again in the hopes of residents becoming complacent. Stop trying to remove sites from the Green Belt as a workaround as this is unacceptable	Louisa Stevens
PMSID 0412-1/Mod/TP1Add/2			Consult with Elvington Parish Council properly, and involve the local Councillor, Cllr Vassie on proposed changes	Louisa Stevens
PMSID 0420-3/Mod/TP1Add/1			Do not treat Elvington Village as an inset village within the green belt.	Jane Moorhouse
PMSID 0581/Mod/TP1Add/8			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.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0587/Mod/TP1Add/1			The site south of Cherry Lane (alt site 132, former H2b) 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.	ONEill Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0589/Mod/TP1Add/1			Include areas of safeguarded to meet development needs beyond the plan period and ensure permanent green belt boundaries.	ONEill Associates (Eamonn Keogh) OBO Malton Road Developments Ltd

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0590/Mod/TP1Add/1			CYC should include areas of safeguarded land to meet the development needs beyond the plan period.	York and North Yorkshire Chamber of Commerce (Susie Cawood)
PMSID 0603/Mod/TP1Add/1			CYC should commit to a full Green Belt review in the interests of releasing sufficient and appropriate land to meet the true housing requirement.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0604/Mod/TP1Add/2			Formally identify safeguarded land in the plan to ensure green belt boundaries retain their permanence beyond the plan period.	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)
PMSID 0607/Mod/TP1ADD/1			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	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0611/Mod/TP1Add/1			Given the implications of such significant new evidence and alterations to the green belt boundary the plan should be withdrawn and regulation 19 consultation held again if the plan is to be found sound.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd
PMSID 0611/Mod/TP1Add/2			If the plan is to be found sound and comply with paragraph 85 of the 2012 NPPF the plan should safeguard land for future development. Without this any green belt boundaries that get set will not be permanent.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Northminster Ltd

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0612/Mod/TP1Add/1			Given the implications of such significant new evidence and alterations to the green belt boundary the plan should be withdrawn and regulation 19 consultation held again if the plan is to be found sound.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)
PMSID 0612/Mod/TP1Add/2			If the plan is to be found sound and comply with paragraph 85 of the 2012 NPPF the plan should safeguard land for future development. Without this any green belt boundaries that get set will not be permanent.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO Joseph Rowntree Housing Trust (JRHT)
PMSID 0614/Mod/TP1Add/1			Given the implications of such significant new evidence and alterations to the green belt boundary the plan should be withdrawn and regulation 19 consultation held again if the plan is to be found sound.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd
PMSID 0614/Mod/TP1Add/2			If the plan is to be found sound and comply with paragraph 85 of the 2012 NPPF the plan should safeguard land for future development. Without this any green belt boundaries that get set will not be permanent.	Directions Planning Consultancy Ltd (Katheryn Jukes) OBO William Birch and Sons Ltd
PMSID 0620/Mod/TP1Add/1			Include areas of safeguarded to meet development needs beyond the plan period and ensure permanent green belt boundaries.	Eamonn Keogh ONeill Associates OBO Galtres Village Development Company
PMSID 0827- 2/Mod/TP1Add/1			If land does not serve any of the five purposes, or, serves some of the purposes to a lesser extent other the fourth purpose, then CYC should or could look to release land (or at least not first burden) which does not serve the fourth purpose.	Pilcher Homes Ltd (Robert Pilcher)

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0827-2/Mod/TP1Add/2			The respondent hopes the examiners will provide a number of years beyond the plan period which provides a correct sense of enduring permanence.	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0827-2/Mod/TP1Add/3			Lastly the respondent would like the examiners to request a calculation for the exact percentage of land which is designated as green belt as no other authority has aimed to designate such a high percentage of land as green belt.	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0869-2/Mod/TP1Add/1			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	Ray Calpin
PMSID 0883/Mod/TP1Add			No specific details provided	O'Neill Associates (Tim Ross) OBO St Peters School
PMSID 0885/Mod/TP1Add/1			Designate local green spaces, flood zones, according to their risk rather than create green wedges	Lime Tree Homes Ltd (Thomas Pilcher)
PMSID 0901/Mod/TP1Add/1			Remove the Northfields site (alt 141) from the green belt, it should be designated for sports use. Omitting the site from Green Belt would not have a significant impact on the Green Wedge on Bootham Stray, as the natural boundary of this wedge runs along the western boundary of Northfields. The site could therefore be excluded from Green Belt land to the east without affecting the wider sense of the openness of the wedge. This would provide a more permanent boundary, with defined and recognisable physical features in accordance with NPPF paragraph 85. Doing so would ensure consistency with Local Plan objectives to support the use and development of the Sports Park.	O'Neill Associates (Phillip Homes) OBO York St John University
PMSID 0909/Mod/TP1Add/1			York Green Belt - 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.	Sophie Bell
PMSID 0916/Mod/TP1Add/1			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	Carter Jonas (Simon Grundy) OBO Schoen Clinic York Ltd/ The Retreat Living

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TP1 Addendum

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0917-1/Mod/TP1Add/1			Apply a NPPF 2012 paragraph 112 compliant analysis to all land not identified with green on Figure 7 of Topic Paper 1 Addendum	Thomas Pilcher
PMSID 0918-1/Mod/TP1Add/1			The creation of a defensible and justifiable green belt boundary to safeguard land and which uses permanent and easily identifiable features such as the ring road.	Robert Pilcher
PMSID 0918-1/Mod/TP1Add/2			Extension of green belt protection well beyond the operative period of the local plan of at least 10-25 years.	Robert Pilcher

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

Policy SS4 (Site ST5)

York Central

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0339/S/SS4(ST5)/1		Not Sound	The site has only just received outline planning permission, has no developers signed up and requires land assembly, sale and preparation prior to homes being released. The Councils ambitions for delivery next year are clearly unrealistic, given the length of time site acquisition and the determination of a planning application will take for a detailed scheme, let alone site preparation and build. The Council need to be realistic about its delivery and assumptions made on the housing trajectory. Simply allocating unreasonable numbers to the site with no evidence will continue to restrict the level of homes in the city and under provide for the needs of its residents. The site should therefore be significantly reduced in terms of the delivery in this plan period, with the homes being pushed into the next plan period. This way sufficient other sites can be allocated to meet the needs in this plan period.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0364/S/SS4(ST5)/1		Not Sound	The programme of sites is heavily dependent on brownfield land and in the case of sites like York Central (ST5) there are severe development constraints or risks associated with all these sites. Planning permission has recently been granted for York Central (ST5) so some progress has been made but many hurdles remain. 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. Sites are 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	York Labour Party (Dave Merrett)
PMSID 0365- 1/S/SS4(ST5)/1		Not Sound	Given the centrality of York station to the northern rail network, given it's connectivity to the wider region and how far more jobs are planned at other stations, York Central should be prioritising business development not residential. The site could deliver long term revenue opportunities over a more sustained period of time, rather than a rapid capital receipt for housing.	Rachael Maskell MP for York Central
PMSID 0886/S/SS4(ST5)/1			The programme of sites is heavily dependent on brownfield land and in the case of sites like York Central (ST5) there are severe development constraints or risks associated with all these sites. Planning permission has recently been granted for York Central (ST5) so some progress has been made but many hurdles remain. 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. Sites are 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 for York Central
PMSID 0886/S/SS4(ST5)/1		Not Sound	The programme of sites is heavily dependent on brownfield land and in the case of sites like York Central (ST5) there are severe development constraints or risks associated with all these sites. Planning permission has recently been granted for York Central (ST5) so some progress has been made but many hurdles remain. 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. Sites are 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	York Labour Group (Dave Merrett)

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

Policy SS4 (Site ST5)

York Central

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Proposed Modification				
PMSID 0339/Mod/SS4(ST5)/1			Assumptions made in the housing trajectory about the deliverability of York Central are so overly-optimistic as to be wrong. Delivery in this plan period should be significantly reduced with some of the homes being delivered in the next plan period.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0365/Mod/SS4(ST5)/1			It is vital that a comprehensive economic audit is undertaken to understand the potential of the site to create inward investment opportunities before further decisions are made. Seems very likely that York Central should prioritise commercial development over residential.	Rachael Maskell MP for York Central

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

Policy SS8 (Site ST4) Land Adjacent to Hull Road				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0913 - 2/LC/SS8(ST4)/1	No		No specific details provided	Sally Hawkswell
Soundness				
PMSID 0125-3/S/SS8(ST4)/1			Support allocation of site ST4 Hull Road as a site for development. Should the two planning applications be approved within the monitoring year 2019/2020 it is anticipated that the site can deliver 35 new homes per annum in the monitoring year 2020/2021 onwards. Resulting in the delivery of 175 homes from the site in the first five years post adoption of the Local Plan and the completion of the site by 2027. Well within the Local Plan period.	Persimmon Homes (Jess Kiely)
PMSID 0881/S/SS8(ST4)/1			New developments should not encroach on the Green Belt as they currently do. Other parishes should shoulder the burden of increased development.	Cordula Van Wyhe
PMSID 0881/S/SS8(ST4)/1		Not Sound	Development of Green Belt will compromise the rural character of the parish including the increase of traffic and pollution	Cordula Van Wyhe
PMSID 0913/S/SS8(ST4)/1			ST4: Land Adj Hull Road - other potential sites have not been explored e.g.. Teardrop site, British Sugar site, Rowntrees & MOD sites (all brownfield). Traffic on the A1079 is already congested even with P&R facilities. Close to and old refuse tip with potential for contamination. Hedgerow with wildlife habitat. Climate change should be considered.	Sally Hawkswell
Proposed Modification				
PMSID 0881/Mod/SS8(ST4)/2			ST4 should be removed from the plan	Cordula Van Wyhe
PMSID 0915/Mod/SS8(ST4)/1			The respondent believes Green Belt land should be protected in perpetuity and fellow Heslington residents have relayed to the respondent that the local plan is a 'disgrace and shameful'. Site ST4 to be removed from the Local Plan	Jeanne Lister

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

Policy SS9 (Site ST7) Land East of Metcalfe Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0585/S/SS9(ST7)/1		Not Sound	Whilst Taylor Wimpey maintain their support for the allocation of ST7 we maintain our objections to the proposed unnecessary separation of Site ST7 from the Main Urban Area, which we consider will make the development less rather than more sustainable.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0594/S/SS9(ST7)/1		Not Sound	Continue to support CYC's identification of the site as a new Garden Village within the emerging City of York Local Plan. However CYC should have taken the opportunity presented through the Proposed Modifications consultation to resolve our concerns with the current red line site allocation boundary. Whilst the site can deliver 845 homes within the plan period within CYC's proposed site allocation boundary, it is our view that the current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS9 of the Publication Draft Local Plan.	PB Planning (Paul Butler) OBO TW Fields
PMSID 0594/S/SS9(ST7)/2		Sound	A key matter that CYC need to consider in respect of the need to expand the site allocation boundary is the requirement to deliver a southern access to Osbaldwick Link Road. Extending the boundary as requested by this and previous representations will ensure that this required access point (as stipulated by Policy SS9) can be delivered.	PB Planning (Paul Butler) OBO TW Fields
Proposed Modification				
PMSID 0001/Mod/SS9(ST7)/1			Increase size of land east of Metcalfe Lane as per original proposal thereby justifying new amenities and direct eco friendly transport links into City.	David Marsh
PMSID 0585/Mod/SS9(ST7)/1			Whilst Taylor Wimpey maintain their support for the allocation of ST7 we maintain our objections to the proposed unnecessary separation of Site ST7 from the Main Urban Area, which we consider will make the development less rather than more sustainable. An alternative boundary has been proposed.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0594/Mod/SS9(ST7)/1			A key matter that CYC need to consider in respect of the need to expand the site allocation boundary is the requirement to deliver a southern access to Osbaldwick Link Road. Extending the boundary as requested by this and previous representations will ensure that this required access point (as stipulated by Policy SS9) can be delivered.	PB Planning (Paul Butler) OBO TW Fields

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

Policy SS9 (Site ST7) Land East of Metcalfe Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0594/Mod/SS9(ST7)/2			Amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters. Three potential development options are presented to the Council - Option 1 - The delivery of 845 homes (including up to 253 affordable homes) at the site alongside each of CYC's proposed "Planning Principles" with additional areas of recreational open space and landscaping.	PB Planning (Paul Butler) OBO TW Fields
PMSID 0594/Mod/SS9(ST7)/3			Amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters. Three potential development options are presented to the Council - Option 2 - The delivery of 975 homes (including up to 292 affordable homes) at the site to meet any potential increase in the City's housing requirements alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site.	PB Planning (Paul Butler) OBO TW Fields
PMSID 0594/Mod/SS9(ST7)/4			Amendments are required to the site's proposed boundaries in order to ensure that CYC's Garden Village philosophy for the site can be delivered alongside each of CYC's identified Planning Parameters. Three potential development options are presented to the Council - Option 3 - The delivery of 1,225 homes (including up to 368 affordable homes) at the site to meet any potential increase in the City's housing requirements alongside a proportionate enhancement to the benefits that the site can deliver in association with CYC's proposed "Planning Principles" for the site.	PB Planning (Paul Butler) OBO TW Fields

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

Policy SS10 (Site ST8) Land North of Monks Cross

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0582/S/SS10(ST8)/1			Support the allocation of ST8, for which planning consent is currently pending consideration (18/00017/OUTM)	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson
PMSID 0582/S/SS10(ST8)/2			Object to the boundary of ST8 which excludes land to the west of the allocated site from the developable area and includes it in Green Belt.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson
PMSID 0583/S/SS10(ST8)/1			Support the allocation of ST8 for circa 970 dwellings, for which planning consent is currently pending consideration (18/00017/OUTM)	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0891/S/SS10(ST8)/1			Support the allocation of ST8, for which planning consent is currently pending consideration (18/00017/OUTM)	Johnson Mowatt (Mark Johnson) OBO Redrow Homes
Proposed Modification				
PMSID 0582/Mod/SS10(ST8)/1			Developer supports an alternative boundary to ST8. To extend the allocation to the west of that which is shown in the submitted Local Plan.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson

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

Policy SS11 (SiteST9)

Land North of Haxby

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0598/S/SS11(ST9)/1	Not Sound	Not Sound	Supports continued allocation of site ST9 Land North of Haxby.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0864/S/SS11(ST9)/1	Not Sound	Not Sound	Development will not be able to sustain the increased pressure on facilities and infrastructure due to a larger population. Without massive improvements to the road network, the development will make the area untenable. Social organisations, including the Church, will not cope. It's understood that the development will not be big enough to attract a new GP practice.	Parochial Church Council St Mary's Haxby (Noreen Bartram)

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

Policy SS12 (Site ST14) Land West of Wigginton Road				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0621/S/SS12(ST14)/1		Sound	Support for the allocation of ST14 as a new Garden Village. Site is located within a suitable and highly sustainable location and there are no technical and environmental (built and natural) constraints that would preclude the development of the site. The site is available now as it is under the control of a national housebuilder and regional development company who are actively seeking to secure planning permission for the residential development of the site. The site can also be considered achievable as it can deliver 420 new homes on the site within the next 5 years. Confirms delivery of 1348 homes within the Plan period. Note Option 1 boundary alteration.	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PMSID 0621/S/SS12(ST14)/2		Not Sound	In order to deliver a truly exemplar new Garden Village, the site allocation should be expanded to at least 72.73ha in total and 1,725 homes (32dph on 53.96ha) - placemaking benefits, CYC Officer reasoning, CYC's increased housing need and potential accelerated delivery.	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PMSID 0864/S/SS12(ST14)/1		Not Sound	Development will not be able to sustain the increased pressure on facilities and infrastructure due to a larger population. Without massive improvements to the road network, the development will make the area untenable. Social organisations, including the Church, will not cope. It's understood that the development will not be big enough to attract a new GP practice.	Parochial Church Council St Mary's Haxby (Noreen Bartram)
Proposed Modification				
PMSID 0364/Mod/SS12(ST14)/1			Sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are ad hoc changes which have been reactively prepared.	York Labour Party (Dave Merrett)
PMSID 0365/Mod/SS12(ST14)/1			Sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are adhoc changes which have been reactively prepared.	Rachael Maskell MP for York Central
PMSID 0621/Mod/SS12(ST14)/1			Alternative site boundary Option 1 - resubmission of previous rep. The delivery of 1,350 homes (including 405 affordable homes) at the site, alongside SS12 policy principles. NB this option reduced the southern gap with the ring road to 0.46km. Note submitted updated Masterplan. This is a copy of rep submitted at Publication stage.	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields

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

Policy SS12 (Site ST14) Land West of Wigginton Road				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0621/Mod/SS12(ST14)/ 2			Alternative site boundary Option 2 - resubmission of previous rep. The delivery of 1,725 homes (including 517 affordable homes) involving expansion to the north. Development to accord with policy SS12, alongside proportionate enhancement. Would help address potential increase in City's housing requirement and/or accelerate delivery. NB, CYC previously consulted on alternative larger development options (up to 4,020 homes at Preferred Options stage), including Sustainability Appraisal of the same. This is a copy of rep submitted at Publication stage.	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PMSID 0621/Mod/SS12(ST14)/ 3			Alternative site boundary Option 3 - resubmission of previous rep. The delivery of up to 2,200 homes (including 660 affordable homes). Development to accord with policy SS12, alongside proportionate enhancement. Would help address potential increase in City's housing requirement and/or accelerate delivery and ensure GB permanence. This is a copy of rep submitted at Publication stage.	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PMSID 0886/Mod/SS12(ST14)/ 1			Sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are adhoc changes which have been reactively prepared.	York Labour Group (Dave Merrett)

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

Policy SS13 (Site ST15)
Land West of Elvington Lane

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0075/LC/SS13(ST15)/1	No		The evidence for preference for a large green belt site with new infrastructure versus several smaller developments closer to existing settlements is not set out in the draft Local Plan. Natural England (Comments 2017) asks on what evidence the CYC has based its decision that wider sustainability reasons outweigh threats to Heslington Tillmire of ST15. It is not clear how this comment has been responded to.	Heslington Parish Council
PMSID 0075/LC/SS13(ST15)/2	No		Has not proved that compensation/mitigation area will protect SSSI Tillmire. No Independent environmental study of the whole green belt area south east of Heslington Village and its relationship to, and impact on, the Tillmire SSSI.	Heslington Parish Council
PMSID 0872/LC/SS13(ST15)/1	Yes		Opposes inclusion of site ST15 because of negative impact on the historical character of Heslington. Also need to retain agricultural land for food sufficiency post-Brexit. Documents are vague on nature of proposed access roads, protection of quiet country lanes and the historical character of Heslington Main Street cannot be guaranteed.	Jeffrey Stern
PMSID 0872/LC/SS13(ST15)/2	Yes		Suggested nature reserve OS10 is laudable but misguided. Proximity to new development with all the attendant noise / air / light pollution will harm wildlife as will all the cats / rats / foxes that will be attracted to the new development.	Jeffrey Stern
PMSID 0887/LC/SS13(ST15)/1	Yes		Compliant with obligations of Duty to Co-operate and to be legally compliant	John Micklethwaite-Howe
PMSID 0902/LC/SS13(ST15)/1	Yes		No comment provided	Jacqui & Christopher Chainey & Cadman
PMSID 0903/LC/SS13(ST15)/1	Yes		The authors have made every effort to comply	Maurice Dodson
PMSID 0906/LC/SS13(ST15)/1	Yes		Compliant as far as respondent is aware	Keith Emmans
PMSID 0907/LC/SS13(ST15)/1	Yes		Respondent believes they are compliant legally and with duty to cooperate	Michael Emmans-Dean

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

Policy SS13 (Site ST15) Land West of Elvington Lane

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0910/LC/SS13(ST15)/1			No specific details provided	Chris Hawkswell
PMSID 0911/LC/SS13(ST15)/1	No		No specific details provided	Matthew Arthey OBO spouse and child

Soundness

PMSID 0052/S/SS13(ST15)/1		Not Sound	Habitats Regs in terms of ST15 should have similar implications to those affecting the removal of Strensall Barracks sites	Pauline Bramley
PMSID 0052/S/SS13(ST15)/2		Not Sound	PM 24/26,10 ST15, OS10 Strensall barracks primarily removed for effects from additional footfall on an SSSI. ST15 is far greater house numbers, a town, where Grade 2 farmed gives support to the Tilmire SSSI. The footfall will be far greater, light , domestic pet , fume, noise, drainage pollution, will cause irrevocable damage to the flora and fauna. PM26 .YCC have not proved compensatory/ mitigation measures will protect the SSSI No Independent environmental study appears to have been done. PM24 new development should not cause noise disturbance and loss of amenity for nearby residents PM24 new development should not cause noise disturbance and loss of amenity for nearby residents Largest housing site in Plan taking Green Belt land. Because of the SSSI additional farmed land OS10 taken .All 10 local farming families will be affected. Further farmed land will be required for infrastructure. A Local Plan should be right for the Community Houses numbers reduced. Smaller development would need less OS10 If proven to be the right site, should be more towards Elvington Rd and have a buffer zone all round. Airfield already concreted. Housing numbers have been reduced each year so why has ST15 in the green belt not been reduced. If reduced the concreted airfield part of site should be used	Pauline Bramley

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0075/S/SS13(ST15)/1		Not Sound	It has not been proved that a compensation/mitigation area will protect SSSI Tillmire. Natural England advocates provision of environmental compensation 5 years before development starts. How will this be enacted? What independent environmental assessment of the whole area will the compensation be based on? Any increase in public access of any kind from ST15 onto Langwith Stray/Long Lane and Common Lane will cause irreversible damage. Turning the lanes into pedestrian/cycleways will be detrimental for the SSSI Tillmire. The increase usage of the cycle ways/ footpaths will massively increase the footfall across the Tillmire. There is already a problem, throughout the year, with cyclists/ walkers straying off the tracks; dog walkers continue to cause problems especially with gazing stock and ground nesting birds. Taking traffic and pedestrians away from the Tillmire SSSI and should be give highest priority in decision making. What monitoring has been done of current recreational visits to the Tillmire and how will any increase in numbers be audited? The precise status of OS10 remains unclear. OS10 will be a new re-wilded wetland habitat buffer to mitigate for the impact of recreational visitors from ST15 on Lower Derwent bird populations 7km distant. But TP1 Addendum Section 7, P72, Para 7.95 advocates "significantly enhanced public access to high quality open spaces....enhanced access to green belt beyond site boundaries." There is currently open access to Heslington Tillmire and a long distance footpath, Minster Way, runs through it. These contradictions need to be addressed and clarified.	Heslington Parish Council
PMSID 0075/S/SS13(ST15)/2		Not Sound	What environmental assessments have been carried out for ST15 and environs, and by whom and when? Habitats Regulations Assessment Feb 2019, p31, para 3.22 - indicates the landlords undertook their own ecological reports. There are populations of bats, brown hare, owls (barn, tawny and little) and numerous resident and migratory birds including lapwing, curlew, egrets across the area in addition to those of the SSSI and the SINC sites. There is very limited reference to the wildlife of this area compared with that of Strensall and Lower Derwent. An up to date independent and correctly represented environmental assessment of ST15 sites and a significant extent of the rural area around them is required before the permanent loss of green belt and agricultural land and wild life habitation is sanctioned.	Heslington Parish Council
PMSID 0075/S/SS13(ST15)/3		Not Sound	The yearly housing need forecast has been reduced from 867 to 790. Why has this site in the Green Belt and close to environmentally sensitive areas not been reduced ?	Heslington Parish Council
PMSID 0075/S/SS13(ST15)/4		Not Sound	Access for existing residents and businesses to Heslington village and York from lanes South East of Heslington Village is unresolved. The proposal suggesting that Langwith Stray/Long Lane and Common Lane could become a combined pedestrian /cycle track from the development as well as accommodating the existing local traffic, large, wide farm vehicles and associated commercial vehicles connected to houses and business in those locations (fishing lakes, liveries, farming, animal movement) would be unworkable and unsafe.	Heslington Parish Council
PMSID 0075/S/SS13(ST15)/5			Heslington is in danger of losing its identity. A Local Plan should be right for the community. Queried what evidence there is from other similar developments that ST15 will provide the type of housing needed for York residents and that this will not be adormitory town for other conurbations?	Heslington Parish Council

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0222/S/SS13(ST15)/1		Sound	Respondent supports proposal for one large development, rather detracting from existing villages through disproportionate and unsustainable development.	Joanne Wedgwood
PMSID 0222/S/SS13(ST15)/2		Not Sound	Respondent does not support location of development. Concerned about the 'undermining' of the airfield's history, the Air Museum's inherent character and that cessation of other activities that use the current airfield by the illogical building in the middle of the airstrip.	Joanne Wedgwood
PMSID 0222/S/SS13(ST15)/3		Not Sound	Siting of new development so far from A64 not logical. Being nearer to the A64 would provide a shorter route to the A64. The A64 would provide clear separation between the new development and Heslington, so there is no need for ST15 to be so close to Elvington and Wheldrake. Being disproportionate in size to the villages the development would dominate the area.	Joanne Wedgwood
PMSID 0222/S/SS13(ST15)/4		Not Sound	Underground fuel pipelines present site contamination issues that would be extremely costly to address but can be avoided by moving the development to the original site.	Joanne Wedgwood
PMSID 0227/S/SS13(ST15)/1		Sound	Respondent supports proposal for one large development, rather detracting from existing villages through disproportionate and unsustainable development.	Matthew Wedgwood
PMSID 0227/S/SS13(ST15)/2		Not Sound	Respondent does not support location of development. Concerned about the 'undermining' of the airfield's history, the Air Museum's inherent character and that cessation of other activities that use the current airfield by the illogical building in the middle of the airstrip.	Matthew Wedgwood
PMSID 0227/S/SS13(ST15)/3		Not Sound	Siting of new development so far from A64 not logical. Being nearer to the A64 would provide a shorter route to the A64. The A64 would provide clear separation between the new development and Heslington, so there is no need for ST15 to be so close to Elvington and Wheldrake. Being disproportionate in size to the villages the development would dominate the area.	Matthew Wedgwood
PMSID 0227/S/SS13(ST15)/4		Not Sound	Underground fuel pipelines present site contamination issues that would be extremely costly to address but can be avoided by moving the development to the original site.	Matthew Wedgwood
PMSID 0364/S/SS13(ST15)/1			Several medium size cities elsewhere in the UK have produced detailed strategies/plans to integrate the development of brownfield and greenfield developments into a coherent whole. These strategies have been driven not just by housing need but by the need to meet sustainability targets and goals. None of the changes here represent this and there has been no work carried out by the Council to explore the options for future development. Specifically the Council has not evaluated the impact of its brownfield policies nor evaluated the potential to create a small number of truly sustainable "green villages". Renaming the land to the West of Elvington lane a Green Village is tokenism of the worst kind.	York Labour Party (Dave Merrett)

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0365/S/SS13(ST15)/1			Several medium size cities elsewhere in the UK have produced detailed strategies/plans to integrate the development of brownfield and greenfield developments into a coherent whole. These strategies have been driven not just by housing need but by the need to meet sustainability targets and goals. None of the changes here represent this and there has been no work carried out by the Council to explore the options for future development. Specifically the Council has not evaluated the impact of its brownfield policies nor evaluated the potential to create a small number of truly sustainable "green villages". Renaming the land to the West of Elvington lane a Green Village is tokenism of the worst kind.	Rachael Maskell MP for York Central
PMSID 0378/S/SS13(ST15)/1		Not Sound	The boundary for ST15 is unsound; it does not meet, in conjunction with other allocations, the true objectively assessed development needs. 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 - the HRA (2019) is considers OS10 is promoted as both an area for informal recreation and as compensation habitat for the biodiversity loss to the footprint of ST15, which are incompatible objectives. Further, it acknowledges that there is a risk that 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. The access road would also traverse OS10. The policy framework therefore leaves open the opportunity for failure to deliver biodiversity outcomes and is deficient in detail, which could undermine the conservation objectives for both the SPA and SSSI. The delivery trajectory is unrealistic - earliest homes could be delivered by 2022/23 and average annual delivery rate is overly ambitious.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0420- 2/S/SS13(ST15)/1		Not Sound	The new siting of ST15 away from the A64 and instead across Elvington Runway is ludicrous. The previous siting is far more logical. Despite CYCs insistence that it harms the perception of York being surrounded by a rural hinterland.	Jane Moorhouse
PMSID 0603/S/SS13(ST15)/1			ST15 may not be suitable for Green Belt release as smaller sites, including The Retreat, may be more suitable for Green Belt release.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0850/S/SS13(ST15)/1		Sound	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.	Highways England (Simon Jones)
PMSID 0872/S/SS13(ST15)/1		Not Sound	Opposes inclusion of site ST15 because of negative impact on the historical character of Heslington. Also need to retain agricultural land for food sufficiency post-Brexit. Documents are vague on nature of proposed access roads, protection of quiet country lanes and the historical character of Heslington Main Street cannot be guaranteed.	Jeffrey Stern
PMSID 0872/S/SS13(ST15)/2		Not Sound	Suggested nature reserve OS10 is laudable but misguided. Proximity to new development with all the attendant noise / air / light pollution will harm wildlife as will all the cats / rats / foxes that will be attracted to the new development.	Jeffrey Stern

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0874/S/SS13(ST15)/1		Not Sound	Character of the village will be radically changed by the proposed development and does not have the infrastructure to cope.	Bryan Boulter
PMSID 0876-3/S/SS13(ST15)/1		Not Sound	ST15 as proposed is not effective for commuting to York. Better locations such as closer to Grimston bar would be more effective with more amenities closer to hand particularly close to existing bus routes.	Joanne Kinder
PMSID 0881/S/SS13(ST15)/1		Not Sound	How will the parish, its country lanes and the historical character of Heslington Main Street be protected from the increase in traffic and pollution?	Cordula Van Wyhe
PMSID 0881/S/SS13(ST15)/2		Not Sound	Development will affect the planned (OS10) nature reserve, through the increase of rats, foxes and cats. Additionally light pollution generated by human settlement will be detrimental to the wildlife	Cordula Van Wyhe
PMSID 0886/S/SS13(ST15)/1			Several medium size cities elsewhere in the UK have produced detailed strategies/plans to integrate the development of brownfield and greenfield developments into a coherent whole. These strategies have been driven not just by housing need but by the need to meet sustainability targets and goals. None of the changes here represent this and there has been no work carried out by the Council to explore the options for future development. Specifically the Council has not evaluated the impact of its brownfield policies nor evaluated the potential to create a small number of truly sustainable "green villages". Renaming the land to the West of Elvington lane a Green Village is tokenism of the worst kind.	York Labour Group (Dave Merrett)
PMSID 0887/S/SS13(ST15)/1		Not Sound	The loss of agriculture land and natural features/character by providing new connections with the A64 is underestimated. The unsustainability of access to ST15, along with the fact that most employment is to the City's north or Leeds, (possibly making ST15 a dormitory for Leeds commuters) prevents a justification to use ST15 as a means to prevent harm of the unrestricted sprawl of Elvington.	John Micklethwaite-Howe
PMSID 0896/S/SS13(ST15)/1			Object strongly to the Local Plan site for a new village of 3300 homes (ST15) - green belt land should not be used for this purpose and extra inhabitants and cars would put unprecedented strain on the infrastructure of the city. The Local Plan should be stopped now it is poorly thought out and detrimental to the city.	Wendy Brierley
PMSID 0899/S/SS13(ST15)/1		Not Sound	Object to the proposed development of ST15 for 3300 homes and have concerns about the impact this would have on the city in terms of sustainability and the affect on the environment - particularly in respect of green belt land that plays a crucial role in bio-diversity.	Holly Steel

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0902/S/SS13(ST15)/1		Not Sound	Respondent asks why, seeing that the numbers of dwellings has been reduced that ST15 has not been reduced in size?	Jacqui & Christopher Chainey & Cadman
PMSID 0902/S/SS13(ST15)/2			If ST15 is utilised as intended there are concerns that the mitigation buffer of OS10 will result in considerable detriment to the neighbouring SSSI (The Tilmire). Both the environment and wildlife will suffer due to an increase in domestic animals	Jacqui & Christopher Chainey & Cadman
PMSID 0902/S/SS13(ST15)/3			If Long Lane is used as access to ST15 upgrading of this narrow road will cause considerable harm to Heslington village and its occupants	Jacqui & Christopher Chainey & Cadman
PMSID 0902/S/SS13(ST15)/4			Prime productive land when Britain needs to produce its own, will be lost to building and access roads. Respondent would like to see the development moved further away from Heslington village and more towards Elvington Airfield. Doing so would use more brown field site rather than taking productive agricultural land.	Jacqui & Christopher Chainey & Cadman
PMSID 0903/S/SS13(ST15)/1		Not Sound	Removal of barracks and subsequent loss of housing increases the number of houses in other developments, such as ST15 which lies in a brown field area.	Maurice Dodson
PMSID 0904/S/SS13(ST15)/1		Not Sound	An independent environmental assessment is required to assess the impact of ST15 on the nearby Tillmire SSSI. The Sustainability Addendum states the development will have 'uncertain affects on the Tillmire' and the habitats Assessment states that 'significant effects cannot be ruled out'. The scale of development is too big and uses too much agricultural land.	Anneliese Emmans Dean
PMSID 0906/S/SS13(ST15)/1		Not Sound	ST15 should not cause noise and loss of amenity for nearby residents	Keith Emmans
PMSID 0906/S/SS13(ST15)/2		Not Sound	ST15 will have an adverse effect on the Tilmire, which is an SSSI. CYC has not provided sufficient proof that OS10 mitigation will protect the Tilmire SSSI from the large development of ST15	Keith Emmans
PMSID 0907/S/SS13(ST15)/1		Not Sound	ST15 should not cause noise and loss of amenity for nearby residents. The proposed development is too large and encroaches too much onto agricultural land.	Michael Emmans- Dean
PMSID 0907/S/SS13(ST15)/2		Not Sound	ST15 will have an adverse effect on the Tilmire, which is an SSSI. CYC has not provided sufficient proof that OS10 mitigation will protect the Tilmire SSSI from the large development of ST15	Michael Emmans- Dean

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0910-2/S/SS13(ST15)/1		Not Sound	Nature conservation area as mitigation is means of Council balancing guilt for the removal of 1000 acres of agricultural land and buying support for an unwanted and unnecessary development.	Chris Hawkswell
PMSID 0910/S/SS13(ST15)/1		Not Sound	Agricultural land will be lost by building ST15. Traffic will be a major issue and there will be loss of wildlife habitat. Increased housing throughout York means number of dwellings for ST15 should be lower	Chris Hawkswell
PMSID 0911/S/SS13(ST15)/1		Not Sound	ST15 settlement is too large at 3000 homes - it will adversely affect the neighbourhood of Elvington and Heslington. A link road with the A64 will increase traffic through Heslington.	Matthew Arthey OBO spouse and child
PMSID 0912/S/SS13(ST15)/1		Not Sound	Agricultural land should not be destroyed where avoidable, because with rising global population and climate change fertile agricultural land should be protected to guarantee production of adequate food. Using large areas of agricultural land, such as the land proposed for ST15 and conservation area OS10, is highly irresponsible in these uncertain time of food insecurity.	Stephen Hawkswell
PMSID 0912/S/SS13(ST15)/2		Not Sound	Brown field sites should always be given first priority when building new houses for the housing shortage. Furthermore ST15 will place strain on surrounding villages, increasing traffic flow will clog up already busy roads, causing delays and creating a great deal of stress on people's lives and their relationships at home and at work.. For this reason the planned development of ST15 is highly irresponsible	Stephen Hawkswell
PMSID 0912/S/SS13(ST15)/3		Not Sound	The plan is not justified as there are more appropriate strategies that would avoid the wastage of good agricultural land by promoting the development of unused brown field sites. The practice of taking land out of agricultural production is unsustainable as over time if building were to continue there would be nothing left to eat.	Stephen Hawkswell
PMSID 0913/S/SS13(ST15)/1		Not Sound	ST15 Garden Villages were rejected as unsustainable by a previous government. This is supposedly a brownfield development however airfields have been proven to be a wildlife rich habitat. The only brownfield parts of the site are hangars and runway. Access on to the A64 would be hazardous and would also add to climate change. This is too large for development out of town without public transport. Water supplies need consideration together with sewerage requirements. It is not sound as not sustainable.	Sally Hawkswell

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

Policy SS13 (Site ST15) Land West of Elvington Lane

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0915/S/SS13(ST15)/1		Not Sound	Respondent concerned about the loss of valuable agricultural land, the livelihood and farming knowledge of its occupants. The destruction of wildlife habitat and eco systems will impact upon an invaluable resource for the whole community such as food security and the personal well being residents derive from their connection with the countryside. The respondent acknowledges there is a demand for housing, but that perhaps CYC has overestimated the requirement. In the current situation of 'climate emergency' building an unsustainable 'garden village' without public transportation would cause further detriment to traffic congestion and air pollution. The respondent believes Green Belt land should be protected in perpetuity and fellow Heslington residents have relayed to the respondent that the local plan is a 'disgrace and shameful'. The respondent hopes that by working together that wise use of existing sites in York could circumvent the impact the development would have upon the conservation area and village of Heslington.	Jeanne Lister
Proposed Modification				
PMSID 0052/Mod/SS13(ST15)/1			Remove ST15/OS10 from Plan - Proof is require that ST15 is the correct location for the largest green belt housing development that uses productive agricultural land and close to a SSSI - CYC have not proved that compensation/mitigation area will protect the SSSI. Evidence of an independent study required. Further land needed for infrastructure.	Pauline Bramley
PMSID 0073/Mod/SS13(ST15)/1			Support ST15 as an allocation however feel that better advantage should be taken of opportunity to site travelling show people (TSP) on site and should be an alternative to SP1: The Stables Elvington	Peter Heptinstall
PMSID 0075/Mod/SS13(ST15)/1			ST15 should 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. The Local Plan (ST15+OS10) is too large and takes too much productive Grade 2 agricultural land which comprises at least 400 Ha green belt. Access via the existing road to Elvington Lane will leave current Heslington residents' access to their village intact as well as protecting the SSSI and conserving arable land and associated businesses. The SSSI would be undisturbed.	Heslington Parish Council
PMSID 0102/Mod/SS13(ST15)/1			ST15 is too close to the villages of Elvington and Wheldrake as well as being disproportionate in size to them. It would dominate the area, when it could and should be sited further away. Concerns with the lack of information provided on the impact on the local area of new infrastructure generally – and particularly the transport links to the A64 and B1228. The effect on the surrounding countryside, and the villages of Elvington and Wheldrake, will be vast. Economically ill-advised to destroy the airfield runway in the way proposed. It is an important part of York's history and the full-length runway should be retained for historical reasons and future strategic need, along with the existing recreational activities that currently take place. The adverse impact on the internationally respected Yorkshire Air Museum and Allied Air Forces Memorial would further damage tourism and the reputation of York itself. Cannot support the proposal, but would support ST15 if it was on the originally proposed site alongside the A64 and adjacent to the proposed new junction.	Elvington Parish Council (David Headlam)

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

Policy SS13 (Site ST15)				
Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0222/Mod/SS13(ST15)/ 1		Not Sound	Respondent believes it's critical that the location for thousands of homes be correct. Original location of Whinthorpe, closer to Grimston Bar is better. A64 would separate new development from Heslington and could be screened.	Joanne Wedgwood
PMSID 0222/Mod/SS13(ST15)/ 3			With the moving of the development closer to Grimston Bar and the A64, the airstrip would be maintained, there'd be a significant reduction in commuter miles and pollution, with the nearness making it more likely that people would cycle or use public transport. Additionally, there would be less construction traffic pollution.	Joanne Wedgwood
PMSID 0227/Mod/SS13(ST15)/ 1		Not Sound	Respondent believes it's critical that the location for thousands of homes be correct. Original location of Whinthorpe, closer to Grimston Bar is better. A64 would separate new development from Heslington and could be screened.	Matthew Wedgwood
PMSID 0227/Mod/SS13(ST15)/ 3			With the moving of the development closer to Grimston Bar and the A64, the airstrip would be maintained, there'd be a significant reduction in commuter mile and pollution, with the nearness making it more likely that people would cycle or use public transport. Additionally, there would be less construction traffic pollution.	Matthew Wedgwood
PMSID 0364/Mod/SS13(ST15)/ 1			Sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are adhoc changes which have been reactively prepared.	York Labour Party (Dave Merrett)
PMSID 0365/Mod/SS13(ST15)/ 1			Sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are ad hoc changes which have been reactively prepared.	Rachael Maskell MP for York Central

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0378/Mod/SS13(ST15)/ 1			Alternative site proposed in the vicinity of ST15, a sustainable Garden Village consistent with the spatial approach adopted in the draft Local Plan. In contrast to ST15, it is proven that Langwith will have no unacceptable biodiversity impact on the Lower Derwent Valley SPA nor the Heslington Tillmire SSSI - 400m buffer between Langwith and the closest part of the Heslington Tillmire SSSI; footpath mechanism to screen people into the HEA; detailed visitor access management plan; habitat management regime; all nature conservations to be created and managed under a long-term framework are buffered from the import of impacts. Langwith has the prospect of delivering at a much quicker pace; immediate access to Elvington Lane would allow the early delivery of houses and opening up a second access from the A64 would provide additional sales outlets - likely delivery rate of 300 dpa with 2 alternate access points. This would allow 2,275 units in the Plan period with the remainder delivered by 2038/39. It is considered that enabling viable and deliverable access at the the start of the settlement's development will ensure the scheme has good proespects of delivery.Langwith would also deliver a range of benefits and services required for the new population and public transport infrastructure.Comparative to ST15, it will increase the brownfield land take (more than twice that of ST15) and deliver a net gain in greenfield land. NB: Sustainability Appraisal, GB assessment of Langwith and delivery trajectory submitted with rep.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0420- 2/Mod/SS13(ST15)/1			Re-site ST15 away from the runway and closer to the A64	Jane Moorhouse
PMSID 0863/Mod/SS13(ST15)/ 1			There is a once in a lifetime chance to build a whole new self contained development with all necessary infrastructure schools, doctors retail and public transport on ST15. This may need the capacity to be increased to 5000 homes, however, this would then remove the need to over develop the adjoining close villages. (e.g.. ST33: Station Yard Wheldrake.	R F Arnold
PMSID 0872/Mod/SS13(ST15)/ 1			Remove site SS13/ST15 Land West of Elvington Lane from the plan.	Jeffrey Stern
PMSID 0876- 1/Mod/SS13(ST15)/1			CYC should provide traffic pollution statistics when proposing to build 3329houses that would result in a large increase in car use and also take account of other developments (H39) proposed for Elvington. Removal of the green belt would be an adverse decision and seriously impact on the residents.	Joanne Kinder
PMSID 0881/Mod/SS13(ST15)/ 1			ST15 should be accommodated by Elvington Parish where access roads already exist.	Cordula Van Wyhe

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

Policy SS13 (Site ST15) Land West of Elvington Lane				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0881/Mod/SS13(ST15)/ 2			ST15 should be removed from the plan	Cordula Van Wyhe
PMSID 0886/Mod/SS13(ST15)/ 1			Sites ST15 and ST14 should be expanded as part of a bold plan to create a small number of sustainable green village developments to meet both quantity and quality of provision. These are ad hoc changes which have been reactively prepared.	York Labour Group (Dave Merrett)
PMSID 0887/Mod/SS13(ST15)/ 1			Delete ST15 or consider limited expansion of Elvington to the NE of the B1228 whilst providing access to the village infrastructure and local school.	John Micklethwaite- Howe
PMSID 0902/Mod/SS13(ST15)/ 1			Move ST15 further away from Heslington and towards Elvington Airfield using more of the brown field site	Jacqui & Christopher Chainey & Cadman
PMSID 0903/Mod/SS13(ST15)/ 1			ST15 should incorporate more or all of the Elvington Airfield brown field site.	Maurice Dodson
PMSID 0911/Mod/SS13(ST15)/ 1			ST15 - proposals for the settlement should be far smaller so that it does not dwarf the surrounding villages and generate more traffic through them.	Matthew Arthey OBO spouse and child

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

Policy SS14 (Site ST16)

Terry's Extension Sites

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0394/S/SS14(ST16)/1		Sound	McCarthy and Stone support the identification of Terry's Car Park site as a proposed housing allocation. Should a planning application be approved within the monitoring year 2020/2021 it is anticipated that the development of the site will be completed in the monitoring year 2022/23, resulting in the delivery of 72 residential care units from the site in the first 5 years post adoption of the Local Plan. The site is available now and can be considered achievable as new homes can be delivered on the site within the next 5 years.	PB Planning (Paul Butler) OBO McCarthy & Stone
Proposed Modification				
PMSID 0394/Mod/SS14(ST16)/1			The specific policy wording should 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.	PB Planning (Paul Butler) OBO McCarthy & Stone
PMSID 0856/Mod/SS14(ST16)/1			Terry's site and provision of medical services. Respondent would like to have Phase 2 Terry's Car Park ST16/SS14 used to provide medical facilities.	John Young

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

Policy SS16 (Site ST31)
Land at Tadcaster Road, Copmanthorpe

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0053/S/SS16(ST31)/1		Sound	Supports the principle of development in this location in line with allocation set out in the Copmanthorpe Neighbourhood Plan	Peter Whitfield
PMSID 0372/S/SS16(ST31)/1		Sound	Respondent confirms the site's planned delivery rate, its availability and deliverability. Further, the site would contribute to the Council's 5 year housing land supply.	Gladman Developments (Craig Barnes) OBO Gladman Developments
Proposed Modification				
PMSID 0053/Mod/SS16(ST31)/ 1			In light of population projections since 2018 Local Plan respondent suggests that density numbers in ST31 can be reduced from 158 to 75, reflecting average housing density across Copmanthorpe, as identified by the Copmanthorpe Neighbourhood Plan and to be in character with the local area.	Peter Whitfield
PMSID 0171/Mod/SS16(ST31)/ 1			In light of population projections since 2018 Local Plan respondent suggests that density numbers in ST31 can be reduced from 158 to 75, reflecting average housing density across Copmanthorpe, as identified by the Copmanthorpe Neighbourhood Plan and to be in character with the local area.	Megan Taylor
PMSID 0291/Mod/SS16(ST31)/ 1			The reduced OAHN offers scope for reducing development at ST31. The densities should be reduced to those set out in the Copmanthorpe Neighbourhood Plan.	Derek Brown
PMSID 0301/Mod/SS16(ST31)/ 1			In light of downward revisions to the OAN the opportunity should be taken to reduce the suggested number of dwellings on site ST31. This site is identified in the Copmanthorpe Neighbourhood Plan with an estimated yield of 75 dwellings reflecting the average housing density across Copmanthorpe. Local Plan Policy H2 is an indicative guide only and acknowledges that density should be informed by the character of the local area.	Copmanthorpe Parish Council (Robert West)
PMSID 0651/Mod/SS16(ST31)/ 1			In light of downward revisions to the OAN the opportunity should be taken to reduce the suggested number of dwellings on site ST31. This site is identified in the Copmanthorpe Neighbourhood Plan with an estimated yield of 75 dwellings reflecting the average housing density across Copmanthorpe. Local Plan Policy H2 is an indicative guide only and acknowledges that density should be informed by the character of the local area.	David Carr

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

Policy SS18 (Site ST33) Station Yard, Wheldrake

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0034/S/SS18(ST33)/1		Not Sound	Modification in relation to Station Yard does not address issues in submission by Wheldrake Parish Council and others. Additionally ST13 is not compatible with Council's adoption of climate change policy.	David Randon
PMSID 0342/S/SS18(ST33)/1			Object to removal of ST33 from the Green Belt. ST33 when submitted as 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 . Purposes 1, 3 & 4 for Green Belt have been ignored/incorrect for ST33. 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. In the case of ST33 the educational exceptional circumstances only arise if development proceeds and then becomes requirement.	Andy Bell
PMSID 0342/S/SS18(ST33)/2		Not Sound	In some instances 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.	Andy Bell
PMSID 0909/S/SS18(ST33)/1		Not Sound	Object to removal of ST33 from the Green Belt. ST33 when submitted as 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 . Purposes 1, 3 & 4 for Green Belt have been ignored/incorrect for ST33. 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. In the case of ST33 the educational exceptional circumstances only arise if development proceeds and then becomes requirement.	Sophie Bell
PMSID 0909/S/SS18(ST33)/2			In some instances 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.	Sophie Bell

Proposed Modification

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

Policy SS18 (Site ST33)
Station Yard, Wheldrake

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0863/Mod/SS18(ST33)/ 1			Respondent wants ST33 removing - Stating the proposal for ST33: Station Yard Whledrake is totally out of keeping with a relatively small village and any development should be restricted to the area contained within the Bromfield part of the site. There are numerous proposals for sites close to Wheldrake and the road system is not capable of withstanding the increase in traffic. Development of ST33 would result in incursion into the green belt and loss of agricultural land. The priority should be to develop housing on brownfield land.	R F Arnold

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

Policy SS20 (Site ST36) Imphal Barracks, Fulford Road

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0345/S/SS20(ST36)/2			There is an error in the way in which the inner Green Belt boundary is defined in the vicinity of Imphal Barracks. A proper assessment of the land to the immediate east confirms that: 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; 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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0364/S/SS20(ST36)/1			We advocated caution around ST36 Imphal barracks in our comments in 2018 because of uncertainty; these have been ignored but (together with the removal of ST35 - Strensall Barracks) creates a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments.	York Labour Party (Dave Merrett)
PMSID 0365/S/SS20(ST36)/1			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. However we also advocated caution around ST36 Imphal barracks because of uncertainty; this has been ignored. Together these two sites create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments.	Rachael Maskell MP for York Central
PMSID 0886/S/SS20(ST36)/1			We support the removal of ST35 Strensall Barracks from the Plan which we advocated in 2018. However we also advocated caution around ST36 Imphal barracks because of uncertainty; this has been ignored. Together these two sites create a 1200 home hole in the possible future provision which is so badly needed as shown in our previous comments.	York Labour Group (Dave Merrett)
Proposed Modification				
PMSID 0345/Mod/SS20(ST36)/ 3			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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)

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

Policy SS21 (Site ST26) Land South of Airfield Business Park, Elvington

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0102/S/SS21(ST26)/1			Supports ST26 as proposed but emphasises 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.	Elvington Parish Council (David Headlam)
PMSID 0222/S/SS21(ST26)/1		Sound	Respondent supports this development on the basis of additional jobs for local people.	Joanne Wedgwood
PMSID 0227/S/SS21(ST26)/1		Sound	Respondent supports this development on the basis of additional jobs for local people.	Matthew Wedgwood
Proposed Modification				
PMSID 0222/Mod/SS21(ST26)/ 1			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.	Joanne Wedgwood
PMSID 0227/Mod/SS21(ST26)/ 1			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.	Matthew Wedgwood

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

Policy SS22 (Site ST27) University of York Expansion				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0075/LC/SS22(ST27)/1	No		Planned further expansion is 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.	Heslington Parish Council
PMSID 0075/LC/SS22(ST27)/2			There is a contradiction between the stated preference for a garden settlement away from existing settlements (ST15) to avoid developmental spread alongside the A64 and the proposal for ST27.	Heslington Parish Council
PMSID 0902/LC/SS22(ST27)/1	Yes		No comment provided	Jacqui & Christopher Chainey & Cadman
Soundness				
PMSID 0052/S/SS22(ST27)/1		Not Sound	Not proven why University need additional Green Belt land – acres of undeveloped land. Down as employment site so not necessarily educationally required Breaks the buffer principle of protecting Heslington inner village – Secretary of State – enquiry into Heslington East	Pauline Bramley
PMSID 0075/S/SS22(ST27)/1		Not Sound	What is the evidence the University needs additional capacity for an employment or accommodation site? How well is the existing Science Park and Heslington East campus fulfilling this remit? It is unclear why expansion of York University into green belt land and adjacent to the A64 is acceptable, whereas development of affordable housing adjacent to an existing settlement (Heslington) is not. Noted that Historic England advocate University expansion at ST4 not ST27, with ST27 remaining as green belt.	Heslington Parish Council
PMSID 0075/S/SS22(ST27)/2		Not Sound	What environmental assessments have been carried out for ST27 and environs, and by whom and when? Habitats Regulations Assessment Feb 2019 p31 3.22 indicates the landlords undertook their own ecological reports. There are populations of bats, brown hare, owls (barn, tawny and little) and numerous resident and migratory birds including lapwing, curlew, egrets across the area in addition to those of the SSSI and the SINC sites. There is very limited reference to the wildlife of this area compared with that of Strensall and Lower Derwent. An up to date independent and correctly represented environmental assessment of ST27 sites and a significant extent of the rural area around them is required before the permanent loss of green belt and agricultural land and wild life habitation is sanctioned.	Heslington Parish Council

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

Policy SS22 (Site ST27) University of York Expansion				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0849/S/SS22(ST27)/1		Not Sound	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 has been fully addressed in our 2018 Representations with the conclusion that no other site is feasible for the operation of the University.	Oneill Associates (Janet O'Neill) OBO University of York
PMSID 0865/S/SS22(ST27)/1		Not Sound	ST27 is not justified and has no evidence of need	Catherine Blacketer
PMSID 0881/S/SS22(ST27)/1		Not Sound	Development of Green Belt will compromise the rural character of the parish including the increase of traffic and pollution	Cordula Van Wyhe
PMSID 0892/S/SS22(ST27)/1		Not Sound	York has ample reserves of land that are more appropriate for development. Any encroachment of the green belt is to be regretted. An undesirable consequence of development could be increased traffic in the area.	Josephine Tomlin
PMSID 0893/S/SS22(ST27)/1		Not Sound	Do not think that the University should be allowed to expand into the green belt buffer zone between Heslington Village and Low Lane. The University already exceeds its brief with the original Science Park with many buildings either empty or not used for scientific purposes.	Heather Harris
PMSID 0902/S/SS22(ST27)/1		Not Sound	Respondent understands that the Secretary of State approved the Heslington East campus on the basis that the lake bordering on the east campus would be the boundary. This was to protect to protect Heslington village from creeping encroachment by the University of York.	Jacqui & Christopher Chainey & Cadman
PMSID 0902/S/SS22(ST27)/2		Not Sound	A science park already exists on campus but this space is being used by other departments. These departments should be accommodated in under utilised space on Heslington East campus allowing the original science park to be used for its intended function and obviating the need to expand.	Jacqui & Christopher Chainey & Cadman
PMSID 0902/S/SS22(ST27)/3		Not Sound	Low Lane may be used by occupants of ST27, but it's narrow and not suitable for traffic. Upgrading this road will cause considerable harm to Heslington village, its occupants in addition to the environment and wildlife of the area.	Jacqui & Christopher Chainey & Cadman
PMSID 0902/S/SS22(ST27)/4		Not Sound	The continuous unabated development of the University of York is a step too far towards the continuing urbanisation of Heslington village and loss of prime agricultural land at a time when Britain needs to produce more on its own food..	Jacqui & Christopher Chainey & Cadman

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

Policy SS22 (Site ST27) University of York Expansion				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0904/S/SS22(ST27)/1		Not Sound	We have previously been assured that there would be permanent buffer between Heslington East site and A64 bypass. The proposed ST27 Science park goes against this and destroys the buffer we had been assured of.	Anneliese Emmans Dean
PMSID 0907/S/SS22(ST27)/1		Not Sound	The proposed university expansion should not be permitted as it was decreed that a green belt buffer would be maintained between Heslington East development and the A64.	Michael Emmans-Dean
PMSID 0910-3/S/SS22(ST27)/1		Not Sound	Green Belt land which are vital for air quality have been given up by an institution that should be leading by example. Getting land released for educational purposes and then selling it to private institutions should not be done.	Chris Hawkswell
PMSID 0910-3/S/SS22(ST27)/2		Not Sound	The University of York should be using modern teaching techniques which do not need large structures thereby making it less expensive for students	Chris Hawkswell
PMSID 0913/S/SS22(ST27)/1		Not Sound	ST27 is totally unsustainable traffic reliant with no public transport. Development would result in the removal of good quality agricultural land . Brownfield sites should be developed first rather than use the easiest option. With so much development within the local area means this large development is no longer necessary. Climate change is a greater threat. York University should be leading by example and not taking land out of the green belt then selling off properties to private businesses.	Sally Hawkswell
PMSID 0915/S/SS22(ST27)/1		Not Sound	Respondent concerned about the loss of valuable agricultural land, the livelihood and farming knowledge of its occupants. The destruction of wildlife habitat and eco systems will impact upon an invaluable resource for the whole community such as food security and the personal well being residents derive from their connection with the countryside. The respondent notes that the University of York has used their educational status to aid previous efforts to exclude land from the Green Belt, only to develop the land and then sell it off. The respondent acknowledges there is a demand for housing, but that perhaps CYC has overestimated the requirement. In the current situation of 'climate emergency' building an unsustainable 'garden village' without public transportation would cause further detriment to traffic congestion and air pollution. The respondent believes Green Belt land should be protected in perpetuity and fellow Heslington residents have relayed to the respondent that the local plan is a 'disgrace and shameful'. The respondent hopes that by working together that wise use of existing sites in York could circumvent the impact the development would have upon the conservation area and village of Heslington.	Jeanne Lister
Proposed Modification				
PMSID 0865/Mod/SS22(ST27)/1			Remove ST27 from the local plan	Catherine Blacketer

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

Policy SS22 (Site ST27) University of York Expansion				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0881/Mod/SS22(ST27)/ 1			ST27 should be removed from the plan	Cordula Van Wyhe
PMSID 0893/Mod/SS22(ST27)/ 1			Remove ST27 University Expansion Site - Do not think that the University should be allowed to expand into the green belt buffer zone between Heslington Village and Low Lane. The University already exceeds its brief with the original Science Park with many buildings either empty or not used for scientific purposes.	Heather Harris
PMSID 0902/Mod/SS22(ST27)/ 1			Development of ST27 should not go ahead as it's a short sighted land grab and other alternatives are available..	Jacqui & Christopher Chainey & Cadman
PMSID 0907/Mod/SS22(ST27)/ 1			ST27 should not be permitted to expand to the A64	Michael Emmans- Dean
PMSID 0915/Mod/SS22(ST27)/ 1			The respondent believes Green Belt land should be protected in perpetuity and fellow Heslington residents have relayed to the respondent that the local plan is a 'disgrace and shameful'. Site ST27 to be removed from the Local Plan	Jeanne Lister

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

Policy SS23 (Site ST19) Land at Northminster Business Park				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0395-2/LC/SS23(ST19)/1	No		Neighbourhood Plan for Poppleton specifically mentioned that expansion of Northminster Business Park would not be supported outside of its 2017 boundary.	Nigel Thompson
PMSID 0395/LC/SS23(ST19)/1	No		Poppleton Neighbourhood Plan was very specific that expansion of the Northminster Business Park outside its 2017 boundary would not be supported.	Nigel Thompson
PMSID 0395/LC/SS23(ST19)/2			Council is ignoring local democracy and in contradistinction to their response to the inspectors Council has not demonstrated and special circumstances.	Nigel Thompson
PMSID 0871/LC/SS23(ST19)/1	No		Allocation of site SS23 / ST19 overrides the Poppleton Neighbourhood Plan that was clear expansion of the Northminster Business Park beyond its 2017 boundary would not be supported. 91% of residents were in favour of the Neighbourhood Plan. Inclusion of this site does not meet 'exceptional circumstances' and is a violation of the 2011 Localism Act.	Councillor Anne Hook OBO Residents of Rural West York
PMSID 0920/LC/SS23(ST19)/1	No		Neighbourhood Plan for Poppleton specifically mentioned that expansion of Northminster Business Park would not be supported outside of its 2017 boundary.	Nigel Thompson OBO Residents of 1 to 6 Northfield Lane
Soundness				
PMSID 0395/S/SS23(ST19)/1		Not Sound	Not justified to enlarge Northminster Business Park at the expense of the Green Belt when there is plenty of brown field land available within York	Nigel Thompson
PMSID 0395-2/S/SS23(ST19)/1		Not Sound	An expansion of the business park would put even more large traffic down a country lane, leading to congestion, noise and pollution, detracting from the residential amenity and quality of life.	Nigel Thompson
PMSID 0395/S/SS23(ST19)/2		Not Sound	Northminster Business Park is not a special case, therefore inconsistent with the Green Belt policy as laid down in the NPPF.	Nigel Thompson
PMSID 0395-2/S/SS23(ST19)/2		Not Sound	Exceptional circumstances have not been demonstrated. Land surrounding the business park is Grade A agricultural land that once built on, can never be reclaimed, whereas there is plenty of brown field land not yet developed within York.	Nigel Thompson

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

Policy SS23 (Site ST19) Land at Northminster Business Park				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0395/S/SS23(ST19)/3		Not Sound	Northminster Business Park puts at risk a larger section of green belt between the A1237 and the edge of Acomb as this will become cut off from the countryside	Nigel Thompson
PMSID 0395-2/S/SS23(ST19)/3		Not Sound	By including Knapton in the Green Belt this emphasizes the fragility of the Green Belt in this area and therefore makes the expansion of Northminster Business Park inconsistent with the effort to retain the openness of Green Belt.	Nigel Thompson
PMSID 0395/S/SS23(ST19)/4		Not Sound	Expansion of Northminster Business Park will create congestion, noise and pollution down a country lane for which it was never designed. This will detract from the residential amenity and quality of life of Northfield Lane residents.	Nigel Thompson
PMSID 0871/S/SS23(ST19)/1		Not Sound	Expansion of Northminster Business Park is not an exceptional case and expansion would put at risk a larger section of the green belt between the A1237 and edge of Acomb. It is not justified as there is brownfield land in York that should be developed first. Nor is it positively prepared as development would further traffic down a narrow country lane that it was not designed to handle, causing significant congestion, noise and air pollution that would be to detriment of the health and quality of life of residents of Northfield Lane.	Councillor Anne Hook OBO Residents of Rural West York
PMSID 0920/S/SS23(ST19)/1		Not Sound	An expansion of the business park would put even more large traffic down a country lane, leading to congestion, noise and pollution, detracting from the residential amenity and quality of life.	Nigel Thompson OBO Residents of 1 to 6 Northfield Lane
PMSID 0920/S/SS23(ST19)/2		Not Sound	Exceptional circumstances have not been demonstrated. Land surrounding the business park is Grade A agricultural land that once built on, can never be reclaimed, whereas there is plenty of brown field land not yet developed within York.	Nigel Thompson OBO Residents of 1 to 6 Northfield Lane
PMSID 0920/S/SS23(ST19)/3		Not Sound	By including Knapton in the Green Belt this emphasizes the fragility of the Green Belt in this area and therefore makes the expansion of Northminster Business Park inconsistent with the effort to retain the openness of Green Belt.	Nigel Thompson OBO Residents of 1 to 6 Northfield Lane
Proposed Modification				
PMSID 0395/Mod/SS23(ST19)/1			ST19 should be taken out of the Local Plan	Nigel Thompson

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

Policy SS23 (Site ST19) Land at Northminster Business Park				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0395-2/Mod/SS23(ST19)/1			Remove ST19 and Policy SS23 from the Local Plan to protect the Green Belt and residents from expansion of Northminster Business Park outside its 2017 boundary	Nigel Thompson
PMSID 0871/Mod/SS23(ST19)/1			Remove site SS23 / ST19 from table 2 on page 81 of TP1. (Presumably re-instate as green belt)	Councillor Anne Hook OBO Residents of Rural West York
PMSID 0920/Mod/SS23(ST19)/1			Remove ST19 and Policy SS23 from the Local Plan to protect the Green Belt and residents from expansion of Northminster Business Park outside its 2017 boundary	Nigel Thompson OBO Residents of 1 to 6 Northfield Lane

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

Site H7
Bootham Crescent

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0898/S/H7/1			Support allocation of site H7 Bootham Crescent as a site for development. Should the planning application be approved this year as expected (within the monitoring year 2019/2020) it is anticipated that the site can deliver 35 new homes per annum in the monitoring year 2020/2021 onwards. Resulting in the delivery of 80 homes from the site in the first five years post adoption of the Local Plan.	PB Planning (Paul Butler) OBO Persimmon Homes

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

Site H29 Land at Moor Lane Copmanthorpe				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Proposed Modification				
PMSID 0053/Mod/H29/1			In light of population projections since 2018 Local Plan respondent suggests that density numbers in H39 can be reduced from 88 to 60, reflecting average housing density across Copmanthorpe, as identified by the Copmanthorpe Neighbourhood Plan and to be in character with the local area.	Peter Whitfield
PMSID 0171/Mod/H29/1			In light of population projections since 2018 Local Plan respondent suggests that density numbers in H39 can be reduced from 88 to 60, reflecting average housing density across Copmanthorpe, as identified by the Copmanthorpe Neighbourhood Plan and to be in character with the local area.	Megan Taylor
PMSID 0291/Mod/H29/2			The reduced OAHN offers scope for reducing development at H29. The densities should be reduced to those set out in the Copmanthorpe Neighbourhood Plan.	Derek Brown
PMSID 0301/Mod/H29/1			In light of downward revisions to the OAN the opportunity should be taken to reduce the suggested number of dwellings on site H29. This site is identified in the Copmanthorpe Neighbourhood Plan with an estimated yield of 60 dwellings reflecting the average housing density across Copmanthorpe. Local Plan Policy H2 is an indicative guide only and acknowledges that density should be informed by the character of the local area.	Copmanthorpe Parish Council (Robert West)
PMSID 0651/Mod/H29/1			In light of downward revisions to the OAN the opportunity should be taken to reduce the suggested number of dwellings on site H29. This site is identified in the Copmanthorpe Neighbourhood Plan with an estimated yield of 60 dwellings reflecting the average housing density across Copmanthorpe. Local Plan Policy H2 is an indicative guide only and acknowledges that density should be informed by the character of the local area.	David Carr

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

Site H31 Eastfield Lane Dunnington

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0878/S/H31/1		Not Sound	The council should remain committed to building on Brownfield sites. Many housing issues are not down to shortages but housing affordability. H31 Eastfield lane Dunnington was previously identified in 2014 Local Plan for 60 homes, now 76 which would be out of keeping with the village. Part of the land is currently in economic use and would result in loss of jobs. Development would have a detrimental impact on the visual amenity of the village, negative impact on water drainage, traffic would increase impacting on local roads/junctions and pedestrian safety, natural habitats for wildlife would be impacted and productive agricultural land removed. The proposal contravenes CYCs own policy of identifying Brownfield sites and developments in Stamford Bridge makes the development of this site unnecessary.	Sarah Mills
PMSID 0879/S/H31/1		Not Sound	Significant changes have been made to the Plan but no opportunity given to comment - in the latest version of documents the Green Belt boundaries have been published with rational yet proposed developments that are impacted by this area not listed as PMs, specifically H31. Effective consultation would allow for a round of feedback on specific points that have changed the circumstances of proposed development. The council should remain committed to building on Brownfield sites. Many housing issues are not down to shortages but housing affordability. H31 Eastfield lane Dunnington was previously identified in 2014 Local Plan for 60 homes, now 76 which would be out of keeping with the village. Part of the land is currently in economic use and would result in loss of jobs. Development would have a detrimental impact on the visual amenity of the village, negative impact on water drainage, traffic would increase impacting on local roads/junctions and pedestrian safety, natural habitats for wildlife would be impacted and productive agricultural land removed. The proposal contravenes CYCs own policy of identifying Brownfield sites and developments in Stamford Bridge makes the development of this site unnecessary.	Pat Mills
Proposed Modification				
PMSID 0878/Mod/H31/1			Remove H31 Eastfield Lane Dunnington from the Plan - 76 homes would be out of keeping with the village. Part of the land is currently in economic use and would result in loss of jobs. Development would have a detrimental impact on the visual amenity of the village, negative impact on water drainage, traffic would increase impacting on local roads/junctions and pedestrian safety, natural habitats for wildlife would be impacted and productive agricultural land removed. The proposal contravenes CYCs own policy of identifying Brownfield sites and developments in Stamford Bridge makes the development of this site unnecessary.	Sarah Mills
PMSID 0879/Mod/H31/1			Remove H31 Eastfield Lane Dunnington - 76 homes would be out of keeping with the village. Part of the land is currently in economic use and would result in loss of jobs. Development would have a detrimental impact on the visual amenity of the village, negative impact on water drainage, traffic would increase impacting on local roads/junctions and pedestrian safety, natural habitats for wildlife would be impacted and productive agricultural land removed. The proposal contravenes CYCs own policy of identifying Brownfield sites and developments in Stamford Bridge makes the development of this site unnecessary.	Pat Mills

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

Site H38
Land RO Rufforth Primary School Rufforth

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0598/S/H38/2	Not Sound		Supports continued allocation of site H38 Rufforth Primary School.	DPP (Mark Lane) OBO Linden Homes Strategic Land

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

Site H39 North of Church Lane Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0083/LC/H39/1	No		Exceptional Circumstances' should not be used to justify destructive development of the green belt. Particularly ST15 and H39. 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.	Rosemary Tozer
PMSID 0084/LC/H39/1	No		Proposals relating to Elvington have been made without direct engagement with the village and previous responses have been ignored. Elvington Parish Council have not been engaged with.	Tim Tozer
PMSID 0873/LC/H39/1	No		Respondent believes expansion would be a massive over development of the village and that it's unnecessary as ST15 will be less than 2 miles away. The expansion would cause traffic misery and more potential danger to children who play on Beckside. Proposed site regularly floods.	Ian Hudson
PMSID 0905/LC/H39/1	No		No specific details provided	Graham Holme
PMSID 0908-2/LC/H39/1	No		Refer to soundness for further comments	John Gallery
Soundness				
PMSID 0083/S/H39/1		Not Sound	Object to allocation H39 - a destructive development that does not have any exceptional circumstances that would justify its removal from the green belt .	Rosemary Tozer
PMSID 0084/S/H39/1		Not Sound	The prime emphasis on developing H39 is that there a willing landowner wishing to sell. The statement about access to services and transport are disingenuous due to traffic and concerns in Beckside. The statement relating to exceptional circumstances and the need the houses is not an excuse to change the rural nature of the village. Do not agree with the green belt purposes relating to Elvington re H39 (commenting on Purposes 1,3 and 4) and the detailed boundary issues statement that the recognisable and permanent features is manifestly untrue in relation to the western boundary. Positive preparation should also go a lot further in exploring the opportunities, constraints and impact of the massive development ST15. The Local Plan is not justified as it is not the most appropriate strategy when considering reasonable alternatives such as H26 rather than H39 as a development site. The Plan is not effective as there has been a failure to engage with the Parish Council. And not consistent with national policy that states planning should empower local people to shape their surroundings.	Tim Tozer

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

Site H39 North of Church Lane Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0222/S/H39/1		Not Sound	Opposed to H39 as previous Planning Inspector confirmed that H39 serves Green Belt purposes. Additional traffic from development would adversely affect existing estate. Estate is already disproportionately large and densely populated thereby adding to the imbalance between the existing estate and other areas of the village.	Joanne Wedgwood
PMSID 0227/S/H39/1		Not Sound	Opposed to H39 as previous planning inspector confirmed that H39 serves Green Belt purposes. Additional traffic from development would adversely affect existing estate. Estate is already disproportionately large and densely populated thereby adding to the imbalance between the existing estate and other areas of the village.	Matthew Wedgwood
PMSID 0261/S/H39/1		Not Sound	Proposals for development of H39 are continually being promoted regardless of access, wildlife and scale concerns, whilst a more suitable site H26 Dauby lane would join the village together creating a better community without the access issues of H39.	Amanda Moore
PMSID 0333/S/H39/1			Modifications state that account should be taken of development within or setting of the conservation area. This is not being done for H39.	Alison Stead
PMSID 0333/S/H39/1		Not Sound	The modification at PM26 is ok but is not being followed through in the case of H39 North of church lane where the building proposal is not taking into account the buffer zone needed to a Site of local interest viz Hedgerow E50 and proximity of Derwent Ings SSSI. Evidence is required to show that the modification is being implemented when building proposals are put forward for this site.	Alison Stead
PMSID 0333/S/H39/2		Not Sound	Modifications state that account should be taken of development within or setting of the conservation area. This is not being done for H39 and a modification is being proposed for the green belt which is NOT listed in the proposed modifications. I oppose the removal of green belt status in Elvington. CYC TP1 Approach to Defining York's Green Belt Addendum Section 9 conclusions describes the exceptional circumstances that exist in order to justify releasing land from the green belt. These exceptional circumstances do not I believe apply to H39 given the key areas of openness identified in the conservation area. Alternative site H26 is preferable for housing. Urge CYC to reinstate H26 and restore the green belt to Elvington and remove H39 building proposal. In the 2018 CYC Preferred Sites Consultation it was stated that H26 provides a gap between the main village and the industrial/commercial areas to the north - this is erroneous and would be obvious on a site visit.	Alison Stead
PMSID 0333-2/S/H39/2			CYC TP1 Approach to Defining York's Green Belt Addendum Section 9 conclusions describes the exceptional circumstances that exist in order to justify releasing land from the green belt. These exceptional circumstances do not I believe apply to H39 given the key areas of openness identified in the conservation area.	Alison Stead

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

Site H39 North of Church Lane Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0420 - 1/S/H39/1		Not Sound	Elvington Parish Council and its residents did not support allocation of H39 - rather H26 Dauby Lane was supported. H26 is a logical join of the village yet CYC believe that H26 would cause a significant change to the form of the village which is illogical. H26 is on the main road, whereas H39 is on a quiet rural lane that will alter the rural feel and character of Beckside.	Jane Moorhouse
PMSID 0873/S/H39/1		Not Sound	Overdevelopment of village is not necessary when building a new town 2 miles away	Ian Hudson
PMSID 0874/S/H39/1		Not Sound	Character of the village will be radically changed by the proposed development and does not have the infrastructure to cope.	Bryan Boulter
PMSID 0876-2/S/H39/1	No	Not Sound	It cannot be positively prepared if CYC misunderstand that the village is not opposed to H26 (Dauby Lane) and does not oppose the joining up of the village. CYC are not justified in proposing H39 instead of H26	Joanne Kinder
PMSID 0877/S/H39/1			Object to the allocation of H39 - valuable meadowland that should not be removed from green belt. Access concerns that would cause traffic and safety issues	James McBride
PMSID 0880/S/H39/1		Not Sound	Object to H39 - extra traffic generated from development of this site will have a negative impact on existing residents of Beckside and more traffic would be added to the centre of the village. The proposal would not provide the type of housing needed within the village (affordable and top end). There is a better option for development within the village (H26). Where will construction traffic reach the site. The hedge between H39 and Church Lane is listed.	Edmund Kinder
PMSID 0882/S/H39/1	No		Opposes development of site H39, should remain in the Green Belt. Residents of Elvington's views have been ignored.	Simon Willis
PMSID 0882/S/H39/1		Not Sound	Oppose development of site H39 as it is not supported by local residents or the Parish Council as it would have unacceptable impacts on traffic and congestion. Development of this size is unacceptable for the centre of a village.	Simon Willis
PMSID 0882/S/H39/3		Not Sound	Oppose development of site H39 as the land on either side of Church Lane is a mixture of wildflower meadows and grassland that provide important habitats for local wildlife. Development would be counter to the Plan's stated objectives of protecting biodiversity.	Simon Willis
PMSID 0905/S/H39/1		Not Sound	An Inspector previously determined H39 serves green belt purposes - the extra traffic from 32 homes would impact on existing residents of Beckside. The housing density should reflect existing estate.	Graham Holme
PMSID 0908-2/S/H39/1		Not Sound	Respondent believes that H39 is not a suitable location. Parish Council's preferred suggestion of H26 was not included for allocation by Council planners, because it provides a gap between industrial and residential areas. Planners offered H39 as a logical extension of the village. This reasoning appears irrational to the respondent.	John Gallery

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

Site H39 North of Church Lane Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0908-2/S/H39/2			H26 provides better access, has natural tree screening and being a larger site would allow for a better mix of housing. The village needs more affordable houses and family homes. In addition to bringing the village and Elvington Park closer together, H26 is closer to established facilities, including nearer to the primary school and would reduce additional traffic compared to H39.	John Gallery
Proposed Modification				
PMSID 0083/Mod/H39/1			Deletion of H39 with the retention of the site as green belt land.	Rosemary Tozer
PMSID 0084/Mod/H39/1			Remove site H39 which is not supported by local residents due to environmental and conservation area grounds and retain it as a green belt site,	Tim Tozer
PMSID 0092/Mod/H39/1			Does not want the H39 housing development in Elvington	Jonathan Shaw
PMSID 0102/Mod/H39/1			To continue to include H39 is at direct odds to the wishes of the residents. Identifies several problems with the site. A Planning Inspector previously determined that H39 serves Green Belt purposes. The extra traffic that would be generated from 32 houses would adversely impact on the existing residents of Beckside. Density should have been commensurate with the existing Beckside development to minimise any 'difference' to the phases. Site should be withdrawn from the plan and replaced by H26 'Dauby Lane'.	Elvington Parish Council (David Headlam)
PMSID 0222/Mod/H39/1			Better to link up two halves of the village using H26. This would calm traffic in a built up area, make the village feel more integrated and allow for a larger amount of houses	Joanne Wedgwood
PMSID 0227/Mod/H39/1			Better to link up two halves of the village using H26. This would calm traffic in a built up area, make the village feel more integrated and allow for a larger amount of houses	Matthew Wedgwood
PMSID 0261/Mod/H39/1			Removal of H39 as H26 is a more suitable development site	Amanda Moore
PMSID 0333-2/Mod/H39/1			Remove site H39, which is not supported by local residents due to environmental and conservation area grounds	Alison Stead

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

Site H39 North of Church Lane Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0420 - 1/Mod/H39/1			Delete H39 and replace with H26 Dauby Lane that is a more suitable site	Jane Moorhouse
PMSID 0873/Mod/H39/1			Do not remove Green Belt from village and build H39 when there is no evidence of more housing need in village and there are to be 3339 houses built less than 2 miles away	Ian Hudson
PMSID 0877/Mod/H39/1			Remove H39 from Plan - valuable meadowland that should not be removed from green belt. Access concerns that would cause traffic and safety issues	James McBride
PMSID 0880/Mod/H39/1			H39 should be withdrawn from the Plan and if extra housing in Elvington is required H26 (Dauby Lane) should be considered, it is a much more viable option and will provide more of the type of houses needed in the village.	Edmund Kinder
PMSID 0908-2/Mod/H39/1	No		Refer to soundness for further commentsRemove H39 from the draft Local Plan and replace it with H26	John Gallery

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

Site H53
Land at Knapton Village

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Soundness

PMSID 0368/S/H53/4

Respondent supports the retention of H53 but disagrees with inclusion of village within Green Belt.

Indigo Planning
(Now part of WSP)
(Matthew Stocks)
OBO Novus
Investments

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

Site SP1 The Stables Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0191-1/LC/SP1/1			Fails tests of legal compliance for Traveller's sites in rural environments whether Greenbelt or otherwise.. Not compliant with National Policy greenbelt PPG2 or National Policy for Travellers (Policies) B, C, D, E & F. It's also against government policy to take out Greenbelt in response to previous applications	Martin Moorhouse
PMSID 0191-2/LC/SP1/1	No		Respondent feels the plan is discriminatory	Martin Moorhouse
PMSID 0191-3/LC/SP1/1	No		No attempt has been made at true consultation with local people	Martin Moorhouse
PMSID 0191-1/LC/SP1/2	No		Refer to soundness for further comments	Martin Moorhouse
PMSID 0191-1/LC/SP1/3	No		CYC officers failed in their duty to consult the settled community as well as the applicants	Martin Moorhouse
Soundness				
PMSID 0191-2/S/SP1/1		Not Sound	Respondent requests equal treatment of their property. Refer to PMSID 0191-1 for previous objections	Martin Moorhouse
PMSID 0191-1/S/SP1/1		Not Sound	Decision to remove SP1 from Green Belt represents clear discrimination against settled community.	Martin Moorhouse
PMSID 0191-1/S/SP1/3			Council is reversing decisions where the site was refused permission 3 times by CYC and 2 times by Planning Inspectorate, in addition to making no effort to find an alternate.	Martin Moorhouse
PMSID 0191-1/S/SP1/4			CYC has prepared policies to ensure success of the site and how its inclusion in the Local Plan goes against NPP Guidelines and local consultation. The proposal fails to meet tests of legality, fairness, equality and consultation in addition to contravening principles of the Greenbelt	Martin Moorhouse
PMSID 0191-1/S/SP1/5			Site failed tests of the Strategic Housing Land Availability assessment which appear to have been ignored	Martin Moorhouse
PMSID 0222/S/SP1/1		Not Sound	Site SP1 should be removed from plan. Previous planning inspector's ruling stated that permission was only temporary. Site has already been rejected more than once for residential development. Because CYC has failed to find more suitable site does not mean the site has become suitable. All previous reasons for planning refusals still stand.	Joanne Wedgwood

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

Site SP1 The Stables Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0227/S/SP1/1		Not Sound	Site SP1 should be removed from plan. Previous planning inspector's ruling stated that permission was only temporary. Site has already been rejected more than once for residential development. Because CYC has failed to find more suitable site does not mean the site has become suitable. All previous reasons for planning refusals still stand.	Matthew Wedgwood
PMSID 0420 - 1/S/SP1/1		Not Sound	SP1 (Table 2) is described as a Village extension, whereas H26 is not - why? SP1 should be deleted as per the previous Inspector Decision allowing the travelling showperson site should only be for a temporary period until CYC found more suitable sites. 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.	Jane Moorhouse
PMSID 0874/S/SP1/1		Not Sound	Character of the village will be radically changed by the proposed development and does not have the infrastructure to cope.	Bryan Boulter
PMSID 0877/S/SP1/1			Object to SP1 The Stables Elvington Lane - why is this in the village as 3 plots for travelling show persons when there is a huge development in ST15 that could be used for this purpose.	James McBride
Proposed Modification				
PMSID 0073/Mod/SP1/1			Respondent wants SP1 removing from the Plan.	Peter Heptinstall
PMSID 0102/Mod/SP1/1			Travelling Showpersons should receive no special treatment. 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.	Elvington Parish Council (David Headlam)
PMSID 0191-2/Mod/SP1/1			Respondent requests equal treatment in that their property is also removed from the Green Belt. Being between SP1 and ST26 the respondent feels that it would be incongruous and unreasonable to be treated any differently	Martin Moorhouse
PMSID 0191-1/Mod/SP1/1			Local Plan should be rejected and the responsibility taken over by National Government.	Martin Moorhouse
PMSID 0191-1/Mod/SP1/2			CYC has identified significant areas of brown field land - so CYC could use a suitable alternative brown field site for a proposed SP1 site instead of current proposal at The Stables	Martin Moorhouse
PMSID 0222/Mod/SP1/1			SP1 should be removed from plan	Joanne Wedgwood

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

Site SP1 The Stables Elvington				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0227/Mod/SP1/3			SP1 should be removed from plan	Matthew Wedgwood
PMSID 0420 - 1/Mod/SP1/1			Delete SP1 as per the previous Inspector Decision allowing the travelling showperson site should only be for a temporary period until CYC found more suitable sites.	Jane Moorhouse
PMSID 0877/Mod/SP1/1			Remove SP1 The Stables Elvington Lane - why is this in the village as 3 plots for travelling show persons when there is a huge development in ST15 that could be used for this purpose.	James McBride

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

Site E9 Elvington Industrial Estate				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0222/S/E9/1		Sound	Supports anything bringing jobs to local economy. Respondent thinks site is paddock and not brown field site.	Joanne Wedgwood
PMSID 0227/S/E9/1		Sound	Supports anything bringing jobs to local economy. Respondent thinks site is paddock and not brown field site.	Matthew Wedgwood
PMSID 0874/S/E9/1		Not Sound	Character of the village will be radically changed by the proposed development and does not have the infrastructure to cope.	Bryan Boulter
PMSID 0877/S/E9/1			Object to E9 Elvington Industrial Estate-	James McBride
Proposed Modification				
PMSID 0222/Mod/E9/1			Needs to be some form of traffic management plan to limit number of HGVs travelling through the centre of the village.	Joanne Wedgwood
PMSID 0227/Mod/E9/1			Needs to be some form of traffic management plan to limit number of HGVs travelling through the centre of the village.	Matthew Wedgwood
PMSID 0877/Mod/E9/1			Request removal of E9 Elvington Industrial Estate from the Plan	James McBride

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0181/S/Alt/1			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	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments
PMSID 0333-2/S/PM25/2			Alternative site H26 is preferable to H39 for housing. Urge CYC to reinstate H26 and restore the green belt to Elvington and remove H39 building proposal.	Alison Stead
PMSID 0592/S/Alt/1		Not Sound	Church Balk Dunnington (H33) - this allocation has not been retained in this version of the Plan. To meet the housing requirement this site is a viable and deliverable site with a willing landowner and potential for 40% affordable housing. The site can deliver in the first 5 years of the Plan. The site would provide a consistent boundary to the northern edge of Dunnington and would not impact on the York Moraine or historic setting of the village.	ONEill Associates (Graeme Holbeck) OBO Yorvik Homes
PMSID 0598/S/Alt/1		Not Sound	With housing need incorrectly revised downwards the site SF15 Land North of Escrick and SF4 Land North of Haxby have been removed from the plan. Oppose deletion of these sites, as both have previously been found suitable for allocation.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0598/S/Alt/2		Not Sound	With housing need incorrectly revised downwards the site 882 Land at Askham Lane, Acomb has been removed from the plan. Oppose deletion of this site, as it has previously been found suitable for allocation. Also opposes the absence of a safeguarded land policy in the latest version of the plan.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0601/S/Alt/1		Not Sound	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.	DPP Planning (Claire Linley) OBO PJ Procter
PMSID 0620/S/Alt/1		Not Sound	Alt Site 891 - Galtres Garden Village. 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.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0894/S/Alt/1		Not Sound	An alternative housing development site at Boroughbridge Road could provide, significant contribution towards affordable housing, improve soundness of plan and make it consistent with national policy. The allocation is considered sustainable and a provides a new, strong and defensible Green Belt boundary that will last beyond the plan period.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0901/S/Alt/1			Northfields, together with land to the east of Haxby Road known as Mille Crux, forms a 24ha site which since 2012 has been the focus of major investment by York St John University to develop a new centre for sporting excellence. Both Northfields and the Mille Crux site are allocated in the Proposals Map (North) for the emerging Plan as areas of 'Existing University Campuses' and 'Existing Openspace'. Northfields has an additional designation as being within Green Belt land. Policy ED5 of the Plan states the land at Northfield is allocated for sport uses to support the continued success of York St. John University, but omits to include the Mille Crux site from this allocation. It is assumed that this omission is a drafting error, and that Policy ED5 should allocate both Northfields and Mille Crux sites for sport uses, as supported by the explanatory text for this policy and the draft Proposals Map (North).	O'Neill Associates (Phillip Homes) OBO York St John University

Proposed Modification

PMSID 0060/ Mod/Alt/1			Land at existing Gypsy and Traveller site at Clifton should be allocated for a 6-8 pitch extension.	Michael Hargreaves Planning OBO York Travellers Trust
PMSID 0083/ Mod/Alt/1			Reinstatement of H26 as opposed to H39 as it is a more suitable site for development.	Rosemary Tozer
PMSID 0084/ Mod/Alt/1			Re-instate H26 for housing allocation	Tim Tozer
PMSID 0091/ Mod/Alt/2			Site H37 is specifically excluded from the area of coalescence, Haxby is a sustainable location, is excluded from the area of the City essential to preventing coalescence, excluded from nature Conservation sites and excluded from the strategic area to keep permanently open. It does not have a harmful impact on the historic setting of York and it is illogical to have remove this site as a draft housing allocation.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0091/ Mod/Alt/3			If the plan is to match government's desire to boost house building, be found sound & ensure delivery of housing then the plan should rely less on large strategic sites. Re-instatement of smaller sites, such as H37, which previous evidence shows is suitable will ensure a sound plan.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/ Mod/Alt/4			If not re-instated as a housing allocation then site H37 should not be included in the greenbelt but instead designated as safeguarded land, this would reflect previous allocation & suitability of the site for future development.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/5			A more appropriate housing strategy would have greater reliance on a range of smaller sites. Refers to the reinstatement of housing allocations in Table 1-3 and in particular site H37 of the Officer's Report LPWG 23.01.18	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/6			H2a: Racecourse stables off Tadcaster Road - By reinstating this site as a draft allocation the council will secure the optimum delivery for housing over the planned period	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/ Mod/Alt/8			H2b: land at Cherry Lane - By reinstating this site as a draft allocation the council will secure the optimum delivery for housing over the planned period	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/ Mod/Alt/11			H28: Land North of North lane Wheldrake - By reinstating this site as a draft allocation the council will secure the optimum delivery for housing over the planned period	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0091/Mod/Alt/14			SF10: Land North of Riverside Gardens Elvington - By reinstating this site as a draft allocation the council will secure the optimum delivery for housing over the planned period	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/15			964: Galtres Farm- By reinstating this site as a draft allocation the council will secure the optimum delivery for housing over the planned period	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0102/Mod/Alt/1			Nearly all residents through parish council consultations want to link the two residential areas of the village. H26 is a way of satisfying that need as well as increasing the housing stock. H26 should contain a better mix of housing type, especially larger houses to meet another clearly identified local need. A total of around 60 dwellings is considered suitable for the site.	Elvington Parish Council (David Headlam)
PMSID 0102/Mod/Alt/2			The first version of the Local Plan included ST15 as 'Whinthorpe'. This was significantly better sited than the current proposals, being much closer to the A64 – its principal access point. This allowed for the retention of the airfield runway and lessened the adverse impact on Elvington and Wheldrake. The A64 clearly separates the site from Heslington so the visual and auditory impact on that village would be minimal. The adverse ecological impact of ST15 would be less if it were sited north as originally proposed.	Elvington Parish Council (David Headlam)
PMSID 0122/Mod/Alt/1			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. (Alt Site 982)	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0122/Mod/Alt/3			Former H2a - 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.	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0125-7/Mod/Alt/1			Alt Site 165 - 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.	Persimmon Homes (Jess Kiely)

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0125-4/Mod/Alt/2			Alt Site 170 - 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.	Persimmon Homes (Jess Kiely)
PMSID 0125-2/Mod/Alt/3			Alt Site 171 - 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.	Persimmon Homes (Jess Kiely)
PMSID 0125-6/Mod/Alt/4			Alt Site 787 - Remove alt site 787, Stockton Lane (formerly part of ST7) from the green belt and include as an allocation for development. Able to deliver 100 dwellings and contribute to meeting York's true housing need.	Persimmon Homes (Jess Kiely)
PMSID 0125-5/Mod/Alt/5			Former SF12 - 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.	Persimmon Homes (Jess Kiely)
PMSID 0141/Mod/Alt/1			Alt Site 873 - Naburn Business Park (alt site 873) 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, which could be delivered immediately to meet York's unmet employment needs.	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0181/Mod/Alt/1			Alt Sites 221 to 224 - 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	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments
PMSID 0210/Mod/Alt/1			Alt Site 970 - 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	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/Mod/Alt/2			Alt Site 971 - 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	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0214/Mod/Alt/1			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.	O'Neill Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0218/Mod/Alt/1			Alt Site 955 - Poppleton Glassworks (alt site 955, reference SE55-05YK) 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.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund
PMSID 0220/Mod/Alt/1			Former SF5 - 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. The site would form a logical extension to Copmanthorpe village, and could be developed separately or as part of an integrated development in conjunction with other adjacent sites, presenting opportunities for new facilities and services serving the village. It would also redress the emerging Plan's lack of new housing sites in the southwest of the City, helping to ensure choice and competition in the market for land. It is further held that any issues relating to containment and definition of its boundaries could be addressed, and that there are no insurmountable access or other technical issues which would preclude delivery of a high quality, sustainable residential development with a suitable mix of affordable and market housing.	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson
PMSID 0222/Mod/Alt/1			Better to link up two halves of the village using H26. This would calm traffic in a built up area, make the village feel more integrated and allow for a larger amount of houses	Joanne Wedgwood
PMSID 0227/Mod/Alt/1			Better to link up two halves of the village using H26. This would calm traffic in a built up area, make the village feel more integrated and allow for a larger amount of houses	Matthew Wedgwood
PMSID 0261/Mod/Alt/1			Previous allocation H26 Dauby lane Elvington should be considered for development rather than H39 whilst Elvington should remain in the green belt	Amanda Moore
PMSID 0333-2/Mod/Alt/1			Urge CYC to reinstate H26 and restore the green belt in Elvington and remove H39 building proposals. H26 sit effectively a brownfield site based on previous activity.	Alison Stead

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0350/Mod/Alt/1			Alt Site 959 - In order to meet York's true housing need SHLAA site at Kettlestring Lane, Clifton Moor should be included in the plan as a housing allocation.	Carter Jonas (Simon Grundy) OBO Picton Capital
PMSID 0357/Mod/Alt/1			Alt Site 4 - 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. The proposed reduction in OAN is unjustified bearing in mind the Government's decision not to use the 2016-based projections for the standard method. If the OAN is not increased to reflect the evidence it is maintained that additional sites should be identified to meet the need for older person housing.	ID Planning (Richard Irving) OBO Green Developments
PMSID 0376/Mod/Alt/1			Sites 891/922 - 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.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0376-2/Mod/Alt/1			Former ST12 - 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.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd
PMSID 0389/Mod/Alt/1			We have repeatedly suggested extra dwellings in the middle of the village (formerly H26) opposite the medical centre in order to join the two distinct halves of the village.	Sandra Atkinson
PMSID 0420 -1/Mod/Alt/1			Re-instate H26 for housing allocation as a more suitable site than H39	Jane Moorhouse
PMSID 0585/Mod/Alt/1			Proposed boundary alteration at ST7, pulling the site to the north and towards the urban edge.	Johnson Mowat (Mark Johnson) OBO Taylor Wimpey UK Limited
PMSID 0589/Mod/Alt/1			Alt Site 957 - Malton Road Industrial Estate -14.66 hectares at the Malton Road 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.	ONeill Associates (Eamonn Keogh) OBO Malton Road Developments Ltd

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0592/Mod/Alt/1			Church Balk Dunnington (H33) - this allocation has not been retained in this version of the Plan. To meet the housing requirement this site is a viable and deliverable site with a willing landowner and potential for 40% affordable housing. The site can deliver in the first 5 years of the Plan.	ONEILL Associates (Graeme Holbeck) OBO Yorvik Homes
PMSID 0594-2/Mod/Alt/1			Note support for CYC's identification of ST7 as a Garden Viillage but request amended red line boundary. Current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver. Note alternative access to ST7, connecting east-west along Bad Bargain Lane.	PB Planning (Paul Butler) OBO TW Fields
PMSID 0598/Mod/Alt/1			Former SF15 and Former SF4 - Re-instate sites SF15 Land North of Escrick and SF4 Land North of Haxby to help meet true housing need.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0598/Mod/Alt/2			Alt Site 882 Land at Askham Lane Acomb - Re-instate to help meet true housing need. If not for development than at least allocation as safe guarded land.	DPP (Mark Lane) OBO Linden Homes Strategic Land
PMSID 0600/Mod/Alt/1			Former ST13 - Land off Moor Lane Copmanthorpe - Re-instate site to help meet true housing need.	DPP (Mark Lane) OBO Shepherd Homes
PMSID 0603/Mod/Alt/1			Alt Site 629 (Check) Land at the Retreat. CYC should exclude The Retreat from the Green Belt as the site's boundaries are recognisable and permanent therefore in line with NPPF 2019, paragraph 129.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0607/ModAlt/1			Remove land at The Brecks, Strensall (Site 49) from the 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.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0607/Mod/Alt/1			Former H27 - Alt Site 49 - The Brecks, Strensall - 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.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0620/Mod/Alt/1			Alt Site 891/922 Check - Galtres Garden Village.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.	Eamonn Keogh ONeill Associates OBO Galtres Village Development Company
PMSID 0827-1/Mod/Alt/1			Move the inner green belt boundary to the York Outer Ring Road which can endure as an identifiable physical feature. This would provide adequate land for growth well beyond the plan period.	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0856/Mod/Alt/1			Alt Site 720 - Would like to see allocated medical facilities	John Young
PMSID 0866/Mod/Alt/1			Re-instate site H28 to help meet true housing need.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0867/Mod/Alt/1			Re-instate site H26 to help meet true housing need.	DPP (Mark Lane) OBO Yorvik Homes
PMSID 0870/Mod/Alt/1			Respondent wishes to have Duncombe Farm, Strensall, to be included in the Local Development Plan	J Philip Coverdale
PMSID 0876-2/Mod/Alt/1			Respondent seeks re-allocation of former site H26 - The village is not opposed to H26 (Dauby Lane) and does not oppose the joining up of the village. CYC are not justified in proposing H39 instead of H26	Joanne Kinder

13. Alternative Sites proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0890/Mod/Alt/1			Allocate further sites for development and as safeguarded land. Include alt site 737 Stock Hill Field, West of Church Balk, Dunnington 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.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0894/Mod/Alt/1			A further significant contribution to affordable housing could be provided through allocating former ST29 at Boroughbridge Road. Allocating this site would improve the soundness of the plan and make it consistent with national policy. 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.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0895/Mod/Alt/2			Reconsider SHLAA 180/H50 ad designate as draft housing allocation	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0905/Mod/Alt/1			Remove H39 and replace with previous allocation H26 Dauby Lane. Approx a third of housing in the village is west of the school, H26 would help satisfy the need and increase the housing stock providing a better mix to meet the clear need in the village. CYC continue to ignore wishes of the local community imposing H39 rather than H26.	Graham Holme

14. Alternative GB boundaries proposed through consultation

Policy SS9 (Site ST7)
Land East of Metcalfe Lane

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0594/S/SS9(ST7)/3			Evidence presented confirms that each of the proposed development options for the site has adhered to CYC's analysis of the Green Belt in this location of the City and each of the key planning parameters that need to be followed in order to protect the City's setting and character.	PB Planning (Paul Butler) OBO TW Fields
Proposed Modification				
PMSID 0339/Mod/SS9(ST7)/1			Green belt assessment determined ST7 Land east of Metcalfe Lane is situated within areas of land do not need to be kept permanently open, and as such they no longer meet the purposes of retaining land within the Green Belt. In order to meet York's true housing need the site should be expanded.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes

14. Alternative GB boundaries proposed through consultation

Policy SS10 (Site ST8)
Land North of Monks Cross

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Proposed Modification				
PMSID 0582/S/SS10(ST8)/3			On behalf of the landowners, we maintain our objection to the removal of land (identified in orange on the cover of he statement) from strategic site ST8 and maintain that the proposed resultant identification of land immediately west of Site ST8 as Green Belt is inappropriate, as it would serve no Green Belt function. Thereby propose that this land should not be included in the Green Belt and the site extended.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson

14. Alternative GB boundaries proposed through consultation

Policy SS12 (Site ST14)
Land West of Wigginton Road

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0621/S/TP1Add/1		Sound	<p>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.</p> <p>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.</p> <p>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.</p>	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields

14. Alternative GB boundaries proposed through consultation

Policy SS13 (Site ST15) Land West of Elvington Lane

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0872/LC/SS13(ST15)/1			Opposes inclusion of site ST15 because of negative impact on the historical character of Heslington.	Jeffrey Stern
PMSID 0913 - 3/LC/SS13(ST15)/1	No		No specific details provided	Sally Hawkswell
Soundness				
PMSID 0378/S/SS13(ST15)/2			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.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0874/S/SS13(ST15)/1			Character of the village will be radically changed by the proposed development and does not have the infrastructure to cope.	Bryan Boulter
PMSID 0899/S/SS13(ST15)/2		Not Sound	Object to the proposed development of ST15 for 3300 homes and have concerns about the impact this would have on the city in terms of sustainability and the affect on the environment - particularly in respect of green belt land that plays a crucial role in bio-diversity.	Holly Steel
PMSID 0903/S/SS13(ST15)/2		Not Sound	The two ends of Elvington Airfield have not been included yet green belt has been taken for this development.	Maurice Dodson
PMSID 0913 - 3/S/SS13(ST15)/1		Not Sound	ST15 Garden Villages were rejected as unsustainable by a previous government. This is supposedly a brownfield development however airfields have been proven to be a wildlife rich habitat. The only brownfield parts of the site are hangars and runway. Access on to the A64 would be hazardous and would also add to climate change. This is too large for development out of town without public transport. Water supplies need consideration together with sewerage requirements. It is not sound as not sustainable.	Sally Hawkswell
Proposed Modification				

14. Alternative GB boundaries proposed through consultation

Policy SS13 (Site ST15) Land West of Elvington Lane

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0102/Mod/SS13(ST15)/ 2			Annex 5, page A4.14. There are three fundamental errors in the assessment of ST15. As indicated in the Inspector's refusal of earlier plans for the airfield (04/04316/FULM) the entire site is Green Belt, there is no brownfield land. The council's own map indicates the airfield as a nature conservation site. Misleading in that the originally proposed site for ST15 is no more visible from the A64 than the new proposed site. Queried why cars driving on the A64 be treated as more important than the residents of York or the economy of York.	Elvington Parish Council (David Headlam)
PMSID 0222/Mod/SS13(ST15)/ 2			Heritage of whole site should be preserved. The site brings in a hundred thousand visitors each year with activities related to the airfield. Additionally the Maize Maze should be protected and its countryside setting retained.	Joanne Wedgwood
PMSID 0227/Mod/SS13(ST15)/ 2			Heritage of whole site should be preserved. The site brings in a hundred thousand visitors each year with activities related to the airfield. Additionally the Maize Maze should be protected and its countryside setting retained.	Matthew Wedgwood
PMSID 0378/Mod/SS13(ST15)/ 2			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 state that it can be demonstrated that the alternative site is capable of assisting the five purposes of the Green Belt and ensuring that the resultant Green Belt boundary endures beyond the plan period while being appropriate in heritage terms.	Quod (Tim Waring) OBO Langwith Development Group
PMSID 0915/Mod/SS13(ST15)/ 1			The respondent believes Green Belt land should be protected in perpetuity and fellow Heslington residents have relayed to the respondent that the local plan is a 'disgrace and shameful'. Site ST15 to be removed from the Local Plan	Jeanne Lister

14. Alternative GB boundaries proposed through consultation

Policy SS18 (Site ST33) Station Yard, Wheldrake

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0342/S/SS18(ST33)/3		Not Sound	In some instances 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.	Andy Bell
PMSID 0909/S/SS18(ST33)/3		Not Sound	In some instances 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.	Sophie Bell
Proposed Modification				
PMSID 342/Mod/SS18(ST33)/1			Object to removal of ST33 from the Green Belt. ST33 when submitted as 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 . Purposes 1, 3 & 4 for Green Belt have been ignored/incorrect for ST33. 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. In the case of ST33 the educational exceptional circumstances only arise if development proceeds and then becomes requirement.	Andy Bell
PMSID 909/Mod/SS18(ST33)/1			Object to removal of ST33 from the Green Belt. ST33 when submitted as 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 . Purposes 1, 3 & 4 for Green Belt have been ignored/incorrect for ST33. 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. In the case of ST33 the educational exceptional circumstances only arise if development proceeds and then becomes requirement.	Sophie Bell

14. Alternative GB boundaries proposed through consultation

Policy SS20 (Site ST36)
Imphal Barracks, Fulford Road

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
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Soundness

PMSID 0345/S/SS20(ST36)/1			<p>There is an error in the way in which the inner Green Belt boundary is defined in the vicinity of Imphal Barracks. A proper assessment of the land to the immediate east confirms that: 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; 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.</p>	<p>Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)</p>
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Proposed Modification

PMSID 0345/Mod/SS20(ST36)/ 2			<p>Imphal Barracks should be excluded form the GreenBelt as: his 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; 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</p>	<p>Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)</p>
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14. Alternative GB boundaries proposed through consultation

Policy SS22 (Site ST27) University of York Expansion

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0913 - 1/LC/SS22(ST27)/1	No			Sally Hawkswell
Soundness				
PMSID 0913 - 1/S/SS22(ST27)/1		Not Sound	ST27 is totally unsustainable traffic reliant with no public transport. Development would result in the removal of good quality agricultural land . Brownfield sites should be developed first rather than use the easiest option. With so much development within the local area means this large development is no longer necessary. Climate change is a greater threat. York University should be leading by example and not taking land out of the green belt then selling off properties to private businesses.	Sally Hawkswell
Proposed Modification				
PMSID 0849/Mod/SS22(ST27)/1			The University proposes that a 26ha site be allocated to the south of the Campus East lake and distant from A64, as proposed by the City Council in 2014. Because land up to A64 is also controlled by the University, a 30ha landscape buffer would be provided as part of the development to provide a backdrop to the campus extension and wider views into and out of the city. This buffer would be within the Green Belt and remain open. On this basis, the whole 26ha would be available for development. The 2018 evidence justifies the 26ha allocation in terms of academic need and economic benefit to the city and the region.	Oneill Associates (Janet O'Neill) OBO University of York
PMSID 0849/Mod/SS22(ST27)/2			On the basis that the plan is to confirm Green Belt boundaries for the first time, the Council's plan period is considered to be inadequate. Our view is that it needs to be 15 years from adoption plus 10 years. This would be 2021+15 years = 2036, plus 10 years = 2046. If this were to be the case then further expansion land for the University would need to be considered. The area within the control of the University is shown on plan 1.5 in appendix 1. This should be included as safeguarded land.	Oneill Associates (Janet O'Neill) OBO University of York

14. Alternative GB boundaries proposed through consultation

Policy SS23 (Site ST19) Land at Northminster Business Park

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0871/LC/SS23(ST19)/1	No		Allocation of site SS23 / ST19 overrides the Poppleton Neighbourhood Plan that was clear expansion of the Northminster Business Park beyond its 2017 boundary would not be supported. 91% of residents were in favour of the Neighbourhood Plan. Inclusion of this site does not meet 'exceptional circumstances' and is a violation of the 2011 Localism Act.	Councillor Anne Hook OBO Residents of Rural West York
Soundness				
PMSID 0871/S/SS23(ST19)/1		Not Sound	Expansion of Northminster Business Park is not an exceptional case and expansion would put at risk a larger section of the green belt between the A1237 and edge of Acomb. It is not justified as there is brownfield land in York that should be developed first. Nor is it positively prepared as development would further traffic down a narrow country lane that it was not designed to handle, causing significant congestion, noise and air pollution that would be to detriment of the health and quality of life of residents of Northfield Lane.	Councillor Anne Hook OBO Residents of Rural West York
Proposed Modification				
PMSID 0871/Mod/SS23(ST19)/ 1			Remove site SS23 / ST19 from table 2 on page 81 of TP1. (re-instate as green belt)	Councillor Anne Hook OBO Residents of Rural West York

14. Alternative GB boundaries proposed through consultation

Site H39

North of Church Lane Elvington

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0876-2/LC/H39/1	No		Not legally compliant and duty to cooperate: Annex 5 H39 - indicates 32 houses (which 2 years ago was 28!)Page 41 states YCC Exceptional circumstances existing “change the green belt to meet development needs ...which cannot be solely provided for in urban areas or villages or by other means”. Clearly “other means” would be addressed if H26 Dauby Lane was used that is a larger site and would provide a better mix of housing, is off the main road into the village so construction access would be easier; would develop an area of waste land which is unused/derelict/unsightly and would be a practical area in the village to develop causing least disruption on existing services/houses. Elvington villagers do not oppose H26 although YCC are under the impression there is opposition to “joining up the village/filling in this area between the school and the medical practice building”.Page 42 - Impact on the need to promote sustainable patterns of development: considering duty to cooperate: There is no mention that YCC has considered the flooding issues with the land at H39 to be legally compliant? Would YCC expect the “developer” to deal with flooding but who would be responsible in the years following development.	Joanne Kinder
PMSID 0905/LC/H39/2	No		No specific details provided	Graham Holme
Soundness				
PMSID 0084/S/H39/1		Not Sound	The arguments in A5 (p41) relating to H39 are not balanced or accurate. The prime emphasis is that there a willing landowner wishing to sell. The statement about access to services and transport are disingenuous due to traffic and concerns in Beckside. The statement relating to exceptional circumstances and the need the houses is not an excuse to change the rural nature of the village. Do not agree with the green belt purposes relating to Elvington re H39 (commenting on Purposes 1,3 and 4) and the detailed boundary issues statement that the recognisable and permanent features is manifestly untrue in relation to the western boundary. Positive preparation should also go a lot further in exploring the opportunities, constraints and impact of the massive development ST15. The Local Plan is not justified as it is not the most appropriate strategy when considering reasonable alternatives such as H26 rather than H39 as a development site. The Plan is not effective as there has been a failure to engage with the Parish Council. And not consistent with national policy that states planning should empower local people to shape their surroundings.	Tim Tozer
PMSID 0333/S/H39/1			In the 2018 CYC Preferred Sites Consultation it was stated that H26 provides a gap between the main village and the industrial/commercial areas to the north - this is erroneous and would be obvious on a site visit. Alternative site H26 is preferable to H39 for housing	Alison Stead
PMSID 0362/S/H39/1		Not Sound	Infrastructure needs, congestion, access, utilities, flood risk and loss of habitat for wildlife all are reasons why development of H39 is unacceptable. Consultation process has been a sham and needs to be investigated.	Dominic Stevens

14. Alternative GB boundaries proposed through consultation

Site H39 North of Church Lane Elvington

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0362/S/H39/2		Not Sound	Development will be detrimental to the environment and the village as a whole for reasons such as, infrastructure, road access and congestion, utilities, flooding and wildlife habitat, including bats whose nests are illegal to disturb.	Dominic Stevens
PMSID 0905/S/H39/2		Not Sound	An Inspector previously determined H39 serves green belt purposes - the extra traffic from 32 homes would impact on existing residents of Beckside. The housing density should reflect existing estate.	Graham Holme
Proposed Modification				
PMSID 0362/Mod/H39/1			Remove site H39 from the plan so it remains greenbelt. Consult with Elvington Parish Council properly and speak to local councillors.	Dominic Stevens

14. Alternative GB boundaries proposed through consultation

Site SP1 The Stables Elvington

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0073/LC/TP1Add/1	No		SP1: The Stables Elvington - draft allocation fails to comply with national green belt policy PPG2 and Travellers (policies B,C,D,E & F) and is contrary to government policy in response to taking sites out of green belt in response to previously submitted planning applications. It reverses the decision made by inspector re: 10/02082/FUL and CYC have ignored the requirement of this decision. Further CYC have not engaged directly with the local community.	Peter Heptinstall
Soundness				
PMSID 0073/S/SP1/1			SP1 proposals will be unsustainable due to commuting patterns associated with the use - minimising harm would result by using ST15 for the proposed use. By allowing encroachment into the green belt rather than provision on Elvington Airfield makes the Local Plan not 'fit for purpose'.	Peter Heptinstall
PMSID 0191-1/S/SP1/2		Not Sound	Council has refused planning applications and imposed significant Greenbelt related restrictions on nearby sites. Council has restricted development to site within area of Nature Conservation to "prevent loss of openness and encroachment" in an historic landscape that provided the city and outlying villages with its rural setting.	Martin Moorhouse
Proposed Modification				
PMSID 0073/Mod/SP1/2			Have SP1 remain as Green belt and allocate land for Travelling Showpeople elsewhere	Peter Heptinstall

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Soundness				
PMSID 0125-7/S/Alt/1		Not Sound	Object to the removal of alt site reference 165, Land off Westfield Lane, Wigginton. All relevant assessments undertaken so far have shown the site could deliver 35 dwellings in 2021/22 and then delivering a further 195 in following years to result in a total of 230 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.	Persimmon Homes (Jess Kiely)
PMSID 0125-4/S/Alt/2		Not Sound	Object to the removal of alt site reference 170, Land off Windmill Lane, York (Pond Field). 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.	Persimmon Homes (Jess Kiely)
PMSID 0125-2/S/Alt/3		Not Sound	Object to the removal of alt site reference 171, Common Lane, Lime Tree Farm. All relevant assessments undertaken so far have shown the site could deliver 35 dwellings in 2021/22 and then delivering a further 115 in following years to result in a total of 150 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.	Persimmon Homes (Jess Kiely)
PMSID 0125-6/S/Alt/4		Not Sound	Object to the removal of alt site 787, Stockton Lane (formerly part of ST7). All relevant assessments undertaken so far have shown the site could it deliver 35 new homes per annum in the monitoring year 2021/2022 onwards. Resulting in the delivery of all 100 homes from the site in the first five years post adoption of the Local Plan. 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.	Persimmon Homes (Jess Kiely)
PMSID 0125/S/Alt/4		Not Sound	Former H54 - Alt Site 179 - Object to the inclusion of this site within the Green belt. 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 housing need. Former H54 - Alt Site 179 - Suggest removing this site from the Green Belt as it 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 housing need.	Persimmon Homes (Jess Kiely)

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0125-5/S/Alt/5		Not Sound	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.	Persimmon Homes (Jess Kiely)
PMSID 0181/S/Alt/2		Not Sound	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	Gateley Plc York Limited (Andrew Piatt) OBO Gateway Developments
PMSID 0231/S/Alt/1			Disagrees strongly with the evaluation of Annex 4 for the McArthur Glen Outlet which should have been identified as a developed site to be washed over by Green Belt and subject to NPPF paragraph 89.	Fulford Parish Council (Rachel Robinson)
PMSID 0333/S/Alt/1			In the 2018 CYC Preferred Sites Consultation it was stated that H26 provides a gap between the main village and the industrial/commercial areas to the north - this is erroneous and would be obvious on a site visit. Alternative site H26 is preferable to H39 for housing	Alison Stead
PMSID 0339/S/Alt/1		Not Sound	Raise significant objections to the Councils assessment of the inner boundary of the city, with specific reference to land at New Lane, Huntington (ST11). Sites that are deliverable, sustainable and have no impact on the openness of the Green Belt or do not meet any of the purposes should not be included in the Green Belt. The Council may choose to allocate these sites, which given the housing needs would be logical, however equally the land could be retained as white land or safeguarded. Boundaries 30 and 31 are the main areas of objection as these effectively draw the boundary along the edge of existing development in an arbitrary manner rather than following the Councils methodology and guidance in the Framework.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0339/S/Alt/2			In regards to Manor Heath, Copmanthorpe (ST12) - despite clear guidance in section 5 of TP1 and a plan showing the areas of land not necessarily to be kept permanently open in Figure 7, this is used in setting the boundaries around Copmanthorpe. Guidance in the Framework on meeting sustainable aims, ensuring the boundaries last beyond the plan period and not including land that is not necessary to be kept permanently open are also ignored with paragraph 6.17 simply confirming that the boundaries are drawn around the existing built form to taking into account accommodating identified needs. The plan should rightly inset Copmanthorpe but not draw a boundary simply around the extremities of the settlement. This approach is contrary to national guidance but most importantly in conflict with the Councils own methodology.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0342/S/Alt/1		Not Sound	The boundary around Wheldrake taken from the 2005 Draft Local Plan in the Addendum to Topic Paper 1 is incorrect. Land to the north of North Lane (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 shows how these greenbelt boundaries were drawn up by a Planning Inspector on the back of a public inquiry.	Andy Bell
PMSID 0603/S/Alt/1		Not Sound	The Retreat site has its northern half within and part of an urban built up area. The site as a whole does not fulfil Green Belt purposes	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0867/Mod/Alt/1		Not Sound	With housing need incorrectly revised downwards the site H26 has been removed from the plan. Oppose deletion of this site, has previously been found suitable for development.	DPP (Mark Lane) OBO Yorvik Homes
PMSID 0909/S/Alt/1		Not Sound	The boundary around Wheldrake taken from the 2005 Draft Local Plan in the Addendum to Topic Paper 1 is incorrect. Land to the north of North Lane (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 shows how these greenbelt boundaries were drawn up by a Planning Inspector on the back of a public inquiry.	Sophie Bell
Proposed Modification				
PMSID 0091/Mod/Alt/1			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.	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/7			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)	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0091/Mod/Alt/9			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)	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/10			From the Officer's Report LPWG 23.01.18 the respondent wishes to have H28 reinstated for the revised potential revised figure (and boundary)	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/12			From the Officer's Report LPWG 23.01.18 the respondent wishes to have SS19/ST35 reinstated for the revised potential revised figure (and boundary)	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/13			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)	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0091/Mod/Alt/16			From the Officer's Report LPWG 23.01.18 the respondent wishes to have 964 reinstated for the revised potential revised figure (and boundary)	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)
PMSID 0118/Mod/Alt/1			Annex 3, page A3:374. Section 7 boundary 4. A more logical and defensible boundary would be Lakeside Way.	Historic England (Ian Smith)

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0118/Mod/Alt/2			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. Include an additional area which identifies 'areas which contribute to the wider landscape setting of the City. This should include all the land lying between the ring road and the outer edge of the Green Belt (with the exception of the land to the north of Haxby).	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/3			Annex 3, page A3:4. 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.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/4			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 Wyeville Garden Centre and the Northminster Business Park and the land lying to the west of the Wyeville Garden Centre and the Northminster Business Park.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/5			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.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/6			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.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/7			Annex 3, page A3:294. 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 sub station adjacent to Osbaldwick Link Road, and the land to the east of the A64	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/8			Annex 3, page A3:364. 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.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/9			Annex 3, page A3:368. Section 7 boundary 2. A more logical and defensible boundary would be the road that links the Park & Ride to the Sports Centre.	Historic England (Ian Smith)

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0118/Mod/Alt/10			Annex 3, page A3:371. Section 7 boundary 3. A more logical and defensible boundary would be the road that links the Park & Ride to the Sports Centre.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/11			Annex 3, page A3:377. Section 7 boundary 5. A more logical and defensible boundary would be Lakeside Way.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/12			Annex 3, page A3:380. Section 7 boundary 6. A more logical and defensible boundary would be Lakeside Way.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/13			Annex 3, page A3:382. Section 7 boundary 7. A more logical and defensible boundary would be Lakeside Way.	Historic England (Ian Smith)
PMSID 0118/Mod/Alt/14			Annex 3, page A3:386. Section 7 boundary 8. A more logical and defensible boundary would be Lakeside Way.	Historic England (Ian Smith)
PMSID 0122/Mod/Alt/2			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. (Alt Site 982)	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0122/Mod/Alt/4			Former H2a - 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.	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0141/Mod/Alt/1			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	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0182/Mod/Alt/1			Alt Site 942 - Land to the West of Chapelfield, 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.	Johnson Mowat (Mark Johnson) OBO KCS Development Ltd

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0210/ Mod/PM39/2			Exclude land at Southfields Road and Princess Road, Strensall, from the Green Belt and either allocate as residential development or safeguarded land on the Local Plan Proposal Map. Alt Site 971 - 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	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0210/Mod/Alt/2			Exclude land at Southfields Road and Princess Road, Strensall, from the Green Belt and either allocate as residential development or safeguarded land on the Local Plan Proposal Map. Alt Site 970 - 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	Lichfields (Nicholas Mills) OBO Wakeford Properties Limited
PMSID 0220/S/Alt/1		Not Sound	<p>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.</p> <p>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:</p> <p>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.</p> <p>The site is stated not perform an important role in preventing neighbouring towns merging.</p> <p>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).</p> <p>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.</p> <p>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:</p> <p>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.</p> <p>The site is stated not perform an important role in preventing neighbouring towns merging.</p> <p>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).</p> <p>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.</p>	O'Neill Associates (Philip Holmes)OBO Mr M Ibbotson

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0260/Mod/Alt/1			Fomer SF1 - Site 825 - In the 2014 Preferred Options Document this site was allocated as safeguarded land. This land is still available, wish to stress that just part of the site to the north of the railway lane could be allocated. This would mean re-drawing the green belt boundary but would be a permanent and clear border. Allocation for development would help meet York's true housing need.	Pegasus Group (Emma Ridley) OBO Level Developmentsts Ltd
PMSID 0339/Mod/Alt/1			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 excluded from the green belt, either as white land or allocated as safeguarded land for future development.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0339/Mod/Alt/2			Former ST12 - 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 ether be allocated, remain as white land or be allocated as safeguarded land.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0339/Mod/Alt/3			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 ether be allocated, remain as white land or be allocated as safeguarded land.	Barton Willmore (Chris Atkinson) OBO Barratt & David Wilson Homes
PMSID 0345/Mod/Alt/1			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.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0354-1/Mod/Alt/1			Alt Site 952 - 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. As a matter of principle therefore, the allocation of this site for housing must be preferred.	Peter Vernon Vernon & Co
PMSID 0376-2/Mod/Alt/4			Former ST12 - 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.	ELG Planning (Steven Longstaff) OBO Taylor Wimpey Ltd

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0581/Mod/Alt/1			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.	Avison Young (Gary Halman) OBO Barwood Strategic Land II LLP
PMSID 0587/Mod/Alt/1			Former H2b - Alt 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.	Oneill Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0589/Mod/Alt/2			Alt Site 957 - Malton Road Industrial Estate - 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.	Oneill Associates (Eamonn Keogh) OBO Malton Road Developments Ltd
PMSID 0592/Mod/Alt/2			The site would provide a consistent boundary to the northern edge of Dunnington and would not impact on the York Moraine or historic setting of the village. In terms of green belt issues and purposes 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. We also agree with officer's previous analysis that the allocation of land to the east of Church Balk will establish a consistent boundary at the northern edge of the village and development of the land at Church Balk would have no adverse impacts in relation to the need to preserve the setting and special historic character of York or Dunnington.	Oneill Associates (Graeme Holbeck) OBO Yorvik Homes
PMSID 0604/Mod/Alt/1			Green belt boundary has been poorly drawn around Acomb, the A1237 would make more a more permanent and defined boundary. SHLAA 2018 site reference 871 could be reinstated here. Redraw green belt boundary around Acomb to include SHLAA 2018 site reference 871.	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)
PMSID 0604/Mod/Alt/1			Alt Site 871 - Re-instate site for development to help meet the true housing need. At the very least include the site as safeguarded land.	Carter Jonas (Simon Grundy) OBO L & Q Estates (Formerly Gallagher Estates)

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0607/Mod/Alt/2			Remove land at The Brecks, Strensall (Site 49) from the 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.	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0620/Mod/Alt/2			Alt Site 891 - Galtres Garden Village. Green Belt boundaries are not defensible because insufficient land has been excluded from the Green Belt to meet development needs during and beyond the 16-year Plan period. Removal of this site from the Green Belt and allocation for development will enable the Council to define Green Belt 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 Councils 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.	Eamonn Keogh ONeill Associates OBO Galtres Village Development Company
PMSID 0866/Mod/Alt/2			Re-instate site H28 to help meet true housing need.	DPP (Mark Lane) OBO Mulgrave Properties
PMSID 0882/Mod/Alt/1			Remove H39 from the plan as an allocation for development and replace it with H26. Alternatively minimise disruption to existing villages by adding more housing to the large ST15 development.	Simon Willis
PMSID 0890/Mod/Alt/2			Allocate further sites for development and as safeguarded land. Include alt site 737 Stock Hill Field, West of Church Balk, Dunnington 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.	Johnson Mowatt (Mark Johnson) OBO Yorvik Homes
PMSID 0894/Mod/Alt/2			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.	Carter Jonas (Simon Grundy) OBO Karbon Homes

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0895/Mod/Alt/1			<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0901/Mod/Alt/1			<p>Edit policy ED5 to include the Mille Crux site (land to the east of Haxby Road, alt site 141) as an allocation for sports use. Omitting the site from Green Belt would not have a significant impact on the Green Wedge on Bootham Stray, as the natural boundary of this wedge runs along the western boundary of Northfields. The site could therefore be excluded from Green Belt land to the east without affecting the wider sense of the openness of the wedge. This would provide a more permanent boundary, with defined and recognisable physical features in accordance with NPPF paragraph 85. Doing so would ensure consistency with Local Plan objectives to support the use and development of the Sports Park.</p>	O'Neill Associates (Phillip Homes) OBO York St John University
PMSID 0905/Mod/Alt/2			<p>Reinstate H26 as a housing allocation and remove H39. Approx a third of housing in the village is west of the school, H26 would help satisfy the need and increase the housing stock providing a better mix to meet the clear need in the village. CYC continue to ignore wishes of the local community imposing H39 rather than H26.</p>	Graham Holme
PMSID 0916/Mod/Alt/1			<p>Alt Site 629 -The Retreat Heslington Road. Include plot 2a 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.</p>	Carter Jonas (Simon Grundy) OBO Schoen Clinic York Ltd/ The Retreat Living

14. Alternative GB boundaries proposed through consultation

Alternative Site/Boundary

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0916/Mod/Alt/1		Not Sound	The rear boundary of The Retreat adjacent to Walmgate Stray would form a logical, permanent and strong Green Belt boundary and a well-defined edge to the built-part of the city at this point. The site in itself serves none of the five purposes of Green Belt as set out at paragraph 80 of the National Planning Policy Framework (NPPF). Development could be undertaken in a sensitive manner to protect heritage assets including the conservation area, setting of listed buildings and the setting of the land within the Register of Parks and Gardens. Additional protection via green belt policy is not required.	Carter Jonas (Simon Grundy) OBO Schoen Clinic York Ltd/ The Retreat Living
PMSID 0918-1/Mod/Alt/1			The inclusion of sustainable sites such as land to the north of Avon Drive	Robert Pilcher
PMSID 0918-1/Mod/Alt/2			The inclusion of sustainable sites such as H28 Wheldrake.	Robert Pilcher

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
Legal Compliance				
PMSID 0001/LC/Gen/1	Yes		Inadequate supply of housing over initial 5 year period.	David Marsh
PMSID 0023/LC/Gen/1	Yes		Consider LP to comply legally and with the duty to cooperate	Kevin Graham Ogilvy
PMSID 0052/LC/Gen/1	Yes		As a lay person I trust that CYC have covered this objective.	Pauline Bramley
PMSID 0053/LC/Gen/1	Yes		Modified Plan has been prepared in line with statutory regulations, the duty to cooperate and legal procedural requirements	Peter Whitfield
PMSID 0060/LC/Gen/1			Local Plan underestimates need of Gypsies and Travellers and is not therefore legally compliant with 2010 Equality Act. On the basis that the proposed Green Belt boundary does not allow for any of the development needs of Gypsies & Travellers, it is difficult to see how a decision to adopt the York Local Plan on the basis of the current draft would be compatible with the Public Sector Equality Duty under s.149 of the Act.	Michael Hargreaves Planning OBO York Travellers Trust
PMSID 0073/LC/Gen/1	No		Development of SP1: The Stables Elvington does not promote sustainable growth for York when better alternative sites are available	Peter Heptinstall
PMSID 0075/LC/Gen/1	No		ST15 and indicative infrastructure is wholly within HeslingtonParish. The site name “Land West of Elvington Lane” is misleading thereby decreasing the possibility of Heslington residents being aware and the likelihood of their responding.	Heslington Parish Council
PMSID 0075/LC/Gen/2	No		Tillmire SSSI is variably spelt in the Plan creating barriers to digital search of the document for relevant information	Heslington Parish Council
PMSID 0075/LC/Gen/3	No		The evidence for preference for a large green belt site withnew infrastructure versus several smaller developments closer to existing settlements is not set out.	Heslington Parish Council
PMSID 0099/LC/Gen/1	Yes		Consider the plan to the legally complied and to comply with the Duty to Cooperate	Strensall with Towthorpe PC (Fiona Hill)

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0122/LC/Gen/1	Yes		Statement of Community Involvement commits to producing a report that provides feedback and responds to issues raised during consultation. No such report has been produced for regulation 19 / publication draft local plan. Statement of Community Involvement has not been kept up to date in line with national guidance.	Turnberry (Chris Pattison) OBO York Racecourse
PMSID 0145/LC/Gen/1			Council ignored 2011 ruling by Planning Inspector, Phillip Major, who permitted only 5 years temporary use of the proposed Travelling Showpersons site (allocation SP1).	Ken Guest
PMSID 0145/LC/Gen/2			Council ignored every aspect of NPP in relation to TSP plots, including that 'mixed use' plots should not be permitted as Rural Exception/Inset sites and should be restricted solely to brown field locations.	Ken Guest
PMSID 0171/LC/Gen/1	Yes		Modified Plan has been prepared in line with statutory regulations, the duty to cooperate and legal procedural requirements	Megan Taylor
PMSID 0172/LC/Gen/1	Yes		The Plan is legally compliant and complies with the Duty to Cooperate	CLlr Stephen Fenton
PMSID 0214/LC/Gen/1	No		With regard to the duty to co-operate it may be the case the Council has consulted with neighbouring authorities, but some of those authorities have expressed concerns that have not been fully resolved. 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.	ONEILL Associates (Eamonn Keogh) OBO Wendy & Richard Robinson
PMSID 0222/LC/Gen/1	No		CYC takes no notice of what people say who live in Elvington. CYC has never taken into account of numerous responses provided by villagers and has never consulted villagers or Parish Council about what they want.	Joanne Wedgwood
PMSID 0227/LC/Gen/1	No		CYC has never visited Elvington, never asked Elvington Parish council or Keep Elvington Rural or other residents what they wanted. CYC proposes what it wants, ask for comments, ignores the comments and proposes the same thing again.	Matthew Wedgwood
PMSID 0261/LC/Gen/1	No		Do not believe the Plan to be legally compliant and fails to co-operate as the village nor the parish council has been consulted on its requirements or proposals to remove land in Elvington from the green belt.	Amanda Moore
PMSID 0286/LC/Gen/1	Yes		No comment provided	John Martin Pickard
PMSID 0287/LC/Gen/1	Yes		No comment provided	Katherine Pickard

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0291/LC/Gen/1	Yes		The modified plan has been prepared in line with statutory regulations, the duty to cooperate and legal procedural requirements.	Derek Brown
PMSID 0338/LC/Gen/1	Yes		It has been prepared with due diligence	Alan Cook
PMSID 0342/LC/Gen/1	No		The Local Plan is not legally compliant as it does the complete opposite to the Yorkshire & Humberside RSS Revocation order and the saved policies by redefining already detailed green belt boundaries at and beyond the outer green belt boundary by using weak exceptional circumstances. It does not comply with either the 2012 or 2019 NPPF where it proposes development that is not limited infilling in villages. many people have not received CD013Q - Annex 16 City Wide Leaflet. Also at least one of the boundaries is wrong.	Andy Bell
PMSID 0345/LC/Gen/1	Yes			Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0347/LC/Gen/1	Yes		No specific details provided	Planning Prospects (Jason Tait) OBO Miller Homes
PMSID 0365/LC/Gen/1	Yes		No specific details provided	Rachael Maskell MP for York Central
PMSID 0369/LC/Gen/1	Yes		Consider the plan to be legally compliant and comply with the Duty to Cooperate	Julian Sturdy MP for York Outer
PMSID 0378/LC/Gen/1	Yes		No specific details provided	Quod (Tim Waring) OBO Langwith Development Group

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0381/LC/Gen/1	Yes		YWT considers that the inclusion of Moor Lane as the edge of the urban settlement is a logical approach. The Green Belt at this point maintains openness and the rural setting of York, prevents coalescence of urban areas and protects the Trust's reserve at Askham Bog from urban impacts.YWT considers that the inclusion of Moor Lane as the edge of the urban settlement is a logical approach. The Green Belt at this point maintains openness and the rural setting of York, prevents coalescence of urban areas and protects the Trust's reserve at Askham Bog from urban impacts.	Yorkshire Wildlife Trust (Sara Robin)
PMSID 0394/LC/Gen/1	Yes		No specific details provided	PB Planning (Paul Butler) OBO McCarthy & Stone
PMSID 0420-3/LC/Gen/1	No		No specific details provided	Jane Moorhouse
PMSID 0420-2/LC/Gen/2	No		Elvington residents comments have been totally ignored on each consultation	Jane Moorhouse
PMSID 0420 -1/LC/Gen/2	No		The whole Plan process has been devised to not allow residents their say about their little rural villages on the outskirts of York being over developed. Allowing allocations York doesn't want	Jane Moorhouse
PMSID 0587/LC/Gen/1	No		With regard to the duty to co-operate it may be the case the Council has consulted with neighbouring authorities, but some of those authorities have expressed concerns that have not been fully resolved. 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.	ONEILL Associates (Eamonn Keogh)OBO Shepherd Homes Land at Cherry Lane
PMSID 0589/LC/Gen/1	No		With regard to the duty to co-operate it may be the case the Council has consulted with neighbouring authorities, but some of those authorities have expressed concerns that have not been fully resolved. 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.	ONEILL Associates (Eamonn Keogh) OBO Malton Road Developments Ltd

15. Summary of General Comments

General Comments

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0590/LC/Gen/1	No		CYC have consulted with neighbouring authorities but some have expressed concerns not fully resolved. Report to CYC Exec on 25th Jan 2019 stated Hambleton Council - 'the proposed detailed boundaries of the Green Belt offer little opportunity to accommodate the increased level of growth proposed. If CYC does not ensure that its longer term development needs are met this will place pressure on area in neighbouring authorities'. Leeds City Region LEP - 'York has not applied the 10% market signals adjustment as recommended in the 2017 SHMA'. Ryedale and Harrogate Councils - discussions ongoing. Selby District Council - noted that the SHMA Addendum figure does not take account of the level of employment growth proposed in the Local Plan..Selby DC is concerned that any increases to this figure could raise significant cross-boundary issues. Selby DC requested additional information re: ST15 and ST27 before providing further comment on potential impact on Selby. Have 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.	York and North Yorkshire Chamber of Commerce (Susie Cawood)
PMSID 0601/LC/Gen/1	Yes		No specific details provided	DPP Planning (Claire Linley) OBO PJ Procter
PMSID 0603/LC/Gen/1	Yes		No comment provided	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0620/LC/Gen/1	No		With regard to the duty to co-operate it may be the case the Council has consulted with neighbouring authorities, but some of those authorities have expressed concerns that have not been fully resolved. 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.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company
PMSID 0620/LC/Gen/2	No		The duty to co-operate has not been complied with because 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.	Eamonn Keogh ONEill Associates OBO Galtres Village Development Company

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0621/LC/Gen/1	Yes		no comments made	PB Planning (Paul Butler) OBO Barratt Homes & David Wilson Homes and TW Fields
PMSID 0651/LC/Gen/1	Yes		The modifications have been prepared in line with statutory regulations, the Duty to Cooperate and legal procedural requirements.	David Carr
PMSID 0651/LC/Gen/1	Yes		The modifications have been prepared in line with statutory regulations, the Duty to Cooperate and legal procedural requirements.	David Carr
PMSID 0826-1/LC/Gen/1	No		Absence of safeguarded land. Previous counsel sought by CYC advised that safeguarded land would be a sensible strategy by which to create a green belt that would have a sense of permanence by enduring significantly longer than the plan period. The omission of safeguarded land from the plan is clear evidence that the new Local Plan has not been positively prepared.	Thomas Pilcher Homes (Thomas Pilcher)
PMSID 0833/LC/Gen/1	No		No specific details provided	George E Wright
PMSID 0841/LC/Gen/1	No		No specific details provided	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0855/LC/Gen/1	Yes		Agree they are compliant	Graham Lishman
PMSID 0856/LC/Gen/1	Yes		Ambiguity with reference to the use of land to the East of terry's and failure to identify key infrastructure needs	John Young
PMSID 0857/LC/Gen/1	Yes		Trusts that LC and DtC has been followed	Susan Goodhead
PMSID 0865/LC/Gen/1	No		No comment provided	Catherine Blacketer
PMSID 0866/LC/Gen/1	Yes		No specific details provided	DPP (Mark Lane) OBO Mulgrave Properties

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0868/LC/Gen/1	Yes		Satisfied the Local Plan meets all duty to cooperate requirements	West Yorkshire Combined Authority (Alan Reiss)
PMSID 0868/LC/Gen/2	Yes		Confirmed the Local Plan and the Proposed Modifications are in general conformity with the Leeds City Region SEP and the principles of the West Yorkshire Transport Strategy.	West Yorkshire Combined Authority (Alan Reiss)
PMSID 0874/LC/Gen/1	No		Inadequate consultation with Parish Council. Modifications are not considered minor. Proposed development does not coincide with needs of the village which will be severely affected	Bryan Boulter
PMSID 0878/LC/Gen/1	Yes		It would appear that attempts have been made to work with other local planning authorities and organisations beyond their own administrative boundaries. For example, housing market areas, travel to work areas, river catchments and ecological networks appear to be represented to plan for housing, transport, infrastructure, flood risk management, climate change mitigation/adaptation, and biodiversity to some extent.	Sarah Mills
PMSID 0879/LC/Gen/1	No		The plan appears to be legally compliant. The submission form provides no information on the scope or rationale of 'Duty to Cooperate'; reading on the internet this appears to be the need to cooperate with organisations, given that I am not an organisation then I do not feel it meets the criteria stated.	Pat Mills
PMSID 0880/LC/Gen/1	No		We have not been consulted	Edmund Kinder
PMSID 0881/LC/Gen/1	Yes		Agrees that Local Plan is legally compliant and complies with Duty to Cooperate	Cordula Van Wyhe
PMSID 0889/LC/Gen/1	Yes		No specific details provided	Litchfields (Suzanne Yates) OBO Oakgate Group Ltd
PMSID 0892/LC/Gen/1	Yes		No specific details provided	Josephine Tomlin
PMSID 0893/LC/Gen/1	Yes		No specific details provided	Heather Harris
PMSID 0904/LC/Gen/1	Yes		No specific details provided	Anneliese Emmans Dean

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0909/LC/Gen/1	No		The Local Plan is not legally compliant as it does the complete opposite to the Yorkshire & Humberside RSS Revocation order and the saved policies by redefining already detailed green belt boundaries at and beyond the outer green belt boundary by using weak exceptional circumstances. It does not comply with either the 2012 or 2019 NPPF where it proposes development that is not limited infilling in villages. many people have not received CD013Q - Annex 16 City Wide Leaflet. Also at least one of the boundaries is wrong.	Sophie Bell
PMSID 0910-3/LC/Gen/1	No		Refer to soundness for further comments	Chris Hawkswell
PMSID 0910-2/LC/Gen/1	No		Not listening to the views of the local people	Chris Hawkswell
PMSID 0912/LC/Gen/1	No		Legal compliance is to make sure that corporations act responsibly. Refer to soundness for further comments	Stephen Hawkswell
PMSID 0913/LC/Gen/1	No		Doesn't consider the plan legally compliant.	Sally Hawkswell
PMSID 0914/LC/Gen/1	Yes		Satisfied the Local Plan meets all duty to cooperate requirements	Leeds City Region LEP (James Whiteley)
PMSID 0914/LC/Gen/2	Yes		Confirmed the Local Plan and the Proposed Modifications are in general conformity with the Leeds City Region SEP and the principles of the West Yorkshire Transport Strategy.	Leeds City Region LEP (James Whiteley)
PMSID 0918-2/LC/Gen/1	No		Local politics and no desire to comply with national policy and evidence. Respondent believes that Council wishes to expedite the adoption of the Local Plan to then exercise discretionary choice of green belt development through strategic sites. Intransigence to change by Council and the people of York has lead to disproportionately high housing prices which has affected local building businesses that have closed or are struggling to survive. Brownfield land is already in control of major PLCs and therefore being able to restrict the housing supply in order to drive up prices, have no incentive to sell to smaller builders. Political influence coupled with NIMBY interests of constituents has prevented small and medium developments within the ring road and therefore satellite dormitory towns are now being proposed as a means of alleviating housing shortage.	Robert Pilcher

Soundness

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0001/S/Gen/1		Not Sound	Plan is not consistent as it does not provide adequate affordable homes.	David Marsh
PMSID 0053/S/Gen/1		Sound	Respondent considers Plan as sound.	Peter Whitfield
PMSID 0060/S/Gen/1		Not Sound	Experience suggests that the plan is unlikely to be adopted before 2020/21; on that basis the area excluded from the Green Belt should only provide 17 years development capacity to 2037/38. That is significantly short of permanence and enduring beyond the Plan period. Such a Green Belt boundary is highly unlikely to 'promote sustainable patterns of development'.	Michael Hargreaves Planning OBO York Travellers Trust
PMSID 0060/S/Gen/2		Not Sound	Policy H5 - the failure to identify sites for existing and future needs is a consequence of the problems with Policy H5; the Council's approach involves a significant element of wishful thinking that somehow sites will emerge through the requirements of Policy H5 without the Council having the identify them.	Michael Hargreaves Planning OBO York Travellers Trust
PMSID 0060/S/Gen/3		Not Sound	The Plan's policies will not meet the needs of York's long established Gypsy community. They are likely to be indirectly discriminatory and contrary to the Public Sector Equality Duty. They are at risk of failing the four soundness tests.	Michael Hargreaves Planning OBO York Travellers Trust
PMSID 0075/S/Gen/1		Not Sound	No commitment to introduce adequate control measures arising from the combined cumulative effects of local development proposals. Additionally, there are traffic implications for York on already overloaded local roads. Fulford Road and Hull Roads are already highly congested and the A64 often gridlocked.	Heslington Parish Council
PMSID 0083/S/Gen/1		Not Sound	It does not take a positive approach to community building but seeks to impose housing numbers with little regard to the effect upon the village of Elvington. Is not justified in terms of the most appropriate strategy taking into account alternatives (e.g. H26 rather than H3. Is not effective in producing the most acceptable and sustainable solutions e.g. the massive developments at ST15 need to have more assessment and planning especially for transport and traffic. Goes against national policy in terms of engagement with the communities affect and fails to recognise the different roles and character of villages.	Rosemary Tozer
PMSID 0091/S/Gen/1		Not Sound	The plan is not consistent with national policy that aims for 'the delivery of sustainable development in accordance with the framework'. The Plan is inconsistent with Para 17, 47 and 182 of the NPPF and it is demonstrably the case that the PMs do not comply with national policy and fails the test of soundness	Strathmore Estates (Debbie Hume) OBO Westfield Lodge and Yaldara Ltd (H37)

15. Summary of General Comments

General Comments				
Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0092/S/Gen/1		Not Sound	Elvington Parish Council have never been consulted in any stage of this Local Plan. Elvington should remain a village. (Villagers) have no desire or need for a large increase in houses and there is no infrastructure to support it. The development would risk and threaten the Green Belt in the future. Village is not against a reasonable increase in housing and have suggested joining the two halves of the village yet CYC seems against this suggestion	Jonathan Shaw
PMSID 0099/S/Gen/1		Sound	Consider the plan to be sound	Strensall with Towthorpe PC (Fiona Hill)
PMSID 0102/S/Gen/1		Not Sound	The Local Plan is unsound and does not reflect local public need or opinion. The Plan should be rejected by the Inspectors.	Elvington Parish Council (David Headlam)
PMSID 0102/S/Gen/2			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 Parish Council (David Headlam)
PMSID 0118/S/Gen/1		Sound	No comments to make regarding the proposed changes	Historic England (Ian Smith)
PMSID 0141/S/Gen/1		Not Sound	The largest proposed allocation, by far, is York Central accounting for over 40% of all allocated employment land. We maintain that the Local Plan is over reliant on this single site, which has significant constraints, in terms of deliverability, but also the limited type of office floorspace it can deliver to the market. The Proposed Modifications fail to reflect the latest position at York Central and continue to overstate the amount of office space that can be delivered.	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0141/S/Gen/1				Avison Young (Andrew Johnson) OBO Oakgate

15. Summary of General Comments

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0141/S/Gen/2		Not Sound	Majority of the office space to be delivered at York Central is in the later phases of development and the March 2019 planning permission for York Central only has between 70,000sqm & 87,693sqm of office space, this is in contrast to the Draft Local Plan which allocates 100,000 sqm of office space at York Central. This means there is at least a 12,000sqm shortfall of office space and potentially 30,000 sqm. There are no other allocations included in the draft Local Plan that include a specific requirement for office floor space. This means, combined with the shortfall at York Central, there is potentially 37,000 sqm of office floor space unaccounted for in the draft Local Plan.	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0141/S/Gen/3			Policy EC1 has not been justified, is unlikely to be effective, does not represent positive planning and is not consistent with the NPPF. Employment allocations should identify a mix sites to reflect the needs of different markets and occupiers (who will have differing locational drivers). York Central will be a desirable location for some office occupiers, but it will not suit the needs of those sectors with a higher dependency on occupiers who need quick access to the road network (either for commuting or for business reasons). Other types of occupiers may also prefer a campus style business park environment to a city centre location for reasons of security or privacy, for example headquarters of large businesses, defence organisations and data centres, which the Naburn Business Park (alt site 873) is designed to the meet the needs of.	Avison Young (Andrew Johnson) OBO Oakgate
PMSID 0145/S/Gen/1		Not Sound	With in excess of 100 hectares of brown field land for redevelopment, how can Council justify removing land from the Green Belt in order to accommodate TSP plots?	Ken Guest
PMSID 0145/S/Gen/2		Not Sound	Council has disregarded numerous (hundreds) of objections including local residents, local Councillor, Parish Council, Keep Elvington Rural and MP.	Ken Guest
PMSID 0145/S/Gen/3		Not Sound	Respondent believes removing The Stables paddock from the Green Belt by Council in response to numerous planning applications is against the NPP	Ken Guest
PMSID 0145/S/Gen/4		Not Sound	Resident TSP have continuously breached their conditions of residency and do not 'travel' anywhere, which over-rides Council's stated commitment to protect the Green Belt against inappropriate development..	Ken Guest
PMSID 0150/S/Gen/1		Not Sound	Respondent's observations are that there has been a wall of silence. Has not received a response to repeated question as to whether all the possible brown field sites have been assessed before taking land out of the Green Belt.	Simon Lock
PMSID 0171/S/Gen/1		Sound	Respondent considers Plan as sound.	Megan Taylor
PMSID 0193/S/Gen/1		Not Sound	The Parish Council has not been consulted about what the village needs, nor has been consulted on proposed fundamental changes to the Green Belt in the parish.	Peter Murray

15. Summary of General Comments

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PMSID 0194/S/Gen/1		Not Sound	The Parish Council has not been consulted about what the village needs, nor has been consulted on proposed fundamental changes to the Green Belt in the parish.	Jessica Murray
PMSID 0195/S/Gen/1		Not Sound	The Parish Council has not been consulted about what the village needs, nor has been consulted on proposed fundamental changes to the Green Belt in the parish.	Natasha Murray
PMSID 0197/S/Gen/1		Not Sound	The Parish Council has not been consulted about changes to the Green Belt	Mary Julie Murray
PMSID 0218/S/Gen/1			Submits further evidence to show that Poppleton Glassworks (alt site 955, reference SE55-05YK) does not meet the criteria to qualify as a SINC - the site lacks sufficient qualifying grassland species. The Poppleton Glassworks site does not qualify as a SINC and should be removed as such from the Local Plan as there has been no consideration by the Council of the up to date evidence submitted by JLL and is not consistent with national policy.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund
PMSID 0222/S/Gen/1		Not Sound	Although not objecting to some development, the respondent feels the methodology behind the plan is lacking as Elvington village residents have never been asked what they wanted, but instead have only been asked to comment on CYC's proposals. Because no one from CYC has visited the village to listen to what development the villagers want, the Local Plan feels imposed and therefore doesn't meet local requirements.	Joanne Wedgwood
PMSID 0222/S/Gen/2			Illogical that Knapton or Murton are considered to contribute to Green Belt whereas CYC says that Elvington does not.	Joanne Wedgwood
PMSID 0222/S/Gen/4		Not Sound	Elvington remains one of the few villages around York that remains a small separate village in a rural setting. There is no valid need for the development to be so close. Residents chose the village for the lack of urban sprawl and its old village character. There is not a single good reason for the development to be so close.	Joanne Wedgwood
PMSID 0227/S/Gen/1		Not Sound	Lack of consultation with the village, ignoring previous responses, inconsistency vs. other villages. The whole of Elvington (parish) should be officially recognised as contributing to the greenbelt. Any residential development in Elvington village must provide better mix. Shortage of large family homes and starter homes.	Matthew Wedgwood
PMSID 0227/S/Gen/4		Not Sound	Elvington remains one of the few villages around York that remains a small separate village in a rural setting. There is no valid need for the development to be so close. Residents chose the village for the lack of urban sprawl and its old village character. There is not a single good reason for the development to be so close.	Matthew Wedgwood

15. Summary of General Comments

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0261/S/Gen/1		Not Sound	Elvington should remain within the green belt as it is a rural village with limited amenities with open spaces and wildlife. ST15 should be revisited as the scale of the proposal would be detrimental to the whole rural element of Elvington village and cause unnecessary volumes of traffic.	Amanda Moore
PMSID 0301/S/Gen/1		Sound	The modified Plan is considered to be sound.	Copmanthorpe Parish Council (Robert West)
PMSID 0345/S/Gen/1			<p>Issues raised in relation to housing need supply side evidence, without which the Inspector will be unable to judge whether the Plan will give York a 5 year supply of deliverable housing sites on adoption, whether the Plan's sites are deliverable or developable and whether the Plan will enable CYC to maintain a policy compliant level of supply through the Plan period.1. Plan period is described as 2017-2033 but key parts of evidence base and housing trajectory indicate 2012-2033; 2. Plan does not contain a summary of housing need/delivery position at the Plan base date; 3. Supply data (SHLAA) is out of date and unreliable;</p> <p>4. Question inclusion in supply figures of student housing schemes, expired consents/REMs and ORCs which have not yet been delivered. These should have supporting evidence of deliverability. Published evidence in respect of the suitability, availability and achievability of proposed housing allocations is wholly inadequate.</p>	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0345/S/Gen/3			Safeguarded Land. We consider CYC's approach to be flawed and the Plan unsound. If the Plan does not, in Green Belt terms, look more that 5 years beyond the Plan period, it is very likely that the Green Belt boundary will have to be modified again when the Plan is next reviewed and in the light of the way in which the NPP now operates, the Plan will almost certainly have to be reviewed in the very near future. CYC needs to set out its growth strategy for a period of at least 10 years beyond the Plan period, and make adequate provision for this in terms of boundary specification, allocations and safeguarded land.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0350-2/S/Gen/1		Not Sound	SHMA is flawed and there is an inherent conflict in attempting to use up-to-date data but not the most recent national policy and guidance.	Carter Jonas (Simon Grundy) OBO Picton Capital
PMSID 0357/S/Gen/1		Not Sound	The impact of a lower OAN is a concern specifically on meeting the housing needs of older people. Whilst Policy H9 supports meeting the needs of Older Persons Specialist Housing only one allocation (H6) provided this type of use. The SHMA identifies a need for 84 specialist units pa (sheltered or extra care) and potential need for a further 37 bed spaces pa for people ages >75. A reduction in OAN will have a consequential impact. The Government recently published PPG relating to housing for older and disabled people stresses establishing policies to address this specific need. CYC have included a policy with the onus on the market to provide this type of housing. (Paragraph 012 clearly states that plans need to provide for specialist housing for older people where a need exists.	ID Planning (Richard Irving) OBO Green Developments

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0360/S/Gen/1			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.	North Yorkshire County Council - NYCC - (David Bowes)
PMSID 0360/S/Gen/2			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.	North Yorkshire County Council - NYCC - (David Bowes)
PMSID 0364/S/Gen/1		Not Sound	The plan fails to deliver on the overriding objective of prosperity for all. It lacks any analysis of how different groups in the community are affected by the proposals. It fails to heal the highly unequal conditions of, or deliver opportunities for, all the residents of York. The plan also fails to follow up on the implications of sustainability. It chooses employment and housing options without referencing how they impact on community or environmental sustainability. There is no credible and comprehensive transport strategy to address existing transport and access problems, leaving aside those arising from the proposed new developments.	York Labour Party (Dave Merrett)
PMSID 0364/S/Gen/2		Not Sound	The Transport Section's policies are not grounded in any comprehensive analysis of the challenges facing York now, or over the lifetime of the Plan. It relies on an out of date Local Transport Plan and an incomplete Transport Topic paper which only focused on motorized transport. Planned developments and normal traffic growth are projected to result in a 30% general increase in travel time across the network and a staggering 55% increase in peak delay. This will severely impact on residents, businesses and the economy. It will further contribute to air quality problems and will exceed EU emission limits. It is unacceptable. The Council has not responded to any of our points.	York Labour Party (Dave Merrett)
PMSID 0364/S/Gen/3		Not Sound	The only way to achieve genuine sustainability is to cluster new developments. Clusters can work (1) around existing facilities that can take expansion or (2) when new developments are built on a scale that means new facilities and transport linkages can be provided. The plan fails in both ways because it supports over-development in the urban core where balanced and sustainable provision is not possible. Developments proposed on the periphery are too small and will not sustain an appropriate range of new facilities. This is true about community facilities, including green space, and transport equally.	York Labour Party (Dave Merrett)
PMSID 0364/S/Gen/4			We referred at length in our response last year that there were insufficient land allocations to employment uses of all kinds. It is symptomatic of this plan that an adjustment is made to the employment allocation of one site without reference to the whole. The plan is silent on the employment needs of the city, has not responded to our previous comments and makes the adjustments to this site in isolation to the wide picture.	York Labour Party (Dave Merrett)

15. Summary of General Comments

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PMSID 0365/S/Gen/1		Not Sound	Housing planning cannot be developed in isolation from a skills analysis. Currently the skills our city requires is out of balance with those available. Part of this has resulted from poor housing planning and the lack of affordable and social housing. A full skills analysis must be undertaken to understand the future housing needs of the city.	Rachael Maskell MP for York Central
PMSID 0365-1/S/Gen/2		Not Sound	There is a high volume of people who are currently displaced and in housing need, from overcrowding to people living in unsuitable housing or who are homeless. There needs to be provision, as a priority to meet local unmet need.	Rachael Maskell MP for York Central
PMSID 0886/S/Gen/3			The only way to achieve genuine sustainability is to cluster new developments. Clusters can work (1) around existing facilities that can take expansion or (2) when new developments are built on a scale that means new facilities and transport linkages can be provided. The plan fails in both ways because it supports over-development in the urban core where balanced and sustainable provision is not possible. Developments proposed on the periphery are too small and will not sustain an appropriate range of new facilities. This is true about community facilities, including green space, and transport equally.	Rachael Maskell MP for York Central
PMSID 0365-1/S/Gen/3			Old data was used in the development of the local plan. This needs to be reviewed in the light of the Council and Government's new priority to create a Carbon Neutral City. The current plans do not sustain this objective. This requires an ambitious analysis of how public transport and active travel can lead the local transport infrastructure and operations.	Rachael Maskell MP for York Central
PMSID 0365-1/S/Gen/4			In order to support a growing population, there needs to be an analysis of the public services which need to expand to support these ambitions. Already our health service is overstretched, including in Primary Care, and schools are full, therefore there needs to be a future needs analysis for York.	Rachael Maskell MP for York Central
PMSID 0372/S/Gen/2		Sound	Respondent considers that the Local Plan and its evidence is now at a sufficient position to allow for the examination to proceed towards hearings.	Gladman Developments (Craig Barnes) OBO Gladman Developments
PMSID 0381/S/Gen/1		Sound	YWT considers that the inclusion of Moor Lane as the edge of the urban settlement is a logical approach. The Green Belt at this point maintains openness and the rural setting of York, prevents coalescence of urban areas and protects the Trust's reserve at Askham Bog from urban impacts.	Yorkshire Wildlife Trust (Sara Robin)

15. Summary of General Comments

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Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0389/S/Gen/1			Elvington Area - The Parish Council have never been consulted in any stage of this Local Plan. Elvington should remain as a village - we neither want or need a large increase in housing nor is there an infrastructure to support it. This technicality of an 'inset into the green belt' would put this at risk and threaten it in future. We have repeatedly suggested extra dwellings in the middle of the village opposite the medical centre in order to join the two distinct halves of the village.	Sandra Atkinson
PMSID 0590/S/Gen/1		Not Sound	We believe that the current draft local plan lacks the ambition necessary to support the proposed growth (in employment and housing terms including affordable housing) We therefore object to the proposed modifications.	York and North Yorkshire Chamber of Commerce (Susie Cawood)
PMSID 0603/S/Gen/1		Not Sound	Respondent does not believe the plan to be positively prepared, justified, effective or consistent with National Policy.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0607/S/Gen/1		Not Sound	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	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd
PMSID 0616/S/Gen/1		Sound	No specific comments to make.	The Coal Authority
PMSID 0620/S/Gen/1		Not Sound	Two years have elapsed since the start of the plan period and in the absence of an adopted plan, there has been little if any development activity on any of the strategic and large housing sites. Optimistically, the plan will not be adopted until mid or late 2020. Realistically, probably not until early to mid-2021. At that point, 4 years of the plan period will have elapsed with no housing development of any significance on the strategic sites, leaving only 12 years of the period remaining. To meet the housing needs of the City the plan period should be moved forward so that the development needs of the City can be properly accommodated.	Eamonn Keogh ONeill Associates OBO Galtres Village Development Company
PMSID 0651/S/Gen/1		Sound	The modified Plan is considered to be sound.	David Carr
PMSID 0826-1/S/Gen/1		Not Sound	Local plan does not have safeguarded land	Thomas Pilcher Homes (Thomas Pilcher)

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PMSID 0826-1/S/Gen/2		Not Sound	The absence of safeguarded land shall require constant amendments to the green belt boundaries and local plan amendments	Thomas Pilcher Homes (Thomas Pilcher)
PMSID 0827-1/S/Gen/1		Not Sound	The inner Green Belt boundaries are too restrictive, do not include safeguarded land, and will not allow the Green Belt to endure well beyond the plan period.	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0827-1/S/Gen/2		Not Sound	Not justified by the evidence presented on Figure 7 TP1 Addendum	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0827-1/S/Gen/3		Not Sound	Local Plan cannot deliver an enduring green belt	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0827-1/S/Gen/4		Not Sound	Contents and intent of John Hobson's QC counsel has been disregarded	Pilcher Homes Ltd (Robert Pilcher)
PMSID 0833/S/Gen/1		Not Sound	Safeguarded land - The Consultation does not invite comment upon the issue of 'Safeguarded Land' despite the further submissions on this topic by the LPA since the deposit of the Plan. Further clarification of the LPA's views would justify a right of reply on behalf of respondents who raised objection on this issue.	George E Wright
PMSID 0841/S/Gen/1		Not Sound	Safeguarded Land - this consultation does not seek representations on this issue, there is no clear justification for this. Safeguarded land is intended to provide options for growth and flexibility. By proposing safeguarded land in an earlier iteration of the Plan CYC have acknowledged those areas do not perform a green belt function.	Jennifer Hubbard Planning Consultant (Jennifer Hubbard)
PMSID 0850/S/Gen/1		Sound	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.	Highways England (Simon Jones)
PMSID 0855/S/Gen/1		Not Sound	The plan is essentially sound, but grammatical errors give an impression inconsistent with 'positive preparation'	Graham Lishman
PMSID 0857/S/Gen/1		Sound	Obvious that feedback from residents and ecologists has been carefully considered	Susan Goodhead
PMSID 0868/S/Gen/1		Sound	Satisfied that the Local Plan is sound	West Yorkshire Combined Authority (Alan Reiss)

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PMSID 0869-1/S/Gen/1		Not Sound	In Policy H2 - Density of Residential Developments the phrase; "will be expected to achieve the following net densities" is ambiguous and allows developers to submit planning applications that exceed stated H2 figures.	Ray Calpin
PMSID 0870/S/Gen/1		Not Sound	Plan completed without thorough consultation with land owners. Site have been dismissed for spurious reasons. Local Plan does not fully follow the NPP.	J Philip Coverdale
PMSID 0870/S/Gen/2		Not Sound	Lack of 'value' housing is becoming an issue. Insufficient weight placed on encouraging business growth and industry within the Local Plan. Insufficient detail about transportation of people, goods and services in and around city.	J Philip Coverdale
PMSID 0874/S/Gen/1		Not Sound	Inadequate consultation with Parish Council on modifications that cannot be reasonably regarded as minor	Bryan Boulter
PMSID 0874/S/Gen/2		Not Sound	Council to provide proper consultation with Parish Council and regard for the needs of Elvington and the adverse consequences of the proposed developments	Bryan Boulter
PMSID 0878/S/Gen/1			The council should remain committed to building on Brownfield sites. CYC should seek to control the monopoly held by landlords and second home owners on buying property. Many housing issues are not down to shortages but housing affordability. The council should not focus or rely on building projects to provide work for those living in the locality as this is always short term, of low aspiration for our community and is a notoriously unreliable industry. The council should instead focus its efforts on securing interest from large businesses and make York an interesting and viable location for them to come to.	Sarah Mills
PMSID 0879/S/Gen/1			The council should remain committed to building on Brownfield sites. CYC should seek to control the monopoly held by landlords and second home owners on buying property. Many housing issues are not down to shortages but housing affordability. The council should not focus or rely on building projects to provide work for those living in the locality as this is always short term, of low aspiration for our community and is a notoriously unreliable industry. The council should instead focus its efforts on securing interest from large businesses and make York an interesting and viable location for them to come to.	Pat Mills
PMSID 0881/S/Gen/1		Not Sound	Heslington has shouldered a significant amount of development in recent years with its historical character of that being an agricultural community. Further development will convert Heslington into a suburbia.	Cordula Van Wyhe
PMSID 0881/S/Gen/2		Not Sound	Development of arable land will impact farmers, reduce local food production and affect England's self-sufficiency if outside of the European single market	Cordula Van Wyhe
PMSID 0884/S/Gen/1		Not Sound	Respondent objects to plans for building on Green Belt land near Heslington. People need all the green space they can get or keep. Council needs to consider other ways to achieve its objectives.	G L Dutch

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PMSID 0885/S/Gen/1		Not Sound	The overly large amount of green belt land shall require constant amendments to the green belt boundaries and local plan amendments.	Lime Tree Homes Ltd (Thomas Pilcher)
PMSID 0886/S/Gen/1		Not Sound	The plan fails to deliver on the overriding objective of prosperity for all. It lacks any analysis of how different groups in the community are affected by the proposals. It fails to heal the highly unequal conditions of, or deliver opportunities for, all the residents of York. The plan also fails to follow up on the implications of sustainability. It chooses employment and housing options without referencing how they impact on community or environmental sustainability. There is no credible and comprehensive transport strategy to address existing transport and access problems, leaving aside those arising from the proposed new developments.	York Labour Group (Dave Merrett)
PMSID 0886/S/Gen/1			We referred at length in our response last year that there were insufficient land allocations to employment uses of all kinds. It is symptomatic of this plan that an adjustment is made to the employment allocation of one site without reference to the whole. The plan is silent on the employment needs of the city, has not responded to our previous comments and makes the adjustments to this site in isolation to the wide picture.	York Labour Group (Dave Merrett)
PMSID 0886/S/Gen/1			The plan fails to deliver on the overriding objective of prosperity for all. It lacks any analysis of how different groups in the community are affected by the proposals. It fails to heal the highly unequal conditions of, or deliver opportunities for, all the residents of York. The plan also fails to follow up on the implications of sustainability. It chooses employment and housing options without referencing how they impact on community or environmental sustainability. There is no credible and comprehensive transport strategy to address existing transport and access problems, leaving aside those arising from the proposed new developments.	York Labour Group (Dave Merrett)
PMSID 0886/S/Gen/1			We referred at length in our response last year that there were insufficient land allocations to employment uses of all kinds. It is symptomatic of this plan that an adjustment is made to the employment allocation of one site without reference to the whole. The plan is silent on the employment needs of the city, has not responded to our previous comments and makes the adjustments to this site in isolation to the wide picture.	York Labour Group (Dave Merrett)
PMSID 0886/S/Gen/2		Not Sound	The Transport Section's policies are not grounded in any comprehensive analysis of the challenges facing York now, or over the lifetime of the Plan. It relies on an out of date Local Transport Plan and an incomplete Transport Topic paper which only focused on motorized transport. Planned developments and normal traffic growth are projected to result in a 30% general increase in travel time across the network and a staggering 55% increase in peak delay. This will severely impact on residents, businesses and the economy. It will further contribute to air quality problems and will exceed EU emission limits. It is unacceptable. The Council has not responded to any of our points.	York Labour Group (Dave Merrett)

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PMSID 0886/S/Gen/2			The Transport Section's policies are not grounded in any comprehensive analysis of the challenges facing York now, or over the lifetime of the Plan. It relies on an out of date Local Transport Plan and an incomplete Transport Topic paper which only focused on motorized transport. Planned developments and normal traffic growth are projected to result in a 30% general increase in travel time across the network and a staggering 55% increase in peak delay. This will severely impact on residents, businesses and the economy. It will further contribute to air quality problems and will exceed EU emission limits. It is unacceptable. The Council has not responded to any of our points.	York Labour Group (Dave Merrett)
PMSID 0886/S/Gen/3		Not Sound	The only way to achieve genuine sustainability is to cluster new developments. Clusters can work (1) around existing facilities that can take expansion or (2) when new developments are built on a scale that means new facilities and transport linkages can be provided. The plan fails in both ways because it supports over-development in the urban core where balanced and sustainable provision is not possible. Developments proposed on the periphery are too small and will not sustain an appropriate range of new facilities. This is true about community facilities, including green space, and transport equally.	York Labour Group (Dave Merrett)
PMSID 0888/S/Gen/1		Not Sound	If York is to make a fair and equitable contribution to reducing global carbon emissions, if new development is to be truly in line with the NPPF's rhetoric about sustainable development, then all new build developments in York should be car free.	Geoff Beacon
PMSID 0888/S/Gen/2		Not Sound	If York is to make a fair and equitable contribution to reducing global carbon emissions, if new development is to be truly in line with the NPPF's rhetoric about sustainable development, then all new build developments should be using building with materials that are carbon negative such as hempcrete or baufritz.	Geoff Beacon

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General Comments

Unique comment ref	Complies with DtC ?	Legal Compliant/Sound	Comments relating to Legal Compliance / DtC /Soundness or proposed modifications	Submitted By:
PMSID 0889/S/Gen/1		Not Sound	<p>Policy H10 - Affordable Housing - Policy H10 does not form part of the Proposed Modifications, however, it should have been reviewed as part of the current consultation in order to address clear inconsistencies with national policy highlighted in representations to earlier stages of the plan. Table 5.4 within the policy sets thresholds for affordable housing requirements associated with developments of various scales. As drafted, draft Policy H10 is inconsistent with national planning policy. Notwithstanding application of the transitional arrangements, as a policy which, upon adoption, will be used for development management purposes, it is essential that the policy is fully consistent with the latest NPPF to avoid it being 'out of date' and therefore applied with less than full weight at the point of adoption. As drafted Policy H10 does not provide an appropriate strategy for housing development within the City which is justified by the supporting evidence base. Draft Policy H10 does not represent an effective policy and could undermine the delivery of housing over the plan period, and is therefore considered to be unsound. In order to be effective it is essential that the policy is fully consistent with the latest NPPF to avoid it being 'out of date' and therefore applied with less than full weight at the point of adoption. Policy H10 sets out that a vacant building credit (VBC) equivalent to the gross floorspace of the building will be applied to appropriate development where a vacant building is either converted or demolished and is necessary to incentivise the scheme, unless the building has been 'abandoned'. As drafted the policy therefore excludes the automatic application of the vacant building credit and requires the developer to demonstrate that reduction of the affordable housing contribution relative to the existing floorspace being redeveloped is necessary in order to facilitate the development. placing the onus on developers to demonstrate that they require application of the VBC in order to benefit from it as currently set out in draft Policy H10 is a misinterpretation of national planning policy and, for the reasons set out above, further undermines the potential for the Local Plan to deliver sustainable housing development across the City, and is therefore not an effective or sound approach.</p>	Litchfields (Suzanne Yates) OBO Oakgate Group Ltd
PMSID 0894/S/Gen/1		Not Sound	<p>Council has failed to present a consistent and coherent Plan that will deliver the housing and employment for the entire plan period. In particular, policy SS1 is not considered sound as the proposed modifications seek a reduction in the annual housing figure. Further policy SS2 cannot be considered sound as Green Belt boundaries have clearly been drawn up with maximum development restraint in mind, coupled with a highly flawed approach under SS1.</p>	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0894/S/Gen/2		Not Sound	<p>Respondent's concerns relate to: The lower annual housing provision of 790; Green Belt boundaries leaving no scope for future growth should Council acknowledge their plan to is too low; lack of robust Green Belt review and justification; insufficient land allocated for housing. These hold back growth to unreasonably low levels and exacerbate the existing affordability issues.</p>	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0894/S/Gen/3		Not Sound	<p>2018 SLHAA appears to suggest Council has ability to identify sites (including windfall) that's close to achieving the need figures. Should be possible, with SHLAA review, to update plan and include a limited number of additional sites to fully meet need.</p>	Carter Jonas (Simon Grundy) OBO Karbon Homes

15. Summary of General Comments

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PMSID 0894/S/Gen/4		Not Sound	Safeguarded Land should be identified to meet longer term development needs stretching well beyond the Plan period, and to ensure a permanent Green Belt boundary.	Carter Jonas (Simon Grundy) OBO Karbon Homes
PMSID 0895/S/Gen/1		Not Sound	Council has failed to present a consistent and coherent Plan that will deliver the housing and employment for the entire plan period	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/Gen/2		Not Sound	Council has failed to establish a realistic and positive annual housing target, propose appropriate Green Belt boundaries and allocate housing sites.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/Gen/3		Not Sound	2018 SLHAA appears to suggest Council has ability to identify sites (including windfall) that's close to achieving the need figures. Should be possible, with SHLAA review, to update plan and include a limited number of additional sites to fully meet need.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0895/S/Gen/3			Assessments by Rural Solutions maintain that the site (Malton Road H50) fails to contribute to the 5 purposes of the Green Belt and development of the site will not be detrimental to the historic setting and openness of York. The site is immediately deliverable and the NPPF places large emphasis on smaller sites that can diversify and deliver housing quickly. The site should be included for further assessment as a preferred housing allocation.	Carter Jonas (Simon Grundy) OBO Banks Property Ltd
PMSID 0900/S/Gen/1		Not Sound	Concerned about the sustainability of the Local Plan and it requires further consultation. I agree more affordable housing is needed and the percentage is far from that required to truly serve the people of York. I strongly object to building on green belt land.	Jemima Whelan
PMSID 0901/S/Gen/1		Not Sound	Northfields, together with land to the east of Haxby Road known as Mille Crux, forms a 24ha site which since 2012 has been the focus of major investment by York St John University to develop a new centre for sporting excellence. Both Northfields and the Mille Crux site are allocated in the Proposals Map (North) for the emerging Plan as areas of 'Existing University Campuses' and 'Existing Openspace'. Northfields has an additional designation as being within Green Belt land. Policy ED5 of the Plan states the land at Northfield is allocated for sport uses to support the continued success of York St. John University, but omits to include the Mille Crux site from this allocation. It is assumed that this omission is a drafting error, and that Policy ED5 should allocate both Northfields and Mille Crux sites for sport uses, as supported by the explanatory text for this policy and the draft Proposals Map (North).	O'Neill Associates (Phillip Homes) OBO York St John University

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PMSID 0914/S/Gen/1		Sound	Satisfied that the Local Plan is sound	Leeds City Region LEP (James Whiteley)
PMSID 0917-2/S/Gen/1		Not Sound	Not consistent with national policy 47 to boost significantly the supply of housing	Thomas Pilcher
PMSID 0918-1/S/Gen/1		Not Sound	Attempts to provide as low an OAN as arguable and to locate sites away from NIMBY residents. Is not providing range of small and medium sites. Is not proving 20% buffer of sites to meet historic demand. Has not included many sustainable, viable and developable sites.	Robert Pilcher
PMSID 0918-2/S/Gen/1		Not Sound	Does not provide an adequate OAN. The sites are not the most sustainable. There are too few small and medium sites. The green belt boundaries are too restrictive. There is no safeguarded land. No uplift to the OAN has been provided for market signals. Large strategic sites won't deliver housing quickly enough due to infrastructure constraints.	Robert Pilcher
PMSID 0918-1/S/Gen/2		Not Sound	Not justified by the evidence. The evidence has been made to justify the selected sites and not the correct way around.	Robert Pilcher
PMSID 0918-2/S/Gen/2		Not Sound	The plan is not consistent with national policy para. 84 because it does not promote sustainable patterns of development with infilling and obvious rounding off as close to the city as possible.	Robert Pilcher
PMSID 0918-1/S/Gen/3		Not Sound	Not effective because it will not provide an adequate supply of housing, nor a range of deliverable sites.	Robert Pilcher
PMSID 0918-1/S/Gen/4		Not Sound	Not consistent with large parts of the NPPF 2012 against which it is being assessed.	Robert Pilcher
PMSID 0919/S/Gen/1			Consultation material does not list items which are subject to consultation under the new Plan.	Mr Tooby
Proposed Modification				
PMSID 0001/Mod/Gen/1			Allocate more affordable homes	David Marsh
PMSID 0060/Mod/Gen/1			Policy wording of sites falling within the provision of H5 should make explicit the requirement for Gypsy and Traveller site delivery.	Michael Hargreaves Planning OBO York Travellers Trust

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PMSID 0060/Mod/Gen/2			Policy wording of GB4 should be amended to remove ref to 'housing' and to include references to affordable Gypsy and Traveller sites and market Gypsy and Traveller pitches. See rep for wording.	Michael Hargreaves Planning OBO York Travellers Trust
PMSID 0145/Mod/Gen/1			Council should not allow The Stables to be removed from the Green Belt and instead identify an appropriate tranche of brown field land as per NPPG for TSP plots, as instructed by the Planning Inspector in 2011.	Ken Guest
PMSID 0218/ Mod/Gen/1			Submits further evidence to show that Poppleton Glassworks (alt site 955, reference SE55-05YK) does not meet the criteria to qualify as a SINC - the site lacks sufficient qualifying grassland species. The Poppleton Glassworks site does not qualify as a SINC and should be removed as such from the Local Plan as there has been no consideration by the Council of the up to date evidence submitted by JLL and is not consistent with national policy.	JLL (Naomi Kellett) OBO Industrial Property Investment Fund
PMSID 0222/Mod/Gen/2			Consult the local residents to see what they feel the village needs. Take notice of what resident's responses say to previous consultations instead of repeatedly ignoring them.	Joanne Wedgwood
PMSID 0222/Mod/Gen/3			Any residential development in Elvington must provide a better mix of properties within the village. There is a real shortage of larger family homes and of starter homes.	Joanne Wedgwood
PMSID 0222/Mod/Gen/4			Elvington should be officially confirmed as Greenbelt, and protected as such.	Joanne Wedgwood
PMSID 0227/Mod/Gen/2			Consult the local residents and their officers rather than "consult & ignore". Provide a mix of housing, particularly larger houses, keep al Elvington (parish) sites within the Green Belt and treat Elvington like Knapton or Murton.	Matthew Wedgwood
PMSID 0345/Mod/Gen/3			Safeguarded Land. We consider CYC's approach to be flawed and the Plan unsound. IF the Plan does not, in Green Belt terms, look more that 5 years beyond the Plan period, it is very likely that the Green Belt boundary will have to be modified again when the Plan is next reviewed and in the light of the way in which the NPP now operates, the Plan will almost certainly have to be reviewed in the very near future. CYC needs to set out its growth strategy for a period of at least 10 years beyond the Plan period, and make adequate provision for this in terms of boundary specification, allocations and safeguarded land.	Avison Young (Craig Alsbury) OBO Defence Infrastructure Organisation (DIO)
PMSID 0365- 1/Mod/Gen/1			Housing planning cannot be developed in isolation from a skills analysis. Currently the skills our city requires is out of balance with those available. Part of this has resulted from poor housing planning and the lack of affordable and social housing. A full skills analysis must be undertaken to understand the future housing needs of the city.	Rachael Maskell MP for York Central

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PMSID 0365-1/Mod/Gen/2			Old data was used in the development of the local plan. This needs to be reviewed in the light of the Council and Government's new priority to create a Carbon Neutral City. The current plans do not sustain this objective. This requires an ambitious analysis of how public transport and active travel can lead the local transport infrastructure and operations.	Rachael Maskell MP for York Central
PMSID 0365-1/Mod/Gen/3			In order to support a growing population, there needs to be an analysis of the public services which need to expand to support these ambitions. Already our health service is overstretched, including in Primary Care, and schools are full, therefore there needs to be a future needs analysis for York.	Rachael Maskell MP for York Central
PMSID 0582/Mod/Gen/1			Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.	Johnson Mowat (Mark Johnson) OBO Michael Glover LLP - GM Ward Trust, Curry & Hudson
PMSID 0583/Mod/Gen/1			Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.	Johnson Mowat OBO Redrow Homes, GM Ward Trust, K Hudson, C Bowes & E Crocker
PMSID 0603/Mod/Gen/1			CYC reword their vision to be in line with Regulation 19 Publication document in the spirit of effective, sound and justified plan making.	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0603/Mod/Gen/2			Add reference to Policy SS2 (Refer to respondent's representation page 31 for text)	Savills (Uk) Ltd (Rebecca Housam) OBO Retreat Living Ltd
PMSID 0607/Mod/Gen/1			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	Litchfields (Nicholas Mills) OBO Taylor Wimpey Ltd

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PMSID 0609/Mod/Gen/1			The city has continued its exceptional high rate of loss of offices due to the financial attraction of housing conversion, strengthening both our previous calls to increase housing provision to meet need and thereby reduce this pressure, and for the Council to introduce a local plan policy to protect the residual offices in the city centre / gain an exemption from the Government's relaxation, at least until new offices are provided on the York central site.	York and District Trades Union Council (Dave Merrett)
PMSID 0826-1/Mod/Gen/1			Include safeguarded land in the new local plan in line with the advice of John Hobson QC to provide for a period 'well beyond' (10 years) beyond a 15 year plan period, whilst increasing the supply of deliverable sites to address the backlog.	Thomas Pilcher Homes (Thomas Pilcher)
PMSID 0856/Mod/Gen/1			Respondent would like to see housing mix on the outskirts	John Young
PMSID 0858/Mod/Gen/1			Retain Local Plan Section 6 heading (pg. 121) as Health and Wellbeing.	Public Health (Phillipa Press)
PMSID 0861/Mod/Gen/1			Respondent would like to see more use of existing rail network, the reopening of historic rail corridors and the creation of new stations in outlying urban areas and villages outside the city limits. This would help commuter flow, ease vehicle pollution and congestion, thereby affording greater opportunity to have green wedges become more established.	Freeman Johnson Solicitors OBO Mr H C Wrigley
PMSID 0865/Mod/Gen/1			Reallocate ST4 for university use	Catherine Blacketer
PMSID 0869-1/Mod/Gen/1			Suggest revising H2 policy wording "housing development will be expected to achieve the following net densities" and replace with "housing development will be expected to achieve up to but no more than the following net densities"	Ray Calpin
PMSID 0869-1/Mod/Gen/2			Suggest revising H2 policy wording "the following net densities" and replace with "up to a maximum net density of"	Ray Calpin
PMSID 0876-3/Mod/Gen/1			Respondent supports the principle of developing ST15. However, placing the new village (ST15) adjacent to Grimston Bar would be more effective , with more amenities closer to hand particularly established bus routes (and the park and ride) which would encourage less car ownership. there would be less disruption to wildlife, and it would allow the development of Murton hamlet.	Joanne Kinder
PMSID 0888/Mod/Gen/1			Residential developments in the York Local Plan must be car-free.	Geoff Beacon

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PMSID 0888/Mod/Gen/2			The York Local Plan should require that buildings should set a limit on the carbon emissions caused by building construction. If possible, building structure should store carbon.	Geoff Beacon
PMSID 0889/Mod/Gen/1			Policy H10 - Affordable Housing - is directly contrary to national planning policy and guidance in requiring a financial contribution to affordable housing. To make Policy H10 sound it is suggested that the policy reverts to that set out within the Pre- Publication Draft (Regulation 18 consultation document) (2017). This approach is consistent with national policy and has been tested as part of the evidence base. Policy H10 should be updated to clearly reflect the Government's intention, and indeed desire, to see brownfield development and the conversion of existing buildings incentivised by providing a net only contribution to affordable housing. The vacant building credit section should remove any reference to incentivisation as a qualifying factor in order and outline that the conversion of existing floorspace will be eligible for a net reduction in affordable housing in order to make such developments more attractive in the interests of sustainable development.	Litchfields (Suzanne Yates) OBO Oakgate Group Ltd
PMSID 0891/Mod/Gen/1			Should the Council continue to progress the Local Plan under the transitional arrangements and seek a lower housing requirement it is recommended that upon Adoption, a review of the Local Plan is immediately triggered to ensure the Local Plan is updated in line with the Standard Method and updated Framework.	Johnson Mowatt (Mark Johnson) OBO Redrow Homes
PMSID 0910/Mod/Gen/1			Brown field sites should be considered first. All potential sites with better transport links should be used first.	Chris Hawkswell
PMSID 0910- 2/Mod/Gen/1			Use brown field sites in an around York to attract businesses	Chris Hawkswell
PMSID 0912/Mod/Gen/1			Priority should be given to the development of brown field sites instead of green belt land	Stephen Hawkswell
PMSID 0917- 2/Mod/Gen/1			To include all of the deliverable sites offered and not to exclude viable and deliverable sites to favour NIMBY	Thomas Pilcher
PMSID 0918- 1/Mod/Gen/1			The inclusion of many more small to medium sized sites which could support smaller local house builders.	Robert Pilcher
PMSID 0918- 2/Mod/Gen/1			Include site 191 to H1 allocated developments because it is a deliverable, viable and sustainable site. This should be also applied to other small and medium sites to fix the housing supply crisis quickly.	Robert Pilcher