

**From:** Rachael Maskell [REDACTED]  
**Sent:** 27 March 2023 22:23  
**To:** localplan@york.gov.uk  
**Cc:** [REDACTED]  
**Subject:** Local Plan 2023 Major Modification consultation  
**Attachments:** RM LP Mods submission 27 03 2023.pdf

This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Local Plan Team,

Please find attached Rachael Maskell MP's Local Plan 2023 Major Modification consultation response.

We are submitting following problems encountered with the online tool. We understand Dave Merrett spoke to an Officer this afternoon, who advised that this method of submission would be acceptable. To note, following his advice, we also completed the online form in relation to the first point and attached this PDF there too.

If there are any problems with this document or consultation response please could you call Laura Outhart on [REDACTED]

Best wishes,

Laura

Laura Outhart  
Assistant to Rachael Maskell MP

## City of York Local Plan Modifications Consultation

Response from Rachael Maskell MP

I can confirm I understand that the comments made during this consultation should relate to the proposed Main Modifications, Policy Map changes, associated Sustainability Assessment (SA) or Habitat Regulation Assessment (HRA) Addenda and new evidence documents. All representations made will be taken into account by the Inspectors in examining the Plan. Comments should relate to the Plan's legal and procedural compliance and the soundness of the modifications. The tests of soundness are set out in the [National Planning Policy Framework](#).

Please read our [guidance note](#) for more information on taking part.

Our survey asks for some personal information which you may choose not to give. We do not publish or share any information which can identify you. Please read our [privacy notice](#) to find out more about how we protect your personal information. We will ask for your consent to this at the start of the survey.

You can withdraw your consent at any time by contacting [localplan@york.gov.uk](mailto:localplan@york.gov.uk).

*I, Rachael Maskell, confirm that I have read and understood the privacy notice.*

### **Please find below a summary of my objections to the City of York Council modifications.**

#### **Section 2: Vision and Development Principles – Objection on grounds detailed below**

##### **Paragraph 2.5 Provide Good Quality Homes and Opportunities - objection**

###### **MM2.1 (and also Policy SS1: Delivering Sustainable growth for York MM3.1)**

As per the York Labour Party (YLP) submission, I oppose the reduced housing number as it is grossly inadequate for reasons detailed in previous submissions by myself and YLP. I note that York's house prices continue to escalate, despite house prices in most other areas are stagnating or in decline. This means affordability in York continues to worsen. In February, the Centre for Cities report found York to be the least affordable city in the north of England, ranked at 13<sup>th</sup> nationally (the next northern city was Manchester ranked 32<sup>nd</sup> nationally). As per the YLP submission, 2021 census data confirms working age families are being displaced. I reiterate YLP's request that the Inspector recommends the Council commissions additional work around the housing numbers.

Reason: Not Positively prepared, not justified, not effective, and not consistent with national policy.

##### **Policy DP2 - objection**

**MM2.3.** I support the YLP recommendations in relation to policy DP2.

Reason: Not Effective

**MM2.4.** I support the YLP comment on DP2 regarding consequential amendments to the supporting text.

Reason: Not Effective

**SS4: York Central - objection**

**MM3.10.** I support the YLP points on this matter.

I further note the continued lack of on-site community facilities and public services in this policy. A lack of provision of these services on site undermines the quality of the development and will undermine the development of a sustainable community at York Central, that puts undue pressure on health, education and leisure services in neighbouring areas that in many cases are already over-subscribed and over-stretched.

Reason: Not justified, not effective, and not consistent with national policy .

**SS12: Land West of Wigginton Road - objection**

**MM3.41.** I support YLP points on this matter.

**Policy SS13: Land West of Elvington Lane (ST15) – objections & noted support**

**MM3.47.** I support the comments made by YLP in relation to this matter.

Reason: Not justified, not effective, and not consistent with national policy

**MM3.53.** I support YLP amendment to provide a secondary school on this site.

**MM3.54.** I support the YLP response relating to this matter.

Reason: Not justified, not effective, and not consistent with national policy

**EX/CYC/89 - objection**

I support the YLP response to this matter.

Reason: Not justified, not effective, and not consistent with national policy

**SS22: University of York Expansion**

**MM 3.77** I support comments by YLP on this matter.

Reason: Not Positively Prepared

**Section 5: Housing - objections**

**MM5.1**

I support comments by YLP on this matter.

Reason: Not Effective

**MM5.8.**

I support the comment made by YLP on this matter.

Reason: Not Effective

**Policy H5: Gypsies and Travellers - objections**

**MM5.12** – I support the comments made by YLP on this matter. I further note that current sites do not have suitable community facilities and these must be provided on all new sites and must be upgraded on existing sites, before any expansion takes place.

Reason: Not Effective

**Policy H7: Off campus purpose-built student accommodation - objection**

**MM5.17** I support the comments made by YLP on this matter.

Reason: Not Effective

**Policy H7: Affordable Housing- objection**

**MM5.21**

I support the YLP comments made on this matter.

Reason: Not Effective

**MM5.22**

I support the YLP comments made on this matter.

Reason: Not Effective

**Section 8: Placemaking, Heritage, Design and Culture - objections**

**Policy D3: Cultural Provision - objection**

**MM8.4.** I support the YLP comments on this matter.

Reason: Not effective

**Section 9: Green Infrastructure - objection**

**Policy GI1: Green Infrastructure** – I strongly support the YLP comments on this matter and call for this modification to be rejected.

**Policy G12a: Strensall Common – support**

**MM9.6** I support YLP comments on this matter.

**Policy G15: Protection of Open Space and Playing Fields - objection**

**MM9.8** I strongly support YLP comments on this matter. As the density of the urban core increases it is absolutely vital that the strongest possible protections are in place for green spaces in built up areas.

**Section 11: Climate Change - Objections**

**MM11.1.**

I support YLP points made on this matter.

Reason: Not positively prepared, not justified, not effective, and not consistent with national policy

**Policy CC1 - objection**

**MM11.3.** I support YLP comments on this matter.

Reason: Not effective

**Policy CC2 - objection**

**MM 11.12** I support YLP comments in relation to this matter.

Reason: Not Positively Prepared, not justified, not effective, and not consistent with national policy

**Section 12. Environment - objections**

**MM12.1** I support the comments made by YLP in relation to this matter.

Reason: Not justified, not effective, and not consistent with national policy.

**MM12.2** I support the comments made by YLP in relation to this matter.

Reason: Not justified, not effective, and not consistent with national policy.

**Section 14: Transport and Communications - objections**

**MM14.1** I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not justified, not effective, and not consistent with national policy

**MM14.3.** Policy T1 Explanation

I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not justified, not effective, and not consistent with national policy

**Policy T2: Strategic Public Transport Improvements - objections**

**MM14.4.** I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not justified, not effective, and not consistent with national policy

**Policy T4: Strategic Highway Network Improvements - objections**

**MM14.7.** I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not justified, not effective, and not consistent with national policy

**Policy T5: Strategic Cycle and Walking Network Links & Improvements - objections**

**MM14.8.**

I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not justified, not effective, and not compliant with national policy

**Policy T6: Development at or Near Public Transport corridors, Interchanges and Facilities - objections**

**MM14.9.** I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not effective.

**Policy T8: Demand management -objections**

**MM14.11** I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not justified, not effective, and not consistent with national policy

**Section 15: Delivery and Monitoring - objections**

**MM15.3** I support the comments made by YLP in relation to this matter.

Reason: Not justified, not effective, not consistent with national policy

**CYC/87a and CYC/91.** I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, and not consistent with national policy

**EX/CYC/107/8** - objections

I support the comments made by YLP in relation to this matter.

Reason: Not positively prepared, not justified and not effective.

**Para 2.5 Provide Good Quality Homes and Opportunities - objections**

**Policy SS1: Delivering Sustainable growth for York**

[EX/CYC/92](#) Local Housing Needs Assessment By Icen July 2022

[EX/CYC/107/3](#) Student Housing Policy H7 Note August 2022

I strongly support the comments made by YLP in relation to Local Housing Needs Assessment and share their serious concerns about reduced housing numbers.

**Policy H3: Balancing the Housing Market - objection**

In line with the YLP submission, I consider the proposed modification on MM5.8 to policy H3 is unsound, for the reasons outlined in their submission.

**PMM19 and PMM50 relating to modifications to the green belt removing St. Peter's School from the plan - objection**

I strongly oppose the modifications PMM18 and PMM50 at St Peter's School and request their removal from the plan. The reasoning for this was detailed in the City of York Council's EX/CYC/59c: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4.

It is important to keep land permanently open to preserve the setting of the historic city, to prevent urban sprawl and to safeguard the countryside from encroachment. I, therefore, request that the boundary line of the green belt, follows the edge of the St. Peter's school building, as per the 2021 modifications; PM75 within EX/CYC/58: Composite Modifications Schedule April 2021.

I am concerned that shifting the previously proposed greenbelt boundary and giving this land an 'education allocation' will pose a risk to the openness of the land, with its clear views of the Minster within a compact urban setting. The fields of St Peter's and Queen Anne's play a vital role in off-setting the density of the urban setting and provides a vital public amenity –as a green, open space forming part of the river corridor. As part of this river corridor, the land functions as part of the 'countryside' offering openness and views.

The green wedge and wider biodiversity connection to the Site of Special Scientific Interest at Rawcliffe Meadows and Clifton Ings is important environmentally as well as being of high amenity value within the inner green belt area. Further to this, I am concerned that views of the Minster could be impacted by opening up the increased risk of unrestricted sprawl e.g. if the new designation allowed for the introduction of floodlit, artificially-surfaced hockey pitches on this land.

The previously proposed line (PM75 EX/CYC/58 [2021]) offers a more robust boundary to the Green Belt at St Peters School with a greater degree of permanence.

Reason: not justified, not effective.





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# City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #445 ▼



COMPLETE

**Started:** Monday, March 27, 2023 9:20:01 PM  
**Last Modified:** Monday, March 27, 2023 10:14:14 PM  
**Time Spent:** 00:54:13  
**IP Address:** 92.21.105.133

Page 1: Survey Information

### Q1

Do you confirm that you have read and understood the privacy notice? You must select 'Yes' in order to take the survey.

Yes

Page 2: Register for consultation

### Q2

Your name:

Rachael Maskell

### Q3

Contact details: Please provide email and/or address

Organisation (optional) MP for York Central

Address Houses of Parliament

City/town London

Post code SW1A 0AA

Email address [REDACTED]

### Q4

Do you wish to be notified when the City of York Local Plan is adopted by the Council? If yes we will use contact details provided above

Yes

Page 3: Your response

### Q5

To which consultation document does this response relate? Please note, links shown beside each option are for associated documents.

Proposed Main Modifications - link

Share Link



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459 responses



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To which section does this response relate?

Section 2: Vision

Page 5: Section 2: Vision

**Q7**

To which modification does this response relate?

MM2.1 Paragraph 2.5

Page 6: Section 3: Spatial Strategy

**Q8**

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

**Q9**

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

**Q10**

To which modification does this response relate?

Respondent skipped this question

Page 9: Section 6: Health and Wellbeing

**Q11**

To which modification does this response relate?

Respondent skipped this question

Page 10: Section 7: Education

**Q12**

To which modification does this response relate?

Respondent skipped this question

Page 11: Section 8: Placemaking, Heritage, Design and Culture

**Q13**

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

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459 responses

To which modification does this response relate?

Respondent skipped this question

Page 13: Section 10: Managing Development in the Green Belt

**Q15**

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

**Q16**

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

**Q17**

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

**Q18**

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

**Q19**

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

**Q20**

To which modification does this response relate?

Respondent skipped this question

Page 19: New evidence documents

**Q21**

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

**Q22**

Do you support or object to the proposed modification(s)?

Object

**Q23**

If you object, please select your reason from the list below (select all that apply):

---

Not positively prepared - i.e. strategy will not meet development needs

---

Not justified - i.e. there is no evidence to justify the modification

---

Not effective - i.e. it won't work

---

Not consistent with national policy - i.e. doesn't comply with the law

**Q24**

Please set out the reasoning behind your support or objection: Please note there is a 1000 character limit, therefore if your reason for support or objection is longer than this, please summarise the main issues raised.

---

Due to problems encountered with online tool, I have asked my office to submit my full response to this consultation by email. I understand from Dave Merrett from York Labour Party that he discussed the problems with the online submission with Officers earlier today and this method of submission is acceptable.

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Reason: Not justified, not effective, and not consistent with national policy

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**MM 3.77** I support comments by YLP on this matter.

Reason: Not Positively Prepared

**Section 5: Housing - objections**

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Reason: Not Effective

**MM5.8.**

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**Policy CC1 - objection**

**MM11.3.** I support YLP comments on this matter.

Reason: Not effective

**Policy CC2 - objection**

**MM 11.12** I support YLP comments in relation to this matter.

Reason: Not Positively Prepared, not justified, not effective, and not consistent with national policy

**Section 12. Environment - objections**

**MM12.1** I support the comments made by YLP in relation to this matter.

Reason: Not justified, not effective, and not consistent with national policy.

**MM12.2** I support the comments made by YLP in relation to this matter.

Reason: Not justified, not effective, and not consistent with national policy.

**Section 14: Transport and Communications - objections**

**MM14.1** I support the comments made by YLP in relation to this matter.

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**MM14.3.** Policy T1 Explanation

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**Policy SS1: Delivering Sustainable growth for York**

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