

From: Philip Holmes [REDACTED]
Sent: 27 March 2023 19:45
To: localplan@york.gov.uk
Subject: RE: Draft Local Plan MM Consultation
Attachments: CYC Local Plan Mods Consultation 23 - Policy EC1 - MM4.2.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.

Further to the email below, we have noticed that our representations on Proposed Modification MM4.2 in relation to Policy EC1 contained a minor error.

This has been rectified in the attached representation documents for MM4.2, which we now formally submit to replace the version submitted earlier this evening.

All other representations submitted in the email below are unchanged.

Kind regards

Philip Holmes | [REDACTED]

O'Neill Associates

Lancaster House | James Nicolson Link | Clifton | York YO30 4GR | 01904 692313

www.oneill-associates.co.uk

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From: Eamonn Keogh [REDACTED]
Sent: Monday, March 27, 2023 6:21 PM
To: localplan@york.gov.uk
Cc: Philip Holmes [REDACTED]; Graeme Holbeck [REDACTED]; Tim Ross [REDACTED]
Subject: Draft Local Plan MM Consultation

Dear Sirs,

Please find attached representations on proposed modifications to the Local Plan. If you have any queries regarding the submission, please do not hesitate to contact me.

Regards

Eamonn Keogh

O'Neill Associates

Eamonn Keogh | [REDACTED]

Lancaster House | James Nicolson Link | Clifton | York YO30 4GR | 01904 692313

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1. Survey Information

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 We do not publish or share any information which can identify you.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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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



No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

Please refer to attached representations Reference Ylp2023.cc2.gh

Modification Ref: **MM11.5; MM11.6; MM11.11**

Representation on behalf of O'Neill Associates

SUMMARY

Since the publication of the Draft Local Plan in 2018, the wording of policy CC2 has been cause for confusion amongst the local development industry and its requirements have been inconsistently applied via conditions on individual planning permissions. The proposed revised wording needs to be more closely aligned with the changes to the Building Regulations (Amendment) 2021, which they are attempting to reflect, or removed all together. This is on the basis that a condition which duplicates the effect of other controls will normally be unnecessary, and one whose requirements conflict with those of other controls will be ultra vires because it is unreasonable.

The current Part L regulations are dated from 2021 and came into force in June 2022. There was a grace period imposed whereby schemes could still be assessed against Part L of the 2013 regulations providing submission was made prior to June 2022 and the development commenced on site before June 2023. By the time the Local Plan is adopted, this grace period will have ended and the consistent reference to the 2013 Building Regulations within Policy CC2 is therefore considered to over-complicate the policy. It is likely to lead to confusion for developers and inconsistency in the application of the policy on individual planning applications.

For example, CC2 separates the requirements for residential and non-residential whereas the building regulations are not split in the same way – they refer to domestic and non-domestic. This creates conflicting requirements between complying with the regulations and satisfying planning policy. As a case in point, purpose-built student housing is considered under Category A (residential) in terms of Policy CC2, but the use category under the building regulations is non-domestic for the purposes of Part L. So, the current policy wording would require SAP calculations to be performed under the residential category but the modelling software used to satisfy Part L will produce an SBEM calculation for the whole building, not individual SAP calculations.

In our view, if the reason for the change is to respond to the new Part L of the 2021 regulations and any future targets brought in through the anticipated future homes standard then these should simply be referenced in the policy rather than trying to equate them to the 2013 regulations. With this in mind, we make the following comments:

Main Modification 11.5 – Suggested Changes to Wording

Criteria (i) - The 31% reduction in on-site carbon emission over and above Part L 2013 is broadly equivalent of the recently introduced Part L 2021. This reference should be **removed** and **replaced** with text requiring compliance with Part (L) 2021 and any subsequent updates. Furthermore, the justification for 19% of the reduction being specifically assigned to energy efficiencies measures is not clear and the implications of this for development cannot be properly understood within the current drafting.

For the same reason, the reference to pending anticipated changes to the building regulations and the aim to achieve a further 75% reduction over and above Part L (2013) should also be **removed**. Whilst aspirational, the wording of this policy imposes a requirement on developers to demonstrate why such a reduction would not be feasible or viable, which is overly onerous.

Main Modification 11.6 – Suggested Changes to Wording

Criteria (i) – Once again, this policy wording should be **removed** and replaced with text requiring compliance with Part L (2021) and any subsequent updates. The reference to ‘a 28% reduction on Part L (2013) unless it is demonstrated that such a reduction is not feasible or viable’ will cause confusion with the implementation of the 2021 Regulations. Bearing in mind it will not be possible to obtain (building regulations) approval for a scheme that did not meet the new regulations anyway.

Main Modification 11.11 – Suggested Changes to Wording

The Policy Explanation to CC2 should be amended to reflect the above proposed changes.

Ref: Ylp2023.cc2.gh

Date: 27 March 2023

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The threshold for all major developments (10 units or more, 0.5 hectares or 1000sqm) to evaluate the feasibility and viability of developing a site-wide decentralised energy network is too low. This is on the basis that the prior stage (to assess the feasibility of connecting to an existing network) is likely to result in a negative outcome since there are no known networks within the city at present.

If the aim of this policy is to ensure that new developments will have the necessary infrastructure in place to connect to a decentralised network once they become available, then the feasibility of this should be considered. For instance, will it be secured through condition. On a new-build block of flats, who will be responsible to facilitating the connection to a network that could be delivered 5-10 years after the development has been occupied. Similarly, how feasible will this be for small scale developments where each unit generates its own heat.

The practicalities of how this policy is to be imposed and its impact on development need further consideration and consultation with the development industry should be undertaken looking at relevant case studies

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input checked="" type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

All s106 payments are subject to viability and this should be explicit in D1 supporting text to ensure consistency with national policy. Suggested wording “developer contributions and CIL will be directed towards primary and secondary healthcare, open space in line with the Infrastructure Delivery Plan in accordance with the tests set out in the CIL regulations

The cumulative impact of the modifications/ policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and as such it is unlikely to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Contrary to paragraph 173 and 174 NPPF (2012) viability has not been properly considered with regards to cumulative impact.

NPPF (2012) paragraph 173. states that “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.” Paragraph 174 states that “...*Local Planning Authorities... should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle*”

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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



No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

See attached 'Response on behalf of O'Neill Associates' ref. ec1.reps.2303, March 2023

City of York Local Plan Modifications Consultation 2023

Response on behalf of O'Neill Associates

Consolidated Main Modifications (January 2023) - Modification Ref. MM4.2 on Policy EC1: Provision of Employment Land

- 1.1 These representations are made on behalf of O'Neill Associates in response to the City of York Local Plan Modifications Consultation 2023. Specifically, the representations relate to modification ref. MM4.2 of the Consolidated Main Modifications (January 2023) document relating to **Policy EC1: Provision of Employment Land**.
- 1.2 Policy EC1 relates to provision of employment land required to meet York's Sustainable Growth needs and accommodate an annual provision of around 650 new jobs as set out in Policy SS1 of the Plan.
- 1.3 The Policy sets out the Plan's approach to in relation to its overall forecast for jobs and how this has been
"disaggregated into the different economic sectors and converted into floorspace requirements using widely recognised job density and plot ratio assumptions" (para 4.6).
- 1.4 Overall, the Plan identifies a total requirement for around 38ha of new employment land to be provided across the plan period 2017-2032/33 with an additional five years to 2038 to ensure Green Belt permanence. The Employment Land Requirements are set out at Table 4.1 of Policy EC1, as below:

Table 4.1: Employment Land Requirements 2017-2038 (including 5% vacancy), Factoring in Change of Supply 2012-2017 and Including 2 Years Extra Supply, updated March 2022

Use Class	2021-33		2033-38		Total 2021-2038	
	Floorspace (m ²)	Land (Ha)	Floorspace (m ²)	Land (Ha)	Floorspace (m ²)	Land (Ha)
Office (formerly B1a)	137,588	15.5	12,310	2.1	149,898	17.6
Research & Development (B1b)	15,655	3.7	1,644	0.4	17,299	4.1
Light Industrial (formerly B1c)	11,218	1.9	1,435	0.4	12,653	2.3
General Industrial (B2)	0	0	0	0	0	0

Storage & Distribution B8	54,986	10.5	15,705	3.2	70,691	13.7
B Uses Sub Total	219,447	31.6	31,094	6.2*	250,541	37.7
D2	-17,887	-1.1	4,398	1.1	-13,489	0
Totals	201,560	30.5	35,492	7.2	237,052	37.7

1.5 To meet the identified need for new employment land, Policy EC1 lists five strategic and five non-strategic allocated sites at which provision is to be made for a range of employment uses. These are detailed in EC1 as follows:

Strategic Sites

Site	Floorspace (m ²)	Suitable Employment Uses
ST5: York Central	100,000	Office (E)
ST19: Land at Northminster Business Park (15ha)	49,500	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8), + element of Office (E) in line with Policy SS23.
Campus East + ST27: University of York Expansion (21.2ha)*	40,000*	Knowledge based businesses (E)
ST26: Land South of Airfield Business Park, Elvington (7.6ha)	25,080	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
ST37: Whitehall Grange, Wigginton Road (10.1ha)	33,330	Storage/Distribution (B8).

*This is an approximate and indicative figure based on the University of York's predicted growth and may be reduced to accommodate other employment generating University uses identified in Policy ED1

Other Sites

Site	Floorspace (m ²)	Suitable Employment Uses
E9: Elvington Industrial Estate (1ha)	3,300	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
E10: Chessingham Park, Dunnington (0.24ha)	792	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
E11: Annamine Nurseries. Jockey Lane (1ha)	3,300	Office (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8)
E16: Poppleton Garden Centre (2.8ha)	9,240	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8). May also be suitable for element of Office (E)
E18: Towthorpe Lines, Strensall (4ha) *	13,200	Light Industrial (E), Industrial (B2) and Storage/Distribution (B8).

* Given the site's proximity to Strensall Common SAC (see explanatory text), this site must take account of Policy GI2a.

1.6 Policy EC1 therefore anticipates that the strategic employment allocations will provide a total floorspace of 247,910m², and that the non-strategic allocations will provide a further 29,832m². Overall, the allocations are expected to deliver a total

277,742m² of employment floorspace in context of an identified need of 237,052m² for the period 2017 to 2038 as set out at Table 4.1 of EC1.

1.7 Proposed Modification ref. MM4.2 states that the Council's amendments to Policy EC1 *"reflect the Status of Employment Allocations identified in Policy EC1 Note August 2022 (EX/CYC/107/7)"*.

1.8 However, there appears to be some key inconsistencies between Policy EC1 and Policy EX/CYC/107/7, which states that:

- **Strategic Site ST37 (Whitehall Grange) is not available for development** being subject of approvals and development for a car storage facility, with no capacity remaining for further development
- **Non-Strategic Site E16 (Poppleton Garden Centre) is not available for development** being in use as a Garden Centre, on which basis *"the Council consider the land is no longer available for employment use"* (p. 17).
- **Non-Strategic Site E10 (Chessingham Park) is fully developed**, having delivered 372m² of Class B2 floor space (as opposed to the 792m² identified in EC1) with no capacity remaining for future development.

1.9 In light of the above, and in order to fully *"reflect the Status of Employment Allocations identified in Policy EC1 Note August 2022 (EX/CYC/107/7)"*, we consider that Sites ST37, E16 and E10 should be removed from the employment allocations in Policy EC1.

Strategic Sites

Site	Floorspace (m ²)	Suitable Employment Uses
ST5: York Central	100,000	Office (E)
ST19: Land at Northminster Business Park (15ha)	49,500	Light Industrial (E), Industrial (B2) + Storage/Distribution (B8), + element of Office (E) in line with Policy SS23.
Campus East + ST27: University of York Expansion (21.2ha)*	40,000*	Knowledge based businesses (E)
ST26: Land South of Airfield Business Park, Elvington (7.6ha)	25,080	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).
Strategic Site Total Floorspace	214,580	

Other Sites

Site	Floorspace (m ²)	Suitable Employment Uses
E9: Elvington Industrial Estate (1ha)	3,300	Research & Development (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8).

E11: Annamine Nurseries. Jockey Lane (1ha)	3,300	Office (E), Light Industrial (E), Industrial (B2) + Storage/Distribution (B8)
E18: Towthorpe Lines, Strensall (4ha) *	13,200	Light Industrial (E), Industrial (B2) and Storage/Distribution (B8).
Other Site Total Floorspace	19,800	
Overall Total Floorspace	234,650	

1.10 The above table demonstrates that the allocated sites will not meet the employment floorspace requirement of 237,052m² as identified in Table 4.1 of Policy EC1. Furthermore, the modifications to Policy EC1 also do not properly take account of the current status of the other employment allocations, as we set out below.

ST5: York Central

1.11 The outline permission (18/01884/OUTM) for York Central includes provision for between 70,000m² and 87,693m² of office space, falling significantly short of the 100,000m² quantum as set out in Policy EC1.

1.12 Policy Note EX/CYC/107/7 states the remaining 12,307m² to 30,000m² of floorspace can be provided on land outside the area of 18/01884/OUTM. In support of this, EX/CYC/107/7 cites land at Chancery Rise, the York Station frontage, and the Leeman Road Royal Mail site as potential locations for employment land. However, it must be noted that:

- the Chancery Rise site is in use by Network Rail as an engineering works depot
- EX/CYC/107/7 confirms that Royal Mail has stated it has no intention to close or relocate from its Leeman Road site.
- There is no evidence that the York Station frontage can deliver over 13,000m² of office floorspace from a plot of 2.57ha, at a yield of 5,058m² per hectare, as is suggested by EX/CYC/107/7.

ST19: Land at Northminster Business Park

1.13 Draft Policy EC1 allocates 15ha of land to allow for the further expansion of the Northminster Business Park on land adjoining the southern boundary of the site. It states that site ST19 will deliver an additional 49,500m² of employment floorspace, representing a yield of 3,300m² per hectare. Modification MM4.2 states the allocation as suitable for light industrial (Class E), industrial (Class B2) and storage/distribution (Class B8) uses, with an element of office (Class E) use.

1.14 The modifications are informed by EX/CYC/107/7 which confirmed that ST19 has been subject of a planning approval (21/00796/FULM) for a new distribution

facility for DPD (now completed), which delivered 5,570m² B8 floorspace on 3.79ha (at a yield of 1,470m² per ha). EX/CYC/107/7 states that 11.21ha of site ST19 remains available for development.

- 1.15 However, if the modifications were to properly take account of the current status of this site allocation, it would need to include the following factors:
- An extant permission (13/03170/FULM) on 0.348ha land at the northeast corner of ST19, provides 1,087m² of B2/B8 floorspace (at 3,123m² per ha).
 - A current change of use application (22/02605/FUL) for existing agricultural buildings on ST19 which will provide 1,931m² of B2, B8 and E(g) uses on 0.9655ha of land (at 2,000m² per ha)
 - The fact that development of the remaining land within site ST19 would need to provide appropriate landscaping at the southern and western boundaries in accordance with other placemaking policies in the Plan.
- 1.16 The attached plan ref. 2337.P414 C is submitted to illustrate the actual current status of the site, taking into account the above factors. This demonstrates that:
- the completed development, approvals and current applications, at ST19 represent a delivery of 8,588m² of floorspace at 1,683m² per hectare
 - the remaining developable area of ST19 is 9.338ha, and not 11.21ha as stated in EX/CYC/107/7.
 - in order to achieve the 49,500m² quantum of employment floorspace envisaged for ST19, the remaining land will not to deliver over 4,327m² per hectare, which is far in excess of the job density and plot ratios assumed by the Council

Heslington Campus East and ST27: University of York Expansion (21.2ha)

- 1.17 Modification MM4.2 states that the University of York's Campus East and expansion site can accommodate 40,000m² of knowledge based businesses (Class E). However, the modification includes the proviso that:
- "This is an approximate and indicative figure based on the University of York's predicated growth and may be reduced to accommodate other employment generating University uses identified in Policy ED1"*
- 1.18 Further to the above, it is the case that this allocation will solely be for knowledge based uses linked to the academic purposes of the University, and as such will not be available to the general market for employment uses.

ST26: Land south of Airfield Business Park

- 1.19 Draft Policy EC1 allocates 7.6ha of land to the south of Elvington Airfield Business Park, which is expected to deliver 25,080m² of employment floorspace (a yield of 3,300m² per hectare). Modification MM4.2 states the allocation as suitable for research and development and light industrial (Class E), industrial (Class B2) and storage/distribution (Class B8) uses.
- 1.20 EX/CYC/107/7 confirms that ST26 has been subject of a planning approval (18/02839/FUL) for a new industrial building, which will deliver 3,924m² of B1/B2/B8 floorspace. EX/CYC/107/7 states that 7.2ha of site ST26 remains available for development.
- 1.21 However, if the modifications were to properly take account of the current status of this site allocation, it would need to include the following factors:
- The application site for approved development 18/02839/FUL is 1.616ha, and not 0.4ha as stated in EX/CYC/107/7
 - The developable area of site ST26 will be reduced due to the existence of an existing road (Brinkworth Rush) which bisects the site, as well as the need to provide appropriate boundary landscaping in accordance with other placemaking policies in the Plan.
- 1.22 The attached plan ref. 2337.PL415 C is submitted to illustrate the actual current status of the site, taking into account the above factors. This demonstrates that:
- the current approval 18/02839/FUL at ST26 will represent a delivery of 2,428m² employment floorspace per hectare
 - the remaining developable area of ST26 is 5.04ha, and not 7.2ha as stated in EX/CYC/107/7.
 - in order to achieve the 25,080m² quantum of employment floorspace envisaged for ST19, the remaining land will not to deliver over 4,365m² per hectare, which is far in excess of the job density and plot ratios assumed by the Council

E18: Towthorpe Lines, Strensall

- 1.23 Policy EC1 allocates 4ha of land at Towthorpe Lines, which is stated as being capable of delivering 13,200m² of employment floorspace at 3,300m² per hectare. MM4.2 states site E18 is suitable for light industrial (Class E), industrial (Class B2) and storage/distribution (Class B8) uses.
- 1.24 Modification MM4.2 proposes to include additional text to Policy EC1 to highlight the site's proximity to the Strensall Common Special Area of Conservation (SAC),

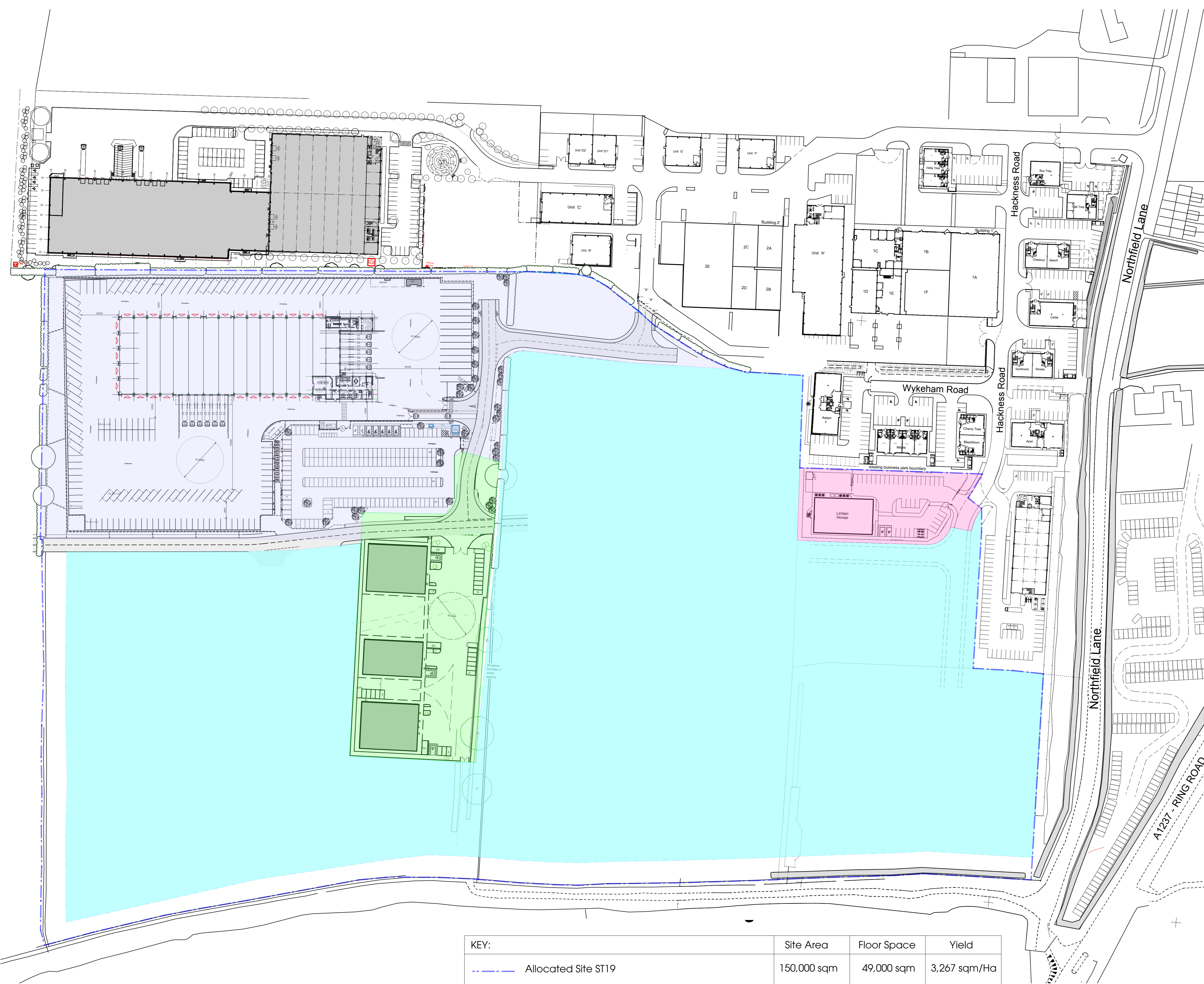
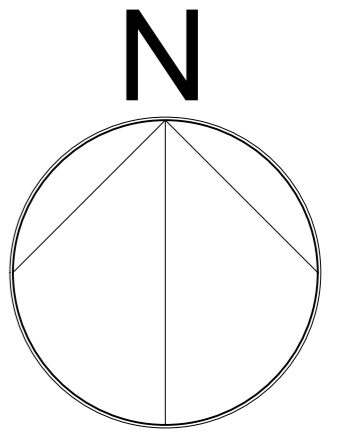
and reference new explanatory text proposed for Policy EC1 (modification MM4.5) and the additional new Policy GI2a (modification MM9.6) in relation to the Strensall Common SAC.

- 1.25 The newly proposed modifications mean that the employment land allocation at Towthorpe Lines can only be delivered subject to development demonstrating that it will have no adverse impact on the integrity of the SAC, either alone or in combination with other plans or projects.
- 1.26 It is unclear how, or if, the employment uses as proposed by modification MM4.2 – encompassing industrial, and storage and distribution uses - can be reconciled with the overriding need to protect the biodiversity value of the SAC, including heathland habitat which is particularly vulnerable to changes in air quality.
- 1.27 This places considerable doubt on whether the site can be delivered for employment purposes, let alone achieve the 13,200m² of employment floorspace which is envisaged in Policy EC1. As a minimum, the application of the Council's 3,300m² per hectare plot ratio should not be considered appropriate, particularly given that this ratio has not always been achieved by committed development at other allocated employment sites which do not have ecological constraints.

Conclusions

- 1.28 Proposed modification MM4.2 is therefore not supported by O'Neill Associates on the basis that it does not properly meet the test for soundness as set out in Paragraph 182 of the 2012 NPPF, as follows:
 - It has not been positively prepared to fully meet the identified need for new employment land as identified the Local Plan, and does not reflect the current status of the employment allocations or Policy EC1 Note, August 2022 (ref. EX/CYC/107/7)
 - It will not be effective in achieving the quantum of housing land and floorspace required to meet York's Sustainable Growth needs and accommodate an annual provision of around 650 new jobs as set out in Policy SS1 of the Plan.
 - It is not consistent with national policy in that will not enable the delivery of sustainable development in accordance with the policies in the NPPF.

ref. ec1.reps.2303
March 20235



Note
Subject to Detailed Site Survey

KEY:	Site Area	Floor Space	Yield
Allocated Site ST19	150,000 sqm	49,000 sqm	3,267 sqm/Ha
DPD Plot (21/00796/FULM), already built	37,900 sqm	5,570 sqm	1,470 sqm/Ha
Current Change of Use Application (22/02605/FUL)	9,655 sqm	1,931 sqm	2,000 sqm/Ha
Extant Planning Approval (13/03170/FULM)	3,480 sqm	1,087 sqm	3,123 sqm/Ha
Remaining Developable Area of ST19 (excluding boundary landscaping)	93,380 sqm	40,412 sqm	4,327 sqm/Ha

C	27.03.23	Key altered.	PJD
B	27.03.23	Key, boundaries and title / drawing numbered altered.	PJD
A	23.03.23	First Issue.	REL/TJC
Rev.	Date	Description	Drawn

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Client

Pavers Ltd.

Project

**Proposed Unit,
Northminster Business Park, York.**

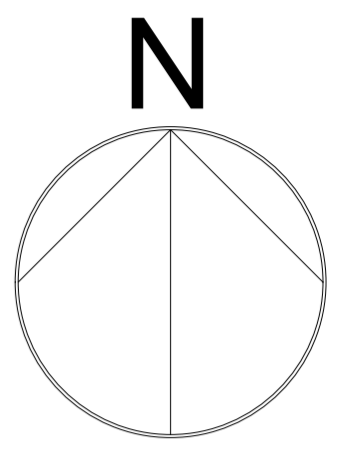
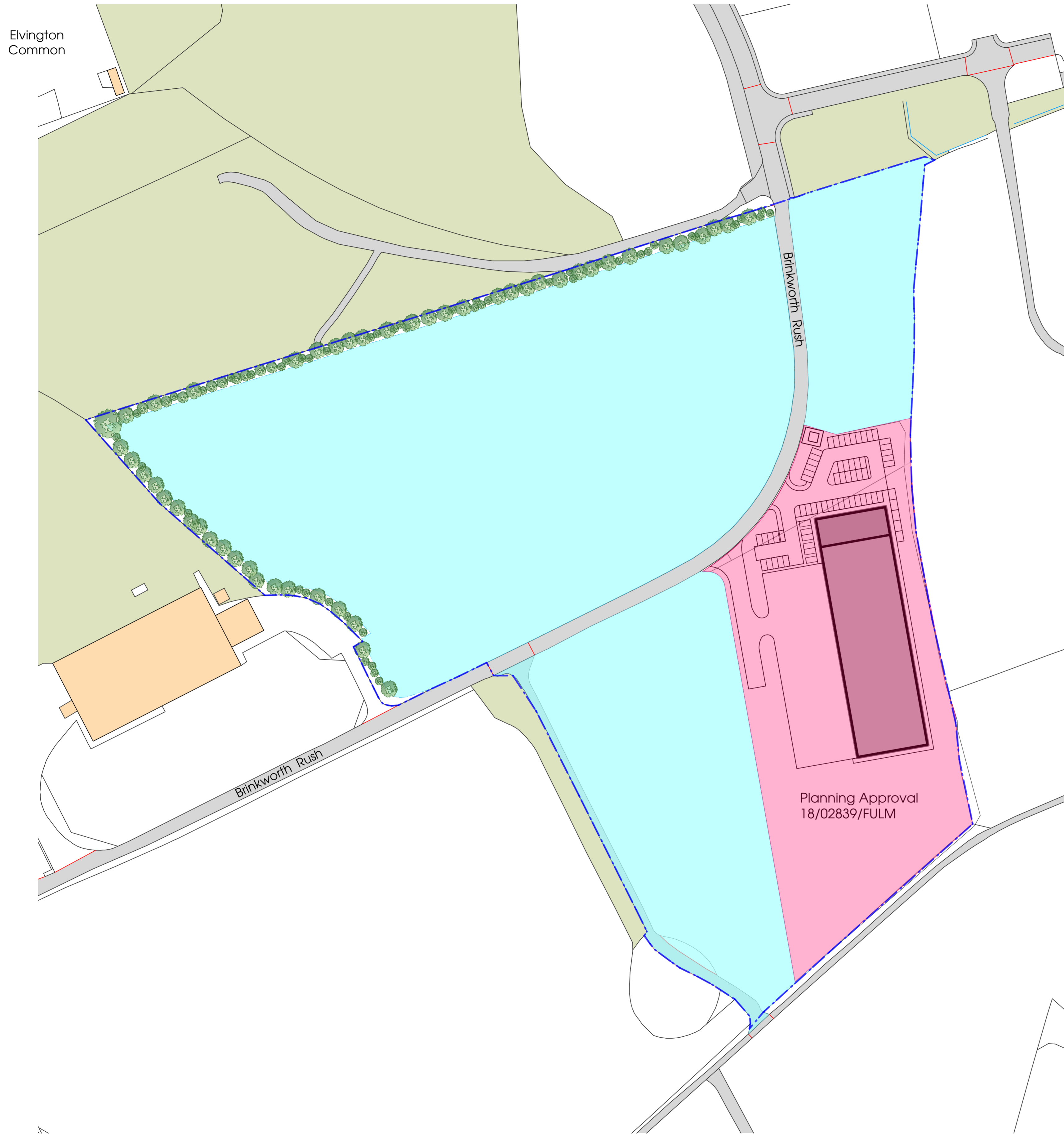
Drawing title

Alternative Site Positions : Areas

Drawn By REL Checked By TJC

Scale 1:1000 @ A1 Date 23.03.2023

Drawing no. 2337.PL414 Revision C



KEY:	Site Area	Floor Space	Yield
Allocated Site ST26	70,670 sqm	25,080 sqm	3,549 sqm/Ha
Planning Approval (18/02839/FULM)	16,160 sqm	3,924 sqm	2,428 sqm/Ha
Remaining Developable Area of ST26 (excluding boundary landscaping)	50,400 sqm	22,000 sqm	4,365 sqm/Ha

Rev	Date	Description	Drawn
C	27.03.23	Key alterations.	PJD
B	27.03.23	Key and boundaries alterations.	PJD
A	23.03.23	First Issue.	REL/TJC

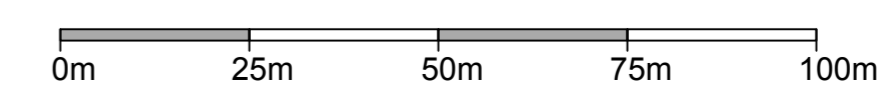
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Client
Pavers Ltd.

Project
**Proposed Unit,
Elvington, York.**

Drawing title
Alternative Site Position 3 : Areas

Drawn By **REL** Checked By **TJC**
 Scale **1:1000 @ A1** Date **23.03.2023**
 Drawing no. **2337.PL415** Revision **C**



1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

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Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The requirement to demonstrate effective marketing for a reasonable period of time and in most cases not less than 18 months is overly onerous. It conflicts with Local Plan policies R1, R2 and R3 which seek to protect the vitality and viability of the city centre and other district / local centres as well as policies which identify appropriate main town centre uses. This is on the basis that the revised wording applies the marketing requirement to **all** employment generating uses, not just office or industrial uses. So a vacant retail unit being converted for residential use (main town centre use) would be caught by this requirement as the policy is currently worded.

The 18 month marketing period goes beyond that of surrounding local authorities with a recently adopted plan (e.g. Harrogate Borough Council applies a 12-month requirement) and the advice from local agents is that a property that does not let within the first 12-month period is highly unlikely to let within the following six. For an applicant to demonstrate this at the planning application stage, the timeline from the marketing exercise beginning to the property being brought back into use could be upwards of 3 years i.e. 18 months marketing followed by a 6 month planning process and a 12 month redevelopment period. This would have a negative impact on the viability of any alternative development proposals, which could inhibit their ability to sustain other planning obligations including affordable housing and CIL. We suggest that the 18-month stipulation is removed from the policy and a caveat is introduced to enable a change of use / redevelopment of a site to occur provided within designated centres provided it is for a main town centre use

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input checked="" type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

MM4.8 is inconsistent with the revised wording of policy EC5. EC5 suggests temporary caravan sites will be permitted (subject to a specified criterion, and green belt policies) whereas supporting text states that “caravan sites are inconsistent with policy requirements to protect openness”

MM4.8 introduces ambiguity and is inconsistent with national and emerging policy requirements to protect openness and green belt exceptions that are not inappropriate development. MM4.8 should not pre-judge an assessment of openness in relation to the green belt.

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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



No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Polices Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Polices Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

We object to the policy requirement that "all major planning applications" must submit a detailed Air Quality Assessment. This is unnecessarily onerous and in practice would mean that some applications (e.g. small housing schemes of 10+ units) which are outside Air Quality Management Areas and will not result in Clean Air Zones do not require adverse effects on local air quality will still be required to submit a detailed Air Quality Assessments.

It is suggested that this requirement be amended to require a detailed Air Quality Assessment for "planning applications that have potential to generate significant air impacts" which would be consistent with the explanatory text for Policy ENV1 at Para 12.8.

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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



No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The modifications for ENV2 propose to omit the previous draft policy wording which related, in accordance with national planning guidance, to the need to avoid “significant adverse” environmental impacts from development proposals.

New text is proposed which would require all development proposals that may result in any “adverse” or “increased” environmental impacts (whether significant or not) to demonstrate how these issues have been considered in relation “to both the construction and life of the development”.

We consider that this is unnecessarily onerous, adding to the complexity and costs for planning submissions even where proposals would result in only very minor impacts. It is suggested that the policy wording should relate to development proposals which have the potential to result in significant adverse environmental impacts.

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input checked="" type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The cumulative impact of the modifications/ policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and as such it is unlikely to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Contrary to paragraph 173 and 174 NPPF (2012) viability has not been properly considered with regards to cumulative impact.

NPPF (2012) paragraph 173. states that "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable." Paragraph 174 states that "...Local Planning Authorities... should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle"

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input checked="" type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|---|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input checked="" type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The cumulative impact of the modifications/ policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and as such it is unlikely to provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Contrary to paragraph 173 and 174 NPPF (2012) viability has not been properly considered with regards to cumulative impact.

NPPF (2012) paragraph 173. states that "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable." Paragraph 174 states that "...Local Planning Authorities... should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle"

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input checked="" type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The policy title should be amended to “Policy R1: Town Centre Uses Hierarchy” to ensure consistency with the use class order, class E, and to avoid confusion
The policy title should be amended to “Policy R3: York City Centre Uses” to ensure consistency with the use class order, class E, and to avoid confusion. The supporting text only references class E rather referring to Sui Generis - drinking establishments and hot food takeaways, as well. This is an unjustified amendment which will inadvertently adversely affect the vitality and viability of the city centre and local businesses/ jobs which contrary to national policy and the draft economic strategy and the objectives of the emerging local plan

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input checked="" type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The policy title should be amended to “Policy R3: York City Centre Uses” to ensure consistency with the use class order, class E, and to avoid confusion. The supporting text only references class E rather referring to Sui Generis - drinking establishments and hot food takeaways, as well. This is an unjustified amendment which will inadvertently adversely affect the vitality and viability of the city centre and local businesses/ jobs which contrary to national policy and the draft economic strategy and the objectives of the emerging local plan

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input checked="" type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government's National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

Class E does not include drinking establishments or hot food take-aways which have now been removed as city centre uses since the policy only references class E rather referring to Sui Generis - drinking establishments and Hot Food Take-Away, as well. This is an unjustified amendment which will inadvertently adversely affect the vitality and viability of the city centre and local businesses/ jobs which contrary to national policy and the draft economic strategy and the objectives of the emerging local plan

This policy is not consistent with national policy. The policy is now inconsistent with the use class order and the definition of 'development' under s55 Town and Country Planning Act since retail uses are treated differently to other class E uses.

Suggested amendment – revise the wording to refer to the current Use Class Order e.g. Class E, and appropriate sui generis uses i.e. drinking establishments, and hot food takeaways

1. Survey Information

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.

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

Yes No

2. Register for consultation

* 2. Your name:

O'Neill Associates

* 3. Contact details:

Please provide email and/or address

Organisation (optional) O'Neill Associates

Address Lancaster House

Address 2 James Nicolson Link, Clifton Moor

City/town York

Post code YO30 4GR

Email address enquiries@oneill-associates.co.uk

* 4. 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 No

3. Your response

This formal stage of consultation is about the proposed Main Modifications, Policy Map changes, associated SA and HRA Addenda and new evidence documents. Modifications are put forward without prejudice to the Inspectors' final conclusions, and all representations made will be taken into account by the Inspectors. Therefore please note:

- Comments can only be made on the proposed Main Modifications, Policy Map Modifications, Sustainability Appraisal Addendum or Habitats Regulation Assessment Addendum
- **You may only comment on one modification or document at a time. To record multiple comments please repeat the survey. Further instructions for making additional comments will be given at the end of the survey.**
- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during the pre-submission Regulation 19 consultation undertaken between 21st February and 4th April 2018, Proposed Modifications Consultation 10th July to 22nd July 2019 or Proposed Modifications Consultation 25th May to 7th July 2021, the Inspector has considered these during the examination and there is no need to repeat these comments again.

* 5. To which consultation document does this response relate?

Please note, links shown beside each option are for associated documents.

- Proposed Main Modifications - [link](#)
- Proposed Policy Map Modifications - [link](#)
- Sustainability Assessment Addendum - [link](#)
- Habitat Regulations Assessment Addendum - [link](#)
- New evidence documents
- Sustainability Appraisal Technical Note (ST15a) - [link](#)
- Habitat Regulations Assessment Addendum (ST15a) - [link](#)

4. Proposed Main Modifications

* 6. To which section does this response relate?

- Section 2: Vision
- Section 3: Spatial Strategy
- Section 4: Economy and Retail
- Section 5: Housing
- Section 6: Health and Wellbeing
- Section 7: Education
- Section 8: Placemaking, Heritage, Design and Culture
- Section 9: Green Infrastructure
- Section 10: Managing Development in the Green Belt
- Section 11: Climate Change
- Section 12: Environmental Quality and Flood Risk
- Section 14: Transport and Communications
- Section 15: Delivery and Monitoring

5. Section 2: Vision

* 7. To which modification does this response relate?

- MM2.1 Paragraph 2.5
- MM2.2 Policy DP2: Sustainable Development
- MM2.3 Policy DP2: Sustainable Development
- MM2.4 Policy DP2 explanation - paragraphs 2.19a and 2.19b
- MM2.5 Policy DP4: Approach to Development Management

6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM3.1 Policy SS1: Delivering Sustainable Growth for York | <input type="radio"/> MM3.41 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.2 Policy SS1 explanation - new paragraphs | <input type="radio"/> MM3.42 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.3 Key Diagram | <input type="radio"/> MM3.43 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.4 Table 1a and 1b (housing supply and distribution) | <input type="radio"/> MM3.44 Policy SS12: Land West of Wigginton Road |
| <input type="radio"/> MM3.5 Policy SS1 Explanation - paragraph 3.3 | <input type="radio"/> MM3.45 Policy SS12: Land West of Wigginton Road 28 |
| <input type="radio"/> MM3.6 Policy SS2: The Role of York's Green Belt | <input type="radio"/> MM3.46 Policy SS12 explanation - paragraph 3.61 |
| <input type="radio"/> MM3.7 Policy SS3: York City Centre | <input type="radio"/> MM3.47 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.8 Policy SS4: York Central | <input type="radio"/> MM3.48 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.9 Policy SS4: York Central | <input type="radio"/> MM3.49 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.10 Policy SS4: York Central | <input type="radio"/> MM3.50 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.11 Policy SS5: Castle Gateway | <input type="radio"/> MM3.51 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.12 Policy SS5: Castle Gateway | <input type="radio"/> MM3.52 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.13 Policy SS5: Castle Gateway | <input type="radio"/> MM3.53 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.14 Policy SS5 explanation - new paragraph | <input type="radio"/> MM3.54 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.15 Policy SS6: British Sugar/Manor School | <input type="radio"/> MM3.55 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.16 Policy SS7: Civil Service Sports Ground | <input type="radio"/> MM3.56 Policy SS13: Land West of Elvington Lane |
| <input type="radio"/> MM3.17 Policy SS8: Land Adjacent to Hull Road | <input type="radio"/> MM3.57 Policy SS13 explanation - paragraph 3.64 |
| <input type="radio"/> MM3.18 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.58 Policy SS13 explanation - paragraph 3.67 |
| <input type="radio"/> MM3.19 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.59 Policy SS14: Terrys Extension Sites |
| <input type="radio"/> MM3.20 Policy SS9: Land East of Metcalfe Lane | <input type="radio"/> MM3.60 Policy SS15: Nestle South |
| <input type="radio"/> MM3.21 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.22 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.23 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.24 Policy SS9: Land East of Metcalfe Lane | |
| <input type="radio"/> MM3.25 Policy SS9 explanation - paragraph 3.48 | |
| <input type="radio"/> MM3.26 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.27 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.28 Policy SS10: Land North of Monks Cross | |
| <input type="radio"/> MM3.29 Policy SS10: Land North of Monks Cross | |

- MM3.30 Policy SS10: Land North of Monks Cross
- MM3.31 Policy SS11: Land North of Haxby
- MM3.32 Policy SS11: Land North of Haxby
- MM3.33 Policy SS11: Land North of Haxby
- MM3.34 Policy SS11: Land North of Haxby
- MM3.35 Policy SS11: Land North of Haxby
- MM3.36 Policy SS11 explanation - paragraph 3.56
- MM3.37 Policy SS12: Land West of Wigginton Road
- MM3.38 Policy SS12: Land West of Wigginton Road
- MM3.39 Policy SS12: Land West of Wigginton Road
- MM3.40 Policy SS12: Land West of Wigginton Road
- MM3.61 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.62 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.63 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.64 Policy SS16: Land at Tadcaster Road, Copmanthorpe
- MM3.65 Policy SS17: Hungate
- MM3.66 Policy SS18: Station yard, Wheldrake
- MM3.67 Policy SS18: Station yard, Wheldrake
- MM3.68 Policy SS18: Station yard, Wheldrake
- MM3.69 Policy SS18: Station yard, Wheldrake
- MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall
- MM3.71 Policy SS20: Imphal Barracks, Fulford Road
- MM3.72 Policy SS20: Imphal Barracks, Fulford Road
- MM3.73 Policy SS20: Imphal Barracks, Fulford Road
- MM3.74 Policy SS20: Imphal Barracks, Fulford Road
- MM3.75 Policy SS20: Imphal Barracks, Fulford Road
- MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington
- MM3.77 Policy SS22: University of York Expansion
- MM3.78 Policy SS22 Explanation
- MM3.79 Policy SS23: Land at Northminster Business Park
- MM3.80 Policy SS24: Whitehall Grange, Wigginton Road

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

- MM4.1 Policy EC1: Provision of Employment Land
- MM4.2 Policy EC1 Provision of Employment Land
- MM4.3 Policy EC1 explanation
- MM4.4 Policy EC1 explanation - table 4.1
- MM4.5 Policy EC1 Explanation paragraph 4.8a
- MM4.6 Policy EC2 Explanation paragraph 4.9
- MM4.7 Policy EC5: Rural Economy
- MM4.8 Policy EC5 Explanation - paragraph 4.17
- MM4.9 Policy R1: Retail Hierarchy and Sequential Approach
- MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
- MM4.11 Policy R3: York City Centre Retail

8. Section 5: Housing

* 10. To which modification does this response relate?

- | | |
|---|---|
| <input type="radio"/> MM5.1 Policy H1: Housing Allocations | <input type="radio"/> MM5.12 Policy H5: Gypsies and Travellers |
| <input type="radio"/> MM5.2 Policy H1, table 5.1 | <input type="radio"/> MM5.13 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.3 Policy H1 Explanation - paragraphs 5.4 to 5.16 | <input type="radio"/> MM5.14 Policy H6: Travelling Showpeople |
| <input type="radio"/> MM5.4 Policy H1 Explanation | <input type="radio"/> MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3 |
| <input type="radio"/> MM5.5 Table 5.2 | <input type="radio"/> MM5.16 Policy H5 and H6 Explanation - paragraph 5.42 |
| <input type="radio"/> MM5.6 Policy H2: Density of Residential Development | <input type="radio"/> MM5.17 Policy H7: Student Housing |
| <input type="radio"/> MM5.7 Policy H2 explanation | <input type="radio"/> MM5.18 Policy H7 Explanation - paragraph 5.47 |
| <input type="radio"/> MM5.8 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.19 Policy H9: Older Persons Specialist Housing |
| <input type="radio"/> MM5.9 Policy H3: Balancing the Housing Market | <input type="radio"/> MM5.20 Policy H9 explanation - paragraph 5.59 |
| <input type="radio"/> MM5.10 Policy H4: Promoting and Custom House Building | <input type="radio"/> MM5.21 Policy H10: Affordable Housing |
| <input type="radio"/> MM5.11 Policy H5: Gypsies and Travellers | <input type="radio"/> MM5.22 Policy H10 explanation |

9. Section 6: Health and Wellbeing

* 11. To which modification does this response relate?

- | | |
|--|--|
| <input type="radio"/> MM6.1 Policy HW1: Protecting Existing Facilities | <input type="radio"/> MM6.8 Policy HW3 explanation - Paragraph 6.20 |
| <input type="radio"/> MM6.2 Policy HW1 explanation - paragraph 9.5 | <input type="radio"/> MM6.9 Policy HW4: Childcare provision |
| <input type="radio"/> MM6.3 Policy HW1 explanation - paragraph 6.9 | <input type="radio"/> MM6.10 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.4 Policy HW1 explanation - paragraph 6.10 | <input type="radio"/> MM6.11 Policy HW5: Healthcare services |
| <input type="radio"/> MM6.5 Policy HW2: New Community Facilities | <input type="radio"/> MM6.12 Policy HW5 explanation - Paragraph 6.36 |
| <input type="radio"/> MM6.6 Paragraph 6.12a | <input type="radio"/> MM6.13 Policy HW6: Emergency Services |
| <input type="radio"/> MM6.7 Policy HW3: Built Sport Facilities | <input type="radio"/> MM6.14 Policy HW7: Healthy Places |

10. Section 7: Education

* 12. To which modification does this response relate?

- MM7.1 Policy ED1; University of York
- MM7.2 Policy ED1 explanation - paragraphs 7.1a (new) to 7.2
- MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e
- MM7.4 Policy ED2: Campus West
- MM7.5 Policy ED2 explanation - paragraphs 7.4, 7.4b and 7.5
- MM7.6 Figure 7.1
- MM7.7 Policy ED3: Campus East
- MM7.8 Policy ED3 explanation - paragraphs 7.6 to 7.12
- MM7.9 Policy ED5: York St. John University Further Expansion
- MM7.10 Policy ED5 explanation - paragraph 7.16
- MM7.11 Policy ED5 explanation - paragraph 7.18a

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

* 13. To which modification does this response relate?

- | | |
|---|--|
| <input type="radio"/> MM8.1 Policy D1: Placemaking | <input type="radio"/> MM8.9 Policy D6: Archaeology |
| <input type="radio"/> MM8.2 Policy D1: Placemaking | <input type="radio"/> MM8.10 Policy D6 Explanation |
| <input type="radio"/> MM8.3 Policy D2; Landscape Setting | <input type="radio"/> MM8.11 Policy D7: The Significance of Non-Designated heritage Assets |
| <input type="radio"/> MM8.4 Policy D3: Cultural Provision | <input type="radio"/> MM8.12 Policy D7 Explanation - paragraphs 8.35 to 8.37 |
| <input type="radio"/> MM8.5 Policy D4: Conservation Areas | <input type="radio"/> MM8.13 Policy D8: Historic Parks and Gardens |
| <input type="radio"/> MM8.6 Policy D4 Explanation - new paragraph 8.26a | <input type="radio"/> MM8.14 Policy D8 Explanation - new paragraph |
| <input type="radio"/> MM8.7 Policy D5: Listed Buildings | <input type="radio"/> MM8.15 Policy D10: York City Walls and St Marys Abbey Walls (York Walls) |
| <input type="radio"/> MM8.8 Policy D5 Explanation - new paragraphs | <input type="radio"/> MM8.16 Policy D13: Advertisements |

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

- MM9.1 Policy GI1 Green Infrastructure
- MM9.2 Policy GI2: Biodiversity and Access to Nature
- MM9.3 Policy GI2: Biodiversity and Access to Nature
- MM9.4 Policy GI2 explanation - paragraph 9.5
- MM9.5 Policy GI2 explanation - paragraph 9.6
- MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)
- MM9.7 Policy GI4: Trees and Hedgerows
- MM9.8 Policy GI5: Protection of Open Space and Playing Fields
- MM9.9 Policy GI5 explanation - paragraph 9.17
- MM9.10 Policy GI6: New Open Space provision
- MM9.11 Policy GI6: New Open Space provision
- MM9.12 Policy GI6: New Open Space provision

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

- MM10.1 Policy GB1: Development in the Green Belt
- MM10.2 Policy GB1 Explanation - paragraph 10.8
- MM10.3 Policy GB1 Explanation - new paragraph
- MM10.4 Policy GB2: Development in Settlements within the Green Belt
- MM10.5 Policy GB3: Reuse of Buildings
- MM10.6 Policy GB4: 'Exception' Sites for Affordable Housing in the Green Belt
- MM10.7 Policy GB4

14. Section 11: Climate Change

* 16. To which modification does this response relate?

- MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage
- MM11.3 Policy CC1 explanation - paragraph 11.8 - 11.11
- MM11.4 Policy CC2: Sustainable Design and Construction of New Development
- MM11.5 Policy CC2: Sustainable Design and Construction of New Development
- MM11.6 Policy CC2: Sustainable Design and Construction of New Development
- MM11.7 Policy CC2: Sustainable Design and Construction of New Development
- MM11.8 Policy CC2: Sustainable Design and Construction of New Development
- MM11.9 Policy CC2 explanation - paragraph 11.5
- MM11.10 Policy CC2 Explanation
- MM11.11 Policy CC2 Explanation
- MM11.12 Policy CC2 explanation - paragraph 11.18 - 11.23
- MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks
- MM11.14 Policy CC3 explanation - paragraph 11.28 - 11.34

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

- MM12.1 Policy ENV1: Air Quality
- MM12.2 Policy ENV1 Explanation
- MM12.3 Policy ENV2: Managing Environmental Quality
- MM12.4 Policy ENV3: Land Contamination
- MM12.5 Policy ENV4: Flood Risk

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

- MM14.1 Section 14 Introduction - paragraphs 14.2-14.3
- MM14.2 Policy T1: Sustainable Access
- MM14.3 Policy T1 explanation - paragraph 14.4
- MM14.4 Policy T2: Strategic Public Transport Improvements
- MM14.5 Policy T2 Explanation - paragraphs 14.15 to 14.23
- MM14.6 Policy T3: York Railway Station and Associated Operational Facilities
- MM14.7 Policy T4: Strategic Highway Network Capacity Improvements
- MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements
- MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities
- MM14.10 Policy T7 Explanation - paragraph 14.49
- MM14.11 Policy T8: Demand Management

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

- MM15.1 Policy DM1: Infrastructure and Developer Contributions
- MM15.2 Policy DM1 explanation – paragraph 15.13
- MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1
- MM15.4 Policy DM1 explanation – paragraph 15.21

18. Proposed Policy Map Modifications

Please note: Links shown beside the modifications are for the interactive modification maps on the City of York Council website.

* 20. To which modification does this response relate?

- PMM1 - ST15 (Policies Map South) [link](#)
- PMM2 - ST16 (Policies Map South) [link](#)
- PMM3 - ST32 (Policies Map City Centre) [link](#)
- PMM4 - ST35 (Policies Map North) [link](#)
- PMM5 - H22 (Policies Map North) [link](#)
- PMM6 - H23 (Policies Map North) [link](#)
- PMM7 - H56 (Policies Map North) [link](#)
- PMM8 - H59 (Policies Map North) [link](#)
- PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) [link](#)
- PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) [link](#)
- PMM11 - Strensall (Policies Map North) [link](#)
- PMM12 - Windy Ridge, Huntington (Policies Map North) [link](#)
- PMM13 - Jockey Lane (Policies Map North) [link](#)
- PMM14 - Land to the rear of Osbaldwick Village (Policies Map North) [link](#)
- PMM15 - Land at Hull Road, north of Grimston Bar (Policies Map North) [link](#)
- PMM16 - Acomb Water Works (Policies Map North) [link](#)
- PMM17 - Knapton Village (Policies Map North) [link](#)
- PMM18 - St. Peter's School (Policies Map North) [link](#)
- PMM19 - Homestead Park (Policies Map North) [link](#)
- PMM20 - Clifton Park Hospital (Policies Map North) [link](#)
- PMM21 - Burton Green Primary School (Policies Map North) [link](#)
- PMM22 - Nestle Factory (Policies Map North) [link](#)
- PMM23 - The Poppleton Centre (Policies Map North) [link](#)
- PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) [link](#)
- PMM25 - Pottery Lane (Policies Map North) [link](#)
- PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) [link](#)
- PMM27 - Derwent Valley Industrial Estate (Policies Map North) [link](#)
- PMM28 - Stockton on the Forest (Policies Map North) [link](#)
- PMM29 - York Cricket Club Boundary (Policies Map North) [link](#)

- PMM30 - Imphal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)

- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)

19. New evidence documents

* 21. To which evidence document does this response relate?

- EX/CYC/76 - Housing Supply Update 16 May 2022
- EX/CYC/76a - Housing Land Supply Update Addendum Responses to representations made to EX/CYC/76 21 June 2022
- EX/CYC/76b - Appendix 4 Part 1 - Major Sites with Consent
- EX/CYC/76c - Appendix 4 Part 2 - Major Sites (Allocations) Consent
- EX/CYC/76d - Appendix 4 Part 3 - Approved Communal Est Sites
- EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic
- EX/CYC/76f - Appendix 4 Part 5 - Allocations No Consent - Strategic Sites
- EX/CYC/76g - Appendix 4 Part 6 - Resolution to Grant
- EX/CYC/76h - Appendix 4 Part 7 - Communal Estabs No Consent
- EX/CYC/77 - Windfall Update Technical Paper 2022
- EX/CYC/79 - Phase 2 Infrastructure Note May 2022
- EX/CYC/86 - Green Belt Topic Paper 1 Annex 7 update 23 June 2022
- EX/CYC/87 - Local Plan Forecasting Report
- EX/CYC/87a - Local Plan Modelling Report
- EX/CYC/88 - Gypsy and Traveller Accommodation Assessment
- EX/CYC/89 - Sustainable Transport Study By Wood July 2022
- EX/CYC/91 - Comparative Effects Of Different Spatial Distributions
- EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022
- EX/CYC/99a - Viability Assessment of ST7 - July 2022
- EX/CYC/99b - Viability Assessment of ST14 - July 2022
- EX/CYC/99c - Viability Assessment of ST15 - July 2022
- EX/CYC/104 - Draft Climate Change Strategy June 2022
- EX/CYC/105 - Draft Economic Strategy June 2022
- EX/CYC/106 - Air Quality Annual Status Report June 2022
- EX/CYC/107/1 - Housing Trajectory Note August 2022
- EX/CYC/107/2 - Affordable Housing Note August 2022
- EX/CYC/107/3 - Student Housing Policy H7 Note August 2022
- EX/CYC/107/4 - SH1 Land at Heworth Croft Capacity Note August 2022
- EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022
- EX/CYC/119 - Retail Strategic Sites Briefing Note Nov 2022

20. Comment Form

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

- Support Object

The Examination Inspectors are required to consider whether the Local Plans have been properly prepared against tests set out in the Government’s National Planning Policy Framework (paragraph 182).

23. 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

24. 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.

The modifications for T8 require that development “should comply with the Council latest parking standards guidance”, and omits text which stated that the Council’s up-to-date parking standards would be contained in a ‘Sustainable Transport for Development’ SPD.

Given that the Council does not have any up-to-date parking standards, we considered that this reference should be omitted from Policy T8.

Modification Ref: **MM10.3**

Representation by O'Neill Associates

- 1 We object to the proposed modification.
- 2 The modification is contradictory. On the one hand it refers to the importance of gaps in built frontages and later refers to the desirability of consolidating groups of houses which are isolated from the main body of a village.
- 3 Overall, the modification seeks to interpret what is, or what is meant by infill. However, as presented in the NPPF, the assessment of whether a proposal would constitute infill development is matter of interpretation on merits of each case.
- 4 The modification is not compliant with the NPPF.

Suggested Change

- 5 MM10.3 should be **deleted** in its entirety.