



City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

All Pages ▼

Respondent #75 ▼



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Started: Monday, February 27, 2023 2:09:01 PM

Last Modified: Monday, February 27, 2023 2:16:59 PM

Time Spent: 00:07:58

IP Address: 81.104.212.153

Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

David Rowbottom

Q3

Contact details: Please provide email and/or address

Address

City/town

Post code

Email address

Q4

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

Yes

Page 3: Your response

Q5

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

Proposed Policy Map Modifications - link

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459 responses



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Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

To which modification does this response relate?

Respondent skipped this question

Page 7: Section 4: Economy and Retail

Q9

To which modification does this response relate?

Respondent skipped this question

Page 8: Section 5: Housing

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Page 9: Section 6: Health and Wellbeing

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To which modification does this response relate?

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

Q13

To which modification does this response relate?

Respondent skipped this question

Page 12: Section 9: Green Infrastructure

Q14

To which modification does this response relate?

Respondent skipped this question

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Respondent skipped this question

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

Q15

To which modification does this response relate?

Respondent skipped this question

Page 14: Section 11: Climate Change

Q16

To which modification does this response relate?

Respondent skipped this question

Page 15: Section 12: Environmental Quality and Flood Risk

Q17

To which modification does this response relate?

Respondent skipped this question

Page 16: Section 14: Transport and Communications

Q18

To which modification does this response relate?

Respondent skipped this question

Page 17: Section 15: Delivery and Monitoring

Q19

To which modification does this response relate?

Respondent skipped this question

Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

PMM18 - St. Peter's School (Policies Map North) link

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

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

Respondent skipped this question

Q23

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

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

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

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

Q24

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

PMM18 is not positively prepared because it is not consistent with sustainable development. The proposal fails adequately to consider the contribution of this land to flood mitigation or the consequences of removing development constraints in this area. PMM18 is neither justified nor consistent with national or local policy because it directly conflicts with the guidance on green belt - that it should preserve the special character of historic towns. The land at St Peter's contributes to the views of York's historic Minster and city and to the "green wedges" that are an essential shaping component of the City of York's unique historic character.

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Local Plan Consultation: Objection to PMM 18

- **Removal of St Peter's Playing Fields from Proposed Green Belt**

PMM18 fails to meet the tests for the sound development of policy in 3 areas:

1. **it is not positively prepared;**
2. **it is only very superficially justified;**
3. **and it is not consistent with national or local policy.**

1. PMM18 does not meet the requirement of the soundness test to be **“consistent with achieving sustainable development”** and thus **it is not positively prepared**:
 - The NPPF requires mitigation of and adaptation to climate change. PMM18 ignores this in removing these playing fields from the Green Belt. As these fields are Environment Agency Category 3 Flood Risk, the highest category, it is hard to conceive of any form of development on these fields which would not exacerbate the flood risk both from the Ouse and from the Burdyke which runs beneath one section of the fields.
 - Any more intensive use of these playing fields, for example as a commercial leisure facility, would also conflict with the “consistent with achieving sustainable development” test because it would be predicated on an increase in private car journeys rather than reliant on a modal shift to more sustainable transport forms as demanded by York's Local Plan and as demanded in the NPPF objective (paragraph 8) to move towards a low carbon economy.
 - The current usage of this site serves a client-base largely from outside the City of York. Paragraph 35 (a) discusses achieving sustainable development in addressing “unmet need from a neighbouring area”. Any change to the development status of the land affected by PMM18 risks exacerbating the private car journeys on which the current usage is predominantly based.
2. PMM18 does not meet the requirement of the soundness test to be **justified. It is only superficially justified**, driven almost entirely by defining a boundary, and fails to recognise the unique City of York characteristics of the site. It does not appear to consider other arguments relating to:
 - Paragraph 138 (d) of NPPF states that one of the functions of the Green Belt is to “preserve the setting and special character of historic towns”. It is undeniable that the green space at issue in PMM18 contributes in an important way to the special character of the City of York which is a cornerstone of the City of York Local Plan. This is set out clearly in SS1 where conserving and enhancing green corridors and areas with an important recreation function is a key part of preserving York's special character. The removal of this land from the Green Belt is not justified by arguments that recognise its contribution to historic character including views of the Bootham Conservation Area and Minster from the River

Ouse, riverside paths, riverside meadow and flood bank footpath. Removing Green Belt planning constraints is not justified in this sensitive location.

- The NPPF focus on sustainability and adaptation to climate change is not reflected in the treatment of PMM18 in relation to flood risk (see above) and is therefore not justified.
- The impact of the change of planning status on sustainability in areas like transport is likewise not considered. This again is a major lapse in argument because of the sensitivity of this riverside site of high historic value to the city's identity.

3. PMM18 does not meet the requirement of the soundness test to be consistent with national policy:

- Paragraph 138 (d) of NPPF states that one of the functions of the Green Belt is to “preserve the setting and special character of historic towns”.
- York's “green wedges” (TP1 4.3.12) as detailed in its Local Plan are key “shapers” (TP1 4.3.4) of its special character and any argument which fails to recognise the key importance of this site in preserving City of York's special character is not respecting the spirit and letter of the NPPF. Fig 4 of TP1 shows the importance of the area in PMM18.
- The area affected by PMM18 is characteristic of the area: it is low-lying, bordering the River Ouse and offering views of the Minster, historic city and Bootham Conservation Area. Narrowing the Green Belt here by about half, as PMM18 proposes, and consequently reducing planning constraints on development directly in the view of the Minster from the river corridor (potentially, for example, by the erection of floodlights) clearly does not reflect the objective of Green Belt set out in the NPPF.
- The recent raising of the height of the flood bank here has actually enhanced some views of the Bootham Conservation Area and Minster from the footpath along its top, and the openness on either side of the bank, partly within the area of PMM18, contributes hugely to this, and to the enjoyment of local residents and many visitors to the city who come precisely for this quality of experience.

I would argue that the decision to implement PMM18 is not sound. It is not positively prepared. It is not well-justified. And it is not consistent with national or local policy.



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City of York Local Plan Modifications Consultation 2023

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Respondent #254 ▼



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Started: Thursday, March 23, 2023 3:00:13 PM
Last Modified: Thursday, March 23, 2023 3:41:48 PM
Time Spent: 00:41:34
IP Address: 81.104.212.153

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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.

PMM18 is not well-prepared because it is not legally compliant. The comments of the planning inspectors in note EX/INS/43 are prejudicial to existing planning application 22/02288/FULM. PMMM18 clearly meets criteria 13, 14 and 15 of table NTS1.1 on page 5 of the Sustainability Appraisal Report Addendum which sets out the grounds for a Sustainability Appraisal, yet no appraisal was carried out on PMM18.

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PMM18 is not well-prepared because it is not legally compliant. The comments of the planning inspectors in note EX/INS/43 are prejudicial to existing planning application 22/02288/FULM. The inspector's references to "enclosures of significant height", "floodlighting" and "the nature and scale of the sporting facilities behind it [the flood defence bund]" refer to features of this planning application which has yet to be decided by City of York Council. His decision seems to be made without reference to the actual conditions on the site and without knowledge of them. There is a second procedural reason for objection. PMMM18 clearly meets criteria 13, 14 and 15 of table NTS1.1 on page 5 of the Sustainability Appraisal Report Addendum which sets out the grounds for a Sustainability Appraisal, yet no appraisal was carried out on PMM18. The flood risk category of the lands in question in PMM18 is the highest owing to risks from both the Ouse and Burdyke. Any future development on the field also risks generating a high volume of vehicle movements contrary to the provisions of City of York's Local Plan. On both the flooding and traffic grounds a Sustainability Assessment is very clearly necessary. An SA is also required because of the sensitivity of this site as part of York's historic riverside character. PMM18 is, therefore, not legally compliant because this has not been undertaken.