

Annex 6 Table 1: Summaries of comments received by respondent (please refer to the full copies of representations for details)

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
073	Private Individual	Section 10 Managing Appropriate Development in the Green Belt	GB4 'Exception' Sites for Affordable Housing in the Green Belt	Not legally sound as it does not comply with NPP on provision of TSP sites, which are inappropriate on green belt sites, 'The stables'. GB4 makes provision for small scale affordable sites, not meeting the PPTS definition of a Gypsy or Traveller to address need that may not be accommodated on strategic sites through policy H5.
073	Private Individual	Section 10 Managing Appropriate Development in the Green Belt	GB4 'Exception' Sites for Affordable Housing in the Green Belt	Not legally sound, (PM68) attempt to circumnavigate the law on TSP sites by classifying it as affordable housing" where appropriate", under NPP this is not appropriate.
073	Private Individual	Section 05 Housing	Site Allocation SP1	Not legally sound, (A4;102): Important that important that land outwith boundaries 1 and 4 remains open in order to aid the understanding of the historical relationship of the city to its hinterland", 'the stables' lies along this boundary toward main part of the village and allowing development there is thus illogical and legally unsound.
073	Private Individual	Section 05 Housing	Site Allocation SP1	Not legally sound, TSP site is not "non-time limited" to national planning inspectorates thus plan is not legally compliant. (A4:112) "non-time limited consent to use of land".

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073	Private Individual	Section 05 Housing	Site Allocation SP1	Not legally sound, (A4;106) "business park and the land extending beyond all boundaries is within a District Green Corridor (number 5)", 'the stables' is within green corridor and development for mixed purpose TSP sites is legally inappropriate. Whilst allocating site for TSP, against NPP, council clearly acknowledge site remain greenbelt which is unsound planning and contradicts NPP.
073	Private Individual	Whole Plan	-	No attention paid to view of locals.
073	Private Individual	Section 05 Housing	H5 Gypsies and Travellers	Massive housing delivered West of Elvington lane with the opportunity to place a site to accommodate all CYC's gypsy and TSP needs.
073	Private Individual	Section 10 Managing Appropriate Development in the Green Belt	GB4 'Exception' Sites for Affordable Housing in the Green Belt	Document unsound of internal content and illogical. The use of land West of Elvington Lane used to deliver massive housing was not explored as a site for Gypsy and TSP needs due TSP expressing preference for certain green belt site. And secondly CYC does not think people would want to move into houses in an area which contains gypsies or travelling show people and so does not wish to inflict them on that site.
073	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Village boundary set out on page A4:115 incorrectly identifies two areas of domestic housing as lying within Elvington Industrial Estate.

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073	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	Village boundary for Elvington begins at the entrance of Elvington Airfield as demonstrated by the sign set at that location. Thus the village of Elvington includes Brinkworth and the site known as 'the stables', which contains now illegal TSP occupation. As Brinkworth exists within boundaries of Elvington (EX/CYC/59F), states this is surrounded by countryside which needs to remain open, development on the stables site is illogical and contrary to CYC's own stated aims for the village. Reinforces the green belt site status of 'the stables', plan is unsound in evidence.
073	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Village of Elvington extends to encompass Brinkworth, the external boundary of the Greenbelt should extend that far and encompass and surround the airfield industrial estate, becoming contiguous with the airfield industrial estate that currently lies empty with little immediate need to further develop area.
073	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	The map on page 100 of EX/CYC/59F, shows the stables clearly lies outside area encompassed by the requirement for 2 or more services within 800m, which is marked for development on this basis. The initial reasoning for wanting development on the stables was to allow easy access to services, CYC's support for any application is illogical by it's own subsequent criteria for ease of access.
073	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Page 107 (A4:100) of EX/CYC/59F, states incorrectly that the village of Elvington is 1KM. Thus the supposition that purpose A4 is factually flawed.
073	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	EX/CYC/59F (page A4:101), states "Boundary 1 is therefore particularly important in preventing development coalescing with Elvington Industrial Estate". 'The stables' lies along this boundary with CYC regards as important to protect. Yet CYC is not enforcing a NNP inspectorate requirement to remove Travelling show people from that site. Issue of internal logic and legally unsound.

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073	Private Individual	Section 05 Housing	Site Allocation SP1	EX/CYC/59F (page A4:105) first paragraph, "To the north east of the business park, beyond boundary 1 and the access road into Brinkworth Hall, land is allocated to give non-time limited consent to use of the land as a plot for Travelling Showpeople (SP1). Although in close proximity, this is isolated development, disconnected from the business park, and has no relationship with the inset site. SP1 remains a green belt site". TSP site is not "non-time limited" in eyes of national planning inspectorate and thus not legally compliant.
073	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	TSP site is sprawl of the least attractive kind and should not be allowed within your own policy. (page A4:106) 'The entirety of the business park and the land extending beyond all boundaries is within a District Green Corridor (number 5)'. Thus the Stable site is within a green corridor and development for mixed purpose TSP is legally inappropriate. (page A4:112) Allocating this as a site for TSP, quite against NPP, council acknowledge site remains greenbelt, unsound planning and contradictory to NPP.
073	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(page A4:115) Map on SP5 incorrectly identifies two areas of domestic housing as lying within the boundaries of the "Elvington industrial estate". The conifers and Elvington Park are residential and part of the village.
073	Private Individual	Section 05 Housing	Site Allocation SP1	Removal of TSP site known as the stables, Elvington, as contrary to NPP and inspectorate decisions.
075	Heslington Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. General welcoming of the defined Green belt Boundaries. Perception of the Green belt could be further enhanced by viewing it not as an empty space, but as an active food producing belt. Rural areas of Heslington (PM87) sit within productive agricultural land, with potential of providing locally sourced food, impacting on carbon emissions as well as maintaining historic land use.

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075	Heslington Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Green Belt should be considered more as a food resource vital to the city, contributing to a reduction in carbon emissions as well as maintaining the historic agricultural setting of the city.
075	Heslington Parish Council	Whole Plan	-	The proposal has been prepared in line with statutory regulations, the duty to cooperate, legal procedural requirements such as the sustainability appraisal.
075	Heslington Parish Council	Whole Plan	-	Respondent considers the document to comply with the Duty to Cooperate. Proposal has been prepared in line with statutory regulations such as the sustainability appraisal and the council have followed the guidelines in its duty to cooperate - making the document readily available.
075	Heslington Parish Council	Section 03 Spatial Strategy	Site Allocation ST27	Respondent does not consider the document to be sound. Welcomes the reduction of site ST27 and the maintenance of Green belt status for the remains of the buffer zone between Campus East and Heslington village. However, concerns regarding the status of tarmacked / surfaced roads from built areas to development areas. Respondent highlights Low Lane between Heslington Village and ST27 as an example. It is important to maintain this as a no through traffic road - protection needs to be explicit in the Local Plan.
084	Private Individual	Section 05 Housing	Site Allocation H39	Preference of residents for development of H26 instead of H39 has been ignored

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084	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Land covered by site H39 determined by the 1992/3 Inquiry Inspector to serve Green Belt purposes as the site has value in protecting the character of the village and makes an important contribution to setting
084	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Provision of access to Site H39 would be difficult without harming the character of the village and amenity of residents as determined by the 1992/3 Inquiry Inspector
084	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Objection to the lack of recognition of Elvington as one cohesive place incorporating the Industrial Estate and Airfield Industrial estate - this cohesion is demonstrated by the developments of Elvington Park, the Conifers and Elvington Medical Centre (currently considered as part of Elvington Industrial Estate) shifting the centre of population and social focus westward along the B1228 from the historic core of "Elvington Village"
084	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Objection to Boundary 1 - H26 is a preferred location for expansion of Elvington as it would be behind woodland therefore creating zero visual impact, would not constitute ribbon development, children can safely walk to school and the site offers the opportunity to create social cohesion between what has been identified as the separate clusters of Elvington Village through suitable footpaths
084	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Object to Boundary 4 - challenge description of the northern section as following field boundaries from the mid-19th Century which are less apparent in the southern part - as no evidence found when consulting maps from late 19th Century and no evidence on the ground earlier than 20th Century

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084	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Object to Boundary 4 H39 - challenge assessment of permanence to existing southern section - existing boundary not insignificant, development further east (H39) would open up more land beyond the village up to Wheldrake Lane
084	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Object to Boundary 4 H39 - development here would impact on purpose 3 of the Green Belt to safeguard the Countryside from Encroachment. The boundary to the south of Beckside Estate (North of proposed H39) is ancient, substantive and visually opaque, land to the south of this (H39) has a strong relationship to the surrounding countryside and rural setting of Church Lane but not the main urbanised village,
084	Private Individual	Whole Plan	-	The document is not sound as not positively prepared - based on inherited opportunism where landowners have sought to offer sites (or not) and shows little evidence of collaboration with those who know the terrain
084	Private Individual	Whole Plan	-	The document is not sound as it is not justified - it does not take into account of proportionate evidence to alternative strategies in terms of site alternatives and conclusions are not fully justified
084	Private Individual	Section 05 Housing	Site Allocation ST15	The document is not sound as it is not justified - as no consideration has been given to the close proximity to ST15 on the character and access to the village of Elvington

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084	Private Individual	Whole Plan	-	The document is not effective - as the document is not fit for purpose as a high quality and sustainable way forward for the community and does not show sound judgement.
084	Private Individual	Whole Plan	-	Areas west of the school along the B1228 should be re-assessed in relation to the integrity of Elvington. The need for housing in Elvington, proposed sites and impact, should be re-examined in the context of the overwhelming nearby ST15 proposal. Effective communication should be engaged between CYC, Elvington Parish Council and villagers to make decisions based more on local knowledge and on-the-ground sensitivities, particularly in relation to site H39.
084	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Objection to the lack of recognition of Elvington as one cohesive place incorporating the Industrial Estate and Airfield Industrial estate - this cohesion is demonstrated by the developments of Elvington Park, the Conifers and Elvington Medical Centre (currently considered as part of Elvington Industrial Estate) shifting the centre of population and social focus westward along the B1228 from the historic core of "Elvington Village"
084	Private Individual	Section 05 Housing	Site Allocation ST15	The document is not sound as it is not justified - as no consideration has been given to the close proximity to ST15 (its design and location) on the character and access to the village of Elvington. Its close proximity to the entry of Elvington on the B1228 suggests that the development will lack a buffer zone from the village.
084	Private Individual	Whole Plan	-	Document as does not account for the views expressed directly by residents or their local Parish Councils due to little or no direct engagement.

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084	Private Individual	Section 05 Housing	Site Allocation ST15	Document is not fit for purpose – ST15 proposal takes up only about 14 pages in this specific document and considers this a totally inadequate amount of planning and consideration for approval of a development of this magnitude and impact.
084	Private Individual	Section 03 Spatial Strategy	Site Allocation ST15	Location of ST15 is not justified – position is too close to Elvington village and doesn't provide sufficient space between settlements and due to a lack of boundary justification, the proposed garden village will turn into a large town.
084	Private Individual	Section 03 Spatial Strategy	Site Allocation ST15	Proposed location of ST15 astride the airfield is not Positively Prepared, Effective or Justified – Objects to the boundary constraints as too weak and appear to be exaggerated – concerns that there are no boundary constraints along the length of the airfield itself.
084	Private Individual	Section 05 Housing	Site Allocation ST15	Concerns regarding environmental and economic cost of excavating and disposing of the existing runway.
084	Private Individual	Section 05 Housing	Site Allocation ST15	Document is not positively prepared – Lack of consideration presented regarding the impact upon Elvington – the magnitude of ST15 and quantity of housing is an argument against further development of housing in Elvington in an attempt to retain the character of the village as a truly independent rural settlement

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084	Private Individual	Whole Plan	-	Consideration to be given to all affected communities and groups, in terms of environmental and transport and traffic flows, with acceptable solutions put forward and agreed – requiring extensive consultation and positive engagement with representatives, such as Parish Councils
084	Private Individual	Section 05 Housing	Site Allocation ST15	Location of ST15 to be reviewed – The site boundary should be located where it can be an independent settlement and not adversely affecting any other villages, in particular maintaining a good distance from Elvington
091	Westfield lodge and Yaldara Ltd	Whole Plan	-	Respondent considers the document to be not sound, in relation to the Green Belt boundary 1 at Haxby.
091	Westfield lodge and Yaldara Ltd	Whole Plan	-	Respondent does not consider the plan to be sound. It fails on all four tests of soundness.
091	Westfield lodge and Yaldara Ltd	Section 03 Spatial Strategy	Site Allocation H37	H37/Site 6. With respect to compactness, the text incorrectly states that boundary 1 is bordered by an 'area preventing coalescence' (A4:144). This ignores the fact that site H37 which lies directly to the south of Boundary 1 is completely excluded from this area of coalescence as previously this same site was identified to be removed from the GB and identified for Housing. the allocation of Site H37 and the demarcation of the GB boundary would have no material impact on compactness of Haxby as originally proposed.

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091	Westfield lodge and Yaldara Ltd	Section 03 Spatial Strategy	Site Allocation H37	H37. With respect to landmark monuments, the exclusion of the site in question will have no material bearing on the perception of the siting and context of York Minster and its visual dominance over the landscape.
091	Westfield lodge and Yaldara Ltd	Section 03 Spatial Strategy	Site Allocation H37	H37. With respect to landscape & setting, the village of Haxby will still be freestanding and defined and not affect the setting of York. Defining the boundary around H37 will still create a clear and distinguishable boundary.
091	Westfield lodge and Yaldara Ltd	Section 03 Spatial Strategy	Site Allocation H37	H37. With respect to safeguarding countryside from encroachment, the village of Haxby already has existing development which encroaches into the countryside to the southeast.
091	Westfield lodge and Yaldara Ltd	Section 03 Spatial Strategy	Site Allocation H37	The proposed Boundary 1 on the southern edge of Haxby is illogical, given the Haxby gate ribbon development protruding southwards.
091	Westfield lodge and Yaldara Ltd	Section 03 Spatial Strategy	Site Allocation H37	Site H37 should be included in Policy H1 and that the detailed GB boundary is amended to exclude the subject site from the GB boundary.

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091	Westfield lodge and Yaldara Ltd	Section 03 Spatial Strategy	Site Allocation H37	In order to maximise the potential to deliver dwellings, particularly in the short term, to help meet the under-delivery of housing, site H37 should be excluded from the GB and re-allocated for 47 dwellings, as originally proposed.
102	Elvington Parish Council	Whole Plan	-	Opposes document CD13A that states meetings were held with Elvington residents - residents not properly consulted with views ignored.
102	Elvington Parish Council	Whole Plan	-	The evidence base presented is incomplete and inaccurate
102	Elvington Parish Council	Section 05 Housing	Site Allocation ST15	Original proposed sites for ST15 (provided by rep as a supporting document) is omitted which was generally more supported due to its limiting impacts on the biodiversity. Separation of original site is more consistent with green belt aims of preserving Elvington as a rural village.
102	Elvington Parish Council	Section 05 Housing	Site Allocation ST15	Site ST15 is not in accordance with the sustainable development principles. Proposed development for ST15 will have negative impacts on the Elvington Airfield which is a designated Site for National Conservation (SINC) for birds including Lapswing and Golden Plover's and species-rich grassland.

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102	Elvington Parish Council	Whole Plan	-	Does not consider the document to comply with Duty to Cooperate, considers Elvington Parish Council and the residents of the village have not been properly consulted. Document CD13A states that area-based meetings were held but this is incorrect.
102	Elvington Parish Council	Section 05 Housing	Site Allocation ST15	Site ST15 threatens York's historic environment, cultural heritage, character and setting as well as impacting the natural habitats that exist within the airfield - again threatening one of York's biggest attractions in Elvington Airfield.
102	Elvington Parish Council	Section 05 Housing	Site Allocation ST15	Does not consider the document to be sound as the presented evidence base is incomplete and inaccurate. Believes that Elvington would be adversely affected by the ST15 proposal and therefore the document is in conflict with National Policy Site ST15 as it would not converse of enhance York's historic environment, cultural heritage and character, whilst arguably destroying one of York's biggest attractions.
102	Elvington Parish Council	Section 05 Housing	Site Allocation ST15	Original ST15 site should be re-instated as this was consistent with national and local policies in terms of local cooperation and reduces this risk to biodiversity.
102	Elvington Parish Council	Section 05 Housing	Site Allocation ST15	Objects location of ST15 – Original location of the proposed site was generally supported by the residents and Elvington Parish Council as it is believed this site would cause less harm to the biodiversity of the area given the protected greenspace. Not enough separation between ST15 and Elvington – original location would retain Elvington as a rural village but new location leaves Elvington as a suburb of a new town, thus creating an urban landscape the plan seeks to avoid.

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102	Elvington Parish Council	Section 05 Housing	Site Allocation ST15	Do not believe the allocation of ST15 is in accordance with sustainable development principles – Document EX-CYC-62 Sustainability Appraisal (Modifications) states that ST15 will have a significant negative effect on the biodiversity of the area given that Elvington Airfield is identified as a SINC for birds and species-rich grassland.
114	Ian Henderson	Whole Plan	-	Respondent does not consider the document to be sound as it fails on the test of soundness with respect to justification.
114	Ian Henderson	Whole Plan	-	No consideration has been given to the effects of either Brexit or the pandemic on the whole scope of the local plan.
114	Ian Henderson	Whole Plan	-	The Census, the results of which may be known by the time of the hearing, should be considered.
114	Ian Henderson	Whole Plan	-	Local residents' views not just on the scope of housing need but on the whole effect on the environment of the city must now be taken into account far more than previously.

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118	Historic England	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Supportive of the proposed approach to simplify and clarify the methodology for delineating the proposed green belt boundaries.
118	Historic England	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The definition of 5 assessment criteria, each related directly to one of the three green belt purposes identified as relevant to York, provides a clear logical thread between the different stages of the methodology. The origin of the three criteria relating to Green Belt purpose 4 'to preserve the setting and special character of historic towns' lies in the Heritage Topic Paper. Compactness, Landmark Monuments and Landscape setting demonstrably contribute the special character of York to varying degrees depending on the location. Reducing the number of considerations referred to and being clearer about the purpose of each, through explanation of their relevance, has provided a stronger and simpler rationale for the extent of the green belt.
118	Historic England	Section 03 Spatial Strategy	Policies Map (Green Belt)	Acknowledge and support proposed amendments to the boundaries around the University in order to align with clearly defined features as consistent with national policy - but with amendments (see proposed modification)
118	Historic England	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 7 Boundary 7-8 are unchanged and it remains respondents view that Lakeside way would form appropriate boundary in accordance with the para. 8.47 of TP1
119	Environment Agency	Section 12 Environmental Quality and Flood Risk	-	No Policy added in relation to Water Framework Directive as requested in our Regulation 19 response (28 March 2018) and subsequently agreed in a Statement of Common Ground (SoCG) (6 December 2019) with the City of York Council (CoYC).

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119	Environment Agency	Section 12 Environmental Quality and Flood Risk	-	Add Water Framework Directive as requested in our Regulation 19 response (28 March 2018) and subsequently agreed in a Statement of Common Ground (SoCG) (6 December 2019) with the City of York Council (CoYC).
119	Environment Agency	Section 12 Environmental Quality and Flood Risk	-	Attended a Duty to Cooperate meeting with CoYC on 17 June 2021 and it was agreed that CoYC would address our concerns (Water Framework Directive) in line with the SoCG later in the examination process.
119	Environment Agency	Whole Plan - Strategic Flood Risk Assessment	-	Submitted Strategic Flood Risk Assessment (SFRA) is intended to supersede the previous version from 2013. Welcome the updating of the evidence base in relation to flood risk. Have some concerns with revised SFRA, in the context of the Local Plan we consider it sound. Raised these concerns at the Duty to Cooperate meeting and subsequently provided feedback to CoYC on the document directly.
122	York Racecourse	Whole Plan	-	Respondent considers the document to be broadly sound. Previous concerns regarding the lack of evidence underpinning the Green Belt Strategy and inconsistency in its proposed boundaries have been resolved, to the point the respondent considers the document to be sound.
122	York Racecourse	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to PM93, the respondent supports the removal of its developed area from the Green Belt however suggests amendments that would make this PM more sound.

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122	York Racecourse	Section 03 Spatial Strategy	Policies Map (Green Belt)	Failure to include the whole of the built footprint of the Racecourse will not support its sustainable development, contributing to valuable social, cultural and economic contributions within the city.
122	York Racecourse	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It would be prudent to exclude the whole of the main racecourse where future development is most likely to take place, particularly given that CYC's stated aim is to avoid having to further alter the GB boundary at the end of the Plan period 2033.
122	York Racecourse	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent agrees broadly with the comments set out in Topic paper 1, that the land to the west of the proposed boundary and beyond is identified as being of primary importance to the setting of the historic city as part of an historic stray. However, the respondent argues that this is not applicable to the developed footprint of the Weighing Room and adjacent buildings.
122	York Racecourse	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst the respondent supports the removal of its developed area from the Green Belt, the revised boundary should include the entire built-up area of the site rather than using the access road running through to define the boundary. Respondent proposes that the boundary should follow the outside edge of the racetrack along the western boundary. A revised boundary which excludes the whole of the developed footprint would make the plan sound, consistent with the five purposes of the GB set out in para 134 of the NPPF.
122	York Racecourse	Section 03 Spatial Strategy	Policies Map (Green Belt)	The developed footprint of the Weighing Room and adjacent buildings should be excluded from the GB.

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122	York Racecourse	Section 09 Green Infrastructure	GI6 Open Space Provision	Respondent supports the PM102 under Policy GI6.
122	York Racecourse	Section 09 Green Infrastructure	GI6 Open Space Provision	The wording of the revised Policy GI6 must make it clear that the land is used by the Racecourse operationally and that as a private, gated site it is not accessible as amenity space for the general public.
127	Private Individual	Section 05 Housing	Site Allocation H39	Plan is not positively prepared as site H39 is not based on comprehensively and consistently applied objectively assessed development and infrastructure considerations.
127	Private Individual	Section 05 Housing	Site Allocation H39	The plan strategy leading to the allocation of site H39 is not the most appropriate strategy when considered against alternative locations for this site.
127	Private Individual	Section 05 Housing	Site Allocation H39	Strategy leading to allocation of H39 does not deliver sustainable development in accordance with the policies in the NPPF.

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127	Private Individual	Whole Plan	-	Dissatisfaction with the nature of the consultation process and public engagement. Not user-friendly or transparent in terms of decision making. Assumption of high degree of IT competence. Not genuine public consultation.
127	Private Individual	Whole Plan - Sustainability Appraisal	Site Allocation H39	Location of Sustainable Development & Sustainability Appraisal City of York Local Plan: Preferred Sites Consultation Document (2016) notes claim H39 would reduce impact on climate change, but lack of published methodology so no more than an unsupported assertion. Planning and Environmental team does not explain how the development of this site would ameliorate climate change, particularly when Elvington has such limited local transport services and so distant from where people work and spend their money(compared with alternative sites). Great reliance on the use of private cars.
127	Private Individual	Whole Plan - Sustainability Appraisal	-	Plan Pre-Publication (Reg. 18 consultation, September 2017), the following was said: common practice for the Sustainability Appraisals is to select Sustainability Objectives and divide them into more detailed Sub-Objectives, providing consistent basis for testing the sustainability performance of proposed development sites. Removes some subjectivity otherwise inherent in appraisals at strategic level. No attempt has been made to weight the sustainability scores and performance of alternative housing sites. It must be the case some sustainability objective (e.g. maintaining openness and amenity of green belt are more important than others. This criticism applies equally to Wood City of York Local Plan: Sustainability Appraisal Report Addendum for the Proposed Modifications Consultation (June 2019).
127	Private Individual	Whole Plan - Sustainability Appraisal	-	Sustainability Appraisal (SA) Appendix 'G' Residential Sites paragraph 2.5 sets out SA criteria 1 to 4. They do not include "Green Belt" and this is an error of omission.

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127	Private Individual	Whole Plan - Sustainability Appraisal	-	SA methodology not fully explained in rational terms. Simply asserts sites must score 22 overall without explanation to why this cut-off is appropriate. Was it selected because the sustainability process would not otherwise identify sufficient land for development? If so this is hardly scientific in terms of protecting environmental capital. The methodology fails to incorporate weighting of the scoring according to relative importance of individual sustainability criteria. It is not realistic to assume all criteria of the same importance. For example, protecting and maintaining the openness of green belt should be given more weight than other criteria. In these respects, SA is not sufficiently objective.
127	Private Individual	Whole Plan - Sustainability Appraisal	Site Allocation H39	SA Appendix 'J' Managing Development in the Green Belt (GB1 to GB4). "potential negative effects" on the Green Belt (because of providing housing to meet local needs), does not explain what these negative effects would be. "monitoring [the effects of housing on the Green Belt] can be applied", without saying whether the monitoring will actually be carried out, or how, or when it will be carried out to have meaningful influence on SA. Given Green Belt status of Site H39 this is a significant omission. Proposed Modifications (2021) there is still no transparency about this monitoring, whether it has been carried out and if so the influence it has had on the Local Plan process.
127	Private Individual	Whole Plan - Sustainability Appraisal	-	SA Appendix 'K' policy topic- Location of Housing Growth (Page K103), sets out approach to development in the Green Belt , but given absence of Green Belt as a sustainability criterion there is no clarity over the influence of Green Belt in SA Appraisal process. Core Strategy Issues and Option, Option 2 (September 2007) states that when considering which area is most suitable for exclusion from green belt, it may be necessary to apply different tests to different circumstances. Goes against fundamental principle of SA, which is that all alternative housing sites should be appraised comprehensively and consistently against the same sustainability objective criteria, for fair comparison of sustainability performance of alternative sites.
127	Private Individual	Whole Plan - Sustainability Appraisal	-	The correct methodological approach is to apply the same tests to different circumstances at all alternative sites to assess their sustainability performance. (Page K108) referring to consultation responses to Local Plan Preferred Options (June 2015), states a mixture of objections to the wording of the Green Belt policy. Take the view that there was a lack of clarity, definition and consistency in application of Green belt policy by CYC within SA process.

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127	Private Individual	Whole Plan - Sustainability Appraisal	-	Local Plan Publication draft 2018, consultation form Part B Question 5.(4), we were concerned to note that our comments on the inadequacy of the SA in respect of Green Belt issues rather dismissively misrepresented and inadequately addressed within the LPPD process. SA is flawed and the LPPD is neither justified or sound. Wood City of York Local Plan Sustainability Appraisal Report Addendum – Proposed modifications Consultation (June 2019), addendum SA does not address or invalidate the above points
127	Private Individual	Whole Plan - Sustainability Appraisal	-	SA needs to integrate housing allocations and transport planning. Residents of Elvington are not well-served by public transport and the existing residents rely on the private car to get to work/shopping/leisure activities. Adding to the population in this location is not a sustainable development.
127	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Respondent believes Local plan fails the test of soundness. "Positively Prepared", allocation of site H39 is not based on comprehensively and consistently applied objectively assessed development and infrastructure considerations. "Justification", plan strategy leading to the allocation of site H39 is not the most appropriate strategy when considered against alternative locations for this site. "Consistency with National Policy" strategy leading to allocation of H39 does not deliver sustainable development in accordance with the policies in the NPPF.
127	Private Individual	Whole Plan - Sustainability Appraisal	Site Allocation H39	Green Belt City Of York Local Plan: Preferred Sites Consultation Document (2016), states: "the site represents a modest extension to the existing village of Elvington and would provide a logical rounding off of the settlement limits. Therefore, the site is not considered to serve greenbelt purposes." This statement pre-empted the emerging local plan which detailed green belt boundaries for the first time, and revealed prejudice against retaining the Green Belt at site H39. Rounding off of settlements might appear convenient, but does not negate the contribution of land thus lost from the green belt. Rounding of the settlements is not a sustainability objective, and variability of the urban fringe is a quality that contributes to the character of the landscape around the villages greenbelt. These points are supported by the notes to the consultation document, that states planning inspector had previously concluded that "this site served greenbelt purposes and that its development would radically alter the character of the village".

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
127	Private Individual	Whole Plan - Sustainability Appraisal	-	Wood City of York Local Plan: Sustainability Appraisal Report Addendum- Proposed modifications consultation (June 2019). Within the Sustainability Appraisal Addendum, the Sustainability Objectives for landscape make no reference to Green Belt. Potentially inconsistent and subjective analysis in respect of implications of Green Belt SA.
127	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	SP5 states Elvington village "does not contribute to openness of the Green Belt (page A4:81). However, parts of the village environs, like the land at H39, do contribute to openness of the greenbelt. Greenbelt purpose 1 (criterion 4) (page A4:86) refers to, "presence of low-density residential buildings [in the vicinity of site H39 (Site 95)] with a strong sense of openness", this is stated as an increase risk of "sprawl", but the green belt analysis fails to recognise that inner boundaries of H39 represent a soft boundary and gradual transition from agriculture to village, which is a valuable visual amenity. There's an existing, well established "landscape buffer".
127	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Green Belt purpose 1 (Criterion 4) (page A4:87) , "Towards the south-western extent of the village, land at the former rectory and adjoining farm has seen infill development; the presence of a number of similarly large, detached properties in extensive grounds south of Church Lane risks further sprawl occurring". It is not explained why detached properties, (which are otherwise said to contribute towards the strong sense of openness in this area (see Green Belt purpose 1, Criterion 4 are considered a risk of "further sprawl". Green Belt purpose 3 (Criterion 5) (page A4:88), "while there are a number of isolated detached properties positioned along Church Lane, their setting in extensive grounds or agricultural use gives surrounding land a predominantly open and rural nature, in contrast to the more densely developed village edge to the north....". Points to the existing visual amenity value of site H39 in this part of the green belt, which seems to have gone unremarked in the green belt analysis. An oversight, when Church lane is part of Wilberforce Way, a major recreational route used by many, including Elvington residents.
127	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Strategic Permanence. (page A4:90) refers to "meeting identified requirements for sustainable development when defining Green Belt boundaries.... and directing development to the most sustainable locations". It stated, "Land to all edges of Elvington has access to two or more services within 800, and therefore could potentially provide a sustainable location for growth." Not stating what these services are, there is also much more sustainable development than the convenient availability of services. Topic paper does not explain how building houses in green belt site H39 can be considered a sustainable development when Elvington has such limited local

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				services. Village is so distant from where people work and spend their money, with a reliance on private cars.
127	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Determining a Clear and Defensible Boundary, (page A4:95), “potential for the village of Elvington to grow within a sustainable pattern of development, to the southern extent of Boundary 4; the site represents a modest extension to the existing village of Elvington”. The Topic paper does not explain how building houses on the green belt at site H39 can be considered sustainable development or contributing towards a sustainable pattern (undefined) of development. Permanence of Proposed Boundary (page A4:98) refers to need to create "landscape buffers" to the western boundary of H39 allocation. This would be a consequence of building houses on land that currently has a strong sense of openness with an established soft boundary and gradual transition from agriculture to village, valuable visual amenity. The introduction of artificial "landscape buffer" for new houses would represent an obvious urban extension and loss of visual amenity.
127	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Topic paper is an exercise in working back from the answer, i.e. conveniently "rounding off" the green belt site H39. Unfortunately Annex 4 presents an unsubstantiated, contradictory and subjective analysis that ignores the value of the existing green belt transition into Elvington village that is currently enjoyed by many people. NPPF Para. 133 states, “the essential characteristics of Green Belts are their openness and permanence”. Analysis of H39 does not acknowledge the important contribution that this site currently makes toward openness in this part of Elvington. Para. 136 states, “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...”. The local plan process despite the complexity and volume, has not provided the evidence or justification for the proposed alteration of the green belt site H39. Para. 145 (e) refers to limited "infilling" in villages as permitted exception to the protection of green belt, but H39 would be visually apparent as an obvious urban extension.

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127	Private Individual	Whole Plan - Sustainability Appraisal	-	The omission of green belt protection as a Sustainability Objective from the Sustainability Appraisal is a flaw in the methodology applied.
127	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Other Densely Developed Areas in the General Extent of the Green Belt has to be carried out with a consistent approach to Green Belt issues in respect of all sites, and without prejudice against site H39 (Site 95).
127	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	HRA: preferred sites consultation document (2016), in response to this document we said H39 lies within 250m of the River Derwent, a Ramsar, SAC/SPA, and SSSI. Natural England's condition assessment in 2009 found the river in an unfavourable condition and the Environmental Agency is working with them to restore the river and its environs to a favourable condition. With H39 having the assumed occupancy rate of 2.4 people per household, a development of 32 houses and 77 new residents in the southern part of the village closest to the River Derwent. A significant number of people will use the footpath by the Church alongside the river, this will include additional dog waters. This will add additional pressures to the River Derwent.
127	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	Additional dog walkers using the footpath by the church alongside the River Derwent (Wilberforce way) causes concern of pet predation of wildlife in respect of Ramsar and European Habitats. 2021 household pet ownership (33% dogs/27% cats-Pet food manufacturers association). With the development of around 32 houses at site H39, 10 dogs and 8 cats would be introduced in addition to pets already in the area and those using the Wilberforce way. Dog walkers are likely to use the footpath from the church and allow them to run free on the floodplain of the Derwent. Dogs will chase wild animals, ground-nesting birds, introduce unwanted eutrophication by fouling. Studies on Thames Basin Heath SPA, Natural England recognises cats will roam within 400m of their keepers home, up to 1km. Most cats would be free to roam with the floodplain forming part of their territory, preying on mammals and birds. These additional pressures on the River Derwent are likely to work against the restoration of this habitat.

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127	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	<p>Preferred Sites Consultation Document (2016) we said site H39 likely to require a HRA to determine whether the development would have a significant effect on the RAMSAR/SAC/SPA. Carry out appropriate assessment under the HRA. Pre-Publication draft (Regulation 18 Consultation (September 2017) in response to this document HRA was carried out by consultants in respect of new housing developments of the River Derwent SAC and H39 was incorrectly screened out as having no conceivable effect on the condition of the SAC. (September 2017) HRA carried out at a high (i.e. generalised) level, issues of recreational pressure and pet predation were not properly addressed. screening test under the Habitats Regulations (Regulation 105(1) refers) states that “Where a land use plan.... (a) is likely to have a significant effect on a European site.... (either alone or in-combination with plans or projects).” Wilberforce Way is such an in-combination “project”. The Waterman report (page 7) goes on to say that “likely” in the context of a “likely.... significant effect” is “a low threshold and simply means that there is a risk or doubt regarding such an effect”. It is not clear what Waterman means by a “low threshold”, and “simply means”, but in general ecological practice, a precautionary approach is required for HRA screening for the protection of Ramsars, SACs, SPAs and SSSIs of national significance, like the River Derwent. The Waterman approach (“low threshold”, and “simply means”), is not precautionary. Table 5 (page 34) of the Waterman report shows that site H39 (Site95) has been screened out from the need to carry out an Appropriate Assessment because this allocation is “not likely to have an effect on a European site”. The table refers to “No conceivable effect on a European site”. This is an exaggerated overstatement, is not based on any factual evidence. It ignores the precautionary principle and the evidence of increased recreational pressure and pet predation we have presented.</p>
127	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	<p>Appendix B recognises site H39 is situated a few hundred metres from the River Derwent, but goes on to say “Even in such close proximity, localised effects associated with development can be ruled out.”. However no evidence has been put forward to support this assertion. “Given the lack of access locally, the proximity of the allocation is considered to be largely inconsequential. Even where access can be gained, the European site is largely confined to the channel and regarded as relatively resilient to public pressure.” Clearly misleading, no lack of access locally, the Wilberforce Way follows Church Lane and the public footpath beside the church down to the River Derwent. That the European site is said by Waterman to be “largely confined to the channel and regarded as relatively resilient to public pressure” is not said in the Appropriate Assessments carried out for policies SS13/ST15 (Wheldrake) and SS18/ST33 (New Garden Village, Elvington), therefore this so-called resilience does not apply to recreational pressure from site H39. Table 5 (page 35) recognises the likely significant effects on the River Derwent as a result of</p>

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				recreational pressure arising from policies SS13/ST15 (Wheldrake) and S18/ST33 (New Garden Village, Elvington), and Table 9 (page 136) states that “mitigation must be added” to these policies if pursued. Extensive mitigation measures considered to be appropriate for these sites by Watermann set out in Table 8 (page 102) not mentioned in respect to H39.
127	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	Summary in respect to H39 HRA Waterman report does not address with sufficient scientific certainty the potential effects of increased recreational pressures and pet predation on the designated features and conservation objectives of the River Derwent RAMSAR/SSSI/SAC/SPA. Waterman (“No conceivable effect”, “localised effects can be ruled out”, and the “inconsequential” proximity of site H39 (Site 95) demonstrate a dismissive, rather than precautionary approach. Appropriate Assessment was carried out for policies SS13/ST15 (Wheldrake) and SS18/ST33 (New Garden Village, Elvington), and mitigation measure proposed. H39 (Site 95) is closer to the River Derwent and would, combined with the Wilberforce Way subject the River Derwent to increased recreational pressure. It is untrue that H39 would have “No conceivable effect on a European site”, as asserted by Waterman, based on no evidence. The HRA is flawed, because an Appropriate Assessment has not been carried out on Site H39 and no mitigation has been considered, mitigation must be sufficient to remove all reasonable scientific doubt about the risk of potential effects, and the findings of an Appropriate Assessment require a high degree of scientific certainty.
127	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	The HRA should have included an evidence based Appropriate Assessment of recreational pressures and pet predation on the River Derwent statutory nature conservation site of international (Ramsar), European (SAC/SPA), and national (SSSI) significance.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Draft plan fails to address York's employment needs by not allocating or safeguarding sufficient employment land as part of the review of Green Belt boundaries. This is a major failing of the draft Plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the PM's to fail to address the shortfall of employment land identified in the draft local plan.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes the drafted Local Plan put forward is not the most appropriate strategy in terms of overall sustainability. Without comprehensive Green Belt review, reliable and up to date evidence base and subsequent analysis of employment allocations, it is not possible to properly conclude the Local Plan is justified, likely to be effective, positively prepared or consistent with the NPPF.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Draft Plan cannot be considered most appropriate strategy in terms of overall sustainability without a new comprehensive Green Belt review and subsequent allocation of further land to meet the identified shortfall in employment land needs. As submitted, it is not possible to conclude that the draft Plan is justified, likely to be effective, positively prepared or consistent with the NPPF.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	TP Addendum January 2021 does little to build upon the previous Addendum submitted or address concerns raised during the course of the examination of the Local Plan over methodology behind the Green Belt review for York. TP 1 Addendum and its subsequent Annex's is considered to provide selective review of York's Green Belt and retrospectively seeks to justify Local Plan strategy already adopted. CYC acknowledge that the growth planned in the Local Plan cannot be accommodated without a review of Green Belt boundaries but, as submitted, the Local Plan evidence base only includes a selective review of York's Green Belt, which has been carried out retrospectively to justify a pre-existing employment (and housing) strategy.
141	Oakgate Group PLC (Oakgate)	Whole Plan	-	CYC's approach only assessing selected allocations means that more suitable land has potentially been overlooked and it is not possible to conclude that the Local Plan can be put forward as the most appropriate strategy in terms of overall sustainability.

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141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers TP 1 Addendum fails to demonstrate how Council has assessed the Green Belt contribution of individual parcels of land and is absent of robust scoring system. They consider the Council to rely on historic and incomplete work on the green belt, including the 2003 'The Approach to the Green Belt Appraisal', 16 pages long, and subsequent 2011 update, which did not methodically review the 2003 Appraisal but was limited only to responding to comments submitted.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Only referral to the review of individual sites is within Annex 5 which assesses sites proposed to be allocated by the Council. There is no equivalent Green Belt assessment of discounted sites in the Council's evidence base which demonstrates that comparative analysis of reasonable alternatives has been properly undertaken.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the council to have a backward approach to the green belt, with the lack of availability of this data, and also the time period it has taken the Council to even prepare an updated Addendum with Annex's showing the Council's methodology which should have been readily available upon publication of the Local Plan (February 2018) but has instead taken over 3 years to formulate.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Considered a comprehensive Green Belt appraisal should be completed to allow for all reasonable alternatives to be considered. .
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	Policies Map (Green Belt)	Considered a comprehensive Green Belt appraisal should be completed to allow for all reasonable alternatives to be considered. Should include Land at Naburn (Naburn Business Park) which was assessed by the Council as not warranting inclusion in the Green Belt in 2003 and 2005 and only subsequently altered in 2011 for inclusion within the Green Belt following an objection from Fulford Parish Council with no comprehensive appraisal or justification.

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141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondents consider a comprehensive Green Belt review is necessary to ensure consistency with the spatial strategy and to ensure that the boundaries will not need to be reviewed again at the end of the plan period in accordance with NPPF para. 85. This is the same conclusion that the Inspector for the Leeds City Council Core Strategy reached in September 2014. This is particularly relevant in York because: a) it will be the first time that York's Green Belt has been properly defined; and b) the identified shortfall of employment land identified in Policy EC1.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers further Green Belt evidence submitted in the form of TP 1 Addendum, does not address previous concerns over the methodology behind site allocations and a comprehensive Green Belt review should be undertaken.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes the drafted Local Plan put forward is not the most appropriate strategy in terms of overall sustainability. Without comprehensive Green Belt review, reliable and up to date evidence base and subsequent analysis of employment allocations, it is not possible to properly conclude the Local Plan is justified, likely to be effective, positively prepared or consistent with the NPPF.
141	Oakgate Group PLC (Oakgate)	Whole Plan	-	Respondent does not consider the document to comply with duty to cooperate, no justification given.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Naburn Business Park (EX/CYC/59f_YDO boundary 1) In June 2019, planning application submitted to the City of York Council for a new business park on the site (application ref: 19/01260/OUTM). (Respondent include masterplan). The proposals will meet employment needs that have not been adequately addressed through the Local Plan, delivering 2,000 new jobs, an enhanced park and ride facility and better public access to the Green Belt. The application is yet to be determined.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers draft Plan fail's to address York's employment needs by not allocating or safeguarding sufficient employment land as part of the review of Green Belt boundaries. This is a major failing of the draft Plan. Draft Plan therefore cannot be considered most appropriate strategy in terms of overall sustainability without a new comprehensive Green Belt review and subsequent allocation of further land to meet the identified shortfall in employment land needs. As submitted, it is not possible to conclude that the draft Plan is justified, likely to be effective, positively prepared or consistent with the NPPF.
141	Oakgate Group PLC (Oakgate)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	To be found sound respondent considers, flaws should be remedied now, with the opportunity for informed participation. They believe this will require a new comprehensive Green Belt review and analysis of alternative options to meet employment (and housing) needs taking into account the current economic position of York in 2021. This would allow a detailed review of the deliverability of identified employment land and an assessment of the consequences of the proposed employment strategy on job creation to ensure that the Local Plan can be put forward as the most appropriate strategy in terms of overall sustainability. Without this analysis it is not possible to properly conclude the Local Plan is justified, likely to be effective, positively prepared or consistent with the NPPF.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	PM 16/17 -Policy EC1 (Employment Allocations), which seeks to deliver forecast employment land requirement of 231,239 sqm, including 107,081 sqm of office floorspace, over the plan period. Historic undersupply of office space in York, which has led to a vacancy rate of less than 2%1. The PM's to Policy EC1 are minor and relate only to the footnote and explanatory text for Proposed Employment Allocation E18 (Towthorpe Lines, Strensall). The land identified for employment therefore remains unchanged within the Local Plan by modifications proposed. Respondents therefore maintain that the Local Plan does not allocate sufficient office floorspace through the employment allocations identified. They reiterate that the Council are over reliant on York Central which accounts for 93% of the total office floorspace requirement and over 40% of all allocated employment land within the Plan. York Central is considered to have significant constraints, in terms of deliverability, but is also limited by the type of office floorspace it can deliver to the market.

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141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	PM's fail to reflect latest position at York Central and continue to overstate the amount of office space that can be delivered: Planning permission for York Central, approved in March 2019, includes between 70,000sqm and 87,693 sqm of office space. The majority of which (anticipated 76,762sq.m) is intended to be delivered within Phases 3-4 of the scheme's phasing plan with Phases 1 and 2 focused on the delivery of residential development. Phases 3 and 4 are set to be completed by 2033 and have start dates ranging between 2023 and 2026 (as of July 2021 no reserved matters applications have been submitted as of yet relating to office development). Proposed allocation for York Central in the draft Local Plan is for 100,000 sqm. This means at York Central there will be a shortfall of at least 12,000 sqm, and potentially up to 30,000sqm, of office floorspace against the draft Local Plan allocation. This is alongside, very little Page 3 delivered in the early stages of the plan period (anticipated 8,525sq.m within Phase 1) with the majority focused within Phase 3 and 4.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Respondent considers PM's don't alter the fact that there are no other allocations included in draft Local Plan that include a specific requirement for office floor space. Each of the other remaining allocations within the draft Local Plan therefore only include for the potential for some B1 floorspace. There is no guarantee that office floorspace will be delivered at these remaining sites as ancillary to other uses which means combined with the shortfall at York Central, there is potentially 37,000sq.m of office floor space unaccounted for in the draft Local Plan.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	In respondents hearing statements prepared in December 2019 (Appendix IV) each of the remaining office employment allocations have in addition been analysed based upon land ownership and tenancy which further demonstrates that the likelihood of office floorspace being delivered on these sites is severely limited.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Since preparation of these hearing statements, an application at Northminster Business Park (Ref:21/00796/FULM) has been approved with further substantiates respondent statements made previously and highlights failure to provide office floorspace on allocated land. Northminster Business Park is allocated under Policy EC1 as ST19: Land at Northminster Business Park for 49,500sq.m of employment floorspace. The suitable employment uses for this site as set by the draft Local Plan include B1c, B2, B8 and an element of B1a. The application determined for this site at the CYC July 2021 committee nonetheless only approves permission for a 5,570sq.m distribution centre (Use Class B8). This application therefore demonstrates the highly

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				likely scenario that outside of the York Central, limited office floorspace will actually be realised in the remaining employment allocations with a key focus of these sites falling within B2 and B8 uses.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Respondent states, Naburn Business Park includes 25,000sqm of office floorspace, they consider that this could help plug office floorspace gap they have identified in the draft Local Plan. An application has been submitted to CYC, which is supported by an EIA and a suite of technical documents which demonstrates how the proposals represent sustainable development, which could be delivered immediately to meet York's unmet employment needs.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Employment allocations in draft Plan, respondent believe should identify a mix of sites to reflect needs of different markets and occupiers (who will have differing locational drivers). York Central will be desirable location for some office occupiers, but it will not suit the needs of those sectors with a higher dependency on occupiers who need quick access to the road network (either for commuting or for business reasons). Other types of occupiers may also prefer a campus style business park environment to a city centre location for reasons of security or privacy, for example headquarters of large businesses, defence organisations and data centres, which the Naburn Business Park is designed to the meet the needs of.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Respondent maintain, Policy EC1 is not justified, is unlikely to be effective, does not represent positive planning and is not consistent with the NPPF. Policy EC1 should therefore be re-addressed taking into account the recent positions on each of the allocated sites and should allocate further employment sites to address the shortfall in office floorspace.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Policy EC1 should take into account the recent positions on each of the allocated sites and should allocate further employment sites to address the shortfall in office floorspace.

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141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	York Economic Outlook report aims to provide update to 2015 results which were used to underpin the Local Plan. It is stated that the update is to understand the current outlook for York and assess whether there has been any significant change to the forecast since Local Plan was produced. Respondent consider, the Council have taken some significant time to respond to all outstanding matters and queries raised during the Hearings Stage 1 in December 2019 and are now in a position whereby this document is again out of date. The evidence base which underpins the Local Plan therefore does not account for the past year and a half which more importantly than just the passage of time, does not reflect one of the most pivotal periods of time for the world's economy due to the impact of Covid-19. It consequently cannot be said that the evidence base for the Local Plan, and most certainly this document, is reliable and it is not possible to properly conclude the Local Plan is justified, likely to be effective, positively prepared or consistent with the NPPF as a result.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	An up to date, reliable economic evidence base is imperative to the Local Plan for various reasons but in particular when it comes to assessing the employment land allocated within the Plan. Impossible to ensure only the most suitable and sustainable sites for employment have been chosen if the Council does not have a clear steer on the economy within York and where this is likely to be heading over the course of the Plan period.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Para. 80 NPPF state planning policies and decisions should help create conditions which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity . The Plan for York should therefore set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth , enables a rapid response to change in economic circumstances and will meet anticipated needs over the Plan period (Para. 81, NPPF). In accordance with Para. 82 of NPPF the Plan should also recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations .

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141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Updated Economic Outlook report should thus be produced to inform the Local Plan and in particular Policy EC1 so that the sites allocated for employment can be assessed as to whether these are still most suitable and sustainable sites for York's economy and market sector going forward. It will be critical to understand whether the correct amount of floorspace has been allocated to kick start the economy and also whether correct locations have been chosen based upon the impacts of Covid-19 and the sectors currently seeking to invest.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Respondent considers it clear that the demand for office space within the centres of cities has slowed as a result of Covid-19 and a key focus for all cities, including York, will be about ensuring sites are available in alternative locations to continue to attract and retain business in the city for those who may prefer sites which are located outside the centre and are better connected to good transport links.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	In relation to general business/workspace demand that the industrial warehouse and distribution sectors continue to demonstrate high levels of demand nationally, regionally and locally. Employment land and building availability in York in this sector is currently only restricted to handful of smaller sites going forward and thus the potential to capture jobs and investment from the larger internet based manufacturers/business's and distributors for York are currently limited.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Taking Proposed allocations at Northminster Business Park, Annamine Nurseries site and Poppleton Garden Centre which would be only sites which could in theory support these companies going forward, it is proving impossible to see how these sites could cater for this growth. The Annamine Nurseries site is reserved by the Shepherd Group exclusively for potential future use by their Portacabin business, the Poppleton Garden Centre is in full use by owner occupier Dobbies and the Northminster Business Park is focused on B8 uses with no current plans for office space. As an example, respondents are aware that Pavers Group have been looking for 20,000 sq ft of office building with a preference for the South of the City. Respondents then take this company therefore as a case study of a successful and expanding York based manufacturing and internet sales group, then expansion options to bring together their sales & distribution services are extremely limited in York. These business's need floor and site area to work efficiently together with good road and infrastructure connectivity which is not currently provided by any of the allocations in the Local Plan. Resultantly, businesses like Pavers could consider a relocation in the medium term to cities such as Leeds

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				which would result in lost business for York and cut the city off from further, desperately required, investment in this sector.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Naburn Business Park would provide a range of choice for variety of occupiers, which reflects the fact that city centre space at York Central will not meet needs of all occupiers, particularly cost sensitive SMEs and businesses that need good access to road network (for example industrial warehouse and distribution companies). Naburn site will therefore be attractive to current market in light of Covid-19, being well located for road network, accessing skilled workforce and capable of providing a high quality business park environment and would help to address not only the quantitative shortfall in office floorspace as highlighted previously in these representations but the qualitative lack of alternative office locations outside of the centre of York.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	The PM's fail to address the shortfall of employment land identified in the draft Local Plan.
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Council s PM's fail to reflect latest position at each of the office employment allocation as identified by Policy EC1 in particular York Central and continue to overstate the amount of office space that can be delivered.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
141	Oakgate Group PLC (Oakgate)	Section 04 Economy and Retail	EC1 Provision of Employment Land	Economic evidence base for Local Plan, Economic Outlook 2019, out of date and does not take into account the critical impact of Covid-19 on York's economy and the shift in the market to inform suitable and sustainable employment allocations. An updated Economic Outlook report should be published.
160	CPRE North Yorkshire (CPRENY)	Whole Plan	-	Respondent considers document to comply with Duty to Cooperate. Respondent considered the amended DtC document and consider the GB addendum document has been properly consulted on and prepared following consultation and work with neighbouring authorities, statutory consultees and interest groups.
160	CPRE North Yorkshire (CPRENY)	Whole Plan	-	CPRENY consider document to be sound, meeting the 4 tests as set out in the NPPF.
181	Gateway Development	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Does not consider the document to be sound. Insufficient land is being released from the Green Belt to meet housing need. The approach to the Green Belt fails to reflect exceptional circumstances for the release of land.
181	Gateway Development	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 8 Boundary 34/PM95 – Alternative Site 220 to the south of the proposed boundary should be included within the urban area.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
181	Gateway Development	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 220) Land at Sim Balk Lane south of York College should be removed from the Green Belt Boundary.
181	Gateway Development	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Does not consider the document to be sound. The plan fails to meet the true housing needs for the city of York and therefore the allocation of Site 220 is necessary to fulfil this.
181	Gateway Development	Section 05 Housing	H1 Housing Allocations	Allocation of site 220 as an area for residential purposes to fulfil the housing need of the city
181	Gateway Development	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Policy SS1 fails to meet the level of housing require in York over the plan period and is not effective, not justified and not consistent with national policy as it will fail to meet the NPPF approach to housing delivery and particularly to significantly boosting the supply of housing.
181	Gateway Development	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There is an undue level of reliance on the 2018 household projections

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
181	Gateway Development	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Current annual provision of homes in the plan does not account for the application of the standard method. Does not account for the need for 573 affordable homes per annum
181	Gateway Development	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Current annual provision of homes in the plan does not account for historically low delivery of affordable housing of less than 10% of completions.
181	Gateway Development	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan should provide a minimum of 1026 dwellings per annum
181	Gateway Development	Section 03 Spatial Strategy	Policies Map (Green Belt)	Green Belt boundary should be repositioned (site 220) to the south of the school playing field and along the A64 eastwards to the point in which it intersects with Sim Balk Lane
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. Fails to meet the full OAHN.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Increase the housing requirement. otherwise recommend that upon adoption a review of the Local Plan is immediately triggered.
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Recommended that the housing requirement is increased to reflect the most up to date Standard method. The HNA includes the 2020 Standard method calculation at 1,026 dpa.
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In order to make the local plan sound, the Housing Requirement in Policy SS1 is increased to a minimum of 1,013 in line with the Standard Method Local Housing Need calculation.
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent continues to recommend that the current supply of 512 units is annualised over the first 5 years of the Plan rather than over the plan period.
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. Issues with the methodology; inadequate justification for inclusion of land west of chapelfields in the Green Belt.

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182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In relation to landmark monuments - not all views of Minster contribute in the same way - not every single view of the Minster being significant or worthy of protection or contributing towards the understanding of the historic core. Methodology is not robust in identifying Green Belt boundaries that would serve the function of purpose 4 of GB.
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Lack of explanation for the derivation of the boundaries. Not clear how the boundaries have been decided - no explanation. In particular in the context of land west of Chapelfields.
182	KCS Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	Lack of consideration of the potential development put forward and the potential for an alternative boundary which allows for appropriate development to be accommodated in the longer term.
182	KCS Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	No consideration of proposed development put forward by interested parties - land at chapelfields has been submitted in great detail identifying a potential developable area but this does not appear to have been considered in the assessment of defining detailed boundaries.
182	KCS Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Methodology does not define parcels of land and so is unable to quantify how much land extending from the suburban edge should be kept open to safeguard against sprawl, encroachment.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
182	KCS Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	Designate land west of Chapelfields outside the Green Belt.
191	Private Individual	Whole Plan	-	Respondent does not consider document complies with Duty to Cooperate, believes no true consultation has taken place with the residents and elected representatives of Elvington.
191	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	EX/CYC/59f - Elvington Airfield Business Park (page 112) green belt proposal inconsistent and at odds with proposal elsewhere in draft document. Later papers retain SP1 within green belt where as other papers in overall plan documents propose its removal from the greenbelt. Believes its correct to retain within the greenbelt.
191	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Should SP1 not remain in the green belt, then they request that in the interest of equality and non-discrimination, then the adjoining residential properties (Oaktrees, Brinkworth Hall, Brinkworth Park House, The Old Coach House and Brinkworth Lodge and for consistency Hazel Lodge) are also removed from green belt.
191	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	SP1 remaining in the green belt ceases to be an acceptable use of green belt under various items of legislation and national policy and thus, should itself, be removed from the plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
191	Private Individual	Section 05 Housing	Site Allocation SP1	SP1 to be removed from the entire plan.
192	Selby District Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Discussions have been ongoing between Selby District Council and the City of York Council throughout preparation of the Local Plan. Agreement that both Selby and York will meet their own objectively assessed housing need within their own authority boundaries. This position has been formalised by Selby (and York) and all other Local Authorities comprising the Leeds City Region through the Leeds City Region Statement of Common Ground (March 2020).
192	Selby District Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The unique geography of the City Region determines that partner Councils have a close, but not dependent, relationship on each other for accommodating housing need/ That each Local Planning Authority is planning for their own needs within their own boundaries. For the avoidance of doubt this means that there is no housing shortfall or distribution of unmet need required. New evidence base produced for the City of York Council includes a housing figure of 822 dwellings per annum (Housing Needs Update, September 2020). This differs significantly from the standard methodology figure of 1,026 dwellings per annum. In light of the new evidence base, the standard method and York's complex housing supply position and to ensure that the agreed position of meeting need is delivered, it is essential that the Inspectors are confident that City of York can meet their own housing need within their own authority boundary. Whilst we are aware that City of York Council are being tested under the NPPF transitional arrangements, Selby council wish to seek assurances that City of York Council are able to meet their future housing needs without impacting on Selby District.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers Council failed to apply its own methodology in assessing housing sites for potential site allocation through the site selection process. Failure of the Council to undertake a proper, objective assessment of the sustainability of sites coming forward for potential allocation fails to meet the requirements of national planning policy and renders the plan unsound. Furthermore, the Council has failed to provide justification for its methodology relating to the upper site size threshold (35ha) leading to a flawed evidence base and unsound Sustainability Appraisal.

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199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Council identified how Green Belt was assessed at the start of the plan process, but then either failed to make the results sufficiently clear to follow, or simply ignored the findings when allocating land for development. Alternative is that the Green Belt assessments were insufficient as they only considered existing development and they were never designed to help to guide where development might be acceptable in the future. This means that there are allocations that do not follow the guidance which is set for existing development and there is no logic to the process. Similarly, whilst it is noted that Green Belt boundaries should follow established physical boundaries, in a number of cases they follow lines that have been drawn across fields where there is no physical boundary and there never has been a physical boundary even in the past. Some boundaries are following the field boundaries, are also not acceptable as there are no physical features apart from the division between crops. The result is a Plan which fails to give sufficient weight to existing Green Belt land and will not give sufficient protection to Green Belt land in the future due to poorly considered decisions during the plan process.
199	Private Individual	Whole Plan	-	Plan is fundamentally flawed. The only reasonable action that should be taken is a complete restructure of the Plan and to start again in the Plan making process
199	Private Individual	Whole Plan - Sustainability Appraisal	-	2014 NPPF (Para.165) makes clear that 'planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area'. This paragraph also suggests that the sustainability appraisal should be integral and should 'consider all the likely significant effects on the environment, economic and social factors'.
199	Private Individual	Whole Plan	-	Para. 167 indicates assessments should be proportionate but should be started early in the plan-making process. Para. 169-170 also indicate that the Historic environment should also be considered, as well as landscape character assessments, particularly 'where there are major expansion options assessments of landscape sensitivity'.

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199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Green Belt updates provided in January 2021 and addendums produced in May 2021 suggest that the Green Belt work was carried out prior to the plan production, despite not being produced until 2021.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Defining Green Belt' produced in January 2021 sets out how the Green belt was taken into consideration in shaping the preferred options stage. Para. 4.58 indicates that a 'balanced' approach would be taken, to protect and enhance the city's built natural environmental assets, avoiding significant negative effects and delivering economic growth. As a result (para. 4.61) Option 1 of spatial distribution of growth was taken forward which would prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement. It is therefore not surprising that the Wiggington Road site (ST14) was, at the preferred option stage, clearly designed to be an extension to the urban area, and the one new settlement was ST15.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Having allocated sustainable urban extension, that would provide a significant level of population that would support services and was connected to existing services and facilities inside the ring road. However, having failed to realise that it was precluded by the apparently identified need to retain open land around the main urban area, it might be thought that this should have triggered a significant reconsideration to be made.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Green Belt update papers produced in 2021 aim to demonstrate that the Green Belt was properly assessed before plan was submitted. However, analysis demonstrates that either the documents did not say what the 2021 documents suggest, or that this was ignored in the early allocations in the plan. This led to a fundamental problem i.e. the urban area of York being extended beyond the ring road at ST14.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Highlights the flaw in the process which allowed only the Green Belt importance of land in relation to existing development to be considered. This meant that sites were allocated on Green Belt land that did fulfil important purposes of Green Belt (as the redrawing of ST14 indicates) because parts of the Green Belt where development was being considered were not assessed for importance before sites were allocated.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	These mistakes are compounded by the failure to follow the clear principles set out in their own documentation on the setting of new Green Belt boundaries, with boundaries being set that have no physical features, and some that do not even follow historic field boundaries.
199	Private Individual	Whole Plan - Sustainability Appraisal	-	Respondent refers back to their previous representations submitted on behalf of Mr J Harrison, the general principle of York's Sustainability Appraisal appears to be sound but the document(s) have been produced on the basis of a flawed evidence base and so cannot reasonably come to the correct conclusions in terms of assessing and testing of reasonable alternatives. This continues to be the case despite the further evidence and justification produced as part of the Council's audit trail document, which cements our thoughts entirely. The Sustainability Appraisal and therefore the Plan itself is flawed and unsound on that basis.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Table 1 respondent provided has a timeline of documents produced to support the preparation of the Local Plan in relation to the Council's site selection methodology . It identifies the threshold site size used at that point in time to determine the sites to be fast tracked through the site selection process due to their apparent capability of accommodating on site facilities and services. The table also shows how the preparation of the various documents sits alongside the consultation exercise undertaken in respect of the Publication Draft Local Plan and the submission date of the Local Plan for Independent Examination.
199	Private Individual	Section 05 Housing	H1 Housing Allocations	Acknowledged that amendments to the Local Plan can be made following the final consultation and prior to submission for Examination, the site threshold used in the preparation of the Local Plan is particularly important and should have been in place and correct throughout the Plan making process. Throughout the entire course of the preparation of the Local Plan, the threshold for larger sites exempt from the criteria based assessment has been 100ha. Only at the very last opportunity did CYC make the decision to reduce the threshold to 35ha. This conveniently occurred after Airedon highlighted, in previous representations, the failure of the Council to

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				apply its own site selection methodology in the assessment of ST14, which fell below the 100ha threshold but above the later 35ha threshold.
199	Private Individual	Section 05 Housing	H1 Housing Allocations	Failure in Council's approach to this issue is amplified by the inconsistency between the May 2018 SHLAA and the submitted February 2018 Publication Draft Local Plan Sustainability Appraisal. On the one hand the Sustainability Appraisal, a key document in determining the soundness of the Local Plan, identifies the threshold to be 100ha and on the other hand the later SHLAA identifies the threshold to be 35ha, which is the figure that has since been put forward in further evidence base documents such as the Audit Trail, which is the subject of this consultation.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Para. 2.18 of the Audit Trail evidence base document seeks to provide justification for the very specific 35 hectare threshold applied and indeed amended from the previous 100 hectare threshold. The paragraph states that a number of factors contributed to the change, including the evolution of sites submitted at each consultation stage, technical evidence by the Council and submitted by developers, as well as iterative and collaborative working between Officers and site developers, and ongoing engagement in meetings and workshops. The threshold determined by the Council is significant and changing it so dramatically has the ability to change the shape of the Local Plan entirely when considering the importance of strategic housing sites. At no point has the Council provided any concrete evidence to suggest that the radical, quick decision on the threshold is appropriate and justified. Given the lack of evidence, they are sceptical that any real thought has been attributed to it other than a desire to ensure that certain sites are included as allocations despite them failing their own site selection assessments.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The para. 2.18 suggests that Officers were informed by best practice examples and national publications released such as 'Locally-Led Garden Villages, Towns and Cities' from 2016, which indicated that the size of stand-alone 'self-sustaining' garden villages could be from around 1,500 to 10,000 homes. A site of approximately 35ha would be capable of bringing forward just 1,225 dwellings based on a density of 35dph without taking account of the provision of infrastructure and on-site facilities and services. It is therefore impossible to suggest that a site of 35ha would be capable of bringing forward the level of facilities and services required to

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				create a self sustaining settlement with a minimum of 1,500 homes as suggested by the Council's reference to the national publication mentioned above. Furthermore, as an example, ST14 at 55ha in size is only proposed to bring forward 1,348 homes, which is below the minimum threshold of 1,500 dwellings.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondents consider the Council has failed to apply its own site selection methodology in a fair, transparent and objective way, resulting in ST14 (land west of Wigginton Road) being put forward for strategic allocation when it should have failed at the initial stage of the process. This failure of the Council to undertake a proper, objective assessment of the sustainability of sites coming forward for potential allocation fails to meet the requirements of national planning policy and renders the plan unsound.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Green Belt Appraisal and Heritage Topic Paper both highlight that compactness is a key contributor to York's historic character and setting, with a key feature of the main urban area's setting being that it is contained entirely within a band of open land set within the York Outer Ring Road, which offers a viewing platform of the city within its rural setting. This is illustrated by the density analysis above. The shape and form of the surrounding villages are also identified as being compact and part of a distinct settlement pattern'. This aspect of Green Belt assessment was not carried through in a clear enough form in assessment documents as it would have prevented the extension of ST14 over this essential open space around the main urban area which apparently both previous assessments identified as critical to the York Green Belt. However, the various Green Belt assessments clearly identify areas between the ring road and other development where land 'prevent coalescence' or create a countryside setting for the city.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Having allocated a sustainable urban extension, that would provide a significant level of population that would support services and connected to existing services and facilities inside ring road. However, having failed to realise that it was precluded by the apparently identified need to retain open land around the main urban area, it might be thought that this should have triggered a reconsideration. Instead of this, ST14 site was simply trimmed down so that it was further from the ring road to an arbitrary line and did not encroach upon the new area that 'prevented coalescence' to the east of Skelton. However, this means that the resultant settlement did not meet the original spatial distribution principles set out in the early stages of the plan and did not meet the sustainability requirements set at that stage. The site was

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				significantly smaller than the 'sustainable' size identified (100ha at the time) and was no longer within the required distance of services and facilities.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	At this stage one might have assumed that an assessment that looked at ST14 as though it was a settlement should be considered in relation to development in the Green Belt. Development on the southern side of Skelton is a modest 2 storey in height. Despite this, early Green Belt assessments show that there is need for a gap between southern side of Skelton and the ring road of at least 1km. Although new development at ST14, if it is allowed to go ahead, is unlikely to be as low-level and will probably be 2.5 / 3 storeys, as is common for new development, the set back from the ring road is less than 600m. It is logical that, if development to the south of Skelton would result in coalescence, development that is closer than that to the main urban area would cause coalescence: there are no other circumstances that suggest that there should be a wider gap to the south of Skelton than ST14 in landscape terms. If, however, development can be accommodated within 600m of the ring road, it is questionable whether all of the area to the south of Skelton (or within any other of the 'areas preventing coalescence or creating the countryside setting of the urban area) have been properly assessed in the original Green Belt assessment.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It would be more logical to extend Skelton by some 400m to the south and extend it to the east of its current position: this would result in extension of an existing urban area that would be much more sustainable, support existing services and facilities, and also accord with the original Spatial Growth option that was adopted at the start of the process. Similarly, there may be many other options for sustainable extensions that have not been properly considered due to the initial Green Belt assessment of existing development
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The original Green Belt assessment might be correct in identifying that it is necessary to keep 1000m between the ring road and any new development. In this case, ST14 would need to lose about half its length from north to south.

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199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Indicates the initial Green Belt assessment was not correct in its assessments or that the changes to ST14 after the Proposed Options stage do not meet the requirements that are set out in that assessment. It also identifies that the York Local Plan process did not follow the processes set out in the Spatial Options and / or Green Belt Assessment if the Green Belt assessment identified a green ring around York as identified in the January 2021 document.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Highlights important aspect of the Green Belt Assessment. The Green Belt assessment was carried out to determine where the 'important' parts of green belt were to existing development: it did not ascertain whether parts of the Green Belt would be badly impacted if developed in other parts of the Green Belt. Led to the fundamental mistake of allocating an extension to York on the Wiggington Road site which contradicted the need to retain open land around the ring road. Clearly the initial report did not highlight this need sufficiently clearly for it to be taken into account at initial allocation stages. However, having made this mistake, no subsequent assessments have properly assessed whether the positive attributes of the Green Belt around York will be adversely affected by the proposed allocations.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST14, the assessment indicates: 'The Minster is visible from Manor Lane nearby however and views towards the core may be afforded from the higher patches of ground on site. Views of the Minster may be obstructed by existing and new development'. The assessment fails to note that there is a public bridleway that runs along the field boundary a field away from the northern edge of ST14. This bridleway offers access from Manor Lane, where views are restricted due to hedges etc., to Wiggington to the east, cutting off a longer road loop. The route offers attractive access through the countryside, with views of the Minster over the site of ST14. This will be completely changed by the proposed development with all views of the Minster lost.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	From referring to defined SP1, SP11 and SP13 respondent consider that the aim of the Plan is to define Green Belt boundaries that follow 'physical features that are readily recognisable'. This would suggest that boundaries such as hedge lines, rear boundaries to properties, railway lines, rivers and roads would all be features that might be considered as appropriate, if they formed a sufficiently significant feature that they are 'likely to be permanent'. An example, included later in the rep shows how York have sought to implement this in relation to a new settlement, ST14, perhaps the easiest boundary to assess as it necessarily does not involve residential curtilages of varying sizes or other existing development that needs to be considered in relation to whether it should lie within or outside the Green Belt and adjoining settlement.

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199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	In relation to ST14, the boundaries are marked out on the plan following roughly the northern, eastern, southern and western boundaries. Boundary 1 is said to 'follow historic field boundaries shown on 1852 OS Map. This is rather a surprising statement as there is an existing hedge line on this boundary so the proposed boundary does follow an existing hedge line which is not an unreasonable boundary. Whilst the fact that the hedge line was there in 1852 shows that the hedge line has been there a long time, it does not result in more 'permanence' as in reality the hedge line to the north would be equally as good or the one to the north of that or the one beyond that. Realistically, this hedge line does not provide a boundary that is likely to restrict development which can simply be added on to the north of the proposed settlement when it is proven that the settlement at its current size, cannot provide a sustainable new settlement.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST14 Boundary 2, along the eastern side of the proposed settlement, the assessment suggests 'This boundary follows the alignment of the Nova Scotia Plantation, identified on historical maps'. Whilst this is true for most of the boundary, the top section does not follow the edge of the plantation, it follows a hedge leading into it (although this is a good boundary with mature trees). However, to the south, the allocation continues further to the south than the plantation, but continues the alignment of the edge, cutting across a field. This follows a line that is not the edge of the plantation, is not the edge of an existing field, and does not even appear on any historical maps and does not, therefore, follow a physical feature that is readily recognisable and is therefore not a suitable green belt boundary based upon York's own assessment.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST14 Boundary 3, follows historic field boundaries shown on 19th and 20th Century maps'. It is acknowledged that this line is on historic maps. However, the field boundary is mainly marked by a grass strip in between the two fields, with a couple of groups of bushes from the previous hedge which would have once lined this boundary. Even York identify that this boundary is 'generally undefined on the ground'. Again, this is not a 'physical feature that is readily recognisable and likely to be permanent' not withstanding the fact that it has been a line on a map for a long period of time.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST14 Boundary 4, runs along the western boundary of the site and is said to 'follow historic field boundaries shown on 19th and 20th Century maps'. On the ground boundary follows a hedge line for much of the distance from the south to the north, with a few mature trees here and there adding a degree of increased permanence to the 'feature'. The boundary also follows a hedge that runs most of the way along the northern facing part of this boundary. However, the top western section of the boundary is in two parts the top section runs along a hedge line and then the bottom section crosses a field to meet the intersection between the other fields to the south, resulting in a slight bend to this part of the boundary on the allocation. This part of the

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				boundary follows no feature on the ground at the present time. Both the 1854 and 1950's maps of this area show that this field is divided into two sections, but the boundary does not run to the intersection of the fields to the south as might be expected, it instead runs to a point to the east. This means that the allocation boundary in this location is, similarly to the section to the south, running across a field where there are no physical features and there has never been a boundary. Again, this does not accord with York's own methodology.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Of the 4 boundaries to this proposed site, only one is identified in the boundary assessment as offering permanence (the eastern boundary) and this boundary itself has a section that runs across a field, following no physical feature nor any line on an historic map. None of the other boundaries are identified as offering permanence in York's own assessment, and part of one cuts across a field and does not follow an historic field boundary. This does not accord with York's own methodology of boundary assessment and does not give any confidence that any of the Green Belt boundaries have been properly assessed or will offer the degree of permanence required by the NPPG. York's own assessment accords with this, recognising that 'In defining a clear and defensible boundary for the new freestanding settlement, it is recommended that the existing boundaries are strengthened as part of the masterplanning of the site (for example through the creation of landscape buffers) in order to create a holistic single boundary, which acts as a defined and recognisable urban edge which will be permanent in the long term'.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Green Belt update papers 2021, aim to show that the Green Belt was properly assessed before the plan was submitted. However, analysis demonstrates that either the documents did not say what the 2021 documents suggest, or that this was ignored in the early allocations in the plan. This led to a fundamental problem i.e. the urban area of York being extended beyond the ring road at ST14.
199	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers there to be a flaw in the process which allowed only the Green Belt importance of land in relation to existing development to be considered. They believe this meant that sites were allocated on Green Belt land that did fulfil important purposes of Green Belt (as the redrawing of ST14 indicates) because parts of the Green Belt where development was being considered were not assessed for importance before sites were allocated

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199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Redrawing of ST14 boundaries does not apply the same assessment as was carried out to, for instance, land to the south of Skelton otherwise the less than 600m to the ring road for the current boundary would have had to be increased to at least 1000m. It is unrealistic to expect new development, with no defined boundary to the south, to have less impact than low two storey development set over 1000m from the ring road.
199	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	These mistakes- the redrawing of ST14 boundaries, which they suggest does not follow the assessment outlined in the documents- are compounded by the failure to follow the clear principles set out in their own documentation on the setting of new Green Belt boundaries, with boundaries being set that have no physical features, and some that do not even follow historic field boundaries.
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. The proposed green belt boundary around St Leonards Hospice does not correctly interpret nor apply the requirements of NPPF 2012 para 85 - does don't define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Comments relate specifically to the definition of inner boundary 31 - identified in blue on page A3:903.
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	The previously proposed GB boundary in the 2014 DLP, followed the tree line boundary to the east of housing allocation H6 i.e. the land to the east of St Leonards Hospice did not form part of the GB. Therefore it was considered to be consistent with para 85 of the NPPF (2012)

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	The proposed housing allocation H6 was reduced in size following comments submitted by St Leonards Hospice who were concerned that the development of this site for housing would impact negatively on the bedrooms at the eastern end of the building. The GB boundary was amended as a consequence which the respondent disagrees with.
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent opposes the justification of the inner boundary 31, with reference to planning permission 17/02619/FULM.
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	The current stepped boundary is not defined by any physical features and is considered to be somewhat irregular.
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	In order to provide a defensible boundary, the view is that the land to the east of the Hospice should be excluded from the GB with inner boundary 32 being continued to the north along the historic field boundary. this urban edge is already defined by a row of semi mature trees.
215	Wilberforce Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	The GB boundary would be consistent with the designation of an 'area preventing coalescence' in 2003 appraisal and would fulfil the criteria of the NPPF in defining a clear boundary, using physical features that are readily recognisable and likely to be permanent.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
217	Private Individual	Section 05 Housing	Site Allocation H31	Respondent does not consider document legally compliant. Believes evidence to support the various sites in and around Dunnington has been used selectively to justify H31
217	Private Individual	Section 05 Housing	Site Allocation H31	Respondent believes evidence to support the various sites in and around Dunnington has been used selectively to justify H31. For example, H31 was described as being near public transport when manifestly it is not, whereas a site near public transport was described as not being near public transport. Site H9 was put forward a few years ago by COYC as a traveller site, thus infilling the area between the existing built up area ,yet H737 was rejected because it infilled between the built up area and the A166
217	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Reassess the sites in Dunnington.
220	Private Individual	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails all tests of soundness; consistency with national policy, effectiveness, justification and being positively prepared.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The adoption of the plan is not likely until 2023. By then, 6 years have passed leaving an operational plan period of just 10 years.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	5 years post plan period for development, leaves only 15 years after the adoption of the GB. this is well short of the permanence for GB boundaries required by national Planning Policy.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document CYC/58 is unsound as it does not address the fundamental issues, in relation to housing supply.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's overall assessment of its housing requirement remains fundamentally flawed and does not make adequate provision for housing land supply
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is over-reliant on a small number of isolated strategic housing allocations to meet housing need and especially the critical affordable housing need
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The proposed housing allocations cannot deliver the houses the city needs. Strategic allocations cannot deliver the intended numbers

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Delivery of affordable housing will fall significantly short of what is required to meet the acute the need in York. Completions on strategic sites will occur later in the plan period than anticipated by the council.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A substantial amount of additional housing land will need to be allocated if the council is to meet its identified housing requirement and confirm and permanent GB for York.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to being positively prepared, there is a lack of adequate provision for housing supply which is inconsistent with the local plan strategy to meet objectively assessed development requirements.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to justification, the councils overall assessment of its housing requirement remains flawed - proposed housing allocations cannot deliver the houses the city needs. Plan does not represent the most appropriate strategy when considered against reasonable alternatives.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to effectiveness, there are significant flaws in the plan, including those relating to the plan period, housing requirements and need for additional housing land which will prevent the plan being effective and deliverable.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement must be increased to more accurately reflect the house needs of the city
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A reset of the plan period so that the start of the plan period is more closely aligned with the likely adoption date of the plan.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Key Diagram CYC/46 is unsound because it does not exclude sufficient land from the GB to meet the development needs and provide permanent GB boundaries
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to consistency with national policy, the plan is not consistent with national policy for meeting identified requirements for sustainable development, and will not deliver a permanent GB.
220	Private Individual	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails all tests of soundness; consistency with national policy, effectiveness, justification and being positively prepared.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
220	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 826) The council's approach is flawed and the emerging local plan is unsound with respect to the land at Moor Lane, Copmanthorpe.
220	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The council's assertion that the land serves each of the three GB purposes relevant to York is disputed, and the assessment in CYC/59f does not provide any compelling evidence to support the conclusion that it is necessary for the land to be kept permanently open.
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document CYC/59, CYC/59F and CYC/46 are unsound
220	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 826) With respect to being positively prepared, the GB boundaries, and inclusion of the Moor Lane site, is inconsistent with the Local Plan strategy to meet objectively assessed development requirements.
220	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 826) With respect to justification, the proposed inclusion of the site within the GB is not justified when considered against the council's own evidence. The land does serve the three GB purposes relevant to York, and there exist alternative options for robust boundaries that would provide a more enduring GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
220	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	(Site 826) With respect to effectiveness, the proposed boundaries will inhibit the requirement to meet housing needs and will not provide a permanent GB
220	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 826) With respect to consistency with national policy, GB boundaries will not facilitate the delivery of sustainable development in accordance with the policies in the framework. Requirements para 85 of the 2012 NPPF have not been correctly interpreted.
220	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 826) Amend the GB boundaries adjacent to the land at Moor Lane to utilise the well-defined and permanent boundaries to the west and north of the site.
220	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 826) Do not include land which it is unnecessary to keep permanently open and provide GB boundaries which are consistent with the requirement to meet sustainable development needs.
228	The Bull Commercial Centre	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider document to be sound. It is not "effective" as it fails to provide sufficient land for smaller light industrial units. Respondent propose the land adjacent to The Bull Commercial Centre, a major developed site, be taken out of the green belt to address this need.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
228	The Bull Commercial Centre	Section 03 Spatial Strategy	Policies Map (Green Belt)	Local Plan fails to provide sufficient land for smaller light industrial units. Respondent propose the land adjacent to The Bull Commercial Centre, a major developed site, be taken out of the green belt to address this need. *Map included of 'Extent of proposed expansion of the Bull Commercial Centre Outlined in red'
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Notes the significant change in circumstances since the Plan was submitted (economic downturn associated with the pandemic, 2 new sets of sub-national population and household projections, environmental conditions – traffic and air quality) evidence to support the Plan is now out of date, in particular EX/CYC/29 York Economic Outlook Dec 2019. This provides the only justification for the Council's housing need figure of 790dpa and is now out of date due to economic downturn.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/43a Housing Needs Update cannot be considered to provide an adequate, up to date and relevant evidence base for the Local Plan (NPPF1 para 158). - Concludes that 'the housing need of the City has not changed materially since the last assessment in January 2019', based on EX/CYC/29 employment forecasting; since this itself cannot be considered up to date or reliable, the central assumption of the Housing Needs Update is undermined. - Questions GL Hearn's decision to use variant population projections (contrary to Government guidance on using 2018 SNHP as the demographic starting point) and differing household formation rates without evidence of local issues or justification. - Fails to take into account trends in population change due to the pandemic and Brexit - Pre 2017 unmet housing need should not be taken into account; note that it is the assessed economic-led need rather than demographic need that the Council has previously argued has not been met.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	3-year delay caused by the need for the council to produce further information and proposal to meet fundamental concerns raised by the Inspectors about submitted local Plan evidence base. 18-months passed between submission (May 2018) and the first hearing (December 2019). Been further delay of 18-months whilst council sought to produce new information on housing need and green belt matters. Over this period, Council has continually failed to meet its own deadlines for submission of information and documents. Now there is still no clear timeline when the local plan will be adopted. The extent of the new material and the lapse of time, the Phase 1 hearing

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				will have to be repeated. Even if the Inspectors are happy to proceed beyond Phase 1, will have to be lengthy hearings on detailed Green Belt boundaries and other matters covered by the local plan. FPC's almost certain further rounds of consultation need to take place in the future. We consider that the Inspectors are unlikely to report before the end of 2022 and more likely the middle of 2023. By this time, the results of the 2021 Census will have become available causing a need again to review housing and economic needs.
231	Fulford Parish Council	Whole Plan	-	Noting the significant change in circumstances since the Plan was submitted (economic downturn associated with the pandemic, 2 new sets of sub-national population and household projections, environmental conditions – traffic and air quality) evidence to support the Plan is now out of date, in particular: Employment Land Review (SD063; Retail Study (SD065) Notes emerging Selby Local Plan, with options for a new settlement just outside York's boundary, with the potential to meet part of York's housing need. Current Local Plan should be withdrawn and a new plan prepared based on up to date information and current national planning policy and guidance.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Concern that updated 2021 Green Belt work constitutes a fresh assessment of the green belt boundaries which the inspectors indicate would be considered 'such fundamental evidence as this' is plan preparation work' and would be risk the new evidence would lead to 'different outcomes' Inspectors therefore said they would not support following such a path as part of the new examination.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Suggests EX/CYC/59 is confused about whether it has adopted a new methodology or not. Para. 2.132 describes it as a 'revised' methodology whilst para. 2.6 says that the council has just 'simplified and clarified its approach'. FPC considers CYC has just adopted a new methodology which has little relationship with the previous one. It has therefore acted contrary to the instructions of the Inspectors as set out in their letter of 12 June 2020. This becomes clear when the two methodologies are compared.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Difference in EX/CYC/ 18 and EX/CYC/59 methodologies: EX/CYC/18 defines areas of importance to Green Belt Purpose 1 (to check unrestricted sprawl of built-up areas) by identifying areas of land which did not have access to 2 or more services within 800 metres (Figure 1). EX/CYC/59 omits this plan and instead produces a plan 'Built Structure Density' (Figure 4), existing built-up areas. There is no attempt to identify areas of strategic importance to Purpose 1. This is a fundamental difference between the two methodologies.

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231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Difference in EX/CYC/ 18 and EX/CYC/59 methodologies: EX/CYC/18 aims to define areas of importance to Green Belt Purpose 2 (to prevent neighbouring towns merging into one another) by identifying areas of the city essential for preventing coalescence (Figure 5). Six areas shown. EX/CYC/ 59 does not identify any areas as important to Purpose 2. Although this follows the Inspectors conclusion, it represents a fundamental difference between the two methodologies.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Difference in EX/CYC/ 18 and EX/CYC/59 methodologies: EX/CYC/18 seeks to define areas of importance to Green Belt Purpose 3 (to assist in safeguarding the countryside from encroachment) by identifying areas of green infrastructure, nature conservation, green corridors and open space (Figure 6). EX/CYC59 omits this plan and simply includes text that recognises the obvious fact that the open land around York provides a countryside setting to the city. No attempt is made to identify areas of strategic importance to Purpose 3 which represents a fundamental difference between the two methodologies.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Difference in EX/CYC/ 18 and EX/CYC/59 methodologies: EX/CYC/18 seeks to define areas of importance to Green Belt Purpose 4 (to preserve the setting and special character of historic towns) on a plan (Figure 3). EX/CYC/59 retains this plan (Figure 3) but adds reference to the Heritage Topic Paper Update September 2014 [SD103] which it says provides much greater detail about the 'principal characteristics' of York's historic environment, including the city's compactness, landmark monuments and landscape and setting. This represents a very different approach as this document was not previously relied on.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Difference in EX/CYC/ 18 and EX/CYC/59 methodologies: EX/CYC/18 includes a plan (Figure 7) showing the 'strategic areas (of open land) which need to be kept permanently open' which text box on page 21 says 'sets the context for defining detailed Green Belt boundaries'. EX/CYC/59 omits this plan or any update of it. Therefore the new methodology provides no strategic context for defining detailed Green Belt boundaries. In effect, the new methodology seeks to look at each individual parcel of land around the city without any overview of whether it fulfils strategic functions or not (other than the areas shown on Figure 3). This approach represents a fundamental difference between the two methodologies.

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231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Difference in EX/CYC/ 18 and EX/CYC/59 methodologies: EX/CYC/18 (section 5c) sets out the local assessment criteria which were used to define the detailed Green Belt boundaries within the context of Figure 7. These criteria are protecting local historic assets, protecting land which is open and serves a countryside function on the urban fringe, and permanence. EX/CYC/59 replaces these with more general criteria derived from SD103 such as compactness, landmark monuments, landscape and setting, urban sprawl and setting and then sets a series of 'key' and of land and boundary. The approach is fundamentally different from the more strategic one taken by EX/CYC/18.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The new methodology set out in EX/CYC/59 cannot be considered to be a simplified or clarified version of that contained in EX/CYC/18. Instead, it represents a very different approach to defining Green Belt boundaries.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	This is change in methodology and approach between EX/CYC/18 and EX/CYC/59 is borne out by the very substantial modifications which CYC are now proposing to Green Belt boundaries. These include: The exclusion of Little Hob Moor from the submitted Green Belt (PM36) /The inclusion of the whole village of Knapton in the Green Belt. It had been previously excluded (PM41). /The exclusion of a large area north of Moor Lane around Hogg's Pond from the Green Belt (PM72). /The exclusion of Acomb Water Works from the submitted Green Belt (PM73). / The exclusion of Homestead Park from the submitted Green Belt (PM76). /The exclusion of the former Clifton Hospital site from the submitted Green Belt (PM78). / The exclusion of the whole village of Heslington from the submitted Green Belt (PM87), it had been previously washed over. / The exclusion of the Retreat hospital from the submitted Green Belt (PM89). /The exclusion of part of Imphal Barracks from the submitted Green Belt (PM90). / The major redefinition of Green Belt boundaries in the vicinity of Fordlands Road, Fulford (PM91). / The exclusion of Rowntree Park from the submitted Green Belt (PM92). / The exclusion of the developed part of York Racecourse from the submitted Green Belt (PM93). / The exclusion of Scarcroft Allotments from the submitted Green Belt (PM94). / The exclusion of Stockton Hall Hospital from the submitted Green Belt (PM100). / The significant redrawing of green Belt boundaries in the vicinity of Strensall Barracks (PM101). Part of this redrawing consists of the exclusion from the Green Belt of a large area to the east of Strensall Road which a previous modification had proposed to be included in the Green Belt.

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231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The number and extent of the proposed changes (whatever their merits or otherwise) to the Green Belt boundaries demonstrate that a different methodology has been applied. The use of a different methodology has given rise to the situation which the Inspectors had previously warned they would not agree to: namely that a 'fresh' assessment of the Green Belt boundaries would lead to 'different outcomes'.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The new methodology set out in EX/CYC/59 is intended as a response by CYC to the methodological flaws identified by the Inspectors in their letter of 12 June 2020. However, FPC still considers that it is still far too complex, not adequately robust, and takes into account matters which are not appropriate to the setting of Green Belt boundaries.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The flaws of EX/CYC/59 new methodology include: Method not providing for any strategic overview of the tracts of open land which need to be kept permanently open to serve essential Green Belt purposes. Without such strategic overview it is impossible to come to a proper assessment of whether or not individual parcels of land perform essential Green Belt purposes. CYC previously recognised need for strategic overview and tried to provide it (however flawed) as part of old methodology in EX/CYC/18. However, the new methodology does not include any strategic overview and seeks to assess each area of land around York individually without asking the fundamental question of whether or not it forms part of a wider tract of open land which fulfils essential Green Belt functions. Many of the detailed assessment questions on matters such as compactness, landscape and setting, and sprawl cannot be properly addressed by looking at relatively small parcels of land without a strategic context as EX/CYC/59 seeks to do.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The flaws of EX/CYC/59 new methodology include: Need for a strategic overview is necessary for a Green Belt like York where the primary purpose is to preserve the setting and special character of the historic town. For the Green Belt to fulfil this function, there needs to be a full study of what makes up the setting and special character which needs to be preserved. EX/CYC/18 sought to do this by reference to Figure 3 which purported to show the areas important to York's special character and setting. However, Para. 4.17 of that document also said that the figure only showed 'the most important' which the Inspectors identified as an area of potential weakness in the

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				<p>evidence. To overcome the point, EX/CYC/59 says that further work on this matter is set out in Heritage Paper Update September 2014 (SD103). However, this was not produced for the purpose of defining Green Belt boundaries and provides little assistance. Most of the document is concerned with the 'principal characteristic' of existing urban area and especially the city centre rather than the surrounding open land. Are parts which deal with landscape and setting but are very generalised and provide little assistance for whether or not individual parcels of land should be included within the Green Belt. It is worth emphasising that SD103 provides no diagrammatic indication which tracts of open land round the City may be important to maintain compactness or important views of landmark monuments or the setting of villages. Where textual detail is given, the site assessment annexes to EX/CYC/59 has often ignored it. We give two examples here but there are many. Under the heading 'Landscape and Setting', SD103 says a 'key feature' of 'the open countryside surrounding York' are ' Airfields with large expanse of openness/cultural heritage/habitat value'. Under the sub-heading of significance, SD103 specifically refers to Elvington Airfield with 'its uncommon grassland habitat and birds because of extensive open nature'. The only possible conclusion from this is that Elvington Airfield in its current open condition is a key part of the landscape and setting of the historic city. Despite this, EX/CYC/59g (Annex 5) places little significance on the fact that Proposal ST15 would lead to loss of over half of the Airfield for the new settlement. No particular harm is identified. Similarly, SD103 identifies views of the Minster from the A64 between Hopgrove Roundabout and Hill Road as key features of York's landscape and setting. Despite the EX/CYC/59 Annex 5 places little significance on the fact that Proposal ST7: East of Metcalfe Lane would bring development much closer to the A64 in this location and intrude significantly (even with landscape mitigation) into the present important view across the site to the Minster.</p>
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	<p>The flaws of EX/CYC/59 new methodology include: Things within the methodology which should be irrelevant to consideration of Green Belt boundaries. Questions 2.1, 2.2, 2.3 and 3.2. Fully accept that long distance views of such features as the Minister, Terry's and the Racecourse are important to the setting and special character of York, but it is no function of the Green Belt to protect the setting of individual listed buildings, conservation areas and registered gardens. These are protected under other policies. Despite this, Annex 3 makes multiple reference to such protection when justifying the proposed boundaries.</p>

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231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The flaws of EX/CYC/59 new methodology include: Using terms in Annex 5 such as 'minor harm' and 'significant harm' without defining what these mean. It is impossible for anyone to understand the extent of harm which is being envisaged so that a proper judgement can be made about the appropriateness of the proposed boundaries. Judgements are made about potential harm or the absence of it without clear explanation. Often 'potential mitigation' is used as a reason to reduce the assessed harm without giving any explanation how this mitigation would work. Some of the important judgements made about strategic sites are perverse and demonstrate unsoundness.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The flaws of EX/CYC/59 new methodology include: The documentation forming the EX/CYC/59 and its annexes is overly lengthy, presented confusingly, often repetitive and sometimes contradictory, and contains material which is irrelevant to defining Green Belt boundaries. The quantity of verbiage conceals whether matters of significance have been treated properly. As a whole, the document does not provide an appropriate basis to define Green Belt boundaries around York for the first time.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/18 recognised importance of assessing overall impact of the Submitted Local Plan upon the purposes of the Green Belt and made a judgement upon it (7.117). Although respondent disagreed with that judgement and showed in argument at the first phase hearings that it was contradicted by the Council's own more detailed evidence, the document saw the importance that such a judgement is made. In contrast, EX/CYC/59 fails to come to any conclusion about the impact of the Submission Local Plan proposals upon Green Belt purposes, and particularly the primary purpose to preserve the setting and special character of the city. Lack of any conclusion on this matter has implications for the local plan and its compliance with national policy and legal requirements. The starting-point is NPPF1 para. 14. This states that local plans should meet objectively assessed needs. However, importantly, it makes two exceptions which are where: '-any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; - specific policies in this Framework indicate development should be restricted' The issue is whether these exceptions apply in York.

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231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	NPPF1 (79) recognises the importance which the Government places upon Green Belts. Para. 80 sets out their 5 purposes. If development needs can only be met by Green Belt boundaries which cause significant harm to these purposes, NPPF para. 14 indicates that such boundaries do not accord with national policy. At very least, the first potential exception under para. 14 requires that any harm is properly identified and balanced against the benefits of fully meeting needs. EX/CYC/59 takes a totally different approach to NPPF1 para. 14. It assumes that development for housing, employment and education needs have to be met in full and undertakes no balancing exercise to assess whether the harm caused by doing so is outweighed by the benefits. It cannot, of course, carry out a balancing exercise because it has not evaluated overall harm to Green Belt purposes by the Local Plan proposals. For the record, it has been a consistent Local Plan theme through the years that development needs should be met in full without any consideration of the impact upon the purposes of the Green Belt or the wider environment.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Government has consistently made clear that development needs should not be met in full if it would have an unduly adverse impact upon the Green Belt. The latest statement (April 2021) is in regard to the standard housing methodology but the principle applies more widely: 'Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in (Paragraph 14 of NPPF1) or our strong protection for the Green Belt.' Such guidance is of particular importance for York which is an historic city of recognised international importance and where the primary purpose of its Green Belt is to preserve its setting and special character.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The lack of any overall assessment of harm to Green Belt purposes in EX/CYC/59 means that the judgements made within the Sustainability Assessment about housing and Green Belt policies lack an adequate evidence base which takes the plan out of legal compliance.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
231	Fulford Parish Council	Whole Plan	-	EX/CYC/59 relies on needs assessment (Housing, Employment and Educational needs) which are now out-of-date because of the pandemic and the associated economic downturn.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The former Annex 5 which sought to assess the potential impacts of strategic sites upon Green Belt purposes has not been replicated in the 2021 iteration. The replacement Annex 5 EX/CYC/59g is a much shorter document on the proposed new settlement sites and the respondent questions the level of detail used in assessing impact of sites on the Green Belt purposes. Particular concern expressed in regards to ST7 and ST15.
231	Fulford Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST27 is the University of York Expansion (pages A3.679 to A.686 of EX/CYC/59e) Section 7, Boundary 7-8. Section starts with saying that the Green Belt Boundary 'runs along the drainage ditch from the edge of the outdoor cycle track (of York Sports Village), along the southern extent of the lake to the weir which crosses the lake'. We assume that this is the boundary which the section assesses, despite the fact that it is a different boundary to that shown by the Submitted Plan. Assume from the context that where there are references to 'the land which needs to ne kept permanently open', there are references to land south of this boundary which includes the allocated strategic site ST27. No other interpretation of the text would be sensible.
231	Fulford Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Annex 3 (pages A3.679 to A.686 of EX/CYC/59e , Section 7, Boundary 7-8) clear statements about harm which built development south of the University lakes would cause, Applying CYC's own criteria, it says: '1.1 The land should be kept permanently open as part of a wider view of a dense compact city in an open or rural landscape'/ '1.2+1.3 The land should be kept permanently open as part of maintaining the scale and identity of York and its districts as well as maintaining a connection to open and historic setting'/ '3.1 The land should be kept open to aid the understanding of the historical relationship of the city to its hinterland'/ '4.1 Land is connected to the urban area and therefore relevant for sprawl'/ '4.2 Land is contained by strong boundaries on more than one side and is therefore contained, however, development would still represent sprawl'/ '5.1+5.2 The land contributes to the character of the countryside through openness and views'. Although EX/CYC/59e makes no overall assessment of potential harm that development south of the University lakes would cause, the above findings demonstrate significant conflict

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				with essential Green Belt purposes. Conflict is best summarised by the following statement which comes under heading of urban sprawl: 'The proposed boundary defines where University Campus East meets its rural setting. Should development be allowed to occur freely within the land to the south and south-east of the proposed boundary (i.e. within the site of ST27), it would be eventually contained by the York Outer ring Road. However, given that this land is important to keep permanently open in line with purpose 4, allowing development up to the road would represent unacceptable sprawl as it would result in the loss of compactness and the rural setting, which would be detrimental to the York Green Belt'
231	Fulford Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	(pages A3.679 to A.686 of EX/CYC/59e , Section 7, Boundary 7-8) Section considers the strategic site allocation. Have been requests from University for expansion and there is potential to extend 'the new nursery and excellent transport links which exist in this location'. On this basis, it says that there is potential here for a sustainable employment growth location 'which would focus development towards the urban area within the Green belt (in line with NPPF para.85)' It also says site is a sustainable option when judged against the site selection criteria and employment land assessment, adding that the Heritage Impact Assessment (September 2017) has identified that there is some potential scope for development if the compactness of the city and its rural setting could be preserved. Respondent consider that this reasoning makes little sense. One of the principal elements of the Local Plan Strategy is to conserve and enhance York's historic and natural environment (Policy SS1) which must include its setting and special character as a historic town. If, as the Annex suggests, ST27 would cause 'unacceptable harm', the allocation of the site cannot be considered to be in accordance with the strategy. The references to the site selection criteria and employment land assessment are irrelevant as these do not include consideration of Green Belt purposes. Similarly, the reference to the Heritage Impact Assessment (HIA) is of little assistance because it was prepared applying the Council's misunderstanding of Green Belt purposes as revealed during the first phase hearings. The HIA does recognise that significant harm would be caused by the proposal to the rural setting of the city and there is no suggestion that it would be successfully mitigated. The HIA only says the 'screening and landscaping may afford some protection' but it does not consider whether the type of bounding and heavy landscaping required to partially screen the site from the A64 would appear as alien and urbanising features in the otherwise open rural landscape.

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231	Fulford Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Annex does not consider separately the impacts of the Strategic Site ST27 upon each of the relevant Green Belt purposes. The only such consideration given is about a Green Belt boundary running alongside the University lakes to the north (pages A3.679 to A.686 of EX/CYC/59e , Section 7, Boundary 7-8). The Annex fails properly to consider the impacts of Strategic Site ST27 upon the purposes of the Green Belt. What analysis there is suggests that the allocation would have an unacceptable impact.
231	Fulford Parish Council	Section 05 Housing	Site Allocation ST15	ST15 is the new settlement site 'Land West of Elvington lane' An assessment of the potential impacts of the new settlement is set out in Annex 5 (EX/CYC/59). This assessment has major flaws.
231	Fulford Parish Council	Section 05 Housing	Site Allocation ST15	ST15 Assessment of impact has major flaws: It provides no overall assessment of degree of harm which the new settlement would cause to Green Belt purposes, although accepts there would be some unspecified level of harm. Without an overall assessment, the harm cannot be balanced against any benefits of the proposal. This is important as the proposal is by far the largest housing allocation of the Local Plan and is central to its strategy. Without a proper assessment of its potential harm, the Local Plan strategy cannot be said to be properly justified nor can the sustainability assessment be said to be based upon adequate information. CYC local plan documentation repeatedly says that the strategy of freestanding settlements will limit harm to the purposes of the York Green Belt compared to the alternatives but without full assessment of harm (both cumulatively and individually) this is just an assertion and not evidence. Equally the potential harm from the new settlement needs to be put into the balancing exercise required by NPPF1 when determining whether development needs should be met in full by the Local Plan.
231	Fulford Parish Council	Section 05 Housing	Site Allocation ST15	ST15 Assessment of impact has major flaws: The lack of a conclusion on overall harm from the proposal means that it cannot be properly evaluated against alternative new settlement sites or strategies not involving new settlements.

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231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	ST15 Assessment of impact has major flaws: EX/CYC/59g has not assessed impact on Green Belt purposes of the substantial off-site infrastructure required to serve ST15, including a new 1.8km access road crossing open countryside and a large new grade-separated junction onto the A64. This new road infrastructure is a key part of the proposal would have a considerable impact on the rural landscape to the south of the city, including the rural settings of Heslington and Fulford. However, it is completely ignored by the assessment. Failure to consider highly harmful off-site infrastructure is a fatal failing of the evidence, including the sustainability assessment.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	ST15 Assessment of impact has major flaws: EX/CYC/59g assesses the harm of the proposal as 'minor to significant' in relation to criteria of compactness, landmark monuments, landscape and setting and encroachment. Document does not define what 'minor' and 'significant' means or where the degree of harm lies in what must be a very broad range of potential harm. It does not provide any detail how these judgements have been reached or why it considers that the 'scale and form of development' would allow for significant mitigation. Many of the judgements appear unreasonable to the point of perversity. For example, it is extremely difficult to understand how the development of a 259ha new settlement for over 3300 dwellings located within one of the most tranquil and attractive areas of countryside around York (criss-crossed by public rights-of-way) can be said to result in only 'minor' harm to Green Belt purpose 3. Equally EX/CYC/59g completely fails to even acknowledge the importance that SD103 says that the open character of Elvington Airfield has as a key feature within the open countryside and green belt surrounding York.
231	Fulford Parish Council	Section 05 Housing	Site Allocation ST15	ST15 Assessment of impact has major flaws: EX/CYC/59g ignores the role which the site of ST15 plays as part of a much wider tract of open countryside to the south of York which includes forming part of the setting of Heslington, Fulford and Elvington villages.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	- Lack of appraisal of the potential impacts upon GB purposes of identified strategic sites. - Notes multiple concerns around the appraisal of the impacts on GB purposes of sites ST7, ST14, ST27 and ST15 in particular.

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231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The former Annex 5 sought to assess the potential impacts of strategic sites upon Green Belt purposes has not been replicated in the 2021 iteration. Where sites adjacent to the urban edge are assessed in Annex 3 EX/CYC/59e this is done in much less detail than previously respondent questions the level of detail used in assessing impact of sites on the Green Belt purposes. Particular concern expressed in regards to ST27.
231	Fulford Parish Council	Whole Plan	-	For the reasons given, EX/CYC/59 and Annexes cannot be considered to provide an 'adequate up-to-date and relevant' evidence base for the Local Plan (NPPF1 para.158) As such the Council's reliance upon it means that the local Plan fails the soundness tests of being justified and consistent with national policy.
231	Fulford Parish Council	Section 05 Housing	H1 Housing Allocations	EX/CYC/56 SHLAA The Plan greatly over-provides housing land against the identified requirement; windfall allowance should be significantly increased to take into account of relaxation of permitted development rights (re office/retail to resi conversions) and working from home.
231	Fulford Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Since the CYC/Selby Joint Statement was produced in April 2020, Selby District Council has made significant progress with its local plan including the publication of an options document. One of the main options being suggested is one or more new settlements just outside York's boundary and the Green Belt. Although these new settlements are primarily intended to meet Selby's needs, they would also be well-located to meet part of York's needs if there could not be met without significant harm to the setting and special character of the historic city. This represents a significant change in circumstances since the original Phase 1 hearings.
231	Fulford Parish Council	Section 05 Housing	GB4 'Exception' Sites for Affordable Housing in the Green Belt	The proposed modifications are intended to allow rural exception sites for the caravans of gypsies and travellers. NPPF1 para. 89 which allows an exception to Green belt restrictions for 'limited affordable housing for local community needs', Affordable housing is defined by the Glossary as: 'Social rented, affordable rented and intermediate housing, provided by eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative

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				affordable provision'. It is difficult to see how a privately owned site offering caravan pitches could fulfil this definition which is clearly related to providing affordable dwellings within permanent buildings and managed by a registered provider. National planning policy treats gypsy and traveller sites as inappropriate development to be justified by very special circumstances and so should the local plan. FPC considered that PM67 and 68 fails the soundness tests of being justified and consistent with national policy.
231	Fulford Parish Council	Section 05 Housing	GB4 'Exception' Sites for Affordable Housing in the Green Belt	FPC considers that PM66 fails the soundness tests of being justified and consistent with national policy. The justification for the proposed policy modification is said to be 'to strengthen policy approach for those Gypsy and Travellers not meeting the Planning definition, encouraging on-site provision unless proven unviable' However, this is not the effect of the policy modification which retains provision off-site as an option of equal validity to on-site provision. Policy H5 appears to be intended to allow such alternative provision on sites within the Green Belt contrary to national policy.
231	Fulford Parish Council	Section 05 Housing	H5 Gypsies and Travellers	Ensure that on-site Gypsy and Traveller provision is prioritised as matter of policy, FPC suggests the proposed modification is reworded as follows: 'Applications for larger development sites of 5ha or more will be required to provide the required number of pitches within the site. Off -site provision or commuted sum payments to contribute to development of pitches elsewhere will only be allowed where on-site delivery is proven to be unviable.' Our proposed change would bring the policy more in line with that taken by Policy H10 for affordable housing.
238	Gillian Shaw	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In determining the Green Belt Boundary changes for development, there are no scales of size given or justification why land is being taken out of the Green Belt
238	Gillian Shaw	Section 05 Housing	Site Allocation H31	pA4:54 - No justification for the development on The Market Garden on Eastfield Lane, Site H31 is not of significance should not be put forward. No logic or justification why H31 can be developed up to "existing farm" but one field on Intake Lane cannot be developed because it would link the cluster of 3 properties

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238	Gillian Shaw	Section 05 Housing	Site Allocation H31	The views from Mill Hill, including a prominent view of York Minster, will be blocked if H31 is made for development
238	Gillian Shaw	Section 03 Spatial Strategy	Policies Map (Green Belt)	pA4:57 Boundary 2 – information missing as there is no mention of the fact that the boundary crosses a public footpath
238	Gillian Shaw	Section 05 Housing	Site Allocation H31	pA4:65 disagree with “potential for the village of Dunnington to grow” – the village infrastructure is not capable of sustaining further growth and the only access to the site H31 is not wide enough for construction traffic
238	Gillian Shaw	Section 03 Spatial Strategy	Policies Map (Green Belt)	pA4:58 Boundary 2 – Confusion over wording what the justification over strengthening the boundary to resist further encroachment eastwards, cooperation with Dunnington Parish Council and residents may lead to an alternative solution rather than building 78 homes
238	Gillian Shaw	Section 03 Spatial Strategy	Policies Map (Green Belt)	H31 is the start of what remains of the remnant strip of field pattern and is therefore of historic value, it should not be taken out of the Green Belt

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238	Gillian Shaw	Section 03 Spatial Strategy	Policies Map (Green Belt)	pA4:54 "Boundary 2 - The Market Garden on Eastfield Lane is separated to the east of Dunnington by one field. It is more open compared to the main urban area of Dunnington and in agricultural use so more built-up nature than the surrounding countryside. There is some scope for extending the village to this north east corner, which would bring development up to include the existing farm" - "Existing farm" should be changed to "The Market Garden"
238	Gillian Shaw	Section 03 Spatial Strategy	Policies Map (Green Belt)	pA4:56 – "The Market Garden along Eastfield Road is an acceptable use in the Green Belt, and while less densely developed than the main urban area of Dunnington it is more built up than the surrounding countryside. It is compatible with rural and agricultural uses. Can only be accessed from Eastfield Road" – misleading statement as by its nature it is a Lane bounded by historic hedging which from the start of H31 is a single track road to the junction of the A166. It should read "Eastfield Lane" not road.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns over the level of past under-delivery/shortfall given discrepancies between CYC figures and MHCLG figures, The reasons for the differences are not properly explained
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent recognises that the level of delivery required to fully address affordable housing need in York is unlikely to be achieved - however considers some uplift is still necessary.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that even though the delivery required to fully address need in York is unlikely to be achievable, a further 10% uplift to the OAHN to consider affordable housing need would be appropriate and realistic given the significant need identified. The 10% offers a streamlined approach which removed judgement and debate

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253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the use of the 10 year migration trend
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the modelling of the alternative internal migration scenarios
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the application of accelerated headship rates to younger cohorts in calculating the demographic figure
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Respondent does not consider local plan to be sound as it is not justified, positively prepared, effective, or consistent with national policy. The HNU is limited in its scope because it does not review the latest evidence on market signals within the City. Nor does it revisit the affordable housing need for the city, the mix of housing required, or the needs for specific groups. The housing requirement presented fails to meet the full OAHN, which is significantly higher than the council has estimated.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers the HNUs evaluation of, is not as robust as the PPG ID 2a-017 requires, and has only been partially completed. The demographic baseline assessment should also have considered the High International variant produced by ONS, which is more in keeping with longer term trends, but it did not. While previously the 2016 SNPP and MYE had been approximately aligned for international migration data this is no longer the case in the latest (2019) data. This is not analysed in the 2020 HNU. The respondent hypothesises that the high international growth could be as a result of higher education users especially at the universities

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				and that this trend is likely to continue in the future and therefore these international migration figures should be used in determining the correct OAHN.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent questions using the ELR timeframes and data (2014-2031) and projecting this forward over a different time period (2019-2033/37).
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent questions the modelled job growth between 2017-19 as Nomis Job Density information for this period shows stronger growth than that factored in.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent challenges whether historic employment growth needs have already been met and that accommodation has already been provided to support that growth.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent considers that historical economic growth trends should be considered, as York has previously been successful in boosting economic growth particularly between 2000 and 2017.

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253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent disputes the scale of market signals uplift, principally because there is no sound basis to conclude that the uplift can be reasonably expected to improve affordability, and imbalances between the demand for and supply of housing will not be addressed by providing only for the level of growth produced by the continuation of demographic trends.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers uplift resulting from affordable housing need and from market signals analysis have been conflated. These are two separate steps in the practice guidance and should not be combined in this manner.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the growth in student numbers is not properly accounted for in calculating the OAHN as the growth in the 18-23 age cohort cannot be assumed to include growth in student numbers. The projections clearly indicate that they do not adequately reflect the Universities' student growth targets. The respondent questions why the methodology employed by GL Hearn for Guilford Borough Council, has not been applied here to account for a further uplift despite University of York and York St John being clear about their plans to expand and the councils knowledge of students in the private rented sector.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns that a substantial amount of C2 student accommodation is included within the completions data between 2012 and 2017 therefore reduces the amount of shortfall calculated. An example is given of 2 off campus privately managed student accommodation sites being included in 2015 where a mixture of self-contained and student flats with shared facilities were built – the figure reported does not account for this split.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns over the level of past under-delivery/shortfall given discrepancies between CYC figures and MHCLG figures – they do not feel the explanation given for this is sufficient.

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253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises Concerns over the level of past under-delivery given a higher OAHN (1,010dpa) should have been applied to calculate shortfall
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers that there should at least be a sensitivity testing for long term international migration trends in the HNU based on 'specific local circumstances' as per PPG ID 2a-017.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent suggests an undersupply of employment provision should be considered for the years 2017-2019 in the economic growth considerations for the OAHN (within the HNU methodology), in the same way as it has been for housing.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent Suggests that if a demographic-based housing need figure of 803dpa is used no further upward adjustment is needed in order to align employment growth. Demographic based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2 and past trends.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent proposes market signals uplift is revised form 15% to 25 % or higher given the current sm2 uplift of 25%.

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253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent proposes the Market Signals uplift should be applied to a revised demographic starting point, not the SNPP, given that GL Hern admit the 2018-based projections are less robust for York. This would lead to a need for 836dpa
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the growth in student numbers should be factored in to the OAHN - with 1,466 dwellings over the 16-year plan period this would equate to an additional 93dpa
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests MHCLG figures be used to calculate under supply increasing necessary uplift to 153dpa
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests a higher OAHN of 1,010 should be applied and this would identify a shortfall of 101dpa over 16 years. 9 creating a housing requirement figure of 1,111.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent raises concerns over inconsistent data sources and methodologies being used across the same Housing market area (Selby 2019 SHMA and the York 2020 SHMA update), including York employing the NPPF 2012 OAHN approach while Selby uses the standard method. This has resulted in both areas identifying the lower resulting OAHN for each area.

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253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers that a joint SHMA between Selby and York should have been prepared given that they do share a joint housing market area and are part of the same travel to work area.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to an OAN of 790 and the resulting Housing Requirement - questions are raised against several aspects of the methodology in reaching this figure which they believe should be higher (See further detail in comments relating to Housing Needs Update EX/CYC/43a)
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that OAHN should be increased following changes to the methodology to 1,010dpa resulting in a target of between 1,042 and 1,111spa when adding in inherited shortfall.
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	The respondent states that the councils approach to lead-in times is not robust, particularly with regard to ST14 and ST15. The respondent also suggests it is unclear if any allowances for longer lead in times on larger sites have been made within the housing trajectory Evidence from Litchfield papers "Start to Finish" and "housing issues technical papers 2018 and 2019" are submitted to support this claim..
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent questions suggested delivery rates of proposed allocations as not being based on robust assumptions. Argued that build out rates cannot be simplistically multiplied based on the number of house builders or delivery outlets on a site. Delivery speed is shaped by local market conditions, economic conditions, proximity to competing sites, housing market area and type and quality units. While a site of 250 homes with one outlet might deliver 40dpa, a site up to 500 homes with two outlets might only deliver 65dpa. This is evidenced by work set out by Lichfield's "start to finish" report.

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253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	The respondent considers the proposed gross to net ratios and assumed densities set out for sites in the trajectory are ambitious, do not allow for open space requirements, and will not be achieved. In the absence of specific developer information assumptions should err on the side of caution and this is not the case in the shlaa. There is particular concern that in suburban areas 40dph will not provide adequately sized family housing.
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	The respondent feels the council needs to adopt a more cautious approach when seeking to include strategic allocations within the 5 year supply – it is considered that a number of these do not have a realistic prospect of delivering housing in the next 5 years
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent argues that CYC may only have a 3YHLS based on a more realistic OAHN of 1,010dpa, reasonable adjustments to windfalls and the Sedgfield approach to backlog.
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent supports the inclusion of a 10% non-implementation rate
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent accepts windfalls should be included in the overall housing delivery trajectory but only outwith the first 5-year period as its inclusion in earlier years is likely to artificially inflate the housing delivery figures in year 3 and does not account for potential delays to build out rates.

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253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent questions using a windfall allowance figure of 182dpa when this figure has only been achieved 4 times in 10 years
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns in the way in which the Council have calculated historic housing completions (shown within table 8 of the 2021 SHLAA Update) is flawed and is inflated through the inclusion of privately managed off-campus student accommodation that do not meet the varied housing needs of York's residents
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	The respondent considers that as a starting point the average lead-in times for development as set out within "the Litchfield "Start to Finish" paper should be used: 55-99 homes = 3.3 years, 100 to 499 homes=4 years, 500 to 999 homes=5 years, 1000 to 1499 homes=6.9 years, 1500 to 1999 homes = 7 years and 2000+ homes = 8.4 years.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes that in order to make appropriate provision to sustainably deliver housing in a timely manor to meet the city's full OAHN - further site allocations are required above and beyond those currently proposed in the Local Plan
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	The respondent considers gross to net ratios between 60 % and 85 % would provide a more realistic basis for the provision on open space and infrastructure requirements on sites

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253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	The respondent considers that in suburban areas the default density of 35dph should be used as is more achievable and more likely to provide family homes.
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent suggests further evidence on the prospect of delivering sites within the first 5 years should be provided
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent suggests that the detailed housing trajectory table – applying a non-implementation rate (Figure 2 of the 2021 SHLAA update) should also be included within the Local Plan as it sets out how the council housing supply has been derived.
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent suggests windfalls should only be included from year 6 of the plan (2025/26).
253	Bellway Homes	Section 05 Housing	H1 Housing Allocations	Respondent suggests windfall allowance should be reduced from 182dpa to 102dpa due to the changes in the definition to previously developed land to remove garden sites and the surge in conversions created by changes to permitted development rights reducing out over time as locations become less available/attractive.

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253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests the council should be employing the Sedgfield approach not the Liverpool method.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that given the significant level of historic under delivery, a 20% buffer should be applied to both forward requirement and under supply. The buffer does not become part of the requirement but provides a realistic prospect of achieving the planned supply through the provision of excess land to enable the requirement to be delivered.
253	Bellway Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	(Site 966) Concern with the adopted methodology. does not address the issues raised by the inspectors in their letter of June 2020. Approach taken to identifying boundaries is flawed, due to a lack of transparency and justification as to how the findings within the document have resulted in the GB boundaries identified.
253	Bellway Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 966) Conclusions of the paper contradict the conclusions previously reached by the council when it identified the site as safeguarded land. The land does not need to be kept permanently open in order to aid the perception or understanding of a compact city and the east of Strensall Road site is suitable for removal from the Green belt.
253	Bellway Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 966) The east of Strensall Road site does not therefore need to be kept permanently open as part of the wider landscape associated with the historic character and setting of York. Commentary used by the council on this criterion bears little relevance to the purposes of Green belt set out at paragraph 80 of the framework, or the considerations for defining boundaries at paragraph 85.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
253	Bellway Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 966) Council fails to identify individual land parcels towards Green belt purposes. the east of Strensall road site is able to contain the urban area and protect the open land beyond from urban sprawl and is therefore suitable for removal from the Green belt and inclusion within the settlement boundary of earswick.
253	Bellway Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 966) Criticise the assessment of encroachment. Necessary to consider the presence of a strong physical boundary and the extent of development which does not fall within an appropriate countryside use. The east of Strensall Road site is contained by development to the west and much of the south, with strong defendable boundaries to the east and north which can be appropriately landscaped as part of a well designed development.
253	Bellway Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 966) Regarding boundary permanence, the tightly drawn boundary, offers no opportunity for future sustainable growth of the village. Further, the continued use of measures such as relative sustainability, location of open space and flood risk amongst others goes against the Inspectors request to change such measures.
253	Bellway Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Site 966) The council has set out to prepare evidence which supports its policy of no green belt release, without undertaking a robust assessment of the contribution different sites make to the green belt.
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent does not consider the modifications to be sound, as they are not positively prepared, justified or consistent with national policy. The PPG sets out guidance on how to undertake a housing needs assessment, in relation to the standard method. Respondent does not consider the projections provide an appropriate basis for use in the standard method.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Concerning Policy SS1. The respondent does not consider the modifications to be sound, as they are not positively prepared, justified or consistent with national policy. The major concern with regard to the latest household projections is that they will continue the trend of younger people forming households much later in life than in previous years.
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent does not consider the modifications to be sound, as they are not positively prepared, justified or consistent with national policy. The PPG requires the continued use of the 2014-based household projections, as it states that this will provide stability for planning authorities and communities. The respondent recognizes that the principles set out in the PPG have been made in relation to the standard method, they provide a clear statement from Government that the 2016 and 2018 based projections should not be used for assessing housing needs. Significant caution should be given to the use of the 2016 and 2018- based household projections.
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent recommends that the policy is modified as follows: "Deliver a minimum annual provision of 1,026 new dwellings over the plan period to 2037/38. This will enable the building of strong, sustainable communities through addressing the housing and community needs of York's current and future population"
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Policy SS1. The respondent supports the council in ensuring there is a supply of housing land over the housing requirement to provide a buffer. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
255	Home Builders Federation	Section 05 Housing	H1 Housing Allocations	Policy SS1. The respondent considers that the use of historic windfall in an area where there has been no adopted plan may not provide the most appropriate basis for windfall development going forward.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent recommends the removal of historic windfall from the supply and instead used to provide flexibility.
255	Home Builders Federation	Section 05 Housing	H5 Gypsies and Travellers	Policy H5. The respondent does not consider this modification to be sound, as it is not justified or positively prepared. The respondent has concerns in relation to this policy and the proposed amendment, in relation to the need for larger development sites to meet the needs of Gypsies and Travellers households that do not meet the planning definition set out in Planning Policy for Traveller Sites. Further clarity is needed as to why provision is needed for those households no longer meeting the definition.
255	Home Builders Federation	Section 05 Housing	H5 Gypsies and Travellers	The respondent recommends that part b of this policy relating to the requirements for larger development sites in providing Gypsy and Traveller sites should be deleted.
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is necessary to consider other forms of monitoring in the area that could have provided a comparator in relation to document CYC_32.
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers it to be useful to note the number of properties that had been added to the council tax list for each year, this would likely have been an over estimation as this would include temporary properties but may have provided more support for the housing completions identified by the council.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent is concerned that the evidence provided by the council continues to identify that the affordable housing need will not be met.
255	Home Builders Federation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers that it may be appropriate for the council to consider a further uplift in the housing requirement to help to contribute to the delivery of affordable homes.
257	Henry Boot Developments Limited	Whole Plan	-	Composite Modifications Schedule includes appropriate and logical amendments to the Submission Draft Local Plan which do not impact on the soundness of the emerging Local Plan.
257	Henry Boot Developments Limited	Section 05 Housing	Site Allocation ST16	Respondent (HBD) maintains its support for the allocation for all 3 phases of the Terry's Extension site ST16 in the draft plan
257	Henry Boot Developments Limited	Section 05 Housing	Site Allocation ST16	ST16 - Land on which Phase 3 of ST16 is proposed is currently subject to a detailed design and in coming weeks a planning application for a new Acquired Brain injury hospital to be developed jointly by HBD and The Disabilities Trust (the Trust). The proposed facility will provide purpose built residential accommodation for the Trust which currently occupies York House, a wing of The Retreat on Heslington Road, York. The Trust's lease expires in May 2022 and, the Retreat is a Grade II* listed building, is no longer fit for purpose, given the complex needs of the Trust and its service users. Respondent (HBD and the Disabilities Trust) in their preparation of a planning application for a new Acquired Brain Injuries hospital at the former Terry's site, Bishopthorpe

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				Road, York. The application site is included as a draft allocation for housing in the emerging Local Plan. The site is expected to provide 56 residential units and continues to be supported by HBD. The contribution forms a small proportion of the housing supply provided in the plan and a small proportion of sites anticipated to be delivered in the third, fourth and fifth years of the plans as set out in the trajectory. As such, HBD continues to support the allocation of the site within the draft local plan; has no objection to the Proposed Modifications; and supports the housing supply position and trajectory which forms this consultation.
257	Henry Boot Developments Limited	Section 05 Housing	H1 Housing Allocations	The April 2021 Composite Modifications Schedule PM62-65 set out modifications to Draft Policy H1. PM63 relates to Table 5.1 of Policy H1 (CD001) (list of allocations) and includes a new reference (denoted by '*' symbol) for those sites which are in close proximity to a European designated site. Allocation ST16 is not included in this table, or in the previous 2019 Proposed Modifications table. As such, it is understood that Allocation ST16 remains unchanged from the original Submission Draft version i.e. Phase 3 Terry's Extension site- Land to rear of Terry's Factory remains allocated for 56 housing units. HBD does not therefore object to PM63.
257	Henry Boot Developments Limited	Section 05 Housing	H1 Housing Allocations	The updated SHLAA considers housing land supply position within York for the lifetime of the Plan. The supply position includes a significant supply arising from allocated sites, including a site controlled by HBD. Site allocation ST16, Phase 3 is anticipated to contribute 56 homes across years 3, 4 and 5 of the Plan. HBD are progressing a planning application for a non-residential use on this site. In the context of the significant number of site allocated and the assumed timing of the 56 units, were these units to not come forward, the viability and soundness of the Local Plan would not be effected.
257	Henry Boot Developments Limited	Section 05 Housing	Site Allocation ST16	The policy team note that there are no significant unresolved objections to this element of the policy and Historic England believe the policy to be sound overall, including proposed residential development at the former Terry's site. HBD agree with this position and agree that there is sufficient headroom within the housing land supply identified within the emerging local plan, including allocations and windfall allowances if the site was redeveloped for a hospital use
257	Henry Boot Developments Limited	Section 05 Housing	Site Allocation ST16	HBD maintains that ST16 must remain as a housing allocation and contribute to the housing land supply. The allocations included within Draft Policy H1 amount to almost 15,000 units, compared to an Objectively Assessed Need (OAN) of 867 dwellings per annum (dpa) in the Submission Draft Local Plan, an OAN of 790dpa in the 2019 Proposed Modifications or an OAN plus shortfall allowance totalling 822dpa in the 2021 Proposed Modifications, equating to approximately 17-19 years of supply through allocations alone.

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257	Henry Boot Developments Limited	Section 05 Housing	H1 Housing Allocations	Draft Policy H1 (CD001) is cautious in that it includes within its calculation of housing allocations the lower end of the scale for housing delivery of site ST5, York Central. York Central benefits from outline planning permission for 2,500 residential units. Site specific policy SS4 for York Central sets out a range of 1,700 2,500 units. However, an absolute figure of 1,700 units is presented in Policy H1. If Phase 3 of the Terry's site ST16 is not delivered for housing of 56 units, this is likely to be negated by the delivery of other sites e.g. York Central where up to 800 units more could be delivered beyond the housing supply identified in H1. As such, HBD believes that were Phase 3 of ST16 the Terry's Extension Site not delivered for housing, the soundness of the plan would be unaffected. Phase 3 of the Terry's Extension Site identified as likely to come forward in year-10 of the Local Plan.
257	Henry Boot Developments Limited	Section 05 Housing	H1 Housing Allocations	The SHLAA confirms the Council has adopted an OAN of 790dpa plus an allowance of 32 units per annum to make up a shortfall, resulting in a housing need figure of 822dpa (para 3.6). This results in a housing requirement of 13,152 within the plan period (16 years). Table 3 of SHLAA sets out housing allocations included within emerging Local Plan. This includes 56 units to be delivered by Terry's Extension Site Phase 3. Figure 3 has Detailed Housing Trajectory for York, setting out demand and supply for housing units to 2037/38. Units from Terry's Extension Site Phase 3 are shown to be delivered as follows: //18 units in 2022/23 //17 units in 2023/24 // 21 units in 2024/25// i.e. years three to five of the detailed trajectory.// Respondents Table sets out implications if on the housing trajectory if Phase 3 was not delivered. The table suggest the Trajectory in EX/CYC/56 shows surplus of delivery of 585 units above cumulative housing requirement of 4,932 units in 2022/23. This pattern continues in next 2 years of 2023/24 and 2024/25 with delivery exceeding the requirement by 1,608 units and 2,093 units respectively. This is confirmed as supply outweighs demand of 822 units per annum for each of the years presented above. If the Phase 3 site is not delivered, it would result minor reduction in supply of units. However, there will continue to be an oversupply above demand for each of the 3 years identified with a surplus of 567 units still to be delivered in 2022/23 increasing each year thereafter. The supply of housing land within the emerging Local Plan is such that if the 56 units are not delivered across three years, this will not materially impact on the deliverability of the plan including supply. Indeed, based on supply exceeding demand, if Site ST16 is not delivered for housing, it will not harm the requirement.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
257	Henry Boot Developments Limited	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York4	HBD does not wish for site ST16 to be removed from the SHLAA or Policy H1 and SS14, but confirms that if the site was not to be delivered for housing, rather for an acquired brain injury hospital, it would not have an impact on the soundness of the Emerging Local Plan. It is important that the site continues to form part of the housing land supply as it has the potential to provide an opportunity for housing delivery, particularly if the hospital proposal does not come forward. Therefore, HBD' s position and the allocation does not change.
257	Henry Boot Developments Limited	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York4	Respondents do not wish for site ST16 to be removed from the SHLAA or policy H1 and policy SS14, but confirms that if the site was not delivered for housing, rather for an acquired brain injury hospital, it would not have an impact on the soundness of the emerging Local Plan as a whole.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Delays to plan-making within York means plan is unlikely to be adopted until 2022 at the earliest, meaning the post-adoption timeframe will be less than 11 years. Not considered adequate to provide clear and effective framework to deliver much needed development within York. Para. 157 of the NPPF identifies that a 15-year timeframe is preferable. Council's departure from this is not explained. It is notable that the 2019 version of the is NPPF strengthened this requirement (para. 22) identifying strategic policies should look ahead over a minimum 15-year period post adoption. 2019 NPPF does provide requirement for strategic policies to be reviewed at least once every 5-years (para. 33). This may help rectify the situation. However, given recent history of plan-making within the city this is far from guaranteed.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	To overcome issue of extended time to get plan through the end date of the plan should be increased until at least 2037/38. This would have consequential impacts for housing, employment, and other allocations.

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260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Proposed amendments seek to clarify the proposed housing requirement as 822 dpa. Whilst the clarification is welcome the proposed requirement is considered too low and needs to be in excess of 1,000dpa. The proposed housing requirement is, therefore, considered unsound as it is neither justified nor effective. See further comment on housing need update EX/CYC/43a
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Re-assessment of the housing need over the whole plan period be undertaken. Housing requirement needs to be on excess of 1000dpa
260	Lovell Developments (Yorkshire) Ltd	Whole Plan	-	Respondent does not consider local plan sound, not justified or effective.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	When assessing the OAHN , it is impossible to analyse whether the need identified for period 2012 to 2017 is correct due to lack of comparative data. Given the most recent assessments in September 2020 and July 2019 are based upon 2016 and 2018 based subnational projections the figures are largely self-prophesising. This is because there are known populations, based upon the ONS published population estimates, incorporated into each projection from 2012 to 2016 and 2012 to 2018 respectively. It cannot be assumed that these fixed populations were reflective of need. Given the poor levels of delivery and lack of a local plan it is considered to be quite the contrary.
260	Lovell Developments (Yorkshire) Ltd	Section 05 Housing	H1 Housing Allocations	Client is promoting two adjacent omission sites (Former SF1/H30/Site 119) which can be delivered either together or independent of each other.

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260	Lovell Developments (Yorkshire) Ltd	Section 09 Green Infrastructure	G12A Strensall Common SAC	Respondent does not consider local plan is sound, document is not justified or effective. New policy G12A's 400m exclusion zone for residential development is applied without consideration to potential access to the SAC. The HRA (para. 4.3.212) bases the exclusion zone not on probable impact but on 'experience' from elsewhere, noting: "From experience around the country, a 400m distance has become accepted as a suitable threshold to restrict new development, one of which is supported by appropriate policies in land use plan (e.g.Breckland, East Devon, Cannock and Wealden amongst others)..." .
260	Lovell Developments (Yorkshire) Ltd	Section 09 Green Infrastructure	G12A Strensall Common SAC	If the common cannot be easily accessed from a site within the 400m exclusion zone, either via existing features or through scheme design, this should be considered in the development appraisal. Client is promoting sites which are either outside the exclusion zone or can be delivered to restrict access to the common.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider local plan sound, not justified, positively prepared, justified, effective, or consistent with national policy. Respondents key concerns include: Rate of jobs growth in Economic-led housing need is unduly pessimistic/ Market signals uplift should be applied to all scenarios not just the demographic starting point /Market signals uplift should be at least 25% / Assessment should cover whole plan period.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A more positive Rate of jobs growth in Economic-led housing need should be considered.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Market signals uplift should be applied to all scenarios not just the demographic starting point. Market signals uplift should be at least 25%.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider document to be sound, not positively prepared. Past rates of jobs growth it is notable, figure 13 (York Economic Outlook) that jobs growth over the period 2014 to 2018 was 1,110 jobs per annum, over 37% greater than anticipated in the equivalent 2015 study and over 70% greater than the 650 jobs anticipated each year in the Local Plan. Indeed the 2019 assessment anticipates greater jobs growth under all scenarios compared to the 2015 report (figure 13).
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Given past job growth increases it is unclear the 650 jobs per annum should not be retained. To ensure that housing and economic strategies are aligned any increase in employment aspirations would require a consequent increase in housing growth.
260	Lovell Developments (Yorkshire) Ltd	Section 05 Housing	H1 Housing Allocations	Respondent does not consider document to be sound, not positively prepared, effective, justified or effective. The SHLAA update provides an updated housing trajectory. This trajectory suggests that the majority of Housing Allocations (both H sites and ST) sites will commence delivery next year (2022/23). Given that many of these sites remain within the Green Belt and do not yet benefit from any form of permission this is considered highly optimistic.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider document to be sound. Unlikely the plan will be adopted until 2022. The likelihood of applying, gaining permission and starting on site within a year is extremely unrealistic, several of the allocations are unlikely to deliver their full plan requirement over the plan period (by 2032/33). This will likely to lead to a shortfall in delivery against the plan requirement and that upon adoption the Council will be unable to demonstrate a five-year supply.
260	Lovell Developments (Yorkshire) Ltd	Section 05 Housing	H1 Housing Allocations	More realistic lead-in times should be used - with delivery back by at least two more years

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
260	Lovell Developments (Yorkshire) Ltd	Section 05 Housing	H1 Housing Allocations	Additional allocations are required to ensure the housing requirement can be met and there is an adequate five year supply with no shortfall.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider document to be sound, not positively prepared, effective, justified, or consistent with national policy. It is notable that the Green Belt boundaries relating to the updated methodology remain virtually unchanged. The retrofitting of a methodology to known conclusion has inevitably led to bias in the conclusions.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The amended topic paper was also supposed to attempt to simplify and clarify the methodology. This has not been achieved. This is due to the constant cross-referencing with other documents and confusion of criterion against differing purposes.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are several areas where assessment appears inconsistent with the purpose. For example, in relation to 'Purpose 4: Preserving the Setting and Special Character of Historic Towns' there is continued reference to the Minster and views thereof. Whilst these are important in relation to the setting of the Minster the view in itself does not provide any interpretation of how the city has grown and as such are not considered part of the special character and setting of the historic town. There is also reference (para.8.27) to other 'Landmark Monuments' including boundary stones, herdsman huts and Roman camps. Without interpretation it cannot be assumed that land needs to be kept open to understand their significance nor that they assist in retaining the setting and special character of the historic town.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Purpose 1 relating to sprawl is applied inconsistently in the annexes . This is highlighted in the treatment of clients site Former SF1 and H30 in Strensall but is considered symptomatic of the Council's attempt to retrofit a revised methodology to existing conclusions.
260	Lovell Developments (Yorkshire) Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Confused description of client's sites (Former SF1 and H30 - Particularly Site 119) - (see table 6.1 of our associated report) Assessed in Annex 4 (Strensall). There is also no justification for the choice of boundary 4. The whole area being covered by a single Green Belt boundary despite there being two clear parcels bisected by the railway line. Boundary 4 is a 'horse-shoe' shaped section. The northern elements of which are bisected from the south by a railway line. The northern element in close proximity to the main settlement and has clearly defined boundaries on 4 sides. Whilst respondent consider all elements of the site can be developed without impacting upon the openness and character of the Green Belt, these variations suggest that the boundary should have been split into smaller sections. The inclusion of both parcels in a single boundary leads to an inappropriate assessment.
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound as it is not positively prepared and fails to allow for enough adequate land from the GB to be available to ensure that there is housing land available during and beyond the plan period to meet the housing need for the city.
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt	Section 03 Spatial Strategy	Policies Map (Green Belt)	The GB area (1-6), which includes proposal site, was considered for much larger sites in the sites preferred options sites. Does not feel this is justified as the proposal site is of a "modest" area.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt	Section 03 Spatial Strategy	Policies Map (Green Belt)	With regards to purpose 3, proposal site is located directly adjacent to the rear gardens of the properties of Stirrups Close, which forms a weak GB boundary. Were the site to be removed, the new GB boundary would be formed with Askham lane, which is lined by thick and tall intact hedgerow and would therefore create a much stronger and permanent GB boundary.
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With regards to purpose 4, an independent assessment of views towards York concluded that there were no locations beyond the outer ring road to the east west of York from which the minster or the edge of the city can be viewed from.
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt	Section 03 Spatial Strategy	Policies Map (Green Belt)	With regards to the permanence of the site, a review of historic mapping indicates that all the land in the vicinity of the site was historically farmland, and that there is no historic pattern of the GB which would add to its permanence.
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent requests the council reassess the proposal site in terms of the GB boundary as the land does not comply with the 5 GB purposes set out in para 134 of the NPPF.
267	York Diocesan Board of Finance Limited & The York and Ainsty Hunt	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent requests the proposal site is a suitable one and should be removed from the GB boundary to accommodate for future development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
269	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider document to be legally compliant as the new Village Settlement Boundary will be different from that of the Poppleton Neighbourhood Plan adopted by CYC 2017
269	Private Individual	Whole Plan	-	Respondent does not consider document to comply with Duty to Cooperate – Pre-consultation was not carried out with Upper Poppleton and Nether Poppleton Parish Councils and their Poppleton Neighbourhood Plan committee.
269	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Upper Poppleton/Nether Poppleton Green Belt Boundary 2 – The sites between Blairgowrie and All Saints Burch are all in the Upper Poppleton Conversation Area and been put into the Green Belt apart from Blairgowrie and the adjacent Field with its Barn, which remain within the village settlement boundary with no explanation given and justification for the different treatment
269	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst the other sites in the wedge have strengthened their protection with Green Belt status, this leaves the other two sites with weaker protection, thus being vulnerable to future housing development proposals from which they have been previously protected against for almost thirty years
269	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Blairgowrie is listed as a Housing Allocation in the Poppleton Neighbourhood Plan but makes clear that only one dwelling is acceptable – this should not prevent Blairgowrie being included in the Green Belt with the other Open Space sites.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
269	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The sites comprising the Open Space wedge in the 2005 Local Plan should be treated equally with the same level of protection - either all in the Green Belt or all kept within the Village Settlement Boundary
288	Wigginton Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the document sound, York has very special circumstances. It is a compact historic city surrounded by the green belt and views of the Minster. Wigginton Parish Council considers it of the utmost importance that the local plan is adopted in order for the green belt to be afforded protection. The delineation of the green belt is supported by Wigginton Parish Council.
288	Wigginton Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers document sound, Local Plan relatively low housing numbers would protect the green belt against further encroachment and would ensure that brownfield will be developed first.
288	Wigginton Parish Council	Whole Plan	-	Respondent considers document sound, Wigginton Parish Council considers that the City of York Local Plan should be adopted at the earliest opportunity.
298	New Earswick Parish Council	Section 05 Housing	Site Allocation H46	Does not consider the document to be sound or justified. Strong objections to the proposed development of H46. There is already a presumptive application for 117 properties on this last remaining area of open land and the significant construction of 104 units is already underway in New Earswick. P16,19,20 & 21 all have contradictions to the area being proposed for development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
298	New Earswick Parish Council	Section 05 Housing	Site Allocation H46	Page 16 Sites 18-68. Proposed housing on land adjacent to A1237 and junction with this and Haxby Road. Where will the road access be?
298	New Earswick Parish Council	Section 05 Housing	Site Allocation H46	Document is not fit for purpose and not justified. Does not show good judgement relating to H46 PM81.
298	New Earswick Parish Council	Section 05 Housing	Site Allocation H46	Proposed site (H46) is the only remaining area of open land in the village of New Earswick. Numerous objections made by residents during the process of the Local plan. Inconsistent with the green belt being reduced.
298	New Earswick Parish Council	Section 05 Housing	Site Allocation H46	Increased traffic congestion and loss of amenity spaces as a result of proposed development.
298	New Earswick Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Area of land, known as Old School Field, should remain as open land for the benefit of residents and visitors.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
304	Huntington and New Earswick Liberal Democrats	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers the document to be sound. Huntington and New Earswick Councillors support the minor changes to the green belt boundaries in the latest Local Plan proposals for Huntington.
304	Huntington and New Earswick Liberal Democrats	Section 05 Housing	Site Allocation ST18	Respondent confirms the objections made to previous Local Plan consultations with reference to the land described as Huntington South Moor and ST18. Objections in relation to the land being the only area of green land in south Huntington, increased volumes of traffic and poor drainage and sewerage problems. Respondent considers it inequitable for residents to have another development in their area and that the land is not suitable for housing development.
304	Huntington and New Earswick Liberal Democrats	Section 05 Housing	Site Allocation ST8	ST8 will add further pressures on infrastructure. The land currently acts as a water retention area with parts being under water at times of heavy rainfall. In terms of overall flood management for the York area, respondent claims it would be preferable for this land to be retained as green belt should housing number requirements be reduced.
304	Huntington and New Earswick Liberal Democrats	Section 05 Housing	Site Allocation H1 Housing Allocations4	Strong objections to any possible development at H14 with concerns to traffic congestion at the school and the railway crossing. Any building at this site will create access and ingress issues unless the allotments are sacrificed, which are a well-used and much appreciated local facility. Building on this site will also create the appearance of continuous urban development from the ring road all the way through New Earswick, thus losing the concept of the area being a garden village further.
304	Huntington and New Earswick Liberal Democrats	Section 05 Housing	Site Allocation H1 Housing Allocations4	Respondent believes that due to the considerable development Huntington and New Earswick have had in recent years, further development should be kept to a minimum.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
316	Dunnington Parish Council	Section 03 Spatial Strategy	Site Allocation H31	Does not support the proposed change to the GB boundary to remove land allocated as H31 from the GB. Submit that there should not be any change at all made to the Green Belt boundary in this location.
316	Dunnington Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes the plan has not been positively prepared as more suitable sites have been put forward during previous consultations/drop in sessions held by the Parish Council.
316	Dunnington Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the proposal for the Green belt boundary modification in respect of Derwent Valley Industrial Estate (A4:48)
316	Dunnington Parish Council	Section 03 Spatial Strategy	Site Allocation H31	<p>Does not consider the document to be sound: Strong objections to the proposed changes to the green belt boundary so far as it effects the village itself as shown on page A4:65; Object to the planning application of site H31 The proposed boundary change contradicts existing planning policy and guidelines relating to preventing urban sprawl; permanent Green belt boundaries; assisting in safeguarding the countryside from encroachment; preserving the setting an special character of historic towns. Removal of site H31 from the Green belt and its allocation for housing goes against the NPPF advice to promote sustainable patterns of development. The existing boundary around Dunnington is sensible, defensible and long established. The proposed intrusion into the countryside represents urban sprawl and undermines the existing logical green belt boundary.</p> <p>o According to the NPPF, Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The modification has not been fully evidenced</p>

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				and justified.
329	Murton Parish Council	Whole Plan	-	Respondent considers the document to be sound as the plan is in line with NPPF 4 tests.
329	Murton Parish Council	Section 05 Housing	Site Allocation ST4, ST7	ST7 and ST4 are of concern to respondent. The consultation period of the Neighbourhood Plan indicated the volume and speed of traffic was the most contentious issues for residents of Murton. These developments will inevitably lead to increased traffic in the parish. The two main access points for ST7, would be through Stockton Lane and Murton Way which will increase the traffic flow for the village of Murton.
329	Murton Parish Council	Section 05 Housing	Site Allocation ST4, ST7	In a Planning Inspectorate report in 2016, in which traffic was a major concern, inspector's report notes that the data produced by the city of York Council on traffic flows along Murton Way are both sparse and old (dating back to 2003). Respondent therefore finds it hard to justify development ST7, in particular, with the existing transport infrastructure. Hence, substantial improvements would be needed to the road for safety of cyclists and pedestrians and in the interests of local residents.
329	Murton Parish Council	Section 05 Housing	Site Allocation ST7	The viability of ST7 depends on a robust and independent transport assessment. The survey must address the potential impact on the wider network of rural roads on the east side before any decision can be made. Respondent believes the rural vision for the parish is lost with phrases within the plan that state "...level of improvement required, including the associated improvements/upgrades to junctions, carriageways and footpath widths etc.'

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
329	Murton Parish Council	Section 05 Housing	Site Allocation ST7	Murton is on the National Cycle network, Route 66, used by both leisure cyclists and commuters although 2 of the 3 do not have footpaths and the third has a width that only allows walking in single file. ST7 is likely to contribute further to the problems that cyclists face in the parish.
333	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers document to not have been positively prepared. With CYC presenting a view on how the village should grow without taking into account the social interactions already existing between the north and south ends of the village and how these could be enhanced.
333	Private Individual	Section 05 Housing	Site Allocation SP1	Respondent considers document to not be Consistent with national policy. The proposal to remove SP1 from Greenbelt (respondent previously objected) elsewhere in the Plan does not comply with the National Planning Policy Framework specifically "Policy E: Traveller sites in Green Belt" of the Planning policy for Traveller sites. This states that "Traveller sites (definition includes travelling show people) (temporary or permanent) in the Green Belt are inappropriate development." The planning inspector who granted a temporary consent on site SP1 said there were no exceptional circumstances why SP1 should be given a permanent consent and CYC should find suitable alternative sites which they haven't done and this is now the exceptional circumstance.
333	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The inset should run the length of the village from Sutton bridge to The Conifers (at Wheldrake lane).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
333	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Inset for Elvington should be extended to cover the village from The Conifers development through to Sutton Bridge, (see plan: EPC Green Belt Proposal) i.e. Boundary 1 should be extended west to the Conifers. (Appropriate wording for rewording of CYC Plan). This will ensure that the residential areas along section of Elvington Lane will be joined into the core of the village along with the doctor's surgery, sports and social club and playing fields which all exist between the existing proposed Boundary 1 and the Conifers. This will make the plan sound as it will be based on the socio and geographical evidence in the village.
333	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Respondent considers document to not be justified. CYC proposed Site 95 Elvington (allocated as H39) for removal from the greenbelt, to add a number of dwellings to existing residential estate. This has been both proposed by CYC in a previous Local plan and examined and rejected by the Inspector. It would make existing residential estate too large for a single exit and the site is contiguous with Church Lane, Elvington, part of which is in the Conservation area [Annex 1, Evidence 16] and which is referred to in the CYC plan as 'an integral part of the character of the village'.
333	Private Individual	Whole Plan	-	At no point during the original (and now new) Local Plan has there been formal co-operation with Elvington parish council, that statutory body elected by Elvington residents. Respondent is not aware of any formal visit by CYC officials to the village to establish the situation on the ground: inferences seem to have been taken from the observation of Google maps rather than the working of the village reality.
333	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Key residential areas to the west of the village centre and respondent believes that the building of residential houses between the two areas would help coalesce the Elvington community as a whole. The CYC proposal in this Greenbelt addendum would impose a formal division of the village against the wishes of the community. The inset should run the length of the village from Sutton bridge to The Conifers (at Wheldrake lane).
333	Private Individual	Section 05 Housing	Site Allocation H39	Respondent considers document unsound. The hedgerow of Church Lane is a designated SINC (E50) in the York Biodiversity Action plan for Life. Why is this site (H39) is being proposed again: the arguments against it remain the same.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
333	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Boundary 3 Elvington should be refigured so that the conservation area designated along parts of church lane are in Green belt and not classified as inset. This will make the Plan sound bringing together conservation designations viz SINC (E50) designated in the York Biodiversity action plan and CYC green belt designations.
333	Private Individual	Section 05 Housing	Site Allocation H39	Respondent considers document unsound. The original proposed Site 55 would be a more suitable site with space for more houses (Former H26, sited next to Elvington primary school). Respondent, along with many other residents and the Parish Council , supported this site but it was not accepted by CYC despite having been originally "set aside" for development from the days of Selby DC. CYC reasoning for not including this site is based on the erroneous supposition that this site provides the break between the residential and non residential (so called 'outlying Business Park') parts of Elvington village. This is not borne out by fact and therefore is not justified. There are significant residential areas and amenity activities of the village in the area west of Boundary 1 including the medical centre, sports and social club and playing fields as well as a poorly maintained woodland with derelict RAF munitions stores.
333	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Site 95 (Allocated as H39) should not be removed from the Greenbelt as it would spoil the quintessential rural nature of Church Lane and would render Becksides more of a large and disproportionately sized housing estate not in keeping with the rest of the village. Again this ensures soundness of the CYC Plan and follows previous rulings by the national Inspector.
333	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believe they and many other residents of Elvington village are not opposed to appropriate development, and Elvington PC has already proposed site H26 to be removed from the Green Belt as this offers the chance for more homes to be built of various sizes to cater for the demand for both starter and larger family homes which are under-represented within the village; development on this site would have virtually no visual impact upon the village and minimal environmental impact (including ease of walking children to school).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
333	Private Individual	Section 05 Housing	Site Allocation H39	Respondents comments on Site 55 (H26) are dependant on further development of ST15, this proposed 159ha "Garden Village", with 3339 dwellings, currently abuts Elvington Parish Boundary. Given the size, if Site 55 goes ahead then there seems to be no justification for building in Elvington (i.e. H39). The CYC plan acknowledges the importance of Elvington in retaining its rural character, and thus making a contribution to the overall York environment, with 'it's clock face of smaller compact villages'.
333	Private Individual	Section 05 Housing	Site Allocation SP1	SP1 to remain in the Greenbelt as it is not compliant with National planning Policy.
338	Private Individual	Whole Plan	-	Respondent considers the document to be sound as the proposed modifications have been positively prepared and are justified.
338	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the revised Green belt boundary (2019 modification PM33), which will serve to preserve the environmentally valuable ridge and furrow fields known as Osbaldwick meadows, in combination with the adjoining candidate SINC site, for the benefit of the local community and wildlife conservation. It will also protect the fields from developments such as those currently proposed by developers.
338	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent suggests no modification to the document, instead noting the desire to implement the proposed modifications.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
339	Barratt David Wilson Homes	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails on all 4 tests of soundness.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has concerns regarding the council's approach to establishing the area's housing requirements (CYC_36, CYC_43a, CYC_56). Council's emerging trajectory also shows a housing shortfall over the plan period.
339	Barratt David Wilson Homes	Section 05 Housing	Site Allocation ST7, ST14	Either more sites need to be allocated or more housing needs to be allocated on sites which have already been identified. Respondent refers to sites ST14 and ST7.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent has no significant concerns regarding the methodology overall, it has not been applied correctly to some sites including land at ST11 and ST7. The plan is unsound as some draft policies and evidence base fails to meet the tests of soundness outlined in para 35 of the NPPF.
339	Barratt David Wilson Homes	Section 05 Housing	Site Allocation ST11	Allocate land at New Lane, Huntington for 300 dwellings (ST11)

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to the council's approach to allocating land as Green Belt due to the presence of heritage assets and the revised methodology seeks to retrospectively justify this through a new approach. Any allocation rather than historic setting of the city is unsound.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to criteria 1, respondent believes the assessment of this criteria has not been carried in the simple manner intended.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to criteria 2, respondent believes that to fully understand the criteria, the council should define what a landmark building is. To apply the tests to all heritage assets would diminish the description of landmark building.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to criteria 3, the questions are considered very generic, are subjective and provide no guidance for assessment to be made. Question 3.1 is so open ended, allowing the decision maker to determine any land is necessary simply because it is on the edge of York.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to purpose 1, respondent disagrees with the council's statement in para 8.32 that it is possible to argue all GB prevents the unrestricted sprawl as otherwise by definition the boundaries would never change.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to section 10, the timescale is not considered long enough. At present the plan is almost five years behind adoption from its start date of 2017.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to section 10, if no safeguarded land is allocated there is no ability to react if housing delivery is insufficient. nearly all local authorities in the surrounding area have allocated safeguarded land in their plans and York should do the same.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST11. With respect to compactness, the site is surrounded entirely on three sides, including a new football stadium to the east. There is no rational way that the site can be described as making up part of the wider countryside setting of York.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST11. The assessment states that this is an important site separating the residential development from the retail/commercial development at monks cross. Respondent objects to this. North of the site is adjacent to a small residential estate immediately abutting commercial development, itself adjacent to further housing.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST11. With respect to Landmark monuments, long distance views have already been removed by the development of the new stadium, with no concern by the council over its impact on the minster.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST11. Respondent finds the assessment for land mark monuments, misleading as it references Monk Stray and views of the Minster from that location, which is to the south of the road and outside the assessment area. Demonstrates the council's misunderstanding of setting a GB boundary for the first time.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST11. With respect to landscape and setting, the council's assessment is flawed. landscape officer has no objections to the development of the site, references to camps and ridge and furrow fields do not warrant GB designation and comments on it being historically undeveloped land are redundant with respect to the completion of the football stadium.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST11. With respect to encroachment, whilst the land is a field, this applies equally to every field in the city. It's context is an infill site surrounded by large development.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST11. This site should be assessed the same s all others and the methodology applied fairly.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to land at Manor heath, Copmanthorpe, the site was shown to have no contribution to any purposes of the GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Land at manor Heath should be reinstated in order to deliver the housing needs requirement for the city.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST7. Respondent objects to the current boundaries. This land makes no contribution to the purposes of GB and as such should either be white land or included in the allocation.
339	Barratt David Wilson Homes	Section 05 Housing	Site Allocation ST7	ST7. This land should be reinstated as it can deliver the housing need required for the plan period.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST14. Respondent objects to the allocation of the boundary with respect to ST14.
339	Barratt David Wilson Homes	Section 05 Housing	Site Allocation ST14	ST14. This land should be reinstated as it can deliver the housing need requirement.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that whilst windfall housing can make a contribution to a local authority's housing supply, there should not be an over reliance on this type of housing. Relying on windfall housing is not an effective housing delivery solution and therefore does not contribute to effective plan making in accordance with para 35 of the NPPF.
339	Barratt David Wilson Homes	Section 05 Housing	H1 Housing Allocations	Clear from York's low level of housing supply in recent years that the housing delivery strategy instead needs to focus on delivering allocated housing sites, rather than continuing to rely on windfall housing sites.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to the council's decision to address the housing shortfall in recent years over the course of the plan period using the Liverpool method.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is clear that some of the housing is not deliverable in the timescales shown, which will result in an undersupply of both market and affordable homes in the plan period.
339	Barratt David Wilson Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council should choose to address the housing shortage within the first five years of the plan period. This can be achieved by allocating more housing sites or increasing the capacity of the existing sites that have been identified.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
339	Barratt David Wilson Homes	Section 05 Housing	H1 Housing Allocations	Respondent objects to the housing trajectory which should not be used as a generic list of sites attributed to dates to show how homes could be delivered, it should be evidenced and justified. The lead in times on many of the sites are clearly over estimated and not deliverable, in turn resulting in homes being pushed out of the plan period.
342	Private Individual	Whole Plan - Sustainability Appraisal	-	Respondent considers some of the procedural requirements are flawed such as the SA.
342	Private Individual	Whole Plan	-	Respondent considers CYC have agreed with other LA's to not cooperate in the production of Local Plans which will fail to properly mitigate the impact from development that relies on cross boundary services and infrastructure.
342	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the plan fails to protect the character of Wheldrake village, which is an important element in the overall historic setting and character of York. 'The character of Wheldrake retains the strongly rural, pastoral character of a linear village founded in agriculture. It exhibits a classic medieval village 'toft and croft' layout, of houses set in their own enclosed field or grounds. Its legacy of historic buildings and the qualities of its streetscape also generate a distinct sense of place, of arrival from the isolated countryside. The medieval form and layout of the village survives, with long narrow plots of lands extending from Main Street to the 'back lanes', North Lane and Back Lane South. The latter retains its open setting beyond, but residential development now comes right up to much of both back lanes, and extends further beyond North Lane in small residential estates, and offer little more than glimpsed views within and around the village'

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to the inclusion of ST33 as within the urban parcel of Wheldrake. The South side of Wheldrake is described as having an open setting beyond Back Lane South and strong rural agricultural character, therefore any development or change of green belt boundary on that side of the village (boundary 1&5) would completely erode the character as it already has on the North side of the village and it would also impact upon the conservation Areas of main street and back lane south.
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the Green Belt Boundaries as depicted in the 1995 York Green Belt Local Plan and CYC 2005 Local Plan adopted for development control purposes as setting the detailed boundaries and extent of Green Belt in York. The respondent states boundaries were defined through the York green belt local plan and public inquiry report in the mid 90's which was approved and adopted by North Yorkshire County Council in 1995 as an interim policy for development control purposes. Under the Planning and Compensation Act of 1991, this did not require the approval of the Secretary of State although they did still retain power to intervene where they did not agree. This is further reinforced with the Secretary of States approval of neighbouring Local Plans that all make reference to this adoption of the York Green Belt Boundaries as interim policy for example the Harrogate Local Plan states:- 'Green Belt between Harrogate and Knaresborough and along the southern boundary of the district was originally established by the West Riding County Development Plan: First Review (1966). CYC's 2005 Adopted Local Plan for the purposes of Development Control states in Chapter 5:- '5.10 Whilst remaining broadly consistent with the draft York Green Belt Local Plan, the Local Plan has taken the Inspector's report to the York Green Belt public inquiry as its starting point for the consideration of detailed boundaries and has updated existing policies to take into account the revised guidance contained in the latest version of PPG2 (1995) and the approved Structure plan'. With site specific detail of that report listed in Appendix J of the 2005 York Local Plan.
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Current Wheldrake boundaries 4/3/2 depicted incorrectly in Annex 4, land North of North lane (H28)/D80 in Appendix J is not included in the Green Belt and including it would therefore be creating New Green Belt with no justification and no compliance with point 82 of the 2012 NPPF.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 5 , the respondent considers the proposed changes to the South Eastern boundary and inclusion of ST33 unjustified and not compliant with points 87 and 88 of the 2012 NPPF, especially with land already not included in the Green Belt and previously allocated for housing such as land North of North Lane (H28).
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 5 description is missing some key information:- No mention of the boundary running along Back Lane South from the properties on the corner of Main Street/Back Lane South to join up with Boundary 1. Both main street and back lane south are conservation areas, where the latter retains its open setting as soon as you pass those properties. The historic setting and character of York also extends to the individual characteristics of its surrounding villages and it is therefore just as important to protect these individual characteristics.
342	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Respondent considers the section depicting specific site boundaries flawed and incomplete. Dates are not consistent, for example Site11/H28 was allocated in 2013, site 13/H49 and 817/H39 were previously rejected, site 817 did not take part in the further sites consultation as it was submitted at the close of business on the last day of that consultation period. Respondents consider the 'see 855' as a deflection tactic, as to not highlight these rejections, and that site 855/ST33 does not exist. Its existence has been raised numerous times before and now CYC confirm the same in the SHLAA (included in respondents other representation).
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site 600/E8 (on boundary 4/5) is allocated for employment but again doesn't exist as the Landowners have now turned into a woodland area because it can't be developed on due to the water main running under it.
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site 701 is missing but it is the south eastern corner of the industrial Estate and has now had some development on it to the existing Industrial Unit (18/02128/FUL).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site 599 is incorrect, it did not take up the whole southern area of the industrial Estate and it was previously allocated as E7 but that was removed and combined with Site 701 and H49/13/817 to create ST33/855 however E7/599 has since become an employment site as indicated in the SHLAA.
342	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that now there is no employment sites, no development can be considered to be sustainable within Wheldrake as per the NPPF:- '103. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health'. -'104. Planning policies should: (a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education, and other activities;'
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The whole Wheldrake section in EX/CYC/59f needs rewording, given that ST33 does not exist and the land north of North Lane does not exist it could just be as simple as using the boundaries already suggested, adding H28 as previously allocated and the land is not within the green belt, and removing ST33. Especially as it suggests that the land is already open and would encroach into the open countryside, it also indicates that the hedgerow along the longest side is not a defensible boundary as any development there would need to significantly reinforce that boundary and landscape it out from the open countryside.
342	Private Individual	Whole Plan	-	Respondent does not consider the local plan to be sound, found it to not be positively prepared, effective, justified, and not consistent with national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers ST33 to not exist, with the SHLAA drawing attention to this under the recent planning application hearing:- 'N.B. Application 20/0071/FUL for the change of use of outdoor area to play area in association with use of building as a nursery, including the erection of 4no. outdoor classrooms, perimeter fence and installation of 3no. doors to south elevation that forms part of the larger site was approved in July 2020 (this will affect the boundary and capacity of the draft allocation?).'
342	Private Individual	Section 05 Housing	Site Allocation ST33	In addition to Planning Application ('N.B. Application 20/0071/FUL'), immediately after submission of the Local plan 2018 there was also 18/02128/FUL for an extension to an existing Industrial Unit within the ST33 site boundary. In previous consultation submissions it has always been maintained that this site does not actually exist and the only reason it came about was to expand H49 into a strategic site to avoid the under 5ha site assessment as per the Site Selection Flow Diagram as comments had already been raised as to its sustainability score and significant holes in that had already been presented. When respondent presented this argument to a Planning Officer at one of the previous drop-in sessions, they confirmed this was the case.
342	Private Individual	Section 05 Housing	Site Allocation ST33	Concern over the allocation of ST33 (Originally referenced as H49). - Under ID354 of the 2018 Consultation Response, respondent does not see any comments submitted that relate to the developable area, however amendments were made to the size of H49 to finally get it over the line having previously rejected on numerous occasions, there are numerous references to the developable area as been 3.9ha of the H49's 4.7ha site submission with the remaining 0.8ha been used to screen out the anomaly as described in the 2021 TP1 Addendum Annex 4, the Industrial Estate that is already screened out. Clearly the 147 dwellings is also flawed as 147 over 70% of 3.9 would be 54dph which is significantly over the allowed 35dph as per Policy H2. This would only allow for 96 dwellings and would impact the scoring the sustainability appraisal and hence why the site was increased to 6ha by adding on land enclosed within the perimeter of the Industrial Estate. Given the question of the actual site boundary is raised within this document it clearly can't be said to be Positively prepared, justified, effective, or consistent with national planning policy as it does not allow for ambiguity.
342	Private Individual	Section 05 Housing	Site Allocation ST33	Wheldrake, ST33 needs to be removed as it does not exist, it should Not be replaced with the original H49 proposal either but instead replaced with H28, land to the north of North Lane as that is not in the Green Belt as per the comments in respondents other submissions to this consultation page.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
342	Private Individual	Whole Plan	-	Respondent considers document to comply with duty to cooperate in so far as CYC have agreed with other LA's to not cooperate in the production of Local Plans which will fail to properly mitigate the impact from development that relies on cross boundary services and infrastructure.
342	Private Individual	Whole Plan	-	Respondent does not consider the local plan to be sound, found it to not be positively prepared, effective, justified, and not consistent with national policy.
342	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the plan fails to protect the character of Wheldrake village, which is an important element in the overall historic setting and character of York. 'The character of Wheldrake retains the strongly rural, pastoral character of a linear village founded in agriculture. It exhibits a classic medieval village 'toft and croft' layout, of houses in set in their own enclosed field or grounds. Its legacy of historic buildings and the qualities of its streetscape also generate a distinct sense of place, of arrival from the isolated countryside. The medieval form and layout of the village survives, with long narrow plots of lands extending from Main Street to the 'back lanes', North Lane and Back Lane South. The latter retains its open setting beyond, but residential development now comes right up to much of both back lanes, and extends further beyond North Lane in small residential estates, and offer little more than glimpsed views within and around the village'
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The South side of Wheldrake described as having an open setting beyond Back Lane South and strong rural agricultural character, therefore any development or change of green belt boundary on that side of the village (boundary 1&5) would completely erode the character as it already has on the North side of the village and it would also impact upon the conservation Areas of main street and back lane south.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
342	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Green belt boundaries were defined through the York green belt local plan and public inquiry report in the mid 90's which was approved and adopted by North Yorkshire County Council in 1995 as an interim policy. Under the Planning and Compensation Act of 1991, this did not require the approval of the Secretary of State although they did still retain power to intervene where they did not agree. This is further reinforced with the Secretary of States approval of neighbouring Local Plans that all make reference to this adoption of the York Green Belt Boundaries as interim policy for example the Harrogate Local Plan states:- 'Green Belt between Harrogate and Knaresborough and along the southern boundary of the district was originally established by the West Riding County Development Plan: First Review (1966). With respect to the boundaries on the West Yorkshire Green Belt approved as part of the Harrogate and Knaresborough Local Plan, a slight amendment has been made to exclude the site of the former Pannal Auction Mart, now the North Yorkshire County Structure Plan. The detailed boundary of this Green Belt has been defined through the York Green Belt Local Plan, approved by the County Council in March 1995 as interim policy for development control purposes'. In addition to the neighbouring authorities Local Plans approved by the secretary of state, the CYC's 2005 Adopted Local Plan for the purposes of Development Control states in Chapter 5:- '5.10 Whilst remaining broadly consistent with the draft York Green Belt Local Plan, the Local Plan has taken the Inspector's report to the York Green Belt public inquiry as its starting point for the consideration of detailed boundaries and has updated existing policies to take into account the revised guidance contained in the latest version of PPG2 (1995) and the approved Structure plan'. With site specific detail of that report listed in Appendix J of the 2005 York Local Plan.
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Current boundary (4/3/2) depicted incorrectly in Key Diagram, land North of North lane (H28)/D80 in Appendix J is not included in the Green Belt and including it would therefore be creating New Green Belt with no justification and no compliance with point 82 of the 2012 NPPF.
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 5 , the respondent considers the proposed changes to the South Eastern boundary and inclusion of ST33 unjustified and not compliant with points 87 and 88 of the 2012 NPPF, especially with land already not included in the Green Belt and previously allocated for housing such as land North of North Lane (H28).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
342	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	In respect of Wheldrake the Key Diagram should be as proposed in the 2013 Diagram.
344	National Grid	Whole Plan	-	Respondent has identified that one or more proposed development sites are crossed or in close proximity to the client's assets.
344	National Grid	Section 05 Housing	Site Allocation ST9	Respondent identifies ST9 - North of Haxby as a site that conflicts with the clients' assets. The plan provided is illustrative however, with respect to the site, the north west boundary of the site runs alongside electric assets and is in close proximity on others.
344	National Grid	Section 05 Housing	Site Allocation ST1	Respondent identifies ST1 - British Sugar/manor School as a site that conflicts with the clients' assets. The supporting plan is illustrative but with respect to the site the north and west boundary of the site is penetrated by the electric assets of the client.
344	National Grid	Whole Plan	-	With respect to the electricity assets, developers of sites crossed or in close proximity to national grid assets should be aware that it is National Grid Policy to retain existing overhead line in-situ. Statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
344	National Grid	Whole Plan	-	With respect to gas assets the client's approach is always to seek to leave their existing transmission pipelines in-situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-pressure Gas Pipelines. The client has land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	When the Local Plan was submitted for examination it included allocations ST35 and H59 the Council must have been satisfied that it was sound at the point of submission. It is unnecessary to delete ST35 and DIO consider the Plan can be made sound with modifications to Policies SS19 and H1 which clarify the approach that is required in respect of SAC related mitigation
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	The drafting of SS19 could be 'tidied up' and better linked to other policies including those related to contamination, flood risk, and transport matters.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	Deleting the text relate to provision of a primary school and on site community facilities in Policy SS19 is proposed in favour of relying instead on the mitigation approach under HW2.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	Amendments to Policy SS19 should be made to include reference to habitats mitigation measures including provision of at least 12ha of public open space, including at least 8ha of natural and semi-natural green space, providing a 4ha area of natural, alternative green between ST35 and Howard Road with robust boundaries to prevent the alternative green space from being used as a route into the SAC from ST35; a circular walk within the site with a minimum length of 2.5km; a green buffer between any new homes and the boundary of the SAC and providing boundary and edge treatments to the boundary with the SAC which maintain separation between residents and the SAC; marking the SAC with fencing and limiting direct site

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				access. Inclusion of references to other mitigation actions to manage recreational pressure including signage, monitoring use/ conditions of barriers and a wardening service is also proposed.
345	Defence Infrastructure Organisation	Section 05 Housing	H1 Housing Allocations	DIO object to footnote to Policy H1: Housing Allocations as it relates to Strensall SAC.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	It is proposed SS19 should be amended it to require planning applications to be accompanied by Habitat Regulations Assessment which considers the potential harm to the integrity of Strensall Common SAC, determines whether mitigation measures need to be implemented and requires such measures are implemented prior to occupation. The buffer and boundary treatments from Scott Moncrieff Road to Ox Carr Lane should be referenced.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	The Plan can be made sound with modifications to Policies SS19 and H1 which clarify the approach that is required in respect of SAC related mitigation.
345	Defence Infrastructure Organisation	Section 09 Green Infrastructure	GI2A Strensall Common SAC	There is no evidence to justify PM70 and that proposed Policy GI2A is not required to make the Plan sound and should therefore be rejected. This is because DIO considers the HRA is flawed and does not address whether housing development should be allowed within 400m of the SAC.

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345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The provisions of Policy SS1 of the Local Plan, and its supporting text, as proposed to be modified, does not provide the evidence required to explain the approach that the Council has taken to the site selection process, and the description provided in Section 9 of the TP1 Addendum is opaque
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	DIO calculates the housing requirement to be 1,040dpa compared to 822 by the Council. Over the 15 year plan period, this equates to a difference of 3,270 new homes suggesting a need to adjust the Green Belt boundaries further, to accommodate the additional growth required.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Use of the 2016-based projections to calculate OAN for housing constrains housing supply and 2018-based projections would constrain it further.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement should be set at a level not lower than 1,040 dpa. The Council should use 2014-based projections better reflect housing delivery rates and population change.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	If the 2016-based projections are used (instead of the preferred use of 2014-based projections), upward adjustments should be made to account for market signals to elevate the OAN to a level that can address affordable housing need and to ensure that sufficient homes are provided to meet wider employment growth aspirations.

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345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Assumptions have been applied inconsistently particularly in respect of migration, undermining assessment method employed and impacting on the soundness of the Council's overall approach to OAN matters.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The use of only one economic-led scenario is inadequate . It does not reflect the potential for additional employment growth based on alternative trends since 2000 and leads to a reduction in expected jobs growth and suppression of the OAN.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There has been no update to the Council's evidence on market signals or affordable housing, nor any explanation as to why this hasn't been produced despite affordability worsening in York.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Delivery of affordable housing has fallen significantly short of what has been needed every year since 2012. The 32 dpa adjustment that is proposed to account for under-delivery since 2012 will do little to meet housing needs.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The affordable housing need identified of 573 dpa is a significant under-estimate given the difficulties that households currently living in the private rented sector have in respect of access to home ownership. No examination of the issues faced by those in the private rented sector has been included nor explanation as to why this it has been omitted.

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345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has made a number of general comments about housing land supply in previous representations and these remain relevant.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The amended HRA (October 2020), has only now been published and consulted on. Respondent was not engaged in this work as committed to at the Hearing Sessions. Respondent is still committed to working with the Council and Natural England to define and deliver a package of mitigation measures.
345	Defence Infrastructure Organisation	Section 05 Housing		Local Plan should facilitate housing delivery on redundant brownfield land and find solutions to the problems that are holding it back, with reference to Queen Elizabeth Barracks which will become vacant
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA does not set the existing use of the Common in any form of relevant context. The number of visitors for recreation per annum are unknown, Respondent's attempt an estimate of c 124,000 visits while not without limitations is used in the HRA and is the best available estimate. By comparison there were 1.7 million visits to for Cannock Chase SAC in 2010-2011 calculated by Footprint, putting into context the scale of the issue at Strensall. At Cannock Chase mitigations measures, like the ones being proposed by the respondent, are being implemented and are proving effective.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA wrongly assumed that any increase in use of the SAC for recreation poses an unacceptable risk to its integrity. Footprints Cannock Chase Report acknowledge visitors were not adversely affecting the integrity of the site and that existing levels of visitor pressure should therefore be regarded as the baseline with risk is that the site could become adversely affected from increased recreation pressure, rather than increased pressure would lead to further deterioration

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345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The combined Footprint / PCP data referenced in the HRA suggests that if all allocated sites within 5.5km of the SAC were built out this would equate to additional 29,000 visits per annum, a 23% increase. If Sites H59 and ST35 were built out, this visits would increase by 14.6; If only Site H59 were to be built out, visits to the Common would increase by 1.2%. No estimate is available for sites 5.5km and 7.5km and it is this is because the forecast would be for a de minimis level of increase of well below 1%. Surveys indicate half of visitors travel to the SAC by car (taking them into the SAC via the car parks), the overwhelming % of visitors travel more than 500m to get to the Common and a not insubstantial % of visitors travel more than 5km. This must mean the majority of additional visits will be repeat visits by a relatively small number of people. This is helpful when it comes to designing mitigation measures and assessing how effective they are likely to be.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA fails to take proper account of the small number of points of access into the SAC. The sites will not be permanently open to the public without restrictions. Access to the military training area south of the site is completely prohibited. This training area is not being disposed with QEB. Further if everyone accesses the protected site via a single point, it is difficult to assert, as the HRA does, that people who live within 400m of a protected site are more difficult to control than people who live more than 400m away.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA is out of date as it records that parts of the SAC are in favourable and parts in unfavourable – recovering condition. Natural England’s assessment earlier this year (prior to publication of the HRA) concludes that all components of the SAC are now in favourable condition. The MoD’s management of the SAC in line with its responsibilities under various legislation and the work of the tenant farmer (both in conjunction with Natural England), has resulted in the condition of the Common improving. This has been achieved without direct visitor management / control or any of the mitigation measures that are being offered in association with the development of Sites ST35 and H59
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA does not catalogue, quantify or provide dates for the ‘incidents’ or issues that it notes have occurred on the Common has been totally reliant on Footprint’s anecdotal evidence.

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345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		As far as the respondent is aware, there is no log of 'incidents' that have occurred within the SAC and records kept by the Conservation Group indicate that, over the last 10 years, there have been up to 8 fires, two incidents of unauthorised vehicles and several incidents of sheep worrying and sheep theft, although only one report of worrying since 2013 and no thefts since 2014. The SAC is therefore resilient to recreational use and the risk of recreational use causing harm to its integrity is low.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		While there has been inappropriate behaviour on the Common none of this has impacted adversely on it and there have been a very small number of incidents over a long period of time, rather than frequent and repeated abuse of the SAC.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA identifies the correct legal tests to be applied but fails to apply appropriate professional judgements when addressing itself to the tests and appears confusing 'beyond reasonable scientific doubt' with 'absolute certainty as to lack of effects'. The HRA has wrongly assumed that any increase in use of the SAC for recreation poses an unacceptable risk to its integrity leading to a conclusion that wherever there is potential for development to give rise to a measurable increase in use, this increase must be mitigated implying that either the increase in use is prevented altogether, or is managed within the SAC itself. This goes back to the difference between 'reasonable scientific doubt' and 'absolute certainty'.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRAs assessment of the likely efficacy of mitigation measures taken in combination is almost non-existent and flawed. Judgements lack consistency and are overly pessimistic when it comes to mitigation measures being offered in association with Sites ST35 and H59 including information boards, car parking barriers and wardens – assessing these in isolation rather than cumulatively. Fair and reasonable analysis of mitigation measures in the light of the use and condition of the Common, will confirm that the measures proposed are more than adequate to mitigate against inappropriate behaviour to the extent necessary to protect the integrity of the SAC

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345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA makes incorrect assumptions are made about the extent warden activity proposed, and the costs of this in perpetuity (a matter more appropriate to consideration through development management planning obligations).
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		All the HRA needs to concern itself with is whether a wardening scheme could adequately mitigate the additional visits by the residents of ST35 and H59. This is forecast to be the equivalent of 14.6% of existing visit numbers. Based on the fact that 100% of existing visits give rise to a very small number of 'incidents', a 14.6% increase could be expected to generate less than one fifth of those encountered to date. Managing up to 14.6% of existing visitor numbers is plainly well within the capability of a warden or wardens
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	A wardening scheme would have benefits that go way beyond controlling the additional visits flowing from ST35 and H59. It would manage all existing visitors including those expected from the other developments that are contemplated in the Local Plan. Only the respondent can deliver this mitigation measure and this wide-ranging benefit.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA does not acknowledge that the level of assessment required at the plan making stage is less than would be required for a planning application and does not apply its judgements in a way that is appropriate to the Plan-making process.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA raised potential issues with typical and other species without assessing whether harm caused to these would in turn cause harm to the qualifying features of the SAC. The qualifying features are its wet and dry heaths; it is not designated for any qualifying species. If harm to typical and other these would not demonstrably impact on the integrity of the SAC it is not a matter for the HRA and therefore erode the HRA grounds for removing ST35 and H59. The concerns raised about the Dark Bordered Beauty Moth and certain species of bird, for example, are misleading

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345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA has assumed that it is only possible to develop ST35 with homes backing on to the SAC. The respondent has considered alternatives as illustrated in the Planit.ie document (plans are supplied with the submission). These include boundary and edge treatments that will prevent indiscriminate access to the Common, limiting access to via Scott Moncrieff Road (where the HRA admits there would be much greater ability to control behaviours). This would force most residents to walk more than 400m to access the Common and would be made even more robust with a wardening scheme.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		Delivery and maintenance of boundary and edge treatments proposed by the respondent as illustrated by Planet.ie could be secured over the long term via planning obligation and if necessary MoD could retain ownership of the edges of the sites and manage them as part of its management of the Common.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		No evidence is provided to support HRA findings that 'urban edge' effects being more likely to arise when development is allowed within 400m of a protected site. While people who live on the edge of a protected site are more likely to visit it (than those further away), there is no evidence demonstrating that the main perpetrators of SAC abuse live within 400m of protected sites nor evidence existing residents within 400 m have been responsible for the small number of inappropriate incidents that have occurred. People who live adjacent to a protected site are more likely to understand rules on use and value it.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		Contrary to what the HRA says, Footprints 2019 Report, did not state that adverse effects on the SAC could not be ruled out on the back of increased use of it. It stated that adverse effects on the SAC could not be ruled out without mitigation. It then went on to suggest a number of mitigation measures that might be appropriate.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		Respondent has re-evaluated measures related to managed access and has concluded that it is not necessary to erect fencing aimed at deterring dogs from entering ponds to safeguard the integrity of the SAC as previously proposed 2019 submissions responding to a 2019 Report by Footprint. Further assessment has revealed trampling creates the bare margins that Pillwort aquatic fern, one of the SACs typical species, thrives on and removes other plant species that compete for the same ground. Erecting fencing around the ponds to keeping dogs away may

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				have some ecological benefit but doing would also prevent access by livestock, to the detriment of the Pillwort. So this mitigation measure is no longer proposed.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA asserts that while information packs can be helpful 'reasonable doubts' exist regarding the effectiveness and reliability long term. Whilst DIO accepts that there is no hard evidence effectiveness, there is equally nothing to suggest that they do not have a positive role as part of a wide package of mitigation measures.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA dismisses the effect that on-site public open space can play in reducing the number of visits to the SAC due it not being larger big enough for long walks or letting off leads, not being as attractive given a location near a major road and will not be management in perpetuity. However, the Planit.ie document appended to the DIO HRA clearly illustrates the open spaces that the sites are capable of delivering could accommodate long walk routes and could be designed to be attractive and is not located near a major road.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		On site open space would be more convenient to residents than the SAC and capture some of the recreational use that would occur within the SAC if such spaces were not provided. As the HRA forecast such a high percentage of recreational visits to the SAC from the QEB sites, the open spaces within these sites need only divert a small number of people to make a significant difference.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		Footprint's assessment of alternative green spaces is inconsistent. For Strensall SAC, it argues that green spaces on the periphery of the SAC are unlikely to be effective, yet at Burnham Beeches SAC, Footprint has said "the ideal SANG-type approach could well be provision of land near the periphery of Burnham Beeches, providing a dedicated area for dog walking and further visitor facilities, essentially buffering the core part of the SAC". It is not unclear why Footprint is taking a contradictory stance in respect of Strensall Common, particularly as there is little public open space in the village and the green space proposed for QEB would sit between the SAC and existing housing

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345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA notes bylaws are in place but that these are not always adhered to or effective. This fails to acknowledge that there are not enforced and that a wardening scheme would enforce these. Legal controls can have a positive effect, for example, Control Orders and Public Space Protection Orders at Burnham Beeches have led to a reduction in incidents as reported by Footprint. MoD has now begun the process of reviewing and updating the Bylaws for Strensall Common
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA has misunderstood the alternative green space offer. To clarify this would be 15ha of open space 'on site', with 7ha in a single block, laid out and enclosed to the east and north so as to prevent it being used as a stepping stone between ST35 and the SAC. DIO could also make available about 5.2ha north of Site ST35 and to the east and south of Site H59 which could be delivered as part of ST35 prior to occupation addressing concerns about delivery and avoiding the need to monitor impacts. Land to the south will be retained to facilitate and managed to delivers the greatest possible benefit to the health of the wet and dry heaths.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		There is no 400m policy in operation at Cannock Chase; the local planning authorities require all new housing developments within 15km of the SAC to make financial contributions to measures designed to control / manage access and maintain the SACs qualifying features. The HRA accepts proposed mitigation measures needs to be looked in combination, but to dismiss their likely combined effect in the way that Waterman does, without proper analysis, is unacceptable and a major failing of the HRA.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA finds "even if all were implemented (and it is not clear that they would) it remains doubtful that they would provide the level of certainty required to allow the Council to conclude the absence of adverse effects". However, the planning system is capable of securing delivery of mitigation (conditions, planning obligations, parameter plans etc.) and the types of mitigation DIO is proposing have been employed successfully elsewhere.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA rules out the possibility of harm being caused to the SAC by developments more than 5.5km from it. However the data indicates that between 15% and 41% of existing users travel more than 5km to visit the Common and between 10% and 23% of existing users travel more than 7.5km. The PCP estimate indicates that a minimum of 18,600 visits per annum originate from more than 5km away and a minimum of 12,400 visits from more than 7.5km away. Asserting that developments planned more than 5.5km away pose no threat to the SAC, when the HRA assumes that any increase in use poses a threat that must be mitigated, is flawed.

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345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA is overly optimistic when it examines the mitigation being offered in respect of other sites and applies less scrutiny. There is no evidence in the HRA of the promoters of other sites having given any serious thought to what impact their proposals might have on the SAC and what mitigation might be required. The HRA rules out the possibility of Sites ST17 and H46 having an adverse effect on the Common on the basis that (i) they both have access to existing green infrastructure; and (ii) account for 1.6% of the forecast increase in use of the SAC (a handful of daily visits). The HRA also dismisses the threat posed by a 1.6% increase in visits (without any mitigation) but rejects a 1.2% increase from Site H59 with mitigation measures.
345	Defence Infrastructure Organisation	Whole Plan - Habitats Regulations Assessment		The HRA notes that Sites ST8, ST9 and ST14 are forecast to cause a 7% increase in visits to the Common but asserts that the risk can be mitigated by the provision of public open space. The Burnham Beach HRA is relying entirely on AGS and not just to reduce the number of people visiting the SAC, but to prevent any of this 7% increase occurring at all. The approach inconsistent. An increase in visits to the SAC by requiring the provision of public open spaces within and adjacent to these developments cannot be ruled out – and therefore the HRA cannot pass its own test.
345	Defence Infrastructure Organisation	Section 09 Green Infrastructure	G12A Strensall Common SAC	Policy G12A could only be considered necessary if the Inspectors have already agreed on the deletion of ST35 and H59. Regulation 63 of the Habitats Regulations provides for appropriate assessment of the implications of development for European Sites etc. If site allocations ST35 and H59 are removed, the Plan will contain no site allocations or approvals for such development, and the need for compliance under the Habitats Regulations will not arise. The primary effect of PM70 would be to forestall any future planning application for development within 400m of Strensall Common.
345	Defence Infrastructure Organisation	Section 09 Green Infrastructure	G12A Strensall Common SAC	There is no evidence to support so sweeping a policy. Policy G12A derives from a recommendation made in the HRA, but the HRA does not demonstrate that any and all housing developments proposed within 400 metres of the boundary of the HRA would cause harm to the integrity of the SAC and that such harmful effects could not be prevented or mitigated

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345	Defence Infrastructure Organisation	Section 09 Green Infrastructure	GI2A Strensall Common SAC	The 400m buffer has its origins in analysis of cat predation and intense development in areas with large populations which are not a concern at Strensall
345	Defence Infrastructure Organisation	Section 09 Green Infrastructure	GI2A Strensall Common SAC	The HRA argues that a 400m rule has been introduced elsewhere to tackle urban edge effects but these can be ruled out through design and the control / management of behaviours. There is no evidence of an urban edge effect or other inappropriate behaviour being caused or more likely to be cause residents that live within 400m of a protected site.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Green Belt evidence published for consultation 18 months after the first set of Examination Hearing Sessions The Council has undertaken a fresh assessment contrary to the recommendations of Inspectors. It is impossible to work out what is new and it does not explain why the Inspectors misunderstood the Council's original methodology or demonstrate the Green Belt boundaries proposed are justified and reasonable. The new Green Belt evidence has led to different outcomes; the Council is promoting 73 changes.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York ⁹	The Green Belt assessment is still not fit for purpose. It is still missing a clear, cross comparison of the sustainability credentials of the various settlements within the administrative to show whether the spatial distribution of development proposed by the Council is the most sustainable strategy when compared against the reasonable alternatives.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Paragraph 5.10 of EX/CYC/59, the Council states that Green Belt purposes 1, 3 and 4 are "appropriate in examining the general extent of the Green Belt and justifying the proposed York Green Belt detailed boundaries" but that primary emphasis should be placed on purpose 4. In other words, the Green Belt around York only serves three purposes and the role that it plays in preserving the setting and special character of the City is its primary purpose. Respondent agrees with this assessment.

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345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	EX/CYC/59 in paragraph 5.13 suggests that the desire to maintain separation between certain settlements has played a part in how it has defined the Green Belt boundaries to date. This is inappropriate. Green Belts are strategic tools designed to play strategic roles. This is contrary to the second bullet point of NPPF paragraph 80. Preserving gaps between settlements should be the subject of bespoke provisions, such as 'Area of Separation' policies.
345	Defence Infrastructure Organisation	Section 05 Housing	H1 Housing Allocations	In Section 7 of EX/CYC/59, the Council argue that it is appropriate to assume that, from year 3 of the housing trajectory, the built-up areas will yield 169 net new dwellings per annum from windfall sites. This is equivalent to more than 20% of the area's housing need (as calculated by the Council). Respondent is concerned that the Council is over-estimating the amount of development that is likely to emerge in the form of windfalls and underestimating the amount of land it needs to identify for development
345	Defence Infrastructure Organisation	Section 05 Housing	H1 Housing Allocations	EX/CYC/59 assumes that sites proposed for allocation within the urban areas will deliver some 5,848 new homes in the period 2017 – 2038. Respondent is concerned about the Council's continued reliance on a 2017 base date and whether the Council can deliver these sites. Local authorities regularly take an overly optimistic view of housing trajectory matters leading to land supply issues in the future.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Paragraph 85 of the NPPF provides that, when defining Green Belt boundaries, local planning authorities should (where necessary) identify in their Plans areas of safeguarded land between the urban area and the Green Belt to provide for longer term development needs "stretching well beyond the plan period" and to ensure that the boundaries they define will not need to be altered at the end of the plan period. The Council has not considered this specific requirement and has wedded itself to a notion that by identifying sufficient land to satisfy its NPPF 2012 based housing requirement over the plan period plus 5 years. The Council has an important obligation to implement national planning policy and define a Green Belt that can endure and offer the permanence required by the NPPF. As things currently stand, these critical policy requirements are not being satisfactorily addressed.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Whilst the phrase “stretching well beyond the plan period” is not defined in either the NPPF or the NPPG, if the Council only plans for the boundaries to endure 5 years beyond the life of the emerging Plan, the will have to be amended when a replacement Plan is prepared. In York, where definitive boundaries are being fixed for the first time, for the Council to look a full Local Plan cycle ahead i.e. a minimum of 15 years, might be the only way to guarantee that the boundaries will not need to be altered at the end of the present Plan period.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In terms of assessing development needs (NPPF para 85), the next Plan to replace this one will have to address the housing needs prescribed by the Standard Method. The Standard Method is telling us that the Council should be delivering over 200dpa more than the emerging Local Plan provides for. Accordingly, when looking at any period beyond 2033, the Council should assume that its housing requirement is going to be higher than it is now.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 8 of EX/CYC/59 confirms that the detailed boundaries have been assessed in the light of the three Green Belt purposes. The respondent objects to the Council appearing to start from the premise that the land it is proposing to include within the Green Belt is all ‘open’. This is illustrated by the way in which it has phrased many of its questions (e.g. Does the land need to be kept permanently open in order...). But clearly some of the land that is proposed to be included within the Green Belt is not ‘open’ and we provide two good examples of this below. Therefore, the Council’s starting point is unsound
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects that the Council has ‘stretched’ Purpose 4 of NPPF paragraph 80 concerned with the preservation of the setting and special character of historic towns to include villages and other settlements, including villages and settlements that are not ‘historic. This is inappropriate, unless it can clearly be demonstrated that a village or other settlement must be ‘contained’ by Green Belt because its expansion would in some way harm the setting and special character of the City. In the overwhelming majority of cases, we find it hard to believe that the expansion of villages or other settlements would have such an effect.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Council has overcomplicated the Green Belt assessment by asking more questions than required with some not directly related to the purpose as defined in national planning policy and does the Council explain how it the answers to the questions enable it to form conclusions. For example, it is not clear whether a parcel of land that is performing a role under purpose 4 criterion 1 (compactness) but is not performing any other role, could justifiably be designated as Green Belt.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The boundary of Imphal Barracks (ST36) now being proposed is different to the one detailed in the Submission version of the Local Plan (see PM90 in EX/CYC/59h). The respondent objected to that in the submission version as it included land that was not 'open' land, performs no Green Belt function and does not need to be kept permanently open and the boundary did not follow any recognisable physical features that are likely to be permanent. Respondent objects to the new Imphal Barracks (ST36) boundary as Council has formulated under Green Belt Purpose 4 assume that the land now excluded from it is already open and could in theory be kept permanently open. But this land is occupied by sport centre (1,470 sq. m) various sports pitches and courts, storage area, telecoms mast, plant green areas with occasional trees and various other hard standing. The land that is the subject of these has a very different character and appearance to the natural, open Stray that lies to the east. The Council's starting point is wrong
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council has made 'vague, unsupported and irrelevant assertions' about the subject land (now excluded from ST36) providing physical separation between the more urban form of the Barracks and the Stray, and keeping the land open being important to the preservation of the setting and special character of the City. Respondent objects on the basis that the land does not form part of any view of the City. The built-up parts of the City extend roughly to 4,500ha and the subject land to just c.6.12ha. Development of the land would have no perceptible impact on the scale of the City. It does not and cannot play any part in a wider view that gives the impression of York as a dense compact City in an open or rural landscape.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	Reference to the subject land being part of a Green Wedge linked to its original Green Belt Appraisal (2003) (SD107A) is irrelevant and was in any case without evidence and justification. The land is not designated as such and identification of the subject land as part of a Green Wedge in the Green Belt Appraisal (2003) (SD107A) was erroneous as it did not the stipulated criteria in the appraisal for this on basis that it is not undeveloped, it does not have a rural feel, it does not have an open aspect, it does not form part of any views to City landmarks, and it does not play a role in separating different parts of the City or areas with different characters. There are no sound planning reasons for designating or treating the land area now excluded from ST38 as some form of extension to the Stray.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council notes in its Green Belt evidence landmarks is not a relevant consideration to determining the greenbelt boundary of Site ST36 . Respondent agrees.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council notes in its Green Belt evidence the' tranquillity, remoteness or wildness of the asset' is not a relevant consideration to determining the greenbelt boundary of Site ST36. Respondent agrees.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council fails in EX/CYC/59e to say how keeping the subject land free of development is necessary in order to help people understand the historical relationship between the City and its hinterland. It repeatedly, and erroneously, links the subject land with the Stray and conflates with the subject land the very different roles and characteristics exhibited by the Stray.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent has no doubt that Walmgate Stray plays a part in the setting and special character of the City, but it has a very different history, character and appearance to the land now excluded from ST36. The two are quite clearly distinct on the ground and a separated from one another by strong physical features. The subject land plays no role at all in the wider open countryside surrounding the City or in any of the approaches to it. It could be developed and this would have no impact whatsoever on people's ability to understand the relationship between the City and its historical Green Wedges which, in this particular part of the City, comprises Walmgate Stray.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council notes that need to remain permanently open to aid the understanding or significance for the situation of a designated landscape, park or garden is not a relevant to the boundary of ST36 and the respondent agrees.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent fundamentally disagrees with the proposition that the development of the subject land would constitute urban sprawl. The land has been used exclusively for military purposes since the late 1800s and contains buildings and other structures with urban characteristics. The land has a clear physical and functional relationship with the rest of the Barracks site (and no such relationship with Walmgate Stray to the east).
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council breaks the question of sprawl down into several parts, but the NPPF does not. What the NPPF says is that for land to serve Purpose 1 it must check the unrestricted sprawl of large built- up areas. The development of the subject land would not be unrestricted. As indicated above, the northern, eastern and southern boundaries of the Barracks are very clearly defined by strong physical features which restrict the development of the land and prevent development from spilling over into the Stray. There is also built development to the immediate south of the subject land preventing any further extension of the Barracks site in that direction. The subject land does not have an open boundary to the Stray. The boundary is recognisable, strong longstanding; it more than adequate to serve as a barrier limiting the eastward expansion of the Barracks site.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The reference to open fields and suggestion that the outdoor sports provision provides “separation between the more urban form of the barracks and open land of the Stray” is incorrect. The site contains buildings, structures, hard standings, plant, equipment, tall floodlighting columns and other urbanising and has development on two sides which greatly influence its character and how it feels when one is actually on the land.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The subject land now excluded from ST36 does not function as part of the countryside nor does it lie adjacent to land that has the character of open countryside. In addition, it does not have an open character that could in any way be said to contribute to the character of the countryside surrounding the City providing neither views nor access.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The NPPF provides that, when defining Green Belt boundaries, local authorities should do so clearly, using physical features that are readily recognisable and likely to be permanent. The boundary proposed by the Council only in small part follows physical features that are readily recognisable and likely to be permanent. To the immediate north west of the sports centre, the boundary appears to follow an internal Barracks security fence (2.5m high) which will serve no purpose when the Army vacates the site and so will be removed. At that point, there will be no recognisable, physical features along this part of the boundary, separating the housing allocation to the west from the Green Belt to the east, There is only one logical line for the Green Belt boundary to take (shown on Fig. 5.3 of the submission) which is the very clearly marked limits of Impfal Barracks. It is made up of clearly recognisable physical features and has already endured since the Secretary of State for Defence established the Barracks here in the late 1800s, confirming its permanence.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council's assessment of whether development of the subject land now excluded from ST36 would be consistent with the Local Plan strategy is illogical and inadequate. It forms part of a developed site, the rest of which is proposed to be allocated for housing development in the Local Plan and is therefore, in a highly sustainable location. Development would be consistent with the Local Plan strategy.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Green Belt boundary in the vicinity of Queen Elizabeth Barracks at Strensall is different to the one detailed in the Submission version of the Local Plan and is also different to the boundary proposed by way of PM39 published in 2019 (see PM101 in EX/CYC/59h). Whilst DIO welcomes the Council's acknowledgement that PM39 was unsound, the amended boundary is still not NPPF compliant.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	Green Belt boundary in the vicinity of Queen Elizabeth Barracks at Strensall washes over with Green Belt: a children's outdoor play area; the Submission Version Site H59 and the former playing pitch to the immediate east of it; the 1 to 3 storey Reserved Forces and Cadet Association Training Facility east of QEB off Scott Moncrieff Road and outdoor assault course and storage/ plant facilities to the south; an open storage facility with hardstanding and containers, undeveloped parts of QEB, including its main sports pitches which lies between Cheshire Avenue, Strensall Road and the houses fronting onto Alexandra Road; and approximately 90 dwellings and the hard sports courts that lie to the immediate south of QEB off Alexandra

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				Avenue and Strensall Park Road. There are no sound Green Belt policy reasons for including this land within the Green Belt and it should be excluded (as shown in Figure 5.9 in submission).
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The fourth purpose of Green Belts is defined in national planning policy as “to preserve the setting and special character of historic towns and the RSS refers only to York in the context of purpose 4. The Council applies purpose 4 to villages and other settlements, including those that are not ‘historic’. This is flawed as Strensall is not a historic town that has a setting and / or a special character that has been defined in evidence and which can only be preserved by preventing the village from expanding. It is not a settlement to which purpose 4 applies in the way that the Council has applied it in this part of EX/CYC/59f.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Evidence related to the setting and special character of York and the role of hinterland settlements, is contained in two short paragraphs on page 62 of the Councils Heritage Topic Paper Update (2014). This is not a detailed analysis and does not reference examine the specific role that Strensall plays. It cannot be right, given the size of Strensall (relative to the City) and the distance between the City and the village, that expansion of Strensall would harm the setting or special character of York. There is no evidence which indicates that that would be the result.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Submission version Local Plan proposed the development of land at QEB; it is perverse to now suggest that any expansion of Strensall would adversely impact the setting and special character of York. The Council is not promoting the deletion of the QEB allocations for reasons relating the impact that the development of this land would have had on the setting and special character of York. The Council’s approach to the application of purpose 4 around Strensall is unsound.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent disagrees that land that the Council proposes to wash over with Green Belt would or could comprise sprawl. The land within QEB that lies to the immediate east and south of the proposed Green Belt boundary contains buildings and structures with the urbanising influences that form an integral part of QEB and are clearly distinct from the genuinely open land of Strensall Common to the east.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent disagrees that land that the Council proposes to wash over with Green Belt would or could comprise sprawl. Respondent proposes to reinforce the northern and eastern boundaries of the QEB land parcel. With or without such reinforcement, there is no prospect of development of this parcel being 'unrestricted' and giving rise to the potential for further outward expansion to the north or east on account of the adjacency of the SSSI / SAC.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent disagrees that land that the Council proposes to wash over with Green Belt would or could comprise sprawl. The land occupied by the RFCFA training facility and associated facilities are contained by existing development within QEB to the north and south and the SSSI / SAC to the immediate east and the QEB to the south. The playing pitches to the west of the Officers Mess are contained on all sides by built development and / or roads. Development of this land would also, therefore, not be unrestricted.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council identifies that the land that it proposes to wash over with Green Belt immediately adjacent to Boundary 5, does not comprise open countryside. Designating the land as Green Belt would not, therefore, serve Purpose 3 as defined in NPPF 85.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Green Belt Boundary 5 does not follow existing physical features that the Council can guarantee are permanent, consisting as they do of roads, footpaths and internal fences that are part of the on-base infrastructure that will not be needed past 2024. Conversely, the boundary proposed by the respondent would in all respects follow physical features that are clearly recognisable and are likely to be permanent. All of the boundaries are marked by fences and in large part these fence lines are reinforced by hedges and trees.
345	Defence Infrastructure Organisation	Section 05 Housing		By allocating the QEB sites for development in the Submission version of the Local Plan, the Council accepted that the development of this land would be consistent with the Local Plan strategy. The land is, therefore, in a sustainable location and the development of it would be entirely consistent with the Local Plan strategy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council is proposing that parts of QEB are washed over with Green Belt. The land contains buildings, roads, hard standings, open storage on a significant scale, an assault course, fined plant, security fencing, formal landscaped areas, informal open spaces, and playing pitches. Therefore, the majority of the land is not 'open' and those parts of it that are open (i.e. the grass pitches and informal open spaces adjacent to the Officer's Mess) are surrounded by buildings and / or adjacent to urban and urbanising features.
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	Policies Map (Green Belt)	The plan can be made sound by the amendments to the Green Belt around Strensall in the vicinity of Queen Elizabeth Barracks.
345	Defence Infrastructure Organisation	Section 05 Housing	H1 Housing Allocations	DIO object to footnote to Policy H1: Housing Allocations as it relates to Strensall SAC
345	Defence Infrastructure Organisation	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	Policy SS19 should be amended to require planning applications to be accompanied by Habitat Regulations Assessment which considers the potential harm to the integrity of Strensall Common SAC, determines whether mitigation measures need to be implemented and requires such measures are implemented prior to occupation. The buffer and boundary treatments from Scott Montcrieff Road to Ox Carr Lane should be referenced.
350	Picton	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails on the tests relating to effectiveness, consistency with national policy, justification and being positively prepared.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
350	Picton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider Policy SS1 to be sound as it is not positively prepared, effective or consistent with national policy.
350	Picton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to the OAHN of 790 homes per annum set out in PM54 and the housing requirements set at 882. Respondent considers, based on the CJ Housing Needs and Supply Report (PM2019), that the OAN should be at a baseline minimum of 1,066 dpa.
350	Picton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes there should be caution when taking applying the housing need principles relating to standard method. Document CYC/43a report used to support the council's continued use of the 790 dpa over the plan period raises concern over the use of the 2018-based household projections
350	Picton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document CYC/43a continues to use an economic growth of 650 jobs. Whilst document CYC/29 was used to validate this, the figure originally derived from a baseline forecast produced in 2015. This is now becoming significantly out of date.
350	Picton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document CYC/36 continues to show that affordable housing need will not be met. This demonstrates a serious flaw within the council's approach to housing need and affordability. On behalf of the council, this shows a lack of understanding to acknowledge the seriousness of the issue and to look for appropriate solutions.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
350	Picton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document CYC/32 also raises concerns over the validity of the data as part of the evidence base used to inform modifications to the local plan.
350	Picton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM49-54 are based upon an unrealistically low OAHN. This could be resolved through proposed housing requirement based on a minimum OAN of 1,069 dpa. Council should consider additional sites to allow flexibility.
350	Picton	Section 05 Housing	H1 Housing Allocations	Respondent, on behalf of their client, would like to see the site at Kettlestring lane, Clifton Moor as an appropriate site for housing and should be allocated within the plan period.
351	McArthurGlen - AVIVA INVESTORS - YDO	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers the document to be sound. Supporting the removal of the York Designer Outlet (YDO) site from the Green Belt (paragraph 6.29 p51), its expansion on site, and the relocation of the YDO Park and Ride to land to the south.
351	McArthurGlen - AVIVA INVESTORS - YDO	Section 03 Spatial Strategy	Policies Map (Green Belt)	Supporting the conclusion on page A4:319 in respect of the YDO that the site does not contribute to the openness of the Green Belt and offers an opportunity for focusing development towards an urban area within the Green Belt in line with NPPF

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
351	McArthurGlen - AVIVA INVESTORS - YDO	Section 03 Spatial Strategy	Policies Map (Green Belt)	The opportunity for growth within the YDO should be reflected more clearly in the document. Document states that there is “limited potential for development to the south of the Designer Outlet” (page A4:326), however there should be greater recognition of the role that the site could play in accommodating development not considered inappropriate in principle within the Green Belt, and which is consistent with local plan and Framework policy, e.g. local transport infrastructure in the form of the relocated YDO P&R
351	McArthurGlen - AVIVA INVESTORS - YDO	Section 03 Spatial Strategy	Policies Map (Green Belt)	Any relocation of the P&R should logically be as close to the existing provision at the YDO to retain existing functionality and synergies – there is no policy requirement for it to be located away from the YDO
351	McArthurGlen - AVIVA INVESTORS - YDO	Section 03 Spatial Strategy	Policies Map (Green Belt)	Conclusion on page A4:330 appears to be inconsistent with the previous comments on the prospect for growth at the YDO and suggest the section is reworded as follows: “Determining a clear, defensible boundary - The Green Belt boundary around the YDO has been defined to be clear and defensible. The removal of the YDO from the Green Belt allows for growth within this dense urban area in a sustainable manner consistent with the local plan spatial strategy. In order to deliver long term permanence for the York Green Belt it has been determined that there is not potential for the Green Belt boundary to be extended to the south beyond boundary 2, however there is potential here for the relocated YDO Park and Ride facility consistent with local plan policy. This results in the final Green Belt boundary for the village as follows:”
358	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. (site 795) Respondent believes the analysis is flawed in relation to a site on Murton Lane, Murton.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
358	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(site 795) Regarding the purpose of compactness (criterion 1), if developed the industrial estate would still be compact and contained within the outer ring road. This would therefore abide by the criteria that the site (795) must maintain the scale and identity of Murton Industrial Estate to prevent the coalescence with Murton Village or Dunnington.
358	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(site 795) Regarding the purpose of landscaping and setting (criterion 3), the development of this site would not materially or adversely impact on the rural setting for the 'open approaches' of the outer ring road, A64 and the A166. it would not harm the setting of Murton as a freestanding village or result in harmful coalescence with Dunnington.
358	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(site 795) Regarding the purpose of checking urban sprawl (criterion 4) a development would not result in unrestricted sprawl. A carefully designed development, would enhance the setting of Murton Industrial estate by removing the current abrupt edge between buildings and the countryside.
358	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(SITE 795) Regarding the purpose of safeguarding the countryside from encroachment, there would be no adverse impact on openness and views from the A166.
358	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The current southern boundary of the industrial estate on the east side of Murton lane is a recent late twentieth century construct. A strengthened boundary based on the established mature tree line along the south-eastern boundary of site 795 would provide permanent and more aesthetically appealing boundary. Greater logic in extending the boundary in this manner.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
358	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The southern boundary of the Murton Industrial Estate (boundary 3) is amended to include site 795.
359	NHS Property Services Ltd	Whole Plan	-	Respondent does not consider the document to be sound as it has not been positively prepared nor is it consistent with national planning policy.
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The document has not been positively prepared as the proposed GB boundary at Clifton park Hospital (PM78) is wrapped tightly around the existing built up area, and therefore intentionally seeks to restrict opportunities for appropriate development in a sustainable location of land which is no longer in line with the characteristics for the GB.
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The document is not consistent with national planning policy. Criteria within the NPPF regarding GB boundaries is clear that land which is unnecessary to be kept permanently open should not be included within the GB.
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The proposed boundary PM78 should be amended to follow the clear physical barriers of the site and to include land that no longer serves the purpose of the GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	PM78 takes land at the former hospital site out of the designated GB which the respondent supports strongly given this will assist in ensuring that future development will be located in the most sustainable locations in and around York.
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Proposed northern boundary follows the line of Flyingdale Avenue then moves northwards to encompass the Clifton park Hospital building, Blue Beck House and Clifton House, leaving an area of land adjacent to Shipton road within the designated GB. respondent does not approve of this.
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Suggest a more logical northern boundary that follows the building line of the existing buildings and include the area of land between Clifton park hospital and Shipton road within the boundary. it is unnecessary to keep this area of land open as it is bound on three sides - does not retain a strong sense of openness. Boundary should follow the building line of the existing built-up area across to Shipton Road in order to provide a coherent and logical GB boundary.
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	PM78 is an area, one of the few, that does not follow a strong physical features as part of the GB. It is wrapped tightly and somewhat haphazardly around the existing built-up area.
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst the respondent supports the principle of the PM, it is not sound in terms of being positively prepared nor consistent with national planning policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
359	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The proposed boundary around Clifton Park Hospital is amended to follow the clear physical barriers of the site and to include land that no longer serves the purposes of the GB.
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the document legally compliant and strongly endorses the approach taken to defining the inner boundary of the Green Belt – Believes that the boundaries selected help to fulfil the purposes of establishing the Green Belt
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 7, Boundary 15 and 19 – Protect the rural link from Walmgate Stray to the open countryside, maintaining the historic 'Green Wedge' – protects the views of the people who walk or cycle the busy route across the Stray at its northern end – semi natural open space is managed for biodiversity and is easily accessible from the urban area to the west, north and south.
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 7, Boundary 16 – designed to protect the setting of the Retreat, surrounded by countryside or parkland on three sides and maintains the green wedge connection to the Herdsman's Cottage
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 7, Boundary 17 – inclusion of the allotments site maintains the green link between York Cemetery and the Stray and open countryside beyond – the railings and high walls of the cemetery on the west and north make a well-established boundary to the Green Belt

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 7, Boundary 18 – Approves decision to keep the sports fields within Green Belt since it enhances its openness and visual connection across the Low Moor
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 8, Boundary 7 – Historical precedent as the edge of urban development – currently used as recreational/dog walking open space (existing radio masts are due to be removed within the plan period which enhances its recreational and potential Green Belt value) – residents of the retirement static mobile homes value the land as being within rural Green Belt setting – boundary north of the field marks the edge of residential development on the former school site, with a communal heritage orchard maintained by residents to the west of the boundary
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 8 – represents the margin between urban development with an open playing field to the west
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 9 – an important contribution to the Green Wedge C4 and provides a rural aspect – offers a distinct transition from urban to rural open space with views towards the south and west
361	Cllr Andy D'Agorne	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 10 – clearly defined by the boundary wall to Hospital Fields Industrial Estate, with land to the west being in recreational use and liable to flooding – important in providing an open rural setting for the Millennium Bridge, provides a valuable East to West walking and cycling route to the University via Walmgate Stray as well as recreational use

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider document to comply with Duty to cooperate. Not convinced Council had adequately discussed the long term implications of tight green belt, lack of safeguarded land, and short remaining life of the proposed local plan with only 5 year future housing land supply at the Plan's end in 2033 in terms of future housing demands and transport impacts that will then potentially be required of those councils and poor sustainability of such a solution.
364	York Labour Party	Whole Plan	-	Does not consider the document sound, fails to be positively prepared, justified, effective, and consistent with national policy. Specifically PM47-50, PM52-57 (including Key diagram), PM62-PM63b.
364	York Labour Party	Whole Plan	-	Further modifications again failed to properly cater for the needs of the York population, both present and future.
364	York Labour Party	Whole Plan	-	Some of the documents justifying these latest modifications were produced due to the advent of COVID19 pandemic, which changed work/retail patterns short and long term. Consequences of the pandemic on jobs/income particularly those in insecure ones - leisure/visitor/retail/hospitality sectors are likely to last a long time, perhaps permanently. Further exacerbating income inequalities and circumstance which ratchet's York's existing housing/housing affordability crisis up several notches. None of this is recognized in these documents although much of it was already clear in terms of significance before publication of these latest modifications.
364	York Labour Party	Whole Plan	-	Respondent repeats general assertions they made in their original submission and response to the 2019 modifications (representations here should be read in conjunction with those), and comment on how far the Council has responded to points in regard to these latest modifications.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Policy SS1 states that it will deliver Sustainable Growth for York and is the most important single strategy in the Local Plan because it ties together the City vision, the economy, housing and transport. Respondent are extremely concerned that the plan fails to address the major challenges facing the city over the plan period, not least how to become more sustainable and reduce the city's carbon footprint, and how to address rather than exacerbate the social inequalities, related housing / affordable housing crisis, population displacement and impact on the ability of key sectors of the local economy like hospitality and care to recruit staff.
364	York Labour Party	Whole Plan	-	Plan fails to deliver on overriding objective of prosperity for all.
364	York Labour Party	Whole Plan	-	Plan lacks any analysis of how different groups in the community are affected by the proposals. It fails to heal the highly unequal conditions of, or deliver opportunities for, all the residents of York.
364	York Labour Party	Whole Plan	-	Plan fails to follow up on the implications of sustainability.
364	York Labour Party	Whole Plan	-	Plan chooses employment and housing options without referencing how they impact on community or environmental sustainability.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There is no credible and comprehensive transport strategy to address existing transport and access problems, leaving aside those arising from the proposed new developments.
364	York Labour Party	Whole Plan	-	Council's latest modifications fail to address any of respondents previous points regarding 'The Economy'.
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes there is on-going imbalance in nature of new housing being built in the city, with too large a proportion built in the form of expensive medium rise apartments for the student (off campus student accommodation totalling 887 units represented a quarter of all completions from and including 2016 through to mid 2020), and also for London & South East downsizing, buy to let Airbnb and holiday lets markets, and too little being built for the local York residential market, particularly families. In turn reflects the concentration of the market on expensive to develop brownfield sites in the main urban area, and insufficient more suburban sites, which is why we strongly object to the reinforcement of that bias in the reworded plan policy (ref. PM 52).
364	York Labour Party	Section 05 Housing	H1 Housing Allocations	Respondent believes there is on-going imbalance in nature of new housing being built in the city, with too large a proportion built in the form of expensive medium rise apartments for the student (off campus student accommodation totalling 887 units represented a quarter of all completions from and including 2016 through to mid 2020), and also for London & South East downsizing, buy to let Airbnb and holiday lets markets, and too little being built for the local York residential market, particularly families. In turn reflects the concentration of the market on expensive to develop brownfield sites in the main urban area, and insufficient more suburban sites, which is why we strongly object to the reinforcement of that bias in the reworded plan policy (ref. PM 52) and in the related allocations and delivery profiles (PM62-63b).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Important that Policies are amended to ensure the first priority is on providing the right mix of brownfield and previously undeveloped land over the plan period that's required to deliver the balance of housing types and prices to address all parts of York's housing needs as evidenced in the SHMA and in our own and others submissions.
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Elected representatives are aware of the consequences in terms of insecure accommodation situations, sofa surfing, etc. Despite this, the Council is proposing modifications to the Publication draft to both further reduce overall future housing provision further (PM50), and to only deliver 38.6% of the Hearn affordable need estimate (which we have previously challenged as being an underestimate). This is unsound public policy.
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Council's latest modifications again fail to address any of respondents previous points, and fails to adhere to the Government's March 2015 guidance on the Transport evidence base for local Plans.
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Failure of the current plan to think beyond the end of the current plan period reflected in the fact that the lack of safeguarded land for future development will either precipitate an immediate review of the so called permanent green belt in around barely over a decade from now in 2033 when there will only be a 5 year housing supply left (PM49).
364	York Labour party	Whole Plan	-	Respondent does not think the document is up to date in terms of the implications of COVID on jobs, incomes, and housing affordability.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not think document adequately covers the need for social renting as against other forms as so called affordable housing or the lack of affordability for substantial proportion of local resident of other forms of 'affordable' housing.
364	York Labour party	Whole Plan	-	Documents justifying these latest modifications were produced due to the advent of COVID19 pandemic, which changed work/retail patterns short and long term. Consequences of the pandemic on jobs/income particularly those in insecure ones -leisure/visitor/retail/hospitality sectors are likely to last a long time, perhaps permanently. Further exacerbating income inequalities and circumstance which ratchet's York's existing housing/housing affordability crisis up several notches. None of this is recognized in these documents although much of it was already clear in terms of significance before publication of these latest modifications.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent concerned that plan fails to address the major challenges facing the city over the plan period, one being housing/ affordable housing crisis.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The City faces some of the highest increases in house prices and rents in the country. Local paper reported that house prices in York had increased by 11.4% in the last year from April 2020 (See: First time buyers pay £24,000 more for a York home than a year ago York Press), and a linked front page article referred to house prices rising by an average £29k to £286,987 in April 2021 based on land registry figures, which local Hudson Moody Estate Agents linked to people moving to York from London and the South East as a result of being able to work from home. The slightly older ONS figures for September 2020 also show the extremely serious problem in the lower part of the market with the Local Affordability ratio (lower quartile) climbing to 9.09 against an England Wales figure of 7.01 and a Yorkshire and Humber regional figure of 5.65, and the median York figure of 8.04.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Paper on affordable housing broadly confirms our previous representations that the loss of Council housing through right to buy sales wipes out a very high proportion of the new “affordable” housing overall, and means a significant accumulating net loss of “affordable” properties to rent, given the very low proportion of so called “affordable” housing that is provided for social rent, which is the only affordable option for many low paid workers.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent reiterates the warnings and legitimate concerns of many groups and individuals in the City on this, and note that they were echoed by the Council’s own Head of Housing in a paper to the January 2020 Scrutiny committee (before the pandemic) that said, whilst “Many households in York are housed securely in homes they own and have benefitted from lower prices in earlier decades and/or low current interest rates reducing mortgage costs. By contrast a significant minority of households face a worsening of affordability as costs of home ownership and private rents both rise faster than local incomes”. Respondent add that their elected representatives are aware of the consequences in terms of insecure accommodation situations, sofa surfing, etc. Despite this, the Council is proposing in the modifications to the Publication draft to both further reduce overall future housing provision further (PM50), and to only deliver 38.6% of the Hearn affordable need estimate (which we have previously challenged as being an underestimate). This is totally unsound public policy.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent understands the legal position that Local Plan’s do not need to demonstrate that the whole affordable housing need has to be met, they consider that both proposed overall provision should be higher and a much larger volume needs to be in the form of housing for social rent given the evidence. With the previously referenced Head of Housing reporting a then 1030 people being in either the Emergency, Gold or Silver Bands on its waiting list , it is essential a much larger element of social housing provision is delivered by the plan for it any way to be effective or sound.
364	York Labour party	Whole Plan	-	Respondent does not consider document to be sound. Does not think the document is up to date in terms of the implications of COVID on Jobs, incomes, and housing affordability, the impact of the volume of off campus purpose built student accommodation, inward immigration from downsizers from London and the South East, the increase in Airbnb and holiday lets, etc. on both housing supply and house prices and rent levels in York.

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364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	City continues to face some of the highest increases in house prices/rents in the country. Local paper reported that house prices in York increased by 11.4% in the last year from April 2020 (See: First time buyers pay £24,000 more for a York home than a year ago York Press), and a linked front page article referred to house prices rising by an average £29k to £286,987 in April 2021 based on land registry figures, which the local Hudson Moody Estate Agents linked to people moving to York from London and the South East as a result of being able to work from home. The slightly older ONS figures for September 2020 also show the serious problem in the lower part of the market with the Local Affordability ratio (lower quartile) climbing to 9.09 against an England Wales figure of 7.01 and a Yorkshire and Humber regional figure of 5.65, and the median York figure of 8.04.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes this in part reflects the on-going imbalance in the nature of new housing being built in the city, with too large a proportion being built as expensive medium rise apartments for the student (off campus student accommodation totalling 887 units represented a quarter of all completions from and including 2016 through to mid 2020), and also for the London & South East downsizing, buy to let Airbnb and holiday lets markets, and too little being built for the local York residential market, particularly for families. Reflects the concentration of the market on expensive to develop brownfield sites in the main urban area, and insufficient more suburban sites, which is why respondent strongly objects to the reinforcement of that bias in the reworded plan policy (PM 52), and in the related allocations and delivery profiles (PM62-63b). This is continued in the proposed local plan with its particular reliance on the now permissioned, large and high density York Central site, close to York railway station with its excellent connections to London. The new housing will be vulnerable to accommodating downsizers from London and buy to let, rather than local residents, who probably wouldn't be able to afford the properties anyway. Hence it is vital that the Local Policies are amended to ensure the first priority is on providing the right mix of brownfield and previously undeveloped land over the plan period that's required to deliver the balance of housing types and prices to address all parts of York's housing needs as evidenced in the SHMA and in our own and others submissions.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	New paper on affordable housing broadly confirms respondents previous representations that the loss of Council housing through right to buy sales wipes out a very high proportion of the new “affordable” housing overall, and certainly means a significant accumulating net loss of “affordable” properties to rent, given the low proportion “affordable” housing that is provided for social rent, which is only affordable option for many low paid workers. Reiterate the warnings and concerns of many groups and individuals in the City on this, and note that they were echoed by the Council’s own Head of Housing in a paper to the January 2020 Scrutiny committee (before the pandemic) that said, whilst “Many households in York are housed securely in homes they own and have benefitted from lower prices in earlier decades and/or low current interest rates reducing mortgage costs. By contrast a significant minority of households face a worsening of affordability as costs of home ownership and private rents both rise faster than local incomes”. Respondent would add that their elected representatives are aware of the consequences in terms of insecure accommodation situations, sofa surfing, etc. Despite this, the Council is proposing in the modifications to the Publication draft to further reduce overall future housing provision further (PM50), and only deliver 38.6% of the Hearn affordable need estimate (which we have previously challenged as being an underestimate). This is totally unsound public policy.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan states that it will achieve sustainable development, but it doesn’t. The only way to achieve genuine sustainability is to cluster new developments. Clusters can work (1) around existing facilities that can take expansion to serve the additional population or (2) when new developments are built on a scale that means new facilities and effective sustainable transport linkages can be provided.
364	York Labour party	Section 05 Housing	Site Allocation ST15	Proposed plan fails in both ways because it supports over development in the urban core where balanced and sustainable provision is not possible, failing to provide appropriate open space, leisure and sports facility requirements for new developments, often in parts of the city where existing provision is already seriously inadequate. Developments proposed on the periphery are generally too small and will not sustain an appropriate range of new facilities (e.g. ST14 and ST15), and/or overload existing ones. This is true about community facilities, including green space, and transport equally. A recent workshop on sustainable communities run by York Civic Trust highlighted the need for adequate size of communities to ensure the provision of a local primary school, shops and other services, local employment sites, plus both a reasonable seven

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				day a week bus service including evening services to the city and major service locations, and dedicated cycle (and walking) routes providing off road links.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	York Civic trusts workshop findings strongly argues for a different pattern of future development from that proposed in the draft local plan. The plan should focus on providing a couple of much larger new developments that have the range of land use allocations to provide genuinely sustainable new communities - the Town and Country Planning Association's "Creating Garden Cities and Suburbs Today - a guide for councils" highlights the considerations and approaches on which these could be provided.
364	York Labour party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Help to address the failure of the current plan to think beyond end of current plan period reflected in the fact that the lack of safeguarded land for future development will either precipitate an immediate review of the so called permanent green belt in around barely over a decade from now in 2033 when there will only be a 5 year housing supply left (PM49) or require York's future housing and employment needs to be met by surrounding Council areas. Consequences of the latter approach can be seen by looking at a good parallel in Oxford's latest Local plan – very tight Green Belt and limited remaining developable land with the city has led to a failure to meet all of its calculated 24k housing needs despite extreme housing pressures and prices in the Country – and despite the surrounding Council areas collectively matching the total of new housing provision in Oxford itself in their own areas (10k housing units each). Because the new external housing allocations are quite some distance from the city and beyond even reasonable cycling distance, there will consequential be a massive and totally unsustainable increase in commuting that will potentially cause major difficulties for the already overloaded outer ring road / local trunk road network as evidenced in Oxfordshire's Local Transport Plan(see: https://www.oxford.gov.uk/downloads/download/1176/oxford_local_plan_2016-2036 and Background CA_JUN2816R07 Connecting Oxfordshire vol 1 - Policy and Overall Strategy.pdf). Respondent do not consider this is the way for York to go, and a change in approach to genuinely planning for sustainability, including adequately catering for York's longer-term future and a much more permanent green belt is required. In this regard the plan is unsound, failing all four soundness tests.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider document sound. Neither has the widespread recognition of the Climate Crisis, which led to the City of York Council declaring a Climate Emergency in March 2019 (see minute 68 – motion iv here: https://democracy.york.gov.uk/mgAi.aspx?ID=50283), committing Council “to a target of making York carbon neutral by 2030, taking into account both production and consumption emissions (scope 1, 2 and 3 of the Greenhouse Gas Protocol).” been taken into account. Similarly the legally binding October 2019 Government order amending the Climate Change Act to set a net zero target for 2050 nationally (see: https://www.legislation.gov.uk/ukdsi/2019/9780111187654), the implications of various court cases relating to how the target should be taken into account, or the sixth carbon budget laid in Parliament on April 21st appear to have been considered in these modifications or in the Sustainability Appraisal.
364	York Labour Party	Whole Plan	-	Respondent does not consider document sound. Respondent repeat the general assertions they made in original submission and response to the 2019 modifications (representations here should be read in conjunction with those), and comment on how far the Council has responded to our points in regard to these latest modifications.
364	York Labour Party	Whole Plan	-	Documents justifying these latest modifications were produced due to the advent of COVID19 pandemic, which changed work/retail patterns short and long term. Consequences of the pandemic on jobs/income particularly those in insecure ones -leisure/visitor/retail/hospitality sectors are likely to last a long time, perhaps permanently. Further exacerbating income inequalities and circumstance which ratchet's York's existing housing/housing affordability crisis up several notches. None of this is recognized in these documents although much of it was already clear in terms of significance before publication of these latest modifications.
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is not convinced the implications of this approach to the green belt have been properly explored (related comments on composite modifications schedule.

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364	York Labour Party	Whole Plan	-	Respondent does not consider document to be sound, plan fails to follow up on the implications of sustainability.
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Plan states it will achieve sustainable development, but it doesn't. The only way to achieve genuine sustainability is to cluster new developments. Clusters can work (1) around existing facilities that can take expansion to serve the additional population or (2) when new developments are built on a scale that means new facilities and effective sustainable transport linkages can be provided.
364	York Labour Party	Section 05 Housing	Site Allocation ST15	The reduction in site allocations ST15 should be re-looked at in conjunction with the nearby previous draft plan "Whinthorpe" site towards this end and a larger site excluded from the Green Belt, including appropriate safeguarded land allocations for the longer term, capable of delivering a genuinely sustainable new community in this location.
364	York Labour Party	Section 05 Housing	Site Allocation ST14	Reduction in ST14 and the tight green belt boundary round it should also be reconsidered for similar reasons.
364	York Labour Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Adjustment of ST14/15 would help to address the failure of current plan to think beyond the end of the current plan period reflected in the fact that the lack of safeguarded land for future development will either precipitate an immediate review of the permanent green belt in around barely over a decade from now in 2033 when there will only be a 5 year housing supply left (PM49) or require York's future housing and employment needs to be met by surrounding Council areas. Consequences of the latter approach can be seen in Oxford's latest Local plan – the very tight Green Belt and limited remaining developable land with the city has led to failure to meet all of its calculated 24k housing needs despite the most extreme housing pressures and

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				prices in the Country – and despite the surrounding Council areas collectively matching the total of new housing provision in Oxford itself in their own areas (10k housing units each). Because new external housing allocations are quite some distance from the city and beyond even reasonable cycling distance, there will consequential be a massive and totally unsustainable increase in commuting that will potentially cause major difficulties for the already overloaded outer ring road / local trunk road network as evidenced in Oxfordshire's Local Transport Plan(see: https://www.oxford.gov.uk/downloads/download/1176/oxford_local_plan_2016-2036 and Background CA_JUN2816R07 Connecting Oxfordshire vol 1 - Policy and Overall Strategy.pdf). Respondent does not consider this is the way for York to go, and a change in approach to genuinely planning for sustainability, including adequately catering for York's longer-term future and a much more permanent green belt is required. In this regard the plan is unsound, failing all four soundness tests.
364	York labour party	Whole Plan	-	Respondent does not consider document to be sound. No further justification given.
366	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	JLL responding on behalf of NHS Property Services and in relation to Limetrees site, Shipton Road. Respondent does not consider the evidence relating to the Inner Green Belt to be sound on the basis that it is not positively prepared, not justified, not effective and not consistent with national policy. The site is well established and has existed in its current state for many years with strong boundaries, therefore the site is a strong candidate for removal from the Green Belt in the Council's ongoing review of the York Green Belt inner boundary review.
366	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The removal of the Limetrees site from the Green Belt is not considered to present a risk to any of the five purposes of the Green Belt and not lead to unfettered development on the site as it remains constrained by several factors, including: proximity to conservation area, TPOs, impact on the openness of the retained Green Belt, neighbouring amenity, and general physical constraints of the site. CYC have chosen to remove 27 Shipton Road on the basis that it 'represents a newer addition to the landscape has been excluded from the Green Belt as it follows the existing building line of the residential properties to the south of it and has a clearly defined curtilage'. This same point can be made for the Sports Club and Lime Trees buildings.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
366	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The assessment of Boundary 1a does not sufficiently acknowledge that it is also formed by NHS Property Service's Lime Trees site and Clifton Park itself. It is entirely possible to distinguish the Lime Trees and/or Sports Club buildings from the surrounding areas of open space, sports pitches, and river flood plain – particularly true of the Lime Trees site, which benefits from a clear and strong boundary of mature trees and vegetation.
366	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Allowing properties to the south of the Sports Club to be removed from the Green Belt but not the remaining built areas north of this is inconsistent and arbitrary. Retaining these properties within the Green Belt would make no difference to urban sprawl as the sites are already developed and so the 'sprawl' has already occurred. CYC propose removing the built footprint of Clifton Hospital from the Green Belt which is considerably larger and developed to a far greater denser degree than Lime Trees and York Sports Club. The removal of this site would have a far greater potential impact on the surrounding area than the removal of the Lime Trees site by virtue of greater scale and fewer constraints.
366	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent agrees that restricting sprawl, protecting open space, and protecting the special historic setting of York is fundamental to the purposes of the Green Belt, however they strongly disagree that this cannot be achieved were Lime Trees and/or the Sports Club building to be removed from the Green Belt.
366	NHS Property Services Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	NHS Property Services proposed the removal of Lime Trees from the Green Belt
372	Gladman Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider local plan sound, is not justified. Respondent reiterates comments in Matter 3 hearing statement in relation to number of documents which make up evidence base, it is highlighted: 2003 Appraisal fails to provide a complete assessment of the York Green Belt against all Green Belt purposes, focussing only on purposes 2 and 4.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
372	Gladman Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers local plan sound in relation to Annex 4, and the appropriate conclusions drawn in relation to proposed GB boundaries, including in relation to site ST31. However, they reiterate that the detailed boundary assessments fail to consider all Green Belt purposes of national planning policy. While they also consider that clarification has been provided regarding the methodology and assessment criteria, there remains concerns relating to the robustness and comprehensiveness of the assessments undertaken. There is no comparison of the sites that were submitted during the call for site process in order to justify and support the site allocations – consider that a degree of transparency is still missing from the Green belt assessment process.
372	Gladman Homes	Section 05 Housing	H5 Gypsies and Travellers	Raises concerns regarding the proposed modifications to Policy H5 and the suggested application of the policy requirements across different sized allocated sites. There is no inherent relationship between delivery of strategic residential development and the need for onsite G+T accommodation. Further, there is no evidence on need on specific sites.
372	Gladman Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Considers Local Plan sound in relation to GB TP1 addendum. GB boundaries do not need to be justified by the existence of exceptional circumstances. However, several methodological flaws identified, including that it omits consideration against all 5 GB purposes and evidence on which the assessments are based is outdated.
372	Gladman Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Although proposed detailed boundaries of the Green Belt have the ability to align with the requirements set out in para. 79&80 of the NPPF, respondent believes that further clarification is still required regarding the Green Belt methodology and associated assessments.
372	Gladman Homes	Section 05 Housing	H5 Gypsies and Travellers	Requirement for Gypsy and Traveller provision on strategic sites should be deleted from policy H5.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
375	Wheldrake Parish Council	Section 05 Housing	Site Allocation ST33	The sites identified are credible and as Wheldrake Parish Council is concerned, site ST33 is appropriate for housing albeit with caveats relating to this village extension.
375	Wheldrake Parish Council	Section 05 Housing	Site Allocation ST33	Wheldrake Parish Council recognise the need for additional housing within the CoY and agree that the brownfield sites such as the former railway land within Wheldrake is suitable to accommodate housing.
375	Wheldrake Parish Council	Section 05 Housing	H1 Housing Allocations	Wheldrake Parish Council believes that it is important that no further significant housing development should be permitted within the Parish for the life of the Local Plan presently under development.
375	Wheldrake Parish Council	Section 05 Housing	Site Allocation ST33	Wheldrake Parish Council agree that the proposed development needs to include the provision of homes for first time buyers (including shared ownership) and an affordable letting portfolio.
375	Wheldrake Parish Council	Section 05 Housing	Site Allocation ST33	Wheldrake Parish Council is concerned that the necessary expansion of the primary school is funded and provided in advance of the significant increase in the number of children that is likely to occur with the provision of 147 new homes.

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375	Wheldrake Parish Council	Section 05 Housing	Site Allocation ST33	Wheldrake Parish Council would like to see the construction of the new junction delivered before any of the new homes are occupied and that these works should also provide for pedestrian crossing to the North side of Main Street as there is no footpath on the South side of the street.
375	Wheldrake Parish Council	Section 05 Housing	Site Allocation ST33	Wheldrake Parish Council would like to see all Section 106 funding being spent solely within Wheldrake to provide for mitigating the impact of the significant village extension on the existing village and ensuring that necessary infrastructure arising from the new development are provided.
375	Wheldrake Parish Council	Section 05 Housing	Site Allocation ST33	WPC wishes to work with the developers of the village extension rather than oppose the principle of the development.
378	Langwith Development Partnership Ltd (LDP)	Whole Plan	-	There are evident conflicts in respect of policy considerations between NPPF 2012 and NPPF 2019. The foundations and the policies contained within the emerging plan it have been constantly evolving, it has been necessary for CYC to update the evidence base during the past three years compounding complications of reconciling changing policies between NPPF 2012 and NPPF 2019.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The emerging Plan is unlikely to be adopted, if found sound, until 2022/23. There will remain only 11 years at best. NPPF 2012 and NPPF 2019 identify a 15 year time horizon for plans order to take account of longer-term requirements. The Plan Period currently promoted within the emerging Plan is now out of date and should be extended.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	National Policy requires the Green Belt Boundary to be set "...having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period. The Plan Period currently should be extended so that at least 15 years of the Plan Period remains after adoption and given that CYC do not propose to "safeguard" land (remove land from the Green Belt, for development after the plan period), then the Green Belt needs to be drawn so that it meets development needs with allocations sufficient to meet needs to 2043.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In light of the need to extend the "Plan Period" for enduring Green Belt purposes, it is requested that the Plan Period and Post Plan Period are clarified as being: Plan Period – 2017-2038 and Post Plan Period – 2038-2043. This should be reflected throughout the emerging Plan.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Policy SS1 should be amended to: (1) Extended Plan Period to 2037/2038 (maintaining a start to the Plan Period of 2017). (2) In order to ensure Green Belt permanence beyond the Plan Period, sufficient land should be allocated for development to meet a further minimum period of five years after the end of the Plan Period (i.e., 2042/2043). (3) Deliver a minimum average net provision of 1013 dwellings per annum over the Plan Period, based on Standard Method (2020). (4) Set a minimum housing requirement for the City of 21,273 new homes during the concluded Plan Period up to 2038. (6) To identify a requirement for a further 5065 new homes, post the Plan Period (for a period of 5 years). Corresponding changes are necessary to the Explanation of the policy.
378	Langwith Development Partnership Ltd (LDP)	Section 05 Housing	Site Allocation ST15	ST15 should be amended to increase its site size, estimated yield and the estimated phasing (as referenced in Application 13 of LDP's representations to Regulation 19 draft Local Plan). Corresponding changes are necessary to the Explanation of the policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York3	Policy SS13 should be amended to: (1) Increase the housing yield, and delivery trajectory in the first part of the Policy. (2) Extend the boundary of the allocation to match that of Langwith. (3) Modify Criterion (VII) to remove the requirement for ecological mitigation and compensation measures “five years prior to the commencement of any development”. (4) Modify Criterion (XII) to recognise that a second access via Elvington Lane is essential to enable delivery of the new settlement.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The policy conflicts between NPPF, 2012 and NPPF, 2019 are most evident in relation to housing need. The emerging Plan still fails to adequately meet the full OAN for York and this is further compounded by the evident suppression of the OAN even when adopting the methodology of NPPF 2012. The Government’s overriding priority is to boost housing and the City of York Local Plan actively chooses to restrain. The emerging Plan is therefore unsound and to make the plan sound the housing requirements (Policy SS1) should be increased substantially over the Plan Period.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There have been meaningful changes and the plans evidence is ignoring these. While there is always going to be new data available, the demographic, housing and economic evidence that CYC fail to properly take into account and plan for have been increasingly clear since 2015/16. Planning Practice guidance requires household projections to be adjusted in certain circumstances and that any meaningful change should be addressed.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The new standard methodology (2020) identified that the 20 largest cities and urban areas should increase their supply by 35% the 2018 standard method need figure. York is not one of these urban areas, but the new standard methodology demonstrates a significant uplift in housing requirements of 1013 d.p.a which is 25% more than the emerging Plan is seeking to promote.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Whilst the emerging Plan is being assessed for its soundness under NPPF 2012, this is not appropriate as it suppresses the ‘true’ housing need. York has a much greater housing need than CYC have identified and this is supported by what is happening i.e. where there is an increasing affordability gap and growing need for affordable homes that is simply not being met. Given the examination delay, there are strong grounds for the housing provision target to be based on the latest standard method (2020) in the interests of sustainable planning and to ensure consistency with much of the rest of the country to avoid further delay.

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	While it is possible to argue that under the NPPF 2012, the 2014 sub-national -household projections provide the right and aspirational projections to use as a starting point, there remains a key missing element of the Plan's evidence on economic strategy and linked employment forecasts that reflect the growth that has not only happened but is expected to happen locally.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Any alternative to the Standard Method calculated housing figure would require jobs led forecasts consistent with the Council's yet to be seen Economic Strategy and which includes fully the range of "build back better"/levelling up /current economic investments including the York Central development. The outputs of this exercise would still need to be adjusted for an affordability uplift, and should use the 2014 projections, to be consistent with the rest of the country.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The last two pieces of CYC housing need evidence are only partial in scope and based on selective consideration of the latest data. York has been experiencing a demographic slowdown in the last decade. The main driver in this is more young(er) middle aged people leaving York in both years 2018/19 and 2019/20, than was the case in the early years after 2011. EX/CYC/9(Jan 2019) and EX/CYC/43a (Sept 2020) do not address this shift or the trends behind.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The latest Housing Needs update (EX/CYC/43a) does not comment or provide an update on the worsening affordability issues in York and lack of significant additions to affordable housing stock. Given the extent of the seriousness of unaffordability in York has been addressed in previous iterations of the housing evidence work, it is an omission to not test whether matters are materially worse.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing in York is demonstrably more expensive in 2019/20 than it was in 2011, and the affordability trends have worsened. Worsening affordability for newly forming, or moving households can be a main factor in people leaving an area to access housing they can afford, or of the right size, mix tenure etc. However, because the demographic changes have not been investigated, there is no analysis or investigation as to the extent these two factors are linked.

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The latest Housing Needs update (EX/CYC/43a) tests some of the assumptions behind the jobs target from previous work of 650 jobs per year, the Housing Need update report does not test or challenge the lower jobs targets that are the main findings of EX/CYC/29 directly
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There is a circularity to CYC's case. Previous submissions show that the affordability issues and lack of supply have led to a slowdown in population growth. The Council is choosing to rely on projections that increasingly reflect this slowdown as the basis for predicting future growth levels.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The relevant regulations that sit behind the submission and examination of the plan do not specify that it is an either or adjustment between economic led adjustments to ensure the working age population can meet expected job growth and the need to adjust for affordability issues. These two issues are different and need to be considered jointly.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook does not read across and does not inform the EX/CYC/43a Housing need update in substance.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is unclear why the housing needs work EX/CYC/43a has not reconciled the different approaches to population, and hence household growth between in Ex/CYC/29 Economic Outlook

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The York Economic Outlook (December 2019) (EX/CYC/29) which underpins the Housing Need Assessment underestimates the economic potential which CYC are planning to facilitate. There is a reluctance to model a York specific growth strategy based on stronger employment growth and the uplift from York Central (beyond a construction boost) and other projects.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	York continues to perform well economically and importantly in employment terms. On top of this recent performance, it has long established plans in place to significantly boost both economic output and employment, through ongoing investments from and with the Universities, and through key projects such as York Central. Employment and economic growth evidence underpinning EX/CYC/29 is flawed. It does not adequately capture stronger employment generation in recent years and does not explain why York's employment performance would shift from the recent strong growth to a much lower level. It also fails to factor in the scale of the positive policy on investments and projects would lead to growth above recent employment trends.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Plan and its supporting evidence reflect a less ambitious future for York and is reliant on an out of date Economic Strategy. The current economic strategy (2016-20) SD070 is part of the examination library. Given the significant shifts in national regional and economic policy, it is unhelpful that the new Economic Strategy is not part of the current consultation; it would present a more complete picture of the new economic strategy for it to be considered alongside economic evidence at this stage in the plan process.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There is no confirmation EX/CYC/29 Economic Outlook that it informs the York Economic Strategy that is under preparation, and projects annual job creation for the Plan period below that the level that EX/CYC/9 and EX/CYC/43a rely on. It is unlikely that EX/CYC/29 Economic Outlook target of 510 will take forward the 510 jobs.

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook is pre Covid and pre-Brexit actual impacts. As such it would be helpful for the Council to confirm that they give this report weight going forward. By publishing it as evidence to be consulted on they presumably do.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook presents a reprofiled scenario which adjusts employment for key professional, insurance financial sectors upward by 20% and slows growth in food and accommodation and retail sectors by 10%. The rationale and justification for this reprofiling is not set out in detail.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook is unclear about the future of York's economy – the level of growth the Council want to support and how this influences their approach to setting the right housing target to ensure that the area has the working age population to meet future demand, without reliance on importing commuters.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook applies a more pessimistic national view on the York economy, not a 'policy on' bottom up growth scenario. The 'local growth with some decline scenario' further bakes in an uninspirational view of York's growth potential.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook has two outputs, the UK wide Oxford Economics November 2019 results, (compared to previous 2015 Oxford work which led to the GL Hearn 690 jobs figure), and a reprofiled sector scenario which sets out the impact of faster growth in professional, scientific & technical services, financial & insurance and information & communication sectors, accompanied with lower growth within wholesale & retail trade and accommodation & food services. There is no assessment of whether this growth includes the York Central outputs.

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook does not clearly reference the North Yorkshire LEP (and Leeds City region LEP) Strategic Economic Plan in 2014/2016 or whether the City of York Council have a specific York Strategic Economic Plan.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook base dates differ to the both the Plan and EX/CYC/43a
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/29 Economic Outlook also highlights that job creation in the 2014-18 was over 1,000 a year, matching published data. York Central and the Government's levelling up agenda means that the consideration of the Housing Need implications of current economic prospects is seriously flawed and not back up by Oxford Economic work and recent employment performance. It seems to set out results that do not match recent and current actual employment growth in the area or demographic trends.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is unclear if the Council agrees with the EX/CYC/43a (para 3.2) that 510 jobs per year to 2038 represents a broad corroboration of 650 jobs per year.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The SHLAA Update (April 2021) EX/CYC/56 and MHCLG data EX/CYC/59i break the completions down between general housing (2,305 homes) and student/communal student accommodation (104 homes). Both documents suggest that the delivery of student accommodation is low (just 4.3%). This is a significant misrepresentation. During the three-year period, 35% of all completions (820 of the 2,409 units) were student/communal accommodation (Appendix 2 of EX/CYC/56). The delivery of traditional housing, excluding student accommodation, is only 530 units on average per annum (this compares to a housing requirement of 832 of the CYC's own

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				assessment and 1013 under the Standard Method 2020). This is during a period when there has been a strong housing market indicating a major constraint on housing land supply in York.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing supply “shortfall” is skewed by the significant level of purpose built student housing. The shortfall in delivery of traditional housing in the first three years of the emerging Plan is greater than CYC have accounted for and, consequently, this has an impact on the future housing needs which has not been taken into account by CYC in their housing supply (EX/CYC/59i).
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Planning Practice Guidance (034 reference ID: 68-034-20190722) identifies that the inclusion of student housing is only accountable where it releases wider traditional housing (by allowing existing properties to return to general residential use) or it allows general market housing to remain in such use, rather than being converted for use as student accommodation. The evidence supporting the Plan “does not have the level of understanding” to determine whether more purpose built housing stock would result in the release of traditional housing stock.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There has been a significant growth in the student population in York which is projected to continue and, it cannot be assumed that additional student accommodation should count towards meeting general housing requirement.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The difference in net additional dwellings between CYC Annual Housing Monitor and MHCLH Housing Flow Reconciliation Return 2019 (EX/CYC/32) is minus 1,834 units; that is a difference of circa 25% less than that which CYC considered to be delivered during the ten-year period (2007/2008) to 2016/2017. Whilst EX/CYC/32 seeks to explain the differences, it remains unclear why there should be such a wide difference in the housing completions reported by CYC and MHCLG. This adds to the historic shortfall of housing delivery and, therefore, further brings into question the efficacy of the housing trajectory.

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/59i suggests that there is a housing supply shortfall once you take into account the urban delivery of 2,946 houses during the period 2017 – 2038. This shortfall is to be accommodated outside the urban area of York. The which would arise under Standard methodology 2020 calculation is 7,117.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Some allocations may need to be reduced in capacity/housing delivery as a consequence of the findings of the HRA (EX/CYC/45).Accounting for this will increase the housing supply shortfall further.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There is a recognised finite supply of housing land within the existing urban boundary of York (EX/CYC/59i). Housing development is competing with a range of other land uses and it is evident that there has, been a reducing supply of sites in the urban area. This is not unexpected given the significant heritage constraints. Housing land supply is highly constrained without Green Belt release, even on CYC's own flawed approach to assessing housing need and if the standard method (2020) is adopted, the scale of housing need is much greater.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	Policies Map (Green Belt)	CYC have indicated that the Green Belt should endure for a minimum of 20 years from the start of the plan period (EX/CYC/50). As CYC do not intend to “safeguard” land for future development, allocations should have sufficient capacity to meet the future development needs. If the Plan Period is extended to 2038, and a period of Green Belt boundary endurance is applied, there is a need to allocate further land (beyond the three sites identified post 2038 (ST5, ST15 and ST36).
378	Langwith Development Partnership Ltd (LDP)	Section 05 Housing	Site Allocation ST15	The capacity of ST5 and ST36, post 2038 is limited to 572 homes only one year's supply against CYC's assessment of their annual housing need (EX/CYC/43a) and much less under Standard Methodology 2020. Langwith (or a variation of it) presents a sound and appropriate opportunity to meet both the short term and longer-term housing needs of the City, as it has the prospect of yielding a significantly greater number of homes (including affordable homes) than could be delivered by the existing ST15 site.

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378	Langwith Development Partnership Ltd (LDP)	Section 05 Housing	Site Allocation ST15	Langwith (or a variation of it), will deliver a significantly greater level of affordable housing than would be achievable on ST15. EX/CYC/56 (Affordable Housing Note Final February 2020) suggests that 835 affordable new homes could be delivered in total on ST15, but only 595 during the Plan Period. However, the trajectory for housing delivery EX/CYC/36, which has consequent impacts on affordable housing delivery, is unrealistic. LDP consider ST15 could only deliver 79 affordable housing units during the Plan Period and only 315 by 2038. Conversely, for Langwith, this would be a minimum of 318 (and possibly up to 399) by 2033 and 597 (up to 720) affordable homes by 2038.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 8 of EX/CYC/59 drawing on Heritage Topic Paper (SD103) recognises that the compactness of York is an important heritage characteristic and the importance of keeping land permanently open in those cases where it is necessary to protect the special character and historic setting of York. It does not require all land to remain permanently open as not all land contributes to its setting.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	CD103 and EX/CYC/59 recognise the six principal characteristics of the historic environment and special qualities of York include amongst a number of matters, the City's compactness. That is however, in relation to York itself. The setting of the Green Belt boundary for freestanding settlement allocations beyond York's main urban area is based on an erroneous concept that such allocations should be "compact". It is LDP's view that CYC's reference to the compactness of the villages (paragraph 8.23 of EX/CYC/59) is recognising the need for them to be self-contained within a wider landscape setting, rather than in a concentric form.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The concentric nature of the City itself is not reflected in the existing smaller settlements that surround York; these are more linear in form which is characteristic of North Yorkshire villages. The application of "compactness" should be applied differently for new freestanding settlements. It is not necessary for these to be concentric form that would be uncharacteristic of the linear settlements which surround York.

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378	Langwith Development Partnership Ltd (LDP)	Section 05 Housing	Site Allocation ST15	For the purposes of an enduring Green Belt boundary, and in order to meet a longer Plan Period, a larger settlement boundary at ST15 (akin to Langwith, or a variation of it) is appropriate as demonstrated in previous evidence submitted by LDP (EX/CYC/21b pages 2187- 2328 and CD014G at pages 358-1059) having regard to the five purposes of Green Belt, as well as being clearly defined and identifiable. Quod have updated this analysis (supplied as Appendix 5) and this demonstrates Langwith (or a variation of it) would satisfy the three key purposes for setting York's Green Belt (i.e. purposes 4,1 and 3). Langwith can be carefully designed to provide strong and identifiable boundaries, which are well defined and capable of containing development in an appropriate manner without causing harm to the main purposes of York's Green Belt.
378	Langwith Development Partnership Ltd (LDP)	Section 05 Housing	H1 Housing Allocations	The proposed spatial strategy to meeting housing need, which recognises the need and appropriateness of meeting this in part via a new settlement in the south east of the City is soundly based, given the need to meet York's housing needs whilst minimizing heritage impacts.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The audit trail of sites (35-100 ha) (EX/CYC/37) is helpful in understanding the various iterations and considerations of a new settlement in south east York and, when considered against the Sustainability Assessment (EX/CYC/62) and the evidence presented by LDP as part of the previous reports. It is clear that Langwith is a sustainable allocation.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York3	The proposed access to the A64, even though shown indirectly on the Proposals Map, is not technically achievable. There is a need for a second access (via Elvington Lane), which the emerging Plan does not recognise as necessary despite the operational shortcomings of a new settlement reliant on a single point of access (for merging vehicles in particular) and the timing and viability issues arising from reliance on the proposed access from the A64. Policy SS13 of the emerging Plan acknowledges a second point of access may be "potentially" required, it fails to recognise that a second point of access is necessary.

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York3	LDP consider that Langwith is a sustainable and sound allocation, whilst ST15 is unproven in terms of it being deliverable. The boundary could be varied to its west to match up with the boundary of ST15, which would have the effect of modestly increasing Langwith. This revised boundary would be equally sustainable from an environmental perspective and better meet the strategic development needs of the City. ST15 could only be potentially deliverable if a second point of access onto Elvington Lane was provided, enabling early housing delivery, without reliance in the A64 access at the beginning of the delivery of the allocation
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York3	LDP have been in discussions with CYC in relation to the soundness of ST15, and the lack evidence in respect of viability, highways/transportation (including public transport links) and biodiversity. LDP are aware that CYC have commissioned further work to inform and determine these issues and it is anticipated that in due course, LDP and CYC will prepare a Statement of Common Ground in relation to the soundness of the boundary of ST15.
378	Langwith Development Partnership Ltd (LDP)	Section 05 Housing	Site Allocation ST15	CYC is overly optimistic in the trajectory of housing delivery in relation to ST15 and this is not appropriate, given previous representations by LDP (EX/CYC/21b (pages 2187-2328) and CD014G (pages 358-1059) which demonstrated that the trajectory was overly ambitious. The trajectory for both open market and affordable housing (EX/CYC/59j) is unachievable and unsound because there is intended to be only a single point of access to serve ST15. This which would require the delivery of a significant piece of infrastructure which would take some considerable time even if funding from external sources could be found. There is no prospect of housing delivery on ST15 by 2023.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS13 Land West of Elvington Lane/ Site Allocation ST15	With modifications to Policy SS13 and boundary changes that trajectory can be improved to the benefit of housing delivery. In the alternative (to a single access point from the A64), Langwith can be accessed from Elvington Lane, is capable of delivering housing at its eastern end in the short term, subject only to planning consent and avoiding the programme, cost and cashflow issues arising from a sole reliance on the proposed A64 Junction. Langwith delivers at a much quicker rate than ST15.

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378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	The HRA (EX/CYC/45) and its accompanying appendices (EX/CYC/45a) have no material implications for ST15 LDP note that ST15 will have no adverse effect Strensall Common SPA, and the case of no impact on the Lower Derwent Special Protection Area (SPA) so long as modifications are made to Policies SS13 (and consequently ST15) and Policy G12 (and allocation OS10). It is LDP's ecological advisors (Environment Bank) view that the same conclusions can be drawn for the Langwith proposals, or a variation of it as for ST15.
378	Langwith Development Partnership Ltd (LDP)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	LDP support the proposition that development of a new settlement in this area should not proceed without establishing of an appropriate ecological mitigation area. This mitigation is important in not only controlling the potential impacts to the SPA, but in mitigating the direct impacts to the Elvington Airfield Site of importance for Nature Conservation (SINC) and potential indirect impacts to nearby Heslington Tillmire Site of Special Scientific Interest (SSSI). But set out previous representations, it is not necessary for the ecologic mitigation to come forward five years clear of any development taking place
378	Langwith Development Partnership Ltd (LDP)	Section 05 Housing	Site Allocation ST15	The Strategic Flood Risk Assessment (EX/CYC/61) demonstrates that there are currently no strategic development Sites in high flood risk areas. Whilst a small part of ST15 is shown to be in Flood Zones 2 and 3 any limited localised flood risk within this part of any future allocation is capable of being mitigation through careful masterplanning. This would be equally applicable to Langwith.
381	Yorkshire Wildlife Trust	Section 09 Green Infrastructure	G12A Strensall Common SAC	New Policy G12a – Strensall Common SAC - Yorkshire Wildlife Trust believes the plan was positively prepared by responding to previous consultation comments believes that the plan will be more consistently justified, effective and consistent with national and international policy on the protection of habitats due to the new Habitats Regulation Assessment which has led to the introduction of policy G12a
381	Yorkshire Wildlife Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Yorkshire Wildlife Trust considers the inclusion of Moor Lane as the edge of the urban settlement as a 'logical approach' – the Green Belt at this point maintains openness and the rural setting of York and protects the Trust's reserve at Askham Bog from urban impacts

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381	Yorkshire Wildlife Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	The proposed modification (PM29) is reasonable
381	Yorkshire Wildlife Trust	Section 05 Housing	H1 Housing Allocations	Policy H1 Housing Allocations - supports the removal of Queen Elizabeth Barracks (ST35/H59) from the allocations
383	Natural England	Whole Plan - Habitats Regulations Assessment	-	Respondent supports updated HRA.
383	Natural England	Whole Plan - Sustainability Appraisal	-	Respondent supports updated Sustainability reports.
383	Natural England	Whole Plan - Habitats Regulations Assessment	-	Respondent is satisfied that their comment have been taken into account.

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383	Natural England	Whole Plan - Habitats Regulations Assessment	-	Respondent consider proposed modifications are sound.
383	Natural England	Section 03 Spatial Strategy	SS9, SS1 Delivering Sustainable Growth for York0, SS1 Delivering Sustainable Growth for York1 and SS1 Delivering Sustainable Growth for York2	PM58-PM61 Strategic Housing Sites:- Respondents (Natural England) note that revised HRA recommends changes to the policy wording for policies SS9, SS10, SS11, and SS12 in order to specify the need for mitigation measures to avoid adverse effects on Strensall Common SAC. Respondent welcomes modifications PM58-61 which clearly set out the requirements of a recreation and open space strategy, and helpfully cross refers to policies GI2a and GI6 Open Space Provision for more detail as recommended in the updated HRA.
383	Natural England	Section 05 Housing	H1 Housing Allocations	PM65 Housing Allocations:- Respondents (Natural England) pleased to see the additional modification to the supporting text for policy H1 which provides clarity regarding the approach to recreational disturbance for housing allocations in proximity to Strensall Common SAC.
383	Natural England	Section 09 Green Infrastructure	GI2A Strensall Common SAC	PM70 New Policy GI2a Strensall Common Special Area of Conservation:-Respondent (Natural England) was consulted on the proposed wording of this policy as part of wider consultation on the HRA. Respondents consider that this policy satisfies the requirements set out in the Habitats Regulations Assessment and provides vital clarity on housing development in proximity to Strensall Common SAC. Respondent consider the approach taken to be proportionate, evidence based and positive for nature conservation.

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383	Natural England	Section 09 Green Infrastructure	GI2A Strensall Common SAC	PM71 New Policy GI2a Strensall Common Special Area of Conservation:- Respondent (Natural England) welcomes justification paragraphs proposed for the supporting text for new policy GI2a. This is additional to the policy text respondent was consulted on previously and respondent consider that it provides helpful context and explanation for the policy.
383	Natural England	Section 03 Spatial Strategy	Policies Map (Green Belt)	PM101 Policies Map North:- Respondent (Natural England) notes the amendments made to the Green Belt boundary and has no concerns regarding Strensall Common SAC and SSSI.
393	Cllr Nigel Ayre - Residents of Heworth Without	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Proposed modifications are legally complaint as there is clear downward pressure from demographic trends in the City of York. The 2018-based household projections see a need for 302 dwellings per annum over the 2017 to 2033 plan person and 352 dwellings per annum over the 2012 to 2037 period.
393	Cllr Nigel Ayre - Residents of Heworth Without	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Based on the delivery of 650 jobs per annum the City would need to deliver 777 dwellings per annum over the plan period to meet the City's economic growth. This falls to around 766 dpa when looking over a longer period. However, this would increase if the Council decided to provide a greater level of accommodation for these jobs within the City rather than rely on an external supply from neighbouring boroughs. And results in a marginally higher housing need in the City of 779 dpa over the Plan period and to 788 dpa over the 2012-37 period.
393	Cllr Nigel Ayre - Residents of Heworth Without	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Given the extent of the economic need and the uplift this entails from the demographic starting point a further uplift would not be merited. For example, for the Plan period, the economic-led need of 779dpa is 157% higher than the demographic starting point of 302 dpa.

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393	Cllr Nigel Ayre - Residents of Heworth Without	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. To conclude, as local councillor, respondent believes that the housing need in the City would be sufficiently addressed through the proposed modifications, as it has not changed materially since the last assessment in January 2019. There is, therefore, no need for the Council to amend their current position based on this new data.
393	Cllr Nigel Ayre - Residents of Heworth Without	Whole Plan	-	Respondent considers the document to be sound. Believes it to be positively prepared, justified, effective, and consistent with national policy.
393	Cllr Nigel Ayre - Residents of Heworth Without	Whole Plan	-	In the period of 30/06-07/07 a total of 187 York residents wrote to us in support of the proposed modifications, as a part of a city-wide survey. Therefore, these arrangements have the broad support of the local community
393	Cllr Nigel Ayre - Residents of Heworth Without	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Purpose 4 Preserving the setting and special character of historic towns – IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PRESERVE THE SETTING AND SPECIAL CHARACTER OF THE HISTORIC CITY/ Land should be kept permanently open as part of a wider view of a dense compact city in an open or rural landscape./ Land should be kept permanently open as part of maintaining the scale, identity and distribution of York and its districts and maintaining a connection to open and historic setting./ Land should be kept permanently open to aid the understanding of the historical relationship of the city to its hinterland. /Land needs to remain permanently open to aid the understanding or significance for the situation of a designated landscape, park or garden./ Land should be kept permanently open as part of maintaining the scale, identity and distribution of settlements around York and to maintain a connection to open and historic setting and to constrain development from coalescing./ Land is sensitive to understand the original siting and context of landmark buildings and their visual dominance of the Minster.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
393	Cllr Nigel Ayre - Residents of Heworth Without	Section 03 Spatial Strategy	Policies Map (Green Belt)	Purpose 1 Checking unrestricted sprawl/ IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO PREVENT UNRESTRICTED SPRAWL. Land connected to urban area and therefore relevant for sprawl. Land has an increased risk of sprawl occurring through the presence of existing structures. Land is constrained by built development and strong boundaries on more than one side, and therefore contained and enclosed in a way which would prevent sprawl./ Land is constrained by strong boundaries on more than one side however there is still a risk of sprawl.
393	Cllr Nigel Ayre - Residents of Heworth Without	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Purpose 3 Safeguarding the countryside from encroachment/ IT IS NECESSARY TO KEEP LAND PERMANENTLY OPEN TO SAFEGUARD THE COUNTRYSIDE FROM ENCROACHMENT/ Land predominantly characterised by absence of built development or urbanising influences and the land functions as part of the countryside in terms of relationships or acceptable uses within it./ Land contributes to the character of the countryside through openness and views. /Land functions as part of the countryside in terms of relationships or acceptable uses within it.
399	Cllr Anthony Fisher	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 4: Respondent strongly supports the Council's preferred option of retention of the Green Belt boundary as being the rear of the properties along Southfields Rd and The Village, as on p268.
399	Cllr Anthony Fisher	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the Council's decision to reject this boundary: The York Scarborough railway line. Respondent objects to this on the grounds that: 1) The land between The Village and the railway has been the subject of planning appeals in 1994 (123 dwellings) and 2016 (11 dwellings on part of the site). Both were refused by planning inspectors. 2) The land has considerable wildlife value, including a pond inhabited by Great Crested Newts. Much of the site is within the foraging distance of this pond.
399	Cllr Anthony Fisher	Section 03 Spatial Strategy	Policies Map (Green Belt)	The other alternative boundary is Flaxton Rd. Respondent objects to this, as land is too close to Strensall Common SAC/SSSI. This is an extremely sensitive site and the Local Plan proposes a protection zone around it where development would be severely constrained. This is necessary to protect the extremely rare habitat of the Common.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
399	Cllr Anthony Fisher	Section 03 Spatial Strategy	Policies Map (Green Belt)	Both alternative boundaries for Boundary 4 Strensall would harm the historic setting of the village and lead to sprawl.
399	Cllr Anthony Fisher	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 5: Respondent supports the Council's decision to modify the Green Belt boundary from Ox Carr Lane to include the most densely developed parts of the Queen Elizabeth Barracks site. This will allow a wider range of potential uses for the site when the MOD relinquish the site in 2024.
407	Private Individual	Whole Plan - Sustainability Appraisal	-	Respondent does not consider the document to be legally compliant. Proposed modifications to the plan do not comply with the statutory regulations or follows the requirements of the sustainability appraisal. General impression of working back from preferred site options with an emphasis on process over product.
407	Private Individual	Whole Plan	-	Respondent does not consider the document to comply with the Duty to Cooperate. Hostility towards ordinary members of the public due to the technicality and complexity of the document - This has not been a genuine public consultation
407	Private Individual	Section 05 Housing	Site Allocation H39	Plan is not sound as not "Positively Prepared" - The plans strategy leading to the allocation of site H39 is not based on comprehensively and consistently applied objectively assessed development and infrastructure requirements.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
407	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	H39 (Site 95) Requires an Appropriate Assessment. The Pre- Publication draft (2017) HRA was at a high "generalised" level, and the issues of recreational pressure and pet predation on the River Derwent Ramsar/SAC/SPA were not properly addressed. Increased Pet predation of wildlife will come from both the new homes (which would be within 200m of the designation) and through increased use of the footpath by the church linking to the Wilberforce Way for dog walking. Site H39 was therefore "incorrectly" screened out and removed from further consideration of Appropriate Assessment and mitigation for impacts on the nature conservation site.
407	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	Pressures resulting from increased pet walking 'are likely to work against the restoration of the Ramsar/SAC/SPA to favourable conditions being undertaken by Natural England and the Environment Agency.
407	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	Within Annex B of the 2020 Waterman HRA localised effects of H39 on the River Derwent Ramsar/SAC/SPA should not be ruled out due to lack of access - as Church lane and the Wilberforce way provide access to the nature conservation area.
407	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H29	Within Annex B of the 2020 Waterman HRA there is disparity in the suggestion that the River Derwent nature conservation site is largely confined to the Channel and regarded as relatively resistant to public pressure when assessing the impacts of H29 - The appropriate assessments for sites SS13/ST15 and SS18/ST33 go against this by recognising likely significant effects from recreational pressure and proposing mitigation.
407	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	H39 should be screened in by the HRA for Appropriate Assessment and included in table 5 - page 34 of the waterman 2020 report

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
407	Private Individual	Section 05 Housing	Site Allocation H39	The Plan is not sound as not "Justified" - H39 (Site 95) is not the most appropriate when considered against reasonable alternative locations and proportionate evidence
407	Private Individual	Section 05 Housing	Site Allocation H39	Respondent believes, on the basis of soundness, the plan fails to ensure consistency with national policy in which the strategy leading to the allocation of site H39 does not deliver sustainable development in accordance with the policies in the national planning policy framework.
407	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	The Wilberforce Way should be recognised as an in-combination "project" which has the potential to have a significant effect on the River Derwent Ramsar/SAC/SPA when considered in combination with site development proposals at H39.
407	Private Individual	Whole Plan - Habitats Regulations Assessment	Site Allocation H39	The Waterman HRA 2020 is not taking a precautionary approach to H39 based on the language used and that appropriate assessments and mitigation have not been proposed to sufficiently remove all reasonable scientific doubt about the risk of potential effects.
407	Private Individual	Whole Plan - Sustainability Appraisal	-	Proposed modifications to the plan do not comply with the statutory regulations or follows the requirements of the sustainability appraisal. General impression of working back from preferred site options with an emphasis on process over product.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
407	Private Individual	Section 05 Housing	Site Allocation H39	Preferred sites consultation document (2016) claimed that H39 would reduce impact on climate change. There is a lack of published methodology or explanation to back this statement up. Comparative to other sites, H39 is further from where people work and has limited local transport services resulting in a high dependence on private car use.
407	Private Individual	Whole Plan - Sustainability Appraisal	-	The SA methodology employed by CYC has not used common practice to remove subjectivity in appraisals at the strategic level through the use of detailed sub-objectives and a consistent basis for testing the sustainability performance of sites.
407	Private Individual	Whole Plan - Sustainability Appraisal	-	The SA methodology makes no attempt to weight sustainability scores and performance of alternative housing sites. Some issues, such as maintaining the openness and amenity of Green Belt should be more important considerations than others. It is not realistic to assume all are of same importance and therefore the SA is not sufficiently objective
407	Private Individual	Whole Plan - Sustainability Appraisal	-	Lack of clarity for Green Belt considerations in the SA process - Whilst Page K103 (2018 SA?) sets out the approach to GB, there is no specific GB Criterion to offer consistent comparison between alternative sites here or in the environmental criteria set out in appendix G (2018 SA?).
407	Private Individual	Whole Plan - Sustainability Appraisal	-	The SA methodology offers no rationale for the 22 point overall score cut off

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
407	Private Individual	Whole Plan - Sustainability Appraisal	-	Earlier Versions of the SA suggested that potential negative effects on the Green Belt exist and can be monitored (SA Appendix j 2018 GB1 to GB4) - No information in the most recent published documents is provided on what the negative effects on GB are, how or if these will be monitored and if the monitoring of these effects can have a significant influence on the SA process.
407	Private Individual	Section 05 Housing	Site Allocation H39	Site H39 does not constitute a sustainable development site when balancing economic, social and environmental objectives as there is poor access to public transport, employment, retail and leisure activities.
407	Private Individual	Section 05 Housing	Site Allocation H39	Respondent makes references to City Of York Local Plan: Preferred Sites Consultation Document (2016)
407	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent highlights the inconsistency and subjectivity of the analysis with respect to the implications of developing Green Belt within the Addendum to the sustainability Appraisal as no objectives for landscape make a reference to the Green Belt.
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Respondent disagrees with the scoping principle (page A4:81) that states that Elvington village "does not contribute to the openness of the Green belt", instead believes parts of the village environs, such as site H39, do contribute to the openness of the Green Belt.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	With reference to GB purpose 1 (criterion 4) (page A4:86), respondent finds the Green Belt analysis not sound, in its failure to recognise the inner boundaries of site H39 representing a soft boundary and gradual transition from agriculture to village. This creates a valuable visual amenity and provides an existing and well established "landscape buffer"
407	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	With reference to GB purpose 1 (criterion 4) (page A4:87), respondent emphasises the need for an explanation as to support the following statement "the presence of a number of similarly large, detached properties in extensive grounds south of church lane risks further sprawl occurring".
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	With reference to GB purpose 3 (criterion 5) (page A4:88), the respondent finds the following statement contradictory to SP5, "while there are a number of isolated detached properties positioned along Church Lane, their setting in extensive grounds or agricultural use gives surrounding land a predominantly open and rural nature". Respondent argues this is further evidence to the existing visual amenity of site H39 in this part of the Green Belt. Church Lane also forms part of the Wilberforce Way - a major recreational route.
407	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	With reference to the Strategic permanence, (page A4:90) states that "Land to all edges of Elvington has access to two or more services within 800m, and therefore could potentially provide a sustainable location for growth". The respondent is unsure as to what these services are and the process of sustainable development constitutes much more than this.
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	With reference to page A4:95, there is "potential for the village of Elvington to grow within a sustainable pattern of development, to the southern extent of Boundary 4; the site represents a modest extension to the existing village of Elvington". In response to this, the respondent criticises the topic paper for not explaining how building houses in the Green Belt at site H39 can be considered to contribute towards sustainable development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	With reference to page A4:98, the respondent disapproves of the need to create a "landscape buffer" to the western boundary of site H39 as this area of land currently has a strong sense of openness with and established soft boundary, which is a visual amenity. the respondent argues that an artificial "landscape buffer" would represent an obvious urban extension and loss of visual amenity.
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Respondent references their rationale in relation to the NPPF in which they remark para 133 stating "the essential characteristics of Green belts are their openness and permanence". Respondent feels the analysis resulting in the allocation of site H39 ignores the important contribution the site currently makes towards the openness in this part of Elvington.
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Respondent references their rationale in relation to the NPPF in which they remark para 136 stating "once established, Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified". The respondent feels the local plan process has not provided evidence nor justification in site allocation for H39. Strong feelings regarding the omission of the Green belt protection as a sustainability Objective in the sustainability appraisal.
407	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Respondent references their rationale in relation to the NPPF in which they remark para 145 (e) referring to limited "infilling" in villages as a permitted exception to the protection of Green Belt, but site H39 would be visually apparent as an obvious urban extension.
418	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Suggests EX/CYC/46: Key Diagram Update Is removing land from the General Extent of The Green Belt unlawfully.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
418	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A Green Belt is created by 2 stage procedure: 1) Regional Plans define General Extent of The Green Belt, and 2) Local Plans define Green Belt Boundaries. Procedure identifies the task of defining the General Extent of Green Belt to be done through adoption of a Regional Plan, not a Local Plan. The General Extent of Green Belt is defined by the RSS(which is a Regional Plan) and forms The Statutory adopted Development Plan for York. The SOS has confirmed that the Government does not have the legal powers to create new RSS policies and therefore cannot exclude any land from the General Extent of The Green Belt defined within the RSS. (This is stated in the SEA of the RSS Partial Revocation Order. Page 55)
418	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Map in EX/CYC/46 Shows an area (incorrectly) identified as the 'York main Urban Area' excluded from the General Extent Of the Green Belt. The General Extent of the Green Belt in this map does not match General Extent of the Green Belt defined by RSS. There is no mechanism by which land could be removed from The General Extent of The Green Belt in the DP. This key map therefore is not consistent with the DP. The LP must be in general conformity with the DP and it is not.
418	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Activity of excluding land from the General Extent of Green Belt defined by the RSS is (ultra vires) unlawful. This is then being used as an incorrect starting point for the LP Green Belt Boundary assessment.
418	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Since required process is 2 stage process, not 1 stage or 3 stage process; The starting point for stage 2 must be the output of stage 1. The output of stage 1 is the definition of The General Extent of The Green Belt. If land is removed by this key map between stage 1 and stage 2 then it becomes a 3 stage process. 3 stage process is not a 2 stage process. It is required to be a 2 stage process.
418	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers underlying evidence base not to be robust. The area in the Urban Area of York is arbitrarily selected, based on the size and position of the squares of underlying data a different outcome could be reached. Not all the Green Wedges are identified on the map of green wedges, so land that fulfils green belt purpose is being included in the urban area designation.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
418	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Need to redo the way that urban area is calculated. Must not exclude this from General Extent of The Green Belt as defined by the RSS. Must start the LP GB boundary assessment by including all land in the general Extent of the green belt by the RSS.
422	Private Individual	Whole Plan	-	Local plan not considered sound. Not considered positively prepared, justified, effective, or consistent with national policy.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Object to proposed Green Belt Boundary 4 on page A4:127 EX/CYC/59f. Small parcel of land located immediately west of Boundary 4 serves no purpose in terms of protecting the setting of the city, protecting views of the city/Minister, preventing coalescence, preventing unrestricted sprawl and safeguarding the countryside from encroachment.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Fordland's Road) Accept rationale for Boundaries 1,2,3, and 5
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Considers boundary 4 significantly and materially different from other 4 boundaries.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) A19 and A64 provide the clear, legible boundary between the developed city edge and transition into open countryside. The site is completely screened from view by existing built development to the north and east and by mature trees to the south and west, therefore this land parcel does not display an open rural feel that require protection.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Development of this site would not result in development sprawl- in contrast it provides a sustainable opportunity for small logical rounding off/ finishing off development.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Development of this land would have no potential to result in coalescence with designer outlet, which is located 650 metres away beyond large fields which are themselves separated by the major expanse of the A19 and A64 highways.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Development of the site would have no impacts on the historic character of Fordlands Road including the public open space allotments and cemetery.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Respondent cannot agree that the located west of Boundary 4 and east of the A19 displays an open rural feel. The A19 is a significant built development, likewise the adjacent A64 and the associated slip roads, in contrast to being open, the land parcel is completely enclosed and screened from view by a combination of houses to the north and east and mature trees to the south and west. Together these existing building and natural landscape features would screen any development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Agrees with Council's own view that A19 and A64 serve to contain the potential extent of sprawl. Agree with the Council's own statement that any potential extent of sprawl associated with the land west of Boundary 4 would be limited by the presence of the A19 and A64 which strongly contain the land area. Agree with the Council's own assessment that the A19 and A64 comprise significant urbanising characteristics in the immediate vicinity of the Boundary 4 land, and both are strong barriers to any potential sprawl.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) There is not an absence of built development in the vicinity of Boundary 4, in contrast there are modern housing estates and major highways which already create an urbanising effect.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Agree with Council's own conclusion that the Boundary 4 area 'lacks the feeling of openness'. Agree that is not open. It sits next to dense housing development major roads, and it is completely screened by mature trees. It's the opposite of open
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) The land parcel immediately west of Boundary 4 is not needed to preserve the setting of the historic city and development of it would not result in sprawl of encroachment out into the open countryside.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Boundary 4 should be relocated further west to run along the eastern edge of the A19 and the northern edge of the A64 slip road. Boundary relocation would provide a perfectly reasonable, logical, recognizable, and permanent Green Belt boundary given the significant containing influence of the A19 and A64.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Agree with the Council's assessment the Fordland's Road displays an urbanized built up nature with a lack of openness and that is a sustainable location to accommodate some housing growth given its proximity and accessibility to services and facilities.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Council refers to this land as a Green Wedge, but it is evident even from the Council's own assessment that Boundaries 1,2,3, and 5 are decidedly more important and applicable to Green Belt purpose.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Boundary 4, Fordland's Road) Shift boundary 4 so that is next to the A19 will have no material impacts on Green Belt purposes. As such, respondent feels strongly that the council's approach to Boundary 4 is not positively prepared, justified, effective, or consistent with national policy.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Green Belt boundary should be changed to exclude from the Green belt the small parcel of land located east of the A19, north of the A64, south of Fordslands Crescent and west of Cherrywood Crescent. This would allow for a small amount of additional housing development at 'Fordlands Road', which would consist of a logical 'rounding off/ finishing off' development. There is already existing housing located directly to the north and east, and the site is also contained by the A19 to the west and the A64 to the south. Site is well screened from view by the existing mature boundary landscaping along the Selby Road frontage.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Housing development here would have no impact on the purposes of including land within Green Belt. There would be no effect on the setting of the historic city, there would be no resultant unrestricted sprawl, (because the site is already visually and physically constrained by existing housing development and significant road infrastructure, in addition to being well screened).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Development of this land parcel east of A19 would have no material effect on the distinctive character and compactness of Fordlands Road and would maintain separation between Germany Beck and the rest of Fulford.
422	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 4 Fordland's Road serves no purpose in terms of preventing coalescence with the designer outlet- the presence of the A19 and the A64 already provides this mechanism. Development of this site will have no impact on distant views of the Minister- the Council already accepts that views are obscured by existing trees and development.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent has issues with the methodology of the GB boundaries and believes there is inadequate justification for the inclusion of land west of ST8 within the Green Belt.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to the boundary of ST8. Does not believe this is the most appropriate long-term boundary for the plan period and beyond. The GB Addendum does not provide a fully justified reasoning for the resultant inner GB boundaries.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst ST8 is supported, defining land to the west and north within the GB is inappropriate and will not affect the issue of compactness. Respondent identifies the possibility of incorporating an adequate landscape buffer adjacent to the outer ring road

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST8 aligns with the council's strategic aims of channelling development towards urban areas and promoting sustainable patterns of development. This will form a wholly logical extension to the eastern urban edge of York, which would be contained within the outer ring road.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent criticises the methodology further with respect to a lack of consideration of the potential development put forward and the potential for an alternative boundary which allows for appropriate development to be accommodated in the longer term. No consideration put forward by interested parties. Such proposals will maintain the 'containment' of the urban area and openness will not be compromised.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent disagrees with the councils position on not designating safeguarded land. Required to provide a degree of permanence to the Gb boundary and avoid the need for future reviews.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The timescale of the York plan and the time of delivery is of concern. 4 years into the land period and so the five year buffer is dwindling and will be even less by the time the plan is adopted. there is greater justification to identify safeguarded land for beyond 2038.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes more areas should be designated as safeguarded land.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
582	Landowners of land west of ST8	Whole Plan	-	Respondent recommends that upon adoption a review of the local plan is immediately triggered.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	The outer ring road identified in Annex 1 is as a 'main road approach' however the respondent disagrees as no long distance views are interrupted by ST8 or land to the north or west. There are a number of panoramic, dynamic, general and key views, including a selection of views from the outer ring road.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent opposes the allocation of ST8 as a 'Residential Urban Extension' as it is proposed to extend north of Monks Cross business park and remain separate from the existing Huntington residential edge. as a result a thin strip of land between the existing and proposed areas of land emerges which as no GB function. A more appropriate, sustainable option would be to connect the urban extension to Huntington.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes the LP fails to make the best use of land within the outer ring road at ST8. The alternative approach of, fixing the outer ring road as the GB boundary with fixed landscape corridors, would be consistent with national policy.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes the alternative boundary would not detrimentally affect the understanding of the compact city within the original countryside context.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to criterion 2, there are opportunities through design of creating open corridors free from development to maintain any longer distant views. This has not been taken into consideration in the analysis.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to criterion 3, the creation of a landscape buffer either side of North lane, as well as alongside the outer ring road could mitigate this criterion and maintain an understanding of the relationship of the city to its hinterland. TP1 addendum does not provide a clear and justified reason for the detrimental impact that the release of land north of North Lane and west of ST8 will have on the GB purpose 4.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	with respect to criterion 4, there is no consideration for Monks Cross Link Road forming a logical and defensible boundary.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to criterion 5, the countryside feel of site ST8 will be maintained.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to local permanence, the assessment does not refer to considering alternative boundaries and refers to the proposed boundary using robust and permanent features. The outer ring road is a more appropriate long term boundary.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
582	Landowners of land west of ST8	Section 05 Housing	Site Allocation ST8	Respondent believes site ST8 should be increased
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to sound with regards to the housing needs update as this fails to meet the full OAHN
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to the council's approach to identifying local housing need. The continued use of the 2018 projections despite the PPG requiring the continued use of the 2014 based household projections
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The standard methodology housing requirement stands at 1,013 dpa which is significantly higher than the G L Hearn HNA of 790 dpa which ignores the direction of travel.
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The implications of fixing a housing requirement via the local plan that is lower than justified has significant implications for York and will lead to the worsening of an already severe affordability situation. Housing requirement likely to be increased in future reviews, therefore continuing to restrict the housing requirement will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Recommended that the housing requirement in Policy SS1 is increased to a minimum of 1013 in line with the standard method local housing need calculation
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Upon adoption, a review of the LP is immediately triggered to ensure the local plan is updated in line with the standard method and framework
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Recommend the undersupply of 512 is annualised over the first 5 years of the plan rather than over the plan period
582	Landowners of land west of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the housing requirement should be increased
583	Redrow Homes, and private landowners of ST8	Whole Plan	-	Respondent does not consider the document to be sound. Fails on all four tests of soundness.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing needs Update - fails to meet the full OAHN.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	TP1 Addendum - Issues with the methodology; inadequate justification for the ST8 boundary.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Increase the size of ST8. Designate safeguarded land. Respondent recommends that upon adoption a review of the local plan is immediately triggered.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the allocation of ST8 as a sustainable urban extension, however objects to the boundary extent of ST8.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes ST8 boundary as proposed, misses an opportunity of allocating further land and the boundaries proposed, which include a thin strip of land between ST8 and the existing urban edge and land north of North Lane does not fulfil GB requirements.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM50, 53. 54, 63a and 63b. Objects to the council's approach to identifying local housing need and their continued use of the 2018 projections despite the PPG requiring the continued use of the 2014 based household projections.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing requirement should be increased to reflect the up to date Standard method.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Implications of fixing a housing requirement via the local plan that is lower than justified has significant implications for York, and will lead to the worsening of an already severe affordability situation
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver potentially significant increase in housing requirement via future reviews.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	based on the Lichfield's 1,010 dpa OAHN and the council's housing supply, it is unlikely that the council will be able to demonstrate a 5 year housing land supply upon adoption of the local plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing requirement in Policy SS1 is increased to a minimum of 1,013 in line with the Standard method local Housing need calculation.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A review of the local plan is immediately triggered to ensure the local plan is updated in line with the standard method and framework.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent recommends that the undersupply of 512 is annualised over the first 5 years of the plan rather than over the plan period.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	Land to the west and north of ST8 Monks Cross is not considered to be necessary to keep permanently open in order to protect the primary purpose of the GB, which is to protect the historic setting and character of York.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	Whilst ST8 is supported, defining land to the west and north of ST8 within the GB is inappropriate. The land will not serve any meaningful GB function.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	A landscaped buffer could be incorporated adjacent to the Outer Ring Road, immediately adjacent to land north of ST8 to maintain a 'band of open land'
583	Redrow Homes, and private landowners of ST8 (check)	Section 03 Spatial Strategy	Site Allocation ST8	ST8 and land north and west of ST8 aligns with the Council's strategic aims of channelling development towards urban areas and promoting sustainable patterns of development.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	There is a lack of consideration of potential development put forward and the potential for an alternative boundary which allows for appropriate development to be accommodated in the longer term.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent disagrees with the council's conclusion and continue to consider that the identification of safeguarded land is appropriate.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	Outer ring road is identified in Annex 1 figure 6 as a 'main Road Approach', however no 'long distance views are interrupted by ST8 or land to the north or west.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	In relation to 'historic core views Analysis of Long distance views' ST8 and land north and west of ST8 is not crossed by any panoramic, key or general views.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	ST8 is identified in the Draft Local Plan as a 'residential Urban Extension' and yet it is proposed to extend north of Monks Cross business park and remain separate from the existing Huntington residential edge.
583	Redrow Homes, and private landowners of ST8	Section 05 Housing	Site Allocation ST8	A more sustainable option would be to connect the urban extension to Huntington.
583	Redrow Homes, and private landowners of ST8	Section 05 Housing	Site Allocation ST8	Local plan fails to make the best use of land within the Outer Ring Road and there is a missed opportunity of taking advantage of existing infrastructure.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	An appropriate approach would be to fix the Outer Ring Road as the GB boundary with fixed landscape corridors within the outer ring road, allowing for the use of remaining undeveloped non-GB land contained within the Outer Ring Road boundary to be utilised for development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	In terms of compactness, alternative GB boundary would detrimentally affect the understanding of the compact city within the original countryside context.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	In terms of landmark monuments, should views of the Minster be visible, there are opportunities through design of creating open corridors free from development to maintain any longer distant views. this has not been taken into consideration.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	In terms of landscape and setting, land to the east of ST8 is proposes as open land, whilst land to the north only offers glimpsed views from the outer ring road to the south west due to existing screening.
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	In terms of urban Sprawl, it is not considered farms north and south of North lane 'pose a risk to sprawl or ribbon development' as described in the council's analysis
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	In terms of encroachment, wider countryside north and west of ST8 is severed by the outer ring road.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
583	Redrow Homes, and private landowners of ST8	Section 03 Spatial Strategy	Site Allocation ST8	In terms of local permanence, there is scope to protect land west of ST8 in between Huntington and ST8 via existing designations such as the existing nature Conservation.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that OAHN should be increased following changes to the methodology to 1,010dpa resulting in a target of between 1,042 and 1,111spa when adding in inherited shortfall.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to an OAN of 790 and the resulting Housing Requirement - questions are raised against several aspects of the methodology in reaching this figure which they believe should be higher (See further detail in comments relating to Housing Needs Update EX/CYC/43a)
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers that a joint SHMA between Selby and York should have been prepared given that they do share a joint housing market area and are part of the same travel to work area.
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	The respondent considers that as a starting point the average lead-in times for development as set out within "the Litchfield "Start to Finish" paper should be used: 55-99 homes = 3.3 years, 100 to 499 homes=4 years, 500 to 999 homes=5 years, 1000 to 1499 homes=6.9 years, 1500 to 1999 homes = 7 years and 2000+ homes = 8.4 years.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent raises concerns over inconsistent data sources and methodologies being used across the same Housing market area (Selby 2019 SHMA and the York 2020 SHMA update), including York employing the NPPF 2012 OAHN approach while Selby uses the standard method. This has resulted in both areas identifying the lower resulting OAHN for each area.
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	The respondent states that the councils approach to lead-in times is not robust, particularly with regard to ST14 and ST15. The respondent also suggests it is unclear if any allowances for longer lead in times on larger sites have been made within the housing trajectory Evidence from Litchfield papers "Start to Finish" and "housing issues technical papers 2018 and 2019" are submitted to support this claim..
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes that in order to make appropriate provision to sustainably deliver housing in a timely manor to meet the city's full OAHN - further site allocations are required above and beyond those currently proposed in the Local Plan
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	Respondent questions suggested delivery rates of proposed allocations as not being based on robust assumptions. Argued that build out rates cannot be simplistically multiplied based on the number of house builders or delivery outlets on a site. Delivery speed is shaped by local market conditions, economic conditions, proximity to competing sites, housing market area and type and quality units. While a site of 250 homes with one outlet might deliver 40dpa, a site up to 500 homes with two outlets might only deliver 65dpa. This is evidenced by work set out by Lichfield's "start to finish" report.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns over the level of past under-delivery/shortfall given discrepancies between CYC figures and MHCLG figures, The reasons for the differences are not properly explained

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	The respondent considers gross to net ratios between 60 % and 85 % would provide a more realistic basis for the provision on open space and infrastructure requirements on sites
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	The respondent considers the proposed gross to net ratios and assumed densities set out for sites in the trajectory are ambitious, do not allow for open space requirements, and will not be achieved. In the absence of specific developer information assumptions should err on the side of caution and this is not the case in the shlaa. There is particular concern that in suburban areas 40dph will not provide adequately sized family housing.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider local plan to be sound. Not justified, positively prepared, effective, or consistent with national policy. TP1 Addendum, Issues with the methodology; inadequate justification for the inclusion of land north and north east of ST8 within the Green Belt.
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	The respondent considers that in suburban areas the default density of 35dph should be used as is more achievable and more likely to provide family homes.
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	The respondent feels the council needs to adopt a more cautious approach when seeking to include strategic allocations within the 5 year supply – it is considered that a number of these do not have a realistic prospect of delivering housing in the next 5 years

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Expand ST8 north of North lane. Exclude land north east of ST8 from the Green Belt.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests further evidence on the prospect of delivering sites within the first 5 years should be provided
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent argues that CYC may only have a 3YHLS based on a more realistic OAHN of 1,010dpa, reasonable adjustments to windfalls and the Sedgfield approach to backlog.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Designate safeguarded land, recommend that upon Adoption a review of the local plan is immediately triggered.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the detailed housing trajectory table – applying a non-implementation rate (Figure 2 of the 2021 SHLAA update) should also be included within the Local Plan as it sets out how the council housing supply has been derived.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent supports the inclusion of a 10% non-implementation rate
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	Respondent accepts windfalls should be included in the overall housing delivery trajectory but only outwith the first 5-year period as its inclusion in earlier years is likely to artificially inflate the housing delivery figures in year 3 and does not account for potential delays to build out rates.
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	Respondent suggests windfalls should only be included from year 6 of the plan (2025/26).
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	This response prepared on behalf of Developer, with their continued land interests north and north east of Monks Cross, east of Huntington. Interest north of site ST8 within the confines of the Outer Ring Road and extends beyond the Outer Ring Road north east of Site ST8. Essential that detailed Green Belt boundaries are the most appropriate long-term boundaries for the plan period, and beyond. Very little change in the City of York Local Plan. The housing number remains unchanged, and the Council's Green Belt evidence addendum has not altered the approach to allocating sites and defining the Green Belt boundaries. It is not considered that the Green Belt Addendum provides a fully justified reasoning for the resultant Green Belt boundaries.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	Respondent questions using a windfall allowance figure of 182dpa when this figure has only been achieved 4 times in 10 years
585	Taylor Wimpey UK	Section 05 Housing	H1 Housing Allocations	Respondent suggests windfall allowance should be reduced from 182dpa to 102dpa due to the changes in the definition to previously developed land to remove garden sites and the surge in conversions created by changes to permitted development rights reducing out over time as locations become less available/attractive.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent recognises that the level of delivery required to fully address affordable housing need in York is unlikely to be achieved - however considers some uplift is still necessary.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that even though the delivery required to fully address need in York is unlikely to be achievable, a further 10% uplift to the OAHN to consider affordable housing need would be appropriate and realistic given the significant need identified. The 10% offers a streamlined approach which removed judgement and debate
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns in the way in which the Council have calculated historic housing completions (shown within table 8 of the 2021 SHLAA Update) is flawed and is inflated through the inclusion of privately managed off-campus student accommodation that do not meet the varied housing needs of York's residents

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests a higher OAHN of 1,010 should be applied and this would identify a shortfall of 101dpa over 16 years. 9 creating a housing requirement figure of 1,111.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests the council should be employing the Sedgfield approach not the Liverpool method.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that given the significant level of historic under delivery, a 20% buffer should be applied to both forward requirement and under supply. The buffer does not become part of the requirement but provides a realistic prospect of achieving the planned supply through the provision of excess land to enable the requirement to be delivered.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the use of the 10 year migration trend
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Should it be determined through Examination process that the housing requirements of the Local Plan are required to be increased, land north and north east of Monks Cross in Taylor Wimpey's control could be delivered to contribute to meeting this need.

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585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the modelling of the alternative internal migration scenarios
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Council's through this Local Plan are setting 'Inner boundary' of the Green Belt that envelops the City for the first time. This is not a modification exercise that requires exceptional circumstances to be demonstrated to release land for housing that abuts the inner boundary.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Green Belt TP1 Addendum clarifies position that no exceptional circumstances required for any Green Belt boundaries as the Green Belt is not proposing to establish any new Green Belt. The York Green Belt is already established and York Local Plan is not, as a matter of general principle, seeking to establish a new Green Belt. York Local Plan is tasked with formally defining the detailed inner boundary and outstanding sections of the outer boundary of the York Green Belt for the first time
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Para. 85 of the Framework (2012) states that when defining Green Belt boundaries, local planning authorities should not include land which it is unnecessary to keep permanently open, with para. 79 stating that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Land north and north east of Monks Cross not considered to be necessary to keep permanently open in order to protect the primary purpose of the York Green Belt, which is to protect the historic setting and character of York.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Considering Green Belt purposes it is agreed that purpose 2 ('to prevent neighbouring towns merging into one another') does not apply in York, given that it doesn't have any major towns close to the general extent of the York Green Belt therefore the potential of towns merging is not applicable. Also established and agreed in the TP1 Addendum that purpose 5 ('to assist in urban regeneration, by encouraging the recycling of derelict and other urban land') is not considered a purpose of itself which assists materially in determining where any individual and detailed part of the boundary should be set (TP1 Addendum paragraph 5.8 - 5.9). This leaves 3 purposes which are relevant for determining individual Green Belt boundaries in the City of York./To check the unrestricted sprawl of large built-up areas/To assist in safeguarding the countryside from encroachment; and/ To preserve the setting and special character of historic towns.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Primary emphasis placed on purpose 4 relating to historic character and setting of York. Land north and north east of Monks Cross is undefined in Figure 3 Green Belt Appraisal on page 32 of the TP1 Addendum. The land therefore does not fall within any of the identified areas that are 'most' importance to purpose 4 of Green Belt, which in the instance of York are categorised as Strays, Green Wedges, Extensions of the Green Wedges, River corridors, Area retaining the rural setting of the City, Village Setting, and Areas preventing coalescence
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Analysis of Council's TP1 evidence commissioned by Taylor Wimpey refers to methodology described in TP1 Addendum not being a standard approach to appraising against the NPPF Green Belt purposes. A number of issues are raised with the Council's methodology and approach to defining Green Belt boundaries. The assessment does not define parcels of land and so unable to quantify how much land extending from the suburban edge should be kept open to safeguard against sprawl, encroachment etc. The TP1 Addendum update only assesses boundaries.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Para 5.32 TP1 states 'The Green Belt Appraisal and Heritage Topic Paper highlights that compactness is a key contributor to York historic character and setting , with a key feature of the main urban area's setting being that it is contained entirely within a band of open land set within the York Outer Ring Road, which offers a viewing platform of the city within its rural setting'. Not defining land north of ST8, contained within Outer Road in the Green Belt will not affect this feature. A landscaped buffer could be incorporated adjacent to the Outer Ring Road, north of North Lane to maintain a 'band of open land'. The development of ST8 will disrupt any views from the Outer Ring Road or beyond of the existing open land immediately adjacent to the

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				eastern edge of Huntington. The allocation of land north of ST8 outside the Green Belt will not harm the key compactness contributor to the historic setting and character of York.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Identification of land north of ST8 would channelling development towards urban areas and promoting sustainable patterns of development. The ST8 allocation and additional land north will form a wholly logical extension to the eastern urban edge of York, which would be contained within the Outer Ring Road. The retention of a landscaped buffer adjacent to the Outer Ring Road north of North Lane would maintain separation between the urban edge and the Outer Ring Road.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Further analysis of Council's TP1 Addendum update by Pegasus on behalf of Taylor Wimpey highlight a number of concerns with the Council's revised evidence. There are criticisms regarding the continued complexity of the Addendum information. The outcomes of the methodology are not substantively different to that presented in 2019 TP1 Addendum documentation and the effect of the 2021 TP1 Addendum revisions has made no material difference to the outcome of the Green Belt boundaries, as put forward in 2019.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are criticisms of how the Council's methodology regarding 5 criteria relates to the bearing of purpose 4 of Green Belt ('to preserve the setting and special character of historic towns'). For example, in relation to the Landmark Monuments criteria it's noted that not all views of the Minster will contribute in the same way to the understanding and significance of the historic core, with not every single view of the Minster being significant or worthy of protection or contributing towards the understanding of the historic core.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Question 2 of the Landmark Monuments criteria 'Does the land need to be kept permanently open to contribute to the understanding and significance of a building, landmark or monument?' Pegasus point out that this question has no bearing on Purpose 4 of Green Belt and refer to the purpose of Green Belt not being to protect individual buildings, landmarks or monuments.

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585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent queries methodology which seems to consider the entire built-up area of York as being the historic town, including all areas of modern development, industrial, commercial, retail etc. that encircle the historic core. Whilst not in doubt that the historic core of York could be identified as having interest commensurate with a heritage asset, respondent considers this cannot be said to cover the entire built-up area of York.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider methodology is robust in identifying Green Belt boundaries that would serve the function of purpose 4 of Green Belt.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Council maintain in the TP1 Addendum that it is not necessary to designate safeguarded land to provide permanence to the Green Belt. Taylor Wimpey disagree with the Council's conclusion and continue to consider that the identification of safeguarded land is appropriate.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers identification of Safeguarded Land is particularly important as the Local Plan will define detailed Green Belt boundaries for the first time and an appropriate and sound strategy is therefore required to enable flexibility up to and beyond the plan period. Developer consider that Safeguarded Land is required in City to provide degree of permanence to the Green Belt boundary and avoid need for future reviews. It would also provide flexibility and allow land to be brought forward quickly without a fundamental review of the whole Local Plan if allocated sites were unable to deliver the quantum of development envisaged. Particularly important when considering complex nature of some of the sites that are proposed for allocation in the Plan e.g. York Central and land to the West of Elvington Lane, as well as potential heritage issues with other sites across the City which may prevent the deliverability of some allocated sites coming forward as envisaged. Flexibility is therefore essential, with a contingency of sites required to not only provide a buffer of sites but in addition, respond to the fact that the housing requirement is a minimum target rather than a maximum figure.

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585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers given the passage of time in progressing the York Local Plan, the planned five year additional land identification to 2038 to extend beyond the 2033 plan period end date has almost passed. Already four years into the plan period, so the five year buffer is dwindling, and will be even less by the time the Plan is eventually adopted. Upon the eventual adoption of the Local Plan there will be less than 20 years of Green Belt permanence. The justification to identify safeguarded land for beyond 2038 is now even stronger.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the application of accelerated headship rates to younger cohorts in calculating the demographic figure
585	Taylor Wimpey UK	Section 05 Housing	Site Allocation ST8	Land north and north east of Monks cross, and east of Huntington in Taylor Wimpey's control could be delivered to contribute to what respondent believe to be a short fall in OAHN from Lichfield critique.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Respondent does not consider local plan to be sound as it is not justified, positively prepared, effective, or consistent with national policy. The HNU is limited in its scope because it does not review the latest evidence on market signals within the City. Nor does it revisit the affordable housing need for the city, the mix of housing required, or the needs for specific groups. The housing requirement presented fails to meet the full OAHN, which is significantly higher than the council has estimated.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Developer considers that the local plan should identify safeguarded land.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Land north east of Monks Cross beyond the Outer Ring Road would be an ideal candidate for a safeguarded designation.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Detailed analysis of Council's Tp1 Addendum update has found that there are deficiencies in approach taken. Fair consideration of alternative boundaries does not appear to have been taken into consideration.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The alternative of including land north of Monks Cross, contained within the Outer Ring Road outside of the Green Belt would result in provision of a larger developable area, located in a sustainable location, accessible to existing services and infrastructure. This would align with the Council's strategy and growth focus towards the urban area, all contained within the Outer Ring Road. Land beyond the Outer Ring Road in Taylor Wimpey's control could be designated as safeguarded land, and/or in part as a nature conservation area to lessen the recreational pressure on the nearby Strensall Common SAC.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Opportunity via the Local Plan to create a longer-term Green Belt boundary by excluding land north of ST8 from the Green Belt and defining appropriate landscape buffers and green wedges. This will result in a more appropriate and justified robust, defensible and legible Green Belt boundary.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers the HNUs evaluation of, is not as robust as the PPG ID 2a-017 requires, and has only been partially completed. The demographic baseline assessment should also have considered the High International variant produced by ONS, which is more in keeping with longer term trends, but it did not. While previously the 2016 SNPP and MYE had been approximately aligned for international migration data this is no longer the case in the latest (2019) data. This is not analysed in the 2020 HNU. The respondent hypothesises that the high international growth could be as a result of higher education users especially at the universities

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				and that this trend is likely to continue in the future and therefore these international migration figures should be used in determining the correct OAHN.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent questions using the ELR timeframes and data (2014-2031) and projecting this forward over a different time period (2019-2033/37).
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent questions the modelled job growth between 2017-19 as Nomis Job Density information for this period shows stronger growth than that factored in.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent challenges whether historic employment growth needs have already been met and that accommodation has already been provided to support that growth.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent considers that historical economic growth trends should be considered, as York has previously been successful in boosting economic growth particularly between 2000 and 2017.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent disputes the scale of market signals uplift, principally because there is no sound basis to conclude that the uplift can be reasonably expected to improve affordability, and imbalances between the demand for and supply of housing will not be addressed by providing only for the level of growth produced by the continuation of demographic trends.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers uplift resulting from affordable housing need and from market signals analysis have been conflated. These are two separate steps in the practice guidance and should not be combined in this manner.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the growth in student numbers is not properly accounted for in calculating the OAHN as the growth in the 18-23 age cohort cannot be assumed to include growth in student numbers. The projections clearly indicate that they do not adequately reflect the Universities' student growth targets. The respondent questions why the methodology employed by GL Hearn for Guilford Borough Council, has not been applied here to account for a further uplift despite University of York and York St John being clear about their plans to expand and the councils knowledge of students in the private rented sector.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns that a substantial amount of C2 student accommodation is included within the completions data between 2012 and 2017 therefore reduces the amount of shortfall calculated. An example is given of 2 off campus privately managed student accommodation sites being included in 2015 where a mixture of self-contained and student flats with shared facilities were built – the figure reported does not account for this split.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns over the level of past under-delivery/shortfall given discrepancies between CYC figures and MHCLG figures – they do not feel the explanation given for this is sufficient.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises Concerns over the level of past under-delivery given a higher OAHN (1,010dpa) should have been applied to calculate shortfall
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers that there should at least be a sensitivity testing for long term international migration trends in the HNU based on 'specific local circumstances' as per PPG ID 2a-017.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent suggests an undersupply of employment provision should be considered for the years 2017-2019 in the economic growth considerations for the OAHN (within the HNU methodology), in the same way as it has been for housing.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent Suggests that if a demographic-based housing need figure of 803dpa is used no further upward adjustment is needed in order to align employment growth. Demographic based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2 and past trends.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent proposes market signals uplift is revised form 15% to 25 % or higher given the current sm2 uplift of 25%.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent proposes the Market Signals uplift should be applied to a revised demographic starting point, not the SNPP, given that GL Hern admit the 2018-based projections are less robust for York. This would lead to a need for 836dpa
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the growth in student numbers should be factored in to the OAHN - with 1,466 dwellings over the 16-year plan period this would equate to an additional 93dpa
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests MHCLG figures be used to calculate under supply increasing necessary uplift to 153dpa
585	Taylor Wimpey UK	Whole Plan	-	Respondent does not consider document to be sound, not found to be positively prepared, effective, justified and consistent with national policy.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	TP1 Addendum Issues with methodology; inadequate justification for inclusion of land west of Copmanthorpe in the Green Belt.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Exclude land west of Copmanthorpe from the Green Belt
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Response prepared on behalf of Taylor Wimpey and their continued land interests west of Copmanthorpe which lies immediately adjacent to the western development boundary of Copmanthorpe, bound by Manor Heath to the east and Hallcroft Lane Roman Road to the north (See location plan at Appendix 1). Properties off Manor House Gardens abut the south western corner of the site. The land is currently agricultural land which is available as a suitable housing site. It is considered that the site is a suitable site for allocation in the Local Plan and should not be contained within the Green Belt.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Analysis of Council's TP1 evidence commissioned by Developer refers to methodology described in TP1 Addendum not being standard approach to appraising against NPPF Green Belt purposes. Number of issues raised with Council's methodology and resultant approach defining Green Belt boundaries. Assessment does not define parcels of land unable to quantify how much land extending from the edge of existing settlements outside the Outer Ring Road should be kept open to safe guard against sprawl, encroachment etc. The TP1 Addendum update only assesses boundaries.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Boundary 3 west of Copmanthorpe, which includes the Taylor Wimpey land, is least contentious boundary to facilitate change. Unlike land north and east of Copmanthorpe, land west of Copmanthorpe does not fall within any of the identified areas that are of 'most' importance to purpose 4 Green Belt (Historic character and Setting), which are Strays, Green Wedges, Extensions of the Green Wedges, River corridors, Area retaining the rural setting of the City, Village Setting, and Areas preventing coalescence. Land west of Copmanthorpe is not identified in a Green Corridor, has no nature conservation designations and is not within a high flood risk area (TP1 Annex 4.28).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Considering Green Belt purposes it is agreed that purpose 2 ('to prevent neighbouring towns merging into one another') does not apply in York, given that it doesn't have any major towns close to the general extent of the York Green Belt therefore the potential of towns merging is not applicable. Also established and agreed in the TP1 Addendum that purpose 5 ('to assist in urban regeneration, by encouraging the recycling of derelict and other urban land') is not considered a purpose of itself which assists materially in determining where any individual and detailed part of the boundary should be set (TP1 Addendum paragraph 5.8 - 5.9). This leaves 3 purposes which are relevant for determining individual Green Belt boundaries in the City of York./To check the unrestricted sprawl of large built-up areas/To assist in safeguarding the countryside from encroachment; and/ To preserve the setting and special character of historic towns.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Copmanthorpe- freestanding settlement situated outside, adjacent to the Outer Ring Road to south west of the City of York. Copmanthorpe is one of a number of settlements that are excluded from the Green Belt. Annex 4. Annex 4 assesses 5 boundaries that currently envelop Copmanthorpe against the 4 Green Belt purposes as established in the TP1 methodology. The site lies adjacent to Boundary 3, west of 1 and 5 in terms of retaining separation with Bishopthorpe to the east, and to Boundary 4 in preventing coalescence between Copmanthorpe and the urban area of York. In addition Boundary 1 and as referenced in Annex 1 evidence 11b.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Current western boundary of Copmanthorpe is weakest boundary, with the A64 to the north and railway to the south and east of Copmanthorpe representing much stronger, defensible boundaries. Strategic permanence Annex 4 refers to open land surrounding the village as having 'some potential for sustainable development in line with the local plan strategy' , Land west of copmanthorpe is the most appropriate area for future development, the site falls within the Council's 800m buffer access to facilities and services, i.e. it is an accessible and sustainable location for development, and does not fall within an area with any criterion contributing to the historic character and setting.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Detailed analysis of Council's TP1 Addendum update found deficiencies in the approach taken. The fair consideration of alternative boundaries does not appear to have been taken into consideration. The alternative of excluding land west of Copmanthorpe from the Green Belt would allow for the designation of suitable, deliverable development land, located in a sustainable location, accessible to existing services and infrastructure, with no harm to the historic character and setting of the City. It is considered that the site does not fulfil Green Belt purposes and its retention in the Green Belt is not the most appropriate or justified approach.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Developer considers that the Local Plan should identify safeguarded land. Land west of Copmanthorpe would be a suitable safeguarded site for longer term development.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Developer maintain land west of Copmanthorpe would form logical extension to Copmanthorpe. Considered that an alternative Green Belt boundary to Copmanthorpe should exclude land west of Copmanthorpe, immediately south of the Roman Road and west of Manor Heath from the Green Belt. Land does not fulfil Green Belt purposes. There are opportunities to create a landscaped buffer on the western boundary of the site to create a stronger western Green Belt boundary with permanence. For the western boundary of Copmanthorpe.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Emphasis placed on purpose 4 relating to the historic character and setting of York. Land west of Copmanthorpe is undefined in Figure 3 Green Belt Appraisal on page 32 of the TP1 Addendum. The land does not fall within any of identified areas that are of 'most' importance to purpose 4 of Green Belt, which are categorised as Strays, Green Wedges, Extensions of the Green Wedges, River corridors, Area retaining the rural setting of the City, Village Setting, and Areas preventing coalescence.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/59a, number of baseline maps that have been prepared as desktop exercise. Respondent is informed that Annex 1 is a starting point to identify accessibility to different parcels of land on the periphery of the urban area, and that 'they have also provided an indication of where these routes might form 'open approaches' from which views might be important in enhancing the understanding or significance of York'.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	In relation to 'Historic Core Views analysis of long distance views' (Annex 1-Fig.13a), the land west of Copmanthorpe is not crossed by any panoramic, key views identified in figure 13b, including selection of views from the Outer ring road, with the nearest key view ending at the A64/A1237 roundabout north of Copmanthorpe. The land west of Copmanthorpe is not contained within any of these city-wide views.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Land west of Copmanthorpe promoted by developers is edge settlement site. No views of the historic core from site. Ebor way runs along northern and eastern boundaries of the site, which is identified as a 'Long Distance Pedestrian Approach' on Annex 1 Figure 6. The 'open approaches' are described as 'key routes into and around the city (historic and current), where open views along these routes reveal an opportunity to view attributes of the historic city in its wider context or contribute to understanding the context to the city's landscape and setting'. The land west of Copmanthorpe in Developers control lies south of Ebor way, therefore outwith of any glimpsed views of the historic city from the Ebor Way, therefore outwith of any glimpsed views of the historic city from Ebor Way to the city to the north east.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Opportunity via the Local Plan to create a longer-term Green Belt boundary by excluding land west of Copmanthorpe from the Green Belt and defining appropriate landscape buffers on the western extent. This will result in a more appropriate and justified robust, defensible and legible Green Belt boundary.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent highlights on behalf of a developer concerns of the Council's evidence and concludes that there is justifiable evidence to consider an alternative Green Belt boundary on the Western edge of Copmanthorpe to allow for the designation of land west of Copmanthorpe for long term development purposes.
585	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Should it be determined through Examination process that the housing requirements of Local Plan are required to be increased, land west of Copmanthorpe in developers control could be delivered to contribute to meeting this need

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
590	York and North Yorkshire Chamber of Commerce	Whole Plan	-	Respondent highlighted outstanding concerns from adjoining authorities. Answers to these concerns cannot be found in the evidence base.
590	York and North Yorkshire Chamber of Commerce	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails all tests of soundness; consistency with national policy, effectiveness, justification and being positively prepared.
590	York and North Yorkshire Chamber of Commerce	Section 05 Housing	H1 Housing Allocations	The plan is not justified because elements of the evidence base are incorrect. For example, the housing supply trajectory over estimates the amount of housing in the plan period.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is not effective as it does not make adequate land provision for housing or employment needs
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is not consistent with national policy as it does not provide a permanent GB boundary; housing needs not properly catered for.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Additional strategic sites that can deliver substantial affordable housing and other benefits should be allocated in the plan to deliver the substantial Boost to housing supply sought by the NPPF.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Table 1a in PM55 presents a gross exaggeration of housing supply - particularly supply from strategic housing sites and should be revised to reflect more realistic delivery from these sites.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan should make provision for safeguarded land to ensure a permanent GB boundary.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM48, respondent objects to the proposed modification as the start date for the plan should be at point of adoption. The plan period should be reset to a date that will correspond to the adoption date of the plan. Respondent suggests April 2023 as an appropriate start date.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Plan period should be reset to a date that will correspond to the adoption date of the plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM49, respondent objects to the proposed modification. It is likely that the 5 year of the plan period will have elapsed at the time it is adopted. A review of the GB is likely after 15 years. This does not constitute a permanent GB boundary.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Plan period should be reset to a date that will correspond to the adoption date of the plan. April 2023 could be considered as an appropriate start date for the plan.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM50, respondent objects to the proposed modification. The allocations are inadequate to meet the housing needs of the city.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM52, respondent objects to the proposed modification. The modification is not necessary.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Table 1a in PM55 presents an exaggerated representation of housing supply - particularly supply from Strategic Housing sites and should be revised to reflect more realistic delivery from these sites.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM53, respondent objects to the proposed modification, The allocations are inadequate to meet the housing needs of the city.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM55, respondent objects to the proposed modification.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM56, respondent objects to the proposed modification.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	April 2023 could be considered as an appropriate start date for the plan. .
590	York and North Yorkshire Chamber of Commerce	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails all tests of soundness; consistency with national policy, effectiveness, justification and being positively prepared.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
590	York and North Yorkshire Chamber of Commerce	Whole Plan	-	The outlook and trends predicted in 2019 will have been significantly impacted by the Covid crisis. A need for flexibility and a less restrictive approach, a point which now has even more relevance as we build back from the worst economic crisis in peacetime.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document CYC/29 has been overtaken by the changed economic outlook brought about by the COVID pandemic. The document should therefore be updated to take account of these changed economic circumstances.
590	York and North Yorkshire Chamber of Commerce	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails all tests of soundness; consistency with national policy, effectiveness, justification and being positively prepared.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is not positively prepared as it makes inadequate provision for the housing needs of the city; the GB boundaries are tightly around the urban area and therefore, the permanence of the GB beyond the plan period is not guaranteed.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is not effective as it does not make adequate land provision for housing or employment needs

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is not consistent with national policy as it does not provide a permanent GB boundary; housing needs not properly catered for.
590	York and North Yorkshire Chamber of Commerce	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Table 1a in PM55 presents a gross exaggeration of housing supply - particularly supply from strategic housing sites and should be revised to reflect more realistic delivery from these sites.
594	TW Fields	Whole Plan	-	Respondent does not consider the document to be sound. The local plan fails on all four tests of soundness and with respect to CYC/43a it fails to meet the full local housing need.
594	TW Fields	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to the council's continued use of the 2018 projections despite the PPG requiring the continued use of the 2014 based household projections.
594	TW Fields	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the housing requirement is increased to reflect the most up to date standard method.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
594	TW Fields	Section 05 Housing	Site Allocation ST14	Respondent wishes to maintain their previously presented case for the expansion of the Clifton Gate site to deliver at least 1,725 homes in order to meet the city's Local Housing Needs.
594	TW Fields	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York2	No objection to the amended wording given there are a number of specific measures that the site would deliver that will reduce the need and desire for future residents to visit Strensall Common to a negligible level.
594	TW Fields	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York2	No objections, the distance of ST14 from Strensall Common, the provision of high quality publicly accessible open space and the provision of sustainable urban drainage systems will ensure there is a negligible impact from ST14 on Strensall Common.
594	TW Fields	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York2	Site ST14. Respondent does not object to the proposed main modification to Policy SS12 as this issue is something that the site can comprehensively respond to.
594	TW Fields	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst the respondent supports the principal findings of the council's updated assessment work as set out in CYC/59g, respondent maintains objection to the proposed detailed boundaries of the site allocation.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
594	TW Fields	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent maintains the objection to the council's findings in respect of their conclusions with regards to the proposed boundaries of ST14, but supports the council's assessment of the Green wedges and coalescence with Skelton in defining the boundaries of ST14 which identified the land between the two established boundaries as appropriate.
594	TW Fields	Section 05 Housing	Site Allocation ST14	Respondent maintains concerns regarding the size of the current site allocation boundary.
594	TW Fields	Section 05 Housing	Site Allocation ST14	Increase the site of the site (ST14) to increase the sustainability of the development through delivering a critical mass to support the proposed services and facilities that are required to be delivered.
594	TW Fields	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York2	The current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS12 of the local plan.
594	TW Fields	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST14. Developers believe it is more appropriate to include all of the future land uses of the Garden village within the site allocation boundary. This approach, according to the respondent, would ensure that a robust policy position is established for the development of the site at the outset, and to ensure permanence to the GB boundary over the local plan period.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 05 Housing	H1 Housing Allocations	Respondent does not consider the document to be sound due to the omission of site H34 from the emerging local plan.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to the position of the GB boundary in relation to the site and Skelton village. The site (H34) is completely enclosed by the existing and established boundaries. It is perceptibly different in character from land to the north, which is vast and open and provides extensive views.
601	Private Individual	Section 05 Housing	H1 Housing Allocations	The site has previously been assessed by the council and deemed suitable as a housing allocation within the emerging local plan and only deleted when the housing requirement was reduced.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent shows evidence of addressing the issues cited by the council; demonstrating a suitable access supporting the development of 42 dwellings and that this would not harm the Skelton Conservation Area, nor the Grade I listed Church of St Giles. The council has never previously cited any GB issues in their reason for the deletion of H34 - the council has previously been satisfied that the site does not serve any of the purposes of including land within the GB.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst the respondent believes site H34 should be included in the emerging local plan, it should at least be identified as safeguarded land in anticipation of the review.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. With respect to compactness, the site is completely obscured from view on the main approach to the city travelling southbound on the A19. The site and the north side of the village are enclosed by the various trees and established hedgerows which serve to obscure any built form from view entirely.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. The respondent agrees with the statement in Annex 4 of the TP1 Addendum 2021. "on approach to the village, there is a landscaped edge which prevents a sense of the size of the village as you pass it on the A19, as most of the built up extent is hidden from view."
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. Again, with respect to compactness, the site lies in the north western part of Skelton with the rest of the village separating the site from York. Together with the vegetation, this serves to block any views of the outskirts of York, and therefore the development of the site cannot be said to effect its 'compact' nature.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. At the time of the preferred sites local plan consultation local plan, the council did not link the alleged harm to the conservation area with the need to keep the site permanently open to serve the fourth purpose of the GB.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. Respondent disagrees with the evolved council's position with respect to the inclusion of site H34 within the GB is to retain the setting and character of the village. Skelton is a village and not a town and any impact on Skelton Hall, St Giles Church or the conservation area are irrelevant in relation to determining whether land need including. This demonstrates a serious flaw. This assertion is misleading, contradictory, and does not accurately describe the context of the site and the village.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. The site remains separated from the heritage assets by the various properties located to the north of Church lane. The site is completely enclosed and contained.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. The impact on the historic city centre, views to York and its associated landmarks are obscured by existing development and vegetation. Along the A19, views of the minster and the historic city are entirely obscured by the mature trees and hedgerow that lines the norther and western edge of Skelton, and built development.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. With respect to landscape and setting, the site lies to the north of Skelton and is separate and discrete with the wider expanse of land which surrounds York.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. With respect to urban sprawl, the site is visually and physically well contained by the mature landscape features which encloses the site from the wider open landscapes to the north and the land to the west of the A19. It is a logical infill.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H34. With respect to encroachment, the site does not have the characteristics of land that could be deemed countryside. Land to the north comprises large expansive parcels of arable farmland, and is distinctively more open, and characteristics of the countryside. the site would reinforce the existing and clearly defined boundary between the edge of the village and the land to the north which is more rural and typical of open countryside.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent suggests that the GB boundary is amended to encompass site H34. It serves no GB purpose and will assist in catering for the increase in housing requirement that is required in order to render the local plan sound.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound as the OAN calculation of the housing requirement simply does not meet the need for market and affordable housing within the city of York. Rationale within supported document overlaps with CYC/43a and CYC/56
601	Private Individual	Whole Plan	-	Respondent does not consider the document to be sound and objects to the housing requirement as it fails to meet the needs of the city.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has concerns over the method used to calculate housing need. OAN is an old approach as the standard method is the one that is prevailing.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's decision to continue to use the OAN process will almost certainly result in a significant change to their local housing need figure once the standard method is used as part of a local plan review.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inevitable transition from the OAN process to the standard method will result in an increase in the housing requirement will result in further alterations to the GB.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is inevitable that the council will have to identify additional sites for housing, once the switch from the OAN process of calculating the housing requirement to the standard method.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are a number of deficiencies in the housing needs update. The housing requirement and evidence base are not justified, and the local plan will not be effective in meeting the city's needs. It has not been positively prepared and the approach adopted does not reflect national policy.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	To make the plan sound, respondent recommends that the housing requirement is recalculated and should reflect a figure similar to that produced by using the standard method.
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. Objects the continued omission of site H34 and has the view that the revised methodology to determine GB boundaries is not sound in respect of the site.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent is unconvinced that the work undertaken by the council in respect to the methodology gives rise to GB boundaries which are justified, reasonable and ultimately sound.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does agree with the approach that because there are no towns within the York authority area, the need to assess whether land should be kept permanently open to prevent neighbouring towns from merging does not arise.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned by the use of the additional criteria to assess land against the first, third and fourth purposes of including land within the GB.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to compactness, the respondent is concerned by the need to retain the dense compact city or village form in an open or rural landscape. Just because land has not been built on does not make it important to the understanding of the special character of an area which is what the criterion suggests.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landmark monuments, the respondent finds it difficult to understand how an assessment of every heritage asset, as required under this criterion, will ensure the fourth purpose has been duly considered.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landscape and setting, the respondent finds it difficult to discern why the significance of historic gardens is considered, exemplifying a general confusion and conflation as to what is and what is not historic, and how such contributes to the setting and special character of historic towns.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is unclear as to how all three of these criteria have the potential to render the whole of the York authority area. Not all land around a settlement will be important to this purpose of including land with the GB.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to purpose 1, finds this criteria as illogical as it would mean any existing building/farmstead would need including within the GB to reduce the chance of sprawl.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to purpose 3, respondent believes it is unclear how this assessment would aid one's understanding of whether or not land needs safeguarding from encroachment or what is truly countryside as opposed to land that has been influenced by urban development.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent views the emerging local plan as not being positively prepared, the land included within the GB is not justified, it will not be effective and it is not consistent with national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent recommends that the GB boundary is amended to encompass site H34, given that it serves no GB purpose, assisting with the need for increase in housing at the same time.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound and objects to the housing requirement as it fails to meet the needs of the city.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has concerns over the method used to calculate housing need. OAN is an old approach as the standard method is the one that is prevailing.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's decision to continue to use the OAN process will almost certainly result in a significant change to their local housing need figure once the standard method is used as part of a local plan review.
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inevitable transition from the OAN process to the standard method will result in an increase in the housing requirement will result in further alterations to the GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
601	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are a number of deficiencies in the housing needs update. The housing requirement and evidence base are not justified, and the local plan will not be effective in meeting the city's needs. It has not been positively prepared and the approach adopted does not reflect national policy.
603	The Retreat York	Whole Plan	-	Respondent does not consider document to be sound
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent (Savills (UK) Limited on behalf of The Retreat). They have previously set out during Phase I Hearings (Examination Ref. EX/HS/M3/Prin/1) why they considered there to be serious deficiencies in the City of York Council evidence base where it relates to defining the detailed Green Belt boundaries. Their previous Hearing Statement set out in detail where these deficiencies lie. They do not consider that the evidence base contains sufficient assessment of land around York against the five Green Belt purposes as defined by the NPPF.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Representations seek to provide a proper assessment of the land at The Retreat against the five Green Belt purposes which, irrespective of the Councils additional work referred to above, has never been undertaken before in sufficient detail. This Representation concludes that an alternative Green Belt boundary should be adopted. Such an approach would remove respondents objection to this Local Plan process.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent includes Landscape Appraisal and Assessment of Openness (Prepared by the landscape Agency)-October 2020, it details the proposed amendments within the Green Belt Inner Boundaries. Notably, it proposes an amendment at The Retreat to exclude the main building from the proposed Green Belt. This is detailed at Section 7, Boundary 16, PM 89, it is supported in principle, alongside the additional evidence provided however, respondent consider further modifications are required in order to make the draft Plan sound. The proposed amendments to the draft Green Belt boundary in this location does not go far enough.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent are seeking based on the evidence put forward in these Representations, changes to the proposed Green Belt boundary to exclude land at The Retreat altogether. The revised proposed Green Belt boundary shown on respondents map in Appendix 5.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Should Inspectors not consider this proposed change appropriate, then an alternative proposed Green Belt boundary modification is shown on the respondents map in their Appendix 6. The Inspectors will note that with this proposed change, Northern portion of the site with the majority of buildings would remain outside the Green Belt, but The Retreat land to the South would form part of the Green Belt. This would also be consistent with the Green Wedge designation. The Green Wedge designation and all the land use, conservation and heritage designations identified above would remain unaltered.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Officers and Inspectors requested to note that property known as Lamel Beeches is situated to north east of The Retreat ownership. It is within currently proposed Green Belt boundary but outside of the Green Wedge. If Inspectors are minded to modify proposed Green Belt inner boundary in a way that these Representations are seeking, then there may be merit in also removing this property from the proposed Green Belt. However, respondents stress this is outside the scope of the interests these Representations represent. Officers and the Inspectors are invited to undertake a detailed site visit to witness the features and situation on the ground. If necessary, access arrangements can be made via Savills.
603	The Retreat York	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent object to draft Local Plan on the basis proposed detailed Green Belt boundaries have not been adequately assessed against the five Green Belt purposes. This exercise has recently been attempted for the first time as part of the Local Plan Proposed Modifications and Evidence Base Consultation which is the subject of these Representations. This exercise had not been undertaken as part of the preparation of the Local Plan prior to the previous Phase I Examination Hearings which took place in December 2019.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
603	The Retreat York	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	These representations and subsequent Examination represent the opportunity for there to be a critical assessment of the exercise conducted by CYC in drawing up detailed Green Belt boundaries. Such an exercise should proceed on the basis of a robust analysis against the five Green Belt purposes set out at paragraph 80 of the NPPF. Respondents contend that the assessment conducted by CYC is insufficient. In their Statement 5 original Hearing they drew attention to the deficiencies in the CYC evidence base and the approach taken to setting Green Belt boundaries.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent reviewed the approach undertaken by CYC in an attempt to define York's Green Belt Addendum: Annex 3: Inner Boundaries (Part 3: Sections 7-8) [EX_CYC-59e]. Notably, Section 7 Boundary 16 of this document. Respondent have also undertaken their own Green Belt assessment against the five purposes below. This exercise is limited in its scope to the land holdings of The Retreat and the immediate surrounding areas. This part of the Representations needs to be read in conjunction with the Landscape Appraisal and Assessment of Openness prepared by the Landscape Agency and is contained within their own Appendix 3.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The NPPF requires the Green Belt serves 5 purposes. These are identified below along with respondents own assessment against these criteria. //Purpose 1 - to check the unrestricted sprawl of large built-up areas.// It's recognised that in many instances around York it's necessary to include land within the Green Belt in order to check unrestricted sprawl. However, this does not apply to the Retreat. The North of the site is already occupied by buildings and is not 'open' land in a Green Belt context. The existing buildings on site include the Grade II* main building, other listed buildings, non listed buildings, a Scheduled Ancient Monument and other structures. As is appropriate, very restrictive planning controls are associated with these heritage assets and designations. These heritage related designations should not be confused with Green Belt purposes. The land at Retreat does not fulfil Purpose 1 because it is already developed with buildings, other structures and curtilage land. It is part of the urban fabric of York. The critical question is if the Green Belt designation were removed from the Retreat site, would this facilitate unrestricted sprawl in this part of York. Answer is no. The site is already previously developed land and as is demonstrated in evidence below is not open and is of a typical density for this part of York. It should already be considered part of the urban fabric of York and it reads as such. In this regard alone, the inner Green Belt boundary is proposed to be incorrectly set. The Green Belt boundary should be set beyond The Retreat land. In addition to the above, the restrictive heritage designations on site mean that very little change can take place on the site in any event. In summary, the City of York will not 'sprawl' because the site is already developed

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				and levels of development on site are unlikely to materially alter because of the heritage designations.
603	The Retreat York	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Purpose 2 - to prevent neighbouring towns merging into one another.// York does not have any nearby major settlements which could merge. Draft allocated Green Belt land at the Retreat is not fulfilling any role under this purpose. This view aligns with that of CYC as detailed in the updated Topic Paper 1: Approach to defining Green Belt Addendum [EX_CYC_59].
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Purpose 3 - to assist in safeguarding the countryside from encroachment.// The land at the Retreat does not meet Purpose 3 because it is not countryside. It is a previously developed site with formal registered walled gardens. The land it is completely different in terms of character, appearance and openness when compared to the open countryside further to the South which is also subject to a Green Wedge designation. Draft allocated Green Belt land at The Retreat is not fulfilling any role under this purpose.
603	The Retreat York	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Purpose 4 - to preserve the setting and special character of historic towns.// See Paragraph below. //Purpose 5 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.// In the context of York there is very little derelict land. The central sites which are to be regenerated and recycled are well known, complex and proposals are being brought forward. The removal of The Retreat from the Green Belt will have no implications for these central sites. Purpose 5 is not relevant in this context. The updated Topic Paper 1: Approach to defining Green Belt Addendum [EX_CYC_59] details that this purpose is considered to be achieved through the overall effect of the York Green Belt, rather than through the identification of particular parcels of land which must be kept permanently open. This view is supported.

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603	The Retreat York	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Assessment Under Purpose 4 - to preserve the setting and special character of historic towns.// The updated TP 1: Approach to defining Green Belt Addendum [EX/CYC/59] outlines that CYC place a primary emphasis on the fourth NPPF Green Belt purpose and recognises this fourth purpose as the most appropriate in the context of York. This view is supported in principle however it's considered that this has not been adequately assessed in the evidence provided by CYC. In order to thoroughly assess land at The Retreat against purpose 4, the following further evidence is presented in the Landscape Appraisal and Assessment of Openness (October 2020) prepared by the Landscape Agency; and Commentary on CYC Density Assessment.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Landscape Appraisal and Assessment of Openness prepared by the Landscape Agency concludes that the site has a low contribution to the overall openness of Green Belt. Respondent argues that the land at The Retreat does not perform a Green Belt function.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Landscape Appraisal and Assessment of Openness prepared by the Landscape Agency//The site's contribution to the openness of the Green Belt is limited by existing built form of The Retreat, the strong line of existing mature trees and the high brick walls that define the site's historic boundary. The findings of the Visual Appraisal conclude that : Within south of The Retreat site is a large area of grassland including a cricket pitch which results in a moderate level of openness. However, presence of the high brick boundary walls and mature trees along the boundaries of The Retreat prevent these open areas contributing to the perceived openness of the surrounding Stray to the south. There are limited long range views into the site from Walmgate Stray and a lack of intervisibility with the wider landscape. For this reason, the levels of openness associated with Walmgate Stray are not replicated within the site.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Landscape Appraisal and Assessment of Openness prepared by the Landscape Agency//The site's contribution to the openness of the Green Belt is limited by existing built form of The Retreat, the strong line of existing mature trees and the high brick walls that define the site's historic boundary. The findings of the Visual Appraisal conclude that : Much of the surrounding landscape of Walmgate Stray to the south has strong sense of openness with a large expanse of open grassland with far reaching views. However, the northern "fingers" of the stray, that extend either side of The Retreat to the east and west, are constrained either side by built development and the presence of dense mature trees and vegetation. This, combined with the

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				narrowed width of these "fingers" significantly reduces the perceived openness that is experienced compared to the expansive areas of the Stray to the south.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Landscape Appraisal and Assessment of Openness prepared by the Landscape Agency//The site's contribution to the openness of the Green Belt is limited by existing built form of The Retreat, the strong line of existing mature trees and the high brick walls that define the site's historic boundary. The findings of the Visual Appraisal conclude that : The Assessment concludes the site has a low contribution to the overall openness of the Green Belt.
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	<p>The Retreat is a previously developed site with number of significant historical and conservation designations. These designations do not mean it should automatically be within the Green Belt. The draft Local Plan contains a density assessment. Respondent did not comment on this assessment in their Phase I Hearing Statement and do so briefly here. There is not much detail, but in essence the exercise breaks York down into 250 square meter grids and then seeks to identify the urban area and then those areas with a density of 33 or more structures per 250 sqm and those which are less than 33 structures per 250 sqm. We believe this approach to be incorrect for the following reasons : //i. It is not clear how the 250 square meter grid has been positioned on York. The positioning of each grid will have implications for the density within it. Clearly a grid square on the urban fringe could include a significant area of non developed land, then by definition the overall density within that square would be reduced even if the developed area within that same grid square was actually very dense. This cannot be right; // ii. Respondent do not know what the threshold of 33 structures is based on; // iii. The number of structures is the incorrect measurement. A significant building such as The Retreat Main Building allows for significant dense forms of development/use, but it only counts as one structure. This cannot be right; and// iv. In many ways the higher the number of structures, the greater the openness because there will be gaps and views between buildings. Or to put it another way, a smaller number of larger structures will result in a less open townscape / landscape. Again, this points to the deficiencies in assessing Green Belt openness on the basis of densities.</p>

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
603	The Retreat York	Section 03 Spatial Strategy	Policies Map (Green Belt)	In conclusion, when land at The Retreat is assessed against the five Green Belt purposes, it is clear that it does not perform a Green Belt function. The proposed designation of The Retreat within Green Belt has been based on a confused assessment process which has utilised the restrictive heritage and conservation designations as being the basis for a Green Belt designation. This is clearly incorrect. On the basis of the evidence contained within these Representations respondents therefore respectfully request the Council and appointed Inspectors to set the inner Green Belt boundary, insofar as it is relevant to The Retreat, in accordance with the Modifications Sought within this Representation.
603	The Retreat York	Whole Plan	-	Respondent does not consider document to be sound. Justification given in their attached document.
603	The Retreat York	Whole Plan	-	Respondent does not consider document to be sound. Justification given in there attached document.
604	L&Q Estates	Whole Plan	-	Respondent does not consider document to be sound, not found to be positively prepared, effective, justified and consistent with national policy.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Council proposing to modify local plan and continued intention to meet an OAN for 790 dwellings per annum, this having been originally calculated- in earlier iteration of HNU- over the period from 2012 to 2037. With latest HNU suggesting that 'housing need in the city has not changed materially since', the Council continues to reference this figure, proposing a slightly higher requirement for 822 dpa, described as allowing for undersupply prior to 2017 but surprisingly covering a period only to 2033 rather than aligning with the original endpoint of

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				2037. The latter approach would appear to be more appropriate, where the relevant National Planning Policy Framework (NPPF), clearly expects local plans to look at least 15 years ahead and this requirement has since been strengthened.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Underlying OAN of 790 dpa is apparently intended to satisfy requirement of applicable Planning Practice Guidance (PPG) and show the housing needed to grow the labour force and support the creation of 650 additional jobs each year. While respondent fully agrees that this is a necessary step in the process, they have previously expressed concerns around the legitimacy of this job growth target, where it originated from an increasingly dated baseline forecast that was produced in May 2015 and last adjusted in July 2016. Respondent acknowledge that council has since commissioned new evidence from Oxford Economics (OE)- finalised in December 2019- which it believes to have 'corroborated' the job growth target, but its shortcomings mean that respondents conclude that the council's evidence OAN and the derived housing requirement are unsound. This technical note sets out their concerns around the evidential basis for the job target in this context. It is important in the context of the issue raised here, to accept that the council's approach is such that any increase in the job growth target would increase the level of housing need to be met by the local plan, and where this is a critical issue respondent believe that it fully warrants discussion at a further hearing session.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	OE report does not appear to explicitly endorse target of 650 jobs per annum, and Council is assumed to have simply taken comfort from the fact that it presents a more up-to-date forecast which appears to downgrade the baseline level of employment growth relative to the 2015 forecast on which the target was originally based. OE indicate that this original forecast envisaged the creation of circa 576 new jobs every year in York between 2017 and 2031, but confirm that a more recent version of its forecasts- dated November 2019- foresaw only 299 new jobs per annum over the same period, some 13% fewer.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Allows the council to frame its job growth target as increasingly ambitious, and thus not requiring further adjustments to account for additional growth, this is not necessarily the case when the underlying reasons for the reduction are explained and fully understood.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	OE report makes clear, for example, that this lower forecast negatively influenced by an assumption of 'lower population growth'. This is not entirely logical in a plan-making context where the council has the means, through its emerging local plan, to plan for the population growth that is needed to realise its economic ambitions, which therefore should not be constrained- as in the OE forecast- by the size of the population.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Forecast apparently is constrained by 'lower population growth' factor is concerning where OE are understood to have made independent and untested judgement on future site of York's population, assuming it would be smaller in 2031 than implied even by the official trend-based projections that were available at the time of reporting. Respondent has previously highlighted how these same 2016-based projections imply an historically low rate of population growth for York, having assumed an almost unprecedentedly small net inflow of people from elsewhere, so they naturally question the realism of assuming that the city's population will grow at an even slower rate.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Cautious- and arguably unrepresentative- assumptions are embedded in even the most positive variant of more recently published 2018-based projections, presented at Table 5 of HNU and implying a need for circa 670 dpa before any adjustment for market signals. This variant is technically based on migration trends over 10-years to 2018 but assumes, on average, a lower rate of population growth than has been recorded in 24 of the last 29 years, and a smaller net inflow of migrant than has been experienced in any year since at least 2001. Respondents are concerned by HNU's failure to scrutinise or even identify these critical assumptions, which threaten to underestimate the future need for housing in York and therefore undermine its conclusion that the OAN of 790 dpa remains valid.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	OE's conservative assumption on size of the population is believed to have flowed from its overarching view that there will be 'a sharper slowdown in migration at a UK level' than assumed by the ONS. However, where the latter's projections already envisage a substantial 40% reduction- and technically form the basis of Local Plans throughout the country- there is considered to be no justification for making a more extreme assumption for York alone.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Negative assumptions ultimately produce a relatively pessimistic outlook for York in terms of job growth. Updated OE forecast envisages an average of around 499 new jobs per annum from 2017 onwards, but this is less than half the 1,106 jobs created annually on average over the preceding 5 years according to the Business register and employment survey (BRES).
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes that the Council should elevate its job growth target, to proactively support a continuation of the positive trend that has been seen in recent years. It should then proceed to reassess level of housing provision needed to support such continuation, in order to avert the risk of growth being actively constrained by a lack of available labour. Persisting with current approach would not be justified in this context, nor effective in sustaining the recent economic success of York, which raises severe doubt around whether the Local Plan has been positively prepared and is thus sound. Such fundamental questions, relating to issues that should be closely scrutinised in the context of the applicable NPPF, are considered to require discussion at a further hearing session.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Council is understood to still be aiming to meet a need for 790 dpa between 2012-2037, through housing requirement for 2017 onwards that accounts for prior undersupply but surprisingly runs only to 2033.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Intended to provide the housing needed to support 650 jobs per year, an increasingly dated target that remains a concern despite its supported corroboration through new evidence from OE that was produced in late 2019.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Council believed taken comfort from this report's downgrading of the baseline employment forecasts from which the target was originally derived, but is largely down to an in-built population constraint within the OE forecast that is not justified or appreciative of the Local Plan's ability to accommodate whatever population growth is necessary to realise the city's economic ambitions.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Revised forecasts assume that population will grow even slower than implied by official trend-based projections, which themselves appear extremely conservative in the context of historic trends having assumed that there will be an almost unprecedentedly small net inflow of people from elsewhere into York.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Such negative population growth predictions produce a relatively pessimistic forecast for York, implying that the rate of job growth from 2017 onwards will more than halve compared to the positive trend recorded over the previous 5-years. The council's target appears similarly unambitious within this context.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Council's approach is not considered to be justified in light of the above, and nor will it be effective in sustaining the recent economic success of York. This raises severe doubt around whether the Local Plan has been positively prepared and can thus be found sound. Such fundamental issues are considered to warrant discussion at a further hearing session.
604	L&Q Estates	Whole Plan	-	Respondent is concerned as to the length of time it has taken the Council to respond to concerns raised by the inspectors and the fact that a large amount of the evidence base is now becoming outdated.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Whole Plan	-	Serious concerns over the modifications currently proposed, the evidence base and the overall soundness of the plan which will impact upon the timetable and prolong the continued failure to plan for the development needs of the city of York.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Evidence base contains significant flaws which result in implication for housing needs. Flaws relate to the assumptions made in relation to job targets, and the use of 2018-based household projections.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Whilst affordability issues have been identified they fail to be addressed in any significant detail, the OAN of 790dpa is therefore unjustified, ineffective and inconsistent with national planning policy. Respondents concerns previously raised in relation to the OAN requirement being insufficient still stand.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Plan continues to rely on insufficient appropriate and sustainable housing land to meet its requirement: Overreliance on a number of a key large and/or complex sites, over optimistic and unsupported assumptions over both timing, phasing, and number of dwellings to be delivered. Indicative densities are too high and not sympathetic to the characteristics of York, its surrounds given the existence of several heritage and archaeological related constraints. In addition, it provides an unachievable target, based on unrealistic yield per hectare assumptions which will (if delivered at, a local level) is likely to result in producing poor quality developments, alack of new housing choice and in particular a lack of family housing for York residents.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent view remains that based on available evidence, the plan should provide for a minimum of 1,069 new dwellings per annum.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The proposed modifications to the plan in relation to Policy SS1 are therefore considered to be unsound.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's negative approach to meeting the development needs of York is reflected in the approach taken toward the Green Belt.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	TP1 Approach to defining York's Green Belt Addendum January 2021 is the latest in a long line of green belt review documents. It highlights again the flawed process that seeks to retrospectively justify proposed Green Belt boundaries.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The proposed Green Belt boundaries are unsound as they would unreasonably restrict more sustainable development opportunities for the necessary growth of York.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inner boundary as proposed has been drawn too tightly meaning that there is no flexibility to enable the release of land to meet the needs for housing development during the plan period and beyond.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondents consider PMs fail to revisit the spatial strategy for housing or to reconsider sustainable urban extensions as an appropriate alternative. Respondent considers it critical that here should be a more mature approach adopted to manage growth in York which should be established at the outset of adoption of the plan, rather than being left to windfall development.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The draft plan respondent considers unsound and in conflict with NPPF as no safeguarded land is proposed to help meet 'Longer term needs stretching well beyond the plan period'.
604	L&Q Estates	Whole Plan	-	Respondent considers flaws within the evidence base which results in the proposed PMs being unjustified and unsound.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Consider the proposed OAN to underestimate the true levels of extreme housing need that prevail across within the city.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Tightly drawn green belt boundaries which have been inconsistently applied and a lack of appropriate housing land which will prevent established needs (particularly the acute affordable housing needs) being met within the plan period and beyond.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent continue to consider that the council has chosen an unreasonably low OAN to help justify the tightly drawn inner Green Belt boundaries that were originally proposed as part of much earlier reiterations of the local plan.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the council are seeking to further retrofit their evidence base to justify these Green Belt boundaries.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Despite new evidence (PM50, PM53, PM54) respondent continue to consider Policy SS1 to be unsound and not positively prepared, effective, or consistent with national policy for the reasons set below which reiterates their previous representation
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent object to the housing requirements being set at 882 dwellings over the plan period to 2023/33 which the Council state in PM 54 includes 'an allowance for a shortfall in housing provision from the period 2021 to 2017' based on an objectively assessed housing need of 790 dpa. As per representations previously submitted by respondents, they consider the OAN should be higher and in the region of 1,069 dpa. They consider that the points raised in the Turley OAN Critique report previously submitted as part of representations to the proposed Modifications (June 2019) are still relevant. The conclusions of this report concur with the Planning for Right

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				Homes Publication Data spreadsheet which identifies a figure of 1,070 dpa for York, a significant increase from 790 dpa.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	June 2021 Turley Critique of Housing Needs, sets out the basis of respondents objections tot the continued use of the 760 OAN based on the Council's continued use of the 650 jobs per annum target which appears to be linked to shortcomings within the evidence base in relation to OE (December 2019) (EX/CYC/29) and also the GL Hearn (September 2020) (EX/CYC/43a) which appears to stem from the untested judgements that have been made in relation to population growth without both reports with no attempt to analyse the key factors which will influence housing need.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The use of 2018-based household projections within the GL Hearn (EX/CYC/43a) report which has been used to support the OAN raises concern. The PPG sets out a clear statement from Government that the 2016 and 2018 based projections should not be used or assessing housing needs and the 2014-based projections are more appropriate.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent have concerns that the evidence base (EX/CYC/36) provided by the council in relation to affordable housing continues to show that affordable housing need will not be met. They consider it well documented and highlighted in the hearing sessions in December 2019 that the city is suffering from an acute affordable housing need following years of under provision. With a supply of only 38.6% of the affordable housing need with historical completions of less than 10% of the total completions highlighted within the Affordable Housing Note the demonstrates a serious flaw within the Council's approach to housing need and affordability. It shows a clear lack of understanding and willingness on the council's behalf to acknowledge the seriousness of the issue and look for possible solutions in the form of an uplift to the housing requirement to aid the delivery of affordable homes.

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604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the Council's paper (EX/CYC/32) to show a significant difference in the two forms of data which raises questions over the validity of the use such data in the formation of the wider evidence base and subsequent strategy for delivering sustainable growth in York. The lack of a robust approach to address the issues raised respondent believes highlights how the plan is unsound as it has not been positively prepared, nor is it justified, effective or consistent with the NPPF core principles at paragraph 17, bullet point 3.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers points raised in the developers OAN critique report submitted as part of representation for PM June 2019 are still relevant. The conclusions of this report concur with Planning for the Right Homes Publication Data spreadsheet which identifies a figure of 1,070 dpa for York, a significant increase from 790 dpa.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the evidence base, proposed housing requirement and associated modifications at PM 50-54 are not justified or consistent with the NPPF. They consider that this could be resolved through proposed housing requirement based on a minimum OAN of 1,069 dpa
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent continues to have concerns in relation to the spatial strategy and the significant reliance on several key large/complex sites which make up 60% of the housing supply and the over-optimistic and unsupported assumptions over timing and number dwellings.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council should have a strategy that provides a broader range of sites for a range of needs including affordable housing and family housing to ensure delivery can be sustained over the plan period. Reliance on large strategic sites which require infrastructure to enable delivery adds risk to the delivery of housing in the early period of the plan.

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604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has fundamental concerns that the green belt work undertaken by the council in response to inspectors concerns is yet another attempt to retrofit key evidence. Respondent believe that the fact EX/CYC/59 wasn't submitted until 15th January 2020, 12 months after the first set of hearing sessions closed in December 2019 raises serious concerns. Also that this document was submitted without the accompanying 5 annexes also raises concerns. Respondent asks, how can a document be complete and draw robust conclusions if the supporting annexes are not finished? They believe the fact that the annexes were drip fed over a number of months to also raise concern. Highlighting how disjointed the preparation of this further evidence has been an clear lack of coherent approach.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Inspectors expressed concern about the methodology used by the council to define the green belt, which respondent agree with. The latest information produced largely seeks to justify the green belt boundaries as previously defined stripping out the 'shapers' which aren't relevant and concerns in relation to the green belt purposes. This again highlights the retrofitting nature of the exercise the council has undertaken rather than addressing the issues through a comprehensive and robust assessment of the green belt and then looking to define appropriate boundaries.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers their comments put forward as part of previous representation to Reg.19 March 2018 and PMs Reg.19 July 2019 and Housing statement Matters 1,2,3 November 2019, to all still stand. Respondents also attach CSA Environmental (CSAE)-Addendum to Landscape Overview, with the points raised in it still valid.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent states that despite January 2021 addendum to TP1 Approach to green belt, they continue to consider that the green belt evidence base is merely a loose collection of documents emerging over an 18-year period, during which regional and national policy have undergone changes. TP1 Approach to green belt has been amended/updated via various addendums following concerns raised by the local plan inspectors. Continually adding addendums to address comments is not a satisfactory way of undertaking a green belt assessment. A comprehensive green belt assessment should be undertaken rather than continually trying to retrofit an evidence base to justify green belt boundaries. This should be in the form of a green belt review which clearly identifies land parcels and assesses their performance against green belt purposes, and other sustainability factors whilst reviewing green belt boundaries.

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604	L&Q Estates	Section 03 Spatial Strategy	Policies Map (Green Belt)	TP1 Addendum Annex 3 assesses and justifies the proposed Inner edge of the green belt across 3 parts. EX/CYC/59c relates to assessment of the proposed inner green belt edge to the east of the SHLAA Site 8171. Respondent note that there have been no changes to the proposed boundaries in this location in comparison to the March 2019 document EX/CYC/18d and therefore refer to the key points of CSA Environmental (CSAE)- Addendum to landscape overview enclosed at appendix 3 of the PM (Reg. 19 representation July 2019) which still stand. Key points listed in further representations.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Assessment continues to fail to objectively consider other potential boundaries. As such, assessment is subjective rather than objective. Of particular relevance to these representations is the CSAE report comment that the A1237 and the built development of large-scale housing at Acomb have 'severed any connection between this land parcel and the historic centre of York' (i.e. referring to the land between the YORR and current urban edge, including SHLAA Site 871). As such, 'there are no key Historic core views'.
604	L&Q Estates	Section 03 Spatial Strategy	Policies Map (Green Belt)	CSAE refutes the CYC attempted justifications for the green belt boundary at this point. As per previous representations in respect of Site 871 the CSAE Addendum report maintains: 'The adjacent land parcel does have an open character, however the existing edge is poorly assimilated and the A1237 would provide a much more robust alternative boundary. Planned expansion could maintain a buffer to the ring road and provide a much better edge to York.
604	L&Q Estates	Section 03 Spatial Strategy	Policies Map (Green Belt)	CSAE in respect to permanence states: 'The assessment notes that the proposed boundary follows an historic field boundary which forms a distinct edge between the urban area and more open farmland. In fact, this boundary largely follows the rear gardens of housing at the edge of York. This does not meet the criteria of a robust manmade or natural feature. The A1237 would provide a much more logical and permanent edge to the green belt at this point, however this does not appear to have been considered'.
604	L&Q Estates	Section 05 Housing	H1 Housing Allocations	Respondent considers that Site 871 would be an appropriate and sustainable urban extension. It represents a missed opportunity for the council to identify more housing land to meet a significant uplifted OAHN to address the issues identified as part of respondents representation. It would perform well under NPPF para. 139(f) in respect of physical feature that is recognisable and permanent. Furthermore, this would be a simple and straightforward continuation of the proposed green belt boundary to the north, between the Boroughbridge Road Roundabout and where the A1237 crosses the river ouse.

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604	L&Q Estates	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent notes that there has been no change in proposed modification 41 for the green belt to 'wash over' Knapton. Respondents remain of the view that the suggested alternative green belt boundary shown in the vision framework submitted as part of previous representations and again PM (Reg.19, July 2019) in Appendix 2 is more appropriate and sustainable.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Significant part of PMs consultation relates to additional evidence in the form of Addendum TP1- Approach to Defining York's Green Belt Addendum- January 2021 plus appendices. Whilst they do not have any specific comments in respect of PM72-PM4101 in themselves, they object to all of them in the context of the flaws within the Green Belt evidence base as it stands. The review of green belt boundaries should e comprehensive and should relate to the development needs during the plan period and the longer-term development needs beyond the plan period rather than what feels like ad hoc changes to the boundaries.
604	L&Q Estates	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst the PMs the subject of this consultation do not include any amendments to the policies and evidence base behind strategic sites, within the general extent of green belt, respondent draw attention to the fact that previous representations for L&Q Gallagher have raised issues in respect of the selection and justification for the following strategic sites: ST7- East of Metcalfe lane, ST8- Land north of Monks Cross, ST9- Land North Of Haxby, ST14- Land North of Clifton Moor, ST15- Land to the West of Elvington Road.
604	L&Q Estates	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents comments raised within previous representations still stand and they refer to the commentary set out within pages 11-13 of the CSAE Addendum report (Appendix 3 of PM, Reg.19, July 2019) the assessment of these sites under TP1 Addendum Annex 5- Development of sites in the Green Belt raises a number of concerns including inconsistencies in the Assessments of these sites.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Proposed Modifications do nothing to help resolve the issues highlighted early in rep. There is significant pent-up housing demand and affordable housing need across the city.

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604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In the absence of a full review of the general extent of the green belt since its introduction and in view of NPPF advice para. 85, the council should be formally identifying safeguarded land to meet longer term development needs stretching well beyond the plan period, and to ensure that the adopted green belt boundaries will not need to be altered at the end of the development plan period. Whilst respondent recognise that the PM49 seeks to provide 'further development land to 2038' this is not sufficient as it does not look beyond the plan period and falls well short of the NPPF para. 85 requirement: '...meet longer-term development needs stretching well beyond the plan period.'
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers more land should be released from the green belt including the inner green belt boundary to enable suitable land to be allocated for housing as sustainable urban extensions to meet an increased OAN and also safeguarded land for future development needs beyond 2038.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondents remain of the view that the proposed modifications fail to meet the fundamental issues of soundness arising from the interlinked OAN, strategic housing growth and green belt review matters set out within these and also previous representations.
604	L&Q Estates	Whole Plan	-	Respondent considers their representation to explain why the PMs and supporting evidence continue to fail to make the local plan sound and link to points raised in their earlier representations. In particular they highlight that the plan still continues to fail to meet the necessary test of soundness and the NPPF par.157 requirement to: '...plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this framework...'
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	As highlighted in these and respondents previous representations, the most significant and on-going concerns remain: //the proposed even lower annual housing provision with an OAN of 790//tightly drawn green belt boundaries//lack of robust and comprehensive green belt review or justification// insufficiency of housing land allocation.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
604	L&Q Estates	Whole Plan	-	Theses issues: the proposed even lower annual housing provision with an OAN of 790, tightly drawn green belt boundaries; lack of robust and comprehensive green belt review or justification; and insufficiency of housing land allocation, will stifle the growth of the city to unreasonably low levels, fails to facilitate delivery of much needed housing and exacerbate the existing significant affordability issues further.
604	L&Q Estates	Whole Plan	-	Respondent considers that the evidence base is flawed, and the subsequent proposed modifications will achieve nothing towards resolving/recognising the following issues that go directly to the heart of the plan soundness. They reiterate the issues that they have previously raised in earlier representations which they consider still stand and highlight the point that the evidence base and subsequent PM have done nothing to assist in moving the plan forwards causing only further delays.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Plan should provide for a minimum of 1,069 dpa.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Even founded on proposed housing figure 790 dpa the plan proposes insufficient housing land in appropriate and sustainable locations
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The spatial strategy remains too heavily reliant upon (1) a number of large key and/or complex sites and over optimistic and (2) unsupported assumptions over both timing and number of dwellings to be delivered.

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604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The PMs fail to include the reconsideration of sustainable urban extensions to make up the projected shortfall in supply and improve future range and choice.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The draft plan remains unsound and in conflict with the NPPF as: //the PMSs do not include measures to address the above issues// the green belt review update fails to accommodate safeguarded land to help meet 'longer term needs stretching well beyond the plan period'.
604	L&Q Estates	Section 03 Spatial Strategy	Policies Map (Green Belt)	The proposed modifications under PM41 don't acknowledge that the A1237 to the West of Acomb would form a logical, permanent and strong green belt boundary and a well-defined edge to the built part of the city at this point.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent maintain the view that additional land should be released from the green belt for housing for the reasons set out within these and previous representations- to assist in meeting a higher level of housing need which is justified given the flaws that have been highlighted earlier. Respondent consider that Land at North Field, York SHLAA could be released from the green belt to assist with this and at the very least designated as safeguarded land for future development.
604	L&Q Estates	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent maintain the view that additional land should be released from the green belt for housing for the reasons set out within these and previous representations- to assist in meeting a higher level of housing need which is justified given the flaws that have been highlighted earlier. Respondent consider that Land at North Field, York SHLAA could be released from the green belt to assist with this and at the very least designated as safeguarded land for future development.

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607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. Objects to modifications PM49, PM50, PM53, PM54 and PM55. Council's proposed objectively assessed housing need is not based on a robust assessment which is compliant with the framework.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Council's approach to identifying an assessed need of 790 dpa in the HNU 2020 is flawed. There are a number of significant deficiencies in the HNU which means that it is not soundly based.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM49-55 are not positively prepared, effective or consistent with national policy. Enduring Green Belt boundaries need to be defined and the potential period between further Local Plan Reviews means that land should be removed from the Green Belt to meet future needs where they may be identified.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM49-55 are not justified. No clear evidence to demonstrate why safeguarded land has not been identified to meet need beyond the plan period. Without inclusion of safeguarded land as a minimum, the plan is not sound and should not be adopted.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Council's submitted evidence does not robustly demonstrate sufficient housing delivery during the plan period and beyond and there are significant flaws in the Council's assumptions on future windfalls.

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607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Following comment relates to PM49-PM55 - the change is well intended but the plan fails to deliver permanence to the Green belt and deliver sufficient land for housing for the plan period.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Review the Green belt assessment to identify which parcels of land could be released from the Green Belt to act as allocations and safeguarded land. Make policy provision for safeguarded land and identify safeguarded land on the local plan proposals map.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Council should revisit their housing requirement and also seek to identify additional land to meet the housing needs of the district.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to PM101. The proposed inner Green Belt boundary around Strensall has not been properly assessed and the changes fail to release land at Brecks lane, Strensall from the Green belt.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to PM101, this modification is not positively prepared as it does not consider the suitability of alternative boundaries which would provide a more appropriate Green Belt Boundary around Strensall.

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607	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to PM101, this modification is not justified. approach taken to identify this boundary is flawed - lack of transparency and justification as to how the findings within the document have resulted in GB boundaries.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM101, this modification is not effective. There is a risk that the local plan will not be deliverable over its period.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to PM101, this modification is not consistent with national policy. there is no clear evidence to demonstrate why safeguarded land has not been identified to meet needs beyond the plan period.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Define the boundary of the GB around Strensall such that land as Brecks Lane is excluded from the GB and allocated for residential development on the Local Plan Proposals Map.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Brecks Lane site should be identified as safeguarded land on the local plan proposals map if it is not allocated for development.

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607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Council should identify additional land to meet the housing needs of the community and define the GB boundary accordingly. Such sites should be able to deliver early in the plan period.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Identification of a portfolio of small sites allocations (up to 250 dwellings) around existing settlements and the main urban area would assist in meeting any shortfall created by the delay in large sites delivering dwellings early in the plan period.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Brecks lane site should not be included within the identified GB boundary, as it does not serve a GB function - allocated for residential development to help the council meet its housing requirement.
607	Taylor Wimpey UK	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York2	With respect to PM70 and PM71, this modification is not positively prepared. The policy as currently worded is overly prescriptive and does not provide opportunity for residential development to come forward where it may be acceptable. Should make sufficient provision so that sites can be assessed on an individual basis at the planning application stage.
607	Taylor Wimpey UK	Section 09 Green Infrastructure	GI2A Strensall Common SAC	With respect to PM70 and PM71, this modification is not clearly justified. Lack of justification for the 400m distance identified for the outer boundary of the Exclusion zone.

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607	Taylor Wimpey UK	Section 09 Green Infrastructure	G12A Strensall Common SAC	With respect to PM70 and PM71, this modification is not effective. The diagram identifying the proposed exclusion zone is not sufficiently detailed in scale. Difficult to determine exactly the boundaries.
607	Taylor Wimpey UK	Section 09 Green Infrastructure	G12A Strensall Common SAC	Provide a plan of a sufficient scale so that the boundaries of the exclusion zone can be clearly identified against existing land features and boundaries
607	Taylor Wimpey UK	Section 03 Spatial Strategy	Policies Map (Green Belt)	Provide clear justification for the 400m distance identified for the outer boundary of the exclusion zone
607	Taylor Wimpey UK	Section 09 Green Infrastructure	G12A Strensall Common SAC	The wording of part (b)(ii) of the policy should be amended as follows: "proposals for other housing development which are not within plan allocations will not be permitted unless it can be demonstrated that they will have no adverse effects on the integrity of the SAC, either alone or in combination with other plans or projects. Any necessary mitigation measures may be sought through planning contributions and must be secured prior to the occupation of any new dwellings and secured in perpetuity. Open space provision must also satisfy policy G16"
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes the topic paper should be a summary of the journey in the policy formulation and the how the evidence influenced the policies in the plan. Respondent argues that the first addendum has been used to set out the methodology for the first time and is now attempting to revise the methodology and introduce changes to the results of the assessment.

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612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The addendums go beyond clarifying a point or correcting an error, instead representing wholly new evidence rather than corrections or points of clarity.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent argues the addendums raise new evidence at an extremely late stage in the process that is fundamental to the council's ability to make decisions concerning GB boundaries.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is unacceptable for the council to decide to change the emphasis of an assessment, further representing an alteration of the preferred option on which the plan is based during examination.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is unsound due to the shortcomings of the evidence base.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes the plan is not sound as the council appears to be attempting to retrospectively justify decisions previously made by attempting to fill gaps within the evidence base.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council is setting out evidence that should have been collated, analysed and consulted upon before such an advanced stage in the process. NPPF (2012) states how local plans should be based on adequate, relevant and up to date evidence.
612	Joseph Rowntree Housing Trust	Whole Plan	-	Events to date are not sound and not in the spirit of the process that are set out clearly in legislation, national policy and guidance.
612	Joseph Rowntree Housing Trust	Whole Plan	-	Respondent believes the council needs to take ownership of the flawed process rather than attempting to hold on to the last few bare threads.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned the council has not taken on board some of the inspector's initial comments expressed in the letter to the council (EX/INS/15) - particularly in relation to the assessment against purpose 3: "to assist in safeguarding the countryside from encroachment"
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to para 41 of EX/INS/15, the nature conservation or open space designation should not be included in the extent of GB as the GB policy is not the correct policy tool.

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612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	The methodology is flawed and application of 'shapers' is still evident. Section 5, boundary 11-15 East of Woodland Place to the rear of Pollard Close. In terms of the five purposes of GB, this area of land does not check the unrestricted sprawl of York because the land penetrates into the urban extent of the settlement. As such, it does not serve to contain development in any respect.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	This land at boundary 11-15 East of Woodland Place to the rear of Pollard Close should be excluded. Instead the boundary should be drawn across the 'mouth' to create an east/west boundary as a continuation of the outer extent of the urban area.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 5, boundary 21-27 Land to the East of Huntington and North of Monks cross. This sliver of land is identified to be included within the GB even though it does not form part of the wider open countryside that needs to be protected from encroachment.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Sections 23-26 of the proposed boundary should be excluded and instead the boundary should be drawn so as to form a north/south boundary around the edge of York with a view to protecting the openness of the agricultural land to the east.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Comments refer to PM31 - a previous modification

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes it is correct that the park should not be designated GB because the current use of Homestead park can be protected by the greenspace policies.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes there should be only one plan period in respect of both policies and proposals rather than the current approach where the council is attempting to outline policies for the remaining 12-year period and then proposals for the remaining period of 17 years. This approach is unsound as it is not compliant with national Policy and legislation.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	Policies Map (Green Belt)	There is no legitimate reason for the local plan to include two different time periods. NPPF, para 139 states that the means by which the permanence of the GB is to be preserved, which is through the designation of safeguarded land.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned that the council intends to allocate sufficient land for a 17-year period that will then require GB boundaries to be reviewed at the end. In such a case, boundaries will not be permanent because they will not endure beyond the end of the plan period.
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Concern over whether if the council over-delivers across a number of years and reaches the housing requirement of 13, 152 in advance of the end of the plan period then the supply tap might be turned off and applications for development refused.

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612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Wording of 'average' should be eliminated, to allow the council not to prevent sites coming forward on the basis of past delivery rates in the event the annual target of 822 or the total of 13,152 was exceeded
612	Joseph Rowntree Housing Trust	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned the approach is no longer compliant with national planning policy. Government does not expect a local plan to only deliver the overall requirement by the end of the plan period. The intention of the plan is only to deliver what is necessary by averaging out the annual delivery rate, which respondent believes does not comply with para 59 NPPF.
613	Askham Bryan College	Whole Plan	-	Respondent does not consider the local plan to be sound, found it to not be positively prepared, effective, justified, and not consistent with national policy.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider washing over the College Campus as Green Belt conflicts with draft policy ED7 and the wider Local Plan strategy objectives. It would seriously constrain the College's ability to expand and enhance its facilities which would be supported by policy ED7 but would not accord with Green Belt policy.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent consider the Councils approach to justifying its Green Belt boundaries, is fundamentally flawed. The land does not serve any of the 3 Green Belt purposes relevant to York, and there is no evidence to support the Council's case that it should be kept permanently open.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
613	Askham Bryan College	Whole Plan	-	The respondent doesn't believe plan is fit for purpose and does not show good judgement for reasons included with the representation.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Test 1: Positively prepared- Plan is not positively prepared. There has been no objective assessment of development need in relation to Askham Bryan College. This is necessary to inform Green Belt Boundaries. These representations provide clear evidence that dismiss the Council's unevindenced assertions within EX/CYC/59 regarding the College's development needs.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Test 2:Justified- The plan is not justified. Green Belt boundary in relation to the College has considered no alternatives and is not the most appropriate strategy since the development needs of the College have been overlooked and there has been no assessment against Green Belt purposes or the important contribution (or otherwise) that the College campus makes to openness. The land is not open countryside, given it has been a college for over 70 years.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Test 3: Effective- The plan is not effective. There are clear contradictions within the plan itself. In relation to the College policies GB1, GB2, and GB3 conflict with ED7 and the local plan objective to contribute to making York a world class centre for education.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Test 4: Consistent with national policy- The plan is not consistent with nationally policy. The Council's proposal for washed over green belt in relation to the College is contrary to NPPF para. 85 and 86 and would not be permanent. The development needs of the College have been overlooked and there has been no assessment against the Green Belt purposes nor the important contribution (or otherwise) that the College campus makes openness.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Given the urbanised character of the College campus, its known needs within the plan period and its crucial importance to the social and economic well-being of the City and nationally, it should be inset within the Green Belt and a suitably worded positive policy formulated to control development within the built part of the campus. A proposed inset boundary is provided within these representations.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent consider Emerging Local Plan is unsound in relation to aspects relevant to Askham Bryan College York, specifically its campus being 'washed over' by green belt.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Local Plan documents EX/CYC/59 including annexes, particularly EX/CYC/59f are unsound.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Changes required: Inset the College campus within the green belt as shown on Map 4 below, and a suitably worded positive policy formulated to control development within the built part of the campus.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider College campus within the Green Belt does not correctly interpret and apply the requirements of NPPF 2012 para. 85 and 86 in that the city council has:-//Not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider College campus within the Green Belt does not correctly interpret and apply the requirements of NPPF 2012 para. 85 and 86 in that the city council has:-//Failed to ensure that the Green belt boundary will not need to be altered at the end of the development plan period.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider College campus within the Green Belt does not correctly interpret and apply the requirements of NPPF 2012 para. 85 and 86 in that the city council has:-//Not defined boundaries around the College, using physical features that are readily recognisable and likely to be permanent.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider College campus within the Green Belt does not correctly interpret and apply the requirements of NPPF 2012 para. 85 and 86 in that the city council has:-// Included land which is not necessary to keep permanently open.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider College campus within the Green Belt does not correctly interpret and apply the requirements of NPPF 2012 para. 85 and 86 in that the city council has:-//Has failed to provide any proper justification or detail about the 'important contribution' the developed College Campus makes to the openness of the Green belt.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider there is a lack of substance and evidence underpinning key statements within EX/CYC/59 and EX/CYC/59f specifically, para. 7.25 claims that 'the capacity of existing higher education sites have been assessed for their potential to meet future needs. Askham Bryan College...is anticipated to have capacity to meet its needs without the need to reduce openness'. Respondent believe their evidence shows that this is definitely not the case, and it is simply not understood on what basis the Council could have arrived at this conclusion.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Askham Bryan College provides higher and further education, special educational needs and difficulties (SEND) facilities, student residences, business operations, a wildlife park and visitor attraction, amongst other facilities. College 1 of 10 independent specialist land-based colleges designated within FE sector and is national centre of excellence. Principal provider of land-based education for York, wider region and North of England and works with 14 Local Authorities and 5 Local Enterprise Partnership (LEP) regions. College requires rural location for its operations and cannot be located within urban area. Academic year 2020/21, 3,400 students enrolled from entry level provision to honours degrees and by 2025/26 growth forecasts more than 4,500 students. Existing student residences are oversubscribed and currently over 800 student reliant on daily transport with some commutes more than 2 hours. The college adopted Visions to 2030 which, over next 5-10 years, will see College strengthen its status as a higher and further education provider, student residence provider, business incubator, and global and national centre of excellence for both bio-economy and nature conservation respectively (included in respondents Appendix 1). College prepared its Development of College Estate to Meet Strategic Objectives including Masterplan document (included in respondents Appendix 1). Demonstrate that development needs of the college require additional built form in the immediate future, in terms of footprint and volume which will undoubtedly impact on openness of green belt and would be treated as inappropriate development in the green belt. This will impact upon the College's ability to continue to provide high quality education for the reasons set out in Appendix 1 and is therefore seriously counterproductive to its aims and objectives.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	BIOYORKSHIRE major initiative is partnership between the College, University of York and FERA Science, San Hutton. Aims to secure capital and revenue funding from Government to facilities the creation and delivery of a strategic and co-ordinated programme that will establish York and North Yorkshire as the UK's global centre of excellence for bio-economy solutions as well as contributing to their ambitions to become the nation's first carbon-negative region through Innovations such as low carbon farming. This is anticipated to fund a sizable expansion of the College, along with other identified funding opportunities. It's scheme which is understood to be strongly supported by the City Council , and yet which will be frustrated by the over-washing of the campus by green belt.

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613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Rather than recognising the College as THE provider for high quality education on rural economy and environment serving the city and region, in terms of major contributions to education, skills, economic growth and the contribution it will take to realising the Local Plan objective of making 'York a world class centre for education', the Council's approach to the Green Belt is unduly restrictive and hugely constrains its potential as well as known requirements for short term growth and redevelopment.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider Local plan policies that relate to the College are confused, contradictory and not evidence based. That it doesn't appear to be based upon even a cursory attempt to understand the needs of the College within plan period the Council's approach to defining the Green Belt is fundamentally flawed because:- It fails to consider the identified development needs of the college in relation to the economic and education strategy of the local plan and the major benefits and opportunities available to the city.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider defining the Green Belt is fundamentally flawed because:- It inhibits College's ability to attract external funding due to the planning policy presuming that building projects will be inappropriate unless they preserved openness.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider defining the Green Belt is fundamentally flawed because:- There's been no attempt to define College boundary as part of the green belt assessment and the local plan education allocation boundary (in respondents Attachment A) is arbitrary and excludes important teaching areas, such as the wildlife and conservation park.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider defining the Green Belt is fundamentally flawed because:- There has been no consideration of whether the land serves a Green Belt purpose, nor against NPPF paras 85 and 86.

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613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider defining the Green Belt is fundamentally flawed because:- There's been no attempt to secure a site-specific policy which enables a positive policy context for infill or redevelopment within the existing built campus area, let alone decanting space or the accommodation of new development to meet known needs.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents suggest the green belts justification is flawed in its approach:- Washing Green belt over entire College campus seriously constrains its ability to facilitate its known needs to facilitate sustainable growth and redevelopment during the plan period, in order to meet the legitimate needs of the College during the extended local plan 2038. This approach is not based and doesn't comply with NPPF para. 85 and 86 and frustrates the College as a centre of academic excellence.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents suggest the green belts justification is flawed in its approach:- Council policies GB1, GB2, and GB3, and its approach to designating boundaries of green belt fails to reconcile constraints on activities which the green belt imposes with aspirations and objectives of the local plan, that is the local plan strategy. This is apparent in its approach to educational institutions which are adjacent to or within green belt. Specifically, the approach to the green belt in relation to Askham Bryan College contradicts Policy ED7 and would unduly restrict the college's ability to evolve its curriculum and access existing and future funding opportunities and the educational enhancements that would follow.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider clear conflict with Council's Local Plan claimed objective to contribute to making York a world class centre for education. College has plans to continue to play role as part of a centre of excellence for rural and bio-economy benefiting the whole North of England. That is especially so given the importance of the agri-industry to the economic success of the region, for which Askham Bryan is the premier such educational facility in the North. The landscape of Yorkshire provides for unrivalled rural diversity in terms of farming and methods. Askham Bryan College is ideally located to capitalise on these opportunities and deliver long term economic benefit to the North and the UK.

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613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	College, in partnership with industry and other education institutions including BP, Ocado, FERA and the University of York propose that York becomes a centre of excellence for the bio-economy and the environment. Funding received from Bio-Yorkshire initiative alone, to develop skills and expertise, business start-ups and growth, is likely to see higher education student numbers increase by circa 1000 within plan period. Student taught using latest technologies, providing valuable supply of highly skilled, flexible members of the future workforce, contributing positively to the wider economy, environment, and broader sustainable development objectives. Its activities and its estate has evolved and will continue to do so from aspects such as:- //Role as a global centre excellence for bio-economy//role as a national centre of excellence for nature conservation, and wildlife park visitor attraction (25,000 visitors per annum)//demand for student places and student residences//research development needs// business start-up initiatives e.g. incubator space, sharing expensive machinery with start-ups, up scaling production// showcasing innovation and 'best practice' demonstrator for industry// available funding regimes//requirements of the courses/training offered and the changing curriculum//buildings becoming no longer fit for purpose from physical condition, capacity, location etc.// Increasing running costs: energy efficiency, availability or natural lighting, natural ventilation, insulation etc.//
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents, appendix 1, 'Askham Bryan College- The Development of college Estate to Meet Strategic Objectives provides up-to-date overview by the College of its character & strategic vision. It's Vision includes securing external funding and improving facilities so that they match up to changing requirements of curriculum, needs of the student community and to meet new agenda, e.g. energy efficiency & sustainability. College is specialist land-based education provider with ability to provide technical and professional training to meet current & future needs of related industries and address challenges this part of the UK economy faces. College requires rural setting for much of its activities and requires space to meet changing demands on its estate. Brexit and impact of Covid pandemic have major impact of Covid pandemic have major impacts on this sector and need for continued success of college is obvious. College needs flexibility and space to consolidate its existing position and to reach its vision for York site, which is particularly important due unique way College is funded and associated bidding processes. Its aim over next 5 years is to deliver sustainable campus for the future, retaining elements of existing estate, and developing a re-envisaged campus in accordance with the College's strategic plan. The vision goes beyond simply maintaining existing buildings, many of which will require significant investment and instead encompasses a programme to enable the development of

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				appropriate technical and vocational teaching space aligned to proposed curriculum and facilities development.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent consider that to replace an existing building requires decant space such as a site for new building and later demolition of that replaced. New capacity also needs space to locate a building. In order to accommodate the proposed new development there is a need for wide clearances around the construction site to allow the College to function safely during the construction period. Construction site compounds will be required and storage.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider that to include the entire College site within Green Belt grossly inhibit its abilities to meet its needs for sustainable development to accommodate known development needs within the plan period. This is particularly inequitable as other tertiary education institutions located in urban locations are not so burdened and given the nature of the College it must be located within a countryside context.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider their additional Map 3 Masterplan for the next 10 years of the College to accompany their vision 2030 document. Along with College's Development of the College Estate to Meet Strategic Objectives document, it illustrates that a significant number of projects are proposed which all have been individually justified but implementation is reliant upon securing external funding.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Planning Policy Context:- The emerging Local Plan submission Version May 2018 addresses education in Section 7. It states para 7.1: 'Building on recent years' investment in the city's education facilities, to contribute to making York a world class centre for education it is vital to provide the quality and choice of learning and training opportunities to meet the needs of children, young people, adults, families, communities and employers. The Council has a key role in supporting parents and families though promoting a good supply of strong educational facilities whether this is schools, academies or free schools which reflect the aspirations of local communities. It is also important to ensure that facilities at the City's further education

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				establishments and two universities meet the requirements of modern education institutions'. Policy ED7 specifically references Askham Bryan College. It states: 'The continued success of York College and Askham Bryan College is supported, including any further expansion of their teaching, administration, research operations and student accommodation at their existing campuses as shown on the proposals maps.' Para 7.24 states: 'Askham Byran College specialises in a wide range of subject areas, across a variety of sectors: offering entry level courses, apprenticeships, diplomas at a range of levels through to a BSc degrees with Honours. It lies within the Green Belt Policy ED7 supports the college in developing its operations, however, at the same time it is important to maintain the land's Green Belt status, in doing so any future development must not have a greater impact on the openness of the Green Belt than the existing development. For more information on the plan's approach to the Green Belt please see section 10: Managing Development in the Green Belt'.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Policies GB1, GB2 and GB3 would be applicable to development of the College site and each of these policies adds an additional layer of development constraint that goes beyond the openness test specified in the supporting text of policy ED7. The logic of the Plan is that it professes express support for necessary development at the College, whilst also treating such development as 'inappropriate development' in the green belt, and requiring, by inference, the proving of very special circumstances.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers there are conflicts between these policies and its supporting test such that the Council's policy approach is confused and contradictory. They consider this to be highlighted by the College 20/01923/FULM which engaged the 'very special circumstances' test to clearly outweigh harm to the green belt, the harm to the openness and permanence of the green belt and the harm to the visual character and amenity arising from the proposed development. Such uncertainty and constraint evidently restrict the College's ability to access funding invest and thereby deliver education enhancements.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 7-EX/CYC/59: Methodology:- Channelling Development to Urban Areas is again high level related to higher and further educational provisions. Para.7.25 claims that there has been a properly robust assessment to consider future needs and current site capacity, which is said to underpin the Council's understanding as to how the College's need have been considered. However, no such work has ever been provided in the public domain, this is a gross failure to justify a key part of the plan. The plan states that: 'The capacity of existing higher education sites has been assessed for their potential to meet future needs as follows...' // 'Askham Bryan College

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				is a rural college is a rural, which is not considered to be within the urban area and is anticipated to have the capacity to meet its need to reduce openness'
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider justification for 'washing over' the College Campus (Askham Bryan College) within the Green Belt is contained EX/CYC/59f at page 334 which is limited to a brief description of the area and conclusion as follows: 'Character of the area: Located to the south of Askham Bryan village, set back from the A64, the development of Askham Bryan College is surrounded by open agricultural fields and there are large areas of open space within the college which add to its open nature and rural feel. This urban area exhibits a high degree of openness of Green Belt. It is recommended that Askham Bryan College be included within the Green Belt'. 'Strategic Performances: The long term strategic permanence of the Green Belt is determined by its ability to endure over the lifetime of the plan and beyond. This statement should be washed over within the Green Belt due to the important contribution which the open character of the settlement makes to the openness of the Green Belt'. Respondent consider this a failure to assess and balance development needs over the plan period, let alone the potential effect of the proposed designation, despite describe the characteristic of the campus as an 'urban area'.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Council has resolved to approve planning application, subject to referral to Secretary of State (reference 20/01923/FULM- resolution dated 1st July 2021) the erection of 2 cattle buildings,1 hay/straw storage building, 1 enclosure, 2 tanks, and hardstanding for use as a beef rearing unit. The proposed 3 buildings are sizeable and would create floor space (1,116sq.m). The Council concluded that the proposal would have a harmful effect on the openness of the greenbelt, noting that whilst they were agricultural in nature they were intrinsically linked to the provision of education. This is a facility which would otherwise be considered to be not inappropriate development in the green belt had its function been purely for agriculture and not as part of a teaching institution, and yet the application is treated as inappropriate development in the green belt and is referred to the Secretary of State as a departure from the plan. This illustrates the serious constraint effected by the designation, despite a positive consideration by the Council as local planning authority.

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613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider the Council's approach to defining the Green Belt boundaries in relation to Askham Bryan College is fundamentally flawed and should be revised. Respondents have included a map of they're proposed new boundaries. College to be inset into green belt.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents consider basic premise of the Council's case is that the College site should be washed over within the Green Belt due the site (which is described as an 'urban site') exhibiting a high degree of openness, and its contribution to the Green Belt. Respondents however, consider CYC_59 to not include any details of what evidence or even the most basic assessment underpins these conclusions, i.e. there appears to be no consideration of openness in terms of visual impacts, its spatial dimension, nor consideration of whether the land serves a Green Belt purpose, and there no engagement with what level of need would arise over the plan period. Inference is that further development would unacceptably erode that high degree of openness.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Urbanised character of the character of College campus, its known needs within the plan period and its crucial importance to the social and economic well-being of the city and beyond that it should be inset within the Green Belt and suitably worded positive policy formulated to control development within the built part of campus. The Council's base shows the College site was considered for inseting and the justification for 'washing over' the college campus within the green belt it said to be contained within TP1:Approach to defining York's Green Annex 4, CYC_59f page 334. However, this supposed justification is no more than a brief and inadequate description of the area and conclusion. There is no consideration of whether the land serves a Green Belt purpose for example, let alone any assessment of the needs of the College.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents are concerned over the inconsistency in the Council's approach to the College site and other sites which have similar characteristics which have been inset, most notably:- Elvington Airfield Industrial Estate//Elvington Industrial Estate//Murton Industrial Estate/York Auction Centre//Northminster Business Park// Towthorpe Lines// York Designer Outlet (McArthur Glen)// Respondent consider it inconsistent that such sites have been chosen to be inset, but the College has not.

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613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent consider Council has not taken account of the undisputed evidence as to the education, research and business needs in relation to the College (Askham) in its approach to defining these Green Belt boundaries. The council has not considered up-to-date information on future student numbers nor business expansion plans held by the College. It's unknown how the Council has considered the development needs of the College and as such Para.4.51 of CYC_59 is misleading in relation to the College i.e. // 'Work to understand the expansion opportunities of these establishments has focused on discussions around recent trends in student numbers and the associated business expansion plans of these organisations as well as an understanding of the type of land uses required and their suitability to fit with the green belt' // Senior management team at the College is not aware of there being any dialogue between the College and the Council's local plans team regarding student numbers and business expansion plans in the last 5 years, and it has not had sight of any evidence which seeks to address this point.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 7.25 of EX/CYC/59 provides an indication as to how the College's (Askham Byran) development need has been considered. It states that:- 'The capacity of existing higher education sites has been assessed for their potential to meet future needs as follows....' // 'Askham Byran College is a rural college, which is not considered to be within the urban area and is anticipated to have the capacity to meet its needs without the need to reduce openness' // Respondents consider it unclear how the Council arrived at this conclusion. With the Council's assertion that the College is anticipated to have the capacity to meet its need to reduce openness'. It is unclear how the Council has arrived at this conclusion. In fact, the Council's assertion that the College 'is anticipated to have the capacity to meet its needs without the need to reduce openness' (Para. 7.25 of EX/CYC/59) doesn't appear to be evidence based. These representations provide up-to-date evidence to rebut the Council's position, specifically the College's Development of the College Estate to Meet Strategic Objectives document in respondents Appendix A of these representations provides strong counter evidence.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Washing over College campus (Askham Bryan) within the Green Belt presents a clear conflict with the Council's approach to the Green Belt and its claimed Local Plan Objective to contribute to making York a world class centre for education. Para. 4.46 and 4.51 of EX/CYC/59 considers education need as follows: // Para 4.46: 'To contribute to making York a world class centre for education it is vital to provide the quality and choice of learning and training opportunities to meet the needs of children, young people, adults, families, communities and employers. The local plan has a role to help meet this vision by providing sufficient land to for educational facilities to reflect the aspiration and needs of local communities' // Para 4.51: 'Establishing need for higher education is a more complex process and work to understand the expansion

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				<p>opportunities of these establishments has focused on discussions around recent trends in student numbers and the associated business expansion plans of these organisations as well as an understanding of the type of land uses required and their suitability to fit with the green belt'// Importance of the College was acknowledged throughout the local plan consultation.</p> <p>Unfortunately, the Council's approach to the Green Belt with regards to Askham Bryan College has entirely overlooked the evidence and consultation response cited in Cd013b-Annex 1 City of York Local Plan Sustainability Appraisal Appendix K- Policy and Site Audit Trail (February 2018) for example:- Preferred options June 2009 consultation response: 'The approach should acknowledge the significance of Askham Bryan College as it provides specialist land-based education and training of national and regional importance'// Local Plan Preferred Option- June 2013 evidence and approach: 'The continued success of all further and higher education institutions is supported, including any further expansion of their teaching and research operations, other facilities and student accommodation at their existing sites and campuses'// Local Plan Preferred Options-June 2013 Consultation response: ' Envisage a policy for Askham Bryan College similar to that for the University which would guide the type, form and location of new development within the settlement limits'.</p>
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	<p>Within EX/CYC/59 respondent finds notable differences in the Council's approach to Askham Bryan College compared with York College, York St John University, and the University of York, given the anticipated growth and development needs of these other institutions is expressly acknowledged, e.g. para. 4.5.1 for York College. Respondents consider the Council's confused approach is highlighted by the fact that none of the most recent development management decisions (planning application references 20/02400/FUL dated 16/02/2021: 20/00394/FUL dated 06/04/2021 and; 20/01923/FULM- resolution dated 1st July 2021) considered the proposal with reference to policy GB2: 'Development in Settlements within the Green Belt' yet EX/CYC/59f defines the College as a 'Densely Developed Area in the General Extent of the Green Belt' and refers to the College as a 'settlement' (page 334).</p>
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	<p>The local plan evidence base contains no assessment of the College site against Purpose 4: Preserving the setting and special character of historic towns (primary importance for York// PURPOSE 4- Preserving the setting and special character of York is acknowledged as a strong factor in defining the inner boundaries of the City's Green Belt. The council produced its Approach to the Green Belt Appraisal Map (Figure 3 in EX/CYC/59) to aid in the identification of those areas surrounding the city that should be kept permanently open. The college campus is not identified on this Map. This map also demonstrates that development on the campus site would be unlikely to affect the setting of the historic village of Askham Bryan. The key view</p>

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				corridor from the A64 towards the Minister identified from the A64 would be unaffected by the College campus. From the A64 there is visual severance by virtue of the dense vegetation along this boundary.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	The local plan evidence base contains no assessment of the College site against Purpose 1: Checking unrestricted sprawl// PURPOSE 1- Educational development on an existing education site cannot be considered as threatening unrestricted sprawl. This is a defined site with a specific use and readily recognisable boundaries. Indeed, the very nature of an inset within the Green Belt prevents urban sprawl beyond the inset.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	The local plan evidence base contains no assessment of the College site against Purpose 3: Safeguarding the countryside from encroachment// PURPOSE 3- A college has existed on this site since 1948. The council's own land characterisation study considers the land to be 'institutional'. The main campus is not open countryside and has not been since 1948. It is densely urbanised for the most part which is reflected in the Council's consideration of the Site in EX/CYC/59f. The College is an active, busy College campus with facilities for its 3,400 students and associated operations.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 85 and 86 of NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed by the Council:- Ensuring consistency with Local Plan Strategy. The Council's approach to defining the Green Belt boundaries in relation to Askham Bryan College campus and its inclusion within the Green Belt has taken no account of the legitimate needs of the College to replace and augment their current built estate nor the need for decant space to develop additional floorspace yet keep the College operational throughout. Instead, it has wrongly asserted that any needs which arise can be accommodated in some way without impacting further upon the openness of the Green Belt- presumably based upon a position of nil growth. The local plan policy ED7 supports new and enhanced educational facilities at the College so there is inconsistency with the local plan strategy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 85 and 86 of NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed by the Council:- Not include any land which is unnecessary to keep permanently open: EX/CYC/59f makes no attempt to define the College campus, , there is no critical assessment of whether it is necessary to keep the College land open, and it does not consider openness in terms of visual impacts, its spatial dimension, nor consideration of whether the land serves a Green Belt purpose. It's unclear what Green Belt purpose is served by keeping the College campus within the Green Belt.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 85 and 86 of NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed by the Council:- Not include any land which is unnecessary to keep permanently open: The Council's own evidence defines the College as a 'Densely Developed Area in the General Extent of the Green Belt' and refers to the College as a 'Settlement', (EX/CYC/59f page 334). The council first produced its Approach to the Green Belt Appraisal Map in 2003 (respondent includes image) to aid the identification of those areas surrounding the city that should be kept permanently open. The College campus is not identified on this map. The core College campus (shown in respondent Map 2) does not exhibit a 'high degree of openness' and therefore does not contribute to the openness of Green Belt. As shown on photograph (respondent included) Attachment C, the site has an urbanised character and is compact in nature, centred around the original 1940's college buildings including extensions, modern teaching blocks, several student residence (up to 3 storey in height), large agricultural sheds and structures, and associated car parking and access roads. While the campus is surrounded by fields the main campus itself is compact and reads as a dense collection of buildings and structures from all angles. From the A64 there is visual severance by virtue of the dense vegetation along this boundary.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 85 and 86 of NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed by the Council:- Ensure permanence in the boundaries proposed: The proposed Green Belt boundary inhibits the scope of the College to cater for its legitimate growth and enhancement, thus pressure to revise the Green Belt boundaries to allow such growth will become immediate. This threatens the permanence of the boundaries. The Council's assessment of the Strategic Performance (EX/CYC/59f page 334) of the College site (i.e. 'The long term strategic permanence of the Green Belt is determined by its ability to endure over the lifetime of the plan and beyond') is significantly challenged. This is already apparent given recent planning permissions which add to the built footprint of the College. In its determination of planning application 20/01923/FULM the Council has unequivocally accepted that the College, when considered cumulatively, amount to 'very special circumstances' that clearly outweigh the definitional harm to the Green Belt, the harm to the openness and permanence of the green

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				belt. Furthermore, the amendments to Part 7 class M of the GPDO (2015) which came into force on 21 April 2021 allows for extensions etc. to colleges by up to 25% of their April 2021 footprint without planning permission provided that the works are not located on playing fields.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 85 and 86 of NPPF 2012 advises on the defining of Green Belt boundaries. This advice is not followed by the Council:- Define boundaries clearly using physical features that are readily recognisable and likely to be permanent: If other arguments respondents put forward are accepted there is a requirement to define the Green Belt boundaries in relation to the college since the Council's position that the College should be washed over by Green Belt is entirely unsustainable. The most apparent options in terms of defining the boundary of an onset within the general extent of the Green Belt are as follows:- (1) Rely on the Council's education allocation boundary for the College (respondents attachment D) but this is arbitrary since it excludes important teaching areas and lack a readily recognisable and permanent boundary to the South. (2) Refer to the main College campus (Respondents Map 2 and 4). The main campus is bounded on three sides by roads which provide a readily recognisable physical features which are likely to be permanent, namely the A64 to the south, Askham Fields Lane to the East, and York road to the north, and taking in the ribbon development up to the public right of way (routes codes 21/4/10 and 2/8/10) as the western boundary.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	The college campus fulfils none of these purposes and therefore there is no case to keep it permanently open and the main college campus should be inset within the Green Belt.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	NPPF (2012) Para. 86 states: 'If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt'. The Council has not followed its own methodology as set out in paras 6.26-6.31 in EX/CYC/59, page 334 of EX/CYC/59f provides a short character assessment of the college with reference to EX/CYC/59 para.6.26 but fails to provide any justification or detail about the 'important contribution' the

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				college campus makes to the openness of the Green Belt with reference to EX/CYC/59 Para. 6.28.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Council's approach to the Green Belt boundaries has not correctly identified sustainable development needs of York. Our evidence clearly shows that on order to implement the local plan strategy for further and higher education, Askham Bryan College must be excluded from being in permanent Green Belt.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	The exclusion of Askham Bryan College from the permanent Green Belt, the respondent considers this position is endorsed by the Council's recent planning decision in relation to planning application 20/01923/FULM. The council accepted that the economic and educational benefits, together with the location constraints of the College, when considered cumulatively, amount to 'very special circumstances' that clearly outweigh the definitional harm to the green belt, the harm to the openness and permanence of the Green Belt.
613	Askham Bryan College	Section 03 Spatial Strategy	Policies Map (Green Belt)	Given the above evidence, the main College campus should be inset within the Green Belt, and a suitably worded positive policy formulated to control development within the built part of the campus. The proposed boundary in shown in respondents attached Map 4.
616	The Coal Authority	Whole Plan - Sustainability Appraisal	-	The Coal Authority has no specific comments to make in respect of the proposed modifications to the SA.

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616	The Coal Authority	Whole Plan	-	York has very limited coal mining legacy, only 2 recorded mine entries, in the location of North Selby Mine. Have no specific comments to make on the Strategic Housing Land Availability Assessment update, April 2021.
616	The Coal Authority	Whole Plan	-	The Coal Authority has no specific comments to make in respect of the proposed modifications to the Proposed Modifications
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A reset of the plan period so that the start of the plan period is more closely aligned with the likely adoption date of the plan.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent argues that by the time the plan is adopted, at least 6 years of the plan period will have passed, effectively making it a 10-year plan. This has significant consequences for the permanence of the Green belt.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Changes are required to identify the Galtres Garden Village site as an allocated freestanding settlement site as previously set out in the respondents representations on the reg 19 consultation in April 2018 and in their representations on the first set of modifications in July 2019.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
620	Galtres Garden Village Development Company	Whole Plan	-	Respondent does not consider the document to be sound as it fails on all tests of soundness.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan has not been positively prepared because the GB boundaries are tightly drawn around the urban area and therefore the permanence of the GB beyond the plan period is not guaranteed.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	Policies Map (Green Belt)	Failed to ensure that the Green Belt boundary will not need to be altered at the end of the development plan period as well as including land which is not necessary to keep permanently open.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is not positively prepared because it makes inadequate provision for the housing needs of the city.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Galtres Garden Village site continues to represent a viable and deliverable housing site and would provide a significant level of housing including affordable housing and housing for older people. The site has willing landowners committed to making it available in the short-to-medium term, contributing to housing delivery within the first 5 years of the allocation being confirmed in an adopted plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
620	Galtres Garden Village Development Company	Section 05 Housing	H1 Housing Allocations	The plan is not justified because elements of the evidence base are incorrect. The housing supply trajectory over-estimates the amount of housing in the plan period.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Galtres Garden Village will have at least 40% of the dwellings as affordable units. The new settlement will be set within landscaped environment that will include generous planting around the boundaries of the settlement and large areas of open space through its core.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is not effective as it does not make adequate land provision for housing or employment needs.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	Policies Map (Green Belt)	The plan is not consistent with national policy as it does not provide a permanent GB boundary - it is not consistent with national policy for meeting identified and known requirements for sustainable development including housing development.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The use of 2016 population and household projections is contrary to government guidance. Given the persistent under delivery of housing and in particular the major failings in affordable housing provision in the city a more pro-active and aggressive approach to the housing requirement is needed.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The calculation of completions since 2012 is too high - the council estimate of backlog is too low.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The GB boundaries are not defensible, given the substantial amount of additional housing land will need to be allocated if the council is to meet its identified housing requirements and confirm a permanent GB for York.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	(Site 964) The council's approach to justifying the GB boundaries, and its assessment on the contribution that the Galtres garden Village site can make to housing supply is fundamentally flawed.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Outstanding commitments include student housing that should be excluded as they do not meet housing need or contribute to affordable housing.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council have not adequately explained the use the ONS ratios or made the necessary adjustments to include student housing in the completion and supply figures.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	Policies Map (Green Belt)	The GB boundaries do not correctly interpret and apply the requirements of NPPF 2012 para 85; the council has not ensured consistency with the local plan strategy for meeting identified requirements for sustainable development, failed to ensure that the GB boundary will not need to be altered at the end of the development plan period, has included land which is not necessary to keep permanently open.
620	Galtres Garden Village Development Company	Section 05 Housing	H1 Housing Allocations	The assumptions on windfalls are questionable and should not be treated as a component of the plan.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement should be increased to 1,026 dwellings per annum for the plan period
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent estimates that strategic sites will only deliver 6,983 dwellings in the plan period, which would reduce affordable delivery from this source to 1,599 dwellings and total delivery to 2,591 or 162 affordable dwellings per annum over the plan period.
620	Galtres Garden Village Development Company	Section 05 Housing	H1 Housing Allocations	The housing trajectory set out in PM63a and PM63b should be altered to reflect what is likely to happen

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	(Site 964) Galtres Garden Village site should be identified as a free standing settlement
620	Galtres Garden Village Development Company	Section 05 Housing	H1 Housing Allocations	Respondent conducted some scenario testing to demonstrate the sensitivity of the local plan housing supply to small changes in the trajectory of the strategic sites and a 10% allowance for non-implementation.
620	Galtres Garden Village Development Company	Section 05 Housing	H1 Housing Allocations	Analysis demonstrates that whilst the optimistic supply trajectory assumed by the council results in a supply of 6.25 years, a more realistic assumption about commitments and a more robust approach to the housing requirement results in a supply of only 2.16 years, highlighting the need to make additional housing allocations.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Safeguarded land should be identified to a level that will ensure the GB boundary will not need to be altered at the end of the development plan period
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Whilst respondent supports the development of brownfield land, in the York context the proposed change to insert an additional bullet point that says "prioritise making the best use of previously developed land" is not required.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
620	Galtres Garden Village Development Company	Section 09 Green Infrastructure	G12A Strensall Common SAC	Respondent objects to the wording of the G12a b)ii on the grounds it is not positively worded.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement should be increased. Respondent suggests the Standard Method figure of 1,026 as the OAN for the plan.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Additional strategic sites that can deliver substantial affordable housing should be allocated in the plan to deliver the substantial boost to housing supply sought by the NPPF. Therefore site 964 should be included.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	Policies Map (Green Belt)	The local plan does not meet identified requirements for sustainable development. The failure of the council to take this opportunity to allocate safeguarded land to meet identified development needs beyond the plan period is a major shortcoming of the plan.
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Table 1a in PM55 presents an exaggerated representation of housing supply - particularly supply from Strategic Housing sites and should be revised to reflect more realistic delivery from these sites.

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620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	Policies Map (Green Belt)	The council has taken an overly restrictive approach in their evaluation to the boundary sections set out in Annexes 2,3 and 4 and in the assessment of freestanding settlements in Annex 5.
620	Galtres Garden Village Development Company	Section 05 Housing	H1 Housing Allocations	Changes to wording in PM64. "The timescale of each site is an indication of when we think the council considers the site is likely to come forward based on the assumption that the plan was adopted in April 2017 and reflects the timescale put forward by the landowner or developer in the discussion referred to above..."
620	Galtres Garden Village Development Company	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent criticises the evaluation which seems intent more on serving a pre-established conclusion that land not allocated to meet the plan's growth requirements must be designated as Green belt, rather than providing a critical analysis of whether it is necessary to keep the land permanently open.
620	Galtres Garden Village Development Company	Section 09 Green Infrastructure	GI2A Strensall Common SAC	Wording in PM70 is not positively worded. Alternative should be: "Proposals for other housing development which are not within plan allocations must demonstrate that they will have no adverse effects on the integrity of the SAC. Any necessary mitigation measures may be sought through planning contributions and must be secured prior to the occupation of any new dwellings and secured in perpetuity. Open space provision must also satisfy policy G16.
625	Roy Brown	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the document to be sound. Final submission reflects the careful consideration taken to simultaneously address the housing need and the protection of the green belt.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
625	Roy Brown	Section 03 Spatial Strategy	Policies Map (Green Belt)	Proposed modifications meet the needs of the people of York. Respondent pleased to see the addition of areas not previously included in the green belt, included in the amendment. Particular reference to Huntington parish.
825	Cllr Mark Warters	Whole Plan	-	Respondent considers local plan is not sound, do not consider it to be positively prepared, justified, effective, or consistent with national policy.
825	Cllr Mark Warters	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent questions the process of producing Annex 5, which he considers is reflective of the views of politicians rather than evidence.
825	Cllr Mark Warters	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Page 67, Para. 7.62 of Annex 5, respondent consider the statement, 'Where new sites for development are identified these should be those which cause the least harm to the primary purpose of the York Green Belt'. The land that officers were instructed to Site ST7 (previously Area B Pre 2011) was previously discounted by an earlier planning inspector by virtue of its value to the setting of the city. The lengthy documents supposedly seeking to justify site allocations are officers banging square pegs given to them by politicians into small holes.
825	Cllr Mark Warters	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The allocation of ST7 is not justified, effective, does not demonstrate a positively prepared plan and is not consistent with national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Upholding of previous planning inspectors decisions as to the land on which ST7 is located within other local plans and that is removal of ST7 given the previously highlighted value of the land to the setting of York- its primary green belt function.
825	Cllr Mark Warters	Whole Plan	-	Respondent considers local plan is not sound, do not consider it to be positively prepared, justified, effective, or consistent with national policy.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	On page 65 the allocation of H31 is described as a 'rounding off' of the green belt boundary. Respondent suggests this implies a lazy desk based decision to draw the boundary in this manner.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	The green belt boundary should follow the existing urban edge of the village if CYC are to ensure the continued contribution of the surrounding countryside in terms of openness and views.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers development of H31 would compromise green belt land outside of the proposed boundary drawn to accommodate H31 due to transport requirements.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers H31 allocation and the green belt boundary in this location is not justified, will not be effective in preventing urban sprawl and has not been positively prepared and should not be considered consistent with national policy.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Objects to the GB boundary change in relation to site H31. H31 would compromise openness and views and, due to transport requirements, further compromise GB land outside the boundary. Requests GB boundary drawn to follow the edge of the existing urban area rather than to include land allocated as site H31.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Annex 6- A6:25- PM84 Osbaldwick Gypsy Site- PM84 Respondent states that they fail to understand what value there is to this boundary modification, the green belt land defined by the boundary will be thoroughly compromised by the proximity to ST7. Respondent considers that since the gypsy site was permitted to expand into the greenbelt in 2013 the site has fallen into further disrepair and misuse.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Annex 6- A6:25- PM84 Osbaldwick Gypsy Site- PM84 Respondent considers that it may be in the future that due to the problems with the site and potential re-use of the old DVL Rail Link from Murton into York that pressure is brought to relocate the whole site. Modification requested to redraw the Green Belt boundary at the northern edge of the industrial estate, including the Osbaldwick gypsy caravan site in the green belt.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	CYC_59h/page A6:5/ Osbaldwick Village- Respondent concurs with PM33 although raises the same issues as those in CYC/59d Annex 3. Respondent asks how can the greenbelt protection be assessed without the illustration of the proposed ST7 transport link being shown. Such a transport route would bisect a huge amount of the land to the north of the green belt land and thoroughly compromise the purposes of the green belt boundaries.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
825	Cllr Mark Warters	Section 05 Housing	Site Allocation ST7	Removal of site ST7 from the local plan, or illustration of the traffic route so as to assess the value of PM33.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent concur with much written on pages 600-659 with regard to the need for the green belt boundaries and the quality of the of the landscape to be afforded protection this only serves to highlight the anomaly that is ST7.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers the inclusion of ST7 with its proximity to these areas of green belt will thoroughly compromise these boundaries creating urban fringe pressures likely to prevent the boundaries enduring for the length of the plan and certainly not beyond. Respondent views the proposed boundaries without the contrast of transport links to ST7 and considers it thoroughly misleading, especially with regard to boundaries 18 & 19. One of the main road links to ST7 would cut this proposed green belt into small unsustainable strips. Consideration of such boundaries without the transport links to major housing allocations is not effective, justified and indicates the plan in this respect to be not positively prepared.
825	Cllr Mark Warters	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent requests that GB boundaries are drawn to reflect the removal of site ST7.
825	Cllr Mark Warters	Section 05 Housing	Site Allocation H31	Objects to the GB boundary change in relation to site H31. H31 would compromise openness and views and, due to transport requirements, further compromise GB land outside the boundary. Requests deletion of site H31.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document is now wholly inaccurate and rendered obsolete by the pandemic. The economic situation is made unclear and it is probably not even worth requesting an update of the document. Examiners will no doubt pay more attention to the real house price increase data, the worsening affordability ratios, and the societal changes brought about by the pandemic. Increased requirement for home offices, garden space and adequate dwelling sizes. May be a long term trend that the plan will have to cater for at the expense of flats and student schemes but it will require more land.
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	An update to the current house price data used in the examination to provide evidence for the market signals analysis.
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Selby District Council make it clear that it and York are not operating a joint market and that Selby has no role in delivering York's housing supply.
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Concise document clarifying the position.
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	CYC need to acknowledge that Selby will not be providing any of its housing supply but shall continue to provide inflows of net commuters.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Document makes the wrong decisions on inner boundaries in contrast to the evidence provided by CYC at the earlier stages. It does not accord with the NPPF 2012 paragraphs 83, 84, and 85.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Define the boundaries in accordance with the NPPF 2012 and not to designate land which is unnecessary to be kept permanently open.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(page A3:437) '(1.1) 'The land between the urban edge to the west and south, and the outer ring road to the north and east, is relatively flat (Annex 1 - Evidence 5 - Topography), offering open views of the main urban area'. Agree that land is relatively flat and only the bunds constructed by Yorkshire Water (1997), Pilcher Homes, and North Yorkshire County Council Highways in 1988 disturb the flatness.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	In connection with (1.1) ...offering open views of the main urban area' (page A3:437), CYC employed Esther Priestley at full public appeal and she conceded to the Planning Inspector Drew that the views are fleeting at best between the trees and hedging in mid-winter. Photographs to show CYC is misrepresenting the truth. The actual view of this land is from the ring road taken on the 14th June 2021 from the entrance to the fire training station (see photographs provided). Examiners advised attendees of the Phase 1 hearing that they would be driving and walking to and around these proposed inner boundaries and Pilcher Homes is happy to grant access to our land North of Avon Drive to demonstrate that the obvious inner boundary using a physical feature that is likely to be permanent is the ring road.

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826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(page A3:437)- 1.1 'Across land in this location there are city wide views from the outer ring road and general long distance views from around Sheriff Hutton (Annex 1 – Evidence 13a – YCHCAA)'. Repeated in Criterion 2, 'Views of the Minster are widely held to be important in defining the special character and setting (Annex 1, Evidence 11a). The land is in the foreground of views of the Minster from higher ground from around Sheriff Hutton which show this landmark in the context of the compact city and its open countryside (Annex 1 – Evidence 13a – YCHCAA)'. Takes exception to this pure fabrication. Went Sherriff Hutton bank so the examiners wouldn't have to, and took photographs rom Cornborough Road on Sherriff Hutton bank at grid reference SE643667. Approximately 250 yards west of the village, Sheriff Hutton. Photograph zoomed in at 5x 3.1mb, one can see the minister in the centre of the horizon. No other houses or even the tallest buildings in the city are identifiable. Two storey houses on land north of Avon Drive would not be visible from this location.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	It is not noted in Annex 1 13a as a 'key view'. In contrast ST7 and ST14 do sit in key view lines and yet CYC seeks permission to justify exceptional circumstances to be released from the general extent of green belt. Most of the proposed strategic sites (dormitory settlements) are trying to allocate 6,000 plot in the middle of the green belt in contrast to para. 84 NPPF 2012 are definitely not channelling development to the inside or outside of the saved RSS belt. Analysis suggest that CYC'S blue line over land north of Avon Drive would take you to Terrington Bank 15 miles North. A photo is presented from that view, which concludes that at that distance the rounding off site north of Avon Drive would have no impact on the view of the historic city. Additional photo from Terrington Bank with 5x magnification. The Minister is just visible behind Sheriff Hutton bank. The general view of York is not impacted by any of the 20th century development in Huntington and nor would it be affected by further infill or rounding off.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(page A3:437) (1.1) 'The outer ring road is an important open approach for viewing and understanding the city (Annex 1, evidence 6). Whilst the landscaping along the A1237 in places provides a dense screen along certain sections of the outer ring road, ...'Agree with this point.

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826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(page A3:437) (1.1) '...this does not detract from the sense of openness and views between this are glimpsed.' This point is wrong. The strong screening in this area does detract from the sense of openness because it is not open. To drive through this section and that is the only option, is like driving through a green tunnel. There is no experience of an approach to an historic city. CYC writes, 'Maintaining open rural land in the foreground to this route allows an understanding of the compact city within original countryside context. The open landscape also extends north beyond the A1237 outer ring road. Where the buffer between the urban area and this important approach is at its narrowest this purpose becomes more important. In this location the only alternative recognisable boundary is the York Outer ring road and development up to this border should be resisted.' Cannot agree they are not maintaining openness where there is none. There is nothing to support their view that where the ring road is close to the city it makes open land in the foreground even more important. Indeed if this were the case then they would not be able to find exceptional circumstances to release ST8 or ST7 which lie between the York outer ring road and the city and are both open to the ring road.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Agree with the already established position in the phase 1 hearings that there is no defined inner boundary yet and that the identification of sites is simultaneous with the creation of the inner boundary and therefore exceptional circumstances are not required to release ST7 and ST8 both of which could reasonably be within the inner boundary. Anything beyond the YOOR is certainly not within the inner boundary. Additionally both of which would be more sustainable if they were contiguous extensions of the city. It is clear by their reference to the York outer ring road that in this location it is the physical feature that is readily recognisable and likely to be permanent.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(page A3:437) points 1.2 and 1.3, maintain our position that the land is not open and does not provide an experience of an historic city in a rural setting, i.e. it is not important for the 4th purpose of green belt.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Secretary of State wrote in appeal (APP/C2741/W16/3149489) that the site would (255): 'deliver a more successful urban edge than which presently exists and that the proposed landscape mound has the potential to more effectively screen views towards existing and proposed housing within a relatively short period'. It has also been assessed by the Secretary of State that (257) 'The proposed development would not harm the landscape character and setting of York.'
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Addressing allegation of coalescence In 2021 document CYC write, 'this land (is) highly sensitive in preventing coalescence... also of changing the perception of scale of the main urban area by creating a sense of bridging the outer ring road by continuous form. In keeping the land to the north and east of the proposed boundaries permanently open, the scale, identity and rural setting of the existing urban clusters would be maintained and their lateral coalescence would be prevented. If development were allowed within this open area it would result in the coalescence of these separate districts and a loss in their identity and rural setting'. However, this is in contrast to their submitted document in their green bet analyse that does not identify this boundary as significant for coalescence. By EX/CYC/18 Figure 7 which builds upon EX/CYC/18 Annex 1 11b concludes that this land is not necessary to be designated as green belt.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Feel that the paragraphs below from the public appeal APP/C2741/W/16/3149489 Land off Avon Drive, Huntington, York are helpful in addressing this boundary and the concept of coalescence in the eyes of the planning inspector.//126. The appraisal was prepared to aid in the identification of land which the Council believed should be kept permanently open [CD2.1, paragraph 1.1]. That is not to say that other land, not identified in the document, could not fulfil any Green Belt purpose, but the 2003 appraisal, updated in 2011 and again in 2013, was prepared in order to give, and does give, a clear indication of those areas of land which the Council considers perform a valuable Green Belt purpose. The appraisal and its updates, whilst not determinative, are clearly relevant to this that the appeal site has never been identified as falling within any of the categories of land said to contribute to Green Belt purposes around York within those assessments.// 127. Turning to each of the Green Belt purposes, in turn, there is no basis for concluding that the appeal site makes a material contribution to checking the unrestricted sprawl of a large built up area, or that the appeal scheme represents unrestricted sprawl of a large built up area. The appeal site adjoins built development to the south and west. To the north and north-east it is bounded by vegetation and the Ring Road. Accordingly, insofar as there is a risk of unrestricted sprawl in this part of York, it is checked by clear, permanent and substantial physical features. // 128. The appeal scheme reinforces those features. It proposes

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				more landscaping, including planting, mound and fence, to strengthen the boundary to the north and north-east. It sets no precedent for more development, whether on the opposite side of the Ring Road or in the fields to the south-east of this site. Report APP/C2741/W/16/3149489 Land off Avon Drive, Huntington, York. Can only conclude that CYC is wrong to now use ex-cyc-59d to suggest that Land north of Avon Drive should be within the green belt. The evidence that they created in ex_cyc_18 and the judgement provided by the appeal inspector acts as our evidence.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	The approach of adopting 'short-term' Green Belt boundaries in the initial version of the draft 2005 LP, placed on deposit in 1998, did not find favour with the Local Plan Inspector [and its progress was placed on hold. The Council published a third set of changes to the draft LP which introduced significant safeguarded land. However, a change of administration meant a reversal of that change, the removal of any safeguarded land, and a return to the very tightly drawn boundaries within the 1998 initial draft [xx of Mr Wood]. The examiners need not focus on not the potted history of York's attempt to cement the 1987 version of Green Belt instead entirely on the intent and purposes specified by the 2012 Framework and the government's desire to significantly increase the supply of housing through a plan led system. Pilcher Homes need not try to demonstrate an absence of green belt harm for the 'release' of the draft green belt and or argue that our land does not serve any of the five purposes. Instead it is incumbent upon the local authority to simultaneously identify its acute housing need and to set its boundaries for the first time in the light of paragraphs 83 to 85 of the 2012 framework.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	the proposed boundary 20 cannot provide the intended permanence in the long term required by para.83. Boundary 20 is not capable of enduring beyond the plan period (even if only 2037 green belt period). However, an inner boundary in this area should be capable of enduring at least 10 years beyond (EX/CYC/11a John Hobson QC advice) a 15 year plan approvable in 2021/ which is 2046/7. Boundary along the southern edge of the ring road could endure indefinitely. The raw water main is a no development zone via covenant so adds a 15m buffer against built mass inside of the ring road.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Boundary 20 does not promote the sustainable patterns of development espoused by para. 84. Clear that York and Huntington could take this opportunity to create a more satisfactory rounded off northern boundary. The land at this boundary provides an opportunity to provide sustainable development by channelling development towards urban areas inside the Green Belt boundary and to 'deliver a more successful urban edge than which presently exists' as judged by Inspector Drew.

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826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Framework gives structure to illustrate the gulf between the proposed boundaries which are still excessively tight (without safeguarded land) as per 1987, and the requirements of the 2012 framework. 'When defining boundaries local planning authorities should: ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development'. We believe that the identified need should come first and the allocations of sustainable, deliverable and viable sites can be made prior to defining the inner boundaries. As Inspector Wood noted in May 1998, the inner boundary could not endure and the urban fringe sites can deliver some sustainable developments in select locations without impact on urban sprawl or historic character of the city. The inner boundary 2021 cannot be all around contiguous with the existing settlement as it was the 1987/94/98 which created the 2005 (4th set of changes) which were not consulted upon or adopted in a local plan. May well be key views or flood plains, or protected habitats that retain tight boundaries in certain areas but CYC green belt analysis Figure 7 EX/CYC/18 diagram remains quite different to the 2021 proposed boundaries submitted.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	CYC did work in 2003/11/13 EX/CYC/18 and identified that land North of Avon Drive does not have any significant green belt function. The appeal inspector details the absence of urban sprawl created by this site in points 127 & 128 above. That evidence led to Figure 7 showing it is unnecessary to keep it permanently open. Therefore Boundary 20 is in contrast to the intent of the Framework. The same requirement to not include land which is unnecessary to keep permanently open exists as 139b) in the 2019 version. This requirement has significant weight because it is reinforced by its repetition in the current framework despite most green belts having already been defined.
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In earlier submissions many respondents have recommended that York has safeguarded land in their plan. It was excluded by the executive on political safe grounds against the recommendation of the officers (see Inspector Drew's comments on the 3rd set of changes). However, the point again required by the 2019 framework stands, and in a city with a proposed 82% greenbelt there will be nowhere to grow into without the use of exceptional circumstances in 5 year updates. It is inevitable that the current housing affordability will worsen with these proposed inner boundaries. It is also clear from the lead times on the large strategic sites that the lack of deliverability will exacerbate the problem because the current strategy is dependent on too few sites. The continued failure to deliver large sites will see housing delivery remain well below the target, let alone catch up on existing shortfall.

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826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	<p>The advice received by John Hobson QC in EX_CYC_11a enclosure 1; not only confirms his recommendation for a period of 10 years beyond the plan but crucially for all of the inner boundaries proposed clarifies that a plan without safeguarded land has a serious risk of being found unsound.</p> <p>'16. In my opinion if no safeguarded land is identified in the emerging Local Plan this would give rise to a serious risk of the Plan being found unsound. There would be a failure to identify how the longer term needs of the area could be met, and in particular a failure to indicate how those longer term needs could be met without encroaching into the Green Belt and eroding its boundaries.</p> <p>17. The only argument which it seems to me the Council could deploy to avoid this danger is to be able to demonstrate that there is sufficient land outside the Green Belt boundary which will be suitable for meeting the need for further development, and which is likely to be available when those needs arise. The important point is to be able to demonstrate that the Green Belt boundary will not be affected. I assume many authorities have adopted Local Plans without including safe guarded land. It would have been appropriate for them to do so in accordance with their local circumstances. However I am unaware of a situation comparable to the circumstances in York.'</p>
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	<p>Respondent considers CYC cannot satisfy the examiners that boundary 20 will not require alteration before 2037/8 as proposed. In reality these boundaries should be set to endure to 2046/7 which means having in mind another 10,000 houses on top of this proposed housing figure (inside or outside the green belt in line with para. 84). We have already raised the point that the boundaries like section 5 boundary 20 have not been clearly defined, using physical features that are readily recognisable and likely to be permanent. The varied hedge and fence line down the back of Avon Drive is not recognisable as the ring road nor as permanent. Also point out that as drawn in EX/CYC/59d part 2/S5/6 it does not follow the legal boundary which is to the south of the culverted drainage ditch and notches in and out around some unauthorised garden extensions.</p>
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	<p>Respondent does not consider document to be sound. Not positively prepared; it does not seek to deliver on the NPPF desire to significantly increase the supply of housing and provide a range of sites.</p>

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826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider document to be sound. The GB boundaries are too tight and cannot endure well beyond the plan period.
826	Pilcher Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider document to be sound. Not justified against the alternative options, it is not effective at delivering housing supply and it is not consistent with national policy.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Revised Boundary 3 at Wheldrake.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Not to wash over Knapton over in GB in direct opposition to NPPF (2012) Para. 86. which refers to the contribution a village makes to the openness of GB.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) Site should be allocated and has been proposed for green belt on political grounds to justify its non-allocation. However, it abuses green belt policy to unnecessarily define land as green belt that does not need to be kept permanently open as a method for refusal planning applications. The site is deliverable, sustainable and viable. Respondent agrees with the content of the DPP submission made for Mulgrave Properties Ltd. That developer has optioned much of the site and Pilcher Homes owns part of the land. All landowners would seek to deliver this medium sized site which is much needed to turn on housing supply and catch up on previous

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				undersupply without dependence on large strategic sites. A variety of sites is espoused by paragraph 47 (2012 NPPF) and this site can contribute towards the much needed 20% buffer in this authority with its persistent under delivery.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) Pilcher Homes was the most prolific developer in the village between 1966 and 2000 they do have records and plans from before the village came to be controlled by CYC. The respondent include images of Derwent Rural District plan of Wheldrake Drawing No. MC.72.5A which was approved by the Derwent Rural District Council Planning Committee in July 1970. (They request that it is added to the examination library and have an original 1/2500th copy in the likely event that CYC say they cannot find it.) This plan shows the obvious settlement shape used by the Derwent Rural District Council from the late 1960s onwards. The drainage ditch to the north of H28 was considered the village limit in the key. The hatched area was the proposed area for industry , which ST33 now proposes to replace those jobs with commuters.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) Respondent can additionally provide a drainage plan from the adopted 1966 structure plan. This plan detailed the long term infrastructure needs. That is why the deep large scale drainage below with numbered man holes is provided through the land above North Lane. Respondent do have invert levels to go with this 55 year old plan. The Yorkshire Water pumping station is still well placed on Low Well Lane to cope with H28. The access was deliberately designed to go through W. A. Hare s site along the road now known as Valley View. The residents don't like the idea of that despite it being agreed decades before they bought and effectively lobbied CYC. However, the officers know that the access can be delivered directly from North Lane instead and took it to the executive along with a number of other sustainable and deliverable sites.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) Respondent believes site H28 is not green belt today because it is was removed from the York green belt by the North Yorkshire County Council Post Modifications York Green Belt Local Plan 1995 (NYCC PMYGBLP 1995) which was adopted by NYCC in surrounding local authorities plans . Respondents have been advised that under their powers granted in the 1991 Planning and Compensation Act the adoption of these changes is determinative because they were not overruled by the Secretary of State and are equal to the adoption at a Local Plan level. Respondent asks the examiners give significant weight to NYCC

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				PMYGBLP 1995 in this context because it was consulted upon and adopted by NYCC for interim purposes and by neighbouring authorities adopted plans.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) If the examiners agree with the premise of giving significant weight to the NYCC PMYGBLP 1995, then after 1995 the revised boundaries were to be used to create the 1998 York draft plan (thrown out on too tight inner boundaries) and the 2005 draft plan with 4th set of changes which has been used for development control purposes ever since. Conclude that the site has not been in the green belt for 26 years and was restrained from development by non-allocation. The evidence for the removal is as follows in the extract from 2005 CYC local plan draft Appendix J. Respondent suggest it could then be reasoned that the boundary 3 is not sound and demonstrative of a positively prepared plan. CYC has not demonstrated exceptional circumstances to create new green belt in this village. Seeking to add the site 967 back in to the general extent of the green belt as prior to NYCC PMYGB Local Plan 1995 CYC is pursuing an avenue incompatible with Para 82 NPPF 2012. This policy specifically aims to resist this heavy handed approach.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) If the examiners dismiss the NYCC PMYGB Local Plan 1995 and its modifications as having very little weight then respondents make a case to show that this land ought not to be unnecessarily defined as green belt at this stage of the plan making process. And this land should have been the first and probably only allocation in this village.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) Land does not prevent urban sprawl which is fundamental aim of Green Belt policy. Inclusion in York Green Belt would not check unrestricted sprawl of large built up areas, it cannot prevent neighbouring towns from merging, it has no practical purpose in safeguarding the countryside from encroachment because it is surrounded by the village. It does not preserve the setting and special character of the City of York because this boundary is over 6 miles from the historic city. Respondent cannot agree with CYC (who stretch the 4th purpose) that it is necessary to be Green Belt to preserve the setting and special character of Wheldrake's Main Street. The absence of any meaningful development in the village for 30 years is not encouraging recycling of derelict land in the village or York because the housing supply is not

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				impacting the deliverability of York's brown field sites and the village itself has none. The land is optioned for housing development and will not come forward to assist with para. 81 purposes. If not green belt already then no exceptional circumstances offered to designate it as such. If the review of the GB boundary line is now due as part of the local plan process then to accord with para. 84 the boundary must endure beyond (or well beyond the plan period). This settlement is currently only bringing forward one site which has more faults than this one (in the eyes of the 1995 analysis) and would in its current ST33 format remove employment land from the village further damaging the sustainability of the settlement. Over 25 years from 2021 Wheldrake would have the tightest boundaries possible as proposed and would have to seek the release of GB at a 5 year interim review. That would not be a permanent boundary. Sustainable patterns of development encourage infill and rounding off to generate the most sustainable settlement shapes. H28 is clearly closer to services and the school than the proposed ST33 and should have come prior to that allocation. Respondent also contest that Wheldrake is at the edge of the outer boundary and development in this location accords with para. 84's inside or outside of the York GB.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) Respondent feels that the current plan strategy for defining GB must be at fault to move the GB boundary out for ST33. It extends on three sides in to open countryside. In contrast to see the obvious rounding off opportunity for H28 must be an error in the assessment or a reflection on the politics of site selection. It is not necessary to include H28 in the GB because it need not remain permanently open. The tepid CYC assessment acknowledges the more obvious boundary during sentencing. (see EX/CYC/59f, page A3:308, Boundary 3)
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) While respondent contested in the early nineties prior to the 1995 analysis that it may have been sensible then to make H28 safeguarded land they agreed with the Inspector Shepherd's assessment that it was (or should have been) removed from the green belt. Indeed it may be sensible for the site formerly known as H49 to be safeguarded land while H28 makes up the near term allocation. (CYC map included to illustrate point). Respondent believes that the loss of employment land is significant for the sustainability of the proposed strategic site ST33. The CYC map respondent included is not what is proposed in the current draft plan. The current draft plan has no safeguarded land because the executive would not support it. John Hobson QC explained to CYC that this omission is one of the reasons why this draft plan cannot make it to adoption.

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826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	(Wheldrake boundary 3/site H28) Finally in respondents analysis of Wheldrake boundary 3 against the 2012 framework, they note that CYC cannot satisfy themselves (or the examiners) that Green Belt boundaries will not need to be altered at the end of the development plan period. They believe that as soon as the standard methodology applies and market signals in this severely affected authority are enforced then the boundaries will require immediate changes to release deliverable sites. H28 is one of these Appendix 1 sites that would be quickly called up. They also believe that the clear boundary 3 using the clear physical feature would be the straight line across the top along the drainage ditch. Respondent recommend this modification to the examiners.
826	Pilcher Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes that the clear boundary 3 using the clear physical feature would be the straight line across the top along the drainage ditch. They recommend this modification to the examiners.
833	Private Individual	Whole Plan	-	The material described as evidence is not the evidence upon which the plan was based. There are significant flaws in the appraisals and justifications in any event. It ignores evidence that would have been proportionate had the correct process been employed. Failure to consider alternative approaches to the determination of the boundaries. Those engaged in the process cannot comment on the merits of the so-called evidence and cannot see what conclusions are drawn for the claimed assessment of that evidence. This does not constitute a fair process.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent does not consider the document to be sound. The GB proposals are not based on proportionate evidence.

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833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Proposals for GB boundaries are not evidence based. Respondent challenges every element of the LPA's submitted material that seeks to support an argument that the GB boundaries of the local plan are based on proportionate evidence.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Consultation is limited to the documents listed which does not include Topic Paper 1 itself - only the Addendum. It should be referenced in the local plan examination library if it remains a document in the process.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Boundaries of the local plan are principally those of the 1990 York GB local plan. This was not an evidenced based plan and was not subject to scrutiny on the basis of soundness. These boundaries were adopted for the 1998 local plan so that any public inquiry into the 1998 plan the objections raised in 1990 could not be re-run.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The evidence listed in Annex 1 is not evidence upon which the plan was based but material to achieve a post-submission justification.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The 1990 plan shows the radius at 6-miles from the city centre rather than the contrived version set out in Addendum which is not centred on the city centre but from the outer edge of the city's historic core, the walls. An amorphous area cannot be the centre of a radius.

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833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The material submitted and referred to in the annexes does not specify when it was assessed and that that assessment came before the boundaries were resolved and how that evidence then guided that decision.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	No attempt to define the extent and specificity of the material, such as in respect of OS maps and aerial photographs and no reason given as why this evidential material was not listed in the publication evidence base.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Existence of appropriate and proportionate evidence has been ignored or deliberately obfuscated by the LPA. The submitted material fails to establish conformity with the saved RSS policy.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The addendum intends to explain the methodology used for establishing the boundaries, which implies the methodology was employed before any boundaries were determined. At no point does it state a time when this methodology was applied to resolve the boundary proposal before the submission of the local plan.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There should be documentary evidence of the exercise of applying the methodology to the boundaries already established but not evidenced based. Respondent believes this is a deliberate ploy by the LPA to obfuscate the fact that the resolution of the boundaries as at publication date was not evidenced based and thereby to mislead the inspectors.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 5. The addendum focuses on an approach to issues relating to the inner boundary based around three concepts, which can be characterised as compactness, views from the outer ring road and the setting of rural villages in farmland setting - these concepts are not based on clear cut evidence but are presented by the LPA as self-evident truths.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 5. There is evidence that exists which has not been highlighted or sought by the LPA: The YCHCAA identifies that 4 key distant views can remain unaltered however the LPA in the Addendum state there are 26.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 5. There is evidence that exists which has not been highlighted or sought by the LPA: shortly after construction of outer ring road there were many inward views of the minster which have largely disappeared due to hedge planting and the management scheme employed. A reappraisal would have been appropriate if this was relevant evidence.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 5. There is evidence that exists which has not been highlighted or sought by the LPA: to prevent settlements beyond the inner core from losing rural village status, development must be directed to the inner core.
833	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 5. There is evidence that exists which has not been highlighted or sought by the LPA: villages beyond the 6-mile radius on the plan for the YGBLP consultation can be protected from development by open countryside policies and GB policy is not to be deployed for that purpose as explained by the secretary of state in respect of the first GB policy in 1980.

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833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 5. In terms of compactness, the term compact city is a prescriptive term in Town planning and relates to a form of development and not a geographic extent of a place.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 5. The OECD produced a comparative analysis of compact city policies in 2012 - it is a planning concept recognised on a world-wide scale. With respect to York, the extent of continuous urban form is so small it does not record as two decimal places as a %. It is incorrect to describe York as a compact city.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 6. The LPA do not identify or make clear the fact that all these neighbouring Authorities used in the 1990 plan but would have taken their lead from York as the principal LPA in this regard - further evidence proposals are no more than a reproduction of the 1990 proposals.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 6. No exercise was employed to underpin the boundary proposals by York, despite the inspector setting out the correct approach to start from the 6-mile radius point and seek the nearest appropriate feature to define the boundary.
833	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	LPA should have pointed out during the duty to cooperate process that the baseline for its boundary proposals were not evidenced based but merely a re-use of the 1990 YGBLP outcome.

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833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 6. para 6.16 and figure 10 provide an incorrect approach to the determination of the radius. policy interpretation should give words their ordinary meaning and radius is a figure which is based on a central point and ignores the NYCC plan of 1990.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Section 6. The LPA submitted that St. Sampson's square was the centre of the radius in the Strensall inquiry held in recent years and to which the LPA submitted a witness from Arup. the location only makes a minimal difference to the resulting radii by comparison to the two plans referred to in the last paragraph.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Evidence only relates to the justification and therefore only merits analysis. The primary focus of the respondents objections relate to whether there was an evidence base upon which the GB boundary proposals were based?
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is necessary for the LPA to demonstrate that evidence exists and that it was used as a basis to formulate the proposals.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent suggests the inspector clarifies whether the main element of the proposed boundaries is that which was resolved in the 1990 YGBLP process.

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833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent suggests the inspector ensures how and when the proposals were reviewed against the body of evidence set out in their justification and ensures it is clear how the proposals remained appropriate given they were not conceived upon an evidence base or against the overarching policy.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Annex does not specify the material covered under these items or when they were used in conjunction with formulating the proposals.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Annex does not make clear how this data might be applied to the issue of formulating GB boundaries or when such an exercise was undertaken and what its outcomes were for the process.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Annex does not make it clear how this data might be applied to the issues of formulating GB boundaries or when such an exercise was undertaken and what its outcome were for the process.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Annex does not address the issue of whether the assessment and analysis needed to be made both individually and cumulatively in respect of these reports.

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833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	No assessment appears to have been made prior to the plan being submitted with no evidence. In the absence of such an appraisal it seems impossible to demonstrate that the proposals comply with overarching policy.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not deem it an appropriate approach for a public authority to obfuscate evidence which is relevant to an EiP.
833	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Absence of reports to set out how the boundaries of the GB are established at any time during the time that the LPA has existed is significant. The document cannot be regarded as an evidence base for the plan as it has been rejected previously as part of the 1998 local plan process.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Duty to cooperate agreement currently in place between Selby DC and CYC is now out of date and needs to be re-visited.
841	Jennifer Hubbard Planning	Whole Plan	-	Local Plan has been prepared against the background of the Inspectors' various letters to the Council concerning the approach to determining green belt boundaries and the resulting potential unsoundness of the Plan. Neither of the current consultation proposals or published documents explain what approach has underpinned the draft Local Plan. Respondent does not believe the current consultation documents deal adequately with the concerns raised by the Inspectors'. Post-Brexit and post-Covid future needs to be reassessed and considered - these considerations do not feature in current consultation documents.

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841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Unclear why land with no special landscape characteristics or intervisibility with the built-up area of the city and lying 7+ miles from the city centre needs to be kept permanently open, whereas other land with very similar characteristics but lying outside a proposed green belt boundary drawn much closer to the city centre does not.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Documents EX/CYC/59 and 59(a)-(g) cannot be part of the evidence base underpinning the draft Plan since they are all new post-submission documents. Respondent believes that the additional investigations embodied in these documents will not result in the same green belt boundaries as defined at an earlier date in the submission draft Plan. Main purpose of the York Green Belt is to protect the character and setting of the historic city but nowhere has the Council ever articulated precisely what differentiates York and its environs from many other Cathedral cities.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There has been a desire to restrict the amount of new development in the Local Plan, to pursue as tight an inner boundary as possible and to consistently ignore advice from Officers. The current version of the Plan is a consequence of 'horse trading between the political parties' as housing requirement figures have fluctuated, which is not the outcome of a rational appraisal of options. If the green belt boundaries are adopted as currently proposed, it seems inevitable that the Local Plan will fail to provide for an appropriate level of housing development with potential impacts on those adjacent areas which, for many decades, have accommodated housing needs arising in York. Particularly true in the northern parts of Selby District and, in the East Riding of Yorkshire, in Pocklington.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The NPPF does not offer a new settlement 'punched' into the general extent of the green belt as an option for sustainable development. Respondent does not understand how if Site ST15 is carried forward, will provide 'ways in which the impact of removing land from the green belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land (Framework Paragraph 138).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	"6-mile-wide green belt" - No report, minute of other Council decision which explains the rationale for this and in particular why a new definition has been adopted which differs from that previously used. The Council ignores the YGBLP Inspector's view that, in establishing the outer boundary of the green belt, the correct approach was "first to find recognisable and durable boundaries that approximate as closely as possible to an exact 6-mile radius, and only to vary from this for reasons of practicality or for reasons which directly relate to the purposes of the green belt. The justification for extending the green belt up to and beyond Wheldrake is that it is essential for the land to remain permanently open, this simply isn't the case otherwise the general extent of the green belt would be set at 6 ½ or 7+ miles from the city centre.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Boundary justifications in the Annexes to the Topic Paper do not flow inextricably, the information presented does not clearly identify or explain which characteristics of the city and its surroundings result in the "specialness" which requires the protection of green belt.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In relation to the inner boundary – the very tight green belt boundaries proposed round, e.g., number of school and other building complexes, most of which do not follow any physical features, if adopted, would require site owners to demonstrate very special circumstances to justify even the smallest of new developments, which is totally inappropriate and disproportionate. Long distance view from Crayke to York City Centre is noted by the Council, there is no explanation of the relevance of this view to the definition of green belt boundaries or how peripheral development round York might compromise this view.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent endorses the comments made by SID 833 in relation to the Green Belt methodology.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The 2000 Sheffield University Study (in relation to the Green Belt) has been ignored by the Council with no explanation of why the Council has rejected its findings on the potential to develop land adjacent to the existing built up edge of the City without causing harm to the character and setting of York, but bringing positive visual and environmental benefits.
841	Jennifer Hubbard Planning	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC_29 York Economic Outlook is dated December 2019 and so is already out of date. An accurate and up to date picture of economic development requirements is particularly important since the current green belt proposals do not include safeguarded land. Respondent believes that the Plan cannot be adopted until all the development needs of the city have been properly addressed.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Campus East outline permission was subject to a Secretary of State decision, following a public inquiry where the impacts of the proposed development on the general extent of the York Green Belt were widely explored. Outline permission was granted without any of the campus needing to serve Green Belt purposes, and this permission remains extant. The Green Belt boundaries proposed around Campus East intrude into the area for which outline planning permission exists for the development of a university campus and for which an approved master plan is in place. The Green Belt boundaries should at the very least acknowledge this lawful use by excluding it from the Green Belt. Landscape notations in the master plan are adequate to confine the location of development.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Green Belt boundaries proposed for Campus East would be both unsound and not be in conformity with policy in NPPF 2012 para. 85 by not 'defining boundaries clearly using physical features that are readily recognisable and likely to be permanent' since the University is entitled to implement the planning permission granted for the campus and this may alter boundaries currently proposed by the Council.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Campus East, eastern boundary (PM85) should be amended to follow the northern lake side and the built edge of the consented development for consistency with the Green Belt methodology (supplied as plan 5).
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Green Belt boundaries for Campus East should follow the outside line of the consented site for the eastern side and use field boundaries on the western side (identified in plan 3 and plan 8 supplied). The approved masterplan shows the land outside of the central 65 hectares identified for development as open landscape, which itself controls its use and openness.
849	University of York	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The quantum and location of land which is required to be excluded from the Green Belt in order to meet the foreseeable expansion needs of the University during the extended local plan period to 2038. The University has repeatedly presented detailed and cogent evidence to support its position – the Council's position, by contrast, is demonstrably not evidence based and therefore is not justified
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Campus East outline permission was subject to a Secretary of State decision, following a public inquiry where the impacts of the proposed development on the general extent of the York Green Belt were widely explored. Outline permission was granted without any of the campus needing to serve Green Belt purposes, and this permission remains extant. The Green Belt boundaries proposed around Campus East intrude into the area for which outline planning permission exists for the development of a university campus and for which an approved master plan is in place. The Green Belt boundaries should at the very least acknowledge this lawful use by excluding it from the Green Belt. Landscape notations in the master plan are adequate to confine the location of development.

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849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Green Belt boundaries proposed for Campus East would be both unsound and not be in conformity with policy in NPPF 2012 para. 85 by not 'defining boundaries clearly using physical features that are readily recognisable and likely to be permanent' since the University is entitled to implement the planning permission granted for the campus and this may alter boundaries currently proposed by the Council.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Campus East western boundary (PM86) should follow the edge of the park and ride, Lakeside Way and the built indoor sports provision (supplied as plan 6).
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para 10.32 identifies sufficient land has been identified to meet future needs and therefore that the resultant Green Belt boundaries offer permanence to 2038. However, no evidence whatsoever to support this conclusion has been forthcoming from the Council. The Council has been provided with clear evidence that this area is insufficient and has not engaged; for example, a draft Statement of Common Ground was submitted to the Council by the University in September 2020. To date, no response to this document has been received.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para 4.53 refers to a 0.5 growth in student numbers from 5,300 to over 16,000 over years based on the University's 2017 representations as a measure of the demand for expansion of the physical estate. This growth equates to a 4.1 % annual increase in students and not the 0.5%
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para 7.25 states that the capacity of existing higher education sites has been assessed and refers to potential for further intensification/ redevelopment for the University at Campus West subject to not exceeding the 23% footprint of total site area. But Campus west has already reached 23% footprint so development potential is restricted to building on car parks or redeveloping existing buildings to a greater height. In 2018 and around 50% of the campus landscape was heritage listed Grade. A University Brief June 2019 indicates that an earlier Council policy restricts building heights to mature tree canopy height. These constraints severely restrict development potential on this campus

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para 10.31 acknowledges the remaining capacity on Campus East (of around 9.0ha) but accepts in para 4.52 that the University will not be able to continue to grow beyond 2023 without an expansion of the existing campus east. Uncertainties related to the global pandemic will have set this date back but it will be well within this decade and well before the end of the plan period
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The location of ST27 and the boundary around it does not correctly interpret and apply the requirements of NPPF 2012 para 85 in that CYC has not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	CYC's draft Plan in 2014 included the 26ha allocation to the south of Campus East, the whole of which would be available for development. In addition, a 30ha landscape buffer to the south was allocated and retained in Green Belt. Further progress on the Plan led to the decision of the Council to relocate the allocation to the east and reduce its size to 21 ha. However, the requirement for a wide landscape buffer to the A64 this time to be secured within the allocation reduced the developable area to around a mere 13ha (i.e. half the size of the evidenced need). CYC did not supply evidence to rebut the University's detailed growth projections or justify the substantially reduced size of draft allocation.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	A 13ha developable area for Campus East extension would not meet predicted growth within the plan period and would severely inhibit the University's ability to contribute to local, regional and national economic strategies, as is expected it should in paragraph 7.14 of the Explanation to Policy ED3 Campus East.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	NPPF 2012 para. 85, requires the setting of the Green Belt boundaries must first take into account demands for meeting identified requirements for sustainable development, To adopt boundaries which would deliberately constrain the growth of one of the city's key economic drivers would clearly be contrary to draft policy SS2.

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849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The University's annual review of the size of its student body (FTEs) provides evidence of sustained growth in its numbers over the last several years as shown in EX/OTH/6. This has been updated (supplied as Appendix B) and the pandemic has not impacted conclusions. It identifies average growth in student numbers of 4% over the last 10 years.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Based on modelling growth of 0.5 to 4.0 % to 2038 (to allow Green Belt permanence), demand for expansion space ranges from 10 ha to 112ha. If growth is at 1.25% or above 26 ha will be required before 2038. The minimum likely growth is estimated to be 1.25% and higher growth is 'foreseeable'. The impact of global pandemic is not likely to impact these growth assumptions beyond an 18 month 'hiatus' meaning the expansion area is still likely to be used up by the end of the plan period.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The University has grown in reputation and size between 2009 and 2018 it has grown by 40% to over 18,000 students (2018/19) and makes a wider economic contribution of £1.8bn each year. In order to sustain this economic impact, and to ensure the University remains successful, further growth will be required. The University's design principle is that each cluster remaining to be developed on Campus East and all clusters on the whole of ST27 would have a mix of residential, academic and knowledge exchange development.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The rising demand for commercial knowledge led business use is less reliable in being accurately predicted. The current outline planning permission (granted in 2007) for Campus East allows for 25ha of such uses within the 65ha allocated for development from the total 116ha area. However, the Global Economic Recession meant that take-up amongst such use was initially very low. Draft policy ED3 proposes that the 25ha permitted is spread across Campus East and the extension area. Instead it is proposed a maximum of 20,000sqm on Campus East and 26,000sqm should be permitted on the extension site, but transferable between each area if required. Consequent revisions should be made to policy ED3 and addressed in a new ED3a introduced related to the Campus East expansion to accommodate this.

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849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The education employment projections in the Oxford Economics Paper EX/CYC/29 are based on available local level data for York, past changes in that data applied to national level sectoral forecasts. This process cannot possibly pick up fine-grained changes or influences on York's economy. Oxford Economics modelling of employment change in the education sector to 2038 cannot possibly have taken account of likely ranges of growth with a significant expansion of employment (several thousand extra jobs in the sector) not an erroneous 1% decline Oxford Economics forecast.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	It is very unlikely the Oxford Economics Paper EX/CYC/29 forecasts take account of the potential wider impacts from the growth in the University on the local economy including productivity, student spend and R&D impacts. Nicol Economics assessment (is included as Appendix C) identifies a likely expansion of people employed in the education sector A minimum to foreseeable level of growth in student numbers (1.25% - 4% pa growth) could mean an increase of from 1,200 up to 2,100 in people employed in the education sector in York between 2017 and 2038, plus a similar number elsewhere in the economy.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	A master planning exercise by MAKE Architects (2018) which reviews both the 21 ha draft allocation (less the landscape buffer to A64) and the 26ha site proposed by the University and illustrates an appropriate range of university uses, suggests building heights and identifies a resultant floorspace for each site (extracts supplied). The master planning exercise shows the floorspace potential for ST27 as proposed by the Council is estimated at 70,550sqm at most, with the 26ha site promoted by the University estimated at 158,150sqm.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	The master planning exercise by MAKE Architects (2018) also reviewed the capacity remaining on Campus East, which was estimated as 75,750sqm at that stage. However, two reserved matters planning applications, for an energy centre and an artificial intelligence research centre, have been approved since that time.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	A 56ha site, the whole 26ha the university promoted plus a 30 ha landscape buffer (which could be subject to an appropriate safeguarding policy). By also removing the landscape buffer area from the Green Belt, long term growth requirements, which it is not possible to predict at this time, could be reviewed as the local plan itself is reviewed. The openness of the area adjacent to the A64 and the retention of its rural character would be achieved via the development brief and master plan, so that the current 30ha landscape area need not be included in Green Belt.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Introduction of a new Policy EC3a relates to Campus East expansion is suggested to address the expanded area and define the buffer through masterplanning with further modifications to SS22 to reflect this are proposed (set out in full in Appendix D supplied).
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Subject to the case being made for all of the ST27 land being brought out of Green Belt, the University will purchase the land from Halifax Estates. The University has a pre-emptive agreement on the ST27 and also adjoining land to the south and west, which makes it available for University occupation.
849	University of York	Section 03 Spatial Strategy	Policies Map (Green Belt)	Within the landscape buffer, generous planted margins will be required to both A64 and the western boundary in order to protect the setting of the city, and the visual amenity of the wider Green Belt. However, if removed from Green Belt there would be opportunity to utilise the landscape buffer for University facilities such as a large attenuation lake suitable for active sport, with accompanying facilities which may not be compatible with Green Belt policy.
850	Highways England	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Helpful that consultation clarifies end year of the Plan as 2032/33
850	Highways England	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Notes the housing requirement of 822dpa, including uplift for shortfall in provision 2012-2017 and states that given that 4,174 dwellings are to be delivered as part of strategic sites beyond the plan period, an approach to how the strategic mitigation for these sites is to be identified also needs to be agreed between CYC and HE to avoid significant risk being transferred to HE beyond the Plan period.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
850	Highways England	Section 05 Housing	H1 Housing Allocations	The updated Housing supply Trajectory shows a windfall allowance of 182 dpa whilst the proposed modification PM55 shows a windfall allowance of 169dpa - please clarify.
850	Highways England	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	When compared against HE uncertainty log (Nov 2020) allocated site total units in Annex 7 show a number of discrepancies which should be clarified, including approved number of dwellings where sites have planning permission. This includes sites H1, ST5, ST16, ST22 and ST32. Question as to why ST22 (under construction but not fully completed) has been omitted from the housing trajectory.
850	Highways England	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	When compared against HE uncertainty log (Nov 2020), phasing to 2036 shows significant differences, likely to impact on scale and timing of schemes required to mitigate the impact of the Plan. Advise to provide HE with most up to date uncertainty log for development in the Plan period as well as delivery of housing on LP sites between 2019 and 2021, and in advance of rerunning SATURN and Aimsun models as part of the LP Impact Study.
863	Private Individual	Section 05 Housing	Site Allocation ST13	Objection to ST33 in respect of the number of dwellings proposed. Proposal for ST33 is totally out of keeping within the village of Wheldrake which has already been developed beyond the capacity its infrastructure is able to cope. Residents of the village acknowledge the need for additional housing, but the proposal to build 147 dwellings is unnecessary and way above the magnitude that the village can cope with - development must be restricted to the area contained within the brownfield land. The roads in Wheldrake are unsuitable for the increase in traffic that would follow with such large-scale developments such as in Escrick and Elvington.
863	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	If ST33 progresses further, it would result in an incursion of the established Green Belt and a loss of agricultural land at a time where this is a world shortage of food products. Priority of housebuilding must be confined to brownfield land.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
863	Private Individual	Section 05 Housing	Site Allocation ST33	Opportunity for the proposed Garden Village to remove the need to over develop the adjoining land close to villages, whilst ensuring that some limited house building can be planned without destroying their character and changing the whole nature of the surrounding villages.
863	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Essential that the Local Plan is established without the need to concrete over unnecessary parts of the Green Belt and to ensure that every parcel of brownfield land is developed before any consideration is given to a single square metre of the green belt is exploited.
866	Mulgrave Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The revised methodology aligns more closely with the purposes of including land within the GB. Supports the settlement limits and GB boundary as proposed within the emerging Local Plan.
866	Mulgrave Developments Ltd	Section 05 Housing	Site Allocation H38	Respondent considers the document to be sound. Supports the draft allocation of the site H38 within the emerging local plan. Site does not materially fulfil any of the purposes of the GB around York, when reassessed using the Council's methodology.
866	Mulgrave Developments Ltd	Section 03 Spatial Strategy	Site Allocation H38	Site H38. With respect to Urban Sprawl, Rufforth is a village of modest scale and separated from York. The site will not affect the perception of a compact city in a rural hinterland.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
866	Mulgrave Developments Ltd	Section 03 Spatial Strategy	Site Allocation H38	Site H38. With respect to Urban Sprawl, there is an existing dwelling to the immediate north of the site, and a cluster of houses to the south, as well as existing urban development to the west. Given the clear physical boundaries the allocation will not result in unrestricted sprawl.
866	Mulgrave Developments Ltd	Section 05 Housing	Site Allocation H38	Site H38. With respect to encroachment, the site is completely enclosed by an established hedgerow boundaries. The boundaries restrict views into and out of the site. It does not exhibit the characteristics one would other associate with being rural, primarily given its scale and its proximity to the village.
866	Mulgrave Developments Ltd	Section 03 Spatial Strategy	Site Allocation H38	Site H38. With respect to compactness, Rufforth is not a town and situated some distance away from the city of York. The site does not intrude on the strays, Ings and Green wedges which are so important to the character of York or affect the open countryside which surrounds the city.
866	Mulgrave Developments Ltd	Section 03 Spatial Strategy	Site Allocation H38	Site H38. With respect to landmark monuments, site does not need to remain open to aid the appreciation of Rufforth, as a village, or the city of York. No other heritage assets in the vicinity of the site. The site is not visible from the outer ring road.
866	Mulgrave Developments Ltd	Section 03 Spatial Strategy	Site Allocation H38	Site H38. With respect to landscape setting, there is no perceptible relationship between the two within the intervening land of Rufforth and York. It is well enclosed and contained by the existing established hedge boundary.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
866	Mulgrave Developments Ltd	Section 03 Spatial Strategy	Site Allocation H38	Site H38. The site remains a suitable housing allocation and does not need to be kept permanently open.
866	Mulgrave Developments Ltd	Section 05 Housing	H1 Housing Allocations	Reiterate the importance of the site's allocation in ensuring that the council are able to achieve the delivery trajectory outlined within the SHLAA Update, and in meeting the housing requirement. The site will contribute approximately 33 dwellings within the plan period.
866	Mulgrave Developments Ltd	Section 05 Housing	H1 Housing Allocations	CYC/43a and CYC/56 serve to underline the importance of the site in enabling the council to deliver the requisite housing within the plan period. The council have accepted that H38 is available and that the site is suitable for residential development.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. Objects to PM97 as this concerns the site of interest, H26. Rationale overlaps with other annexes.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	PM 97 should be omitted from the plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to the Housing Supply Update on the grounds that it omits site H26.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. The revised methodology is not sound in respect of the site H26 and the OAN calculation of housing requirement does not meet the need for the city.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to PM97. There is no logic to the revised GB boundary which runs through half of the existing school building. This is not a clear boundary and does not follow defined physical features.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes, on behalf of their client, that site H26 should be included within the emerging Local Plan as a housing allocation or identified as safeguarded land in anticipation of the review. The site does not fulfil any of the purposes of GB and its allocation within the plan could be achieved without undermining or compromising the role and function of the York GB.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to site H26, PM97, the allocation of this site would do no more than fill a gap in between existing development. The city will retain its compact form.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to site H26, PM97, there are no landmark monuments within the vicinity of the site. Views into York are obscured by existing development and vegetation.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to site H26, PM97, the site lies a considerable distance from York and remains discreet and separate from the wider landscape that surrounds the city and the village itself.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to site H26, PM97, the development of the site would not give rise to the sprawl of a large built-up area.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to site H26, PM97, the site does not have the characteristics of land that could be deemed countryside. H26 is heavily influenced by urban development and cannot sensibly be regarded as being part of the wider countryside and thus not result in encroachment if development were to occur.
867	Yorvik Homes	Section 05 Housing	H1 Housing Allocations	Respondent believes site H26 should be reinstated as an allocation within emerging local plan to cater for the increase in housing requirement that is required in order to make the plan sound.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	PM97 is omitted from the plan and the boundary reinstated along the existing field boundary which encloses the school playing field.
867	Yorvik Homes	Whole Plan	-	Respondent does not consider the document to be sound.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound although has no objection to the plans acknowledgment in para 5.7 that there are no towns within York authority area and so the need to assess whether land should be kept permanently open to prevent neighbouring towns from merging does not arise.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to purpose 5, respondent does not consider the new criteria to determine open land against only the first, third and fourth purposes as sound.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Just because land has not been built on does not make it important to the understanding of the special character of an area

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867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent finds it difficult to understand how an assessment of every heritage asset, will ensure the fourth purpose has been duly considered.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent finds it difficult to understand why the significance of historic gardens is considered under this criterion - exemplifies a general confusion and conflation as to what is and what is not historic.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is unclear as to how all three criteria have the potential to render the whole of the York authority area relevant to the fourth purpose. Not all land around a settlement will be important to this purpose of including land within the GB.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The proximity of the urban area is not itself linked to sprawl or the presence of existing buildings/ farmsteads. By this logic, any existing buildings would need including within the GB to reduce the chance of sprawl occurring, which the respondent believes lacks logic.
867	Yorvik Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to purpose 3, it remains unclear how this as an assessment would aid one's understanding of whether or not land needs safeguarding from encroachment or what is truly countryside as opposed to land that has been influenced by urban development.

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867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Overall the respondent considers the emerging plan has not been positively prepared, the land included within the GB has not been justified, it will not be effective and it is not consistent with national policy.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. Respondent has repeatedly objected to the housing requirement used within the PDLP (2018) and have outlined the reasons why it fails to meet the housing needs of the city.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing requirement has been calculated using OAN process. The standard method process currently prevails the approach to calculating housing requirement.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Para 33 of NPPF, indicates that relevant strategic policies will need updating if their applicable local housing need figure has changed. LPAs are likely to require earlier reviews and so the council will almost definitely have to change their local housing figure once the standard method is used as part of a local plan review.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are a number of deficiencies in the city of York Housing needs update which mean that the 822 dwellings per annum which makes the plan unsound. The housing requirement and evidence base are not justified, the plan will not be effective, it has not been positively prepared and the approach adopted does not reflect national policy.

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867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing requirement should be recalculated and should reflect a figure similar to that produced by using the standard method.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. rationale and justification overlaps with previous responses.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Issues with the OAN process of housing allocation - standard method is required.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Inevitable that with the transition from the OAN process of housing allocation, further alterations of the GB boundary will follow.
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement and evidence base are not justified and the local plan will not be effective in meeting the city's needs. It has not been positively prepared and the approach adopted does not reflect national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
867	Yorvik Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing requirement should be recalculated and should reflect a figure similar to that produced by using the standard method.
872	Jeffrey Stern	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent regards the document as sound with approval of the proposed changes to the Green Belt as they address Heslington and its area (PM87)
872	Jeffrey Stern	Whole Plan	-	Respondent regards the document as sound although does not give any significant justification. However rationale provided in the 'modifications' section relates to the soundness of the document. This rationale describes the respondents approval of the proposed changes to the Green Belt as they address Heslington and its area (PM86)
878	Sarah Mills	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Attempts have been made to prepare the plan positively and attempts made to justify the decisions made, but decisions and reasons appear flawed. Therefore, the plan will not be effective in providing appropriate housing for residents or meeting its own spatial principles.
878	Sarah Mills	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM52 Policy SS1 p26: Approval of the inclusion of “directing development to the most sustainable locations” and “ensuring accessibility to sustainable modes of transport and a range of services”

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
878	Sarah Mills	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM52 Policy SS1 p26: Disagree with removal of “where viable and deliverable, the re-use of previously developed land will be phased first” – the retention of this would assist the plan in meeting of the previous six principles set out in Policy SS1.
878	Sarah Mills	Section 05 Housing	H1 Housing Allocations	PM62 Policy H1 p91 – Disagree with the removal of this paragraph as housing development should be phased in the city with the use of brownfield sites being prioritised
878	Sarah Mills	Section 05 Housing	H1 Housing Allocations	PM63 Policy H1 p92: Disagree with the number of proposed small housing developments located on pickets of green/rural land when the city has access to other brownfield sites. Council has not fully explored other land for housing that already has good access to infrastructure. Council has not taken into account the changed retail landscape as a result of COVID-19. Preferable to use other larger sites around the city rather than overwhelm existing areas with increased traffic congestion and pollution. For example, ST15 could better accommodate the 76 houses planned to overwhelm the country lane of Eastfield Lane, Dunnington
878	Sarah Mills	Whole Plan	-	Greater attempts to preserve green space in and around the city by ensuring building on green space carries a condition to retain 33% of land as open space
878	Sarah Mills	Section 05 Housing	H1 Housing Allocations	Should be a ‘condition to build’ that states development can only be built on identified green space land once all other brownfield sites and previously developed land have been exhausted in order for the plan to claim to “conserve and enhance York’s historic and natural environment”

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
878	Sarah Mills	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Amendment of PM54 Policy SS1 para 3.3 p27: Changing of housing target from 790 p/a to 820 does not address the housing issue appropriately. Local Plan should work to prevent family homes and starter homes across the city from laying empty and being used as holiday accommodation. Local Plan should attempt to address this by ensuring a significant number of the properties built under the plan are affordable by York residents, based on average earnings – would involve a number of properties priced at <£200,000.
879	Private Individual	Whole Plan	-	Respondent does not consider the document to be sound. It has been positively prepared but not all parts of the plan are justified and effective. Not consistent with national policy.
879	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM52 Policy SS1 p26: Approval of the inclusion of “directing development to the most sustainable locations” and “ensuring accessibility to sustainable modes of transport and a range of services”
879	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM52 Policy SS1 p26: Disagree with removal of “where viable and deliverable, the re-use of previously developed land will be phased first” – the retention of this would assist the plan in meeting of the previous six principles.
879	Private Individual	Section 05 Housing	H1 Housing Allocations	PM62 Policy H1 p91 – Disagree with the removal of this paragraph as housing development should be phased in the city with the use of brownfield sites being prioritised

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
879	Private Individual	Section 05 Housing	H1 Housing Allocations	PM63 Policy H1 p92: Disagree with the number of proposed small housing developments located on pickets of green/rural land when the city has access to other brownfield sites. Council has not fully explored other land for housing that already has good access to infrastructure. Council has not taken into account the changed retail landscape as a result of COVID-19. Preferable to use other larger sites around the city rather than overwhelm existing areas with increased traffic congestion and pollution. For example, ST15 could better accommodate the 76 houses planned to overwhelm the country lane of Eastfield Lane, Dunnington
879	Private Individual	Whole Plan	-	Greater attempts to preserve green space in and around the city by ensuring building on green space carries a condition to retain 33% of land as open space
879	Private Individual	Whole Plan	-	Should be a 'condition to build' that states development can only be built on identified green space land once all other brownfield sites and previously developed land have been exhausted in order for the plan to claim to "conserve and enhance York's historic and natural environment"
879	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM54 Policy SS1 para 3.3 p27: Changing of housing target from 790 p/a to 820 does not address the housing issue appropriately. Local Plan should work to prevent family homes and starter homes across the city from laying empty and being used as holiday accommodation. Local Plan should attempt to address this by ensuring a significant number of the properties built under the plan are affordable by York residents, based on average earnings – would involve a number of properties priced at <£200,000.
879	Private Individual	Whole Plan	-	CYC have not properly consulted the residents or Parish Council of Elvington.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
879	Private Individual	Section 03 Spatial Strategy	Site Allocation H39	Despite objections to the development and removal of Site H39 from the Green Belt, CYC have persisted to put it forward purely to achieve dwelling numbers without addressing the arguments against development. CYC describing the main residential area to the West of the village as the “outlying Business Park’ highlights a lack of knowledge and fails to take account of the ‘on the ground’ and social geography.
879	Private Individual	Whole Plan	-	The document is not positively prepared – Other more suitable sites which offer deliverable houses and less disruption have been proposed by the residents of Elvington have been rejected by CYC. The plans impact on the lives and welfare of the residents of Elvington, as well as the appearance and environment of the village, has not been considered in the preparation of the plan.
879	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	The document is not consistent with National Policy – The proposal to remove SP1 from Green Belt elsewhere in the plan does not comply with the NPPF, specifically “Policy E: Traveller sites in Green Belt” of the planning policy for Traveller sites.
879	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Green Belt for Elvington should be extended to cover the area for The Conifers development through to Sutton Bridge
879	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site H39 should not be removed from the Green Belt as it would spoil the rural nature of Church Lane and would render Becksides more of a large and disproportionately sized housing estate not in keeping with the rest of the village

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
879	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	The village is not opposed to appropriate development and supports Site H26's removal from the Green Belt for potential development of under-represented family homes in the village.
879	Private Individual	Section 03 Spatial Strategy	Site Allocation SP1	SP1 to remain in the Green Belt as it is not compliant with National Planning Policy
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	PM75. Land south of the southern school buildings is unjustifiably proposed to be within GB despite it serving no GB purposes. Respondent argues the land is not countryside as it is part of a busy and evolving campus where buildings and sports facilities need to meet changing demands such as increased school role numbers, energy conservation standards and artificial sports pitches.
883	St Peter's School	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	PM75. The school's development is confined within its boundaries. major flood bank campus would not affect the setting and special character of the city.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	PM75. Development on the school campus would not affect the setting and special character of the city. River corridor to the south performs this function, particularly giving views towards the minster.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	There is no council evidence base for the school's requirements so that the proposed GB boundary is contrary to para 85. The document does not pass any of the tests of soundness.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	The GB boundary should be along the northern edge of the flood bank to the south of the School's southern buildings and between sports pitches on the western edge.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	Proposed GB boundary around St Peter's School southern campus does not correctly interpret and apply the requirements of NPPF para 85. CYC has included land which is not necessary to keep permanently open; has not defined boundaries clearly (using physical features); not satisfied themselves that the GB boundary will not need to be altered at the end of the plan period; not ensured consistency with the local plan strategy.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	The council has disregarded its obligation to make an evidence based assessment for meeting identified requirements for sustainable development for the school within the plan period.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	The council not taken into consideration the likeliness of school buildings not being fit for purpose and thus the need for replacement - the GB boundary hugs the southern edge of the buildings.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	The campus is patently not countryside, it is a busy institution with over 1200 students and buildings and sports pitches to serve the school community.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	Removing part of the existing site and place it into the GB inhibits its abilities to meet its needs for sustainable development.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	CYC ignores the local plan policy ED6 which supports new and enhanced facilities so that there is inconsistency with the local plan strategy.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	The proposed GB boundary unreasonably inhibits the scope of these GB schools to cater for legitimate growth and enhancement, thus pressure to revise the GB boundaries to allow such growth will become immediate.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	The flood bank offers itself as a really strong physical feature that is recognisable and likely to be permanent compared to the 'doily effect' of the Council's proposed boundary.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:204) Respondent does not consider the document to be sound with respect to the proposed modification PM75: Land serves no GB purpose.
883	St Peter's School	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound with respect to the proposed modification PM75. Document identifies CYC/59h as the supporting evidence but there is overlap and rationale relates to 883i CYC/59 in the spreadsheet.
888	Private Individual	Whole Plan	-	Respondent emphasises the need for the York Local Plan to take a greater consideration into the climate emergency and reiterates the proposed modifications should be rejected and the local plan withdrawn.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent has issues with the methodology of the GB boundaries and believes there is inadequate justification for the inclusion of land west of ST8 within the Green Belt.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to the boundary of ST8. Does not believe this is the most appropriate long-term boundary for the plan period and beyond. The GB Addendum does not provide a fully justified reasoning for the resultant inner GB boundaries.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst ST8 is supported, defining land to the west and north within the GB is inappropriate and will not affect the issue of compactness. Respondent identifies the possibility of incorporating an adequate landscape buffer adjacent to the outer ring road
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST8 aligns with the council's strategic aims of channelling development towards urban areas and promoting sustainable patterns of development. This will form a wholly logical extension to the eastern urban edge of York, which would be contained within the outer ring road.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent criticises the methodology further with respect to a lack of consideration of the potential development put forward and the potential for an alternative boundary which allows for appropriate development to be accommodated in the longer term. No consideration put forward by interested parties. Such proposals will maintain the 'containment' of the urban area and openness will not be compromised.
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent disagrees with the councils position on not designating safeguarded land. Required to provide a degree of permanence to the Gb boundary and avoid the need for future reviews.
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The timescale of the York plan and the time of delivery is of concern. 4 years into the land period and so the five year buffer is dwindling and will be even less by the time the plan is adopted. there is greater justification to identify safeguarded land for beyond 2038.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes more areas should be designated as safeguarded land.
891	Redrow Homes	Whole Plan	-	Respondent recommends that upon adoption a review of the local plan is immediately triggered.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	The outer ring road identified in Annex 1 is as a 'main road approach' however the respondent disagrees as no long distance views are interrupted by ST8 or land to the north or west. There are a number of panoramic, dynamic, general and key views, including a selection of views from the outer ring road.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent opposes the allocation of ST8 as a 'Residential Urban Extension' as it is proposed to extend north of Monks Cross business park and remain separate from the existing Huntington residential edge. as a result a thin strip of land between the existing and proposed areas of land emerges which as no GB function. A more appropriate, sustainable option would be to connect the urban extension to Huntington.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes the LP fails to make the best use of land within the outer ring road at ST8. The alternative approach of, fixing the outer ring road as the GB boundary with fixed landscape corridors, would be consistent with national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes the alternative boundary would not detrimentally affect the understanding of the compact city within the original countryside context.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to criterion 2, there are opportunities through design of creating open corridors free from development to maintain any longer distant views. This has not been taken into consideration in the analysis.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to criterion 3, the creation of a landscape buffer either side of North lane, as well as alongside the outer ring road could mitigate this criterion and maintain an understanding of the relationship of the city to its hinterland. TP1 addendum does not provide a clear and justified reason for the detrimental impact that the release of land north of North Lane and west of ST8 will have on the GB purpose 4
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	with respect to criterion 4, there is no consideration for Monks Cross Link Road forming a logical and defensible boundary.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to criterion 5, the countryside feel of site ST8 will be maintained.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to local permanence, the assessment does not refer to considering alternative boundaries and refers to the proposed boundary using robust and permanent features. The outer ring road is a more appropriate long term boundary.
891	Redrow Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes site ST8 should be increased
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to sound with regards to the housing needs update as this fails to meet the full OAHN
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to the council's approach to identifying local housing need. The continued use of the 2018 projections despite the PPG requiring the continued use of the 2014 based household projections
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The standard methodology housing requirement stands at 1,013 dpa which is significantly higher than the G L Hearn HNA of 790 dpa which ignores the direction of travel.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The implications of fixing a housing requirement via the local plan that is lower than justified has significant implications for York and will lead to the worsening of an already severe affordability situation. Housing requirement likely to be increased in future reviews, therefore continuing to restrict the housing requirement will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Recommended that the housing requirement in Policy SS1 is increased to a minimum of 1013 in line with the standard method local housing need calculation
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Upon adoption, a review of the LP is immediately triggered to ensure the local plan is updated in line with the standard method and framework
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Recommend the undersupply of 512 is annualised over the first 5 years of the plan rather than over the plan period
891	Redrow Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers the housing requirement should be increased

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Whole Plan	-	Respondent does not consider the local plan to be sound, found it to not be positively prepared, effective, justified, and not consistent with national policy.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	York St John University Sport Park is 24ha site, on each side of Haxby Road, known as Mile Crux and Northfield. Site is major focus for development. Draft Policy ED5 support the expansion of University of using Northfield-including indoor facilities/outdoor facilities/floodlighting/car & cycle parking as appropriate. However the Plan proposes to include Northfield (and not Mile Crux) within the green belt, which conflicts policy ED5 and wider local plan strategy objectives to meet identified needs of the university, and contribute to making York a world class centre for education. It would constrain the Universities ability to expand its sporting provision through additional development (e.g. indoor facilities) supported by Policy ED5 but not accord with green belt policy, as this includes only provision for outdoor sport facilities in its exceptions to inappropriate development in the green belt.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	EX/CYC/59 Council states it has 'ongoing dialogue' with the university 'to understand their growth need up to and beyond the plan'. Respondent dispute any such dialogue has occurred. They also that there is clear recognition in the Council's evidence base of the need to support additional facilities at the Sport Park, and that these are to be provided at Northfield. This aim would clearly be frustrated by the proposed Green Belt boundaries at the site.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers the Council's approach to justifying the inner Green Belt boundaries, and assessing contribution that Northfield makes to Green Belt purposes, is fundamentally flawed. Contrary to the Council's assessment, Northfield site is not countryside. It is part of a busy sports campus which is used by students across a wide range of courses, by student sports clubs, and by the wider community. Respondents assessment shows that the land does not serve any of the three Green Belt purposes relevant to York, and there is no evidence to support the Council's case that it should be kept permanently open

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers that documents EX/CYC/46, EX/CYC/59, and EX/CYC/59d are not sound, as they do not meet the tests for soundness as required by para. 182 of the 2012 NPPF:- Test 1: Positively prepared. Proposed Green Belt boundaries, and inclusion of Northfield as Green Belt land, is inconsistent with the Local Plan strategy to meet objectively assessed development requirements by supporting the further expansion of the Sport Park at Northfield.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers that documents EX/CYC/46, EX/CYC/59, and EX/CYC/59d are not sound, as they do not meet the tests for soundness as required by para. 182 of the 2012 NPPF:- Test 2: Justified. Proposed inclusion of Northfield within the Green Belt is not justified when considered against the Council's own evidence. The land does not serve the three Green Belt purposes relevant to York, and there exist alternative options for robust boundaries that would provide a more enduring Green Belt.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers that documents EX/CYC/46, EX/CYC/59, and EX/CYC/59d are not sound, as they do not meet the tests for soundness as required by para. 182 of the 2012 NPPF: Test 3: Effective. Proposed Green Belt boundaries will serve to inhibit the deliverability of the Plan by impeding the intention to unlock the further potential of York St John University and frustrating the application of Policy ED5, which supports the expansion of the Sport Park at Northfield.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent considers that documents EX/CYC/46, EX/CYC/59, and EX/CYC/59d are not sound, as they do not meet the tests for soundness as required by para. 182 of the 2012 NPPF: Test 4: Consistent with national policy. Proposed Green Belt boundaries will not facilitate the delivery of sustainable development in accordance with the policies in the Framework. The requirements para. 85 of the 2012 NPPF have not been correctly interpreted, and the Council has: not ensured consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and included land which it is unnecessary to keep permanently open; and failed to ensure that the Green Belt boundary will not need to be altered at the end of the development plan period.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent refers to Section 5, boundaries 1&2. Northfield located on the western side of Haxby road, to the north of the Nestle works complex. Site form part of wider York St John University Sport Park. Detailed green belt boundaries proposed by Council include Northfield site within Green Belt. Respondents consider this designation to be in conflict with the councils local plan objective of contributing to making York a world class centre for education, and more specifically conflicts with draft local plan Policy ED5 which supports the use of Northfield for further expansion of the University Sport Park.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent refers to Section 5, boundaries 1&2. Inclusion of Northfield within Green belt constrains the University's ability to expand its sporting facilities and doesn't properly consider the need to meet this growth, as recognised in policy ED5 and in the Council's Green Belt evidence. It is considered that the Council's approach in applying its own methodology to defining the Green Belt boundaries in relation to the Northfield site is also flawed.
901	York St John University	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent refers to Section 5, boundaries 1&2. York St. John University Sports park located at Haxby Road, approx. 1.5km north of York city centre, the land is a total of 24ha consisting of 2 sites Mile Crux and Northfields. Mile Crux the subject of major development and now accommodates 3 full size, floodlit artificial pitches; 3 floodlit outdoor tennis courts; a Hub Building with changing and teaching facilities; an indoor Sports Hall; an indoor tennis centre; an all-weather sprint track; a retained area of grass pitches; and a surfaced car/coach park. Northfield currently comprises two areas of grass pitches, which have been subject to drainage and levelling works to provide high quality playing fields comprising 2 football/rugby pitches, 3 football pitches, and up to 3 junior pitches. At present, Northfield does not accommodate any built facilities and the pitches have no floodlighting.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Proposals Map (North) for emerging Plan allocates entirety of the University Sport Park (i.e. both Northfield and Mille Crux) as areas of 'Existing University Campuses' and as 'Existing Open space'. Northfield, and not the Mille Crux site, has an additional designation as being within Green Belt land. Planning policy relating to the further expansion of York St John University is addressed by Policy ED5 of the Publication Draft Local Plan. Respondent believes these two allocations to conflict.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	EX/CYC/59- (Respondent refers to Section 5, boundaries 1&2) Green Belt boundaries around York are being defined (or established) for the first time. Not being altered. In defining/establishing boundaries the Council must meet the identified requirement for sustainable development, i.e. it must allocate land to meet identified needs for housing, employment, education, leisure and other needs. Section 4 of the Topic Paper Addendum summarises the Local Plan strategy for meeting identified requirements for sustainable development, and how the strategy to meet these requirements has been formulated. In relation to 'Education Needs', Para. 4.46 states that the Local Plan has a role to help meet the vision to making York a world class centre for education:- 'by providing sufficient land to for educational facilities to reflect the aspiration and needs of local communities'. Para. 4.51 states that the Council's work on the Local Plan to understand the expansion opportunities of higher and further education establishments:- 'has focused on discussions around recent trends in student numbers and the associated business expansion plans of these organisations as well as an understanding of the type of land uses required and their suitability to fit with the Green Belt'. In relation to York St John University and its Sport Park, Para. 4.51 states:- 'the need for additional land for sports uses to support the universities (sic) development of a centre for sporting excellence at Northfield, Haxby Road will be met within the main urban area'. Addendum thus explicitly recognises a requirement for land to be allocated to meet an identified need for the expansion of the University's Sport Park facilities at Northfield. At the same time, however, it contains the assumption that Northfield will be considered in the Local Plan as part of the urban area. This assumption has not been carried through to the proposed Green Belt boundaries, nor is it reflected in the Key Diagram for the Local Plan (EX/CYC/46), which identifies the Mille Crux site as being within York's main urban area but not Northfield.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Section 7 of Addendum seeks to explain how the Council has taken account of requirements of para. 84 of the (2012) NPPF which states that: '-when drawing up Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development'. At para. 7.5, the Addendum states Council has sought to ensure that a wide range of sites have been identified and assessed for their potential uses through the Site Selection process, and that it took a proactive approach to identifying potential sites for all types of development. The Respondent (University) endorses the fact that this process has resulted in the allocation in the draft Plan of the Sport Park site as 'Existing University Campuses', and the inclusion of Policy ED5 supporting the further expansion of the Park.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent refers to Section 5, boundaries 1&2. The Council's approach to defining Green Belt boundaries has clearly not properly recognised the constraints which the Green Belt places on the University's ability to expand the Northfield site in accordance with Policy ED5.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 10.28, Addendum states that 'there has been ongoing dialogue between the Council and York St John University through iterative consultation on the Local Plan to understand their growth needs up to and beyond the plan period [CD013A]..'. The CD013A document is the Council's Consultation Statement of May 2018, which states only that 'general support was received' from the University regarding Policy ED4 of the Plan which relates to its Lord Mayor's Walk Campus. Importantly, Addendum omits any reference to the subsequent representations made on University's behalf in July 2019 (outlined in the September 2019 Consultation Statement Addendum, EX/CYC/22). These representations set out the University's objections to proposed Green Belt designation for Northfield (Section 5 Boundary 1&2), and its concern over the conflict between the draft Plan's support for the expansion of the Sport Park at Northfield and its, and sought site be removed from Green Belt.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	In referencing 'ongoing dialogue' Para 10.28 in Addendum Council asserts has taken place with the University, the Addendum at Paragraph 10.29 again emphasises its support for expansion of the Sport Park but repeats the assumption that this will be met on land outside the Green Belt: 'Whilst there is a recognition of the need...for additional sports facilities, this has been met on identified sites within the urban area and is supported by policy ED5..' In context of above, respondents consider that proposed inclusion of the Northfield site within the Green Belt is not consistent with the Local Plan strategy and inhibits the explicitly stated intention to meet the University's future development needs at the Sport Park. In addition, respondents believe there remains fundamental issues with the way the Green Belt methodology has been applied in the assessment of local detailed boundaries as set out in Annexes 2, 3 and 4 of the Addendum. Respondents consider that the Council has taken an overly constrictive approach in its evaluation to the boundary sections. This seems intent more on serving a pre-established conclusion that boundaries must be drawn tightly around existing development limits, rather than providing a critical analysis of whether it is necessary to keep the land permanently open.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield site falls within Section 5 of the proposed Inner Boundaries detailed in TPI Annex 3, with the relevant boundaries numbered 1&2. The Green Belt boundary proposed for this area is drawn tightly around the northern edge of the Nestle works site and before turning to the north along the eastern edge of Haxby Road. The Council's detailed assessment for the Inner Boundaries 30-31 states that it is necessary to keep the Northfield site permanently open in relation to each of the three purposes identified as relevant to the York Green Belt. Respondent goes into further detail regarding Green belt purposes and the Northfield site.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield Site, Section 5, Boundary 1&2 . Regarding Purpose 4 - To preserve the setting and special character of historic towns// Two pitches at Northfield are each enclosed by mature tree belts and hedgerows along full extent of the northern, southern, and western boundaries. Boundaries along eastern boundary with Haxby Road feature low level hedgerow planting and recent tree planting (respondent includes Aerial View and Photographs). Contrary to the Council's assessment in Annex 3, two areas of Northfield do not comprise 'open rural land'. Nor do they form part of, or physically connect with more open land including Bootham Stray, which lies to the west of the site and extends to the outer ring road between Clifton Moor and Earswick. The enclosed site therefore does not contribute to views of the Minster or the wider setting of the compact setting of the City which are available from distance through the open wedge of the Stray. Given the above, respondents consider that the site does not contribute to the setting or understanding of the historic city, and there is no clear or compelling justification why it is necessary to keep this land permanently open to serve this Green Belt purpose. If Northfield were to be developed to include additional sporting facilities, as clearly supported by the Local Plan strategy, it is held that this would not have an adverse impact on the city's special historic character.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield Site, Section 5, Boundary 1&2. Regarding Purpose 1- To check the unrestricted sprawl of large built-up areas// Development to support use of the York St John Sport Park on a site proposed for allocation as existing University campus cannot be considered as threatening urban sprawl. The Sport Park is a defined site with a specific use, within which Northfield is intended accommodate further expansion of facilities. The Council assessment fails to take account of this context, and further fails to offer any clear evidence to support its conclusions that Northfield must be kept open to prevent unrestricted sprawl. The Annex refers to the land being connected to the urban area, and lack of built structures, but neither of these factors would demonstrate why it is necessary for the land to be included in the Green Belt. The main justification that land does serve Purpose 1 is provided in the statement that land adjacent to Boundaries 1&2, "is unconstrained by built development or strong boundaries on more than one

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				side, and therefore not contained or enclosed in a way that would prevent sprawl'. However, the Northfield site comprises two areas which are both well contained by existing mature boundary planting. If this land were not to be included in Green Belt, these existing physical features would still provide robust and enduring boundaries that would be readily recognisable and equally serve to check unrestricted sprawl.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield Site, Section 5, Boundary 1&2. Regarding Purpose 3 - To assist in safeguarding the countryside from encroachment// Basic premise of Council's Purpose 3 assessment is the land outside of Boundaries 1 & 2 predominantly functions as part of the countryside and contributes to the character of the countryside through openness and views. These factors would not necessarily mean such must be kept permanently open. However, the Council's assertion that Northfield is part of the countryside is strongly challenged. The Northfield site is active part of York St John University Sport Park with its grass pitches widely-used by students and the local community. The site is allocated in the draft Local Plan as an existing University Campus and is intended to accommodate further expansion of the Sport Park in the future. This may include changing and supporting facilities, indoor sport facilities, all-weather pitches, and lighting. Further development at Northfield site could not therefore be considered as encroachment into the countryside, and it is not necessary for the site to be kept open to serve Purpose 3. The strong landscape boundaries around the Northfield site would offer more meaningful, permanent and enduring Green Belt boundaries that would ensure the Council could deliver its strategy to support expansion of the Spot Park facilities and fulfil its requirement to meet the identified development needs of the University.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Para. 85 of NPPF states that, when defining Green Belt boundaries, local planning authorities should ensure consistency with Local Plan strategy for meeting identified requirements for sustainable development. The Publication Draft Local Plan emphasises that further education sector is of key importance to the economy, and states that the Plan will help unlock the further potential of York St John University through development and redevelopment at their current sites (para. 2.4). It acknowledges that the University excels in sport activity and recognises the major investment made in buildings and facilities to create a centre for sporting excellence at the Sport Park (para. 1.61). The Plan and its evidence base clearly recognise that there is identified requirement for further development at the Sport Park. The need for additional facilities is explicitly stated in the TP1 Addendum (paras 4.51 & 10.29) and is preserved in draft Plan through allocation of the Sport Park as an 'Existing University Campus' and by inclusion of

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				Policy ED5 ('York St John Further Expansion') which supports meeting these development needs at Northfield. The above represents positive support for the University's aspirations to further improve its facilities and enhance its reputation for sport, as expressed in the explanatory text for Policy ED5: 'The allocation of the site reflects York St. John University's ambitions and supports its major investment in the Sports Park. It will assist in further extension of its strategy for sport that supports the teaching of a range of sports degrees but also for the general fitness and enjoyment of students and community teams who use the site'. However, the requirement to provide sufficient land for York's educational establishments has not been taken into account in the Council's proposed Green Belt boundaries. This has led to the situation where on one hand the Local Plan evidence supports the allocation of the Northfield site as part of the York urban area, and on another states that the site should be included in the Green Belt and is not suitable for development.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent maintain that the proposed inclusion of the Northfield site (Section 5, Boundary 1&2) within the Green Belt is not compatible with Policy ED5 and would be contrary to the clear and stated Local Plan strategy to support the development needs of the University
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield site, Section 5, Boundary 1&2. Explanatory text for Policy ED5 states that providing they comply with relevant policies in the rest of the plan, appropriate uses of the Northfield site may include: //outdoor sports facilities, together with associated car and cycle parking and floodlighting;// appropriate indoor sports facilities; and// other outdoor recreational activity.// Inclusion of Northfield site within the Green Belt would therefore mean that all future development would necessarily also be assessed against the requirements of Local Plan Policy GB1. This would make the provision of 'appropriate indoor facilities' - as nominally supported by draft Policy ED5 - much more difficult, given that such proposals would not be included in the exceptions to inappropriate development in Green Belt under draft Policy GB1, which covers only the provision of 'appropriate facilities for outdoor sport and outdoor recreation'. This is particularly important given the acknowledged under-provision of indoor sporting facilities in the City, and the opportunity that Northfield presents to assist in meeting this demand within an existing centre for sport at a sustainable location within comfortable walking and cycling distance of the city centre.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield site, Section 5, Boundary 1&2. Provision of floodlighting, all-weather pitches, and parking facilities at Northfield, as also supported by Policy ED5, would all also become unduly problematic, given that these are usually considered urbanising features and not appropriate in Green Belt
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield site, Section 5, Boundary 1&2. Green Belt restrictions would have an unnecessarily restrictive and detrimental effect on the long term growth prospects of the University and its ability to improve facilities at its Sport Park in the future. It would make the planning process for bringing forward proposals for sporting facilities much more onerous, presenting greater risk to the University and having a detrimental impact on its ability to obtain funding.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	In the context of Northfield site, Section 5, Boundary 1&2- Respondent assert that this amounts to a fundamental failure to meet the requirements of NPPF Para. 185 which requires that when defining Green Belt boundaries, the Council should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield site, Section 5, Boundary 1&2. Respondent assert that Council's detailed assessment of the Green Belt boundaries in relation to the Northfield site, are also fundamentally flawed. Contrary to the Council's assessment, the site is not open countryside, is not unenclosed land and does not form part of, or physically connect with areas of open land including Bootham Stray. The site also does not contribute to views of the Minster or the wider historic setting or character of the City. The land at Northfield does not fulfil any of the three Green Belt purposes relevant to York. As such, it is clearly unnecessary to keep the land permanently open, and it should be excluded from the Green Belt in accordance with NPPF Paragraph 85.
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield site, Section 5, Boundary 1&2. Respondents view that the Council's approach to defining the Green Belt is flawed, and that the inclusion of Northfields within the Green Belt conflicts with the Local Plan strategy to support the identified development needs of York St John University. In this context, respondent consider that documents EX/CYC/46, EX/CYC/59, and EX/CYC/59d are not sound, as they do not meet the tests for soundness as required by para. 182 of the 2012 NPPF.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
901	York St John University	Section 03 Spatial Strategy	Policies Map (Green Belt)	Northfield site, Section 5, Boundary 1&2. Respondent consider that the Green Belt boundaries at Northfields should be reconsidered, with a view to omitting the site from the Green Belt to ensure consistency with Local Plan objectives to support the use and development of the Sports Park.
920	Private Individual	Whole Plan	-	Document is sound as has taken so long to produce.
921	Private Individual	Whole Plan	-	Respondent support the Local Plan as sound as it is prepared in correct manner to achieve sustainable development. in agreement with national policy. It gives full consideration of sustained development of land for housing with consultation of bodies such as the Environment Agency
922	Private Individual	Whole Plan	-	Document is sound as the document has been positively prepared involving exhaustive consultation with the Local community and it is consistent with National policy
922	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Supports the proposed Green Belt boundaries in the parish of Rufforth with Knapton as these are consistent with those shown in the Neighbourhood Plan. The proposed boundaries therefore have the full support of local residents as required under the Localism Act 2011.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
922	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Supports Green Belt boundary - This paper explains in detail the reasoning behind the boundary definitions
923	York Consortium of Drainage Boards	Whole Plan	-	Para. 1, Section 4.2: "Greenfield sites are to limit the discharge rate to the pre developed run off rate. The pre development run off rate should be calculated using either IOH 124 or FEH methods (depending on catchment size)." The Board would however usually request that only the rate of 1.4 litres per second per hectare is used for greenfield sites and we do not usually allow the IOH 124 or FEH methods.
924	Private Individual	Whole Plan	-	Respondent considers the document to be sound, with the City Council having provided evidence to support the key principles.
924	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent supports the plan period up to 2032/2033.
924	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent supports the ability for the new GB to remain in place until 2038.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
924	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent supports the proposals to define the GB and the areas defined by it.
924	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is sensible to have a policy that makes best use of previously developed land for future developments.
924	Private Individual	Section 09 Green Infrastructure	GI2A Strensall Common SAC	Respondent supports the proposals to remove large development in Strensall as it is too close to the Strensall Common Environment.
925	Private Individual	Whole Plan	-	Believes document is sound
925	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Strongly supports changes to GB in vicinity of Strensall Barracks (PM101) - as will help to protect Strensall Common and SAC from overuse and degradation.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
925	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	supports the whole proposed Green Belt boundary around Strensall. Boundary should remain as submitted but with modifications as proposed around the barracks (PM101)
925	Private Individual	Section 09 Green Infrastructure	GI2A Strensall Common SAC	Supports PM 70 as it is important that the impacts future developments (including medium scale and infill developments), may have on Strensall Common, are considered.
926	Private Individual	Whole Plan	-	Greater clarity. Information is not easily interpreted into a clear strategy. This makes it difficult for a lot of lay people to understand and therefore their ability to make comments.
926	Private Individual	Whole Plan	-	Not a change to the document but rather the process of engagement and consultation. Respondent believes the document should be circulated via local council communications.
926	Private Individual	Whole Plan	-	Respondent considers the document to be sound in their statement but proposes a few issues in their rationale. Whilst the majority of the document has been created with the key tests considered: positively prepared, justified and effective, respondent does not believe many of the proposals are consistent with national policy. With reference to the Green belt, the respondent remarks that the Green belt land should only be considered for building if there is an absence of more suitable land.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
926	Private Individual	Whole Plan	-	Respondent does not consider the document to be legally compliant. Reasoning for this surround the issue of lack of serious engagement with the public, with the respondent highlighting the fact that the document had not been circulated for public comments of impacted residents and was only made aware by a neighbouring resident informing people affected by the boundary lines. Respondent believes the proposals have not been actively communicated.
927	Rufforth with Knapton Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Supports the proposed Green Belt boundaries in the parish of Rufforth with Knapton as these are consistent with those shown in the Neighbourhood Plan. The proposed boundaries therefore have the full support of local residents as required under the Localism Act 2011. A balance of meeting local housing needs and preserving rural character of the parish is reached.
927	Rufforth with Knapton Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Supports the proposed Green Belt boundaries in the parish of Rufforth with Knapton as these are consistent with those shown in the Neighbourhood Plan. The proposed boundaries therefore have the full support of local residents as required under the Localism Act 2011. A balance of meeting local housing needs and preserving rural character of the parish is reached.
927	Rufforth with Knapton Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Document prepared in great detail and approach to Green Belt is logical and in compliance with National Policy
927	Rufforth with Knapton Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Gives weight to Green Belt importance in protecting historic setting of the City of York and protecting rural character of surrounding villages. At the same time local housing need are met and proposal fully takes this into account.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
927	Rufforth with Knapton Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Housing needs assessment exhaustively prepared in professional manner.
927	Rufforth with Knapton Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Several iterations of work all broadly gave the same conclusion to the number of required dwellings in Planning period, this should give great confidence in the work. Considered that needs will be fully met despite the protestation of developers.
927	Rufforth with Knapton Parish Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Plan should be commended for providing balance between meeting housing needs and protecting the essential Green Belt around York and has the support of residents of the Parish.
928	S Walton	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York ⁹	Policies PM13 and PM14, concerning removal of QEB site from allocation of 500 houses unsound. Don't consider all positive mitigation factors considered, such as the availability of many dog walking parks in the last 12 months in the area as alternative spaces for dog walkers, including Haxby, Flaxton, Strensall, and others. Enough consideration not given to restricting access to the common at certain times to limit any impact or stop walkers on the common walking their dogs.
928	S Walton	Section 05 Housing	Site Allocation ST35	Add back QEB site as allocated for housing.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
929	Poppleton Neighbourhood Plan Group	Section 03 Spatial Strategy	Policies Map (Green Belt)	Does not consider document to be legally compliant. Movement of the open space of the 2005 plan to development potential in the new plan is contrary to the approved Neighbourhood Plan.
929	Poppleton Neighbourhood Plan Group	Whole Plan	-	No consultation with any members of the neighbourhood committee or the parish councils of the two villages about the removal of the agreed village settlement line.
929	Poppleton Neighbourhood Plan Group	Section 03 Spatial Strategy	Policies Map (Green Belt)	Does not consider the document to be sound due to the contradicting nature of boundary 2 and the already approved neighbourhood plan. The Local Plan removes the open space designation at Blairgowrie House, contrary to the approved Neighbourhood Plan.
929	Poppleton Neighbourhood Plan Group	Section 03 Spatial Strategy	Policies Map (Green Belt)	Policies in the neighbourhood Plan for Upper and Nether Poppleton (specifically PNP 6D) and statements made by the inspectorate must be fully acknowledged in the boundary 5 on the Local Plan.
930	Private Individual	Whole Plan	-	Respondent considers the document to have shown good judgement and be fit for purpose

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
930	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	p245/268 Green Belt Boundary - Agrees that the Green Belt Boundary should follow the boundary as depicted on p245 and 268 as it determines a clear and defensible final boundary. Agrees with the need to define the recognisable and permanent boundary including to the rear of existing developments. Agrees that the land should not be built on, to prevent sprawl as this will protect Strensall as a conservation village and the historic landscape.
930	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	p258 Boundary 4 - Does not agree with the alternative boundary to boundary 4 as this would result in sprawl, harm to wildlife and protected species, would not protect the form and character of the conservation village or its historic landscape
930	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	p260 Boundary 4 – Agrees with the permanence of proposed boundary
930	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Document is not justified regarding the alternative boundary for boundary 3 on p258 – the decision would have an adverse effect on the permanence of the York Green belt land resulting in sprawl, harm to wildlife and protected species and would not protect the form and character of the conservation village or its historic landscape
931	Linda Donnelly	Section 03 Spatial Strategy	Policies Map (Green Belt)	Support keeping Boundary 7 Section 8, mast field, area South of Millennium Bridge in the permanent Green Belt. Believes keeping this area in the green belt to be sound justified and in keeping with the NPPF, in that these areas perform an important role in defining the edge of York and its historic setting at the natural edge of built development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
931	Linda Donnelly	Section 03 Spatial Strategy	Policies Map (Green Belt)	Support keeping Boundary 9 Section 8 allotments, walled garden, area South of Millennium Bridge in the permanent Green Belt. Believes keeping this area in the green belt to be sound justified and in keeping with the NPPF, in that these areas perform an important role in defining the edge of York and its historic setting at the natural edge of built development.
932	Vistry Homes	Whole Plan	-	Respondent considers the document to be sound.
932	Vistry Homes	Section 05 Housing	Site Allocation ST9	Land ST9 'the Site' the representations previously submitted by DPP in support of the draft allocation of the strategic housing site known as ST9 confirmed that the Site is available and suitable for housing development, and that residential development is achievable.
932	Vistry Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent assessed the Site (ST9) against the revised methodology: Urban Sprawl: Council content Site will not result in urban sprawl, Site adjacent to the village Haxby, which is not a large urban area. The Site is well contained by development, trees and hedgerows and there are limited views into the Site. Site comprised of a number of long linear fields divided by hedgerows, trees and drainage ditches. Does not have a sense of openness although it is open. The boundaries of Site established and clear and provide logical edge to Haxby. The development of the Site would therefore be restricted and would not result in sprawl. Encroachment: Site is in countryside, however the character of the Site is not one of open fields with extensive views across it to the City of York and nor is there public access across it. Annex 4 of the TP1 Addendum notes that there are existing pockets of ribbon development located on Moor Lane, which the Site encompasses. Serves to reduce the extent by which the Site is extending into the countryside. Compactness: Proposed allocation adjoins the settlement of Haxby on its northern side and as such the development of the Site will not undermine the perception of the compact form of the City of York. Haxby is relatively large settlement and the

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				<p>development of ST9 a logical extension of this sustainable settlement which will reinforce perception of the compactness of Haxby. Given the location of the Site, the development of this land will not lead to Haxby coalescing with any settlement, not least the City of York. The development of the Site will not affect the relation between the City of York and the surrounding ring of villages, and will not affect the strays, Ings and green wedges or the open approaches to the city. Landmark Monuments: Haxby Conservation Area is situated at centre of the village, a considerable distance from the Site itself, and is separated from the Site by relatively modern suburban housing. There are no other heritage assets in the vicinity of the Site. The City of York is situated to the south of the village and is not visible from within the Site. When traveling around the ring road the Site is not visible. Further, we would not describe Haxby Road as an open approach into the City as it travels through Haxby itself. When approaching the City of York, via Haxby Road, the Site is seen against backdrop of Haxby which does not compromise the setting of York. Landscape Setting: Given the location of the Site to the north of Haxby the land does not aid the understanding of the historical relationship of York to its rural hinterland. Travelling around York it retains the perception of a City within a rural setting. The Site does not lie within any of the strays, Ings, river corridors or green wedges which we agree are important to the special character of the City of York. The Council concluded that the Site does not serve any important purposes for the inclusion of land within the Green Belt when assessed against these criteria in the revised TP1 Addendum 2021. More specifically, the Council confirmed that the Site lies outside the extent of land specifically identified by the evidence base as being important for maintaining the historic character and setting of York. Equally, they confirm that Site does not fall within an area which needs to remain open to aid the perception of the compactness of the City of York or its rural setting.</p>
932	Vistry Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	<p>The Developer continues to support the conclusions reached by the Council and supports the allocation of the Site (ST9) in the emerging Local Plan and the conclusions reached in the TP1 Addendum 2021 and the associated evidence base regarding ST9.</p>

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
932	Vistry Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	The Developer supports the settlement limits and Green Belt boundary as proposed within the emerging Local Plan. The northern most boundary is a clear and logical edge to the settlement. From Moor Lane, the boundary runs northward, with the adopted highway providing a clear physical edge. The boundary moves eastwards towards Usher Lane, encompassing the Site. The northern boundary of the Site follows established field boundaries, comprised of trees, hedgerow and drainage ditches. The east side the boundary follows Usher Lane. The boundary is sufficiently permanent and is clearly distinguishable. Provides a recognisable and logical edge to the settlement, and ensures that the settlement, and open countryside to the north remain distinct and separate. The Developer is of the view that the use of such a strong and clear boundary will ensure the Council are able to prevent unrestricted sprawl and encroachment into the countryside. The Developer supports the Green Belt boundary in this location.
932	Vistry Homes	Section 05 Housing	Site Allocation ST9	The Developer continues to Support as a draft allocation. The Developer remains committed to the development of the Site (ST9), which remains available, suitable and deliverable. The Developer also supports the estimated development capacity of the Site and confirms that this can be delivered in the plan period.
932	Vistry Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Having considered the updated and additional information relating to determine; whether land needs to be kept permanently open and included in the Green Belt, and the delineation of appropriate Green Belt boundaries, it is clear that the Site (ST9) remains suitable as a housing allocation, that the Site does not need to be kept permanently open and that the Green Belt boundaries are appropriate. The Developer supports the assessment of the Site and the conclusion reached regarding it. In this respect, the Developer is of the view that the Local Plan has been positively prepared, and that the allocation of Site ST9 is deliverable, justified and consistent with NPPF.
932	Vistry Homes	Section 05 Housing	Site Allocation ST9	In relation to the land ST9 'the Site' the representations previously submitted by DPP in support of the draft allocation of the strategic housing site known as ST9 confirmed that the Site is available and suitable for housing development, and that residential development is achievable.

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932	Vistry Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Developer supports the draft allocation of the Site (ST9) within the emerging Local Plan. The Developer believes Site does not materially fulfil any of the purposes of the Green Belt around York, when reassessed using also wishes to reiterate that the allocation of the Site in the emerging Local Plan is crucial in ensuring the Council are able to meet the housing requirement cited in the emerging Local Plan, taking into account the GL Hearn Housing Needs Update September 2020, and the SHLAA Update (April 2021).
932	Vistry Homes	Section 05 Housing	Site Allocation ST9	ST9 was assessed as part of site selection methodology and was deemed suitable and appropriate for development and did not need to be kept permanently open. The Site was subsequently included as a housing allocation in the Local Plan Preferred Options Draft (2013), Publication Draft Local Plan (2014), Local Plan Preferred Sites Consultation (2016) and the Local Plan Publication Draft (2018). The suitability and appropriateness of the Site for housing development has therefore never been in question.
932	Vistry Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Revised methodology aligns more closely with the purposes of including land within the Green Belt, although we still have some concerns. It is clear that the Site does not materially contribute to any of the purposes of including land within the Green Belt, as set out in the TP1 Addendum 2021. Therefore, the allocation of ST9 remains appropriate, as acknowledged by the Council.
932	Vistry Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent assessed the Site (ST9) against the revised methodology: Urban Sprawl: Council content Site will not result in urban sprawl, Site adjacent to the village Haxby, which is not a large urban area. The Site is well contained by development, trees and hedgerows and there are limited views into the Site. Site comprised of a number of long linear fields divided by hedgerows, trees and drainage ditches. Does not have a sense of openness although it is open. The boundaries of Site established and clear and provide logical edge to Haxby. The development of the Site would therefore be restricted and would not result in sprawl. Encroachment: Site is in countryside, however the character of the Site is not one of open fields with extensive views across it to the City of York and nor is there public access across it. Annex 4 of the TP1 Addendum notes that there are existing pockets of ribbon development located on Moor Lane, which the Site encompasses. Serves to reduce the extent by which the Site is extending into the countryside. Compactness: Proposed allocation adjoins the settlement of Haxby on its northern side and as such the development of the Site will not undermine the perception of the compact form of the City of York. Haxby is relatively large settlement and the

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				<p>development of ST9 a logical extension of this sustainable settlement which will reinforce perception of the compactness of Haxby. Given the location of the Site, the development of this land will not lead to Haxby coalescing with any settlement, not least the City of York. The development of the Site will not affect the relation between the City of York and the surrounding ring of villages, and will not affect the strays, Ings and green wedges or the open approaches to the city. Landmark Monuments: Haxby Conservation Area is situated at centre of the village, a considerable distance from the Site itself, and is separated from the Site by relatively modern suburban housing. There are no other heritage assets in the vicinity of the Site. The City of York is situated to the south of the village and is not visible from within the Site. When traveling around the ring road the Site is not visible. Further, we would not describe Haxby Road as an open approach into the City as it travels through Haxby itself. When approaching the City of York, via Haxby Road, the Site is seen against backdrop of Haxby which does not compromise the setting of York. Landscape Setting: Given the location of the Site to the north of Haxby the land does not aid the understanding of the historical relationship of York to its rural hinterland. Travelling around York it retains the perception of a City within a rural setting. The Site does not lie within any of the strays, Ings, river corridors or green wedges which we agree are important to the special character of the City of York. The Council concluded that the Site does not serve any important purposes for the inclusion of land within the Green Belt when assessed against these criteria in the revised TP1 Addendum 2021. More specifically, the Council confirmed that the Site lies outside the extent of land specifically identified by the evidence base as being important for maintaining the historic character and setting of York. Equally, they confirm that Site does not fall within an area which needs to remain open to aid the perception of the compactness of the City of York or its rural setting.</p>
932	Vistry Homes	Section 05 Housing	Site Allocation ST9	<p>The Developer continues to support the conclusions reached by the Council and supports the allocation of the Site (ST9) in the emerging Local Plan and the conclusions reached in the TP1 Addendum 2021 and the associated evidence base regarding ST9.</p>

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
932	Vistry Homes	Section 05 Housing	Site Allocation ST9	The Developer continues to Support as a draft allocation. The Developer remains committed to the development of the Site (ST9), which remains available, suitable and deliverable. The Developer also supports the estimated development capacity of the Site and confirms that this can be delivered in the plan period.
932	Vistry Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent wishes to reiterate the importance of the Site's (ST9) allocation in ensuring that the Council are able to achieve the delivery trajectory outlined within the SHLAA update and in meeting the housing requirement identified in the GL Hearn report.
932	Vistry Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent content development of Site (ST9) will deliver in excess of the requisite volume of units cited in the SHLAA and confident that the vast majority of dwellings can be delivered within the Plan Period. Developer content that development of the Site will deliver the much-needed new dwellings envisaged and confident that completion of the Site can be achieved within the short term. The Developer is a top 5 housebuilder (rather than simply a land promotor) with a strong track record of delivering both market and affordable homes.
932	Vistry Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The GL Hearn Housing Needs Update 2020, and the SHLAA Update 2021 serve to underline the importance of the Site (ST9) enabling the Council to deliver housing within the plan period. The Council have accepted ST9 is available and Site is suitable for residential development, and it can be delivered. The Developer therefore wholly supports the allocation known as ST9. The Developer also supports the estimated development capacity of the Site and confirm it can be delivered within the plan period.
932	Vistry Homes	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to ST9, the respondent wishes to support the draft allocation of the site within the emerging local plan. Respondent wishes to reiterate that the allocation of the site in the emerging local plan is crucial in ensuring the council are able to meet the housing requirement cited in the emerging local plan, considering documents CYC_43a and CYC_56

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
932	Vistry Homes	Section 03 Spatial Strategy	Policies Map (Green Belt)	The respondent supports the settlement limits and Green belt boundary as proposed within the emerging local plan. In particular the northern most boundary is a clear and logical edge to the settlement.
932	Vistry Homes	Whole Plan	-	The respondent is of the view that the local plan has been positively prepared, and that the allocation of site ST9 is deliverable, justified and consistent with NPPF.
932	Vistry Homes	Section 05 Housing	Site Allocation ST9	The respondent continues to support the allocation of site ST9. The respondent remains committed to the development of the site, which remains available, suitable and deliverable as well as the estimated development capacity of the site and confirms that this can be delivered in the plan period.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. Objects the continued omission of site ST13 and has the view that the revised methodology to determine GB boundaries is not sound in respect of the site.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is unconvinced that the work undertaken by the council in respect to the methodology gives rise to GB boundaries which are justified, reasonable and ultimately sound.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does agree with the approach that because there are no towns within the York authority area, the need to assess whether land should be kept permanently open to prevent neighbouring towns from merging does not arise.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned by the use of the additional criteria to assess land against the first, third and fourth purposes of including land within the GB.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to compactness, the respondent is concerned by the need to retain the dense compact city or village form in an open or rural landscape. Just because land has not been built on does not make it important to the understanding of the special character of an area which is what the criterion suggests.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landmark monuments, the respondent finds it difficult to understand how an assessment of every heritage asset, as required under this criterion, will ensure the fourth purpose has been duly considered.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landscape and setting, the respondent finds it difficult to discern why the significance of historic gardens is considered, exemplifying a general confusion and conflation as to what is and what is not historic, and how such contributes to the setting and special character of historic towns.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is unclear as to how all three of these criteria have the potential to render the whole of the York authority area. Not all land around a settlement will be important to this purpose of including land with the GB.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to purpose 1, finds this criteria as illogical as it would mean any existing building/farmstead would need including within the GB to reduce the chance of sprawl.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With reference to purpose 3, respondent believes it is unclear how this assessment would aid one's understanding of whether or not land needs safeguarding from encroachment or what is truly countryside as opposed to land that has been influenced by urban development.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent views the emerging local plan as not being positively prepared, the land included within the GB is not justified, it will not be effective and it is not consistent with national policy.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound and objects to the housing requirement as it fails to meet the needs of the city.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has concerns over the method used to calculate housing need. OAN is an old approach as the standard method is the one that is prevailing.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's decision to continue to use the OAN process will almost certainly result in a significant change to their local housing need figure once the standard method is used as part of a local plan review.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inevitable transition from the OAN process to the standard method will result in an increase in the housing requirement will result in further alterations to the GB.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are a number of deficiencies in the housing needs update. The housing requirement and evidence base are not justified, and the local plan will not be effective in meeting the city's needs. It has not been positively prepared and the approach adopted does not reflect national policy.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement should be recalculated and reflect a figure similar to that produced by using the standard method.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
933	Crossways Commercial Estates Ltd	Section 05 Housing	Site Allocation ST13	Respondent does not consider the document to be sound with respect to the omission of site ST13.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes the site remains a logical and natural addition to the village. The immediacy of the existing suburban development diminishes any sense that the site is open countryside or fulfils a specific GB purpose by being permanently open. The site has previously been deemed as suitable as a housing allocation within the emerging local plan.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent reinstates that the council have never asserted the site performs a GB purpose or that the GB boundaries were inappropriate and irrespective of the technical issue it is plain that ST13 does not need to be kept permanently open.
933	Crossways Commercial Estates Ltd	Section 05 Housing	Site Allocation ST13	The site ST13 should not be included in the emerging local plan within the GB.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST13. With respect to the compactness, Copmanthorpe is located beyond the outer ring road, a considerable distance from York, and is clearly not viewed in the same context. Allocation of site would not affect the compact form of York as a result. The site is not located in one of the strays, lngs or green wedges and is not on the main approach to the city.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST13. With respect to landmark monuments, there are no landmark monuments within the vicinity of the site. Respondent agrees that the assertion that much of the historic core of the village is now subsumed by suburban development. Allocation of the site however, would not significantly increase the overall scale of Copmanthorpe to an extent which would take it out of proportion with the scale of York's outlying settlements
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST13. With respect to landscape and setting, the site lies a considerable distance from York to the south of the A64 and to the west of Copmanthorpe. the site remains discrete and separate from the wider landscape that surrounds the city
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST13. With respect to urban sprawl, the site forms part of Copmanthorpe, a sustainable but modest village. It is not a large built-up area and so the development of the site will not give rise to the sprawl.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST13. With respect to encroachment, whilst the site is open and undeveloped, it is bound on two sides by suburban development which extends along the field boundary and is a notable and urbanising feature.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST13 remains available, and capable of accommodating housing growth. site contributes very little to the purposes of the GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
933	Crossways Commercial Estates Ltd	Section 05 Housing	Site Allocation ST13	ST13 should be reinstated as an allocation within the emerging local plan to cater for the increase in housing requirement that is required in order to render the local plan sound.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound and object to the GB boundaries proposed around Wheldrake, as defined in Annex 4 of the TPI Addendum 2021
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Flawed methodology has resulted in a GB boundary which is unjustified and ultimately unsound. Boundary is unsound with respect to site ST13, as the site is bound on two sides by existing built development and is perceptibly different in character from land to the west, which is vast and open and provides extensive views.
933	Crossways Commercial Estates Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent suggests GB boundary is modified to encompass the site ST13. Boundary 2 should relocate, redrawn along western boundary of site. Relocated boundary would join with boundary 2, and moor lane, following the route of a clear and established boundary. This would be more logical and defensible as a result.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. Object to the continued omission of the site from the emerging local plan. The revised methodology is flawed and unsound.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent is unconvinced the boundaries, with respect to the methodology, are justified, reasonable and ultimately sound.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council acknowledge in para 5.7 of TP1 2021, that as there are no towns within York authority area, the need to assess whether land should be kept permanently open to prevent neighbouring towns from merging does not arise. respondent has no objection.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned with the criteria in which the need to keep land permanently open only needs to be assessed against the first, third and fourth purposes.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to compactness, this outlines the need to retain the dense compact city or village form in an open or rural landscape. this is applied without regard to the facts of the situation, as many locations around the city cannot be described as being compact, as they have been expanded over many years by suburban development.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Flaw of the methodology is to include villages in the assessment question. Villages are not relevant to this purpose of including land within the GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent finds it difficult to understand how an assessment of every heritage asset, will ensure the fourth purpose has been duly considered.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent finds it difficult to discern why the significance of historic gardens is considered under this criterion, and it exemplifies a general confusion and conflation as to what is and what isn't historic, and how such ultimately contributes to the setting and special character of historic towns.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is unclear as to why the presence of nature conservation designations, historic or otherwise are considered under landscape and setting, and again how they relate to the fourth purpose of including land within the GB.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not understand how all three criteria have the potential to render the whole of the York authority area relevant to the fourth purpose. Respondent states this as confusing and an absurd assertion.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to purpose 1, respondent questions the criterion of urban sprawl. The proximity of the urban area is not in itself linked to sprawl or the presence of existing buildings/ farmsteads. By this, it lacks logic.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to purpose 3, respondent questions the criterion of encroachment as the council determines whether the land functions as countryside or not. The assessment would suggest that it should include every parcel of land outside the urban area. unclear how this assessment would aid one's understanding of whether or not land needs safeguarding from encroachment or what is truly countryside as opposed to land that has been influenced by urban development.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Overall, the respondent considers the plan to have not been positively prepared, land included within the GB has not been justified, it will not be effective and is not consistent with national policy.
934	Mulgrave Properties Ltd	Section 05 Housing	Site Allocation H28	Respondent does not consider the document to be sound. Object to the omissions of site H28.
934	Mulgrave Properties Ltd	Section 05 Housing	H1 Housing Allocations	Site H28 remains a logical and natural infill opportunity within the village and allocation of the site would infill the existing gap between development situated on Derwent Drive and valley view to the west, The Cranbrook's to the east and Main Street and North Lane to the south.
934	Mulgrave Properties Ltd	Section 05 Housing	H1 Housing Allocations	The allocation of the site H28 within the plan could be achieved without undermining or compromising the role and function of the York GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	No previous GB issues regarding the site H28 before by the council with regards to its omission. It is clear that the council have previously been satisfied that the site does not serve a material purpose for including land within the GB.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council will soon need to reassess the housing requirement using the standard method, thus more land will need to be required and therefore site H28 should be included in the LP as a housing allocation, or at least it should be identified as safeguarded land in anticipation of the review.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to compactness, the continued absence of development on the site does not aid one's impression of a compact city. The allocation of the site would not affect the compact form of York as a result. Respondent disagrees with the assertion that development beyond boundary 3 would diminish the compact form of Wheldrake.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	There are no landmark monuments within the vicinity of the site and therefore there is no intervisibility with the site and the development of the site will not impact on the intrinsic character of the village.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to landscape and setting, the site H28 does not lie within a protected landscape, form an area of public open space, and not does it form part of any other area which contributes to the setting of York. The site is bound by existing development on three sides.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to urban sprawl, respondent argues the development of the site would not give rise to the sprawl of a large built-up area. The development is simply infilling a vacant parcel of land which is bound by development on three sides.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to encroachment, the site H28 does not have the characteristics of land that could be deemed countryside. It is bound on three sides by the existing development and due to this and the dense vegetation it does not provide open views.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent argues H28 remains available and capable of accommodating housing growth. Contributes very little to the GB.
934	Mulgrave Properties Ltd	Section 05 Housing	H1 Housing Allocations	Site H28 is reinstated as an allocation within the emerging local plan to cater for the increase in housing requirement that is required in order to render the local plan sound.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound. OAN calculation of the housing requirement does not meet the need for market and affordable housing within the city of York.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent has repeatedly objected to the housing requirement used within the PDLP (2018) as it fails to meet the housing needs of the city.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The adoption of the OAN process is not sound as the standard method process is currently being used to calculate housing requirement.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's decision to continue to use the OAN process will result in a significant change to the local housing need figure once the standard method is used as part of a local plan review. Additional housing sites will need to be identified in order to fulfil this.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inevitable transition from the OAN process will result in further alterations to the GB boundaries within a maximum of five years following adoption of the emerging local plan.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement and evidence base are not justified, the local plan will not be effective in meeting the city's needs, it has not been positively prepared and the approach adopted does not reflect national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement is recalculated and should reflect a figure similar to that produced by using the standard method
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has repeatedly objected to the housing requirement used within the PDLP and have outlined the reasons why it fails to meet the housing needs of the city.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent estimates that using the standard method, the council would have to increase the housing requirement to over 1,000 dpa. A number of additional sites would be required.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Inevitable that the transition from the OAN process to the standard method will result in an increase in the housing requirement and therefore alterations to the GB boundaries.
934	Mulgrave Properties Ltd	Whole Plan	-	The housing requirement and evidence base are not justified, the local plan will not be effective in meeting the city's needs, it has not been positively prepared and the approach adopted does not reflect national policy

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement should be recalculated and will reflect a figure similar to that produced by using the standard method
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. Site H28 does not need to remain permanently open to preserve the character of the village or the special character of the City of York. It is clear that the GB boundary is not consistent with the requirements of NPPF.
934	Mulgrave Properties Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent suggests the GB boundaries are modified to encompass site H28. Boundary 3 is relocated, and redrawn along the northern boundary of the site. Boundaries 2 and 4 join up and this will form a more logical and defensible boundary as a result.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. Objects the continued omission of site ST29 and has the view that the revised methodology to determine GB boundaries is not sound in respect of the site.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent is unconvinced that the work undertaken by the council in respect to the methodology gives rise to GB boundaries which are justified, reasonable and ultimately sound.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does agree with the approach that because there are no towns within the York authority area, the need to assess whether land should be kept permanently open to prevent neighbouring towns from merging does not arise.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned by the use of the additional criteria to assess land against the first, third and fourth purposes of including land within the GB.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to compactness, the respondent is concerned by the need to retain the dense compact city or village form in an open or rural landscape. Just because land has not been built on does not make it important to the understanding of the special character of an area which is what the criterion suggests.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landmark monuments, the respondent finds it difficult to understand how an assessment of every heritage asset, as required under this criterion, will ensure the fourth purpose has been duly considered.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landscape and setting, the respondent finds it difficult to discern why the significance of historic gardens is considered, exemplifying a general confusion and conflation as to what is and what is not historic, and how such contributes to the setting and special character of historic towns.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is unclear as to why presence of nature conservation designations, historic or otherwise are considered under landscape and setting, and again how they relate to the fourth purpose of including land within the GB.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is unclear as to how all three of these criteria have the potential to render the whole of the York authority area. Not all land around a settlement will be important to this purpose of including land with the GB.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to purpose 1, finds this criteria as illogical as it would mean any existing building/farmstead would need including within the GB to reduce the chance of sprawl.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	With reference to purpose 3, respondent believes it is unclear how this assessment would aid one's understanding of whether or not land needs safeguarding from encroachment or what is truly countryside as opposed to land that has been influenced by urban development.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent views the emerging local plan as not being positively prepared, the land included within the GB is not justified, it will not be effective and it is not consistent with national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 05 Housing	Site Allocation ST29	Respondent does not consider the document to be sound and objects to the omission of site ST29 from the emerging local plan.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes that if site ST29 is not to be included within the emerging local plan as a housing allocation, it should be identified as safeguarded land in anticipation of the review
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent disagrees with the conclusion made by the council for omitting site ST29 as it provides an important role in the setting of York and its importance in separating the urban edge of York from Poppleton.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent believes the council have significantly overstated the need to keep the site open to preserve the setting of York by persons travelling towards the ring road from the city. There are various examples of existing built environment developments on the southern side of the A59, including Muddy Boots Nursery and car park and the petrol filling station and associated M&S simply food and McDonalds.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Based on the aerial photograph of site ST29, respondent believes this demonstrates that the allocation of the site would not extend the developed confines of York and Acomb any closer to Upper Poppleton than the consented Miller Appeal Scheme.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent maintains the site does not need to be kept permanently open, that it is suitable for housing development and that the green belt boundaries proposed at the PDLP 2014 are the most appropriate.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST29. With respect to compactness, there are already a number of existing buildings along Boroughbridge Road, which diminishes any sense of being within the countryside. The topography of the site, and the existing field boundary obscure views of much of the existing site and the buildings comprising the large swathe of built development comprising the edge of the city. The concentric form of the city and surrounding villages will be maintained. the scale of the site is small compared to the city of York and the identity of the city and surround villages will be maintained.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST29. With respect to landmark monuments, there are none within the vicinity of the site.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST29. With respect to landscape and setting, the site does not need to be kept permanently open as part of the wider landscape associated with the historic character and setting of York.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST29. With respect to the urban sprawl, the site is visually and physically well contained by the urban form and mature landscape features which encloses the site from the wider open landscape to the south and the land beyond the outer ring road.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST29. With respect to the encroachment, the site does not have the characteristics of land that could be deemed countryside. There is existing built development to the east and west and land to the north benefits from an extant permission for residential development.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST29. Respondent continues to object to the continued omission of ST29 as either an allocation or safeguarded land within the emerging local plan.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 05 Housing	Site Allocation ST29	Respondent suggests that site ST29 is reinstated as an allocation within the emerging local plan to cater for the increase in housing requirement that is required in order to render the local plan sound.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to the housing requirement as it fails to meet the needs of the city.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has concerns over the method used to calculate housing need. OAN is an old approach as the standard method is the one that is prevailing.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's decision to continue to use the OAN process will almost certainly result in a significant change to their local housing need figure once the standard method is used as part of a local plan review.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inevitable transition from the OAN process to the standard method will result in an increase in the housing requirement will result in further alterations to the GB.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are a number of deficiencies in the housing needs update. The housing requirement and evidence base are not justified, and the local plan will not be effective in meeting the city's needs. It has not been positively prepared and the approach adopted does not reflect national policy.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	To make the local plan sound, it is recommended that the housing requirement is recalculated and should reflect a figure similar to that produced by using the standard method.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound and objects to the housing requirement as it fails to meet the needs of the city.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has concerns over the method used to calculate housing need. OAN is an old approach as the standard method is the one that is prevailing.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's decision to continue to use the OAN process will almost certainly result in a significant change to their local housing need figure once the standard method is used as part of a local plan review.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inevitable transition from the OAN process to the standard method will result in an increase in the housing requirement will result in further alterations to the GB.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are a number of deficiencies in the housing needs update. The housing requirement and evidence base are not justified, and the local plan will not be effective in meeting the city's needs. It has not been positively prepared and the approach adopted does not reflect national policy.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Whole Plan	-	Respondent does not consider the document to be sound due to flawed methodology which has resulted in an unjustified boundary. Land included in the GB does not serve any GB purpose.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound and objects to the GB inner boundaries proposed around York with reference to ST29
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	Methodology is flawed, and is unjustified and unsound. The boundary is such that it includes land within the GB which does not serve any purpose of GB.
935	York Housing Association, Karbon Homes Ltd, & Karbon Developments Ltd	Section 03 Spatial Strategy	Policies Map (Green Belt)	The GB boundary should be modified to encompass the site ST29. This would be more logical and defensible. It would exclude land from the GB which has no need to be kept permanently open.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound due to flawed methodology which has resulted in an unjustified boundary. Land included in the GB does not serve any GB purpose.
936	Countryside Properties PLC	Whole Plan	-	Respondent does not consider the local plan to be sound, given omission of Site ST30

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST30 remains a logical and appropriate part of the city of York and it is plain that the site does not need to remain permanently open nor does it serve any GB purpose - a view shared by the inspector.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent agrees with the inspectors assessment of the site and sees no justifiable reason why the council should arrive at a different conclusion. Respondent feels there has been no material change to GB policy which would justify the council in reaching a different decision to that of the inspector.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST30 comprises of a number of smaller paddocks, as opposed to larger areas of land and remains enclosed to the north by an existing established field boundary and drainage ditch. It is bound to the east by a number of dwellings located on Pasture Lane in which the respondent objects to the 'intermittent' description of such dwellings by the council.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	Whilst the respondent strongly objects to the omission of ST30 in the emerging local plan as a housing allocation, it should at least be identified as safeguarded land in anticipation of the review.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST30. With respect to compactness, the absence of the site does not aid one's impression of a compact city. The site is more urban in character, given the presence of existing development located on Pasture lane, and situated on the north side of Stockton Lane. The site is not open and does not offer views to or from the countryside.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST30. With respect to landmark monuments, the development of the site would not impact views into the historic centre of York achieved from the Green Wedge - view of York minster is not affected. There is already significant expanse of intervening development between the site and York Minster irrespective of ST30.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST30. With respect to urban sprawl, unrestricted sprawl is not an issue given the site is bound by existing development to the west, the south and to the east. Pasture lane to the east contains a number of large, detached dwellings facing westward into the site.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST30. With respect to encroachment, the site does not have the characteristics of land that could be deemed countryside. site is bound on three sides by existing development and due to this and the dense vegetation it does not provide extensive open views into the green wedge, nor into or out of the city.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST30 remains available and capable of accommodating housing growth, contributing little if anything to the purposes of the GB, a view previously endorsed by the inspector.
936	Countryside Properties PLC	Section 05 Housing	Site Allocation ST30	ST30 should be reinstated as an allocation within the emerging local plan to cater for the increase in housing requirement that is required in order to render the local plan sound.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be sound. Objects the continued omission of site ST30 and has the view that the revised methodology to determine GB boundaries is not sound in respect of the site.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is unconvinced that the work undertaken by the council in respect to the methodology gives rise to GB boundaries which are justified, reasonable and ultimately sound.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does agree with the approach that because there are no towns within the York authority area, the need to assess whether land should be kept permanently open to prevent neighbouring towns from merging does not arise.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent is concerned by the use of the additional criteria to assess land against the first, third and fourth purposes of including land within the GB.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to compactness, the respondent is concerned by the need to retain the dense compact city or village form in an open or rural landscape. Just because land has not been built on does not make it important to the understanding of the special character of an area which is what the criterion suggests.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landmark monuments, the respondent finds it difficult to understand how an assessment of every heritage asset, as required under this criterion, will ensure the fourth purpose has been duly considered.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to landscape and setting, the respondent finds it difficult to discern why the significance of historic gardens is considered, exemplifying a general confusion and conflation as to what is and what is not historic, and how such contributes to the setting and special character of historic towns.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes it is unclear as to how all three of these criteria have the potential to render the whole of the York authority area. Not all land around a settlement will be important to this purpose of including land with the GB.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to purpose 1, finds this criteria as illogical as it would mean any existing building/farmstead would need including within the GB to reduce the chance of sprawl.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	With reference to purpose 3, respondent believes it is unclear how this assessment would aid one's understanding of whether or not land needs safeguarding from encroachment or what is truly countryside as opposed to land that has been influenced by urban development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent views the emerging local plan as not being positively prepared, the land included within the GB is not justified, it will not be effective and it is not consistent with national policy.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent does not consider the document to be sound and objects to the housing requirement as it fails to meet the needs of the city.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent has concerns over the method used to calculate housing need. OAN is an old approach as the standard method is the one that is prevailing.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's decision to continue to use the OAN process will almost certainly result in a significant change to their local housing need figure once the standard method is used as part of a local plan review.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inevitable transition from the OAN process to the standard method will result in an increase in the housing requirement will result in further alterations to the GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	There are a number of deficiencies in the housing needs update. The housing requirement and evidence base are not justified, and the local plan will not be effective in meeting the city's needs. It has not been positively prepared and the approach adopted does not reflect national policy.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	To make the plan sound it is recommended by the respondent that the housing requirement is recalculated and should reflect a figure similar to the produced by using the standard method.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the local plan to be sound. Rationale is focussed with respect to the GB boundary and site ST30.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent objects to the methodology used to define the GB boundaries with respect to the omission of site ST30.
936	Countryside Properties PLC	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The flawed methodology used by the council has resulted in a GB boundary which is unjustified and ultimately unsound. It includes land within the GB which does not serve any purpose of GB. The GB boundary is not consistent with the requirements of NPPF and is therefore unsound.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site ST30, is bound on three sides by existing built development and is perceptibly different in character from land to the north, which is vast and open and provides extensive views into and out of the city.
936	Countryside Properties PLC	Section 03 Spatial Strategy	Policies Map (Green Belt)	The GB boundary should be modified to encompass ST30, utilising the existing northern boundary of the site, and Pasture Lane to the east. This would follow the route of a clear and established boundary, and would be more logical and defensible as a result.
937	Private Individual	Whole Plan	-	Respondent considers the document to be sound.
937	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	No changes required. Rationale is worded exactly the same as SID937i/LC/CYC_59d/1
938	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Site 740 in question. Respondent considers the document to be sound. CYC's Topic Paper addressing their approach to defining York's Green Belt presents a more simplified approach to defining Green belt Boundaries. Respondent supports this approach as it more in line with National Policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
938	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Site 740 in question. Respondent supports the methodology for assessing Green Belt Boundaries outlined within the Topic paper as this seeks to follow the approach set out within the national Planning Policy Framework (NPPF)
938	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the notion that site 740 is excluded from the green belt boundary and believes this should be carried forward through the Local Plan examination.
938	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the view identified in Annex 4 that there are services and facilities within the Village of Copmanthorpe and therefore potential to provide a sustainable location for growth. Boundaries 4 & 5, whilst their importance in respect of preventing coalescence with Bishopthorpe is recognised, respondent supports the notion that CYC consider that there is opportunity for suitable development within this site.
938	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the proposed green belt boundary with respect to boundary 5, which now runs along the railway line to the boundary of the A64.
938	Private Individual	Section 05 Housing	Site Allocation ST31	Respondent requests that the site 740 (Yorkfield Lane) should form part of the draft residential allocation ST31.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
939	Friends of Strensall	Whole Plan	-	Respondent does not consider document legally compliant. Document is ambiguous, and is contrary to the intent of a transparent consultation that enables the public to make an informed input.
939	Friends of Strensall	Whole Plan	-	Respondent does not consider document to be sound. Ambiguity of plan means it has not been adequately justified.
939	Friends of Strensall	Whole Plan	-	Respondent does not consider document to be sound. Ambiguity of plan ensures uncertainty and raises the prospect for future ongoing disputes, so its not effective.
939	Friends of Strensall	Whole Plan	-	Respondent does not consider document to be sound. Ambiguity of plan means that it is not possible for a group of non-planning professionals to determine consistency with national policy.
939	Friends of Strensall	Whole Plan	-	Respondent does not consider document to be sound. Significant piecemeal development would be contrary to national policies for biodiversity, access to services, flood prevention, and a low carbon economy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Ex/CYC/59f (and the Local Plan as necessary) are reworded to keep the Green Belt boundaries as shown on pages A4:245 and A4:268. And for the avoidance of doubt/uncertainty, reference to alternative boundaries and parcels of land south of boundary 4 are removed.
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports CYC's New Local plan and the reasoned conclusion given A4:261 of Topic Paper 1: 'The majority of open land surrounding the village is therefore not suitable for development'. And support consequently the Green Belt boundaries shown in the maps on page A4:245 and A4:268, but request that the ambiguity and reference to alternatives for boundary 4 are removed.
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Request that the ambiguity and reference to alternatives for boundary 4 Strensall are removed.
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Page A4:261 'Some potential has previously been identified and considered to extend the village in areas where there are fewer constraints. This includes...between the village and railway line (Boundary 4)...' It is not clear what this means given the Green Belt Boundaries shown of Page A4:245 and A4:268. Nor are the possible implications of the wording given the Local Plan function of as the framework for future planning decisions. If this wording means that modifications can be made to boundary 4 during the plan, these modifications would be strongly opposed and the transparency of the local plan questioned.
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Prevent risk of legal challenge throughout life of local plan, respondent firmly requests that the wording is made clear and Boundary 4 is fixed to that shown on page A4:245 and A4:268. As there have been unsuccessful attempts to develop parcels of land between Boundary 4 and Flaxton Road that have in at least one instance been subject to failed appeal to the Secretary of State, 18 July 2016 APP/C2741/W/16/3154113.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent suggest any changes to boundary 4 Strensall would be a trojan horse to develop all the land south of the boundary, given the number of sites deemed to have potential (pages A4:264 to 266), and as shown by Site 119, page A4:264. The vagueness of the wording exaggerates this possibility of unsustainable development, therefore respondent reiterates their strong opposition to any changes to boundary 4.
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	The reasons to oppose further significant development south of boundary 4 are largely addressed in the 7 January 2016 CYC Area Planning Sub-Committee Report. The Committee's recommendation was to refuse permission for that proposed development (resubmitted) of site between 92 and 100 The Village Strensall. The decision making factors remain the same, and will be exaggerated if boundary 4 is modified to include larger parcels of land for development seemingly without justification. This would be contrary to Government Guidance on the National Planning Policy Network Para.136 that states, 'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation of updating of plans'.
939	Friends of Strensall	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York9	Since 2016 there have been further studies which include a detailed HRA, Waterman consultancy October 202. This reiterated the impact of increased visitor numbers on the common that would arise from additional dwellings in a zone of influence up to 5.5km (para.4.2.339) around our beloved SAC. Respondent also note that the result of an HRA was the reason given to remove ST35 and H59 from the Local plan submitted in 2018. In addition to the protected habitat of the Common, there is equally recognised biodiversity on the land south of boundary 4 which includes deer, barn owls, crested newts and tansy beetles.
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Imprecise wording concerning boundary 4 and the potential development implications. Contrary to planning professionals, this wording is not clear for the person in the street and is at odds with the transparency intent of the planning consultation process.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
939	Friends of Strensall	Section 03 Spatial Strategy	Policies Map (Green Belt)	Requests EX/CYC/59f and Local plan if necessary are reworded to keep green belt boundaries shown on Page A4:245 and A4:268. Respondent object to any changes to boundary 4 and request that reference to alternative boundaries is removed.
940	Private Individual	Whole Plan	-	The Evidence Base in relation to the National and Local economy is out of date and does not take into account major global and national changes. Unless the Evidence Base is updated, York will be unable to respond to the economic and commercial opportunities, to the detriment of local employment.
940	Private Individual	Whole Plan	-	Not considered in the Evidence Base – Changes in distribution, supply chain management and repatriation of businesses not reflected, thus the shortage of suitable sites for light industrial, industrial and warehousing
940	Private Individual	Whole Plan	-	Not considered in the Evidence Base – Not reflecting of structural changes in employment, in particular retailing, hospitality and the use of offices resulting from Covid and Brexit
940	Private Individual	Whole Plan	-	Not considered in the Evidence Base – Not reflecting the opportunities from changing Government policy to reallocate resources to the North or the impact of changing technologies

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
940	Private Individual	Whole Plan	-	Absence of a Local Plan has prevented York from providing the family housing required – the traffic generated and the employment opportunities relating to this housing is not reflected
940	Private Individual	Section 04 Economy and Retail	EC1 Provision of Employment Land	Allocate suitable additional land for Employment Use, particularly B1, B2 and B8 type uses
940	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Ensure that the Green Belt boundary is not too prescriptive
941	Private Individual	Section 05 Housing	Site Allocation H39	H39 sits within the Green belt and any development would have a detrimental effect on the rural nature of Church lane – part of which is already a designated conservation area. The site has previously been put forward and was rejected by the inspector at the local plan public enquiry. Disagrees that the plan has been positively prepared as more suitable sites have been put forward during previous consultations and drop in sessions held by the parish council. Given there is now the proposal to add a further 3,000+ houses in the Langwith Garden Village development on the west side of the runway of Elvington Airfield – no justification for a 30+ housing development in Elvington which will significantly alter the rural setting of site H39. Does not believe that the development of site H39 is consistent with the NPPF (para 136).

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
942	Private Individual	Whole Plan	-	Respondent considers document to be legally compliant but finds the document difficult for the reader to appreciate and comprehend in detail as there is no easily accessible summary
942	Private Individual	Whole Plan	-	Respondent concerned that commercially motivated organisations will gain an advantage over the engagement process as they have more time and resource than residents
942	Private Individual	Whole Plan	-	Respondent considers the document sound.
942	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Protection of these areas under purposes 1,3 & 4 is strongly supported. Essential to maintain boundaries 7 – 10 as they have proved to be valuable space and resource to the local community, contributing strongly to individual health and well-being. The local area already struggles with excessive traffic, therefore allocation of any of these areas to development will only make the issue worse with significant detrimental effects to the local area
943	Haxby St Mary's Parochial Church Council	Whole Plan	-	Consulting those who have previously contributed to the Local Plan is helpful and appreciated.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
943	Haxby St Mary's Parochial Church Council	Whole Plan	-	Respondent considered document to be sound. Amendments are mainly technical and provide clarification which is helpful Changes are just grammatical and technical, so improving the document.
943	Haxby St Mary's Parochial Church Council	Whole Plan	-	Consultation is of limited scope St Mary's Parochial Church Council wishes to remind City of York Council of ongoing concerns about infrastructure as set out in 2016 and 2019 responses. While recognising the need to balance progress and conservation the increased pressure on roads, schools and even more now on health care and GP services remain major concerns.
944	North Lane Developments	Whole Plan	-	Respondent does not consider the document to be sound, failing on the tests of effectiveness and being positively prepared.
944	North Lane Developments	Section 05 Housing	H9 Older Persons Specialist Housing	Respondent raises concerns in respect of its ability to deliver the aims set out in Policy H9. This policy, albeit supports the delivery of housing for older people, relies on sites being brought forward speculatively by developers. The current plan has only one allocation for specialist housing.
944	North Lane Developments	Section 05 Housing	H1 Housing Allocations	SHLAA update provides clear evidence that the needs of older people are not being met (only one site allocated), identifying a need for 84 specialist units per annum over the plan period. Only one site is allocated (relying on windfall sites). The plan will not be effective in meeting the identified needs of older people, thus the plan is not positively prepared. A policy is required that would support sites adjacent to settlement limits and in sustainable locations to meet the deficit.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
944	North Lane Developments	Section 05 Housing	H1 Housing Allocations	Just 34 homes for older people with limited care have been completed over the period 1st April 2018 – 31st March 2019. Which is just 40% of the annual target and an under-provision of 50 homes
944	North Lane Developments	Section 05 Housing	H1 Housing Allocations	Plan should identify sufficient sites to meet the housing need for elderly citizens
946	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers document legally compliant. Consultation on Topic Paper in accordance with relevant procedures.
946	Private Individual	Whole Plan	-	Respondent consider local plan to be sound. Consider plan positively prepared, effective, justified, and consistent with national policy.
946	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent agree with the Council's assessment set out in Topic Paper 1: Approach to defining York's Green Belt Addendum (2021) Annex 3: Inner Boundaries, Part 1: Section 1-4, Pages A3: 5 to 11.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
946	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Agree that it is not necessary to include Hoggs Pond within the Green Belt boundary in order to serve Green Belt purposes, specifically (1) to preserve the setting and special character of York (Purpose 4), (2) to check unrestricted sprawl (Purpose 1) or (3) to safeguard the countryside from encroachment (Purpose 3).
946	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent agrees that Moor Lane represents the definitive feature in the landscape where the suburban area terminates and meets the countryside.
946	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent agrees the Hogg Pond does not have a functional relationship with the wider countryside as it is enclosed, being surrounded by the urban area on 3 sides with the cluster of houses on the fourth side.
946	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent agrees with the proposed modification- that the green belt boundary runs along the southern carriageway edge of Moor Lane Woodthorpe.
947	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Document is misleading. Original map of Strensall shows the only change to be a re-drawing of a boundary line but the new document shows possible redevelopment behind respondent's property, which could have easily been missed due to the length of the document.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
947	Private Individual	Whole Plan	-	Strensall is supposed to be village but has seen extensive development over the year. Further development on Strensall will be overkill and change the nature of the village. The schools are already oversubscribed, traffic is already heavy, and the wildlife is important and should be protected.
947	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	It is not necessary to build more houses in Boundary 4, this land should remain as Green Belt as there are brownfield sites available which should be exhausted first. Allowing more development in Strensall will be detrimental to the nature of the village and contribute to more traffic, more risk of flooding and damage to wildlife.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns over the level of past under-delivery/shortfall given discrepancies between CYC figures and MHCLG figures, The reasons for the differences are not properly explained
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent recognises that the level of delivery required to fully address affordable housing need in York is unlikely to be achieved - however considers some uplift is still necessary.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that even though the delivery required to fully address need in York is unlikely to be achievable, a further 10% uplift to the OAHN to consider affordable housing need would be appropriate and realistic given the significant need identified. The 10% offers a streamlined approach which removed judgement and debate

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the use of the 10 year migration trend
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the modelling of the alternative internal migration scenarios
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent supports the application of accelerated headship rates to younger cohorts in calculating the demographic figure
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The Respondent does not consider local plan to be sound as it is not justified, positively prepared, effective, or consistent with national policy. The HNU is limited in its scope because it does not review the latest evidence on market signals within the City. Nor does it revisit the affordable housing need for the city, the mix of housing required, or the needs for specific groups. The housing requirement presented fails to meet the full OAHN, which is significantly higher than the council has estimated.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers the HNUs evaluation of, is not as robust as the PPG ID 2a-017 requires, and has only been partially completed. The demographic baseline assessment should also have considered the High International variant produced by ONS, which is more in keeping with longer term trends, but it did not. While previously the 2016 SNPP and MYE had been approximately aligned for international migration data this is no longer the case in the latest (2019) data. This is not analysed in the 2020 HNU. The respondent hypothesises that the high international growth could be as a result of higher education users especially at the universities

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
				and that this trend is likely to continue in the future and therefore these international migration figures should be used in determining the correct OAHN.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent questions using the ELR timeframes and data (2014-2031) and projecting this forward over a different time period (2019-2033/37).
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent questions the modelled job growth between 2017-19 as Nomis Job Density information for this period shows stronger growth than that factored in.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent challenges whether historic employment growth needs have already been met and that accommodation has already been provided to support that growth.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	In considering the implications for economic growth on the OAHN (within the HNU methodology), the respondent considers that historical economic growth trends should be considered, as York has previously been successful in boosting economic growth particularly between 2000 and 2017.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent disputes the scale of market signals uplift, principally because there is no sound basis to conclude that the uplift can be reasonably expected to improve affordability, and imbalances between the demand for and supply of housing will not be addressed by providing only for the level of growth produced by the continuation of demographic trends.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers uplift resulting from affordable housing need and from market signals analysis have been conflated. These are two separate steps in the practice guidance and should not be combined in this manner.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the growth in student numbers is not properly accounted for in calculating the OAHN as the growth in the 18-23 age cohort cannot be assumed to include growth in student numbers. The projections clearly indicate that they do not adequately reflect the Universities' student growth targets. The respondent questions why the methodology employed by GL Hearn for Guilford Borough Council, has not been applied here to account for a further uplift despite University of York and York St John being clear about their plans to expand and the councils knowledge of students in the private rented sector.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns that a substantial amount of C2 student accommodation is included within the completions data between 2012 and 2017 therefore reduces the amount of shortfall calculated. An example is given of 2 off campus privately managed student accommodation sites being included in 2015 where a mixture of self-contained and student flats with shared facilities were built – the figure reported does not account for this split.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns over the level of past under-delivery/shortfall given discrepancies between CYC figures and MHCLG figures – they do not feel the explanation given for this is sufficient.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises Concerns over the level of past under-delivery given a higher OAHN (1,010dpa) should have been applied to calculate shortfall
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers that there should at least be a sensitivity testing for long term international migration trends in the HNU based on 'specific local circumstances' as per PPG ID 2a-017.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent suggests an undersupply of employment provision should be considered for the years 2017-2019 in the economic growth considerations for the OAHN (within the HNU methodology), in the same way as it has been for housing.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent Suggests that if a demographic-based housing need figure of 803dpa is used no further upward adjustment is needed in order to align employment growth. Demographic based projections would support a reasonable level of employment growth at levels above that forecast by the ELR Scenario 2 and past trends.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent proposes market signals uplift is revised form 15% to 25 % or higher given the current sm2 uplift of 25%.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent proposes the Market Signals uplift should be applied to a revised demographic starting point, not the SNPP, given that GL Hern admit the 2018-based projections are less robust for York. This would lead to a need for 836dpa
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the growth in student numbers should be factored in to the OAHN - with 1,466 dwellings over the 16-year plan period this would equate to an additional 93dpa
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests MHCLG figures be used to calculate under supply increasing necessary uplift to 153dpa
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests a higher OAHN of 1,010 should be applied and this would identify a shortfall of 101dpa over 16 years. 9 creating a housing requirement figure of 1,111.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent raises concerns over inconsistent data sources and methodologies being used across the same Housing market area (Selby 2019 SHMA and the York 2020 SHMA update), including York employing the NPPF 2012 OAHN approach while Selby uses the standard method. This has resulted in both areas identifying the lower resulting OAHN for each area.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers that a joint SHMA between Selby and York should have been prepared given that they do share a joint housing market area and are part of the same travel to work area.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects to an OAN of 790 and the resulting Housing Requirement - questions are raised against several aspects of the methodology in reaching this figure which they believe should be higher (See further detail in comments relating to Housing Needs Update EX/CYC/43a)
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent considers that OAHN should be increased following changes to the methodology to 1,010dpa resulting in a target of between 1,042 and 1,111spa when adding in inherited shortfall.
948	Persimmon	Section 05 Housing	H1 Housing Allocations	The respondent states that the councils approach to lead-in times is not robust, particularly with regard to ST14 and ST15. The respondent also suggests it is unclear if any allowances for longer lead in times on larger sites have been made within the housing trajectory Evidence from Litchfield papers "Start to Finish" and "housing issues technical papers 2018 and 2019" are submitted to support this claim..
948	Persimmon	Section 05 Housing	H1 Housing Allocations	Respondent questions suggested delivery rates of proposed allocations as not being based on robust assumptions. Argued that build out rates cannot be simplistically multiplied based on the number of house builders or delivery outlets on a site. Delivery speed is shaped by local market conditions, economic conditions, proximity to competing sites, housing market area and type and quality units. While a site of 250 homes with one outlet might deliver 40dpa, a site up to 500 homes with two outlets might only deliver 65dpa. This is evidenced by work set out by Litchfield's "start to finish" report.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers the proposed gross to net ratios and assumed densities set out for sites in the trajectory are ambitious, do not allow for open space requirements, and will not be achieved. In the absence of specific developer information assumptions should err on the side of caution and this is not the case in the shlaa. There is particular concern that in suburban areas 40dph will not provide adequately sized family housing.
948	Persimmon	Section 05 Housing	H1 Housing Allocations	The respondent feels the council needs to adopt a more cautious approach when seeking to include strategic allocations within the 5 year supply – it is considered that a number of these do not have a realistic prospect of delivering housing in the next 5 years
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent argues that CYC may only have a 3YHLS based on a more realistic OAHN of 1,010dpa, reasonable adjustments to windfalls and the Sedgfield approach to backlog.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent supports the inclusion of a 10% non-implementation rate
948	Persimmon	Section 05 Housing	H1 Housing Allocations	Respondent accepts windfalls should be included in the overall housing delivery trajectory but only outwith the first 5-year period as its inclusion in earlier years is likely to artificially inflate the housing delivery figures in year 3 and does not account for potential delays to build out rates.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent questions using a windfall allowance figure of 182dpa when this figure has only been achieved 4 times in 10 years
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent raises concerns in the way in which the Council have calculated historic housing completions (shown within table 8 of the 2021 SHLAA Update) is flawed and is inflated through the inclusion of privately managed off-campus student accommodation that do not meet the varied housing needs of York's residents
948	Persimmon	Section 05 Housing	H1 Housing Allocations	The respondent considers that as a starting point the average lead-in times for development as set out within "the Litchfield "Start to Finish" paper should be used: 55-99 homes = 3.3 years, 100 to 499 homes=4 years, 500 to 999 homes=5 years, 1000 to 1499 homes=6.9 years, 1500 to 1999 homes = 7 years and 2000+ homes = 8.4 years.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent believes that in order to make appropriate provision to sustainably deliver housing in a timely manor to meet the city's full OAHN - further site allocations are required above and beyond those currently proposed in the Local Plan
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The respondent considers gross to net ratios between 60 % and 85 % would provide a more realistic basis for the provision on open space and infrastructure requirements on sites

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 05 Housing	H1 Housing Allocations	The respondent considers that in suburban areas the default density of 35dph should be used as is more achievable and more likely to provide family homes.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests further evidence on the prospect of delivering sites within the first 5 years should be provided
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that the detailed housing trajectory table – applying a non-implementation rate (Figure 2 of the 2021 SHLAA update) should also be included within the Local Plan as it sets out how the council housing supply has been derived.
948	Persimmon	Section 05 Housing	H1 Housing Allocations	Respondent suggests windfalls should only be included from year 6 of the plan (2025/26).
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests windfall allowance should be reduced from 182dpa to 102dpa due to the changes in the definition to previously developed land to remove garden sites and the surge in conversions created by changes to permitted development rights reducing out over time as locations become less available/attractive.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests the council should be employing the Sedgefield approach not the Liverpool method.
948	Persimmon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent suggests that given the significant level of historic under delivery, a 20% buffer should be applied to both forward requirement and under supply. The buffer does not become part of the requirement but provides a realistic prospect of achieving the planned supply through the provision of excess land to enable the requirement to be delivered.
949	York and Scarborough NHS Foundation Trust	Section 06 Health and Wellbeing	-	Respondent does not consider the document to comply with the duty to cooperate. Lack of engagement with the Trust as the services at York Hospital have not been considered with regards to the influx of new residents the Local Plan.
949	York and Scarborough NHS Foundation Trust	Section 06 Health and Wellbeing	-	Document CD020 LP Submission Draft Statement - The Trust want to collaborate with CYC and ensure that York and Scarborough Teaching Hospitals NHS Foundation Trust is one of the key consultees at all stages of the Local Plan going forward. CYC previously engaged with the Vale of York Clinical Commissioning Group regarding healthcare provision, but the York Hospital is facing pressures to meet demand in terms of access, A&E attendances, and other acute services. The increased population from the Local Plan projections will contribute additional strain on the Hospital services.
949	York and Scarborough NHS Foundation Trust	Section 06 Health and Wellbeing	-	Document CD020 LP Submission Draft Statement - The Local Plan should strengthen the sustainability and economy of York, accessibility to healthcare is an important aspect for residents therefore it is vital that improved hospital access should be accounted in York's future transport networks.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
949	York and Scarborough NHS Foundation Trust	Section 06 Health and Wellbeing	-	Document CD020 LP Submission Draft Statement - Accessibility to York Hospital is limited. The transport infrastructure surrounding the Hospital means traffic builds up easily and can cause a serious issue to patient visiting times, but the Local Plan could have a significant impact in terms of increasing demand for hospital services, so it is important that CYC cooperates with the Trust and integrates a low-carbon, sustainable transport option to connect all parts of the city.
949	York and Scarborough NHS Foundation Trust	Section 06 Health and Wellbeing	-	Document CD020 LP Submission Draft Statement - Local Plan suggests the need for a new York Hospital facility to meet the increased populations' healthcare needs, therefore integrated and accessible transport infrastructure must be factored into development.
949	York and Scarborough NHS Foundation Trust	Section 06 Health and Wellbeing	-	Document CD020 LP Submission Draft Statement - the Trust would like to be involved in discussions regarding Section 106 monies to help prepare and adapt their existing facilities to cope with the increased demand.
949	York and Scarborough NHS Foundation Trust	Section 06 Health and Wellbeing	-	Document CD020 LP Submission Draft Statement - The York Local Plan will result in thousands of new homes which will have a direct impact on the Hospital's capability to deliver effective healthcare and the current main premises are at full capacity. The Trust and CYC must collaborate closely to ensure future developments result in positive outcomes.
950	Kyle & Upper Ouse Internal Drainage Board	Section 12 Environmental Quality and Flood Risk	-	Respondent considers the document to be sound. On behalf of their client, the 'Sustainable Drainage Systems Guidance for Developers has been reviewed and is sound. Whilst respondent believes the document is sound, proposed guidance is suggested for future development applications.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
950	Kyle & Upper Ouse Internal Drainage Board	Section 12 Environmental Quality and Flood Risk	-	Respondent suggests the following guidance: "All developments planning work in, on under or near ordinary watercourses or discharging surface water into a watercourse within the defined drainage district require consent from the Board under the Land Drainage act 1991 in addition to, or as part of, any Planning permission."; "No increase in surface water discharge rate or volume...No obstruction to flow within a watercourse"; and no obstruction above ground within 7 meters of the edge of a water course bank to
951	Stephensons	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not consider the document to be legally compliant. rationale relates to soundness - Section 6, Boundary 21 and 22 do not consider all factors of the landscape.
951	Stephensons	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:442) Respondent does not consider the document to be sound. Respondent believes Section 6, Boundary 21 and 22 to be assessed on subjective matters and does not consider the opportunity of potential development on the site and creation of a new Green belt Boundary - A64. Respondent argues this boundary A64 would be defensible and the site contained within this area represents a sustainable location for development - in accordance with the NPPF.
951	Stephensons	Section 03 Spatial Strategy	Policies Map (Green Belt)	Inner area boundary needs amending, whereby boundaries 21 and 22 are altered to where the A64 acts as the boundary instead.
952	North Yorkshire County Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With reference to Policy SS1, respondent acknowledges and welcomes the revised dwellings per annum figure being produced utilising evidence that considers the implication for the York Housing figures should the Government Standard Methodology have being applied.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
952	North Yorkshire County Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Whilst the respondent acknowledges the greater degree of confidence associated with housing figures in line with the new methodology, this Government standard is being reviewed and therefore the plan should ensure sufficient flexibility to accommodate any changes that do arise within the plan period and beyond.
952	North Yorkshire County Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Whilst the respondent acknowledges the approach defined in document CYC_59i regarding the process of defining the GB, there is reiteration from the respondent that if the GB is drawn too tightly at this stage there may be insufficient land available to meet the city's long terms needs - resulting in the need for an early GB review. Thus, CYC would need to be confident the approach provides sufficient flexibility.
952	North Yorkshire County Council	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With regards to document CYC_38, respondent welcomes the position of CYC to meet its own Objectively Assessed Needs (OAN) within its own administrative boundaries.
952	North Yorkshire County Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	With regards to document CYC_59b, the respondent welcomes the defining of the outer boundary in adjoining already established boundaries as this would prevent urban sprawl from within the city encroaching on areas adjacent to the NYCC boundary.
953	Private Individual	Whole Plan	-	Respondent does not consider the document sound. Not considered positively prepared, justified, effective or consistent with national policy.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent writes on behalf of owner of West Cottage, Wetherby Road Rufforth, located on the eastern side of Wetherby Road on the Northern edge of the village. Within the 30mph speed sign and village sign. Client considers that the property falls within the villages. Respondent agrees and therefore strongly objects strongly to the proposed exclusion of this property from the defined development limit and the proposed inclusion within Green Belt.
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Object to the council's assessment of and proposals for the Green Belt boundaries to the North Rufforth.
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondents clients property includes small parcel of land located between West cottage and the next property located to the south. Land falls within the village. Council states that the property is isolated from the village, it is not. It is located within the 30mph speed and village signs. Forms part of the linear character of the village as described by the council in its assessment. It is not located outside the village in wider or more exposed open countryside. It is located close to the road and in close proximity to existing built development to the south.
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Council linked West cottage with former allotments- it also refers to it as an isolated property with a higher degree of openness. Property has nothing to do with the former allotments (which is agricultural land), likewise it is no more open than other development on the eastern, southern and western side of the village which are proposed to fall within the defined development limits (and thus outside of Green Belt). West Cottage is closer to the historic core of the village (the area near the Church) than the modern housing estate located at the southern extent of the village (Southfield close) which is proposed for inclusion within the development limit.
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Inclusion of the property within the development limit and outside the Green Belt would have no material or harmful effect on the compactness of the village or on important landmarks, nor on the ability to create a permanent Green Belt boundary.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Not a sound approach to exclude West Cottage from the village and include it within the boundary of the Green Belt. Make the development Plan sound the Green Belt boundary should be amended to exclude West Cottage and the small land parcel south of it. There would be an inconsequential impact on the Green Belt and the purposes of including land within it. Includes image of new proposed boundary.
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Property and its curtilage and the small adjacent parcel of land make no contribution to the historic settings of the city and are not needed to control urban sprawl or to prevent encroachment into the open countryside. A tightly defined development limit is an equally effective mechanism and a very modest and inconsequential change to the proposed development (Green Belt boundary) limit would achieve this.
953	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Property and its garden curtilage (and small wooded area directly south) do not contribute to the openness of the Green Belt and therefore this property should reasonably fall within the village boundary and not with the Green Belt.
954	York Green Party	Whole Plan	-	York Green Party still believes that there are shortcomings in the ambition in York's submitted Local Plan, particularly stronger requirements for sustainable transport provision and urgent actions to tackle the climate emergency are missing.
954	York Green Party	Whole Plan	-	Despite respondents reservations regarding some of the policies, believe that York needs a Plan in place as soon as possible to protect the city from speculative development proposals such as the recent applications to build on York's Green Belt.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
954	York Green Party	Whole Plan	-	Over the years City of York Council has regarding this plan proposal and the previous proposals engaged constructively, actively and on an ongoing basis with residents, councillors and political groups of all different colours and followed due process and statutory regulations.
954	York Green Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent strongly support the inner and outer boundaries of the York Green Belt as proposed. Respondent believes they are considered and balanced, fit for purpose of sound planning and development and showing good judgement.
954	York Green Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The inner parts of the Green Belt, the Strays and the Green Wedges like the banks and floodplains of the Ouse like Nun Ings are essential for the character and heritage of York and crucial for the adaptation to climate change by cooling and exchanging the air in the population centres.
954	York Green Party	Whole Plan	-	To delay this odyssey plan further would be irresponsible – the Local Plan, once established, should be reviewed as soon as possible, although the ‘extent’ of the Green Belt will be set till 2037.
954	York Green Party	Whole Plan	-	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Prioritise the provision of affordable housing

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
954	York Green Party	Whole Plan	-	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Require zero-carbon development and the provision of cheap to run, warm homes.
954	York Green Party	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Provide options to even out housing densities across the city – higher densities in some locations, when combined with excellent sustainable design, can help to protect our green spaces and provide high-quality affordable homes
954	York Green Party	Section 04 Economy and Retail	EC1 Provision of Employment Land	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Ensure a sufficient supply of sites for a wide range of employment opportunities
954	York Green Party	Whole Plan	-	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Protect and enhance green spaces across the city including the city centre.
954	York Green Party	Whole Plan	-	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Provide a sustainable transport infrastructure capable of supporting the level of development in the Plan

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
954	York Green Party	Whole Plan	-	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Include a range of other policies to enable us to protect local shopping parades, independent businesses and the balance of our city centre
954	York Green Party	Whole Plan	-	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Be reviewed at least every 5 years to assess if it is on track to meet priorities for the city including our clean air and carbon reduction targets.
954	York Green Party	Whole Plan	-	Despite being in agreement that this proposal is legally compliant and sound, but York Green Party continues to argue for the Local Plan to: Include necessary Supplementary Planning Guidance to protect York's future and natural environment.
955	Jomast Developments	Whole Plan	-	Respondent does not consider the local plan to be sound as it fails all tests of soundness; consistency with national policy, effectiveness, justification and being positively prepared.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The adoption of the plan is not likely until 2023. By then, 6 years have passed leaving an operational plan period of just 10 years.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	5 years post plan period for development, leaves only 15 years after the adoption of the GB. this is well short of the permanence for GB boundaries required by national Planning Policy.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The council's overall assessment of its housing requirement remains fundamentally flawed and does not make adequate provision for housing land supply
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The plan is over-reliant on a small number of isolated strategic housing allocations to meet housing need and especially the critical affordable housing need
955	Jomast Developments	Section 05 Housing	H1 Housing Allocations	The proposed housing allocations cannot deliver the houses the city needs. Strategic allocations cannot deliver the intended numbers
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Delivery of affordable housing will fall significantly short of what is required to meet the acute the need in York. Completions on strategic sites will occur later in the plan period than anticipated by the council.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A substantial amount of additional housing land will need to be allocated if the council is to meet its identified housing requirement and confirm and permanent GB for York.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to being positively prepared, there is a lack of adequate provision for housing supply which is inconsistent with the local plan strategy to meet objectively assessed development requirements.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to justification, the councils overall assessment of its housing requirement remains flawed - proposed housing allocations cannot deliver the houses the city needs. Plan does not represent the most appropriate strategy when considered against reasonable alternatives.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to effectiveness, there are significant flaws in the plan, including those relating to the plan period, housing requirements and need for additional housing land which will prevent the plan being effective and deliverable.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement must be increased to more accurately reflect the house needs of the city

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	A reset of the plan period so that the start of the plan period is more closely aligned with the likely adoption date of the plan.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Key Diagram CYC/46 is unsound because it does not exclude sufficient land from the GB to meet the development needs and provide permanent GB boundaries
955	Jomast Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to consistency with national policy, the plan is not consistent with national policy for meeting identified requirements for sustainable development, and will not deliver a permanent GB.
955	Jomast Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:473) The council's approach is flawed and the emerging local plan is unsound in relation to the proposed inner GB boundaries specifically around the land at new lane (site 169)
955	Jomast Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	The council's assertion that the land serves each of the three GB purposes relevant to York is disputed, the assessment in cyc/59d does not provide any compelling evidence to support the conclusion that is necessary for the land to be kept permanently open.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
955	Jomast Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to being positively prepared, the proposed GB boundaries and inclusion of the New Lane site is inconsistent with the local plan strategy to meet objectively assessed development requirements.
955	Jomast Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	With respect to justification, the proposed inclusion of the site within the GB is not justified when considered against the council's own evidence. Land does not serve the three GB purposes relevant to York, and there exist alternative options for robust boundaries that would provide a more enduring GB.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to effectiveness, the proposed boundaries will inhibit the requirement to meet housing needs and will not provide a permanent GB.
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	With respect to consistency with national policy, GB boundaries will not facilitate the delivery of sustainable development in accordance with the policies in the framework. Requirements para 85 of the 2012 NPPF have not been correctly interpreted.
955	Jomast Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	(site 169) Amend the GB boundaries adjacent to the land at new Lane to utilise the well-defined and permanent boundaries to the south of the site

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
955	Jomast Developments	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Plan should not include land which it is unnecessary to keep permanently open, and provide GB boundaries which are consistent with the requirement to meet sustainable development needs.
955	Jomast Developments	Section 05 Housing	H1 Housing Allocations	Site 169 should be re-instated. It represents a viable and deliverable residential site that will provide a significant level of affordable housing of circa 135 units, making a valuable contribution to York's acute affordable housing need
955	Jomast Developments	Section 05 Housing	H1 Housing Allocations	Site 169 should be re-instated. It will be made available in the short-to-medium-term, contributing to the delivery of affordable housing within the early years of the plan, which is a shortfall in the current version
955	Jomast Developments	Section 05 Housing	H1 Housing Allocations	Site 169 should be re-instated. It forms a logical and sustainable in-fill affordable housing site that would be in accordance with the council's strategy of prioritising development within urban areas.
955	Jomast Developments	Section 03 Spatial Strategy	Policies Map (Green Belt)	Site 169 should be re-instated. It would not have an adverse impact in relation to the setting and special historic character of York, nor encroach into the open countryside or otherwise impact on the openness of the GB.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
956	Peter Vernon	Section 05 Housing	H1 Housing Allocations	Respondent considers the projected delivery rates of affordable housing as unrealistic when pitched against the historic delivery of affordable housing. It involves an overreliance on an early contribution from strategic sites representing 71% of its overall target.
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A4:219) consideration is only given to the village of Skelton and ignores the outlying areas, particularly land adjacent to A1237, and Rawcliffe Bar and the Rawcliffe Bar Park & Ride. Rawcliffe Bar is not even considered as part of the Topic Paper, yet represents an obvious and sustainable opportunity.
956	Peter Vernon	Section 05 Housing	H1 Housing Allocations	Respondent considers the housing trajectory to be flawed, as it assumes an unrealistic contribution from early windfall sites which are likely to take 4 to 5 years to deliver. Includes extremely high contributions from larger sites at the back end of the plan period. Size and complexity of delivery results in an unrealistic assumption meaning the CYC will not be able to meet its housing needs target.
956	Peter Vernon	Section 05 Housing	H1 Housing Allocations	The Council needs to include additional deliverable sites in order to be able to meet its need.
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A4:334) Askham Byran College is washed over by the GB, rather than inset. It is a major city and CYC have historically permitted its further development. The college should be inset as the settlement area would justify expansion of the settlement into the land shown on the attached plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A4:301) The settlement boundary should be further extended to the south.
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:282) Plans used within the document do not show the physical existence of the Park and Ride to the south of the A59. Impact and opportunity of the P&R is not taken into consideration.
956	Peter Vernon	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	(A3:282) Dividing consideration into GB Addendum of specific settlements and sections means that its assessment of the GB has not been comprehensive in particular with regards to a site to the North of North Minster Business park and Poppleton
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:282) Site has been the subject of previous representations, none of which have ever been acknowledged or considered by CYC in breach of its legal requirement to be sound.
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:282) respondent opposes to the CYC putting the Park and Ride to the south of the A59 into the GB, following the road as the boundary. If it is correctly excluded from the GB it would mean the adjoining White land should not be considered as GB, nor taken into the GB as a consequence of this proposed plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:282) The land should allow for future sustainable growth in a location adjacent to employment and Park and Ride to the south of the A59 is the kind of location CYC should be allocating.
956	Peter Vernon	Section 03 Spatial Strategy	Policies Map (Green Belt)	(A3:282) The consideration of this settlements boundaries ignores the status of adjoining land in Selby District that is adjacent, identical in use and status, yet is not designated as Green Belt, which illustrates the arbitrary nature of CYC's approach to land that needs to be within the Green Belt and suggests that the settlement boundary should be further extended to the south.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Whole Plan	-	Respondent does not consider the document to be sound as it fails on the test of soundness with respect to justification.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 05 Housing	Site Allocation ST7	Respondent objects to the allocation of site ST7 as it is. Believes it is too small and may not be capable of fulfilling needs expected by the council. Access roads to the site are too long and costly.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	Does not accept the land between the allocation and the edge of the main urban area needs to be GB and request an expansion of ST7.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Dwellings delivered are unlikely to be able to sustain community facilities sought by the council which then may undermine the principal of the garden village.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Respondent objects the council's approach to identifying Local Housing need and the continued use of the 2018 projections despite the PPG requiring the use of the 2014 based household projections.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The housing requirement is increased to reflect the most up to date Standard Method.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Implications of fixing a housing requirement via the local Plan that is lower than justified has significant implications for York and will lead to the worsening of an already severe affordability situation.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Likely that the housing requirement will be increased in future reviews, therefore continuing to restrict the housing requirement now will make it increasingly difficult to deliver a potentially significant increase in housing requirement via future reviews.

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957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Lichfield's critique concludes that the LP Housing requirement fails to meet the full OAHN, which is considered to be significantly higher than the Council has estimated.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 05 Housing	Site Allocation ST7	ST7 should be expanded to contribute to meeting the housing requirements.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York2	Respondent has no objection to the amended policy wording for the site, as there are a number of specific measures that the site would deliver that will reduce the need and desire for future residents to visit Strensall Common to a negligible level.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 09 Green Infrastructure	GI2 Biodiversity and Access to Nature	Strategic issues such as the disposal of waste water are effectively screened through adhering to the requirements of Local Plan Policy GI2
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	The GB methodology is not a standard approach to appraising against the NPPF GB purposes.

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957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST7. Assessment does not define parcels of land and so is unable to quantify how much land extending from the suburban edge should be kept open to safeguard against sprawl, encroachment.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST7. Assessment does not appear to take account of the proposed freestanding settlement which would be located directly to the east of these boundaries and therefore no judgements have been made as to how much land should be kept open between the existing suburban edge and the proposed new settlement.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	Designate land as a strategic or local Gap to ensure that a sense of separation between the edge of York and the proposed freestanding settlement ST7 remains.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	Further analysis should be undertaken to understand the openness of land between the suburban edge and the proposed freestanding settlement (ST7).
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Outcomes of the methodology are not substantively different to that presented in the 2019 TP1 Addendum documentation

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957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	Criticisms of how the council's methodology regarding the 5 criteria relates to the bearing of purpose 4 of GB. In relation to landmark monuments, not all views of the Minster will contribute in the same way to the understanding and significance of the historic core.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York	It is not considered the methodology is robust in identifying GB boundaries that would serve the function of purpose 4 of GB.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	Land west of ST7 is not identified as an area contributing to the special character and setting of York. Every one of the boundaries adjacent to the inner boundary relevant to the land west of ST7 is located directly abutting modern development.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent does not agree that the land in between the existing urban edge and ST7 will preserve the perception of a compact city in a rural hinterland.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	Inadequate justification for the inclusion of the area of land west of ST7 within the GB. Justification for the boundaries is weak. It has not taken into account the context of the area which would be a thin wedge of land between two areas of modern development.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	ST7. Current boundary should be expanded in order to enhance the community and green infrastructure that the site can deliver in respect of the policy aspirations required by Policy SS9.
957	Barratt Homes, David Wilson Homes, TW Fields (ST7 consortium)	Section 03 Spatial Strategy	Policies Map (Green Belt)	In relation to heritage considerations, it is concluded that there is inadequate justification for the inclusion of the area of land west of ST7 within the GB. Land does not demonstrate essential characteristics of GB.
958	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent has concerns with the defining of the GB boundaries
958	Private Individual	Section 03 Spatial Strategy	SS1 Delivering Sustainable Growth for York3	Request for details on the proposals policies map, noting the key diagram (and other support documents do not show any primary access to the A64. In order to comment properly it needs to be clear what is being proposed.
958	Private Individual	Section 05 Housing	Site Allocation ST15	Concerned how ST15 residents would access York and the A64. Both arterial routes into York from this direction are currently heavily with no spare capacity. Without a clear transport plan this proposal should not even be in the local plan.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
959	Clifton (Without) Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the defining of the GB boundaries
959	Clifton (Without) Parish Council	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the defining of the GB boundaries especially with respect to the area of Clifton (Without).
960	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the defining of the GB boundaries
960	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Respondent supports the defining of the GB boundaries especially with respect to Dunnington.
961	Private Individual	Section 05 Housing	Site Allocation ST33	Objection to ST33 in respect of the number of dwellings proposed. Proposal for ST33 is totally out of keeping within the village of Wheldrake which has already been developed beyond the capacity its infrastructure is able to cope. Residents of the village acknowledge the need for additional housing, but the proposal to build 147 dwellings is unnecessary and way above the magnitude that the village can cope with - development must be restricted to the area contained within the brownfield land. The roads in Wheldrake are unsuitable for the increase in traffic that would follow with such large-scale developments such as in Escrick and Elvington.

SID	Respondent	Plan Section	Related Policy/ Site Allocation(s)	Summary of Comments
961	Private Individual	Section 05 Housing	Site Allocation ST33	If ST33 progresses further, it would result in an incursion of the established Green Belt and a loss of agricultural land at a time where this is a world shortage of food products. Priority of housebuilding must be confined to brownfield land.
961	Private Individual	Section 05 Housing	Site Allocation ST33	Opportunity for the proposed Garden Village to remove the need to over develop the adjoining land and villages, whilst ensuring that some limited house building can be planned without destroying their character and changing the whole nature of the surrounding villages.
961	Private Individual	Section 03 Spatial Strategy	Policies Map (Green Belt)	Essential that the Local Plan is established without the need to concrete over unnecessary parts of the Green Belt and to ensure that every parcel of brownfield land is developed before any consideration is given to a single square metre of the green belt is exploited.