



City of York Local Plan

**Reg 22 Consultation Statement Addendum
Proposed Main Modifications Consultation
June 2023**



Purpose of Report

- 1.1 As part of the ongoing examination of the City of York Local Plan, the Inspectors asked for consultation to be carried out on the Proposed Main Modifications they consider may be necessary in order for the Local Plan to be found 'sound'. A number of other documents were also consulted on as part of the Proposed Main Modifications consultation, including evidence published since previous consultation on proposed modifications (Sept 2021).
- 1.2 The Proposed Main Modifications consultation ran for 6 weeks from 13th February to 27th March 2023.
- 1.3 This consultation statement provides a high-level summary of the main issues raised during the consultation and appends a brief summary of all duly made representations. It provides an addendum to the submitted City of York Local Plan Consultation Statement (May 2018); it therefore does not restate its previously published summaries of consultation (which are set out in CD13A Regulation 22 Consultation Statement, May 2018, EX/CYC/22 Regulation 22 Consultation Statement update September 2019 and EX/CYC/65 Regulation 22 (c) Consultation Statement Addendum September 2021). All documents can be found on the New Local Plan website <https://www.york.gov.uk/LocalPlanExamination>
- 1.4 This statement has been prepared in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Its purpose is to show how we have met the legal requirements for consultation.
- 1.5 Regulation 22 (1) (c) requires a statement setting out:
 - i) which bodies and persons the local planning authority invited to make representations under regulation 18;
 - ii) how those bodies and persons were invited to make representations under regulation 18;
 - iii) a summary of the main issues raised by the representations made pursuant to regulation 18;
 - iv) how any of those representations made pursuant to regulation 18 have been taken into account;
 - v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
 - vi) if no representations were made in regulation 20, that no such representations were made.

2. Who was invited to make representations

2.1 Formal notification of the consultation was given on 13th February 2023 and representations were invited for a 6-week period ending midnight on 27th March 2023. In accordance with the Council's Statement of Community Involvement consultation arrangements included the following:

- Emails/letters informing consultees of consultation dates and how to view and respond to the consultation material were sent out at the start of the consultation period. This included all representors from earlier stages of plan-making who had not withdrawn their interest, internal colleagues and other specific and general consultation bodies. Copy correspondence, including the enclosed Guidance Note, is at appendix A;
- Formal notice was given at the Council's West Offices (appendix B)
- An advert was placed in the York Press at the start of the consultation period, providing details of the consultation, including where the consultation documents would be made available to view (appendix B);
- A press release was issued, resulting in local press coverage (appendix C).
- All documents were made available on the Council's website, with hard copies available to view at the Council's West Offices;
- Posters were sent to local libraries and Explore centres to publicise the consultation and explain how to view the documents and make comments (appendix D).
- Notice was given via the Council's social media channels;
- A consultation portal was set up on the Council's website, hosting all consultation material and the response survey
<https://www.york.gov.uk/planning-policy/local-plan-proposed-main-modifications-consultation-february-2023>

3. Duty to co-operate

- 3.1 The Council maintains active engagement with neighbouring authorities and other specific consultees. All relevant bodies were notified of the consultation and invited to respond.
- 3.2 As is shown in the published Statements of Common Ground, the Council has maintained ongoing engagement to resolve a number of outstanding strategic matters leading up to, and as part of, the Examination hearing sessions (see <https://www.york.gov.uk/planning-policy/local-plan-examination-library-statements-common-ground>)

4. Method of response

4.1 A Statement of Representation Procedure was published which provided details on how to make representations; a copy can be found at appendix A. Representations could be made in writing or by electronic communication, via the following means:

- via our online survey at <https://www.york.gov.uk/consultations> (see appendix E).
- by requesting a response form, returnable by post or email.
- Emailing localplan@york.gov.uk

5. Summary of main issues raised

- 5.1 There were 585 representations received on the Proposed Main Modifications consultation from 131 respondents (Appendix F lists all respondents).
- 5.2 The following tables provide a high-level summary of the most significant issues raised through the representations. The Council's response to these matters is presented in a separate document, available on the examination website.
- 5.3 A summary of all duly made representations received is set out in Appendix H, grouped in main modification order and in response to individual consultation documents. It does not replace the content of submitted representations which are provided in full to the Inspectors for their consideration.
- 5.4 A number of responses received were incomplete or did not relate to the Proposed Modifications consultation; these are considered non-duly made. Non-duly made responses do not form part of the consultation summaries but are summarised for information at Appendix I. The full non-duly made responses are to be submitted to the Inspectors.

Section 5: Housing

MM5.11 and MM5.12 Policy H5: Gypsies and Travellers

The Travellers Trust raise a number of concerns with the Plan's approach and evidence base:

- That it is inconsistent with national policy to treat those that meet the definition and do not meet the definition of travellers the same.
- That no suitable sites are provided to deliver 5 year need, and no developable sites thereafter.
- The policy obligations are unenforceable.
- Part b) is geared to meeting affordable provision.

The York Human Rights City Network raises the further concerns that the approach breaches the Council's obligations under the Human Rights Act and the Equality Act 2012.

Other parties question the justification and evidence behind the policy approach to require strategic sites to provide land for the provision of Traveller sites, instead supporting off-site provision via commuted sum payments and upgrade/reprovision of existing Council run sites. Rachael Maskell MP and the York Labour Party oppose the increase of pitches on existing Council sites, which are already large and considered not to have suitable community facilities.

List of MM ID/Name

- 60 MH Planning obo York Travellers Trust
- 365 Rachael Maskell MP
- 208 Rapleys obo British Sugar PLC
- 255 HBF
- 585 Johnson Mowat obo Taylor Wimpey
- 594 Paul Butler obo TW Fields

- 825 Cllr Warters
- 886 York Labour Party
- 966 Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd
- 982 York Travellers Trust
- 987 Steven Pittam obo York Human Rights City Network

Section 5: Housing

MM5.15 and MM5.16 – Policy H5 and H6 Explanation

The Travellers Trust object to the lack of assessment of the needs of boat dwellers, contrary to NPPF and the Housing Act. Further, they raise concerns with the Plan's approach and evidence base:

- That it is inconsistent with national policy to treat those that meet the definition and do not meet the definition of travellers the same.
- That no suitable sites are provided to deliver 5-year need, and no developable sites thereafter.
- Policy obligations are unenforceable.
- Part b) is intended to meet affordable provision.

List of MM ID/Name

- 60 MH Planning obo York Travellers Trust
- 982 York Travellers Trust

Section 5: Housing

MM5.17 and MM5.18 Policy H7: Student Housing

Responses raised concerns related to:

Nomination agreements (criterion iia): Considered by many respondents to be unnecessary to make the plan sound and not required given criterion i of the policy demands applicants demonstrate need for PBSA. The principle would see the financial risk transfer from the developer to the university. Alternative policy approaches that require that rent is negotiated between developer and university considered more appropriate.

Restriction to full time students (criterion iv): Change to semesters requires accommodation to be available all year. The requirement is unduly restrictive, and limits use by those in part time education and out-of-term letting.

Affordable housing contribution: several responses challenge the rationale for affordable housing contribution on PBSA sites and contend that the requirement is not consistent with NPPF. Many consider that the associated cost will be recouped via higher rental charges, which will impact on students' cost of living. It is also suggested that available headroom should be retained to contribute to affordability of student housing.

List of MM ID/Name

- 365 Rachael Maskell MP
- 849 O'Neill's obo University of York
- 886 York Labour Party

- 901 O'Neill's obo York St Johns
- 964 Watkins Jones Group
- 965 ROK Planning obo Danehurst Development
- 973 Pearce Planning obo Fusion Students
- 975 O'Neil's obo Helmsley Group
- 976 O'Neil's obo Foss Argo Developments
- 991 Quod obo IQ Student Accommodation
- 1012 Merrill Davis

Section 9: Green Infrastructure

MM9.6 Policy G12a: Strensall Common Special Area of Conservation (SAC)

Natural England considers the policy sound. Recommend that a Supplementary Planning Document (SPD) is prepared to provide detailed guidance on how policies or proposals will be implemented and will link with policies G12a and G16. Should also include financial contributions, principals in NPPF for GI and guidance on BNG within the SPD.

DIO object to the addition of this policy. In summary: disagree with CYC's in-principle concerns over development within 400m of Strensall Common; 400m distance is not justified with evidence and can be mitigated; If site allocations ST35 and H59 are deleted, the obligations under the Habitats Regulations in relation to such development are not arguably engaged by the Plan and therefore would be positively unlawful for policy to be adopted by way of a main modification (and to do so would render the plan as a whole unlawful).

List of MM ID/Name

- Avison Young obo DIO
- 383 Natural England

Section 8: Placemaking, Heritage, Design and Culture

MM8.7 Policy D5: Listed Buildings

The reference to securing a sustainable future for a building, previously included as a separate statement within the policy, has been tied to the statement on change of use – request this reverts to wording as agreed in SoCG.

List of MM ID/Name

- 118 Historic England

Section 8: Placemaking, Heritage, Design and Culture

MM8.10 Policy D6 Explanation

Objecting to modified text "*where up to 95% of the most important deposits remain preserved in situ or where it can be demonstrated that the proposals would bring substantial public benefits*" as ambiguous. HE advise text should instead reflect the national policy approach: avoid first or if not possible, to minimise harm and to refuse permission unless demonstrated necessary to achieve substantial public benefit that outweighs harm in line with national policy.

List of MM ID/Name

- 118 Historic England
- 983 Mary Urmston

6. What happens next?

- 6.1 The representations relating to the Proposed Main Modifications consultation have been submitted in full to the Inspectors undertaking the examination. They will be made available online under the provisions set out in the published Privacy Notice (appendix G).
- 6.2 The Inspectors will consider all the representations made on the proposed MMs before finalising the examination report and the schedule of recommended MMs. Further hearing sessions will not usually be held, unless the Inspectors consider them essential to deal with substantial issues raised in the representations, or to ensure fairness. If the plan is found 'sound', with any necessary modifications, it would be able to be adopted by the Council.

Appendices

- A. Consultation Letter/Email, Statement of Representations Procedure and Guidance Note
- B. Council's formal notice of consultation/Press notification
- C. York Press article
- D. Consultation poster
- E. Survey
- F. List respondents (inc MM ID ref)
- G. Privacy Notice
- H. Summary of representations in Plan order
- I. Non-duly made responses

Appendix A: Consultation Letter, Statement of Representations Procedure and Guidance Note



Place Directorate
Strategic Planning Policy
City of York Council
West Offices
Station Rise
York
YO1 6GA

13th February 2023

Dear Resident/Business,

CITY OF YORK LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION (February 2023)

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 – REGULATION 19, 20 and 35

In keeping with planning regulations, I am writing to let you know about an opportunity to comment on the 'Proposed Main Modifications' (2023) to the City of York Local Plan.

You are getting this letter because you, or someone in your business or household, previously expressed an interest in, or responded to, a Local Plan consultation.

The Local Plan is an important document which will provide a development framework for the whole city and form the basis for future planning decisions.

The City of York Local Plan (2017-2033) is currently in a process known as 'Examination' by independent Planning Inspectors following its submission to the Secretary of State for Housing, Communities and Local Government on 25 May 2018.

After the first set of examination hearings - which took place in December 2019 - we put forward a number of 'Proposed Modifications' to the Local Plan we originally submitted. Consultation on those proposed modifications took place in two phases, from 10 June - 22 July 2019 and 25 May - 7 July 2021.

Examination hearing sessions to discuss the submitted plan - including those proposed modifications - were then held between May and September 2022.

Following those latest hearings, the Inspectors have asked us to consult on a schedule of proposed 'Main Modifications', in response to issues raised by the Inspector before and during those sessions.

The attached 'Statement of Representations Procedure' and 'Guidance note' has further, detailed guidance on the scope of our consultation, and will help you to understand how to submit your representations to the Council as well as what you need to consider when preparing them. Any written representations made will be processed in accordance with our Privacy Notice and considered directly by the independent Planning Inspectors.

You can respond at any time during the 6-week consultation period from 13 February 2023 until 27 March 2023.

All consultation documents are available on our website <https://www.york.gov.uk/consultations>. Documents can also be seen electronically at the city's libraries and Explore Centres. Printed copies will be available at our Customer Service Centre in West Offices.

You can comment on the consultation via our online survey at www.york.gov.uk/consultations. Alternative format response forms are available from the Strategic Planning Policy Team at localplan@york.gov.uk or (01904) 552255.

We are also consulting on a Community Infrastructure Levy (CIL) draft Charging Schedule and evidence base, to help pay for infrastructure which can support developments such as schools, green infrastructure and sustainable transport. If you would like to take part in the CIL consultation, please visit www.york.gov.uk/consultations.

If you require further information or advice, or would like further information on the Local Plan, any associated documents or the Local Plan process, please contact the Strategic Planning Policy Team by emailing localplan@york.gov.uk or phoning (01904) 552255. You can also use these contact details to notify us if you no longer want to receive these planning updates.

We look forward to receiving your comments.

Yours faithfully,



Neil Ferris
Corporate Director of Place

**STATEMENT OF REPRESENTATION PROCEDURE AND AVAILABILITY OF DOCUMENTS
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012
– REGULATION 19, 20 and 35**

CITY OF YORK LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION (Feb 2023)

Title of Document

City of York Local Plan Main Modifications Consultation (February 2023)

Subject Matter and Area Covered

The City of York Publication Draft Local Plan (“Draft Plan”) was submitted for independent Examination on 25 May 2018. Examination hearings commenced on 10 December 2019 with Phase 4 hearings closing on 22 September 2022. Following the hearings, the Inspectors invited the Council to submit, for their consideration, a schedule of proposed Main Modifications to the Draft Plan which they considered to be necessary to make the plan sound. The schedule is now subject to public consultation.

The Local Plan sets out the broad spatial planning and policy framework for the whole City of York administrative area up to 2032/33 with the exception of the Green Belt boundaries which will endure for a minimum of 20 years. It includes a long-term vision and strategic objectives, policies to guide development, and allocations for new homes, jobs, and open space.

Period of Publication for Representations

Representations are invited on the City of York Local Plan Main Modifications Consultation for a period of 6 weeks, from 13 February until midnight on 27 March 2023. This statement provides details on how to make representations.

Statement of arrangements – How to view the documents

During the public consultation period, copies of the main documents associated with the City of York Local Plan Main Modifications consultation will be available to view:

- On the Council’s website at <https://www.york.gov.uk/consultations>
- At the Council’s West Offices, Station Rise, York (Mon-Fri 9:00-17:00, Sat and Sun closed)

Documents are also available to view electronically via the city’s libraries and Explore centres. Current opening times are available to view on the Explore York webpage <https://explore.york.org.uk/libraries/>

Members of the library can book computer sessions up to a week in advance and you can use the booking webpage (<https://pcbookings.explore.york.org.uk/>) to book a session. You will need your library card number and PIN to log in. Alternatively, you can book by speaking to library staff at any of the open branches. For more information on accessing or booking a computer at a library, and for up-to-date opening times, please see: <https://explore.york.org.uk/digital/computers-and-wifi-in-libraries/>

Documents which are available to view:

The following documents are available as part of this consultation:

- Schedule of Proposed Main Modifications
- Policy Map Modifications

- Sustainability Appraisal Addendum
- Sustainability Appraisal Technical Note (ST15a)
- Habitats Regulations Assessment Addendum
- Habitats Regulations Assessment Addendum (ST15a)

Evidence base documents available as part of this consultation:

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

The following documents are available for information only and do not form part of the Proposed Main Modification consultation:

- Schedule of additional modifications (minor corrections and factual updates)
- 'Tracked changes' version of the Submission Local Plan including proposed modifications.
- Equalities Impact Assessment

Representations

Representations can be made throughout the representation period but must be made before midnight on 27 March 2023. Please note that late representations

cannot be accepted. Representations can be made in writing or by electronic communication. You can comment on the consultation:

- via our online survey at <https://www.york.gov.uk/consultations>
- by requesting a response form. Contact the Strategic Planning Policy Team at email: localplan@york.gov.uk or telephone: (01904) 552255. The response form can be returned by:
 - email localplan@york.gov.uk with subject line 'Local Plan MM Consultation'
 - post to: FREEPOST RTEG-TYYU-KLTZ, Strategic Planning Policy, West Offices, Station Rise, York, YO1 6GA

All representations should include your name and postal address. All individual representations received will be provided to the Planning Inspectors and considered as part of the Local Plan examination. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans set out in the Framework (NPPF). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Please refer to the Guidance Note when preparing representations.

Request for Notification

Representations at this stage may be accompanied by a request to be notified about:

- the publication of the recommendations of the Inspectors appointed to carry out the independent examination; and
- the adoption of the local Plan.

For further details, please contact Strategic Planning Policy Team on (01904) 552255 or email localplan@york.gov.uk

How we will use your Personal Data

We will collect information

- When you complete forms either electronically or a paper copy
- By post, email and phone conversations as appropriate

We will use the information you give us to support progress towards adoption and examination of the Local Plan. As part of the Local Plan process, the Council needs to make information available for public inspection, which we do by publishing on our website and also making paper copies available on request. We will only make available or publish the information we have to do to meet our legal obligations. This includes:

- Your name, or the name of the Organisation you represent.
- Your ID number (if provided)
- Your comments/representations

We are also required by law to share information with the Planning Inspectorate.

This includes the above information alongside:

- Your contact address/telephone number
- Your email address (if provided)

We will ask for your consent to contact you about the Local Plan or if you have requested to be notified of the submission of the Local Plan for examination, the publication of the Inspectors' recommendations and the adoption of the Local Plan. You can withdraw your consent at any time by contacting localplan@york.gov.uk

Please read our Privacy Notice to find out more about how we protect your personal information.

GUIDANCE NOTE

CITY OF YORK LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION FEBRUARY 2023

Where do I send my comments?

You can comment on the consultation:

- via our online survey <https://www.york.gov.uk/consultations>
- by requesting a response form. Contact the Strategic Planning Team at localplan@york.gov.uk or (01904) 552255.

The response form can be returned:

- by email to localplan@york.gov.uk with the subject line 'Local Plan MM Consultation'
- by post to:
FREEPOST RTEG-TYYU-KLTZ
Strategic Planning Policy
West Offices
Station Rise
York
YO1 6GA

However you choose to respond, in order for the Inspectors to consider your comments you must provide your name and address with your response. We also need your confirmation that you consent to our Privacy Policy.

On what can I make comments?

Our new Local Plan is currently in the process of examination by independent Planning Inspectors following submission to the Secretary of State for Housing, Communities and Local Government in May 2018.

As part of the examination process, the council has requested that the Inspectors recommend any main modifications that they consider necessary to make the plan sound and legally compliant, to allow it to be adopted. Following hearing sessions, which took place between December 2019 and September 2022, the council has worked with the Inspectors to prepare a Schedule of Proposed Main Modifications to the plan. Further evidence base published since the previous modifications consultation (May 2021) is also being made available for comment.

You can make comments on any of the proposed Main Modifications and evidence base documents as set out below. The purpose of this consultation is for you to say whether you think the proposed modifications and/or evidence make the Local Plan 'Legally Compliant' and 'Sound'. These terms are explained as you go through this note. At this stage in the examination process, the consultation only relates to the proposed main modifications and any policies map changes (and not other aspects of the plan). The main modifications are put forward without prejudice to the Inspector's final conclusions. Therefore please note:

- Comments can **only** be made on documents which form part of the proposed

Main Modifications consultation (set out in the Statement of Representations Procedure and on the consultation webpage)

- This is not the opportunity to make comments on other aspects of the Plan.
- If you submitted comments during previous stages of Local Plan consultation, the Inspector has considered these during the examination and there is no need to make these again.

How do I know what has changed?

Modification schedules have been prepared which include the text as it appeared in the submitted Plan with proposed new text highlighted and underlined and deleted text highlighted and struckthrough.

Please note that the policy numbering reflects the policy numbering in the submitted Local Plan (May 2018). Where new policies are being proposed, these have been numbered sequentially with a suffix letter 'a'. It is the intention of the Council to renumber the policies (and any consequent cross-referencing) at the point of Adoption.

What are the Tests of Soundness and Legal Compliance?

The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans set out in the National Planning Policy Framework (NPPF) (see below). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Legal Compliance

To be legally compliant the plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Soundness

Soundness is explained in paragraph 182 of the NPPF. The Inspectors conducting the Examination in Public have to be satisfied that the Local Plan is 'sound'; namely that it is:

- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

Do I have to use the survey/response form?

Yes please. This is because further changes to the plan will be a matter for Planning Inspectors to consider and providing responses in a consistent format is important. For this reason, all responses should use the survey or consultation response form. Please

be as succinct as possible and complete one form for each modification or issue on which you wish to comment. You can attach additional evidence to support your case, but please ensure that it is clearly referenced.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representations should still be submitted on the consultation survey/response form with the information attached.

Do I need to attend a Public Examination?

Four phases of Public Hearings have already been held on the broad range of strategic and detailed policy matters addressed by the Local Plan, between December 2019 and September 2022. The need for, and scope of, further Hearings will be set by the key issues raised by responses received and other matters the Inspector considers to be relevant. Should the Inspectors decide to hold further sessions as a result of the modifications consultation, please indicate whether you consider there is a need to be present. You should note that Inspectors do not give any more weight to issues presented in person than written evidence.

Where can I view the Consultation documents?

Copies of the consultation documents are available to view:

- On the Council's website <https://www.york.gov.uk/consultations>
- At the Council's West Offices, Station Rise, York, YO1 6GA (Mon-Fri 9:00-17:00, Sat and Sun closed)

Documents are also available to view electronically via Libraries and Explore Centres. See our [Statement of Representations Procedure](#) (above) for further information.

How will my comments be used?

The comments received during Proposed Main Modifications consultation will be forwarded to the Inspectors who will then issue their Report and Recommendations. Comments made on the Additional Modifications will be considered by the council. Comments are not being invited on the unchanged content of the submitted City of York Local Plan (May 2018)

Next Steps

The Inspectors will consider all the representations made on the proposed MMs before finalising the examination report and the schedule of recommended MMs. Further hearing sessions will not usually be held, unless the Inspector considers them essential to deal with substantial issues raised in the representations, or to ensure fairness.

Appendix A: Consultation Email

Dear Resident/Business,

CITY OF YORK LOCAL PLAN
PROPOSED MAIN MODIFICATIONS CONSULTATION (February 2023)
THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND)
REGULATIONS 2012 – REGULATION 19, 20 and 35

<https://www.york.gov.uk/LocalPlanConsultation2023>

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Following those latest hearings, the Inspectors have asked us to consult on a schedule of proposed 'Main Modifications', in response to issues raised by the Inspectors before and during those sessions.

The attached '[Statement of Representations Procedure](#)' and '[Guidance note](#)' has further, detailed guidance on the scope of our consultation, and will help you to understand how to submit your representations to the Council as well as what you need to consider when preparing them. Any written representations made will be processed in accordance with our [Privacy Notice](#) and considered directly by the independent Planning Inspectors.

You can respond at any time during the 6-week consultation period from 13 February 2023 until 27 March 2023.

All consultation documents are available on our website <http://www.york.gov.uk/LocalPlanConsultation2023>. Documents can also be seen electronically at the city's libraries and Explore Centres. Printed copies will be available at our Customer Service Centre in West Offices.

You can comment on the consultation via our online survey at <http://www.york.gov.uk/LocalPlanConsultation2023>. Alternative format response forms are available from the Strategic Planning Policy Team at localplan@york.gov.uk or (01904) 552255.

We are also consulting on a Community Infrastructure Levy (CIL) draft Charging Schedule and evidence base, to help pay for infrastructure which can support developments such as schools, green infrastructure and sustainable transport. If you would like to take part in the CIL consultation, please visit www.york.gov.uk/consultations.

If you require further information or advice, or would like further information on the Local Plan, any associated documents or the Local Plan process, please contact the Strategic Planning Policy Team by emailing localplan@york.gov.uk or phoning (01904) 552255. You can also use these contact details to notify us if you no longer want to receive these planning updates.

We look forward to receiving your comments.

Yours faithfully,

Neil Ferris

Corporate Director of Place

City of York Council | Strategic Planning Policy

e: localplan@york.gov.uk

Directorate of Place|West Offices |Station Rise |York YO1 6GA

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STATEMENT OF REPRESENTATION PROCEDURE AND AVAILABILITY OF DOCUMENTS

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 – REGULATION 19, 20 and 35

CITY OF YORK LOCAL PLAN PROPOSED MAIN MODIFICATIONS CONSULTATION (Feb 2023)

Title of Document

City of York Local Plan Main Modifications Consultation (February 2023)

Subject Matter and Area Covered

The City of York Publication Draft Local Plan (“Draft Plan”) was submitted for independent Examination on 25 May 2018. Examination hearings commenced on 10 December 2019 with Phase 4 hearings closing on 22 September 2022. Following the hearings, the Inspectors invited the Council to submit, for their consideration, a schedule of proposed Main Modifications to the Draft Plan which they considered to be necessary to make the plan sound. The schedule is now subject to public consultation.

The Local Plan sets out the broad spatial planning and policy framework for the whole City of York administrative area up to 2032/33 with the exception of the Green Belt boundaries which will endure for a minimum of 20 years. It includes a long-term vision and strategic objectives, policies to guide development, and allocations for new homes, jobs, and open space.

Period of Publication for Representations

Representations are invited on the City of York Local Plan Main Modifications Consultation for a period of 6 weeks, from 13 February until midnight on 27 March 2023. This statement provides details on how to make representations.

Statement of arrangements – How to view the documents

During the public consultation period, copies of the main documents associated with the City of York Local Plan Main Modifications consultation will be available to view:

- On the Council’s website at <https://www.york.gov.uk/LocalPlanConsultation2023>
- At the Council’s West Offices, Station Rise, York (Mon-Fri 9:00-17:00, Sat and Sun closed)

Documents are also available to view electronically via the city’s libraries and Explore centres. Current opening times are available to view on the Explore York webpage <https://explore.york.gov.uk/libraries/>

Members of the library can book computer sessions up to a week in advance and you can use the booking webpage (<https://pcbookings.explore.york.gov.uk/>) to book a session. You will need your library card number and PIN to log in. Alternatively, you can book by speaking to library staff at any of the open branches. For more information on accessing or booking a computer at a library, and for up-to-date opening times, please see: <https://explore.york.gov.uk/digital/computers-and-wifi-in-libraries/>

Documents which are available to view:

The following documents are available as part of this consultation:

- Schedule of Proposed Main Modifications
- Policy Map Modifications
- Sustainability Appraisal Addendum
- Sustainability Appraisal Technical Note (ST15a)
- Habitats Regulations Assessment Addendum
- Habitats Regulations Assessment Addendum (ST15a)

Evidence base documents available as part of this consultation:

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

The following documents are available for information only and do not form part of the Proposed Main Modification consultation:

- Schedule of additional modifications (minor corrections and factual updates)
- 'Tracked changes' version of the Submission Local Plan including proposed modifications.
- Equalities Impact Assessment

Representations

Representations can be made throughout the representation period but must be made before midnight on 27 March 2023. Please note that late representations cannot be accepted. Representations can be made in writing or by electronic communication. You can comment on the consultation:

- via our online survey <https://www.york.gov.uk/LocalPlanConsultation2023>
- by requesting a response form. Contact the Strategic Planning Policy Team at email: localplan@york.gov.uk or telephone: (01904) 552255. The response form can be returned by:
 - email localplan@york.gov.uk with subject line 'Local Plan MM Consultation'
 - post to: FREEPOST RTEG-TYYU-KLTZ, Strategic Planning Policy, West Offices, Station Rise, York, YO1 6GA

All representations should include your name and postal address and/or email. All individual representations received will be provided to the Planning Inspectors and considered as part of the Local Plan examination. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans set out in the Framework (NPPF). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Please refer to the [Guidance Note](#) when preparing representations.

Request for Notification

Representations at this stage may be accompanied by a request to be notified about:

- the publication of the recommendations of the Inspectors appointed to carry out the independent examination; and
- the adoption of the local Plan.

For further details, please contact Strategic Planning Policy Team on (01904) 552255 or email localplan@york.gov.uk

How we will use your Personal Data

We will collect information

- When you complete forms either electronically or a paper copy
- By post, email and phone conversations as appropriate

We will use the information you give us to support progress towards adoption and examination of the Local Plan. As part of the Local Plan process, the Council needs

to make information available for public inspection, which we do by publishing on our website and also making paper copies available on request. We will only make available or publish the information we have to do to meet our legal obligations. This includes:

- Your name, or the name of the Organisation you represent.
- Your ID number (if provided)
- Your comments/representations

We are also required by law to share information with the Planning Inspectorate. This includes the above information alongside:

- Your contact address/telephone number
- Your email address (if provided)

We will ask for your consent to contact you about the Local Plan or if you have requested to be notified of the submission of the Local Plan for examination, the publication of the Inspectors' recommendations and the adoption of the Local Plan. You can withdraw your consent at any time by contacting localplan@york.gov.uk

Please read our [Privacy Notice](#) to find out more about how we protect your personal information.

Appendix B: Formal Notice of Consultation/Press Notice

Notice of Publication of the City of York Local Plan Proposed Main Modifications Consultation Consultation commences Monday 13 February and ends Monday 27 March 2023 (midnight)

Notice pursuant to the Planning and Compulsory Purchase Act 2004 (as amended), The Town and Country Planning (Local Planning) (England) Regulations

The Local Plan is the overarching planning document that identifies where development will take place, how new jobs will be supported and how the environment of the city will be protected and enhanced. It allocates specific sites and locations for new development which is required up to 2038 in order to meet local needs. Once formally adopted, the Local Plan will be used to assess planning applications and provide the framework for Neighbourhood Planning in the city.

The City of York Council submitted the draft Local Plan to the Secretary of State on 25th May 2018 under the Town and Country Planning (Local Planning) (England) Regulations 2012. Inspectors Simon Berkeley (BA MA MRTPI), Andrew McCormack (BSc (Hons) MRTPI) [Phase 1 in 2019] and Paul Griffiths (BSc (Hons) BArch IHBC) [Phases 2, 3 & 4 of the hearing sessions in 2022] were appointed to carry out an examination into the legal compliance and soundness of the Local Plan. Examination Hearing sessions were held by the appointed Inspectors during the period of December 2019 and May to September 2022.

Following the latest hearing sessions, the Inspectors have instructed the council to undertake consultation on a schedule of proposed Main Modifications, which respond to issues raised by the Inspectors before and during the hearing sessions.

The following documents are available as part of this consultation:

- Schedule of Proposed Main Modifications
- Policy Map Modifications
- Sustainability Appraisal Addendum
- Sustainability Appraisal Technical Note (ST15a)
- Habitats Regulations Assessment Addendum
- Habitats Regulations Assessment Addendum (ST15a)

Further evidence base published since the previous modifications consultation (May 2021) is also being made available for comment.

Consultation material can be viewed on the Council's website: <https://www.york.gov.uk/consultations>. Copies of the Local Plan Main Modifications consultation documents are available to view at City of York Council Customer Service Centre at West Offices, Station Rise (during normal opening hours). Information will also be placed in libraries and Explore Centres explaining how the Local Plan documents can be viewed online.

You can comment on the consultation:

- via our online survey <https://www.york.gov.uk/consultations>
- by requesting a response form. Contact the Strategic Planning Team at localplan@york.gov.uk or (01904) 552255.

The response form can be returned:

- by email to localplan@york.gov.uk with the subject line 'Local Plan MM Consultation'
- by post to:

FREEPOST RTEG-TYYU-KLTZ
Strategic Planning Policy
West Offices
Station Rise
York
YO1 6GA

All representations should include your name and contact details and specify the modification to which they relate and the grounds on which they are made. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Cooperate, and meets the national tests of 'soundness' for Local Plans set out in the National Planning Policy Framework (NPPF) (see below). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Legal Compliance

To be legally compliant the plan has to be prepared in accordance with the Duty to Cooperate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Soundness

Soundness is explained in paragraph 182 of the NPPF. The Inspectors conducting the Examination in Public have to be satisfied that the Local Plan is 'sound'; namely that it is:

- Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

Each representation on a modification should be on a separate form. Responses will be processed in accordance with our privacy policy and reviewed directly by the Inspectors.

Only those representations that refer to a specific change or supporting document, that are made in writing, and are received by the council within the six-week consultation period (ending at midnight on 27th March 2023) will be considered. If you require further information please contact the Strategic Planning Policy Team by emailing the team at localplan@york.gov.uk or telephoning (01904) 552255.

Appendix C: York Press Article

York residents can have their say on minor changes made to the city's planning blueprint for the next 15 years.

City of York Council is staging the modifications consultation from today (Feb 13) until March 27, before the final plan is submitted to government inspectors in the coming months.

The 6-week consultation will outline the minor modifications requested by the inspector - to allow it to be adopted and judged 'Legally Compliant' and 'Sound'.

If approved, it will be York's first adopted Local Plan in 60 years, with the city council finally having policies in place to guide it on its planning decisions.

The modifications consultation follows a series of hearing sessions, which took place between December 2019 and September 2022.

'Significant milestone' for York's bid to create Local Plan

Since then, the council has worked with the Inspectors to prepare a Schedule of Proposed Main Modifications to the plan.

The council is writing to everyone who has responded to previous consultations to inform the preparation of the Local Plan since 2013 in line with government regulations, allowing them to respond to changes.

At this stage in the examination process, the consultation only relates to the proposed main modifications and any policies map changes (and not other aspects of the plan).

Once adopted, York's Local Plan will:

- For the first time, create and protect a permanent green belt
- support the creation of 18,000 homes, including over 4,000 new affordable homes
- support new transport infrastructure investment
- create up to six new schools
- provide more opportunities for employment sites

- support the expansion of the University of York
- invest in brownfield sites
- provide the policies needed to reflect climate change ambition

Cllr Nigel Ayre, Executive Member for Finance and Performance with responsibility for the Local Plan, said: "After years of work, we have reached the last significant step before we can adopt a Local Plan for the first time in 60 years.

"This is a robust and sound plan, which will ensure York is able to deliver the housing, jobs, growth and facilities our city needs, whilst also protecting the city's unique character, green belt and natural beauty."

He added: "'I'd like to thank the inspectors for their work and feedback as well as all planning experts, officers and residents who have invested their time in developing and progressing the plan to this final stage. We will continue to work constructively with the inspectors and get this plan adopted for the benefit of our city's future."

Following the modifications consultation, the final plans will be submitted to inspectors for approval and ultimately adopted by the city.

For more information visit www.york.gov.uk/LocalPlan

Appendix D: Library/Explore Poster



City of York Local Plan Proposed Main Modifications Consultation

The **new Local Plan** will set strategic priorities and a development framework for the whole city, forming the basis for planning decisions.

Following hearing sessions, the Local Plan Inspectors have recommended a number of changes to the submitted Plan in order to make the Plan sound.

We are now consulting on these changes, known as Main Modifications, and comments are invited from the public and interested parties.

How to take part?

Copies of the main documents are available to view:

- on the Council's website at www.york.gov.uk/consultations
- at the **Council's West Offices**, Station Rise, York (Mon-Fri 9:00-17:00, Sat and Sun closed). **Contact the team to view on (01904) 552255.**

You can respond:

- via the online survey www.york.gov.uk/consultations
- by requesting a response form. Contact the Strategic Planning Policy Team at localplan@york.gov.uk or phone (01904) 552255.

All responses must be received by midnight on Monday 27 March 2023.

www.york.gov.uk/LocalPlanConsultation2023

The council is also consulting on a Community Infrastructure Levy (CIL) draft Charging Schedule and evidence base, to help pay for infrastructure to support development such as schools, green infrastructure and sustainable transport. For further information see: www.york.gov.uk/consultations.

Appendix E: Consultation Survey

1. Survey Information

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

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

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

You can withdraw your consent at any time by contacting localplan@york.gov.uk.

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

Yes No



2. Register for consultation

* 2. Your name:

* 3. Contact details:

Please provide email and/or address

Organisation (optional)

Address

Address 2

City/town

Post code

Email address

* 4. Do you wish to be notified when the City of York Local Plan is adopted by the Council?

If yes we will use contact details provided above

Yes

No

3. Your response

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

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

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

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

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

4. Proposed Main Modifications

* 6. To which section does this response relate?

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

5. Section 2: Vision

* 7. To which modification does this response relate?

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



6. Section 3: Spatial Strategy

* 8. To which modification does this response relate?

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

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

7. Section 4: Economy and Retail

* 9. To which modification does this response relate?

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

8. Section 5: Housing

* 10. To which modification does this response relate?

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

9. Section 6: Health and Wellbeing

*** 11. To which modification does this response relate?**

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

10. Section 7: Education

*** 12. To which modification does this response relate?**

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

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

* 13. To which modification does this response relate?

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

12. Section 9: Green Infrastructure

* 14. To which modification does this response relate?

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

13. Section 10: Managing Development in the Green Belt

* 15. To which modification does this response relate?

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

14. Section 11: Climate Change

* 16. To which modification does this response relate?

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

15. Section 12: Environmental Quality and Flood Risk

* 17. To which modification does this response relate?

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

16. Section 14: Transport and Communications

* 18. To which modification does this response relate?

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

17. Section 15: Delivery and Monitoring

* 19. To which modification does this response relate?

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

18. Proposed Policy Map Modifications

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

* 20. To which modification does this response relate?

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

- PMM30 - Impfal Barracks (Policies Map South) [link](#)
- PMM31 - Askham Bryan (Policies Map South) [link](#)
- PMM32 - Moor Lane, Woodthorpe (Policies Map South) [link](#)
- PMM33 - Little Hob Moor (Policies Map South) [link](#)
- PMM34 - Campleshon Road Open Space (Policies Map South) [link](#)
- PMM35 - Elvington Industrial Estate, Elvington (Policies Map South) [link](#)
- PMM36 - South of Askham Bar Park and Ride (Policies Map South) [link](#)
- PMM37 - University of York Campus East Western Boundary (Policies Map South) [link](#)
- PMM38 - Heslington (Policies Map South) [link](#)
- PMM39 - Heslington, Lane south of University of York Campus West (Policies Map South) [link](#)
- PMM40 - Heslington Road and the Retreat (Policies Map South) [link](#)
- PMM41 - Germany Beck and Fordlands Road (Policies Map South) [link](#)
- PMM42 - Rowntree Park (Policies Map South) [link](#)
- PMM43 - Scarcroft Allotments (Policies Map South) [link](#)
- PMM44 - York College (Policies Map South) [link](#)
- PMM45 - Lord Deramores School, Heslington (Policies Map South) [link](#)
- PMM46 - Elvington Airfield Industrial Estate (Policies Map South) [link](#)
- PMM47 - Vale of York Academy and Bootham Junior School (Policies Map North) [link](#)
- PMM48 - Haxby Road Primary Academy and Greenfields Community Garden (Policies Map North) [link](#)
- PMM49 - Robert Wilkinson Primary Academy, Strensall (Policies Map North) [link](#)
- PMM50 - St Peters School (Policies Map North) [link](#)
- PMM51 - Poppleton Ousebank Primary School (Policies Map North) [link](#)
- PMM52 - Haxby Proposed Train Station (Policies Map North) [link](#)
- PMM53 - Scarborough Bridge (Policies Map City Centre) [link](#)
- PMM54 - The Minster School (Policies Map City Centre) [link](#)
- PMM55 - Millfield Industrial Estate, Wheldrake (Policies Map South) [link](#)
- PMM56 - St. Leonard's Hospice, Dringhouses (Policies Map South) [link](#)
- PMM57 - New Walk Orchard Park (Policies Map South) [link](#)
- PMM58 - Nelson's Lane Nursing Home, Dringhouses (Policies Map South) [link](#)
- PMM59 - Acomb Primary School (Policies Map South) [link](#)
- PMM60 - Hob Stone Court, Hob Moor (Policies Map South) [link](#)
- PMM61 - Westfield School (Policies Map South) [link](#)
- PMM62 - Westfield Marsh Open Space (Policies Map South) [link](#)
- PMM63 - York High School (Policies Map South) [link](#)
- PMM64 - The Mount School (Policies Map South) [link](#)
- PMM65 - Conservation Areas [link](#)
- PMM66 - Areas of Archaeological Interest [link](#)
- PMM67 - Strensall Common Special Area of Conservation (400m buffer) [link](#)
- PMM68 - Strensall Common Special Area of Conservation (5500m buffer) [link](#)



19. New evidence documents

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

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

20. Comment Form

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

- Support Object

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

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

- Not positively prepared - i.e. strategy will not meet development needs
 Not justified - i.e. there is no evidence to justify the modification
 Not effective - i.e. it won't work
 Not consistent with national policy - i.e. doesn't comply with the law

24. Please set out the reasoning behind your support or objection:

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

Appendix F: List of Respondents

MM ID	Representor
52	Pauline Bramley
60	York Travellers Trust
75	Heslington Parish Council
102	Elvington Parish Council
103	York Civic Trust
118	Historic England
119	Environment Agency
145	Mr Ken Guest
182	KCS Development Limited
192	Selby District Council
199	Mr J Harrison (ST14)
208	British Sugar PLC
231	Fulford Parish Council
232	Stephen Lornie
250	MJ Harrison
253	Bellway Homes
255	Home Builders Federation
269	Janet Sealy Hopton
332	York Environment Forum
339	Barratt and David Wilson Homes
345	Defence Infrastructure Organisation
365	Rachael Maskell MP
375	Wheldrake Parish Council
378	Langwith Development Partnership
381	Yorkshire Wildlife Trust
383	Natural England (Yorkshire and Northern Lincolnshire Area)
404	York Bus Forum
420	Jane Moorhouse
585	Taylor Wimpey Homes ST7
590	WNY Chamber of Commerce
594	TW Fields (Osballdwick) Ltd ST7
604	L&Q Estates
609	York and District Trades Union Council
616	The Coal Authority
620	Galtres Garden Village
659	Chris Wedgwood

825	Osboldwick and Derwent Ward Osboldwick Parish Council Murton Parish Council
849	University of York
850	National Highways
869	Ray Calpin
883	St Peters School
886	York Labour Party
891	Redrow Homes ST8
901	York St John University
927	Rufforth with Knapton Parish Council
929	Poppleton Neighbourhood Plan Committee
952	North Yorkshire County Council
962	P. W. McKenna
963	SM Newby J Linfoot A Linfoot
964	Watkin Jones Group PLC
965	Danehurst Development Limited
966	Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd ST14
968	NHS York Health and Care Partnership
969	Caravan and Motorhome Club
970	Various
971	NHS Property Services (Limetrees)
972	O'Neill Associates
973	Fusion Students
974	Askham Bryan College
975	Helmsley Group
976	Foss Argo Developments Limited
977	NHS Property Services (Clifton Hospital)
978	Mr Peter Garbutt
979	Barratt and David Wilson Homes and Vistry Homes
980	McCarthy Stone
981	Landowners of ST7
982	York Travellers Trust
983	Mary Urmston
984	Mary Eagleton
985	Daniel Nicholson
987	York Human Rights City Network
989	Chris Binns
990	Homes England
991	IQ Student Accommodation

992	Simon Crack
993	Churchill Retirement Living Ltd.
994	Catherine Rose Hilton
995	Gary Green
996	Anne Longmore
997	Rosamond Hanney
998	Clifton Ward
999	Francis James Branney
1000	Victor Keith Stannard
1001	Richard Bramley
1002	Josephine Tomlinson
1003	Andy Pingle
1004	Michael Jones
1005	Daniel James
1006	David Rowbottom
1007	Sharon Tagger
1008	Edith Jones
1009	Kate Hignett
1010	Janet White
1011	Joan Turner Woodward
1012	Merrill Davis
1013	Peter Hanson
1014	Hugh Robert Griffiths
1015	Paul R Goulden
1016	J Meredith
1017	Danielle Morgan
1018	Penny Bainbridge
1019	H Graham
1020	Virginia Riggall
1021	Michael Cardwell
1022	Sallie Moxon
1023	Siobhan Gilfillan
1024	Ruth Graham
1025	Prof. David Schultz
1026	Karen Merrifield
1027	Paul Tomlinson
1028	Eleanor Hindley
1029	Kathleen Wood
1030	Bryan Wood
1031	Catherine Kingston
1032	Andrew Evans
1033	Ruth Buckley

1034	York Guild of Media Arts
1035	Gareth Child
1036	Cynthia Wood
1037	Joy Barker
1038	Oliver Price
1039	Julie Barker
1040	Stephen Barker
1041	Bella Price
1042	Colin Fletcher
1043	Nigel Mitchell
1044	Regina Johnson
1045	Sarah Hewison
1046	Shaun Walton
1047	Helen Lee
1048	Liz Stone
1049	(Duplicate) Galtres Garden Village, St Peter's School, York St John University, Askham Bryan College, Helmsley Group, Foss Argo Developments Limited

Appendix G: Privacy Notice

Privacy Notice for City of York Local Plan Proposed Modifications Consultation and representations from the public 2023

This privacy notice was completed in February 2023 and will be regularly reviewed. When we use your personal data, CYC complies with data protection legislation and is the registered 'Controller'. Our data protection notification is registered with the Information Commissioner's Office (ICO) – reference **Z5809563**.

Why is information being collected?

The Council is undertaking public consultation to support progress towards adoption of the Local Plan, and also the examination of the Local Plan, which will ensure the Council meets its statutory and national planning policy requirements.

What information will be collected?

We will collect information such as

- Your name and personal contact details
- Organisation name, address and email
- Your opinions, thoughts and feedback
- Details of your land ownership.

How do we collect information?

We will collect information

- When you complete forms either electronically or a paper copy
- By post, email and phone conversations as appropriate

If we use Survey Monkey, you can find out how they use your information, at http://www.surveymonkey.com/mp/legal/privacy-policy/?ut_source=footer

If you complete a paper survey, once you complete and return it to us, we will transfer the information you have given us onto the council's secure network.

What will we do with the information?

We will use the information you give us to support progress towards adoption and examination of the Local Plan.

As part of the Local Plan process, the Council needs to make information available for public inspection, which we do by publishing on our website and also making paper copies available on request. We will only make available or publish the

information we have to do to meet our legal obligations. This includes:

- Your name, or the name of the Organisation you represent.
- Your ID number (if provided)
- Your comments/representations

We are also required by law to share information with the Planning Inspectorate. This includes:

- Your name
- Organisation (where relevant)
- Your ID number (if provided)
- Your contact address/telephone number
- Your email address (if provided)
- Your comments

You can find information on how the Planning Inspectorate uses your personal data, in their privacy notice:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices/customer-privacy-notice>

We will ask for your consent to contact you about the Local Plan or if you have requested to be notified of the submission of the Local Plan for examination, the publication of the Inspectors' recommendations and the adoption of the Local Plan. You can withdraw your consent at any time by contacting localplan@york.gov.uk.

We will not use the information for any other purpose than set out in this privacy notice and will not disclose to a third party i.e. other companies or individuals, unless we are required to do so by law for the prevention of crime and detection of fraud, or, in some circumstances, when we feel that you or others are at risk.

Third parties

The Council does not pass or sell personal data to third parties for marketing, sales or any other commercial purposes

What is our legal basis for collecting/sharing your personal information?

Any personal data including special category data that we process as part of this process is done in accordance with Article 6, 9 and 10 of the UK GDPR and Schedule 1 of the Data Protection Act 2018 (DPA 2018).

The legal basis for processing your personal data is in accordance with the following:

- Article 6(1)(a) – your consent
- Article 6(1)(c) UK GDPR – Legal Obligation

- Article 6(1)(e) UK GDPR - where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

This is supported by the following legal framework:

- Town and Country Planning (Local Planning (England) Regulations 2012. (Regulations 23,24,25 relating to Examination period)

The legal basis for processing your special category data is in accordance with the following:

- Article 9(2)(b) of the UK GDPR - Employment, social security and social protection
- Article 9(2)(g) of the UK GDPR –substantial public interest on the basis of Union or Member State law which is proportionate to the aim pursued and which contains appropriate safeguards

This is supported by Sch.1, Part 2 (6) of the Data Protection Act 2018 and the following:

- as above

Some of the Schedule 1 conditions for processing special category require an Appropriate Policy Document to be in place that sets out and explains the procedures for securing compliance with the principles in Article 5 and policies regarding the retention and erasure of such personal data. This document explains this processing and satisfies the requirements of Schedule 1, Part 4 of the DPA 2018 and supplements this privacy notice. You can find this at [Our Appropriate Policy Document – City of York Council](#)

Storage of information

We will keep the information you give us in CYC's secure network drive and make sure it can only be accessed by authorised staff.

Transferring personal data abroad

We may process your personal data using services hosted outside the UK or European Economic Area, but only where there are safeguards in place eg a data processing agreement etc that complies with obligations equivalent to the principles of UK data protection legislation

How long will we keep the information?

We will only keep your personal information for as long as is necessary and when we no longer have a need to keep it, we will delete or destroy it securely.

Where required or appropriate, at the end of the retention period we will pass onto the City Archives any relevant information.

Further processing

If we wish to use your personal information for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining the purpose prior to commencing the processing and the processing conditions. Where and whenever necessary, we will seek your consent prior to the new processing.

Your rights

To find out about your rights under data protection law, you can go to the Information Commissioners Office (ICO): <https://ico.org.uk/for-the-public/>

You can also find information about your rights at <https://www.york.gov.uk/privacy>

If you have any questions about this privacy notice, want to exercise your rights, or if you have a complaint about how your information has been used, please contact us at information.governance@york.gov.uk or on 01904 554145 or write to: Data Protection Officer, City of York Council, West Offices, Station Rise, York YO1 6GA.

**Appendix H: Summary of representations in Plan (modification)
order**

Section 2 – Section 15

Proposed Map Modifications

Evidence Base

Other

Section 2: Vision

MM 2.1 paragraph 2.5			
10 representations – 1 sound / 9 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
182	Johnson Mowat obo KCS	not sound	To reduce the annual housing requirement from 867 dwellings to 822 dwellings is short-sighted and fails to reflect the growing need for affordable housing in York
365	Rachael Maskell MP	not sound	I oppose the reduced housing number as it is grossly inadequate for reasons detailed in previous submissions by myself and York Labour Party.
378	Quod obo Langwith Development Partnership Ltd	sound	
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	To reduce the annual housing requirement from 867 dwellings to 822 dwellings is short-sighted and fails to reflect the growing need for affordable housing in York
604	Carter Jonas obo L&Q Estates	not sound	Object to the housing requirement and continue to support a higher figure as evidenced in our previous representations.
609	York & District Trades Union Council	not sound	York & District trades Union Council shares the concerns and wishes to give its support to the comments submitted by York Labour Party in its submission to this consultation..
886	York Labour Party	not sound	We continue to oppose the reduced housing number. Further evidence since our previous submissions demonstrates the continuing above average escalation in York's house prices, bucking the national now declining trend, worsening affordability, and the more detailed 2021 census data confirming in stark detail the major displacement of the working age family demographic. We recommend the earliest possible revision of the adopted plan to rectify its shortcomings.
891	Johnson Mowat obo Redrow Homes ST8	not sound	To reduce the annual housing requirement from 867 dwellings to 822 dwellings is short-sighted and fails to reflect the growing need for affordable housing in York
970	Kathryn Jukes obo various	not sound	Object to 822 dpa target; will be out of date on adoption.
1046	Shaun Walton	not sound	822 is still far too large a figure for new dwellings. York cannot supply this many!

MM 2.2 Policy DP2: Sustainable Development			
1 representation – 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
119	Environment Agency	Sound	Changes reflect earlier discussions between the EA and CoYC, as detailed in the Statement of Common Ground.

MM 2.3 Policy DP2: Sustainable Development			
4 representations – 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Suggests additional text to highlight issues of climate change and sustainable communities.</p> <p>Alternative proposed: Further modification proposed (additional text) “Mitigate and adapt to climate change through designing new communities and buildings, transport networks and services that support each community to be energy and resource efficient and reduce carbon emissions. This can be achieved by their being of mixed use and high density; designed around high-quality walking and cycling routes; providing a core set of community facilities safely and conveniently accessible on foot or by bicycle; ensuring the provision of high quality public transport routes to key destinations; and by managing servicing traffic and to accommodate appropriate emerging technologies.”</p>
332	York Environment Forum	not sound	<p>Policy should be enhanced. We would also suggest the supporting text is strengthened to match this new section, including a commitment to produce a Supplementary Planning Guidance Document on Developing Sustainable Communities.</p> <p>Alternative proposed: ‘Mitigate and adapt to climate change through designing new communities and buildings, transport networks and services that support each community to be energy and resource efficient and reduce carbon emissions. This can be achieved by their being of mixed use and high density; designed around high-quality</p>

			walking and cycling routes; providing a core set of community facilities safely and conveniently accessible on foot or by bicycle; ensuring the provision of high quality public transport routes to key destinations; and by managing servicing traffic and to accommodate appropriate emerging technologies.'
365	Rachael Maskell MP	not sound	I support the York Labour Party recommendations in relation to policy DP2.
886	York Labour Party	not sound	<p>Policy should be enhanced. We would also suggest the supporting text is strengthened to match this new section, including a commitment to produce a Supplementary Planning Guidance Document on Developing Sustainable Communities.</p> <p>Alternative proposed: 'Mitigate and adapt to climate change through designing new communities and buildings, transport networks and services that support each community to be energy and resource efficient, including embodied carbon, and reduce carbon emissions. This can be achieved by their being of mixed use and high density; designed around high-quality walking and cycling routes; providing a core set of community facilities safely and conveniently accessible on foot or by bicycle; ensuring the provision of high quality public transport routes to key destinations; and by managing servicing traffic and to accommodate appropriate emerging technologies.'</p>

MM2.4 Policy DP2 explanation – paragraphs 2.19a and 2.19b			
4 representations – 1 sound / 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
119	Environment Agency	sound	Changes reflect earlier discussions between the EA and CoYC, as detailed in the Statement of Common Ground
332	York Environment Forum	not sound	Test should be enhanced with a commitment to producing a SPD on Sustainable Communities.
365	Rachael Maskell MP	not sound	I support the York Labour Party comment on DP2 regarding consequential amendments to the supporting text.
886	York Labour Party	not sound	Text should be enhanced in line with comments in MM2.3

MM 2.5 Policy DP4: Approach to Development Management

No representations received

Section 3: Spatial Strategy**MM3.1 Policy SS1: Delivering Sustainable Growth for York**

14 representations – 13 not sound / 1 n/a

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
118	Historic England	not sound	In order to achieve sustainable growth in terms of York's environmental assets, it is important that not only the locations of growth safeguard these assets, but also the scale of growth proposed in each area. Alternative proposed: Policy SS1, second Paragraph amend the first sentence to read: "The location and scale of development through the plan"
182	Johnson Mowat obo KCS	not sound	In amending and updating the text on the Plan Period 2017/2033 with only limited land allocations from 2033 to 2038 the Plan fails to recognise the need for a Review well before 2033. Alternative proposed: MM3.1 be additionally modified to make reference to a Plan Review commencing no later than 2025.
231	Fulford Parish Council	not sound	This housing requirement is not justified by any demographic projection and is over double that which would be required by the latest household projection. The evidence by Oxford Economics does not justify the approach
232	Stephen Lornie		Targeting only 45% of affordable housing need is an admission that the plan fails to meet said identified need?
253	Lichfields obo Bellway Homes	not sound	The plan neither allocates sufficient land for the plan period or for a period beyond the plan period. The evidence does not support the 45% target of affordable housing. Other policies within the plan are insufficiently flexible to achieve anywhere near this figure.

255	HBF	not sound	<p>The housing requirement is not underpinned by robust evidence and is not justified. Concerned with the use of the word 'prioritise' in relation to brownfield land, and recommends further amendment.</p> <p>Alternative proposed: To state that the Council will seek to make efficient and effective use of brownfield sites where they are available for redevelopment, or something similar.</p>
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	<p>In amending and updating the text on the Plan Period 2017/2033 with only limited land allocations from 2033 to 2038 the Plan fails to recognise the need for a Review well before 2033.</p> <p>Concern over use of the word 'prioritise' Previously Developed Land (PDL). This Plan contains a balance of brownfield and greenfield sites with all other land largely in the Green Belt. Emphasis on prioritise unnecessary</p> <p>Alternative proposed: MM3.1 be additionally modified to make reference to a Plan Review commencing no later than 2025.</p>
590	WNY Chamber of Commerce	not sound	<p>Housing requirement is understated and there is a lack of allocation of employment land. Note current undersupply of housing against requirement. Queries stated completions on housing sites 2023/24.</p>
604	Carter Jonas obo L&Q Estates	not sound	<p>Policy SS1 with regard to the housing requirement is not sound for the reasons set out our previous representations.</p>
620	O'Neills obo Galtres Garden Village	not sound	<p>Housing trajectory is overly optimistic. Plan does not meet development needs of the city. The plan does not provide sufficient land to ensure GB permanence - safeguarded land is required. Greater provision for family housing, AH and older persons housing required.</p> <p>Alternative proposed: Add in - 'In addition safeguarded land is identified to ensure that any deficiency in housing supply arising at review of the Plan can be rectified'. Replace net provision of 822 dwellings with 1026. Delete - 'Deliver at least 45% of the 9,396 affordable dwellings that are needed to meet the needs of residents unable to compete on the open market.'</p>
659	Chris Wedgewood	not sound	<p>LP should allocate safeguarded land to ensure permanence of GB boundaries.</p>
886	York Labour Party	not sound	<p>We continue to oppose the reduced housing number. Further evidence since our previous submissions demonstrates the continuing above average escalation in York's house prices, bucking the national now declining trend, worsening affordability, and the more detailed</p>

			2021 census data confirming in stark detail the major displacement of the working age family demographic. We recommend the earliest possible revision of the adopted plan to rectify its shortcomings.
891	Johnson Mowat obo Redrow Homes ST8	not sound	In amending and updating the text on the Plan Period 2017/2033 with only limited land allocations from 2033 to 2038 the Plan fails to recognise the need for a Review well before 2033. Concern over use of the word 'prioritise' Previously Developed Land (PDL). This Plan contains a balance of brownfield and greenfield sites with all other land largely in the Green Belt. Emphasis on prioritise unnecessary
970	Kathryn Jukes obo various	not sound	GB boundaries should endure for more than 5 yrs after plan period - not NPPF compliant. As housing target out of date, plan will need reviewing and GB boundaries reviewed to accommodation development. New bullet point 'Making the best use of previously developed land' should be amended to accord with wording in MM3.2 which refers to 'suitable pdl'. Alternative proposed: Amend bullet point 'Making the best use of pdl' to include 'suitable' before pdl.

MM3.2 Policy SS1 explanation – new paragraphs			
6 representations – 2 sound / 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
118	Historic England	sound	Support addition text which helps clarity and explain the spatial strategy.
118	Historic England	not sound	The proposed modifications do not address Historic England's concern regarding Figure 3.1 which fails to adequately depict the contribution made by the wider rural landscape to York historic character and setting. A modification is required which makes it clear that the 'Areas Retaining Rural Setting' identified in Figure 3.1 do not include those areas outside of the ring road that perform this function. Alternative proposed: Paragraph 3.67, add the following sentence to the end of the paragraph: 'The design and layout of the road should minimise the impact upon the

			openness of the Green Belt and demonstrate how it would safeguard those elements which contribute to the special character and setting of the historic City.'
231	Fulford Parish Council	not sound	Para 3.1c should be incorporated into policy and its exclusion has resulted in the strategy not being properly evaluated in the Sustainability Appraisal
339	Stantec obo BDWH ST7, ST9, ST14, ST31	sound	Modification supported
590	WNY Chamber of Commerce	not sound	Housing requirement is understated and there is a lack of allocation of employment land. Note current undersupply of housing against requirement. Queries stated completions on housing sites 2023/24.
970	Kathryn Jukes obo various	not sound	Revise bullet point in MM3.1 to include 'suitable' or remove from text in MM3.2

MM3.3 Key Diagram			
4 representations – 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO ST35	not sound	Modified diagram not justified as object to removal of ST35. Alternative proposed: The Green Belt boundary and built up area is made more clear around Queen Elizabeth Barracks, Strensall. Error corrected in that ST35 is shown on key but the site has been removed.
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	Object to the continued use of Green Belt strips to the west of ST7 – this land does not fit well the 5 main purposes of Green Belt
590	WNY Chamber of Commerce	not sound	Housing requirement is understated and there is a lack of allocation of employment land. Note current undersupply of housing against requirement. Queries stated completions on housing sites 2023/24.
891	Johnson Mowat obo Redrow Homes ST8	not sound	Object to the continued use of Green Belt strips to the west of ST8 – this land does not fit well the 5 main purposes of Green Belt

MM3.4 Table 1a and 1b (housing supply and distribution)			
2 representations – 2 not sound			

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
590	WNY Chamber of Commerce	not sound	Housing requirement is understated and there is a lack of allocation of employment land. Note current undersupply of housing against requirement. Queries stated completions on housing sites 2023/24.
604	Carter Jonas obo L&Q Estates	not sound	Additional land should be released to support housing needs. The lack of flexibility in the Plan will result in the need for Green Belt boundaries to be altered, contrary to NPPF para 85. There is an over-reliance on strategic sites.

MM3.5 Policy SS1 Explanation – paragraph 3.3			
4 representations – 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	Revised text provides no information on what measures the Council will take if affordable housing targets are not met. Alternative proposed: This text should be expanded to include reference of a Plan Review at 5 years.
604	Carter Jonas obo L&Q Estates	not sound	Additional land should be released to support housing needs. The lack of flexibility in the Plan will result in the need for Green Belt boundaries to be altered, contrary to NPPF para 85. There is an over-reliance on strategic sites.
620	O'Neills obo Galtres Garden Village	not sound	Housing trajectory is overly optimistic. Plan does not meet development needs of the city. The plan does not provide sufficient land to ensure GB permanence - safeguarded land is required. Greater provision for family housing, AH and older persons housing required. Alternative proposed: Revised wording - 'Policies H7 and H10 set out the Plan's policy approach to this, and at least 2,360 affordable homes could be delivered within the plan period through the operation of these policies. Combined with recorded completions (to 1st April 2022), other sources of forecast supply on windfall sites and known provision secured through the Council's Housing Delivery Programme, it is estimated that around

			3,046 affordable homes could be delivered in the plan period.' Delete paragraph starting 'To help increase....'
891	Johnson Mowat obo Redrow Homes ST8	not sound	Revised text provides no information on what measures the Council will take if affordable housing targets are not met.

MM3.6 Policy SS2: The Role of York's Green Belt			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO	sound	Support policy but suggest amendment to proposed modification for clarity Alternative proposed: Re-wording this modification to “The York Green Belt and its boundaries are shown on the policies map” for clarity
659	Chris Wedgewood	not sound	Comments relate to assessment of GB boundaries not proposed mod.

MM3.7 Policy SS3: York City Centre			
10 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	Needs to include drinking establishments now sui generis. Alternative proposed: Include sui generis drinking establishments.
972	O'Neills	not sound	Class E does not include drinking establishments or HFTA which have now been removed as city centre uses as policy only references Class E. Unjustified amendment which impacts vitality of city centre and objective of LP. Inconsistent with NPPF and UCO. Alternative proposed: Revise wording to refer to Class E and appropriate sui generis uses.

MM3.8 Policy SS4: York Central			
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2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
990	Avison Young obo Homes England	sound	Modification supported as the amended wording continues to provide a sufficiently comprehensive guide to the development of York Central.
1018	Penny Bainbridge	not sound	Questioning deliverability on York Central: - site cannot accommodate planned number of homes and necessary services - requires additional public spend for schools, health services and hospital space. - capital investment is not yet secured

MM3.9 Policy SS4: York Central			
1 representation – 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
990	Avison Young obo Homes England	sound	Modification supported as the amended wording continues to provide a sufficiently comprehensive guide to the development of York Central.

MM3.10 Policy SS4: York Central			
5 representations – 1 sound / 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Questions the ability of the site to deliver the range of facilities and services to make this a genuine sustainable community within the plan period. Scale of development does not meet the requirements of NPPF 2012 Paras 7, 17 & 70, even more so of the now current NPPF 2021 para 73 b) and therefore MM3.10 is unsound. Alternative proposed: Strongly recommend the production of SPD on Developing Sustainable Communities.

332	York Environment Forum	not sound	The very high upfront investment costs bring into question the ability of the site to deliver the range of local facilities and services to make this a genuine sustainable community during the plan period. Inconsistent with NPPF 2012 Paras 7, 17 & 70,
365	Rachael Maskell MP	not sound	I support the York Labour Party points on this matter.I further note the continued lack of on-site community facilities and public services in this policy. A lack of provision of these services on site undermines the quality of the development and will undermine the development of a sustainable community at York Central
886	York Labour Party	not sound	The very high upfront investment costs bring into question the ability of the site to deliver the range of local facilities and services to make this a genuine sustainable community during the plan period. Inconsistent with NPPF 2012 Paras 7, 17 & 70,
990	Avison Young obo Homes England	sound	Modification supported as the amended wording continues to provide a sufficiently comprehensive guide to the development of York Central.

MM3.11 Policy SS5: Castle Gateway

No representations received

MM3.12 Policy SS5: Castle Gateway

2 representations – 2 not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Accepts the reasoning for the transferral of the list of deliverables to the explanation. Additional text proposed.</p> <p>Alternative proposed: Principle xi (sub-area Castle and the Eye of York) to insert wording to read 'Create a public realm scheme for the Castle and Eye of York, which celebrates the significance of historic assets and the setting of the historic Castle and prison by removing the Castle Car Park.'</p>

332	York Environment Forum	not sound	<p>Accept the reasoning for the transferral of the list of deliverables from the opening policy wording to the explanation section, but does cause some disparities within the principles of the sub-areas.</p> <p>Alternative proposed: Principle xi (sub-area Castle and the Eye of York) - insert wording to read 'Create a public realm scheme for the Castle and Eye of York, which celebrates the significance of historic assets and the setting of the historic Castle and prison by removing the Castle Car Park.'</p>
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MM3.13 and MM3.14 Policy SS5: Castle Gateway
No representations received

MM3.15 Policy SS6: British Sugar/Manor School			
1 representation – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
208	Rapleys obo British Sugar PLC	not sound	The impact of approved development at the British Sugar site on the SINC has been tested thoroughly as part of the approved planning permissions, and as such the approved masterplan layout for the British Sugar site includes for suitable separation distances between the SINC and new development

MM3.16 Policy SS7: Civil Service Sports Ground
No representations received

MM3.17 Policy SS8: Land Adjacent to Hull Road

3 representations – 2 not sound / 1 n/a

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
52	Pauline Bramley		<p>The cumulative impact on Heslington of traffic and cycle routes into and around ST4, ST15 and ST27 has not been adequately considered. There would be opportunities with the proposed reconfiguration south of Grimston Bar for ST15, to link ST4 and ST27 directly into the road network to A64 there as well, while providing shorter, safer cycle/walking routes from the site into York.</p> <p>Alternative proposed: Proposed reconfiguration south of Grimston Bar for ST15, to link ST4 and ST27 directly into the road network to A64 there as well, while providing shorter, safer cycle/walking routes from the site into York.</p>
52	Pauline Bramley	not sound	<p>The cumulative impact on Heslington of traffic and cycle routes into and around ST4, ST15 and ST27 has not been adequately considered. . Greatly increased traffic through an already heavily congested area at peak times through Heslington down Field Lane into Main Street West and University Road as well as into Main Street South to access the facilities. Add in proposed cycle routes through the village the effect will be totally unacceptable</p>
75	Heslington Parish Council	not sound	<p>p.21 (ii) Traffic access to ST4 needs to be reconsidered in the light of already increasing congestion on Field Lane and associated highway connections. The cumulative impact on Heslington of traffic and cycle routes into and around ST4, ST15 and ST27 has not been adequately considered. There would be opportunities with the proposed reconfiguration south of Grimston Bar for ST15, to link ST4 and ST27 directly into the road network to A64 there as well, while providing shorter, safer cycle/walking routes from the site into York. Please see supporting documentation.</p> <p>Alternative proposed: Opportunities with the proposed reconfiguration south of Grimston Bar for ST15, to link ST4 and ST27 directly into the road network to A64 , while providing shorter, safer cycle/walking routes from the site into York.</p>

MM3.18 Policy SS9: Land East of Metcalfe Lane

2 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST32	not sound	Support removal of housing mix provision but object to the need for boundary treatment and this is shown on the masterplans, however the modifications process is to make the plan sound not better, this requirement was not discussed at the examination and is not considered necessary to make the plan sound as other policies on landscaping deal with this.
594	Paul Butler obo TW Fields (ST7)	not sound	<p>Previous masterplan work sought to include a mix of dwellings that reflects a 'garden village' which would deliver a proportion of family housing which is above that outlined in the Council's SHMA. Therefore wish to retain and amend original criterion.</p> <p>The proposed modification in respect of including defensible boundaries for the site is supported.</p> <p>Alternative proposed: ii. Deliver a sustainable housing mix, including the potential to deliver a higher proportion of larger family homes (approx. 35-40%), than that identified in the Council's most up to date Strategic Housing Market Assessment.</p>

MM3.19 Policy SS9: Land East of Metcalfe Lane			
3 representations – 2 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST33	sound	
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	<p>Modified text [re education] assumes no spare capacity in the Locality.</p> <p>Alternative proposed:"which meets the needs generated by the development and having regard to local capacity."</p>
594	Paul Butler obo TW Fields (ST7)	sound	The proposed modification is agreed. It reflects the latest position in respect of the education requirements for the site.

MM3.20 Policy SS9: Land East of Metcalfe Lane			
2 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	<p>The inclusion of references to a number of housing allocations within the proposed policy modification [re highway impacts] lacks clarity and is not consistent with the Council's evidence base for the site, and may lead to Site ST7 being required to deliver mitigation measures beyond its site-specific impact on the local highway network.</p> <p>Alternative proposed: v....The impacts of the site individually and cumulatively with sites ST8, ST9, ST14 and ST15 should be addressed.</p>
594	Paul Butler obo TW Fields (ST7)	not sound	<p>The references to a number of housing allocations within the proposed policy modification lacks clarity and is not consistent with the Council's evidence base for the site, and may lead to Site Ref. ST7 being required to deliver mitigation measures beyond its site-specific impact on the local highway network.</p> <p>Alternative proposed: v. The transport and highways impacts of the development should be assessed, to ensure sustainable transport provision at the site is achievable.</p>

MM3.21 Policy SS9: Land East of Metcalfe Lane			
4 representations – 2 sound / 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST34	not sound	<p>maintain an objection to the modifications as they do not allow vehicular access through the site.</p> <p>Alternative proposed: The modification proposed in the Statement of Common Ground is therefore supported as follows.</p>

			<p>vi. Provide vehicular access from Stockton Lane to the north of the site and/or Murton Way to the south of the site (as shown indicatively on the proposals policies map), with a small proportion of public transport traffic potentially served off Bad Bargain Lane. Access between Stockton Lane and Murton Way will be limited to public transport and walking/ cycling links only be designed to enable vehicular permeability whilst limiting the potential for rat-running through traffic travelling between each of the site's vehicular access points.</p>
378	Quod obo Langwith Development Partnership Ltd	sound	<p>Wording regarding the assessment of cumulative transport impacts with other strategic sites should be the same for all strategic policies.</p> <p>Alternative proposed: Policy wording for criterion (v) should be consistent with policies for ST8, ST9, ST14 and ST15 as suggested in MM3.54 for SS13.</p>
585	Johnson Mowat obo Taylor Wimpey ST7	sound	<p>It remains key to the delivery of the allocation that the dashed routes shown on the proposal maps across the Green Belt are treated as entirely being indicative and that the only weight to be attached to them should be solely in relation to the proposed vehicular access connections with the Stockton Lane, Bad Bargain Lane and Murton Way. The final design of these routes, layout and route of the roads will need to be informed by the detailed technical and master planning work as part of the preparation of the planning application</p>
594	Paul Butler obo TW Fields (ST7)	not sound	<p>Reference to indicative access locations supported. Maintain the view outlined within the SoCG that the criterion should be reworded to enable appropriate levels of vehicle permeability. The criterion references public transport penetration through the whole site being provided 'if necessary and feasible', whereas proposed modification MM.22 references public transport services being provided 'through the whole site'. Alternative wording would make the two criteria consistent.</p> <p>Alternative proposed: vi. Provide vehicular access from Stockton Lane to the north of the site and/or Murton Way to the south of the site (as shown indicatively on the proposals policies map), with a small proportion of public transport traffic potentially served off Bad Bargain Lane. Access between Stockton Lane and Murton Way will be limited to public transport and walking/ cycling links only be designed to enable vehicular</p>

			permeability whilst limiting the potential for rat-running through traffic travelling between each of the site's vehicular access points.
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MM3.22 Policy SS9: Land East of Metcalfe Lane			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	<p>Taylor Wimpey have no objection to the suggestion that ST7 has no through road. That said, wording in the first part of MM3.22 is inconsistent in that it seeks a public transport road through the allocation.</p> <p>Alternative proposed: If it is the Council's intention to keep the the two halves of ST7 separate save for walking and cycling links, the wording of MM3.22 should read as follows:-</p> <p>“vii. Deliver high quality, frequent and accessible public transport through the whole site to all parts of the site, to provide attractive links to....”</p>
594	Paul Butler obo TW Fields (ST7)	sound	Supported subject to the amendment to criteria vi as proposed by the developer as this would ensure consistency in respect of public transport penetration through the whole site.

MM3.23 Policy SS9: Land East of Metcalfe Lane			
3 representations – 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST35	not sound	Modification requires an increased level of open space than other allocations with no justification. As drafted, the scheme is required to provide new open space as per the policies map and open space requirements in accordance with GI2a and GI6. By having these as separate requirements implies that they are to be added together and the open space under allocation OS7 cannot contribute to the policy GI2a and GI6 requirements.

			This is unreasonable and unjustified, the policy should therefore reflect an overall provision in line with the on-site requirements not two separate levels of provision.
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	<p>There is confusion and overlap between the bullet points in ix. on the topic openspace and provision and the delivery of OS7. The requirements of OS7 and separate bullet points requiring compliance with GI2aand GI6 should be combined to avoid duplication.</p> <p>Alternative proposed: Provide a detailed site wide recreation and open space strategy and demonstrate its application in site masterplanning. This must include:</p> <ul style="list-style-type: none"> • Create Creation of new open space (as shown on the proposals policies map as allocation OS7) to protect the setting of the Millennium Way that runs through the site. Millennium Way is a historic footpath which follows Bad Bargain Lane and is a footpath linking York’s strays and should be kept open. A 50m green buffer has been included along the route of the Millennium Way that runs through the site to provide protection to this Public Right of Way and a suitable setting for the new development and achieving the site’s open space requirements in association with policies GI2a and GI6. The final details and width of the green buffer shall be determined through a future planning application. • Open space provision that satisfies policies GI2a and GI6 and which allocation OS7 as indicated on the policies map would assist in achieving.
594	Paul Butler obo TW Fields (ST7)	not sound	<p>TW Fields wish to maintain their position as outlined in the SoCG. The principle of the modification is agreed, however, the specific requirement for the buffer to be 50m is not. As currently worded it could be read that the provision of open space to comply with the two bulletpoints are standalone or in addition to one another. However, in reality the provision of open space under requirement OS7 would satisfy policy GI2a.</p> <p>Alternative proposed: Provide a detailed site wide recreation and open space strategy and demonstrate its application in site masterplanning. This must include:</p> <ul style="list-style-type: none"> • Create Creation of new open space (as shown on the proposals policies map as allocation OS7) to protect the setting of the Millennium Way that runs through the site. Millennium Way is a historic footpath which follows Bad Bargain Lane and is a

		<p>footpath linking York's strays and should be kept open. A 50m green buffer has been included along the route of the Millennium Way that runs through the site to provide protection to this Public Right of Way and a suitable setting for the new development and achieving the site's open space requirements in association with policies GI2a and GI6. The final details and width of the green buffer shall be determined through a future planning application.</p> <ul style="list-style-type: none"> • Open space provision that satisfies policies GI2a and GI6 and which allocation OS7 as indicated on the policies map would assist in achieving.
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MM3.24 Policy SS9: Land East of Metcalfe Lane			
2 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	not sound	Our Client objects to the inclusion of the word candidate. Whilst this is accurate, the policy seeks to give enhanced protection to an area that has not been proven to be a SINC. Other policies cover SINCs and if the candidate site is accepted it will have appropriate protection through those policies. If it is not accepted this policy provides a restrictive level of protection that is not necessary. The requirement should therefore be deleted and covered by other policies.
594	Paul Butler obo TW Fields (ST7)	not sound	<p>As outlined in the SoCG the criterion should be deleted on account of there being no ecological value in this area of the site due to previous infrastructure works that have taken place by a statutory undertaker.</p> <p>Alternative proposed: If the criterion is due to be retained we request that the following wording be included: -</p> <p>x. Should further survey work confirm the 'Osboldwick Meadows' site's value as a candidate Site of Importance for Nature Conservation, the development shall minimise the impacts of access from Murton Way on the 'Osboldwick Meadows' site and provide compensatory provision for any loss.</p>

MM3.25 Policy SS9 explanation – paragraph 3.48
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1 representation – 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
594	Paul Butler obo TW Fields (ST7)	sound	The proposed modification is supported as it aligns with the proposed modification MM3.19 as outlined by the Council.

MM3.26 Policy SS10: Land North of Monks Cross			
1 representation – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
891	Johnson Mowat obo Redrow Homes ST8	not sound	<p>Wording fails to recognise how the site will be laid out with sports pitches straddling the boundaries in the green wedge.</p> <p>Alternative proposed: needs to end with ... “where necessary or appropriate”.</p>

MM3.27 Policy SS10: Land North of Monks Cross			
1 representation – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
891	Johnson Mowat obo Redrow Homes ST8	not sound	<p>Garth Road at this point is a lane in private ownership and a link is not guaranteed. The word ‘link’ needs to be removed. The Green Wedge is achievable through the provision of public open space.</p> <p>Alternative proposed: “Provide a new green wedge containing public open space to the west of the site south of the Garth Road lane...”</p>

MM3.28 Policy SS10: Land North of Monks Cross			
1 representation – 1 sound			

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
891	Johnson Mowat obo Redrow Homes ST8	sound	We support this change.

MM3.29 Policy SS10: Land North of Monks Cross			
1 representation – 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
378	Quod obo Langwith Development Partnership Ltd	sound	<p>Wording regarding the assessment of cumulative transport impacts with other strategic sites should be the same for all strategic policies.</p> <p>Alternative proposed: Policy wording for criterion (x) should be consistent with policies for ST8, ST9, ST14 and ST15 as suggested in MM3.54 for SS13.</p>

MM3.30 Policy SS10: Land North of Monks Cross			
No representations received			

MM3.31 Policy SS11: Land North of Haxby			
3 representations – 2 sound / 1 n/a			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	sound	Our Client supports the amendment to reflect the level of homes being indicative as it considered that the site can deliver more than 735 and the level of homes should not be artificially constrained.
979	Stantec obo BDWH and Vistry Homes ST9	sound	Our Client supports the amendment to reflect the level of homes being indicative as it considered that the site can deliver more than 735 and the level of homes should not be artificially constrained.

1010	Janet White		Potential change to dwelling numbers is disingenuous; the developer can choose to increase the number at will.
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MM3.32 Policy SS11: Land North of Haxby			
2 representations – 2 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	sound	Our Client raised objections to this requirement as it is duplicated elsewhere, its deletion is therefore supported.
979	Stantec obo BDWH and Vistry Homes ST9	sound	Our Client raised objections to this requirement as it is duplicated elsewhere, its deletion is therefore supported.

MM3.33 Policy SS11: Land North of Haxby			
3 representations – 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	not sound	Support consistent between GI6 and SS11. Further to this we support the amendment to not require all types of open space as previously drafted as that was undeliverable, unnecessary and unsound. The new requirement to also provide open space in accordance with Policies GI2a and GI6 implies that this is a separate requirement to the indicative open space on the policies map. If so then this has never been examined, was not debated or discussed and is unreasonable as it requires more open space than other allocations with no evidence as to why this is necessary. The open space provided to the south of the site should be capable of complying with all open space policies, not an extra requirement. This should therefore be deleted.
979	Stantec obo BDWH and Vistry Homes ST9	not sound	Support consistency between GI6 and SS11. Further to this we support the amendment to not require all types of open space as previously drafted as that was undeliverable, unnecessary and unsound. The new requirement to also provide open space in accordance with Policies GI2a and GI6

			implies that this is a separate requirement to the indicative open space on the policies map. If so then this has never been examined, was not debated or discussed and is unreasonable as it requires more open space than other allocations with no evidence as to why this is necessary. The open space provided to the south of the site should be capable of complying with all open space policies, not an extra requirement. This should therefore be deleted.
1010	Janet White	not sound	Objects to change of wording re open space 'may be included' which has potential to cut down open space needs.

MM3.34 Policy SS11: Land North of Haxby			
3 representations – 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	not sound	The removal of as required and inclusion of a reference to viability provides more flexibility as this enables the applicant to demonstrate that the scheme cannot provide these facilities. It is however considered that this still implies they are necessary, and it is for the applicant to prove otherwise, when there is no evidence for any community facilities. On this basis we continue to object to this requirement, and it should be deleted.
979	Stantec obo BDWH and Vistry Homes ST9	not sound	The removal of as required and inclusion of a reference to viability provides more flexibility as this enables the applicant to demonstrate that the scheme cannot provide these facilities. It is however considered that this still implies they are necessary, and it is for the applicant to prove otherwise, when there is no evidence for any community facilities. On this basis we continue to object to this requirement, and it should be deleted.
1010	Janet White	not sound	By stating 'subject to viability' rather than 'as required' the paragraph puts the viability for the developer above the needs of the community and allows the developer an opt out.

MM3.35 and MM3.36 Policy SS11: Land North of Haxby			
No representations received			

MM3.37 Policy SS12: Land West of Wigginton Road			
1 representation – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	not sound	<p>We maintain the view outlined in the agreed SoCG that the reference to the delivery of 1000 homes within the Local Plan period has no real weight in the future decision making process and as such it should be removed as the housing trajectory outlines the timescales for the delivery of homes at the site.</p> <p>Alternative proposed: This element of Policy SS12 should therefore be amended to read as follows: - ... It will deliver approximately 1,348 dwellings, approximately 1200 1000 units of which will be delivered within the plan period....</p>

MM3.38 Policy SS12: Land West of Wigginton Road			
1 representation – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	not sound	<p>the developers preference to retain and amend criterion ii so that it provides clearer guidance in respect of the development being able to deliver a higher proportion of larger family housing to reflect the 'garden village' approach.</p> <p>Alternative proposed: The developers wish to retain the following amended criteria within the policy: ii. Deliver a sustainable housing mix, including the potential to deliver a higher proportion of larger family homes (approx. 35-40%), than that identified in the Council's most up to date Strategic Housing Market Assessment</p>

MM3.39 Policy SS12: Land West of Wigginton Road			
1 representation – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	not sound	The developers wish to maintain the position that the policy should state the explicit education requirements for the site as set out in the Council's Local Plan evidence base, which outlines the requirement for a 2-form entry primary school at the site The approach to meeting the need generated by the development for secondary school places outlined within the modification is supported

MM3.40 Policy SS12: Land West of Wigginton Road			
1 representation – 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	sound	Whilst the proposed modification is supported it remains key to the delivery of the allocation that the routes shown on the proposal maps are treated as entirely being indicative and that the only weight to be attached to them should be solely in relation to the proposed connection with the Clifton Moor Roundabout and Wigginton Road.

MM3.41 Policy SS12: Land West of Wigginton Road			
5 representations – 5 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Notes distinction between modified wording and that proposed to SS9, 10, 11 and 13. Further modification proposed. Alternative proposed: Further modification proposed, to read: "The transport and highways impacts of the development should be assessed individually and cumulatively with sites ST7, ST8, ST9, and ST15."

332	York Environment Forum	not sound	The equivalent modified wording for SS9, 10, 11 and 13 reads "... of the site development should be assessed individually and cumulatively with ...". It makes clear the site's impacts need to be assessed individually as well as cumulatively. Alternative proposed: "... be assessed individually and cumulatively with ..."
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	The equivalent modified wording for SS9, 10, 11 and 13 reads "... of the site development should be assessed individually and cumulatively with ...". It makes clear the site's impacts need to be assessed individually as well as cumulatively
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	not sound	modification references a number of site allocations, including Site Ref. ST15. Site Ref. ST15 is located on the opposite side of the City and will have a far greater proportional impact on City's highway network than Site Ref. ST14. The inclusion of references to a number of housing allocations within the proposed policy modification therefore lacks clarity and is not consistent with the Council's evidence base for the site, and may lead to Site Ref. ST14 being required to deliver mitigation measures beyond its site-specific impact on the local highway network. Alternative proposed: vii. The transport and highways impact of the development should be assessed, to ensure sustainable transport provision at the site is achievable.

MM3.42 Policy SS12: Land West of Wigginton Road			
2 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	Deleting the reference to a dedicated public transport route across the A1237 ring road is contrary to commitments C-D1 and C-D7 made in York's adopted Enhanced Partnership and Bus Service Improvement Plan.
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	not sound	For clarity and effectiveness, the developers believe that the policy wording should confirm that the Council is delivering these works, as outlined in the Council's evidence base which supports the Local Plan.

		Alternative proposed: viii. Phased development which reflects the delivery of dualling works to the A1237 outer ring road, upgrades and creation of a 4th arm to the Clifton Moor Gate roundabout and pedestrian/cycle underpass to connect Clifton Moor to the site which are being funded and delivered by the Council.
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MM3.43 Policy SS12: Land West of Wigginton Road			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
199	Airedon Planning obo Mr J Harrison ST14	not sound	Inappropriate use of public funds to subsidise bus links needed to this unsustainable site.
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	sound	

MM3.44 Policy SS12: Land West of Wigginton Road			
3 representations – 1 sound / 1 not sound / 1 n/a			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
199	Airedon Planning obo Mr J Harrison ST14	not sound	The Green Belt boundaries associated with ST14 should be drawn at the time the allocation is made through the Local Plan process and not at a later date during any subsequent planning application or masterplanning process. The approach is inconsistent with para 143 of the NPPF.

232	Stephen Lornie		As the proposed Plan only covers a finite number of years and future editions are likely to make further amendments to Green Belt boundaries to permit further developments, it seems odd to require one of the few wholly new settlements to install boundary features that would preclude further extension of the settlement. Indeed, earlier drafts of the plan envisaged such further extension at this site via inclusion of adjacent "safeguarded" land (removed from the greenbelt but not allocated for development during the plan).
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	sound	

MM3.45 Policy SS12: Land West of Wigginton Road			
1 representation – 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	sound	

MM3.46 Policy SS12 explanation – paragraph 3.61			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
199	Airedon Planning obo Mr J Harrison ST14	not sound	CYC has failed to appropriately assess ST14 and its associated access road locations within the context of the Green Belt to which they will sit. It is considered that the planning application stage is too late to be considering such fundamental issues and that should any potential impact on the Green Belt and its setting be caused by the access roads, this could render the whole allocation inappropriate and unsuitable.

966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	sound	whilst the proposed modification is supported it remains key to the delivery of the allocation that the final design, layout and route of the roads will need to be informed by the detailed technical and master planning work which is taking place as part of the preparation of the planning application.
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MM3.47 Policy SS13: Land West of Elvington Lane			
6 representations – 6 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	The reduction in the quantum of development for ST15 as set out in SS13, from around 2,200 dwellings to an expectation of 560 dwelling within the plan period, will not create a sustainable community (NPPF 2012 Para 52), or, because of the very high transport infrastructure costs, meet the linked services requirements of NPPF 2012 Paras 7, 17 & 70.
332	York Environment Forum	not sound	The reduction in the quantum of development for ST15 (from around 2,200 dwellings to 560 dwelling within the plan period) will not create a sustainable community as required in NPPF 2012 Para 52
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
378	Quod obo Langwith Development Partnership Ltd	not sound	Object to modification to change the delivery expectation to 560 homes during plan period. Evidence presented in Hearing Sessions demonstrated delivery of 1040 homes during plan period. Modification requested. Alternative proposed: MM is modified to state: “...it will deliver approximately 3,339 dwellings of which it is expected that around 1,040 will be delivered within the Plan period...”
886	York Labour Party	not sound	The reduction in the quantum of development for ST15 (from around 2,200 dwellings to 560 dwelling within the plan period) will not create a sustainable community as required in NPPF 2012 Para 52
995	Gary Green	not sound	In ST15 only 560 units are to be delivered within the plan period. The loss of BMV land for food production and the negative impact on the rural character of the landscape is unsound based on this strategy. A precedent for rejecting ST15 can be found with the

		findings of the inspectorate for Bracknell & Forest Local Plan where a similar plan for a garden village with a small number of houses envisaged within the plan period, was found to be legal but unsound. This was described as making a limited contribution when assessed against the five purposes of the Green Belt as set out in paragraph 138 of the Framework. The same criteria should be applied to ST15. The proposed physical development and the associated infrastructure requirements of a new GSJ on the A64 would result in significant landscape harm in a sensitive location and would also have a considerable negative impact on the rural character of the landscape. This is unjustified when only 560 units are to be delivered.
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MM3.48 Policy SS13: Land West of Elvington Lane			
1 representation – 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification

MM3.49 Policy SS13: Land West of Elvington Lane			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	As the proposed Plan only covers a finite number of years and future editions are likely to make further amendments to Green Belt boundaries to permit further developments, it seems odd to require one of the few wholly new settlements to install boundary features that would preclude further extension of the settlement. Indeed, earlier drafts of the plan envisaged such further extension at this site via inclusion of adjacent "safeguarded" land (removed from the greenbelt but not allocated for development during the plan).

378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
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MM3.50 Policy SS13: Land West of Elvington Lane			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification

MM3.51 Policy SS13: Land West of Elvington Lane			
6 representations – 1 sound / 5 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
52	Pauline Bramley	not sound	No recognition of the effects on SSSI Heslington Tilmire a special sensitive area–The removal of the 5 year before development can commence span to establish and re-establish will have a devastating effect on both the fauna and flora. It has taken careful management over many years to establish alongside the area referred to as OS10 , all encompassed in a Higher Level Scheme . No description of a zone buff er – no buff er zone can protect from domestic pets. The area will be “saturated and destroyed “ from the eff ects of walkers, dogs , bikes from the proposed town OS15.
75	Heslington Parish Council	not sound	P.29 (v) We welcome the specification of biodiversity protection for Elvington Airfield SINC. Please add “for protection of the agricultural bird assemblage including granivorous birds” Rationale: see supporting documentation. (vii) The mitigation hierarchy is contradictory, problematic and requires further consideration. Please see supporting documentation. Add “potential adverse effects on Heslington Tillmire SSSI remain. The SA should be reviewed following further changes proposed to the policy” (SA Addendum Jan 2023 p.33), “and prior to commencement of the development.” p.30

			<p>Second bullet point of (vii) regarding master planning for recreation around ST15, add “precedence must always be given to protection of the SSSI and mitigation for Airfield SINC.” p.30 (viii) the 5 year time span for ecological mitigations should be reinstated in order to ensure sufficient time for different flora to develop and bird colonies to establish successfully.</p> <p>Alternative proposed: P.29 (v) Elvington Airfield SINC. Please add “for protection of the agricultural bird assemblage including granivorous birds” (vii): Add “potential adverse effects on Heslington Tillmire SSSI remain. The SA should be reviewed following further changes proposed to the policy” (SA Addendum Jan 2023 p.33), “and prior to commencement of the development.” Regarding master planning for recreation around ST15, add “precedence must always be given to protection of the SSSI and mitigation for Airfield SINC.” P.30 (viii) the 5 year time span for ecological mitigations should be reinstated in order to ensure sufficient time for different flora to develop and bird colonies to establish successfully.</p>
231	Fulford Parish Council	not sound	<p>National policy already requires a minimum BNG of 10% so the proposed requirement vi) adds little. viii should be strengthened to require time for the new habitat to be sufficiently established before existing wildlife areas lost.</p> <p>Alternative proposed: Deliver ecological and compensation measures so that these are well-established prior to commencement of the rest of the development. They must be...</p>
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
1001	Richard Bramley	not sound	The original 5 years prior to development should remain in order to be effective.
1046	Shaun Walton	not sound	This site is totally inappropriate and moving habitats is extremely detrimental and CANNOT be mitigated!

3 representations – 1 sound / 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	(ix) “otherwise referred to as Langwith Stray.” Delete this wording which is erroneous. The Minster Way is a long distance footpath between York Minster and Beverly Minster. A small section runs along the lane called Langwith Stray. It also runs on the bridleways around the Tillmire SSSI as indicated in our response to MM3.51. Alternative proposed: (ix) “otherwise referred to as Langwith Stray.” Delete this wording which is erroneous.
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
1001	Richard Bramley	not sound	Inaccurate statement. Minster Way is a footpath . Langwith Stray is a road connecting Long Lane to Firtree Farm Heslington.

MM3.53 Policy SS13: Land West of Elvington Lane			
2 representations – 4 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	p.30 (xi) Where this possible school site overlaps with an existing SINC this needs to be highlighted and mitigation procedures listed here including the wording “for the existing agricultural bird assemblage including granivorous birds whose needs differ from wetlands mitigation.” See also MM3.51 Alternative proposed: (xi) Where this possible school site overlaps with an existing SINC this needs to be highlighted and mitigation procedures listed here including the wording “for the existing agricultural bird assemblage including granivorous birds whose needs differ from wetlands mitigation.”
332	York Environment Forum	sound	Welcome the amendment to make provision for a secondary school on this site.
365	Rachael Maskell MP	sound	Support

378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
886	York Labour Party	sound	We welcome the amendment

MM3.54 Policy SS13: Land West of Elvington Lane			
8 representations – 41 sound / 7 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
52	Pauline Bramley	not sound	MM 3.5.4 Primary access ST15 to A64 shown “indicatively” in the LP is very different from the route and detailed designs in EX_HS_P3_M7_EL_8 e.g. Appendix 1. CYC’s indicative route would seem duplicitous. The amount of green belt required for ST 15, and its compensatory ST10 and the associated infrastructure required is not justified.
75	Heslington Parish Council	not sound	<p>p.31 (xii) We welcome recognition of the transport and highway impacts of the site. But it is diffi cult to imagine how “proportionate mitigation” will be achieved for an additional raised GSJ. Primary access ST15 to A64 shown “indicatively” in the LP is very diff erent from the route and detailed designs in EX_HS_P3_M7_EL_8 e.g. Appendix 1, which have not yet been consulted on. CYC’s indicative route appears disingenuous. The list of sites requiring assessment of cumulative transport and highway impacts is incomplete. Please add ST4. p.31 (xiii) We welcome delivery of a new link road from ST15 to Hull road and note that this, along with “works to the south of Grimston Bar Interchange” will require a very considerable investment. We would like to suggest an alternative solution which addresses both synergy between neighbouring sites and is closer to the indicative route shown than EX_HS_P3_M7_EL_8. Please see supporting documentation.</p> <p>Alternative proposed: P.31 (xii): The list of sites requiring assessment of cumulative transport and highway impacts is incomplete. Please add ST4.</p> <p>P.31 (xiii): suggest an alternative solution which addresses both synergy between neighbouring sites and is closer to the indicative route shown than EX_HS_P3_M7_EL_8</p>
103	York Civic Trust	not sound	Modified policy is non-compliant with NPPF 2012 Para 17, 28, 32, 35, 41, 58 & 156, or DfT’s 2015 guidance on Transport evidence bases in plan making paras 2, 3, 5 & 8.

			<ul style="list-style-type: none"> - fails to identify adequate active travel of public transport links to the site, to ST26 or to Fulford Secondary School - No mention of bus priority or rapid transport - No dedicated services to York city Centre or other key destinations - No service to central Leeds - No reference to segregated overpass across the A64 (referring to EX/CYC/79) <p>Alternative proposed: Recommends the Council commissions a report which identifies the additional sustainable travel infrastructure and services required, and to reflect this in an early update to the plan.</p>
332	York Environment Forum	not sound	Modification relates to the Sustainable Transport Study for the site (EX/CYC/89) which fails to identify adequate active travel or public transport links to the site. The Council to commission a report which clearly identifies the additional sustainable travel infrastructure and services required, and to reflect this in an early update to the plan.
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification for SS13. However, request modifications to other strategic policies relating to cumulative testing and proportionate mitigation regarding transport and highway impacts of the site. Alternative proposed: MM3.54 modifies in relation to ST15 but the same requirements for cumulative testing and proportionate mitigation, are not applied to the other site allocations (ST7, ST8, ST9, ST14, ST27 and ST36). LDP request that the associated strategic policies for these six strategic sites are modified in the same manner.
420	Jane Moorhouse	not sound	Concerned with traffic and transport relating to ST15, ST26, H39 and E9 on Elvington village. Consider that Elvington Lane is already over capacity and not sufficiently considered in the plan.
886	York Labour Party	not sound	Modification relates to the Sustainable Transport Study for the site (EX/CYC/89) which fails to identify adequate active travel or public transport links to the site. The Council should commission a report which clearly identifies the additional sustainable travel infrastructure and services required, and to reflect this in an early update to the plan.

MM3.55 Policy SS13: Land West of Elvington Lane

4 representations – 1 sound / 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
52	Pauline Bramley	not sound	Langwith Stray, Long Lane and Common Lane, a rural single track is an unsuitable road to create a safe cycle and pedestrian routes from ST15 to Heslington and the University of York. Lane widths of between 3.2m and 3.9m are not acceptable for cycling in mixed traffic. There should be no vehicular access from ST15 to Heslington Village along these routes to maintain the character and setting of Heslington Village and for the safety and well being of the existing business and residential users
75	Heslington Parish Council	not sound	<p>p.31 (xiv) As discussed at the hearing and agreed verbally by CYC, please see 39:00 to 42:31 on Phase 4; 13/9/22; Day 5; Matter 7; Transport; PM (1/3) – YouTube , that detailed routing of Active Travel is inappropriate at a strategic level. The precise routing of active travel routes to ST15 should be a matter of local decisions at the planning stage. We propose replacing the whole sentence with “Create safe cycle and pedestrian routes from ST15 to Heslington and the University of York, ensuring no vehicular access from ST15 to Heslington Village along these routes to maintain the character and setting of Heslington Village and to minimise impact on the narrow road traffic routes within and around the village built area.” See also MM3.54 p.31 (xv) The proposal to enhance cycle routes via bridleways "near the site" and in effect across SSSI is misguided and contrary to MM3.51 (vii). We suggest deletion point (xv). Please see supporting documentation for MM3.55</p> <p>Alternative proposed: p.31 (xiv): propose replacing the whole sentence with “Create safe cycle and pedestrian routes from ST15 to Heslington and the University of York, ensuring no vehicular access from ST15 to Heslington Village along these routes to maintain the character and setting of Heslington Village and to minimise impact on the narrow road traffic routes within and around the village built area.”</p> <p>See also MM3.54 p.31 (xv) The proposal to enhance cycle routes via bridleways "near the site" and in effect across SSSI is misguided and contrary to MM3.51 (vii). We suggest deletion point (xv).</p>
75	Heslington Parish Council	not sound	p.31 (xiv) As discussed at the hearing and agreed verbally by CYC, please see 39:00 to 42:31 on Phase 4; 13/9/22; Day 5; Matter 7; Transport; PM (1/3) – YouTube , that detailed routing of Active Travel is inappropriate at a strategic level. The precise routing

			<p>of active travel routes to ST15 should be a matter of local decisions at the planning stage. We propose replacing the whole sentence with “Create safe cycle and pedestrian routes from ST15 to Heslington and the University of York, ensuring no vehicular access from ST15 to Heslington Village along these routes to maintain the character and setting of Heslington Village and to minimise impact on the narrow road traffic routes within and around the village built area.” See also MM3.54 p.31 (xv) The proposal to enhance cycle routes via bridleways "near the site" and in effect across SSSI is misguided and contrary to MM3.51 (vii). We suggest deletion point (xv). Please see supporting documentation for MM3.55</p> <p>Alternative proposed: p.31 (xiv): propose replacing the whole sentence with “Create safe cycle and pedestrian routes from ST15 to Heslington and the University of York, ensuring no vehicular access from ST15 to Heslington Village along these routes to maintain the character and setting of Heslington Village and to minimise impact on the narrow road traffic routes within and around the village built area.” See also MM3.54 p.31 (xv) The proposal to enhance cycle routes via bridleways "near the site" and in effect across SSSI is misguided and contrary to MM3.51 (vii). We suggest deletion point (xv).</p>
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
1001	Richard Bramley	not sound	These narrow bendy routes are not suitable for cyclists .Conflict with other road traffic cars ,lorries and tractors.
1001	Richard Bramley	not sound	The creation of year round cycle routes across the Heslington Tilmire would add to the level of recreational disturbance to the SSSI.

MM3.56 Policy SS13: Land West of Elvington Lane			
4 representations – 1 sound / 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment

75	Heslington Parish Council	not sound	<p>p.32(xvi) Omission Langwith Stray. The original wording “dedicated secure access for existing local residents and landowners” implied all the users. Restoring Langwith Stray to the list upholds this intention. Also exclude traffic from ST15 to Langwith Stray to</p> <ul style="list-style-type: none"> - protect the Tillmire SSSI and wetlands mitigation for Lower Derwent SPA/RAMSAR from traffic emissions - minimise recreational access to SSSI and in particular dog walkers and mountain bikers in order to maintain the SSSI’s rare fauna and flora - ensure that Langwith Stray does not become a de facto car park for vehicles coming into it via ST15 causing obstruction for farm machinery, domestic and business users and important services such as emergency vehicles, refuse collection and Ouse and Derwent drainage board. <p>We suggest amend (xvi) to “Ensure that vehicular access to connect existing premises only along Common Lane/Long Lane and Langwith Stray to Heslington is retained as part of the wider ST15 access arrangements.”</p> <p>Alternative proposed: p.32(xvi) Restore Langwith Stray to the list. Amend (xvi) to “Ensure that vehicular access to connect existing premises only along Common Lane/Long Lane and Langwith Stray to Heslington is retained as part of the wider ST15 access arrangements.”</p>
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
995	Gary Green (On behalf of Residents and Businesses of Langwith Stray)	not sound	<p>p.32(xvi) Omission Langwith Stray. Amend to “Ensure that vehicular access to connect existing premises only along Common Lane/Long Lane and Langwith Stray to Heslington is retained as part of the wider ST15 access arrangements.” Cutting off Langwith Stray from Heslington and providing access via new infrastructure for ST15 is unacceptable. It would cause us to have a much longer indirect route to/from York; bring traffic from A64 and/or ST15 and beyond into a very narrow lane causing obstruction including for emergency vehicles; bring a large amount of traffic into an ecologically sensitive area; prevent farmers bringing agricultural machinery to their land; obstruct Ouse and Derwent drainage board in its work. As residents of Heslington Village, we want direct access so as to use its facilities regularly, and access our neighbours on Long Lane &</p>

			<p>Common Lane. Any other solution for us will cause great harm to a Spa/RAMSAR mitigation site and an SSSI. See supporting documentation.</p> <p>Alternative proposed: P.32(xvi) Omission Langwith Stray. Amend to “Ensure that vehicular access to connect existing premises only along Common Lane/Long Lane and Langwith Stray to Heslington is retained as part of the wider ST15 access arrangements.”</p>
1001	Richard Bramley	not sound	<p>Langwith Stray must be added to the list of access roads in paragraph xvi. Otherwise residents will be stranded.</p> <p>Alternative proposed: Langwith Stray must be added to the list of access roads in paragraph xvi.</p>

MM3.57 Policy SS13 explanation – paragraph 3.64			
3 representations – 1 sound / 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	<p>Additional sentence. “Public Transport and car access to ST27 will not be via Heslington Village including Low Lane and Ox Close Lane in line with MM3.78 para 3.101” The list of sites requiring sustainable transport connections is incomplete. Please add ST4.</p> <p>Alternative proposed: The list of sites requiring sustainable transport connections is incomplete. Please add ST4.</p>
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
420	Jane Moorhouse	not sound	Concerned with traffic and transport relating to ST15, ST26, H39 and E9 on Elvington village. Consider that Elvington Lane is already over capacity and not sufficiently considered in the plan.

MM3.58 Policy SS13 explanation – paragraph 3.67

4 representations – 1 sound / 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	<p>p.32 Again ST4 is not integrated into the traffic planning. Add ST4 “, ST4 and Elvington Business Park (ST26)” Heslington Parish Council does not accept the need for an additional grade separated junction. In place of “The provision of a new grade separated junction onto the A64”, insert “The provision of access to an upgraded Grimston Bar Interchange for ST4, ST27 and ST15, minimising disruption to existing settlements and the rural setting of York and maximising Active Travel opportunities” Please see supporting documentation. P.33 Final sentence is ambiguous and needs to be corrected.</p> <p>Alternative proposed: P.32: ST4 is not integrated into the traffic planning. Add ST4. In place of “The provision of a new grade separated junction onto the A64”, insert “The provision of access to an upgraded Grimston Bar Interchange for ST4, ST27 and ST15, minimising disruption to existing settlements and the rural setting of York and maximising Active Travel opportunities”</p>
378	Quod obo Langwith Development Partnership Ltd	sound	Support modification
420	Jane Moorhouse	not sound	Elvington Airfield should be a heritage asset, noting speed records and military history. ST15 results in destruction of this heritage asset and the location of the 'new town' should be moved closer to the A64. Views on the location have previously been put forward for consideration together with the Parish Council.
1001	Richard Bramley	not sound	The cost of the infrastructure required for ST15 raises serious questions about its economic viability.

MM3.59 to MM3.65
No representations received

MM3.66 Policy SS18: Station Yard, Wheldrake
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2 representations – 2 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	sound	Our Client objected to this requirement as it is covered by other policies and therefore supports its deletion.
375	Wheldrake Parish Council	sound	The Parish Council have no objections to the revised text - also in section 67-68. We would like to see the developer contribute to restoring the defunct Primary Care surgery in the village.

MM3.67 Policy SS18: Station Yard, Wheldrake			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	sound	Our Client objected to the requirement for high quality design as this is subjective and conflicts with other policies in the plan. The amendment retains the need for good design, without including requirements that are subjective and unsound. The amendment is therefore supported.

MM3.68 Policy SS18: Station Yard, Wheldrake			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	sound	The clarification on the level of mitigation required is supported.

MM3.69 Policy SS18: Station yard, Wheldrake			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment

339	Stantec obo BDWH ST7, ST9, ST14, ST36	sound	Our Client supports this amendment.
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MM3.70 Policy SS19: Queen Elizabeth Barracks, Strensall			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO ST35	not sound	<p>Continue to object to proposed deletion of ST35 to make the plan sound. This is based on: HRA (2020) not taking account of Natural England's favourable condition assessment in 2021; no evidence that indicates current use is having an adverse effect on integrity; applicable law and Reg 105 of the Habitat Regulations not constituting a bar to the adoption of the plan with the allocation/policy; sufficient mitigation proposed designed to deal with potential effects (set out in July 2022 documents); inconsistent approach between strategic sites applied. Inspectors only need to consider 'net additional' impacts of retaining ST35 on SAC in context of mitigation.</p> <p>Alternative proposed: Suggested amendments to SS19 proposed through DIO's response to York Additional Consultation (July 2021, para 6.1) which is considered to make the plan sound. See also comments against MM 9.6 (proposed policy G12a).</p>
381	Yorkshire Wildlife Trust	sound	Support deletion of ST35 and policy SS19. Plan is positively prepared by responding to objections from Natural England and Yorkshire Wildlife Trust amongst other objections. The plan will also be more consistently justified, effective and consistent with national and international policy on the protection of habitats.

MM3.71 Policy SS20: Imphal Barracks, Fulford Road			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO ST36	sound	DIO support proposed modification and confirm ongoing commitment to the 2030 date for disposal.

MM3.72 Policy SS20: Imphal Barracks, Fulford Road			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO ST36	sound	DIO support modification and agree that if mitigation is required it should be proportionate and related to mitigating any impacts of the proposed development.

MM3.73 Policy SS20: Imphal Barracks, Fulford Road			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO ST36	sound	DIO support the deletion of this modification as there is no need to duplicate a requirement that is addressed elsewhere in the plan, in this instance proposed policy H3.

MM3.74 Policy SS20: Imphal Barracks, Fulford Road			
2 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
118	Historic England	not sound	<p>Imphal Barracks has considerable historic interest including its buildings and openspaces. The policy wording is no explicitly clear that a separate proportionate assessment of the architectural and historic interest of the site, which should be used to inform a masterplan.</p> <p>Alternative proposed: Policy SS20, amend the first bullet point under modified criterion iii to read: ‘- an assessment of the architectural and historic interest of the site...’</p>
345	Avison Young obo DIO ST36	not sound	DIO object to this proposed modification in its current form. Whilst a simplification of the criteria is welcomed, it creates ambiguity as to the timing of preparing a masterplan for

		<p>the site. DIO consider that it would not be unreasonable for the policy to require “a planning application to be accompanied by a masterplan” that does certain things specified by this modification.</p> <p>Alternative proposed: Policy to require a “a planning application to be accompanied by a masterplan” that does certain things specified by this modification</p>
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MM3.75 Policy SS20: Imphal Barracks, Fulford Road			
3 representations – 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO ST36	not sound	<p>Object to proposed change from “considered” to “assessed, and where necessary, mitigated” as it is not required to make the plan sound. Considered not necessary to duplicate national policy protections and does not consider evidence to demonstrate a need for assessment in this regard.</p> <p>Alternative proposed: Do not implement proposed change in wording from 'considered' to 'assessed, and where necessary, mitigated'.</p>
345	Avison Young obo DIO ST36	not sound	<p>“Tillmire SSSI” is also c.3.2km from Imphal Barracks and separated by several roads and the A64 so appears sufficiently distant not to be affected by the development of Imphal Barracks and the reference to this designation appears to be in error. It is unclear to us how the Heslington Tillmire SSSI is at risk of effects from the Imphal Barracks allocation.</p> <p>Alternative proposed: Amend error referring to Heslington Tillmire SSSI.</p>
345	Avison Young obo DIO ST36	not sound	<p>Error regarding supporting paragraph 3.93 which states “Walmgate Stray is a UK priority habitat for semi-improved grassland.” If Walmgate Stray habitat is of the quality to classify it as Lowland Acid Grassland or Lowland Meadows, it would be a Priority Habitat or Habitat of Principal Importance as listed under Section 40 of the NERC Act 2006. Not included and should be amended.</p> <p>Alternative proposed: Remove “Walmgate Stray is a UK priority habitat for semi-improved grassland” as not listed in Section 40 of NERC Act 2006.</p>

MM3.76 Policy SS21: Land South of Airfield Business Park, Elvington

No representations received

MM3.77 Policy SS22: University of York Expansion

6 representations – 6 not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	<p>p.38 Bullet 1, A landscaped mitigation buff er outside the boundary of ST27 site is unacceptable because it is a further loss of food producing BMV land at a time of food insecurity the buff er could allow creeping development it is contradicted in MM3.78 para 3.98a and 3.99a “the expansion site must provide a landscape buff er” and ambiguous in the remainder of 3.99a. Amend the wording of the fi rst bullet point to “Create an appropriately landscaped buff er wholly within the site.” Ensure that subsequent paras in MM3.78 are consistent with this. bullet 2 typo change ST5 to ST4 Bullet 3, delete “to the south of the site” Add “and ST4” to both 3 and 4. Cumulative transport impacts. Impacts should explicitly include noise and light pollution and loss of BMV land for food production as well as increased congestion, ecological and health harms. A junction south of ST27 onto the A64 is not the best plan. We suggest an alternative with fewer problems in our supporting documentation.</p> <p>Alternative proposed: P.38 Bullet 1: Amend the wording of the fi rst bullet point to “Create an appropriately landscaped buff er wholly within the site.” Bullet 2: typo change ST5 to ST4 Bullet 3: delete “to the south of the site” Add “and ST4” to 3 & 4</p>
103	York Civic Trust	not sound	<p>The modifications include an expectation to “Explore feasibility of a junction on the A64 to the south of the site with delivery in conjunction with ST15” which is totally incompatible with the subsequent explanation which states that the site is designed to be car-free (para 3.100) and that all vehicular access is to be via Kimberlow Lane (para 3.101).</p>

			Alternative proposed: Delete "Explore feasibility of a junction on the A64 to the south of the site with delivery in conjunction with ST15."
118	Historic England	not sound	Preferable for this site to remain undeveloped; see hearing statement matter 2 [HS/P3/M2/U&C/11]. However, if ST27 is allocated, support the modification in SS22 provide an appropriate landscaped buffer to the A64 in order to mitigate the heritage and landscape impacts of development.
332	York Environment Forum	not sound	We strongly recommend that this addition be deleted on the grounds that the expectation to "Explore feasibility of a junction on the A64 to the south of the site with delivery in conjunction with ST15" is incompatible with the subsequent explanation which states that the site is designed to be car-free (para 3.100) and that all vehicular access is to be via Kimberlow Lane (para 3.101)
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	We strongly recommend that this addition be deleted on the grounds that the expectation to "Explore feasibility of a junction on the A64 to the south of the site with delivery in conjunction with ST15" is incompatible with the subsequent explanation which states that the site is designed to be car-free (para 3.100) and that all vehicular access is to be via Kimberlow Lane (para 3.101)

MM3.78 Policy SS22 Explanation			
3 representations – 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	P39 para 3.98 Any evidence that this statement is based on should be referenced here. Sharing the evidence is important for maintaining "Town and Gown" relations on a mutually beneficial footing as was evident at the Hearings. p.40 3.98 final deleted sentence. This sentence should be reinstated and Campus 3 changed to Campus East in order to encourage student accommodation within the campus, in agreement with MM7.1 p81 policy ED1. p.41 para 3.100 Add ST4 before ST15 so "housing allocation at ST4 and ST15..." p.41 Para 3.101 HPC welcomes this assurance that there will be no new vehicular access to ST27 and Campus East via Heslington Village including Low Lane and

			<p>Ox Close Lane. The suggestion of a public transport route via a GSJ on A64 south of Common lane to ST27 (EX-CYC-89) and car access as far as ST27 (ex-hs-p3-m7-el-8-langwith-quod P12) should be explicitly ruled out.</p> <p>Alternative proposed: P39 para 3.98: add evidence</p> <p>P.40 3.98 final deleted sentence. This sentence should be reinstated and Campus 3 changed to Campus East</p> <p>P.41 para 3.100: Add ST4 before ST15</p>
118	Historic England	not sound	<p>Should site ST27 be allocated in the Local Plan would support the inclusion of a modified paragraph 3.98a, as suggested under SS22. It is also suggested that 3.98a and 3.99a could be combined.</p> <p>Alternative proposed: Supporting text to Policy SS22:</p> <p>a) Paragraph 3.98a, amend to read: ‘ST27 plays a critical part in the attractive setting of the city. The site has a distinctive landscape quality and provides accessible countryside to walkers and cyclists on the land and public footpaths. The land to the west is particularly important for maintaining the setting of Heslington village and key views. it has a distinctive landscape quality and provides accessible countryside to walkers and cyclists on the land and public footpaths. The expansion will bring development close to the A64 Ring Road with implications for the interface between the southern edge of York and the countryside to its south. To mitigate any impacts on the historic character and setting of the city, the expansion site must provide a landscape buffer between development on the site and the A64. This can be provided within the site where parallel to the A64, but beyond it on the other boundaries – maximising the developable area while responding sensitively to the landscape setting. This will be established through the masterplanning of the site.’</p> <p>b). Delete Paragraph 3.99a.</p>
232	Stephen Lornie	not sound	<p>Paragraphs 3.98a and 3.98b seem somewhat repetitive, particularly with regard to boundary mitigation/treatment along the A64. Has this policy change been thoroughly proof-read??</p>

MM3.79 Policy SS23: Land at Northminster Business Park

1 representation – not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	Review wording of 'Provide a high-quality landscape scheme.....' for sense check. Alternative proposed: Sense check 'Provide a high-quality landscape scheme.....'

Section 4: Economy and Retail

MM4.1 Policy EC1: Provision of Employment Land
No representations

MM4.2 Policy EC1 Provision of Employment Land			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO E18	not sound	DIO is generally supportive of the proposed amendments to EC1 specifically with respect of E18 Towthorpe Lines. Considered necessary to update the Use Class references. However, lack of evidence to restrict employment sites as proposed; therefore not justified. For E18 considered appropriate to also include B2 and B8 uses and more inclusion of use class E sub categories. Alternative proposed: The Modification should be amended to allow for developments within Use Classes E(g)(ii) R&D; E(g)(iii) and an element of office Use Class E(g)(i). This part of the policy would be more appropriately amended from “Light Industrial (Use Class E)” to “E(g) class uses” to facilitate future redevelopment opportunities. Previously also supported modification to E18 to include wording : “B1(a) and B1(b) uses in addition to B1(c), B2 and B8 uses to diversify market attractiveness and demand and hence enhance the viability and deliverability of the proposed development.”
590	WNY Chamber of Commerce	not sound	York Central, while welcome, is long-term delivery and likely to be for high quality offices rather than start ups and small businesses/light industrial uses. Queries availability of several employment sites (ST7, E16 and E10). MM4.2: does not reflect the current status

			<p>of employment allocations or EX/CYC/107/7; does not provide sufficient land to accommodate 650 jobs/annum; will not enable sustainable development.</p> <p>Alternative proposed: Urges Inspector to approve the Plan but require an early, if not immediate review to consider: contemporary evidence; current economic position; consistency with new combined authority. Requests review of availability of employment land (EC1)</p>
972	O'Neills	not sound	<p>Inconsistencies identified between EX/CYC/107/7. Evidence base doc identifies E16 as no longer available; E10 as developed at lower density than proposed in EC1 with no capacity for additional development; ST37 development approved with no capacity for further development. Figures in table for EC1 therefore inaccurate reflection of situation and employment floorspace required cannot be achieved. Further concerns raised about ability of ST5, ST19, ST26 and E18 to deliver floorspace proposed. Also, ST27 will only provide for knowledge based uses linked to university not general employment use. Policy will not provide sufficient land for 650 new jobs pa as set out in SS1</p>

MM4.3 Policy EC1 explanation			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
590	WNY Chamber of Commerce	not sound	<p>York Central, while welcome, is long-term delivery and likely to be for high quality offices rather than start ups and small businesses/light industrial uses. Queries availability of several employment sites (ST7, E16 and E10). MM4.2: does not reflect the current status of employment allocations or EX/CYC/107/7; does not provide sufficient land to accommodate 650 jobs/annum; will not enable sustainable development.</p> <p>Alternative proposed: Urges Inspector to approve the Plan but require an early, if not immediate review to consider: contemporary evidence; current economic position; consistency with new combined authority. Requests review of availability of employment land (EC1)</p>

MM4.4 Policy EC1 explanation – table 4.1			
2 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
231	Fulford Parish Council	not sound	Table 4.1 and the requirements assume that all of the new jobs will require employment space to be created. The application of any reasonable assumption for home- and hybrid working would result in a substantial reduction in the need for new office floorspace as set out in Table 4.1.
590	WNY Chamber of Commerce	not sound	<p>York Central, while welcome, is long-term delivery and likely to be for high quality offices rather than start ups and small businesses/light industrial uses. Queries availability of several employment sites (ST7, E16 and E10). MM4.2: does not reflect the current status of employment allocations or EX/CYC/107/7; does not provide sufficient land to accommodate 650 jobs/annum; will not enable sustainable development.</p> <p>Alternative proposed: Urges Inspector to approve the Plan but require an early, if not immediate review to consider: contemporary evidence; current economic position; consistency with new combined authority. Requests review of availability of employment land (EC1)</p>

MM4.5 Policy EC1 Explanation paragraph 4.8a			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
345	Avison Young obo DIO ST35	not sound	<p>Object to and disagree with statement "<i>Although the common is already under intense recreational pressure...</i>". No evidence to support statement.</p> <p>Alternative proposed: Remove statement "Although the common is already under intense recreational pressure..." from new paragraphs 4.8a and 9.8d</p>

MM4.6 Policy EC2 Explanation paragraph 4.9
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3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
965	ROK Planning obo Danehurst Development	not sound	The evidence base is considered out of date and the demand for employment space unjustified. The need to implement an 18-month marketing requirement is unsubstantiated and it is recommended that this should be reduced to 12 months for office space and industrial uses, and removed altogether for other employment generating uses, including car showrooms.
970	Kathryn Jukes obo various	not sound	No justification for 18 month marketing and overly onerous. Risk of long term empty buildings, anti-social problems. Lack of commercial properties in York therefore any long term vacant properties must be surplus and sub-optimal. Also, no justification for protecting other types of employment land outside office and industrial uses as that would mean protecting land that has not been identified to meet employment needs during the plan period Alternative proposed: Change 18 month marketing requirement to 6 or 12 months. Amend final sentence of mod to 'This includes those employment-generating uses covered by Table 4.1 and policy EC1'.
972	O'Neills	not sound	Requirement to demonstrate effective marketing is overly onerous; conflicts with retail policies which seek to protect vitality of identified centres, and appropriate town centre uses. Policy wording requires the marketing requirement for all employment generating uses, including retail. 18 month requirement is excessive.

MM4.7 Policy EC5: Rural Economy			
2 representations – 1 not sound / 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
969	Rapleys obo Caravan and Motorhome Club	not sound	Addition of 'on a temporary or permanent basis' not supported, original wording preferred to protect viability of site and wider rural economy. Assertion that caravan sites ubiquitously cause harm is unfounded and undermines soundness

1014	Hugh Robert Griffiths	sound	
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MM4.8 Policy EC5 Explanation – paragraph 4.17			
4 representations – 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	New paragraph seems poorly worded/structured - despite the rationale being "to provide clarity".
969	Rapleys obo Caravan and Motorhome Club	not sound	Modification not supported - assertion that caravan sites are incompatible with GB and harm openness would inhibit Caravan Clubs ability to expand and prejudice viability
970	Kathryn Jukes obo various	not sound	Conflict between MM4.7 and MM4.8 in terms of caravan sites being temporary or permanent. Needs clarification. Caravan sites are not generally inconsistent with policy requirements to protect openness. NPPF para 28 supports rural tourism and para 89 sets out exception through which caravan parks might be allowed. Mod is overly onerous.
972	O'Neills	not sound	Text is consistent in relation to policy EC5 which suggests temporary caravan sites may be permitted. Supporting text is ambiguous and inconsistent with NPPF re openness and GB exceptions

MM4.9 Policy R1: Retail Hierarchy and Sequential Approach			
2 representations – 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
208	Rapleys obo British Sugar PLC	not sound	<p>Proposed additional wording is welcomed as a partial response to previous comments and representations. However this additional wording is not effective, as it does not provide suitable support for the provision of appropriate retail floorspace provision at the British Sugar / Manor School site, as supported by Policy SS6</p> <p>Alternative proposed: "Where new retail provision is proposed as part of the development of a strategic site in accordance with support within the relevant strategic site policy, this will not be subject to an impact assessment, providing the provision is</p>

			appropriate in scale to serve the local day to day shopping needs of residents of the site and the wider local community."
972	O'Neills	not sound	Policy should be renamed Town centre uses hierarchy to ensure consistency with UCO and avoid confusion.

MM4.10 Policy R2: District and Local Centres and Neighbourhood Parades
No representations received

MM4.11 Policy R3: York City Centre Retail			
2 representations – 1 not sound / 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
972	O'Neills	not sound	Policy should be renamed York city centre uses to ensure consistency with UCO and avoid confusion. Supporting text only references class E, should include sui generis drinking establishments and HFTA too. Will impact vitality of city centre and is contrary to NPPF and objectives of LP.
978	Peter Garbutt	sound	Minor modification on page 49, para 3 to change 'proposals map' to 'policies map'. Alternative proposed: Minor modification on page 49, para 3 to change 'proposals map' to 'policies map'.

Section 5: Housing

MM5.1: Policy H1: Housing Allocations			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Welcomes the additional criterion for ‘For sites that contain existing open space (**), where appropriate, it should be retained on-site or re-provided off-site.’ However, off site provision should be a last resort. Recommends removal of this aspect of the modification and reinstatement of original text.</p> <p>Alternative proposed: Delete "For sites that contain existing open space (**), where appropriate, it should be retained on-site or re-provided off-site." and replace with original text "Where sites contain existing open space this will be an important consideration in the development of the site and the open space needs of the area will need to be assessed."</p>
208	Rapleys obo British Sugar PLC	not sound	<p>The policy requires existing open space on identified sites to be retained or re-provided off site. The wording is not necessary, as these matters are covered in Policy SS6 and should be deleted.</p>
332	York Environment Forum	not sound	<p>Recommend the removal of the open space aspect of the proposed modification off-site provision should be an avenue of last resort</p> <p>Alternative proposed: The previous open space text should be reinstated.</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	<p>Welcome the additional criterion for ‘For sites that contain existing open space (**), but off-site provision should be an avenue of last resort.</p> <p>Alternative proposed: Original text should be reinstated</p>

MM5.2 Policy H1, table 5.1			
4 representations – 3 not sound/1 sound			

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Policy should be further strengthened by a more robust identification of the housing mix to be provided, noting Oxford's policy approach which establishes a proportionate mix on sites of 25 homes or more.</p> <p>Alternative proposed: All Strategic Sites should have an identified target mix, added to Table 5.1. Requests Inspectors make a recommendation to the council in their report for an early review of the adopted plan to achieve this. Further, current housing monitoring fails to cover the balance issue; the cumulative tally of housing types being granted permission and being delivered against evidence should be monitored and published.</p>
208	Rapleys obo British Sugar PLC	sound	Proposed modified wording of Part (v) of Policy H10 is supported.
345	Avison Young obo DIO ST35	not sound	Objects to the proposed deletion ST35 within Table 5.1. Considered that this modification is not required to make the plan sound. As set out in MM3.70.
345	Avison Young obo DIO H59	not sound	<p>Objects to the proposed deletion of H59 within Table 5.1. Considered that this modification is not required to make the plan sound. Rationale: evidence produced by CYC [EX/CYC/117a] is a narrative as opposed to an HRA linking to previous HRA work and likely individual effects of this site are not properly assessed. Deletion is not evidence based.</p> <p>Alternative proposed: This MM is not evidence based and H59 need not be deleted to make the Plan sound.</p>

MM5.3 Policy H1 Explanation – paragraphs 5.4 to 5.16			
3 representations – 3 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	No text on monitoring and what happens if the delivery begins to fail. There needs to be something added to end of Para 5.10 that identifies through annual monitoring reports that any significant departure from the Revised Trajectory (2017-2033) that suggests delivery would be 10% less than that shown for the period 2023 to 2028 would trigger a Plan Review if that delivery cannot be rectified by actions

620	O'Neills obo Galtres Garden Village	not sound	Disagree with opening statement as Plan will not meet future housing requirements of the city. There will be a shortfall in housing for 8 years into plan period. Housing numbers should be amended to 1024. Para. 5.10 contradicts Councils evident in EX/CYC/76a - build out rates cannot be increased in response to demand. A broader range of sites is required. Alternative proposed: Change opening paragraph to- 'An estimated yield is attributed to each site allocated for housing and is an indicative figure to demonstrate how the Local Plan housing requirement might be met.' Also delete 'A number sites are not expected to complete within the plan period. The total allocated capacity of sites exceeds the Council's housing requirement and if delivery rates can be increased then these sites could provide additional supply to react to market signals'.
891	Johnson Mowat obo Redrow Homes ST8	not sound	No text on monitoring and what happens if the delivery begins to fail. There needs to be something added to end of Para 5.10 that identifies through annual monitoring reports that any significant departure from the Revised Trajectory (2017-2033) that suggests delivery would be 10% less than that shown for the period 2023 to 2028 would trigger a Plan Review if that delivery cannot be rectified by actions

MM5.4 Policy H1 Explanation			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
620	O'Neills obo Galtres Garden Village	not sound	Proposed changes to figure 5.1 in relation to revised housing trajectory Alternative proposed: Provide revised housing trajectory to replace the one in this mod.

MM5.5 Table 5.2			
No representations			

MM5.6 Policy H2: Density of Residential Development			
2 representations – 1 not sound / 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
255	HBF	sound	The HBF supports the additional flexibility but recommends it is extended to all sites, not just strategic sites.
378	Quod obo Langwith Development Partnership Ltd	not sound	Residential densities for strategic sites will be subject to masterplanning. Modifications to policy H2 are therefore not necessary as masterplanning will determine the appropriate density target bespoke for each site. This modification is therefore irrelevant to Strategic sites. Alternative proposed: Modification is not required.

MM5.7 Policy H2 explanation			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	How come Figure 5.2 for density zones has been replaced/updated but the following Figure 5.3 for high frequency public transport corridors has not - despite dating from 2014? That's almost 10 years ago now! Surely this ought to also be updated to reflect a more recent picture of public transport in the city (accepting that "covid" impacts and recent government interventions around bus subsidies are still in flux).

MM5.8 Policy H3: Balancing the Housing Market			
5 representations – 4 not sound / 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Proposed modification is a major weakening in achieving balanced communities, contrary to NPPF 2012 para 17 and 50. Given failure to deliver the required levels of family

			<p>accommodation for the local population, recommends previous wording in relation to balancing the housing market is retained.</p> <p>Alternative proposed: Delete "expect developers to provide housing solutions that contribute to meeting York's housing needs, as identified in the latest Local Housing Needs Assessment (LHNA) and in any other appropriate local evidence. New residential development should therefore maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities. " and replace with "seek to balance the housing market across the plan period and work towards a mix of housing identified in the Strategic Housing Market Assessment (SHMA). Proposals for residential development will be required to balance the housing market by including a mix of types of housing which reflects the diverse mix of need across the city. This includes flats and smaller houses for those accessing the housing market for the first time, family housing of 2 to 3 beds and homes with features attractive to older people.."</p>
255	HBF	sound	The HBF considers that this modification is appropriate.
332	York Environment Forum	not sound	<p>Is a major weakening of the previous policy wording that makes achieving a balance unachievable in practice contrary to NPPF 2012 paras 17 (planning principle 3) and 50. Evidence from the 2021 census demonstrates failure to deliver the required levels of family accommodation for the local population</p> <p>Alternative proposed: The previous wording of the clause should be reinstated</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	<p>Is a major weakening of the previous policy wording that makes achieving a balance unachievable in practice contrary to NPPF 2012 paras 17 (planning principle 3) and 50. Evidence from the 2021 census demonstrates failure to deliver the required levels of family accommodation for the local population</p> <p>There is no guidance on the appropriate proportion of housing meeting higher accessibility standards. Further clarity is needed.</p> <p>Alternative proposed: The previous wording of the clause should be reinstated</p>

MM5.9 Policy H3: Balancing the Housing Market			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
255	HBF	not sound	Concerned that meeting higher access standards could be perceived as more than encouragement by the way it is written.
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	The policy lacks clarity over 'appropriate proportion'. Clarity would be better if absolute targets were used.
891	Johnson Mowat obo Redrow Homes ST8	not sound	The policy lacks clarity over 'appropriate proportion'. Clarity would be better if absolute targets were used.

MM5.10 Policy H4: Promoting Self and Custom House Building			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
208	Rapleys obo British Sugar PLC	not sound	<p>The approach set out in Policy H5 as now proposed is not positively prepared in that it requires a minimum proportion of such homes on strategic site, rather than supporting the provision of such homes where this is appropriate and meets market demand.</p> <p>Alternative proposed: Revised wording of the policy (in line with that suggested by the HBF in their representations on the draft Policy) represents a positively prepared, justified and effective policy:</p> <p>On strategic sites (5a and above) applications which include dwelling plots for sale to self-builders or to small / custom house builders will be supported. Plots should be made available at market rates, to be agreed through section 106 agreements, which are fairly related to the associated site / plot costs. In considering the nature and scale of provision the Council will have regard to viability considerations and site-specific circumstances."</p>

255	HBF	not sound	The Council has not evidenced the need for strategic sites to provide for self and custom build homes. Not clear how appropriate demand would be identified, or how this demand could be identified by a developer when they are looking to purchase a site or design a development for a site.
339	Stantec obo BDWH ST7, ST9, ST14, ST36	not sound	The reference to the demand being provided by the Council on these sites is supported and the modification ensures the policy is sound. However, objection to the removal of the site size as this now applies to all sites including the smaller strategic sites where custom build may not be necessary or viable.

MM5.11 Policy H5: Gypsies and Travellers			
10 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
60	MH Planning obo York Travellers Trust	not sound	Inconsistent with national policy to treat those that meet the definition and do not meet the definition of travellers the same; no suitable sites are provided to deliver the 5 year need and no developable sites thereafter; policy obligations are unenforceable; Part b is effectively geared to meeting affordable provision.
208	Rapleys obo British Sugar PLC	not sound	There is no justification nor evidence provided that demonstrates that a pitch or pitches on a strategic allocation is an appropriate location that will meet the specific needs of the Gypsy and Traveller community. the policy should, instead of requiring on site provision, seek to secure contributions, where appropriate and subject to viability assessment, in the form of commuted sum payments from the development of strategic sites, which can provide for the creation of suitable pitches off site, on land identified by the Council.
255	HBF	not sound	The HBF continues to have concerns that the full implications of this policy in relation to viability and deliverability have not been considered by the Council. Alternative proposed: Part (b) of the policy should be deleted
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	The proposed amendments to Policy H5 of the Local Plan seek to place a greater burden on the developers of strategic sites on account of the Council being unable to allocate specific sites to meet Gypsy and Traveller needs.

			<p>Alternative proposed: Commuted sum payments to contribute to development of pitches elsewhere will only be considered where it is demonstrated that on site delivery is not achievable due to site constraints or other material considerations; or where there are no suitable and available alternative sites for the required number of pitches that can be secured by the developer; or where commuted sum payments would facilitate qualitative or quantitative improvements to existing local authority sites</p>
594	Paul Butler obo TW Fields (ST7)	not sound	<p>(Part B) on-site provision within strategic sites is undesirable to the Gypsy and Traveller community and therefore undeliverable.</p> <p>Financial contributions could and should be used to facilitate qualitative and quantitative improvements to the City's existing Gypsy & Traveller sites in order to remedy the existing quality issues. Such an approach would also enable the delivery of additional pitches within these sites through improving the efficient use of current available space within them. The acceptability of financial contributions should be widened to capture other material considerations.</p> <p>Alternative proposed: Commuted sum payments to contribute to development of pitches elsewhere will only be considered where it is demonstrated that on site delivery is not achievable due to site constraints or other material considerations; or where there are no suitable and available alternative sites for the required number of pitches that can be secured by the developer; or where commuted sum payments would facilitate qualitative or quantitative improvements to existing local authority sites.</p>
825	ClIr Warters	not sound	The Clifton and Osbaldwick sites are not suitable for further expansion
963	Yew Tree Associates obo Newby, Linfoot and Linfoot	not sound	Proposal will remove the area of land approved for horse grazing under planning permission for the extension to the travellers site
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	not sound	<p>(Part B) on-site provision within strategic sites is undesirable to the Gypsy and Traveller community and therefore undeliverable.</p> <p>Financial contributions could and should be used to facilitate qualitative and quantitative improvements to the City's existing Gypsy & Traveller sites in order to remedy the existing quality issues. Such an approach would also enable the delivery of additional pitches within these sites through improving the efficient use of current available space within them. The acceptability of financial contributions should be widened to capture other material considerations.</p>

			Alternative proposed: Commuted sum payments to contribute to development of pitches elsewhere will only be considered where it is demonstrated that on site delivery is not achievable due to site constraints or other material considerations; or where there are no suitable and available alternative sites for the required number of pitches that can be secured by the developer; or where commuted sum payments would facilitate qualitative or quantitative improvements to existing local authority sites.
982	York Travellers Trust	not sound	Inconsistent with national policy to treat those that meet the definition and do not meet the definition of travellers the same; no suitable sites are provided to deliver the 5 year need and no developable sites thereafter; policy obligations are unenforcable; Part b is effectively geared to meeting affordable provision.
987	Steven Pittam obo York Human Rights City Network	not sound	Heard failures as presented by York's Travellers Trust. Concerned that the approach breaches Council's obligations under Human Rights Act 1998 and the Equality Act 2010 as well as Council's own aspiration to put fundamental rights at heart of policy. Recommend approach is revised and further engagement with York Travellers Trust to find workable approach.

MM5.12 Policy H5: Gypsies and Travellers			
4 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter. Furthermore, current sites do not have suitable community facilities and these must be provided on all new sites and must be upgraded on existing sites, before any expansion takes place
594	Paul Butler obo TW Fields (ST7)	not sound	The first criteria of criterion c should be amended to only reference designations which are clearly established within the adopted proposal map. This would ensure that developers would be provided with clear guidance from which to use to identify potential alternative site provision Alternative proposed: I. do not conflict with the objective of conserving York's internationally, nationally and locally significant nature conservation sites, green

			corridors and areas with an important recreation function as designated on the proposal map
886	York Labour Party	not sound	We oppose the modification to a) that increases the number of pitches on the existing Council sites, which are already large. Concerns that the wording of the modifications at part b as regards alternative land or commuted sums will lead to difficulties and could frustrate the actual delivery of such sites. The offer of off-site land should include the additional requirement that it is land with a valid planning permission for gypsy and traveller use.
966	Paul Butler obo Barratt Homes, Bellway Homes, and TW Fields (Clifton Moor) Ltd	not sound	The first criteria of criterion c should be amended to only reference designations which are clearly established within the adopted proposal map. This would ensure that developers would be provided with clear guidance from which to use to identify potential alternative site provision Alternative proposed: I. do not conflict with the objective of conserving York's internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function as designated on the proposal map

MM5.13 Policy H6: Travelling Showpeople			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
145	Ken Guest	not sound	Objects to allocation of 3 plots at The Stables, Elvington (SP1) for Travelling Show People
420	Jane Moorhouse	not sound	Object to allocation at The stables, Elvington on basis that the temporary planning permission has expired so plot doe not legal exist. Site for a Travelling Showpeople Yard would be more appropriately based on land that allowed mixed use and which is not surrounded by residential properties.

MM5.14			
No representations received			

MM5.15 Policy H5 and H6 Explanation Para 5.38 and Table 5.3			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
60	MH Planning obo York Travellers Trust	not sound	The needs of boat dwellers have not been assessed in accordance with NPPF or the Housing Act
420	Jane Moorhouse	not sound	Object to allocation at The stables, Elvington on basis that the temporary planning permission has expired so plot does not legal exist. Site for a Travelling Showpeople Yard would be more appropriately based on land that allowed mixed use and which is not surrounded by residential properties.
982	York Travellers Trust	not sound	The needs of boat dwellers have not been assessed in accordance with NPPF or the Housing Act

MM5.16 Policy H5 and H6 Explanation – paragraph 5.42			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
60	MH Planning obo York Travellers Trust	not sound	Inconsistent with national policy to treat no definition and definition travellers the same; no suitable sites are provided to deliver the 5 year need and no developable sites thereafter; policy obligations are unenforcable; Part b is effectively geared to meeting affordable provision.
982	York Travellers Trust	not sound	Inconsistent with national policy to treat no definition and definition travellers the same; no suitable sites are provided to deliver the 5 year need and no developable sites thereafter; policy obligations are unenforcable; Part b is effectively geared to meeting affordable provision.

MM5.17 Policy H7: Student Housing
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14 representations – 13 not sound / 1 sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
849	O'Neill's obo University of York	not sound	<p>Change next academic year in way university will deliver education - moving to 2 semesters; modular degrees with modules completed at different rates potentially over longer periods; hybrid in-person and online courses. Nomination agreements are not supported as the financial risk transfers from the developer to the university; also following the end of the nomination agreement rents could be raised. UoY cannot enter into nomination agreements or long leases due to existing legal restrictions from legacy contractual arrangements. Policy should require that rent is negotiated between developer and university; and need for development is evidenced by a 5yr student number forecast - secured via S106/condition. Change to semesters requires accommodation to be available all year, therefore bullet point iv no longer appropriate. Requirement for PBSA to contribute to AH will be recouped via rental charges which will have a significant impact on students cost of living - CIL evidence supersedes EX/CYC/107/3 and renders plan unsound. Any available headroom should be retained to contribute to affordability of student housing. Restriction that PBSA should be occupied only by full time students overly restrictive given widening teaching routes and semestrisation; allowance should also be made to use the accommodation for conference delegates outside semesters.</p> <p>Alternative proposed: Revise iia. Development will be permitted where either university is able to demonstrate that there will be unmet need to coincide with the delivery of bedspaces. Revise iv. The accommodation shall be occupied by students registered with a university in the city and actively pursuing their studies, those attending for conferencing, short courses, CPD or visiting staff. Conditions or obligations shall be imposed to secure compliance with this requirement and for the proper management of the properties. Remove all references to AH contributions.</p>
886	York Labour Party	not sound	We welcome the proposed modifications which will help to alleviate some of the negative consequences from unplanned rapid expansion of the University of York in particular, and increase the supply of affordable housing. We would however suggest one modification to address a potential loophole in the new section iv) as regards the exemption for university

			<p>owned properties that are used to accommodate the accommodation needs of its students.</p> <p>Alternative proposed: The exemption [iv] should be linked to the continuing use as accommodation for its students, with the provision becoming applicable at the point it ceases to be used for such purposes.</p>
901	O'Neill's obo York St Johns	not sound	<p>Change next academic year in way university will deliver education - moving to 2 semesters; modular degrees with modules completed at different rates potentially over longer periods; hybrid in-person and online courses. Nomination agreements are not supported as the financial risk transfers from the developer to the university; also following the end of the nomination agreement rents could be raised. UoY cannot enter into nomination agreements or long leases due to existing legal restrictions from legacy contractual arrangements. Policy should require that rent is negotiated between developer and university; and need for development is evidenced by a 5yr student number forecast - secured via S106/condition. Change to semesters requires accommodation to be available all year, therefore bullet point iv no longer appropriate. Requirement for PBSA to contribute to AH will be recouped via rental charges which will have a significant impact on students cost of living - CIL evidence supersedes EX/CYC/107/3 and renders plan unsound. Any available headroom should be retained to contribute to affordability of student housing. Affordable student housing should be considered. Impact on York St John's operational and financial viability has not been considered - university is subsidising student accommodation. Anticipating a large increase in student numbers over next 3-4 years. Policy is too prescriptive in relation to students who bring family members with them; conferences and summer schools. CIL rates will further exacerbate affordability.</p> <p>Alternative proposed: Revise iia. Development will be permitted where either university is able to demonstrate that there will be unmet need to coincide with the delivery of bedspaces. Revise iv. The accommodation shall be occupied by students registered with a university in the city and actively pursuing their studies, those attending for conferencing, short courses, CPD or visiting staff. Conditions or obligations shall be imposed to secure compliance with this requirement and for the proper management of the properties. Remove all references to AH contributions.</p>

964	Watkins Jones Group	sound	<p>Elements of the draft policy are acceptable: Demonstration of need (point i) ; Located within an appropriate and accessible location (point ii) ; No detrimental impact on the amenity of nearby residents and the design and access arrangements would have a minimal impact on the local area (point iii).; The PBSA will be occupied only by full time students enrolled and the development will be effectively managed (point iv).</p>
964	Watkins Jones Group	not sound	<p>Object to nomination agreement (point iia). It is rare for universities to enter into nomination agreement on studio rooms and policy approach will constrain if not stop PBSA within York on grounds of viability and the needs of students (developers have to provide studio apartments within their PBSA development wither all or in part as demonstrated in the Council's Technical Note). For new PBSA to be viable and deliverable, it's likely that the policy burden will be shifted to universities requiring them to pay a combination of higher rents rising with inflation and long-term nomination agreements. The agreement cannot be provided at planning applications stage - it is usual for institutions to sign up to a commercial contract closer to development completion. Explanatory text should address this</p> <p>Alternative proposed: "i. it can be demonstrated that there is quantitative need for student accommodation which cannot be met on campus. This demonstration of need can also be satisfied through a nomination agreement for the majority of accommodation for occupation by students of one or more of the University of York and York St. John University secured by planning condition prior to occupation".</p>
964	Watkins Jones Group	not sound	<p>The requirement for an affordable housing contribution from PBSA is not supported by robust and sound evidence and the requirement should be removed from the policy. The calculation is overly complex and average property process are not defined figures so open to interpretation</p>
965	ROK Planning obo Danehurst Development	not sound	<p>Part i of Policy H7 should be revised to acknowledge that PBSA is a form of housing and that there is an identified existing shortfall of student bedspaces. The policy should be updated to encourage PBSA in sustainable locations across the city.</p>

965	ROK Planning obo Danehurst Development	not sound	Requirement for nomination agreement should be removed. It would significantly stymie PSBA development in the city putting pressure on HMOs. Furthermore, Universities will not sign up to a formal agreement before planning permission is granted.
965	ROK Planning obo Danehurst Development	not sound	There is no rationale for affordable housing contribution on PBSA sites and this requirement should be omitted from the policy in its entirety. The NPPF (2021) clearly states that exemptions to affordable housing should be applied where developments propose specialist accommodation, including PBSA. The viability appraisal set out in the CYC Local Plan Viability Technical Note is also entirely unsound
975	O'Neil's obo Helmsley Group	not sound	<p>Nominations agreements are unworkable in York. The requirement presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York. In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.</p> <p>MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS). EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound</p> <p>Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for affordable student accommodation for which there is an identified need.</p> <p>To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount.</p> <p>In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students.</p> <p>Alternative proposed: BP iia should be deleted iv replaced with: Conditions or obligations shall be imposed to secure occupation of a majority of rooms by students of one or more higher education providers² during the</p>

			academic year and to ensure that any ancillary use does not result in a material change of use of the building.
976	O'Neil's obo Foss Argo Developments	not sound	<p>Nominations agreements are unworkable in York. The requirement presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York. In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.</p> <p>MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS). EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound</p> <p>Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for affordable student accommodation for which there is an identified need.</p> <p>To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount.</p> <p>In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students.</p>
991	Quod obo IQ Student Accommodation	not sound	<p>Concern raised around nomination agreements; occupation limits; and AH contributions. Nomination agreements give universities too much control, and not necessary to make plan sound. Also not necessary given criterion i of the policy, requiring a demonstration of need. Restriction to full time students limits use by those in part time education and out-of-term letting. CIL viability contradicts LP viability. Policy will increase costs for students and pressure on traditional residential sector while requiring financial contributions to alleviate these pressures.</p> <p>Alternative proposed: Revise iv to 'The accommodation shall be occupied only by students enrolled in higher education at the University of York or York St John University</p>

			during term time. Short term lettings to non-student residents outside of term time will be supported. Conditions or obligations shall be imposed to secure compliance with this requirement and for the proper management of the properties throughout the year."
1012	Merrill Davis	not sound	<p>Refs to the impact of the local plan on the delivery of sufficient numbers of student accommodation to cater for current and expected shortfall. Plan is unsound it does not cater for the needs of students.</p> <ul style="list-style-type: none"> - Strategic housing sites will have inconsequential effect on levels of student housing, therefore all student housing need will be met by the university or off-campus providers; - Focus of off-site provision has been on windfall sites. - Plan is based on under estimated student growth figures. <p>The Plan should expand the University's allocation ST27 and enable further allocations to accommodate off-site windfall development for student housing.</p>

MM5.18 Policy H7 Explanation – paragraph 5.47			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
849	O'Neill's obo University of York	not sound	Alternative proposed: Revise last bullet point of 5.47 to - 'Methods of education delivery, likely future supply of accommodation based on extant planning permissions, residential accommodation strategies and estates strategies of the relevant provider'. Text in 5.48 stating only full time students included is no longer appropriate as provision is more flexible.
901	O'Neill's obo York St Johns	not sound	Alternative proposed: Revise last bullet point of 5.47 to - 'Methods of education delivery, likely future supply of accommodation based on extant planning permissions, residential accommodation strategies and estates strategies of the relevant provider'. Text in 5.48 stating only full time students included is no longer appropriate as provision is more flexible.
973	Pearce Planning obo Fusion Students	not sound	Evidence points to significant increased demand for student accommodation within York both from UK and international students, supporting the longer term outlook for demand and that the private sector will need to play a role in meeting this. At present the policy focus is on delivery on campus which is not practical to meet the level of demand predicted and so any policies dealing with off campus

			<p>provision need to supportive of growth in a viable and effective way.</p> <p>Clause i: The imposition of the additional text which effectively adds a sequential test to the delivery of PBSA is unnecessary, negative, and not justified. This additional text should be removed to allow choice and meet the needs of the students</p> <p>Clause iii: Imposing a blanket requirement for a nominations agreement with the Universities is an unnecessary and onerous requirement that will delay and stifle the amount of PBSA that will come forward in the City. The two Universities would still be able to offer support for PBSA developments and comment on any schemes coming forward without the need for a formalised nomination agreement. There could be for example a percentage applied to each scheme to secure terms with the developer at an agreed rental level but to unilaterally require a nominations agreement for all bedspaces effectively ransoms private developers and is not reasonable or positively prepared, justified or effective.</p> <p>Clause v: occupation only by full time students enrolled in courses of one academic year or more also places unnecessary restrictions and does not provide sufficient flexibility to meet the differing needs of students.</p> <p>Object to requirement for new student accommodation to provide a financial contribution towards delivering affordable housing. It is not viable an inconsistent with NPPF.</p>
975	O'Neil's obo Helmsley Group	not sound	<p>Nominations agreements are unworkable in York. The requirement presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York. In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.</p> <p>MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS).</p> <p>EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound</p> <p>Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for</p>

			<p>affordable student accommodation for which there is an identified need. To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount.</p> <p>In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students.</p>
976	O'Neil's obo Foss Argo Developments	not sound	<p>Nominations agreements are unworkable in York. The requirement presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York. In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.</p> <p>MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS). EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound</p> <p>Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for affordable student accommodation for which there is an identified need.</p> <p>To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount.</p> <p>In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students.</p>

MM5.19 Policy H9: Older Persons Specialist Housing

3 representations – not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
339	Stantec obo BDWH ST7, ST9, ST14, ST36	not sound	Discussion at the examination highlighted how a residential scheme for 147 homes on a strategic site was unlikely to provide custom build housing and older persons accommodation, together with whether there was a need in the area. If the policy is to apply to all strategic sites it should therefore include flexibility.
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	This policy lacks clarity over 'an appropriate provision'. There is an overlap with Policy H3 on accessible housing and if targets are introduced into H3 as suggested above, then the need on Strategic Sites in Policy H9 to provide accessible housing for the elderly is removed.
891	Johnson Mowat obo Redrow Homes ST8	not sound	This policy lacks clarity over 'an appropriate provision'. There is an overlap with Policy H3 on accessible housing and if targets are introduced into H3 as suggested above, then the need on Strategic Sites in Policy H9 to provide accessible housing for the elderly is removed.

MM5.20 Policy H10: Affordable Housing
No representations received

MM5.21 Policy H10: Affordable Housing			
10 representations – 1 sound / 9 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	3,265 affordable dwellings are to be delivered via policy H10. Policy SS1 sets an aspirational target to deliver at least 4,228 affordable dwellings. There is no evidence of methodology presented within the Plan as to how this will be achieved, and should be addressed if the Plan is to be effective.

253	Lichfields obo Bellway Homes	not sound	<p>The proposed modification makes a series of clarifications to the policy which we do not object to.</p> <p>We do object to: "Higher rates of provision will be sought where development viability is not compromised". It does not provide certainty to an applicant and masks the issue of failing to meet overall housing needs by suggesting an undeliverable means of possibly increasing affordable housing supply</p>
255	HBF	sound	<p>the amendment to increase the threshold at which affordable housing will be required from 2 dwellings to 5 dwellings is appropriate.</p> <p>that the simplification of Table 5.4 is appropriate</p> <p>Support amendment to part (v) of the policy to delete the reference to no more than two affordable dwellings placed next to each other</p>
255	HBF	not sound	<p>The HBF is however, concerned by the addition of text which states that higher rates of provision will be sought where development viability is not compromised. It is not clear how this element of policy would work when determining a planning application, or how would this be evidenced?</p> <p>Alternative proposed: This element of the policy should be deleted.</p>
332	York Environment Forum	not sound	<p>There is no evidence of methodology as to how this will be achieved and should be addressed if the plan is to be effective.</p>
365	Rachael Maskell MP	not sound	<p>I support York Labour Party points on this matter</p>
378	Quod obo Langwith Development Partnership Ltd	not sound	<p>Comments in relation to criterion (i). The modification to require higher rates to be sought where viability would not be undermined is not appropriate nor effective. It cannot be a requirement of Policy to provide more housing than the target, as the effect of this requirement would be for all schemes to have to provide viability evidence, even where they met the targets set out in Policy H10; this approach is unsound.</p> <p>The proposed modifications to the Policy make it clear that the targets set out in Policy H10 are a "minimum", and consequently the Policy already has an in-built approach that encourages developers to delivery more affordable housing than the policy targets. LDP propose that the following is removed from Policy H10:</p> <p>"...higher rates of provision will be sought where development viability is not compromised."</p>

			Alternative proposed: LDP propose that the following is removed from Policy H10: "...higher rates of provision will be sought where development viability is not compromised."
620	O'Neills obo Galtres Garden Village	not sound	Contradiction with wording in supporting text - viability assessments would be required to determine whether a higher than policy AH provision could be made but supporting text says won't be required. Policy should not specify minimum requirements as other site costs may impact on viability. Alternative proposed: Delete text - 'as a minimum. Higher rates of provision will be sought where development viability is not compromised'
886	York Labour Party	not sound	Modifications inadequate and will be ineffective in delivering the new SS1 target and is therefore unsound. This is because the minimum targets in Table 5.4 are too low and are not justified against meeting the new SS1 overall target. Developers and landowners are unlikely to offer more than the minimum contribution.
1044	Regina Johnson	not sound	Haxby already is overcrowded in the local primary and secondary schools. Oaken Grove school was demolished many years ago as it was not required. The surgery you are unable to get an appointment and this is due to staff shortages and after covid, nearly 3 years on it is not about to improve. Flooding in the area the drains often overflow and the land around. Traffic is unstable in the village area, unable to park and I live on Usher Lane with currently no road humps or safety for children walking to school. So how with increased housing would this issue resolve?

MM5.22 Policy H10 explanation			
4 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	How does deletion of the "artificial subdivision" section of the explanation interact with the addition of the "obviously linked" clause in the actual policy (MM5.21)? It strikes me that artificial subdivision is likely to be one of the key reasons for including the additional clause in the policy, so why remove it from the explanation? Having the wording in the

			explanation gives weight to the policy and avoids doubt if that clause is ever used to challenge a developer.
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
620	O'Neills obo Galtres Garden Village	not sound	<p>Contradiction with wording in supporting text - viability assessments would be required to determine whether a higher than policy AH provision could be made but supporting text says won't be required.</p> <p>Alternative proposed: Based on viability evidence prepared in support of the Local Plan, developments within York are expected to provide the target levels of affordable homes set out in Policy H10. Therefore, no individual assessment will be required where proposals achieve these policy requirements.</p>
886	York Labour Party	not sound	Individual site assessments will be necessary for the Council to negotiate up the minimum affordable housing contribution.

Section 6: Health and Wellbeing

MM6.1 Policy HW1: Protecting Existing Facilities			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
977	NHS Property Services, Clifton Park Hospital	not sound	<p>Planning policies should enable flexibility within the NHS state and should not be overly restrictive. This can delay the disposal of surplus and unsuitable facilities and delay reinvestment in NHS. The policy required specific forms of health re-provision and thereby restricts the ability of the NHS to provide for infrastructure requirements over the plan period</p> <p>Alternative proposed: Proposed additional bullet point: v. the loss or change of use of an existing built community facilities is part of a wider public service estate reorganisation.</p>
1017	Danielle Morgan	not sound	Requesting the Plan provides for new doctors, health facilities, schools and dentists.

MM6.2			
No representations received			

MM6.3 Policy HW1 explanation – paragraph 6.9			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	<p>Exceptional circumstances test overly onerous and not consistent with NPPF para 70.</p> <p>Alternative proposed: Rewrite to reflect tone of NPPF - 'guard against unnecessary loss of valued facilities and services'.</p>

MM6.4 Policy HW1 explanation – paragraph 6.10			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Recommends removal of ambiguous language, such as 'reasonably' or 'not reasonably', which is open to a range of interpretations. Recommends tightening language to omit all such qualifiers.
232	Stephen Lornie	not sound	Poor drafting in this section (marked with **, e.g. these two sentences: "Only in such circumstances, and when no alternative community use is possible, a loss of commercial facilities **will** be permitted. Evidence that the facilities have been appropriately marketed for a minimum of **a** two years without success will be required to demonstrate they are unviable."

MM6.5 Policy HW2: New Community Facilities			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie		<p>Addition "..where on site provision.." should be a new sentence.</p> <p>Alternative proposed: Addition "..where on site provision.." should be a new sentence.</p>

MM6.6			
No representation received			

MM6.7 Policy HW3: Built Sport Facilities			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment

970	Kathryn Jukes obo various	not sound	No indication why an audit of sports facilities is required or how it relates to Para 154 of the NPPF. No justification for new requirement.
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MM6.8
No representation received

MM6.9 Policy HW4: Childcare provision			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie		RE addition of "This will be secured as part of the planning permission or S106 agreement." - is this S106 or CIL? (separate consultation ongoing)

MM6.10 Policy HW5: Healthcare services			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	What happens when a development site policy or granted planning permission sees a need for additional healthcare services but the respective service (e.g. NHS or other) declines to deliver/co-fund those services? E.g. recent concerns around Lowfield Green and Bishopthorpe. https://yorkmix.com/concern-as-york-health-hub-is-scraped-as-residents-wait-eight-weeks-to-see-a-gp/ https://www.yorklibdems.org.uk/news/article/only-bishopthorpe-gp-practice-at-risk-of-closure
972	O'Neills	not sound	Cumulative impact of policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and viability has not been properly considered.

977	NHS Property Services Clifton Park Hospital	not sound	<p>Planning policies should enable flexibility within the NHS state and should not be overly restrictive. This can delay the disposal of surplus and unsuitable facilities and delay reinvestment in NHS. The policy required specific forms of health re-provision and thereby restricts the ability of the NHS to provide for infrastructure requirements over the plan period.</p> <p>Alternative proposed: Suggested text: Development proposals which include existing primary or secondary care services must re-provide the service as part of the proposal or demonstrate that the loss or change of use of an existing built community facility is part of a wider public service estate reorganisation, or that the facilities are no longer required or that relocating facilities would better meet the community's needs.</p>
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MM6.11 Policy HW5: Healthcare services			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie		<p>Does the York Hospital site have sufficient space to redevelop and/or expand to meet the needs of York as a growing city? There was speculation last year that any development might ideally be on an entirely different site!</p> <p>https://www.yorkpress.co.uk/news/19997627.old-tired-york-hospital-may-replaced-entirely-new-site/</p>

MM6.12 – MM6.14			
No representation received			

Section 7: Education

MM7.1 Policy ED1; University of York			
3 representations – 1 sound / 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	<p>P82 final sentence Facilities for sport etc Number this (viii) and add “Provided the land is not Best and Most Versatile (BMV) land, or in agricultural production, or a mitigation site.” The rationale for this is to conserve food production around the conurbation of York and to ensure that mitigation sites are preserved from light and noise pollution from sports facilities. It also reduces the risk of sports facilities on GB sites becoming a precursor to creeping future development into the GB.</p> <p>Alternative proposed: P82 (viii): add “Provided the land is not Best and Most Versatile (BMV) land, or in agricultural production, or a mitigation site.”</p>
118	Historic England	sound	We welcome the addition of criteria i, ii, iii, iv and vi to Policy ED1. The modified policy criteria will help to ensure that the significance of designated heritage assets on University of York Campus West and in its vicinity are appropriately conserved and enhanced.
1001	Richard Bramley	sound	On site student accommodation makes more houses available for the settled population Affordable rented and owned accommodation is essential, particularly for key workers.

MM7.2			
No representation received			

MM7.3 Policy ED1 explanation - paragraphs 7.2a, 7.2b, 7.2c, 7.2d and 7.2e			
2 representations – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment

75	Heslington Parish Council	sound	p.83 7.2d We welcome this modification to protect neighbouring York communities
118	Historic England	sound	Support addition of supporting paragraphs, particularly requirement of development brief; it provides clarity on expectations for development and requirements to inform and justify proposals.

MM7.4 Policy ED2: Campus West			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	<p>p.84 Please add a fourth bullet point indicating the total number of car parking spaces across the entire university complex ie Campus West, Campus East and the Science Park as well as the proposed number for ST27. This is to indicate the true impact on surrounding infrastructure and local communities.</p> <p>Alternative proposed: P.84: add a fourth bullet point indicating the total number of car parking spaces across the entire university complex as well as proposed number for ST27.</p>
118	Historic England	sound	Support modifications; specifically the addition of criterion i. In combination with the modifications proposed to Policy ED1, the policy requirements will help to ensure that the significance of designated heritage assets on University of York Campus West and its vicinity are appropriately conserved and enhanced.

MM7.5 Policy ED2 explanation – paragraphs 7.4, 7.4b and 7.5			
1 representation – sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
118	Historic England	sound	Support modifications to paragraph 7.4 as it provides essential guidance on the approach to be adopted when considering changes to the buildings and/or landscape of Campus West.

MM7.6 Figure 7.1			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	<p>New version of Figure 7.1 does not have a clear distinction between Campus East and Campus West - which is surely an important detail given the separate policies relevant to each site??</p> <p>Alternative proposed: Figure 7.1 should show a clear distinction between Campus East and Campus West.</p>

MM7.7 Policy ED3: Campus East			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	<p>p.86 ED3 change to 23% density restriction, Campus East The lifting of the 23% restriction on building density on Campus East should be spelt out in the main modifications not left as a note. CYC have not sufficiently justified allowing both increased density of development and expansion of the University in ST27. We request the strongest possible evidence to support CYC over-ruling the Minister of State decision of 2007 on both the density and the boundaries. Please see supporting documentation. p 87 (iii) p.84 Please add a fourth bullet point indicating the total number of car parking spaces across the entire university complex ie Campus West, Campus East and the Science Park as well as the proposed number for ST27. This is to indicate the true impact on surrounding infrastructure and local communities.</p> <p>Alternative proposed: P.86 ED3 change to 23% density restriction P.87 (iii) P84: add a fourth bullet point indicating the total number of car parking spaces across the entire university complex as well as proposed number for ST27</p>

MM7.8 Policy ED3 explanation – paragraphs 7.6 to 7.12			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Noting the removal of a range of SPDs from the Local Plan outside of the Planning Inspectors' inquiries and the statutory consultation.</p> <p>Alternative proposed: Recommends the Council provide a SPD publication programme for all relevant Policies.</p>

MM7.9 – MM7.11			
No representation received			

Section 8: Placemaking, Heritage, Design and Culture

MM8.1 Policy D1: Placemaking			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
232	Stephen Lornie	not sound	<p>Revised wording would be clearer if "will be refused" comes before the bullet points rather than tagged onto the end of the final bullet.</p> <p>Alternative proposed: Suggests revised wording for clarity if "will be refused" comes before the bullet points rather than tagged onto the end of the final bullet.</p>

MM8.2 Policy D1: Placemaking			
1 representation – sound			

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
118	Historic England	sound	The changes to Policy D1 proposed in this modification reflect the common ground agreed between Historic England and the Council in the Phase 4 Statement of Common Ground [EX/SoCG/24].

MM8.3
No representation received

MM8.4 Policy D3: Cultural Provision			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Opposes the withdrawal of the Cultural Wellbeing SPD (CYC Executive, 26th Jan 2023) which, given that the delivery of the Plan is solely reliant on the SPD, would make the Plan unsound. Alternative proposed: Reinstate the Cultural Wellbeing SPD.
332	York Environment Forum	not sound	The delivery of Policy D3 is reliant on a now dropped SPD. The withdrawal of the SPD is opposed.
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	The delivery of Policy D3 is reliant on a now dropped SPD. The withdrawal of the SPD is opposed.
1034	Guild of Media Arts	not sound	The Local Plan Draft included Policy D3 Cultural Provision and planned for a Supplementary Planning Document. Council members have supported this policy for many years. The decision not to require the SPD is ill-founded and counter to the views expressed by the LPWG. Its absence means the Plan does not meet NPPF requirement para 93. It is counter to the Council's endorsement of York's culture strategy and to York as

a UNESCO Creative City of Media Arts. The decision will have the effect of reducing economic activity, leading to inequalities of health outcome and stunting our future.

MM8.5 Policy D4: Conservation Areas			
3 representation – 1 sound / 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>The removal of reference to 'significance' is a backward step and should be reintroduced for consistency with NPPF and other modifications proposed.</p> <p>Alternative proposed: Further modification proposed, reading: "Changes of use will be supported when it has been demonstrated that the beneficial current uses of the building can no longer be sustained, where the proposed new use would not significantly harm the prevailing significance, including character, of the Conservation Area."</p>
118	Historic England	sound	<p>The changes to Policy D4 proposed in this modification reflect the common ground agreed between Historic England and the Council in the Phase 4 Statement of Common Ground [EX/SoCG/24].</p>
332	York Environment Forum	not sound	<p>Oppose the removal of reference to 'significance' of a conservation area</p> <p>Alternative proposed: "Changes of use will be supported when it has been demonstrated that the beneficial current uses of the building can no longer be sustained, where the proposed new use would not significantly harm the prevailing significance, including character, of the Conservation Area".</p>

MM8.6

No representation received

MM8.7 Policy D5: Listed Buildings

2 representation – 1 not sound / 1 n/a

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust		Note that policy covers the question of density but (incomplete)
118	Historic England	not sound	<p>The modification does not reflect the common ground agreed between Historic England and the Council in the Phase 4 Statement of Common Ground [EX/SoCG/24]. The reference to securing a sustainable future for a building, previously included as a separate statement within the policy, has been tied to the statement on change of use. Securing a sustainable future for a building at risk can be achieved through other measures and interventions other than just a change of use to a building. As such, we would request that this point is de-coupled from the statement on change of use and included as a separate sentence.</p> <p>Alternative proposed: Policy D6, amend first and second paragraphs of the modified policy text as follows: ‘Proposals affecting a Listed Building or its setting will be supported where they preserve, enhance or better reveal those elements which contribute to the significance of the building or its setting.</p> <p>Changes of use will be supported where it has been demonstrated that the proposed new use of the building would not harm its significance.</p> <p>Proposals which help secure a sustainable future for a building at risk will also be supported.’</p>

MM8.8 – 8.9
No representation received

MM8.10 Policy D6 Explanation			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
118	Historic England	not sound	Object to proposed modifications in 8.31 and suggested amendments. Third sentence where it adds the phrase ‘the most significant’ with regards to the buried

			<p>archaeological remains that should be preserved. This measure is not something that was specified within the evidence base and the vast majority of archaeological deposits within the historic core are of equivalent significance to scheduled monuments. The modification is therefore considered to be unnecessary and unhelpful.</p> <p>Fourth sentence concerned with modified text "<i>where up to 95% of the most important deposits remain preserved in situ or where it can be demonstrated that the proposals would bring substantial public benefits</i>". This is ambiguous; approach should be to avoid first or if not possible, to minimise harm and to refuse permission unless demonstrated necessary to achieve substantial public benefit that outweighs harm in line with national policy.</p>
983	Mary Urmston	not sound	<p>Paragraph 8.31 has introduced changed wording, namely: "up to 95% of the most important deposits remain preserved in situ". The inclusion of "up to" is inconsistent with the aims of the policy which is to avoid destroying more than 5% of archaeological deposits. The two words introduce uncertainty and render the explanation (and the policy) ineffective. No evidence or justification has been proved to explain why "up to" [95%] has been included.</p>

MM8.11
No representation received

MM8.12 Policy D7 Explanation – paragraphs 8.35 to 8.37			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Policy sets out requirements 'in advance of the adoption of a Local List' but not after its adoption. Recommends additional text.
103	York Civic Trust	not sound	Opposes the withdrawal of the Local Heritage List SPD (CYC Executive, 26th Jan 2023) which, given that the delivery of the Plan is solely reliant on the SPD, would make the Plan unsound.

103	York Civic Trust	not sound	Delivery partners should include York Civic Trust, who are the custodians of the Local Heritage List.
103	York Civic Trust	not sound	Under 8.38 we support the inclusion of the reference to a Local Heritage List Supplementary Planning Document and oppose the Council's withdrawal of several SPDs as approved at LPWG and Executive in Jan 2023. Also requests that under 'Delivery: 'Key Delivery Partners' to add York Civic Trust.
332	York Environment Forum	not sound	There is no indication of what applicants should do after adoption of a Local List in York.

MM8.13 – MM8.16

No representation received

Section 9: Green Infrastructure

MM9.1 Policy GI1 Green Infrastructure			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
332	York Environment Forum	not sound	Oppose the introduction of the words “Where appropriate”. This part of the modification should be rejected.
365	Rachael Maskell MP	not sound	I strongly support the York Labour Party comments on this matter and call for this modification to be rejected.
886	York Labour Party	not sound	Oppose the introduction of the words “Where appropriate”. This part of the modification should be rejected.

MM9.2 Policy GI2: Biodiversity and Access to Nature			
2 representations – 1 sound / 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
332	York Environment Forum	not sound	The policy should reflect the latest NPPF requirements rather than the less expansive 2012 version. Also disappointed that there is no commitment to updating the evidence base (such as the biodiversity audit).
345	Avison Young obo DIO	sound	<p>The terminology relating to International and National sites is not consistent with changes in referring to the national protected sites network since the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 made European law operable in the UK post-Brexit. These are more often referred to as the “national site network” for designated sites comprising the protected sites already designated under the Nature Directives, and any further sites designated under these Regulations. The terminology should at least be “International Designated” Or “Protected Site” and “National Designated” Or “Protected Site.”</p> <p>Alternative proposed: Terminology should be updated to be consistent with Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The</p>

terminology should be “International Designated” Or “Protected Site” and “National Designated” Or “Protected Site.”

MM9.3 Policy GI2: Biodiversity and Access to Nature			
5 representations – 3 sound / 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	sound	<p>p.100 (v) We support this enhanced protection. It is important that infrastructure is taken account of when planning, particularly transport infrastructure e.g. ST15 to A64 which will impact green belt, veteran native woodland and introduce light, noise and emissions pollution. For each bullet point (i) to (v) we suggest the phrase “and its associated infrastructure” is added after “development”. This would clarify that the impact of the infrastructure on biodiversity may be as great, if not greater than, the development itself and ensure that infrastructure mitigation is not overlooked or down-graded to a secondary consideration.</p> <p>Alternative proposed: P.100: For each bullet point (i) to (v) we suggest the phrase “and its associated infrastructure” is added after “development”</p>
103	York Civic Trust	not sound	<p>Questions policy's effectiveness in relying on NPPF2012. Recommend reference is made to the NPPF2021 for this policy. York Civic Trust remains disappointed that there is no commitment to updating the evidence base (such as the biodiversity audit).</p>
332	York Environment Forum	not sound	<p>The policy should reflect the latest NPPF requirements rather than the less expansive 2012 version. Also disappointed that there is no commitment to updating the evidence base (such as the biodiversity audit).</p>
383	Natural England	sound	<p>Support reference to Biodiversity net gain. However, recommend this is strengthened by minor amendments to wording.</p> <p>Alternative proposed: Modify to strengthen wording as follows:</p> <ul style="list-style-type: none"> • Reference to achieving ‘measurable’ net gains in biodiversity to align with the updated wording of the National Planning Policy Framework (NPPF) and the biodiversity gain objective introduced by the Environment Act 2021.

			<ul style="list-style-type: none"> • Highlight how biodiversity losses and gains will be measured. The latest version of the Biodiversity Metric should be used for this purpose. • Outline how the strategic significance value in the Biodiversity Metric should be applied. The Biodiversity Metric applies a higher biodiversity unit score to habitats identified as of strategic importance to the local area, further information relating to strategic significance can be found in the Biodiversity Metric 3.1 User Guide Paragraphs 5.16 -5.24. It is noted that Policy GI2 states biodiversity net gains can contribute to the recovery of priority species and habitat, however clear guidance should be provided on how relevant local priorities should be considered in relation to the strategic significance value. For example, the Local Nature Recover Strategy, Green Infrastructure Corridors, Biodiversity Action Plan Habitats, National Character Area priorities, Biodiversity Action Plans, River Basin Management Plans and Catchment Plans. This could be included within a Supplementary Planning Document.
1001	Richard Bramley	sound	When considering new link roads ,care must be taken to avoid woodland in particular.

MM9.4 – 9.5
No representation received

MM9.6 Policy GI2a: Strensall Common Special Area of Conservation (SAC)			
10 representations – 3 sound / 7 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
332	York Environment Forum	sound	Welcome the introduction of this new policy
345	Avison Young obo DIO	not sound	Objection to the addition of this policy at this stage of the plan making process (or at least that part of it which would create a 400m exclusion zone around

			<p>Strensall Common). Not required for soundness of the plan and supporting evidence (CYC's HRA) is flawed. Previously set out in Phase 4 matter 5: August 22. In summary: disagree with CYC's in principle concerns over development within 400m of Strensall Common; 400m distance is not justified with evidence and can be mitigated; If site allocations ST35 and H59 are deleted, the obligations under the Habitats Regulations in relation to such development are not arguably engaged by the Plan and therefore would be positively unlawful for policy to be adopted by way of a main modification (and to do so would render the plan as a whole unlawful).</p> <p>Alternative proposed: An exclusion zone, such as that proposed in GI2a and all other modifications that refer to this proposed new policy (including PMM9; PMM10; PMM67 and PMM68) should be rejected.</p>
345	Avison Young obo DIO ST35	not sound	<p>Agree that existing residential development on QEB (within ST35) is accepted by CYC so that some re-provision could therefore occur [EX/CYC/117a - para 8.9]. However, this is not taken into consideration by evidence or attempt to quantify numbers to discount in terms of recreational impacts; therefore evidence is flawed. Approx. 345-455 net additional homes could be delivered on site; not dissimilar to LP submission [CD001]. Resultant calculated increase in recreational pressure by DIO is comparable to combined other strategic site uplift accept by Natural Eng land. Coupled with the mitigation measures, which are considered to be disproportionately greater than that required by other housing allocations, it is not necessary to delete the proposed housing allocations ST35/H59.</p>
345	Avison Young obo DIO	not sound	<p>Object to statement in supporting text para 9.8g that "a net increase in residential uses may be acceptable". If this policy is accepted by the Inspectors, then there should be an explicit reference in this policy to the effect that there will be an amount of housing within the 400 metre buffer within QEB when the base closes as a trade-off of existing residential occupation for new homes and the part of QEB outside of 400 metres should be allocated for housing purposes.</p> <p>Alternative proposed: If GI2a accepted, an explicit reference in the policy that there will be an amount of housing within the 400 metre buffer within QEB when the base closes as a trade-off of existing residential occupation for new homes and the part of QEB outside of 400 metres should be allocated for housing purposes.</p>

345	Avison Young obo DIO	not sound	Factual error: paragraph 9.8g within the explanation to Policy GI2A. This should state “QEB in Strensall, currently occupied by the British Army...” and not “the Defence Infrastructure Organisation.” Alternative proposed: Amend error in paragraph 9.8g to state “QEB in Strensall, currently occupied by the British Army...” and not “the Defence Infrastructure Organisation.”
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
383	Natural England	sound	Recommend that a Supplementary Planning Document (SPD) is prepared to provide detailed guidance on how policies or proposals will be implemented and will link with policies G12a and G16. Provided example of Suitable Accessible Natural Green Space (SANGS) delivered as mitigation to inform SPD. Should also include financial contributions, principals in NPPF for GI and guidance on BNG within the SPD.
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	Part b)i) restricts development occupation until the whole greenspace is provided. This needs to be amended Alternative proposed: “to secure access to areas of suitable natural greenspace secured by way of phased or whole of the mitigation to any occupation...”
886	York Labour Party	sound	
891	Johnson Mowat obo Redrow Homes ST8	not sound	Part b)i) restricts development occupation until the whole greenspace is provided. This needs to be amended Alternative proposed: “to secure access to areas of suitable natural greenspace secured by way of phased or whole of the mitigation to any occupation...”

MM9.7

No representation received

MM9.8 Policy GI5: Protection of Open Space and Playing Fields

3 representations – not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
332	York Environment Forum	not sound	Oppose the whole modification as it weakens the protection of green spaces and removes reference to environmental importance.
365	Rachael Maskell MP	not sound	strongly support York Labour Party comments on this matter. As the density of the urban core increases it is absolutely vital that the strongest possible protections are in place for green spaces in built up areas.
886	York Labour Party	not sound	Oppose the whole modification as it weakens the protection of green spaces and removes reference to environmental importance.

MM9.9.
No representation received

MM9.10 Policy GI6: New Open Space provision			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
250	M J Harrison	not sound	Referring to SS11 (ST9), concerned by watering down of provision of open space, including the extension of Haxby and Wigginton Cemetery.
972	O'Neills	not sound	Cumulative impact of policies MM15.1, MM6.10, MM9.10, MM12.1, MM11.4, MM11.8, MM9.6, MM5.17, MM5.21 is unduly onerous and viability has not been properly considered.

MM9.11 – 9.12
No representation received

Section 10: Green Belt

MM10.1 Policy GB1: Development in the Green Belt			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
969	Rapleys obo Caravan and Motorhome Club	not sound	<p>Recognise that rewording reflects NPPF. Concerned that no direct reference made to tourist accommodation as acceptable form of development within the GB. Consider that campsite and motorhome site constitute outdoor recreation and should be specifically referred to in policy</p> <p>Alternative proposed: Reword GB1 to include specific reference to tourist accommodation particularly extensions, and development of, existing sites</p>
1023	Siobhan Gilfillan	not sound	Objects on the following grounds: land preserves the setting and special character of York; offers views of the Minster, historic city and Bootham Conservation Area.
1042	Colin Fletcher	not sound	Re PMM 18 St Peter's School sprawl. The recommendation was unsound and will permit sprawl. The reasons given were that it would enable a larger footprint and that the hard surface small sports pitch was already a development. But because of flood risk new building could only spread along the highest part and join up North Parade with Westmister Avenue removing the view from the river of both the historic School and York Minster The Riverside path will also lose that amenity. The path is The Trans Pennine Route 65 , used by many everyday .The other reason given would make a garden with a patio and pergola a developed site,

MM10.2
No representation received

MM10.3 Policy GB1 Explanation – new paragraph
1 representation – not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
972	O'Neills	not sound	Modification is contradictory and refers to importance of gaps in frontages and then desirability of consolidating groups of houses. Mod seeks to interpret what is meant by infill however NPPF states that this should be determined on merits of case. Proposed alternative: Delete mod

MM10.4 Policy GB2: Development in Settlements within the Green Belt			
3 representations – 1 sound / 2 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
60	MH Planning obo York Travellers Trust	not sound	Provision to meet the assessed need for the first 5 years of the plan period through Policy H5(b) on Strategic Sites will be delivered in the form of 'affordable housing provision' on existing Council Traveller sites. Policy GB4 should therefore be expanded to include gypsy and traveller provision
982	York Travellers Trust	not sound	Provision to meet the assessed need for the first 5 years of the plan period through Policy H5(b) on Strategic Sites will be delivered in the form of 'affordable housing provision' on existing Council Traveller sites. Policy GB4 should therefore be expanded to include gypsy and traveller provision
1001	Richard Bramley	sound	Landowners should be encouraged to promote small housing sites on village edges for keyworkers ,and to support local businesses.

MM10.5 – 10.6
No representation received

MM10.7 Policy GB4
2 representations – not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
60	MH Planning obo York Travellers Trust	not sound	Provision to meet the assessed need for the first 5 years of the plan period through Policy H5(b) on Strategic Sites will be delivered in the form of 'affordable housing provision' on existing Council Traveller sites. Policy GB4 should therefore be expanded to include gypsy and traveller provision
982	York Travellers Trust	not sound	Provision to meet the assessed need for the first 5 years of the plan period through Policy H5(b) on Strategic Sites will be delivered in the form of 'affordable housing provision' on existing Council Traveller sites. Policy GB4 should therefore be expanded to include gypsy and traveller provision

Section 11: Climate Change

MM11.1 Policy CC1: Renewable and Low Carbon Energy Generation Storage			
5 representations – 1 sound / 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Policies do not alone fulfil the aspirations of the York Climate Change Strategy. The modification should link to other parts of the Plan</p> <p>Alternative proposed: Recommend that the modification in Para 11.1 be revised to link to the other parts of the Local Plan needed to deliver the Strategy, including Sections 9 (for sequestration), 13, 14 and Policies C1, DP2 and SS1 (for their impacts on travel).</p>
255	HBF	sound	Deletion of the reduction in carbon emissions of at least 28% is appropriate as this is dealt with in policy CC2
332	York Environment Forum	not sound	<p>Replacement reference to York Climate Change Strategy must be a major modification and modifications do not support revised para 11.1</p> <p>Policies CC1-3 still only deal with renewable energy, new domestic & non-domestic buildings, & district heating. No references to existing building stock or carbon sequestration methods. A new overarching policy should link to Government and CYC targets with links to other parts of the plan.</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter

886	York Labour Party	not sound	Replacement reference to York Climate Change Strategy must be a major modification and modifications do not support revised para 11.1 Policies CC1-3 still only deal with renewable energy, new domestic & non-domestic buildings, & district heating. No references to existing building stock or carbon sequestration methods. A new overarching policy should link to Government and CYC targets with links to other parts of the plan.
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MM11.2 Policy CC1: Renewable and Low Carbon Energy Generation Storage			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Objects to the removal of paragraphs 11.19 to 11.21, which is incompatible with the Council's target of retrofitting 32,700 dwellings by 2030, providing no basis for planning officers to support, or require, energy efficiency improvements in existing buildings. Alternative proposed: Reinstate paras 11.19-11.20. Recommend new policy CC4 to support planning conditions for home and non-domestic building owners to increase the energy efficiency of their properties.

MM11.3 Policy CC1 explanation – paragraph 11.8 – 11.11			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	In order to compliment City of York Council’s Renewable Energy Study (2014) – ref SD117, which identifies a number of suitable wind locations in York - we recommend reinstating the use of the word ‘wind’ as a possible renewable energy source. Alternative proposed: Reinstate the use of the word ‘wind’ as a possible renewable energy source.

332	York Environment Forum	not sound	Reinstate 'wind' in para 11.4 as a possible renewable energy source using SD117 as a basis for suitable locations
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	Reinstate 'wind' in para 11.4 as a possible renewable energy source using SD117 as a basis for suitable locations
1009	Kate Hignett	not sound	Document refers to NPPF 2012- should take the revised and updated NPPF 2021 into account

MM11.4
No representation received

MM11.5 Policy CC2: Sustainable Design and Construction of New Development			
4 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
255	HBF	not sound	This policy is not necessary and should be deleted. The Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	Suggest the final modification which starts "Pending anticipated changes...." Is removed as the following paragraph recognises such changes are brought about through Government Building Regulation changes outside Planning Policy. As drafted, the MM adds nothing and may confuse.
891	Johnson Mowat obo Redrow Homes ST8	not sound	Suggest the final modification which starts "Pending anticipated changes...." Is removed as the following paragraph recognises such changes are brought about through Government Building Regulation changes outside Planning Policy. As drafted, the MM adds nothing and may confuse.
972	O'Neills	not sound	Wording of policy should be more closely aligned with BR. Wording used should also align with BR to avoid confusion

			Alternative proposed: Criteria (i) Reference to Part L 2013 should be removed and replaced with text requiring compliance with Part L 2021. Reference to achieving 75% over Part L 2013 should be removed as it imposes a requirement to demonstrate feasibility/ viability which is overly onerous
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MM11.6 Policy CC2: Sustainable Design and Construction of New Development			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
972	O'Neills	not sound	<p>Wording of policy should be more closely aligned with BR. Wording used should also align with BR to avoid confusion</p> <p>Alternative proposed: Criteria (i) – Once again, this policy wording should be removed and replaced with text requiring compliance with Part L 2021 and any subsequent updates. A 28% reduction on Part L 2013 unless it is not feasible or viable will cause confusions with the implementation of 2021 BR.</p>

MM11.7 Policy CC2: Sustainable Design and Construction of New Development			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	It is disproportionate to require all COU aps to achieve BREEAM excellent. BREEAM mostly overtaken by building regs. Needs threshold of 100sqm aligned with BREEAM threshold for conversions and LB.

MM11.8 Policy CC2: Sustainable Design and Construction of New Development			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment

585	Johnson Mowat obo Taylor Wimpey ST7	not sound	Object to the need for Strategic Sites to deliver a BREEAM Communities assessment. On the basis of following Part L changes, there is no case to switch to considering another regime under BREEAM.
891	Johnson Mowat obo Redrow Homes ST8	not sound	Object to the need for Strategic Sites to deliver a BREEAM Communities assessment. On the basis of following Part L changes, there is no case to switch to considering another regime under BREEAM.

MM11.9
No representation received

MM11.10 Policy CC2 Explanation			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	Requirement for Energy Statement to be completed by a suitable qualified individual is overly onerous. BRegs now require higher targets so development will deliver policy requirements without needing a statement to that effect.

MM11.11 Policy CC2 Explanation			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	requests the removal of para 11b % targets as these have yet to be confirmed by Government in the Part L Future HHomes Revisions standards.
891	Johnson Mowat obo Redrow Homes ST8	not sound	requests the removal of para 11b % targets as these have yet to be confirmed by Government in the Part L Future HHomes Revisions standards.
972	O'Neills	not sound	Wording of policy should be more closely aligned with BR. Wording used should also align with BR to avoid confusion

Alternative proposed: Text should be revised to reflect changes to policy wording.

MM11.12 Policy CC2 explanation – paragraph 11.18 – 11.23			
3 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
332	York Environment Forum	not sound	<p>The deleted paras remove the commitment that the Council “will support home owners in delivering (energy) efficiency improvements”. This is wholly incompatible with the Council’s target of retrofitting 32,700 dwellings by 2030 and its now adopted climate change strategy</p> <p>During Phase 4 the Council stated that the references in Paras 11.19 and 11.20 would be reinstated, but this has not happened.</p> <p>Alternative proposed: We recommend that a new Policy CC4 is added which sets out clearly the planning conditions which will apply to support home owners, and owners of non-domestic buildings, to increase the energy efficiency of their properties.</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	<p>The deleted paras remove the commitment that the Council “will support home owners in delivering (energy) efficiency improvements”. This is wholly incompatible with the Council’s target of retrofitting 32,700 dwellings by 2030 and its now adopted climate change strategy</p> <p>During Phase 4 the Council stated that the references in Paras 11.19 and 11.20 would be reinstated, but this has not happened.</p>

MM11.13 Policy CC3: District Heating and Combined Heat and Power Networks			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
972	O'Neills	not sound	The threshold is too low for evaluating feasibility and viability of new decentralised energy network. If aim is that new development have necessary infrastructure to connect in

		future then the feasibility of this should be considered. Practicalities of policy need more consideration and consultation.
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MM11.14 Policy CC3 explanation – paragraph 11.28 – 11.34			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
972	O'Neills	not sound	The threshold is too low for evaluating feasibility and viability of new decentralised energy network. If aim is that new development have necessary infrastructure to connect in future then the feasibility of this should be considered. Practicalities of policy need more consideration and consultation.

Section 12: Environment Quality and Flood Risk

MM12.1 Policy ENV1: Air Quality			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Policy lacks clarity: does not require measures to be in place to mitigate and prevent further exposure; fails to say anything about existing residents similarly affected and is therefore noncompliant with NPPF 2012 para 124; does not define what is unacceptable.</p> <p>Alternative proposed: Further modification required to:</p> <ul style="list-style-type: none"> - mitigate and prevent further exposure - reference existing residents similarly affected; - provide a definition of acceptable/unacceptable air quality.
332	York Environment Forum	not sound	<p>unlike the previous version, it does not require measures to be in place to mitigate and prevent further exposure and does not deal with existing residents. The policy lacks clarity for both applicants and those potentially negatively affected, and overall the policy is even weaker than the previous version.</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	<p>Unlike the previous version, it does not require measures to be in place to mitigate and prevent further exposure and does not deal with existing residents. The policy lacks clarity for both applicants and those potentially negatively affected, and overall the policy is even weaker than the previous version.</p>
972	O'Neills	not sound	<p>Requirement for all major aps to submit air quality assessment is overly onerous.</p> <p>Alternative proposed: Detailed air quality assessment to be required for planning application that have potential to generate significant air impacts.</p>

MM12.2 Policy ENV1 Explanation			
6 representations – not sound			

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Objects to the deletion of text at paras 12.6 and 12.7, including the removal of requirement for SPD which was seen as a core means of implementing the Council's Low Emission Strategy (SD093). Alternative proposed: Reinstate deleted text at paras 12.6 and 12.7, including requirement for SPD.
103	York Civic Trust	not sound	Noting the removal of a range of SPDs from the Local Plan outside of the Planning Inspectors' inquiries and the statutory consultation. Alternative proposed: Recommends the Council provide a SPD publication programme for all relevant Policies.
332	York Environment Forum	not sound	We note a similar weakening in the supporting text of 12.6 and 12.7 on the issues we flag in MM12.1. also object to deletion of the SPD reference
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	We note a similar weakening in the supporting text of 12.6 and 12.7 on the issues we flag in MM12.1. also object to deletion of the SPD reference
1009	Kate Hignett	not sound	There is no mention of the Climate Change policy approved by the Council in December 2022 which has a direct bearing (as existing Council policy) on the contents of this section (and others). Alternative proposed: Ref council's Climate Change policy in Section 12.

MM12.3 Policy ENV2: Managing Environmental Quality			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	Not consistent with para 123 NPPF. Higher test has been set in mods and is inconsistent with NPPF

			Alternative proposed: Development will be permitted where it does not cause significant adverse impacts to the amenities of existing and future.
972	O'Neills	not sound	Wording amendments require all development resulting in adverse environmental impacts (significant or not) to demonstrate how these issues have been considered. This is overly onerous, particularly where impact are small.

MM12.4
No representation received

MM12.5 Policy ENV4: Flood Risk			
2 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	Mod asks for an acceptable FRA in areas of flood risk. No definition of acceptable; should comply with PPG.
997	Rosamond Hanney	not sound	I feel the environment would suffer as a result of the changes proposed. The flood risk increases year on year with global warming. If the proposed changes go ahead then how will water escape to its natural route? Children should be using the Park & Ride Scheme be dropped off at school thus saving further damage to the flood plains next to the school.

Section 14: Transport and Communication

MM14.1 Section 14 Introduction – paragraphs 14.2- 14.3			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>Supports the references to Local Transport Strategy and fourth Local Transport Plan, but objects to the continued reference to LTP3 which is now seriously out of date. Basing future development decisions on an outdated Local Transport Plan makes it unsound.</p> <p>Alternative proposed: References to LTP3 should be modified so that it is clear that interpretation of these policies will in the future be determined by LTP4.</p>
332	York Environment Forum	not sound	<p>Welcome references to 4th Local Transport Plan but the Council has failed to evaluate a strategy for addressing and mitigating the major overall traffic, congestion, air quality and carbon emission consequences of the plan growth in line with the requirements of NPPF12, the DfT's 2015 guidance, or of the Council's now adopted Climate Change Strategy</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
404	York Bus Forum	not sound	<p>The modification does not indicate how the Council will address the major overall traffic congestion, air quality and carbon emission effects of its growth proposals. It is therefore inconsistent with the requirements of NPPF2012, the DfT's 2015 guidance, or the Council's own now adopted Climate Change Strategy. We ask that the Council completes the DfT's 2015 guidance process to identify the necessary mitigations, taking into account Climate Change, and updates to its transport policies as appropriate. We recommend an urgent update of the plan once LTP4 for York is adopted.</p>
886	York Labour Party	not sound	<p>Welcome references to 4th Local Transport Plan but the Council has failed to evaluate a strategy for addressing and mitigating the major overall traffic, congestion, air quality and carbon emission consequences of the plan growth in line with the requirements of NPPF12, the DfT's 2015 guidance, or of the Council's now adopted Climate Change Strategy</p>

MM14.2 Policy T1: Sustainable Access			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	Recommends removal of ambiguous language, such as 'reasonably' or 'not reasonably', which is open to a range of interpretations. Recommends tightening language to omit all such qualifiers.

MM14.3 Policy T1 explanation – paragraph 14.4			
4 representations – 3 not sound / 1 n/a			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>The proposed modifications remove detailed specifications of standards in a forthcoming SPD, and specific standards for access to public transport or service frequency. No date is given for the SPD's publication. This makes the Plan unsound, providing opportunity for development prior to any SPD to create new communities with inadequate public transport, under-provision of cycle parking and over-provision of car parking.</p> <p>Alternative proposed: Further modification to para 14.14a to specify that, prior to publication of the SPD, standards will be those specified in the 2005 Development Control Local Plan.</p>
332	York Environment Forum		<p>All references in paras 14.8, 9, 12 and 13 to detailed specifications of standards in a forthcoming SPD have been deleted and replaced by a much vaguer statement in the new para 14.14a</p> <p>We recommend, therefore, that para 14.14a is modified to specify that, prior to publication of the SPD, standards will be those specified in the 2005 Development Control Local Plan.</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter

886	York Labour Party	not sound	All references in paras 14.8, 9, 12 and 13 to detailed specifications of standards in a forthcoming SPD have been deleted and replaced by a much vaguer statement in the new para 14.14a We recommend, therefore, that para 14.14a is modified to specify that, prior to publication of the SPD, standards will be those specified in the 2005 Development Control Local Plan.
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MM14.4 Policy T2: Strategic Public Transport Improvements			
5 representations – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	This modification removes the detailed list of public transport improvements, and thus leaves them subject to disruption by development prior to their inclusion in the IDP. Alternative proposed: Reinstate the detailed list of public transport schemes in Policy T2 to ensure that they are protected from development. Reinstate reference to the need to provide dedicated bus services to other major developments, including ST5, ST7, ST8 and ST9.
332	York Environment Forum	not sound	We recommend a detailed list of schemes is reinstated in Policy T2, to ensure that they are protected from development in line with NPPF12 Para 41
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
404	York Bus Forum	not sound	Detailed list of public transport infrastructure improvements removed, hence leaving them to liaise to be modified or lost by development prior to their inclusion in the IDP. Alternative proposed: We recommend that a detailed list of schemes is reinstated in Policy T2, to ensure that they are protected from development in line with NPPF2012 para 41.
886	York Labour Party	not sound	We recommend a detailed list of schemes is reinstated in Policy T2, to ensure that they are protected from development in line with NPPF12 Para 41

MM14.5 Policy T2 Explanation – paragraphs 14.15 to 14.23			
1 representation – not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
404	York Bus Forum	not sound	<p>The proposals for developing and extending the park and ride network are essential for serving the growing city and the planned developments.</p> <p>Alternative proposed: We recommend that the proposals for developing and extending the park and ride network are reinstated.</p>

MM14.6			
No representations			

MM14.7 Policy T4: Strategic Highway Network Capacity Improvements			
4 representations – 4 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>This modification includes a grade-separated junction of the A64 and dualling the A1237 west, for which no case has been made in the Plan's lifetime. No reference is made to the requirements for managing the existing road network to achieve the 20% reduction in car use required by the Council's climate strategy (CYC/EX/104). This makes the Plan unsound in that, in the absence of effective traffic management, such highway investments will add to private vehicle traffic, adversely affect sustainable travel, and thus be counter to the Plan's objectives and the requirements of NPPF12. This is demonstrated by the assessment of the dualling of the A1237 north, which shows a 90% increase in traffic on it, but at most a 7% reduction in inner York.</p>

			Alternative proposed: Delete references to the grade-separated junction with the A64 and dualling of the western outer ring road. Expand policy to emphasise the role of effective traffic management on the existing highway network.
332	York Environment Forum	not sound	This modification includes a grade-separated junction of the A64 and dualling the A1237 west, for which no case has been made in the Plan's lifetime. No reference is made to the requirements for managing the existing road network to achieve the 20% reduction in car use required by the Council's draft climate strategy. The references to the grade-separated junction with the A64 and dualling of the western outer ring road should be deleted, and the Policy expanded to emphasise the role of effective traffic management on the existing highway network.
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	This modification includes a grade-separated junction of the A64 and dualling the A1237 west, for which no case has been made in the Plan's lifetime. No reference is made to the requirements for managing the existing road network to achieve the 20% reduction in car use required by the Council's draft climate strategy. The references to the grade-separated junction with the A64 and dualling of the western outer ring road should be deleted, and the Policy expanded to emphasise the role of effective traffic management on the existing highway network.

MM14.8 Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements			
6 representations – 1 sound / 5 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	The detailed list of schemes has been deleted and replaced by three much less specific statements, leaving specific schemes vulnerable to inappropriate development. The reference to the Council developing "a comprehensive network ..." "through York's LCWIP, which is currently being researched" is misleading. In practice the LCWIP is to be based on ten strategic cycling corridors and four key walking zones, and will thus not provide a comprehensive network. It is essential that the Council produces an updated comprehensive network if it is to deliver the doubling of active travel trips required by 2030 for the Climate Change Strategy (EX/CYC/104).

			<p>Alternative proposed: Reinstate the detailed list of public transport schemes in Policy T5 to ensure that they are protected from development.</p> <p>Modify the reference to the LCWIP in para 14.40 to read: "... which will be developed in part through York's LCWIP and in more detail in LTP4, and will be fully reflected in an updated IDP".</p>
332	York Environment Forum	not sound	<p>The detailed list of schemes should be reinstated in Policy T5, to ensure that they are protected from development</p> <p>Alternative proposed: We recommend that the reference to the LCWIP in para 14.40 is modified to read: "... which will be developed through York's LCWIP and LTP4, and will be fully reflected in an updated IDP. The cycling network in the 2005 Local Plan will be used pro-tem."</p>
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
886	York Labour Party	not sound	<p>The detailed list of schemes should be reinstated in Policy T5, to ensure that they are protected from development</p> <p>Alternative proposed: We recommend that the reference to the LCWIP in para 14.40 is modified to read: "... which will be developed through York's LCWIP and LTP4, and will be fully reflected in an updated IDP. The cycling network in the 2005 Local Plan will be used pro-tem."</p>
970	Kathryn Jukes obo various	not sound	<p>In this context the use of 'where appropriate' is not compliant with NPPF.</p> <p>Alternative proposed: The Council will enable and require development to contribute to the following, where considered necessary, and the requirement is directly and reasonably related to the development</p>
985	Daniel Nicholson	sound	The dedicated LCWIP for York is a good step forward in improving the city's cycling and walking infrastructure. This plan is absolutely necessary to reduce car traffic in the city, reducing overall commute times and to improve air quality. The modification to include the LCWIP in the new Local Plan is welcome, although it is important that the specific schemes mentioned in the previous version of the plan are still implemented, along with what is already included in the LCWIP.

MM14.9 Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities			
5 representations – 5 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>We are concerned by the omission of the following three justifications for not accepting development near to public transport facilities.</p> <p>Omission of the first of these would explicitly permit high traffic generating developments which could prejudice the operation of the public transport facility. The other two should be standard conditions for rejecting development.</p> <p>Alternative proposed: Reinstate the three justifications for development, namely:</p> <ul style="list-style-type: none"> • generate a demand for travel by private motorised vehicles that is likely to be unsustainable either in the location of the development or on the wider highway network; or • have an adverse impact on the character, historic and natural environment and amenity of the area in the vicinity of the development, or • compromise the purpose of the Green Belt.
332	York Environment Forum	not sound	The three deleted bullet points should be reinstated
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
404	York Bus Forum	not sound	No justification has been provided for removing the last three provisos for supporting developments close to existing or proposed public transport facilities. In particular, the removal of the first of these would allow high traffic generating developments which could prejudice the operation of the public transport facility. There is also no justification provided for removing the phrase "reuse of disused public transport corridors or facilities" in the proposals for preventing the loss or reuse of public transport corridors or facilities.
886	York Labour Party	not sound	The three deleted bullet points should be reinstated

MM14.10 Policy T7 Explanation – paragraph 14.49			
1 representation – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment

103	York Civic Trust	not sound	<p>Noting the removal of a range of SPDs from the Local Plan outside of the Planning Inspectors' inquiries and the statutory consultation.</p> <p>Alternative proposed: Recommends the Council provide a SPD publication programme for all relevant Policies.</p>
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MM14.11 Policy T8: Demand Management			
7 representations – 7 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>No reference is given for the Council's guidance on parking standards. Revised standards are to be included in the Sustainable Transport SPD, but no date is given for this. This is unsound, and risks over-provision of parking. The Policy requires developments to "incorporate appropriate demand management measures", but the modifications are inadequate in their coverage of the types of measure.</p> <p>Alternative proposed: Policy T8 is modified to specify that, prior to publication of the SPD, parking standards will be those specified in the 2005 Development Control Local Plan.</p> <p>Further modification to T8 proposed:</p> <ul style="list-style-type: none"> - Support for working, studying and shopping from home (linked to Policy C1); - Design of new communities to reduce the need to travel (linked to Policies DP2 and SS1); - Personal, workplace and school travel plans; - Road network management (linked to Policy T4); - Parking charges to influence car use; and - Workplace parking levies and road pricing.
103	York Civic Trust	not sound	<p>Noting the removal of a range of SPDs from the Local Plan outside of the Planning Inspectors' inquiries and the statutory consultation.</p> <p>Alternative proposed: Recommends the Council provide a SPD publication programme for all relevant Policies.</p>

332	York Environment Forum	not sound	Policy T8 should be modified to specify that, prior to publication of the SPD, parking standards will be those specified in the 2005 Development Control Local Plan. Appropriate demand management measures should be specified in the policy
365	Rachael Maskell MP	not sound	I support York Labour Party points on this matter
404	York Bus Forum	not sound	<p>Policy T8: Demand Management - the analysis provided in CYC/87a and CYC/91 does not satisfy the requirements of NPPF2012 or DfT (2015) and is therefore unsound.</p> <p>Alternative proposed: A thorough analysis of the impacts, on all indicators, of the set of proposed strategic developments should be provided. Policies T1 to T9 should then be revised to reflect the resulting requirements. A commitment should be given for the analysis to be conducted in preparation for LTP4, and reflected in an early revision to the Plan.</p>
886	York Labour Party	not sound	<p>Policy T8 should be modified to specify that, prior to publication of the SPD, parking standards will be those specified in the 2005 Development Control Local Plan. Appropriate demand management measures should be specified in the policy</p> <p>Alternative proposed: The following should be added:</p> <ul style="list-style-type: none"> - support for working, studying and shopping from home - Design of new communities reducing the need to travel - Personal, workplace and school travel plans - Road network management - Other charging mechanisms
972	O'Neills	not sound	<p>Requires that development should comply with Council's latest parking standards however CYC has no up to date parking standards.</p> <p>Alternative proposed: Remove reference to Council's latest parking standards.</p>

MM14.12

No representation received

Section 15: Delivery and Monitoring

MM15.1 Policy DM1: Infrastructure and Developer Contributions			
8 representations – 8 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
75	Heslington Parish Council	not sound	<p>p.100 (v) We support this enhanced protection. It is important that infrastructure is taken account of when planning, particularly transport infrastructure e.g. ST15 to A64 which will impact green belt, veteran native woodland and introduce light, noise and emissions pollution. For each bullet point (i) to (v) we suggest the phrase “and its associated infrastructure” is added after “development”. This would clarify that the impact of the infrastructure on biodiversity may be as great, if not greater than, the development itself and ensure that infrastructure mitigation is not overlooked or down-graded to a secondary consideration.</p> <p>Alternative proposed: P.100: For each bullet point (i) to (v) we suggest the phrase “and its associated infrastructure” is added after “development”</p>
255	HBF	not sound	<p>Not appropriate to state that developers need to demonstrate that there are exceptional circumstances to justify the need for a viability assessment. The approach is inconsistent with the PPG and NPPF which refer to particular circumstances. that the use of overage clauses or viability reviews can be useful but the proposed addition to this policy provides very little detail as to how this would take place in York</p> <p>Alternative proposal: In line with the PPG, the Plan should set out circumstances where review mechanisms may be appropriate as well as a clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development.</p>
585	Johnson Mowat obo Taylor Wimpey ST7	not sound	<p>Object to the revised wording. If a scheme is agreed to be unviable, simply re-phasing payments is unlikely to make much of a difference.</p> <p>Alternative proposed: “Where a scheme is demonstrably unviable, the Council will work with the developer to modify the scale of contributions as well as consider re-phasing of obligation payments.”</p>

891	Johnson Mowat obo Redrow Homes ST8	not sound	<p>Object to the revised wording. If a scheme is agreed to be unviable, simply re-phasing payments is unlikely to make much of a difference.</p> <p>Alternative proposed: “Where a scheme is demonstrably unviable, the Council will work with the developer to modify the scale of contributions as well as consider re-phasing of obligation payments.”</p>
970	Kathryn Jukes obo various	not sound	<p>Suggestion that developers can only submit a viability assessment in exceptional circumstances is too onerous and not consistent with national guidance. PPG suggest applications needs to demonstrate particular circumstances to justify the need for a viability assessment.</p> <p>Alternative proposed: Suggests word 'exceptional' is replaced with 'particular'</p>
972	O'Neills	not sound	<p>Supporting text should explicitly note that S106 payments are subject to viability to ensure consistency with national policy. Cumulative impact of LP policies is unduly onerous and likely to render development undeliverable. Viability has not been considered with regards to cumulative impact</p>
980	TPB obo McCarthy Stone	not sound	<p>Review mechanism is not justified; detail should be in plan not SPD</p> <p>Alternative proposed: Reference to review mechanism should be removed.</p>
993	Ziyad Thomas (Planning Issues Ltd obo Churchill Retirement Living Ltd)	not sound	<p>Although policy DM1 states that where developers demonstrate that there are exceptional circumstances which justify the need for a viability assessment, which will be considered by the Council and consideration will be given to modifying the phasing of obligations & may include a review mechanism, policy H10 (Affordable Housing) does not make any reference to the review mechanism. No historic consultation on a review mechanism during the public consultation process or the associate evidence base. The inclusion of a review mechanism has not been historically justified or consulted upon and appears to be a very late addition to the Local Plan. No indication of process, terms of engagement or when viability will be assessed over the lifetime of the development. Proposed addition is contrary to the guidance in PPG, which states: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits</p>

through economic cycles.' The objector also included an extract from Planning Appeal APP/K3605/W/20/3261529 at Oatlands Drive, Weybridge, to support their objection.

MM15.2

No representation received

MM15.3 Policy DM1 explanation – paragraph 15.15 and Table 15.1

4 representations – 4 not sound

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
103	York Civic Trust	not sound	<p>This modification is based on analysis in EX/CYC/87a. No reference is made to EX/CYC/91, which assesses the impact of development on carbon and local air pollutant emissions from transport. The analysis in these support documents is unsound, as is the modification in para 15.15. NPPF 2012 specifies that the impact of the anticipated development, however it is distributed, should be compared with the situation without such development. DfT (2015) states that Local Plan transport assessments should ensure that “any proposed land allocation impact is considered in the context of two alternative scenarios – ‘with development’ and ‘without development’” and thus “enable a comparative analysis of the transport effects of the proposed allocation.” The Council has failed to make this comparison in CYC/87a and CYC/91.</p> <p>Alternative proposed: Further modification to para 15.15 to acknowledge these limitations, and to make clear that they will be remedied in LTP4.</p>
332	York Environment Forum	not sound	<p>Para 15.15 should be further modified to acknowledge the limitations of the evidence upon which it is based, and to make clear that they will be remedied as per our recommendations on MM14.1.</p>
365	Rachael Maskell MP	not sound	<p>I support York Labour Party points on this matter</p>

886	York Labour Party	not sound	Para 15.15 should be further modified to acknowledge the limitations of the evidence upon which it is based, and to make clear that they will be remedied as per our recommendations on MM14.1.
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MM15.4 Policy DM1 explanation – paragraph 15.21			
1 representations – 1 not sound			
MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
970	Kathryn Jukes obo various	not sound	No provision in legislation to support the mod seeking second change to seek planning obligations after permission granted. Policy mod does not match legislation which allow for flexibility for policy compliance to be achieved over time. No time frame indicated in mod. Should be further mod to allow for the caveat to work in opposite direction, ie if the development generates lower profit than expected.

Proposed Map Modifications

MM ID ref	Respondent Name	Modification reference	Modification sound/not sound	Summary of comment
PMM1 ST15				
5 representations – 2 sound / 3 not sound				
102	Elvington Parish Council	PMM1 - ST15 (Policies Map South) link	not sound	Objecting to ST15: - proximity to Elvington - loss of historical runway - impact of increased car traffic - Site could be moved closer to the ring road to avoid loss of historic runway.
378	Quod obo Langwith Development Partnership Ltd	PMM1 - ST15 (Policies Map South) link	sound	Support modification for ST15
378	Quod obo Langwith Development Partnership Ltd	PMM1 - ST15 (Policies Map South) link	sound	Support modification for OS10
381	Yorkshire Wildlife Trust	PMM1 - ST15 (Policies Map South) link	not sound	Still concerned that ST15 configuration would have unacceptable impacts on Elvington Airfield SINC important for breeding skylark and likely, birds associated with Lower Derwent Valley SPA. Support western end of the runway becoming ecological mitigation area but does not address outstanding concerns re fragmentation of the SINC. Concerns re effectiveness of mitigation in close proximity to large residential development. Consider allocation contradicts policy GI2 and SS13. Allocation does not respond positively to the wider environment or sufficiently consider subsequent environmental impacts, which leave doubts regarding the 'soundness' of the local plan

996	Anne Longmore	PMM1 - ST15 (Policies Map South) link	not sound	In previous documentation site referred to as west of Elvington Lane which is accurate as a large part of site is west of Elvington Lane. However the map the council and developers have used is not accurate as the proposed access point is unto York road which has an Elvington postcode. All of Elvington Lane has a Dunnington postcode. It would therefore be more accurate to state access unto B1228. Yellow mark on attached photo indicates where York rd and Elvington Lane meet.
PMM2 ST16 no representations received				
PMM3 ST32 no representations received				
PMM4 ST35 1 representation – not sound				
345	Avison Young obo DIO	PMM4 - ST35 (Policies Map North) link	not sound	Object to the deletion of ST35. Should be reinstated and shown as per submitted plan Alternative proposed: No modification required; revert to submitted plan.
PMM5 H22 no representations received				
PMM5 H23 no representations received				
PMM7 H56 1 representation – not sound				
659	Chris Wedgewood	PMM7 - H56 (Policies Map North) link	sound	Plan accurately shows greenspace.
PMM8 H59 3 representations – not sound				
345	Avison Young obo DIO	PMM8 - H59 (Policies Map North) link	not sound	Object to the deletion of ST59. Should be reinstated and shown as per submitted plan

				Alternative proposed: No modification required; revert to submitted plan.
345	Avison Young obo DIO	PMM8 - H59 (Policies Map North) link	not sound	Green Belt boundary in this location is inconsistent with national policy; it does not serve GB purposes. The submission plan was more in alignment; modification not justified. DIO note that there is no strong and defensible boundary between Ox Carr Lane and the residential properties on Cumbrian Avenue (map provided). Alternative proposed: No modification required; revert to submitted plan.
1028	Eleanor Hindley	PMM8 - H59 (Policies Map North) link	not sound	Last year, the City of York Council committed the city to become carbon neutral by the end of 2030. Reclassifying the greenbelt and leaving it open to development and an increase in traffic is inconsistent with both local and national government policy. Any development on the site increases the flood risk in an area which is prone to surface water flooding. In 2015, Water Lane was impassable following the floods. Whilst the barriers have since been improved, it would be foolhardy to unnecessarily increase the flood risk and is not sustainable in view of the climate emergency. As a historic town, the greenbelt around York is central to its character; as identified by the National Planning Policy Framework. This policy states that the open space around such cities is essential to prevent encroachment upon green spaces and prevent urban sprawl. Once the greenbelt has been removed, it won't come back and it will be to our detriment. I cannot see how this is in any way justifiable.
PMM9 Strensall Common Special Area of Conservation (SAC) 400m Buffer 1 representation – not sound				

345	Avison Young obo DIO	PMM9 - Strensall Common Special Area of Conservation (SAC) 400m Buffer (Policies Map North) link	not sound	Based on our response to MM9.6, this modification is not considered fully justified and should be deleted, the plan as submitted is sound without the need for this change. Alternative proposed: No modification required; revert to submitted plan.
PMM10 Strensall Common Special Area of Conservation (SAC) 5500m Buffer 1 representation – not sound				
345	Avison Young obo DIO	PMM10 - Strensall Common Special Area of Conservation (SAC) 5500m Buffer (Policies Map North) link	not sound	Based on our response to MM9.6, this modification is not considered fully justified and should be deleted, the plan as submitted is sound without the need for this change. Alternative proposed: No modification required; revert to submitted plan.
PMM11 Strensall 1 representation – sound				
345	Avison Young obo DIO	PMM11 - Strensall (Policies Map North) link	sound	DIO support the proposed modification to the Green Belt boundary, which now excludes the Reserve Forces and Cadets Association. Boundary is now considered consistent with national policy and fully justified.
PMM12 Windy Ridge, Huntington PMM13 Jockey Lane PMM14 Land to r/o Osbaldwick Village PMM15 Land at Hull Road, north of Grimston Bar PMM16 Acomb Water Works PMM17 Knapton Village No representations received				
PMM18 St Peter's School 27 representations – 1 sound / 25 not sound / 1 n/a				

232	Stephen Lornie	PMM18 - St. Peter's School (Policies Map North) link	not sound	Will not 'conserve and enhance the environment' or York's historic character and will encourage car travel rather than walking or cycling by the river.
365	Rachael Maskell MP	PMM18 - St. Peter's School (Policies Map North) link	not sound	I strongly oppose the modifications PMM18 and PMM50 at St Peter's School and request their removal from the plan. The reasoning for this was detailed in the City of York Council's EX/CYC/59c: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4. I am concerned that shifting the previously proposed greenbelt boundary and giving this land an 'education allocation' will pose a risk to the openness of the land, with its clear views of the Minster within a compact urban setting. The previously proposed line (PM75 EX/CYC/58 [2021]) offers a more robust boundary to the Green Belt at St Peters School with a greater degree of permanence.
883	O'Neil's obo St Peters School	PMM18 - St. Peter's School (Policies Map North) link	sound	School supports amended GB boundary which now accords with NPPF
984	Mary Eagleton	PMM18 - St. Peter's School (Policies Map North) link	not sound	Will not conserve and enhance the environment or York's historic character and will encourage car travel rather than walking or cycling by the river.

989	Chris Binns	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>This proposal is not justified nor consistent with National Policy. City of York Council Executive was at pains to maintain the Green Belt status of this land when last reviewed in 2021. It is now astonishing that they are even considering changing the categorisation of this land. National Policy states that Green Belt should preserve the setting and special character of historic towns, such as York. The green belt land in question is open space essential to York's character. Furthermore, removal of the Green Belt risks urban sprawl and encroachment on this precious open space. Finally, permitting any future development would likely contribute to increasing flood risk and increase pollution and risk to humans through increased use of cars on other vehicles in what is already an extremely busy area suffering with congestion.</p> <p>Alternative proposed: Remove PMM18</p>
992	Simon Crack	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>The reasons for this land to be included as part of the Green belt is fully and persuasively set out in the original Local Plan Document. The proposed change would clearly have a significantly detrimental effect to the environmental and ecological importance of the area.</p> <p>Alternative proposed: Remove PMM18</p>

998	Cllr Danny Myers & Cllr Margaret Wells	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>Oppose the modifications PMM18 and PMM50 at St Peters School. We agree with the detailed reasoning previously set out in the City of York Council's EX/CYC/59c: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4.</p> <p>The shifting of the boundary to allocate land to an 'education allocation' will risk the openness of the land, with its clear views of the Minster within a compact urban setting. The city's compactness within this urban setting is offset by the fields of St Peters and Queen Annes, which offer increased public amenity, as they are green, with open character and part of the river corridor; this land therefore functions as part of the 'countryside' and contributes to a countryside character through its openness and views.</p> <p>The green wedge and wider biodiversity connection to the Site of Special Scientific Interest at Rawcliffe Meadows and Clifton Ings is important environmentally as well as being of high amenity value within the inner green belt area. Further to this, views of the Minster could be impacted by an allowance of unrestricted sprawl as floodlit artificially surfaced hockey pitches would demonstrate; this would have an urbanising influence on the area.</p> <p>We oppose the modifications PMM18 and PMM50 at St Peters School, and ask that they are removed from the new Local Plan.</p> <p>Alternative proposed: Remove PMM18 and PMM50</p>
999	Francis James Branney	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>I am concerned that re-designating this land for potential development may contributing to increasing flood risk in this area. I'm also concerned that the green belt should be preserved in this area of natural beauty close the the River Ouse which is used regularly by local residents for rest and relaxation and which contributed to preserving the special character of York as an historic town.</p> <p>Alternative proposed: Remove PMM18</p>

1000	Victor Keith Stannard	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>This is not justified because it removes a vital protection that St Peter's school has long been hoping to develop for commercial gain. That is why they lobbied long and hard for this amendment with CYC AND the Inspectorate. I also believe that the Inspectors' reasoning is defective in that they assert that this is NOT an open section of land anymore, is covered in fenced enclosures and floodlights; it is NOT. They seem to be discussing it as though St Peter's proposals for this land have already been granted and carried out! To allow, via a change in Green Belt status, for 8 acres of former water meadow on a Zone 3 flood plain, to be covered in car parking, floodlights and artificial pitches would be an abomination flying in the face of all current local and national guidance re: preservation of green space in sensitive urban/ ecological areas. Changing this land to educational use from Green Belt would make this disaster much more likely. I attach some pics for your elucidation.</p> <p>Alternative proposed: Remove PMM18</p>
1000	Victor Keith Stannard	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>Changing the designation of the area around St Peter's from GB to Educational will increase the likelihood of this open space being developed. The Local Plan Inspectors claim this change will make no difference, but a review by CYC Landscape Architect refutes this comprehensively, which we are all in agreement locally. If the school is able to use this alteration to advance their plans, the results will be dreadfully detrimental and GB status therefore needs to be maintained. (LA report attached).</p> <p>Alternative proposed: Remove PMM18</p>

1002	Josephine Tomlinson	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>I consider that the St Peter's playing fields should remain as part of York's green belt. My main concerns regarding the proposed St Peter's development on currently designated green belt land relate to the following areas: increased vehicular traffic, safety, noise pollution, light pollution, air pollution, increased hard surface area and loss of the peaceful character and environmental assets of the area. The overall City of York local plan is tasked with maintaining the character of York and its green corridors. The use of the all weather pitches with bright flood lights will mean that there will be longer hours of traffic and sports and spectator noise and light pollution until late at night. This light pollution is a nuisance to human neighbours, as well as being harmful to the normal diurnal patterns for wildlife such as insects (e.g. moths), bats and birds.</p> <p>Alternative proposed: Remove PMM18</p>
1004	Michael Jones	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>Objecting to the modification which sees green fields owned by St Peter's School removed from the Green Belt. The two fields both assist in safeguarding the countryside from further encroachment and preserve the setting and special character of York. The fields act as an important green wedge, which alongside the river and the adjacent green fields create the important open character and setting for this part of the city. Important public views are afforded across these fields towards the city centre, with clear and significant views of York Minster and the listed Principal Hotel amongst others. The field also enables important open views towards Clifton and its numerous historic buildings, including churches. Removal of this land from the green belt is therefore inconsistent with national planning policies.</p> <p>Alternative proposed: Remove PMM18</p>

1005	Daniel James	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>The proposals to allow development on the green belt land by St Peter's School will have a severe impact on an incredibly special and valued part of York. I passionately believe that this green belt land is vitally important to preserving the special character of our beautiful city. St Peter's School appears to show no interest in the impact of the expansion plans on this quiet haven so close to the city centre and I fear that once development is allowed the unique character will be lost for ever, to the detriment of all local residents, and visitors who are charmed by the riverside area. If development is allowed here I fear there is a heightened risk of urban sprawl in this area. As this is an area which is prone to flooding I am most concerned that allowing development on this land may contribute to a future flooding risk. I don't believe this policy is consistent with green belt policy and is not justified.</p> <p>Alternative proposed: Remove PMM18</p>
1006	David Rowbottom	PMM18 - St. Peter's School (Policies Map North) link		<p>PMM18 is not positively prepared because it is not consistent with sustainable development. The proposal fails adequately to consider the contribution of this land to flood mitigation or the consequences of removing development constraints in this area. PMM18 is neither justified nor consistent with national or local policy because it directly conflicts with the guidance on green belt - that it should preserve the special character of historic towns. The land at St Peter's contributes to the views of York's historic Minster and city and to the "green wedges" that are an essential shaping component of the City of York's unique historic character.</p> <p>Alternative proposed: Remove PMM18</p>
1007	Sharon Tagger	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>Green Belt status is consistent with NPPF: land forms part of York's 'green wedges', part of the City's essential historic character; retains views (including of York Minster); controls sprawl from St Peter's School. Weakening planning constraints by removing land from green belt could lead to unsustainable development because of the flood risk status (Flood Zone 3) of the area.</p>

1011	Joan Turner Woodward	PMM18 - St. Peter's School (Policies Map North) link	not sound	Green belt land is a precious resource. Not only is it valued by residents and visitors alike, it is a vital area that supports biodiversity. The area is fragile and there is the risk of increased flooding as artificial surfaces do not absorb excess water. There is also a toxicity risk to the river because of runoff.
1013	Peter Hanson	PMM18 - St. Peter's School (Policies Map North) link	not sound	Not Justified: TP1 GB Addendum 2021 and July 22 Statement of Common Ground with St Peter's give a MORE appropriate approach to GB boundary. Council MMP approach consistent across all school sites. Not justified at St Peter's where green wedge/openness/setting and special character need greater weight. Not positively prepared Flooding: Flood Risk 3 land. EA say no development without adequate drainage. Traffic: 022/02288/FULM: Highways and Consultant say proposal will increase vehicle movements. Not consistent with Local Plan/National Policy. Current use preserves openess, wedge. Removal conflicts with NPPF 2012 p. 87/88. Not Legally Compliant Big policy U turn due to mid-Nov 22 note to Council. Rushed Council re-work, no proper scrutiny. Wording of 16th November Note: Note implies land at St Peter's does not contribute to openess; Note implies proposed School re-building programme should be a reason for moving the boundary. Not lawful to prejudge undetermined planning applications.
1019	H Graham	PMM18 - St. Peter's School (Policies Map North) link	not sound	Objects on the following grounds: Flood risk, encroachment on Yorks green and open space, increased traffic and damaging the setting and character of our historic city.
1021	Michael Cardwell	PMM18 - St. Peter's School (Policies Map North) link	not sound	The removal of the St Peter's land from the Green Belt is not justified in that there is no exceptional circumstance. Land retains openess and maintains views of Minster and city centre. It's removal from GB would not be compliant with the NPPF.
1024	Ruth Graham	PMM18 - St. Peter's School (Policies Map North) link	not sound	Development is on land which should remain GB. Concerned with impacts from traffic (including on safe walking and cycling) and other impacts on riverside space.

1025	Prof David Schultz	PMM18 - St. Peter's School (Policies Map North) link	not sound	The proposed policy is inconsistent with the 2021 document that spent 43 of the 351 pages justifying the inclusion of the playing fields in the Green Belt. The proposed modifications are inconsistent with the goal to protect the setting and special character of historic towns. Removal of the Green Belt in this area risks urban sprawl on the open space by the river.
1027	Paul Tomlinson	PMM18 - St. Peter's School (Policies Map North) link	not sound	Taking St Peter's playing fields out of the green belt will lead to unrestricted sprawl of synthetic pitches, flood lights and other buildings along a previously designated green wedge. The green and open character of the land that St Peter's wants to take out of the green belt contributes to the setting of the River Ouse corridor. Views of York Minster from the River Ouse corridor and flood embankment will be obstructed by flood light poles and other building work on the playing fields.

1031	Catherine Kingston	PMM18 - St. Peter's School (Policies Map North) link	not sound	<p>NPPF requires mitigation of and adaption to climate change. PMM18 fields are flood zone 3 and flooded with groundwater after extreme weather event in 2015. Any development removing the grass which currently absorbs water will exacerbate the flood risk. EA say subsoil and rock already saturated so any development will increase flood risk to local area. Many trees planted to mitigate prior development enhance the green belt and contribute to flora and fauna biodiversity and flood risk reduction are at risk of removal destroying habitat and the special character of the area going against the NPPF, this is not consistent with sustainable development and is not positively prepared. PMM18 is not justified or consistent with national policy. Adjusting the green belt boundary impacts the natural open landscape and character of the site narrowing the extant green wedge that is such an important asset to the human and wildlife inhabitants of this historic town. This openness is an important amenity enjoyed by many within close proximity to the city centre and extending from Bootham conservation area to link with Rawcliffe Ings a SSSI and bastion of the Tansy beetle. Removal of PMM18 land from GB reduces planning constraints on development and risks increasing urban sprawl, light pollution and increased car movements and reducing the open character with the views of the Minster permanently. In the 2021 iteration of the Local Plan and subsequent hearings, the council were keen to preserve this land open within the Green Belt but appear to have bowed to pressure and done a U turn, no longer protecting the special character of the area as set out in the NPPF that the Local plan should follow.</p>
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1032	Andrew Evans	PMM18 - St. Peter's School (Policies Map North) link	not sound	The reasons for this land being part of the Green Belt are argued in minute detail, very persuasively in the City of York Local Pln document. St Peters School then publicly complained about the Local Plan in 2022, arguing that it would restrict their commercial expansion. This alone has resulted in the PMM18 modifications, which will be to the detriment of the thousands of residents who live and travel through this historic area of York. There was no justification given for this modification and if approved it would make a mockery of the excellent work which went into the Local Plan. Adopting this modification is purely about appeasing a single lobbying organisation - which is shameful.
1033	Ruth Buckley	PMM18 - St. Peter's School (Policies Map North) link	not sound	The respondent has submitted a separate table with extracts from 'Topic Paper 1: Approach to Defining York's Green Belt Addendum (2021) Annex 3: Inner Boundaries', where specific mention of St Peters is made, covering Section 3, Boundaries 7 (Scarborough Bridge), 8 (Front of Almerly Terrace and Rear of Sycamore Terrace - rear of St Olave's School), 9 (Rear of St Peter's School), 10 (St Olave's School) & 11 (Rear of Westminster Road). The submitted table concluded that there was no justification for the removal of St Peters Playing Fields from the Green Belt.
1036	Cynthia Wood	PMM18 - St. Peter's School (Policies Map North) link	not sound	Several reasons, mainly floodlighting - general light pollution but especially for nearby residents. The digging up of grass verges to widen the road - we need more grass verges, not fewer, to help ease flooding; the fact that it is a flood plain will mean a lot of work will be needed to alleviate that; increased volume of traffic in an already busy area and the loss of a safe and quiet place to walk.
1043	Nigel Mitchell	PMM18 - St. Peter's School (Policies Map North) link	not sound	Negatively affect local area and reduce green space.

PMM19 Homestead Park

No representations received

PMM20 Clifton Park Hospital

1 representation – not sound

977	NHS Property Services_Clifton Park Hospital	PMM20 - Clifton Park Hospital (Policies Map North) link	not sound	While amendments to GB boundaries to exclude Clifton Park Hospital are supported in principal it is considered that the boundary is still too tight and should be amended in relation to the area of open space to the North adj to A19. Alternative proposed: Amend GB boundary to exclude area of land to north adjacent to A19.+M89.
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PMM21 Burton Green Primary School

No representations received

PMM22 Nestle Factory

No representations received

PMM23 The Poppleton Centre

1 representation – not sound

929	Poppleton NP Committee	PMM23 - The Poppleton Centre (Policies Map North) link		Seeks to change GB boundary to include half of paddock adjacent to Blairgowrie within GB Alternative proposed: Change to GB boundary adjacent to Blairgowrie.
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PMM24 Edge of Monks Cross/Vanguard car parks

1 representation – n/a

232	Stephen Lornie	PMM24 - Edge of Monks Cross/Vanguard Car parks (Policies Map North) link		<p>The policy map as shown in PMM24 shows the Existing Openspace at Huntington Stadium has not been corrected to reflect the redevelopment of the stadium site. The pitch is now in a slightly different location than before, and as it is now surrounded on all four sides by stands does it really count as open space??</p> <p>Alternative proposed: Update maps in PMM24 to reflect re-development of Community Stadium.</p>
<p>PMM25 Pottery Lane no representations received</p>				
<p>PMM26 Osbaldwick Gypsy and Traveller Site 1 representation – not sound</p>				
825	Cllr Warters	PMM26 - Osbaldwick Gypsy and Traveller Site (Policies Map North) link	not sound	PMM26 and EX/CYC/121a seek to utilise land designated for grazing (to support the 2013 expansion) for extra pitches. This is unacceptable.
<p>PMM27 Derwent Valley Industrial Estate PMM28 Stockton on the Forest no representations received</p>				
<p>PMM29 York Cricket Club 1 representation – not sound</p>				
971	JLL obo NHS	PMM29 - York Cricket Club Boundary (Policies Map North) link	not sound	<p>Inclusion of Lime Trees site in GB is not justified or consistent with neighbouring sites. Site does not contribute to openness.</p> <p>Alternative proposed: Amendment to GB boundary to exclude Lime Trees buildings and hardstanding from GB. Additionally remove inaccurate open space designation which washes over buildings.</p>
<p>PMM30 Imphal Barracks 1 representation – 1 sound / 1 not sound</p>				

345	Avison Young obo DIO	PMM30 - Imphal Barracks (Policies Map South) link	sound	DIO support proposed modification to the Green Belt boundary, this is now considered consistent with national policy and fully justified.
345	Avison Young obo DIO	PMM30 - Imphal Barracks (Policies Map South) link	not sound	Boundary for ST36 should be redrawn to include the land to the east as this forms part of the DIO's masterplan areas for the site. Would be fully effective. Alternative proposed: Boundary for ST36 should be redrawn to include the land to the east to GB boundary as this forms part of the DIO's masterplan areas for the site. Maps provided. Would also require modifications to Policy H1 to increase site size from 18ha to 26.8ha.
PMM31 Askham Bryan 1 representation – not sound				
974	O'Neils's obo Askham Bryan	PMM31 - Askham Bryan (Policies Map South) link	not sound	The GB boundary is not rationally drawn and includes buildings in GB which make no contribution to openness. The GB boundaries restrict future growth for the college. Education designation does not accurately reflect land use. Alternative proposed: Revise GB boundary to exclude entire site from GB. Amend education designation to exclude private housing and include additional land to south.
PMM32 Moor Lane, Woodthorpe 1 representation – sound				
381	Yorkshire Wildlife Trust	PMM32 - Moor Lane, Woodthorpe (Policies Map South) link	sound	Supports boundary with the inclusion of Moor Lane as edge of the urban settlement.
PMM33 Little Hob Moor No representations received				
PMM34 Campleshon Road Open Space 1 representation – n/a				

869	Ray Calpin	PMM34 - Campleshon Road Open Space (Policies Map South) link	<p>PMM34 has been brought about as a result of the Proposed Detailed Inner Green Belt Boundary Modification PM93: York Racecourse (EX/CYC/9h) and the proposed Section 8 Boundary 15-16 York Racecourse (A3:834) (EX/CYC/59e). PMM34 is not justified as it cannot be deemed an appropriate strategy when considered against the reasonable alternative in Topic Paper 1 - Approach to define York's Green Belt - Addendum 3 - March 2019 (EX/CYC/8d). This reasonable alternative consists of the following two boundaries. Section 8 Boundary 15 East of the Racecourse (A3:482-A3:484) and Section 8 Boundary 16 Campleshon Road (A3:485-A3:487)</p> <p>Alternative proposed: Propose use of reasonable alternative in Topic Paper 1 - Approach to define York's Green Belt - Addendum 3 - March 2019 (EX/CYC/8d). This reasonable alternative consists of the following two boundaries. Section 8 Boundary 15 East of the Racecourse (A3:482-A3:484) and Section 8 Boundary 16 Campleshon Road (A3:485-A3:487)</p>
<p>PMM35 Elvington Industrial Estate PMM36 South of Askham Bar Park and Ride PMM37 University of York Campus West boundary PMM38 Heslington PMM39 Heslington Lane south of University of York Campus PMM40 Heslington Road and The Retreat PMM41 Germany Beck and Fordlands Road PMM42 Rowntree Park PMM43 Scarcroft Allotments PMM44 York College PMM45 Lord Deramore's School, Heslington PMM46 Elvington Airfield Industrial Estate PMM47 Vale of York Academy and Bootham Junior School PMM48 Haxby Road Primary Academy and Greenfields Community Garden PMM49 Robert Wilkinson Primary Academy No representations received</p>			

PMM50 St Peter's School

25 representations received – 1 sound / 23 not sound / 1 n/a

365	Rachael Maskell MP	PMM50 - St Peters School (Policies Map North) link	not sound	<p>I strongly oppose the modifications PMM18 and PMM50 at St Peter's School and request their removal from the plan. The reasoning for this was detailed in the City of York Council's EX/CYC/59c: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4.</p> <p>I am concerned that shifting the previously proposed greenbelt boundary and giving this land an 'education allocation' will pose a risk to the openness of the land, with its clear views of the Minster within a compact urban setting. The previously proposed line (PM75 EX/CYC/58 [2021]) offers a more robust boundary to the Green Belt at St Peters School with a greater degree of permanence.</p>
883	O'Neil's obo St Peters School	PMM50 - St Peters School (Policies Map North) link	Sound	<p>Education designation now accurately reflects school campus.</p> <p>Alternative proposed: Open space designation needs revising to exclude playing fields.</p>

998	Cllr Danny Myers & Cllr Margaret Wells	PMM50 - St Peters School (Policies Map North) link	not sound	<p>Oppose the modifications PMM18 and PMM50 at St Peters School. We agree with the detailed reasoning previously set out in the City of York Council's EX/CYC/59c: Topic Paper 1 Green Belt Addendum January 2021 Annex 3 Inner Boundary Part 1 Sections 1 to 4.</p> <p>The shifting of the boundary to allocate land to an 'education allocation' will risk the openness of the land, with its clear views of the Minster within a compact urban setting. The city's compactness within this urban setting is offset by the fields of St Peters and Queen Annes, which offer increased public amenity, as they are green, with open character and part of the river corridor; this land therefore functions as part of the 'countryside' and contributes to a countryside character through its openness and views.</p> <p>The green wedge and wider biodiversity connection to the Site of Special Scientific Interest at Rawcliffe Meadows and Clifton Ings is important environmentally as well as being of high amenity value within the inner green belt area. Further to this, views of the Minster will be could be impacted by an allowance of unrestricted sprawl as floodlit artificially surfaced hockey pitches would demonstrate; this would have an urbanising influence on the area.</p> <p>We oppose the modifications PMM18 and PMM50 at St Peters School, and ask that they are removed from the new Local Plan.</p> <p>Alternative proposed: Remove PMM18 and PMM50.</p>
1000	Victor Keith Stannard	PMM50 - St Peters School (Policies Map North) link	not sound	<p>No need to change use as national rules for GB allow replacement buildings (as school argue), and Sport England say replacing grass pitches with artificial ones (as school wishes to do) is against current guidelines and actually reduces educational sporting flexibility. (Sports England comments to app: 22/02288/FUL attached to submission made by Mr Stannard)</p> <p>Alternative proposed: Remove PMM18.</p>

1003	Andy Pingle	PMM50 - St Peters School (Policies Map North) link	not sound	<p>The proposal encourages the building that will have a detrimental impact on the local environment. Future building and that will follow the loss of green belt will result in an increase in car usage and car individual journeys that contribute pollution, congestion, noise and detract from the sustainability of the locality for the people who live in the area. Further development that results in additional car journeys serves to exacerbate that are already poor ratings for air quality in the area. Removal of green belt removes the natural soak away facility of rainwater which can contribute to the increase in flood risk. The area has been negatively impacted by flooding due in part the inability of natural watercourses and rainfall to soak away into natural tributaries. Green Belt should preserve the special character of historic towns. The area plays an important part in preserving the unique natural and historic environment and provides an important green wedge to stop urban sprawl</p>
1015	Paul R Goulden	PMM50 - St Peters School (Policies Map North) link	not sound	<p>Not positively prepared: ANY development of this green belt area WILL increase flood risk, which is already at flood risk level 3.</p> <p>Not consistent with the national policy: Removal of green belt status of any land in the city does not 'preserve the setting and special character' of our historic town. It merely encourages development, crowding, encroachment on existing open space, and excess use of vehicles.</p>

1016	Miss J Meredith	PMM50 - St Peters School (Policies Map North) link	not sound	Not positively prepared: ANY development of this green belt area WILL increase flood risk, which is already at flood risk level 3. Not consistent with the national policy: Removal of green belt status of any land in the city does not 'preserve the setting and special character' of our historic town. It merely encourages development, crowding, encroachment on existing open space, and excess use of vehicles.
1019	H Graham	PMM50 - St Peters School (Policies Map North) link	not sound	Objects on the following grounds: Flood risk, encroachment on Yorks green and open space, increased traffic and damaging the setting and character of our historic city.
1020	Virginia Riggall	PMM50 - St Peters School (Policies Map North) link	not sound	Green belt boundaries should only be changed in 'exceptional circumstances'. Proposed development is not conducive to 'open space'.
1022	Sallie Moxon	PMM50 - St Peters School (Policies Map North) link	not sound	Opposing the removal of Green Belt designated land (PMM18) at St. Peter's on the grounds of openness, the special character of the area and the importance of the green wedge that links the City Centre to the Site of Special Scientific Interest of Clifton Ings and Rawcliffe Meadows.
1025	Prof David Schultz	PMM50 - St Peters School (Policies Map North) link	not sound	As mentioned in reference to PMM18, the Green Belt is inconsistent with national policy to preserve the setting and special character of historic towns. Removal of the Green Belt risks urban sprawl and encroachment on open space by the river.
1026	Karen Merrifield	PMM50 - St Peters School (Policies Map North) link		Modification opens up land to development with potential impacts on flooding, congestion, air quality. Plan should preserve GB and open space.

1029	Kathleen Wood	PMM50 - St Peters School (Policies Map North) link	not sound	Sustainability: Allowing future development on this site will be detrimental to the local flora and fauna in particular the local bat population and the rare tansy beetle site of interest. This is certainly a flood risk area, any change would be at odds with international pledges to reduce carbon emissions. Recent research has revealed that flooding could increase by more than a fifth over the next century. National Policy states that Green Belt should 'preserve the setting and special character of historic towns'. This area is well used by York community for exercise and contributes to the wellbeing of residents. The green corridor along the riverside is a vital part of our city and should be preserved for future generations.
1030	Bryan Wood	PMM50 - St Peters School (Policies Map North) link	not sound	Sustainability: 1) Risk of flooding, 2) Danger to inhabitants in this area, 3) This open space alongside the river adds to the beauty and character of the city, 4) it would be a devastating loss.
1035	Gareth Child	PMM50 - St Peters School (Policies Map North) link	not sound	The modifications will allow developments that are harmful to the natural environment and potentially destroy habitats for bats, birds, small mammals and insects. The value of this area lies in it being countryside within the bounds of the city.
1037	Joy Barker	PMM50 - St Peters School (Policies Map North) link	not sound	The application isn't consistent with achieving sustainable development. Not justified when considered against reasonable alternatives. Inconsistent with national policy. Increases flood risk. Increases car journeys. Risks urban sprawl and fails to preserve the setting and special character of historic towns.

1038	Oliver Price	PMM50 - St Peters School (Policies Map North) link	not sound	The application isn't consistent with achieving sustainable development. Not justified when considered against reasonable alternatives. Inconsistent with national policy. Increases flood risk. Increases car journeys. Risks urban sprawl and fails to preserve the setting and special character of historic towns.
1039	Julie Barker	PMM50 - St Peters School (Policies Map North) link	not sound	The application isn't consistent with achieving sustainable development. Not justified when considered against reasonable alternatives. Inconsistent with national policy. Increases flood risk. Increases car journeys. Risks urban sprawl and fails to preserve the setting and special character of historic towns.
1040	Stephen Bartker	PMM50 - St Peters School (Policies Map North) link	not sound	The application isn't consistent with achieving sustainable development. Not justified when considered against reasonable alternatives. Inconsistent with national policy. Increases flood risk. Increases car journeys. Risks urban sprawl and fails to preserve the setting and special character of historic towns.
1041	Bella Price	PMM50 - St Peters School (Policies Map North) link	not sound	The application isn't consistent with achieving sustainable development. Not justified when considered against reasonable alternatives. Inconsistent with national policy. Increases flood risk. Increases car journeys. Risks urban sprawl and fails to preserve the setting and special character of historic towns.
1043	Nigel Mitchell	PMM50 - St Peters School (Policies Map North) link	not sound	Negative impact on green space and environment. Potential development is not for education purposes but more driven by commercial interets.
1045	Sarah Hewison	PMM50 - St Peters School (Policies Map North) link	not sound	This area is critical for flood defence as well as being important open space critical to the character of the city. Such open green spaces are important for those living in York.

1047	Helen Lee	PMM50 - St Peters School (Policies Map North) link	not sound	Concern over sustainability - increase to flooding, increase car journeys. Removal of open space risks urban sprawl and encroachment on open space. PMM18 is not consistent or justified. Not consistent with national policy. Plan does not enable delivery of sustainable development.
1048	Liz Stone	PMM50 - St Peters School (Policies Map North) link	not sound	Removal of this green belt land does not seem justified or consistent with national policy. I do not believe this is the most appropriate strategy for this area. It would permit future development of this land in what is already a very developed area, removing the very little green space that exists around existing urban developments. Any future developments could increase traffic in an area which is already congested and at capacity. Future development could impact on flood risk, potentially increasing the risk to existing homes in the area. Future development would change the character of the area - in direct opposition to the National Policy of preserving the 'setting and character of historic towns'. Future development could have negative impact on the local wildlife in hedgerows and on ancient trees in the area, and on rights of way.
PMM51 Poppleton Ousebank Primary School 3 representations received – 2 not sound / 1 n/a				
269	Janet Sealy Hopton	PMM51 - Poppleton Ousebank Primary School (Policies Map North) link	not sound	Proposed boundary no longer follows defined features on the ground (field hedge has been removed). Rear of Blairgowrie field should be GB, consistent with other properties in this belt of open space, and to preserve the setting of the conservation area. Alternative proposed: Use the Blairgowrie House boundary as the new GB boundary; the GB to cross from the school to the end of the last house on School Lane. Rear half of Blairgowrie field to be GB.
929	Poppleton NP Committee	PMM51 - Poppleton Ousebank Primary School (Policies Map North) link		Seeks to change GB boundary to include half of paddock adjacent to Blairgowrie within GB

				Alternative proposed: Change to GB boundary adjacent to Blairgowrie.
1008	Edith Jones	PMM51 - Poppleton Ousebank Primary School (Policies Map North) link	not sound	Proposed boundary no longer follows defined features on the ground (field hedge has been removed). Rear of Blairgowrie field should be GB, consistent with other properties in this belt of open space, and to preserve the setting of the conservation area. Alternative proposed: Use the Blairgowrie House boundary as the new GB boundary; the GB to cross from the school to the end of the last house on School Lane. Rear half of Blairgowrie field to be GB.
PMM52 Haxby Proposed Train Station PMM53 Scarborough Bridge PMM54 The Minster School PMM55 Millfield Industrial Estate, Wheldrake PMM56 St. Leonard's Hospice PMM57 New Walk Orchard Park PMM58 Nelson's Lane Nursing Home, Dringhouses PMM59 Acomb Primary School PMM60 Stone Court, Hob Moor PMM61 Westfield School PMM62 Westfield March Open Space PMM63 York High School PMM64 The Mount School PMM65 Conservation Areas PMM66 Areas of Archaeological Interest no representations received				
PMM67 Strensall Common Special Area of Conservation (400m buffer) 2 representations received – 1 sound / 1 not sound				
345	Avison Young obo DIO	PMM67 - Strensall Common Special Area of	not sound	Based on our response to MM9.6 this modification is not considered fully justified and should be deleted, the plan as submitted is sound on this basis.

		Conservation (400m buffer) link		Alternative proposed: No modification required; revert to submitted plan.
381	Yorkshire Wildlife Trust	PMM67 - Strensall Common Special Area of Conservation (400m buffer) link	sound	Support 400m linear distance buffer from the SAC boundary
PMM68 Strensall Common Special Area of Conservation (5500m buffer)				
2 representations received – 1 sound / 1 not sound				
345	Avison Young obo DIO	PMM68 - Strensall Common Special Area of Conservation (5500m buffer) link	not sound	Based on our response to MM9.6 this modification is not considered fully justified and should be deleted, the plan as submitted is sound on this basis. Alternative proposed: No modification required; revert to submitted plan.
381	Yorkshire Wildlife Trust	PMM68 - Strensall Common Special Area of Conservation (5500m buffer) link	sound	Support 5.5km linear distance buffer from the SAC boundary

Evidence Base documents

MM ID ref	Respondent Name	Document	Modification sound/not sound	Summary of comment
102	Elvington Parish Council	EX/CYC/76e - Appendix 4 Part 4 - Allocations No Consent - Non-strategic	not sound	Elvington Parish Council still contest that there was no real co-operation between the residents and the Council. We held an open event asking residents to comment on the various options for housing land and this was the least popular as it will cause increased traffic through an existing residential street. The preferred site (H26) has never been relooked at due to CYC's lack of understanding of the village
192	Selby DC	EX/CYC/87 - Local Plan Forecasting Report	sound	Comments made regarding progress on Selby LP. Notes that both Selby and York will meet all OAHN within own boundaries
231	Fulford Parish Council	EX/CYC/87 - Local Plan Forecasting Report	not sound	Concern that the number of trips related to the University is over-estimated. In which case ST15 will generate far more car traffic than is allowed for by EX/CYC/87.
886	York Labour Party	EX/CYC/87 - Local Plan Forecasting Report		The Council has not assessed, as required by DfT (2015), "whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. There is no assessment of the improvements needed to limit the significant impacts arising from the strategic developments proposed in the Plan. There is thus no basis on which to argue that the measures proposed in Policies T1-9 are either necessary or sufficient to limit these impacts, or that the residual cumulative impacts will not be severe.
103	York Civic Trust	EX/CYC/87a - Local Plan Modelling Report	not sound	The Council has not assessed, as required by DfT (2015), "whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development." There is no assessment of the improvements needed to limit the significant impacts arising from the strategic developments proposed in the Plan. There is thus no basis on which to argue that the measures proposed in Policies T1-9 are either necessary or sufficient to limit these impacts, or that the residual

				cumulative impacts will not be severe. The analysis in CYC/87a and CYC/91 fails to satisfy the requirements of NPPF 2012 or DfT (2015) and is thus unsound.
231	Fulford Parish Council	EX/CYC/87a - Local Plan Modelling Report	not sound	The predicted increase in journey times along the A19 (route 4) is substantial and should be considered to be a 'severe' residual impact applying NPPF para 32 and therefore should not be acceptable. ST15 and ST27 should be reexamined on that basis.
332	York Environment Forum	EX/CYC/87a - Local Plan Modelling Report		The Council has not assessed, as required by DfT (2015), "whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. There is no assessment of the improvements needed to limit the significant impacts arising from the strategic developments proposed in the Plan. There is thus no basis on which to argue that the measures proposed in Policies T1-9 are either necessary or sufficient to limit these impacts, or that the residual cumulative impacts will not be severe.
365	Rachael Maskell MP	EX/CYC/87a - Local Plan Modelling Report		I support York Labour Party points on this matter
103	York Civic Trust	EX/CYC/89 - Sustainable Transport Study By Wood July 2022	not sound	This report fails to identify the infrastructure provision needed to satisfy its own principles. No detail is given for: cycle routes to ST26 or to Fulford School; the costs of cycling provision (even though EX/CYC/79 commits to £4m of developer funding); a new segregated overpass across the A64 (even though this is specified in para 25 of EX/CYC/79); and no mention of bus rapid transit or bus priority. No dedicated services are proposed to York city centre, central Leeds, or other key destinations. The only dedicated route proposed is to the University, but routed via Common Lane, which is supposed to be vehicle-free. EX/CYC/89 is inadequate against the requirements of NPPF2012 Paras 17, 28, 32, 35, 41, 58 & 156, and DfT's 2015 Transport evidence bases in plan making paras 2, 3, 5 & 8.
231	Fulford Parish Council	EX/CYC/89 - Sustainable Transport Study By Wood July 2022	sound	Confirms the points made by the Parish Council that the relatively short timescales envisaged by the Council for the implementation of the two proposed new settlements are unduly optimistic. the Study suggests that the main form of active travel for the new settlement would be a high quality bus service and presents no conclusion of the reasonableness of any option presented.

332	York Environment Forum	EX/CYC/89 - Sustainable Transport Study By Wood July 2022	not sound	This report fails to identify the infrastructure provision needed to satisfy its own principles. It is deemed inadequate against the requirements of NPPF 2012 Para 17 (principle 11), 28, 32, 35, 41 (route protection), 58 & 156, and the DfT's 2015 Transport evidence bases in plan making and decision taking paras 2, 3, 5 & 8.
365	Rachael Maskell MP	EX/CYC/89 - Sustainable Transport Study By Wood July 2022	not sound	I support York Labour Party points on this matter
886	York Labour Party	EX/CYC/89 - Sustainable Transport Study By Wood July 2022	not sound	This report fails to identify the infrastructure provision needed to satisfy its own principles. It is deemed inadequate against the requirements of NPPF 2012 Para 17 (principle 11), 28, 32, 35, 41 (route protection), 58 & 156, and the DfT's 2015 Transport evidence bases in plan making and decision taking paras 2, 3, 5 & 8.
103	York Civic Trust	EX/CYC/91 - Comparative Effects Of Different Spatial Distributions	not sound	The Council has not assessed, as required by DfT (2015), "whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development." There is no assessment of the improvements needed to limit the significant impacts arising from the strategic developments proposed in the Plan. There is thus no basis on which to argue that the measures proposed in Policies T1-9 are either necessary or sufficient to limit these impacts, or that the residual cumulative impacts will not be severe. The analysis in CYC/87a and CYC/91 fails to satisfy the requirements of NPPF 2012 or DfT (2015) and is thus unsound.
332	York Environment Forum	EX/CYC/91 - Comparative Effects Of Different Spatial Distributions		The Council has not assessed, as required by DfT (2015), "whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. There is no assessment of the improvements needed to limit the significant impacts arising from the strategic developments proposed in the Plan. There is thus no basis on which to argue that the measures proposed in Policies T1-9 are either necessary or sufficient to limit these impacts, or that the residual cumulative impacts will not be severe.
886	York Labour Party	EX/CYC/91 - Comparative Effects Of Different Spatial Distributions		The Council has not assessed, as required by DfT (2015), "whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. There is no assessment of the improvements needed to limit the significant impacts arising from the strategic developments proposed in the Plan. There is thus no basis on which to argue that the measures proposed in Policies T1-9 are either necessary or sufficient to limit these impacts, or that the residual cumulative impacts will not be severe.

365	Rachael Maskell MP	EX/CYC/92 - Local Housing Needs Assessment By Icenii July 2022		I support York Labour Party points on this matter
231	Fulford Parish Council	EX/CYC/99c - Viability Assessment of ST15 - July 2022		The viability conclusions cannot be relied upon because of 1) unreasonable infrastructure costs; 2) unrealistic delivery timescale; and 3) underplayed construction costs and likelihood of falling house prices.
231	Fulford Parish Council	EX/CYC/105 - Draft Economic Strategy June 2022	not sound	The Strategy does not support the job target set out in the Submitted Local Plan which underlies the housing and employment land requirements. It recognises that most of the employment growth in recent years has been in part-time jobs and this is likely to continue into the future. Local Plan housing requirement is based upon the assumption that all of the 650 jobs will be full-time and these workers will require separate dwellings. In contrast many part-time workers have two or more jobs and therefore the amount of housing required to fill the vacancies will be significantly less.
231	Fulford Parish Council	EX/CYC/106 - Air Quality Annual Status Report June 2022		The report demonstrates why such projections of Local Plan proposals on air quality are necessary. The areas identified as having the worst air quality are also some of the areas which EX/CYC/87a predicts will experience the greatest levels of traffic increase with consequent impacts on air quality. EX/CYC/106 does not provide any assessment of the cumulative impact of the Local Plan proposals upon "local areas" of the City and therefore is not in accordance with NPPF para 124.
253	Lichfields obo Bellway Homes	EX/CYC/107/2 - Affordable Housing Note August 2022		The note highlights the failings of the Local Plan to plan for sufficient homes over the plan period.

975	O'Neil's obo Helmsley Group	EX/CYC/107/3 - Student Housing Policy H7 Note August 2022		<p>Nominations agreements are unworkable in York. The requirement presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York. In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.</p> <p>MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS). EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound</p> <p>Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for affordable student accommodation for which there is an identified need. To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount.</p> <p>In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students.</p>
976	O'Neil's obo Foss Argo Developments	EX/CYC/107/3 - Student Housing Policy H7 Note August 2022		<p>Nominations agreements are unworkable in York. The requirement presents a profound risk to sites coming forward for PBSA, for which there is a current and growing need for in York. In any case, H7(iii) is unnecessary given it effectively duplicates the requirement of H7(i) to demonstrate need. An appropriately worded planning condition can be used to secure occupation by students akin to the use of agricultural worker occupation conditions. Such a condition would meet the tests given need will have been demonstrated to satisfy H7(i). This removes the requirement for third party involvement in the planning process which puts development at risk of delivery.</p> <p>MM5.17 and MM5.18 are reliant on EX/CYC/107/3. The Council itself, has effectively superseded EX/CYC/107/3 when it published its CIL viability study (CVS).</p>

				<p>EX/CYC/107/3 is out of date and cannot be relied upon therefore. As such MM5.17 and MM5.18 render the local plan unjustified, ineffective and unsound</p> <p>Notwithstanding, as a point of principle, if there is any viability headroom from purpose-built student accommodation (PBSA) this should be retained for affordable student accommodation for which there is an identified need.</p> <p>To ensure consistency with draft local plan policy H10, the NPPF, and to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing and affordable student housing contribution due should be reduced by a proportionate amount.</p> <p>In relation to occupation of PBSA, MM5.17 is too prescriptive in relation to use by non-enrolled students.</p>
332	York Environment Forum	EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022		<p>We repeat our ask that far more realistic sums for the range of measures required should be Included in the IDP – in the context of our comments on CYC/87A and CYC/91 and our recommendations on MM14.1</p>
365	Rachael Maskell MP	EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022		<p>Objections - I support York Labour Party points on this matter</p>
886	York Labour Party	EX/CYC/107/8 - Infrastructure Gantt Chart May 2022 Revised August 2022		<p>We repeat our ask that far more realistic sums for the range of measures required should be Included in the IDP – in the context of our comments on CYC/87A and CYC/91 and our recommendations on MM14.1</p>
378	Quod obo Langwith Development Partnership Ltd	Habitat Regulations Assessment Addendum	sound	<p>LDP consider ST15 part of the HRA addendum to be appropriate</p>
383	Natural England	Habitat Regulations Assessment Addendum		<p>If any modifications to allocation numbers within 5.5km buffer to Strensall Common SAC, HRA may need amending.</p>

231	Fulford Parish Council	Sustainability Assessment Addendum	not sound	The SA Addendum and Technical Note do not meet the concerns of the Parish Council which were raised in our previous submissions.
378	Quod obo Langwith Development Partnership Ltd	Sustainability Assessment Addendum	sound	LDP support the findings of SA which demonstrate the proposed removal of land from the Green Belt for a potential secondary school is sound.

Other

MM ID ref	Respondent Name	Modification sound/not sound	Summary of comment
850	National Highways		Nil Return

Appendix I - Non-Duly Made responses

MM ID	Representor	Reason
NDM01	Inaki Gaspar	Response incomplete - no soundness reasons or overall comments submitted to modification reference selected.
NDM02	Jacqueline Goodman	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM03	Frankie Power	Response incomplete - no soundness reasons or overall comments submitted to modification reference selected.
NDM04	Thomas Pilcher OBO Pilcher Homes	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM05	Samuel Devlin	Response incomplete - no soundness reasons or overall comments submitted to modification reference selected.
NDM06	Stephanie Porter OBO ICB York Place	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM07	David John Headlam	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM08	Dr Candida Spillard	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM09	Janice Dunphy OBO Web Adventure Park	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM10	Carrie Geddes	Response incomplete – representor registered contact details only.

NDM11	Rachel Semlyen	Response incomplete – representor registered contact details only.
NDM12	Sophie Roberts	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM13	Rose Berl	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM14	Mark Knowles	Response incomplete – no modification reference selected; no soundness reasons or comments provided.
NDM15	Derek Harkess	Response incomplete - no soundness reasons or overall comments submitted to modification reference selected.
NDM16	Lesley Pratt	Response incomplete - no soundness reasons or overall comments submitted to modification reference selected.