



City of York Local Plan Modifications Consultation 2023

QUESTION SUMMARIES

DATA TRENDS

INDIVIDUAL RESPONSES

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COMPLETE

Started: Thursday, March 23, 2023 10:33:19 PM
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Page 1: Survey Information

Q1

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

Yes

Page 2: Register for consultation

Q2

Your name:

Peter Hanson

Q3

Contact details: Please provide email and/or address

Address

City/town

Post code

Email address

Q4

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

Yes

Page 3: Your response

Q5

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

Proposed Policy Map Modifications - link

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459 responses



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Respondent skipped this question

Page 5: Section 2: Vision

Q7

To which modification does this response relate?

Respondent skipped this question

Page 6: Section 3: Spatial Strategy

Q8

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

Q15

To which modification does this response relate?

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Page 14: Section 11: Climate Change

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Page 16: Section 14: Transport and Communications

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Page 17: Section 15: Delivery and Monitoring

Q19

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Page 18: Proposed Policy Map Modifications

Q20

To which modification does this response relate?

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

Page 19: New evidence documents

Q21

To which evidence document does this response relate?

Respondent skipped this question

Page 20: Comment Form

Q22

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

Object

Q23

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

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

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

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

Q24

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

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

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Local Plan Consultation: Objection to PMM 18 · Removal of St Peter's Playing Fields from Proposed Green Belt

Submitted by: Peter Hanson, 54 Westminster Road, York, YO30 6LY

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

- It is not Justified
- It is not positively prepared
- It is not consistent with National Policy NPPF
- It is not Legally Compliant

Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence

PMM18 does not satisfy the above criteria because more appropriate strategies exist. I cannot do better than refer to the strong arguments made as recently as 2021 and July 2022 by City of York Council in the following documents:

EX/CYC/59c Topic Paper 1 Approach to Defining York's Green Belt Addendum 2021 Inner Boundaries Annex 3 at pA3:204 to A3:211

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The above documents develop strong arguments and show signs of meticulous preparation over a period of time. By contrast, PMM18 has been hastily prepared following a brief note from the Planning Inspectors dated 16th November 2022. Time pressure has led to inaccuracies and an approach that is not justified:

PMM18 & PMM50 were presented to the Council Executive on 26th January 2023. Several aspects of this meeting need to be mentioned here as they support the allegation that PMM18 and PMM50 are not justified:

PMM50 as presented to the Executive, contained several significant ownership and boundary errors. This suggests a "rush-job" that has not had the same rigour applied as the more appropriate alternative laid out by the Council in the above referenced documents. The change in boundary in PMM18 is therefore not justified as it fails the test of "being the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence".

Council Officers explained that they had reviewed all school sites mentioned by the Inspector plus others and had adopted a consistent policy across all sites. In the case of PMM18 this is NOT appropriate because of the special benefits associated with this area of the green belt (contribution to green wedge, contribution to openness, necessary to keep land open to preserve the setting and special character of the historic city). This is therefore also not consistent with National Planning Policy.

Two key arguments were mentioned by Council Officers at the 26th January Executive meeting when questioned on the appropriateness of PMM18:

- a) We have been told to make these changes by the Inspector

- b) If we don't pass all the PMM proposals tonight then the Local Plan will be delayed until after the Council elections

This is recently generated supporting evidence to show that PMM18 and PMM50 are not justified. It also offers an argument to say that due legal process has not been followed.

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).

Failure to follow due process:

The proposed change in PMM18 has come about from a note from the Inspectors dated 16th November 2022, seemingly a long while after all other Local Plan meetings had concluded. It is also approximately 3 weeks after St Peter's School submitted a planning application to develop a commercial sports facility, access road and 87 space car park on land which the Inspector was suggesting strongly to the Council might be incorrectly designated as green belt. City of York Council, under pressure to get the long running Local Plan saga concluded has rushed through a set of proposed changes on school sites in an attempt to appease the Inspector. The result is PMM18, a proposal which fails the "justified" test, partly because the process that has produced it has been last minute and put the Council under huge pressure to get amendments made quickly so it can be rubber stamped, consulted on and approved before the local elections.

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).

Applying Weight to Inappropriate Factors in directing City of York Council's green belt review at St Peter's School.

As a layman, I am not clear if the following arguments fall under "not justified" or "legal procedure". I would like them to be read as referring to both of these grounds for objection.

In his 16th November note to St Peter's School the Inspector says:

Also, at St Peter's School, the flood defence bund would appear to be a more rational Green Belt boundary than the school buildings (some of which are scheduled for replacement in any event) given the nature and scale of the sports facilities behind it.

There are several issues here:

1. "the nature and scale of the sports facilities behind it"

This comment can only refer to ex-cyc-59c-topic-paper-1-green-belt-addendum-january-2021 Annex 3 Boundary 9 Rear of St Peter's School. It should be irrelevant to boundaries 10 and 11 (St Olaves School and Rear of Westminster Road) because the land here is open grass rugby pitches with no structures other than rugby posts. However, even in relation to Boundary 9, the comment is not justified because the facilities mentioned are an Astro pitch and tennis courts, neither of which have high fences or floodlighting. Their development in designated green belt land was permitted precisely because they DO still very much contribute to openness, the green wedge, special character and setting of historic towns.

2. **“some of which are scheduled for replacement in any event”**

St Peter’s have apparently shared a “Masterplan” with City of York Council and the Local Plan Inspector. In the Statement of Common Ground between The City of York Council and St Peter’s School (883) July 2022, the Council clearly explained why they could not take as yet unknown planning applications into account in determining the green belt boundary. The school’s complaint that this means they would have to identify exceptional circumstances every time they wanted to encroach into green belt land is a perfect demonstration of why green belt and the principles underlying it need to exist. It is especially true on a site which has been open for 2,000 years and which makes a massive contribution to openness, the green wedge and the special character and setting of York.

The words **“some of which are scheduled for replacement in any event”** are not appropriate in this context. The fact that the school wants to rebuild its older buildings is not a reason to change a designated green belt boundary. It conflicts with NPPF 2012 para 83 (changes to boundaries should only be made in exceptional circumstances). It also gives an impression of pre-judging the outcome of as yet unsubmitted and non-determined planning applications. The land should be designated green belt in line with the Council’s previous detailed and well argued assessments. If St Peter’s determines that they cannot meet their development needs within their existing footprint, then they should submit a planning application demonstrating the special circumstances that justify such an encroachment. If planning permission is granted then the green belt would continue with the same strong and clearly defined boundary, being the edge of the school buildings, wherever the planning application process has determined that should be.

It can be noted that St Peter’s School has multiple car parking and drop off areas. If the school were to embrace a sustainable school transport policy they might well be able to free up land currently needed to cope with the number of vehicular users accessing the school site.

3. The Inspector’s note of 16th November made other general comments:

Green Belt Boundaries Site visits have shown up a few concerns about detailed Green Belt boundaries. In particular, these relate to the approach to sports fields that are part of a wider complex where the boundary has been drawn tight around buildings, rather than the overall complex itself. This does not appear correct where the sports facilities involved involve enclosures of significant height, floodlighting, and other facilities, that make little or no contribution to openness. It seems to us that in these cases, the boundary would be better drawn around the curtilage of the facility involved, especially when boundaries to that curtilage are significant in themselves, and more easily defensible.

The quote is approximately half of the full communication. It is, however, not supportable in the context of St Peter’s School. The tennis and Astro facilities that do exist on the land proposed for de-designation from green belt by PMM18 do NOT have any flood lighting. Nor do they have enclosures of significant height. Any ancillary facilities are low height. Their development was permitted precisely because they do not diminish the sense of openness and hence the land still plays an important role in fulfilling key green belt priorities. City of York Council stated on 26th January that they had followed the Inspector’s advice and applied a consistent policy across all sites. In the case of St Peter’s this is not justified because it means they have considered factors they should not have done (boundaries of re-developed building and extent and nature of existing facilities) and as a result have not given sufficient weight to factors they should have done (demonstrable openness of the whole area and resulting positive contribution to the green wedge and the special character and setting of York).

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

Flooding:

Land proposed to be de-designated from green belt under PMM18 is in Flood Zone 3 as determined by the Environment Agency. As part of St Peter's recent planning application 22/02288/FULM they have confirmed that this will not change, even though the height of the flood bank has been raised. They have also said they will continue to object to St Peter's Application unless the School can demonstrate that drainage from the field in question into the Burdyke already exists.

The land already has a use (school sports facility) consistent both with green belt designation and flood risk. The proposal to remove it from green belt will be in conflict with NPPF 2012 para 87 & 88.

Traffic:

The land in question is City Centre and can only be accessed via peaceful residential roads. The surrounding main roads (A19, Water End, Clifton Green) are congested and have high levels of air pollution. The land is therefore not appropriate for any development that would produce a further increase in vehicular movements in the area. This point is made generically, but can be applied to a specific real world example: St Peter's planning application 022/02288/FULM. City of York Council Transport Department and an Independent Traffic Consultant have both raised serious concerns regarding increases in traffic from the proposed commercial Astro facility and car park. PMM18 is thus NOT positively prepared because the consequence of de-designation will be future development that does not meet the criteria of sustainability. The current use is ideal, open sports pitches that contribute to the special character of the area and which provide both educational and sporting benefit.



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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 openness, 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 openness; Note implies proposed School re-building programme should be a reason for moving the boundary. Not lawful to prejudge undetermined planning applications.

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