

YORK

CITY OF YORK  
LOCAL PLAN  
Topic Paper TP1

Approach to defining York's Green Belt  
ADDENDUM  
January 2021

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## Section 1: Introduction

- 1.1 This document is a revision of the “TP1 Addendum”. The original addendum was prepared and added to the York Local Plan Examination Library on 9<sup>th</sup> May 2019 - referenced as ‘EX CYC 18 Green Belt TP1 Addendum’. Six annexes are referenced EX CYC 18a-f in the library.
- 1.2 The strategic approach to the Green Belt within York had been previously set out at a high level through Topic Paper 1 ‘Approach to Defining York’s Green Belt’ (May 2018) [TP1]. Further to TP1, the purpose of the original addendum was to provide “*further detailed information about the York Green Belt and the Local Plan; specifically, the methodology and evidence for the setting of inner and outer Green Belt boundaries; the exceptional circumstances test for the removal of land from the Green Belt; the approach to Urban Areas within the Green Belt; and the allocation of strategic sites within the general extent of the Green Belt*” (paragraph 1.2, EXCYC18).
- 1.3 This revised addendum clarifies the methodology and revises the text to properly represent the methodology developed and applied for setting York’s Green Belt Boundaries. It is a response to concerns raised by the Inspectors examining the York Local Plan and the following events and written exchanges with the Council:
  - Phase 1 of the hearings into the examination of the City of York Local Plan held at York Racecourse held in December 2019.
  - The submission of a Green Belt Clarification Note [EXCYC39] on 8 June 2020 by the Council - relating to ‘homework’ agreed during the above hearings on Green Belt matters.
  - The Inspectors’ letter to the Council [EX INS 15] on 12 June 2020 regarding the proposed green belt in the Local Plan.
  - The Council’s letter of response to the Inspectors [EXCYC40] on 22<sup>nd</sup> June 2020 - indicating how the Council intended to proceed
- 1.4 In producing this revised addendum, the Council aims to address concerns raised by the Inspectors following the Phase 1 Local Plan Examination Hearings as set out in the 12 June letter. In addressing these concerns this document:
  - simplifies and clarifies the methodology relied upon to delineate the proposed Green Belt boundaries
  - sets the methodology out in four linked sections (5-8)
  - ensures that the criteria used for boundary definition have more clearly expressed connections to Green Belt purposes
  - removes elements that have caused confusion
  - applies the methodology as now clarified with more detail to show how boundaries were justified
  - revises the text to explain why, notwithstanding the methodological concerns raised by the Inspectors, the proposed boundaries (with minor proposed amendment) remain sound under the application of the clarified methodology.

## Section 2: Key Issues Addressed

### **a) Introduction**

- 2.1 This section sets out the policy context for the consideration of the proposed Green Belt boundaries, as well as the views expressed by the Inspectors on Green Belt issues following the first stage of examination hearings<sup>1</sup>. This section also sets out the structure of this revised addendum.

### **b) York Green Belt: approach to policy and general conformity with the RSS**

- 2.2 National policy advice, set out at paragraphs 82 to 85 of the National Planning Policy Framework (NPPF) (2012) (see Section 13 of the current 2019 version), distinguishes between:
- establishing new Green Belt;
  - defining of boundaries to a Green Belt, where the general extent of the Green Belt has been established; and
  - the review and alteration of an existing Green Belt boundary to remove land from the Green Belt.
- 2.3 The Local Plan is not proposing to establish any new Green Belt. The Inspectors confirmed that the general extent of the York Green Belt is already established and the Local Plan is not, as a matter of general principle, seeking to establish a new Green Belt. Saved Regional Spatial Strategy (RSS) policies YH9(C) and Y1 (C1 and C2) and the key diagram (insofar as it illustrates the general extent of the Green Belt) establish the general extent of the Green Belt around York. This exercise has therefore already been completed; there is an existing Green Belt (paragraph 8 [EXINS15]).
- 2.4 The York Local Plan is tasked with formally defining the detailed inner and (outstanding sections of the) outer boundary of the York Green Belt for the first time. The Inspectors have accepted that the Local Plan is establishing, not altering, Green Belt boundaries (paragraph 21) and that, subject to the need for further detailed scrutiny of the proposed boundaries, the proposed delineation of the boundaries is in general conformity with saved elements of the Regional Spatial Strategy.
- 2.5 The Inspectors have concluded that the Local Plan does not need to demonstrate exceptional circumstances for any of the proposed Green Belt boundaries, including those relating to the proposed housing allocations (see paragraphs 22-29). This is because the question of the need for exceptional circumstances is only engaged in respect of the alteration to established Green Belt boundaries, which as above is not the case here.

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<sup>1</sup> Inspectors Letter to City of York Council, 12 June 2020. Local Plan Examination Library reference EX INS 15

Consequently, it is not necessary for the inner and outer Green Belt boundaries to be justified on the basis of the existence of exceptional circumstances. The same conclusion applied to the delineation of Green Belt boundaries for the purposes of allocating land for development or for “insetting” existing villages.

- 2.6 The Inspectors also agreed that the emphasis placed on the fourth NPPF Green Belt purpose (preserving the setting and special character of historic towns) is appropriate in the context of York (paragraph 36) as is taking account of the ‘drivers’ identified for the Local Plan Spatial Strategy (the need for development and its proposed distribution) in the Green Belt methodology (paragraph 33).

### **c) The Inspectors’ principal concerns**

- 2.7 Significant concerns were expressed about the Local Plan Spatial Strategy “shapers” which have been taken into account though the plan making process, particularly in deciding where new development should be located. The Inspectors considered that a number of the shapers were of little direct relevance to the purposes of including land in the Green Belt (with examples given that air quality and flood risk should not have any bearing on the delineation of Green Belt boundaries) (paragraph 35).
- 2.8 In terms of Green Belt purpose 4 (“*to preserve the setting and special character of historic towns*”), the Inspectors identified an area of potential weakness in the evidence, by reference to the map produced to show parcels of land associated with that purpose (see Figure 6 and the composite map at Figure 7 particularly [EXCYC18]). Paragraph 4.17 of the Addendum says “*areas not identified on the appraisal map may still be important to the historic character and setting [of York]*”. The Inspectors considered that the identification of only the most important areas on the map was an area of potential weakness in the evidence (paragraph 37).
- 2.9 In relation to Green Belt purpose 1 (“*to assist in safeguarding the countryside from encroachment*”), the Inspectors did not consider the Council was justified in relying on the proximity of shops and services (access to two or more services within 800m) as a means of determining whether the development of land would lead to unrestricted sprawl. This appeared to be an erroneous conflation of the “shaper” that is about “promoting sustainable forms of development” and this Green Belt purpose (paragraph 38).
- 2.10 In relation to Green Belt purpose 2 (“to prevent neighbouring towns from merging into one another”), the Inspectors considered that there are no towns of concern around York, such that any issues regarding the coalescence of smaller settlements and villages, where their individual identity is important to the setting and special character of York, should be considered under the fourth purpose (paragraph 39).

2.11 The Inspectors advised that perhaps their most significant concern related to Green Belt purpose 3 (“*to assist in safeguarding the countryside against encroachment*”). Their concern was that from the both the Topic Paper [TP1] and the Addendum [EXCYC18] that the following types of land have been identified as areas that should remain permanently open in relation to this Green Belt purpose:

- a) nature conservation sites;
- b) existing open space;
- c) green infrastructure corridors; and
- d) ancient woodland.

Their concern was that the presence of any one of these features should not be considered to be an indication in itself that the land it occupies is inevitably ‘countryside’, let alone countryside that would be encroached into if it were to be developed (paragraph 41). The Inspectors considered that the approach taken again suggested a conflation of this Green Belt purpose and the “shapers” in the Local Plan which were not a robust substitute for a proper analysis of the degree to which land performs the Green Belt function in question (paragraph 42).

2.12 The use of Figure 7 in the Addendum to illustrate the composite effect of assessing the Green Belt purposes was noted to result in the identification of land which was strategically important to keep open, but different from the boundaries resulting from the more localised assessments. The Inspectors accepted that the differences may indicate the application of appropriate planning judgment, but raised a further concern that the local assessment criteria did not have a clear and unequivocal connection to the Green Belt purposes. Examples included the local criteria for assessing whether land protects historic assets (including the presence or absence of listed buildings on the land) and also whether land serves a countryside function on the urban fringe (including analysis of landscape character and the type of open space)(paragraphs 46-7).

#### **d) Structure and content of this document**

2.13 The Council accepts the criticisms made by the Inspectors. This revised Addendum addresses the concerns they raised and adds explanation and commentary to demonstrate that the delineation of the proposed boundaries is robust and justified.

2.14 It does so by taking up the indication from the Inspectors that a revised, simpler methodology could have avoided some of their concerns. It therefore:

- (a) proceeds on the basis that, as the Inspectors have found, the approach to defining detailed Green Belt boundaries is broadly in general conformity with the RSS;
- (b) revises the methodology used to assess how boundary delineation performs against Green Belt purposes by removing those aspects which rely on “shapers” in the Local Plan, in favour of considerations which are explicitly linked to each of those purposes;
- (c) when considering purpose 4, provides further explanation of how the Heritage Topic Paper [SD103] was taken into account to identify all

- areas that are considered to be important to the historic character and setting of York;
- (e) revises the assessment at both a strategic and detailed local level accordingly, whilst continuing to place particular emphasis on purpose 4, as accepted by the Inspectors;
  - (f) confirms how the revised approach followed by the Council accords with both saved policy in the RSS as well as policy in the NPPF relating to the definition of Green Belt boundaries.
- 2.15 The structure of the earlier Addendum has been revised, both to provide a clearer assessment of the boundary definition process against the requirements of the NPPF and to reflect the conclusion of the Inspectors that exceptional circumstances do not need to be shown in cases where the Council proposes to allocate land or inset settlements or villages through the boundary-setting process. These changes are reflected in the Annexes, which apply the methodology to detailed decisions on boundary setting.
- 2.16 In response to questions raised by the Inspectors at the first stage of the examination, this document also incorporates a further explanation of how the Green Belt boundaries will have a permanence that endures beyond the lifetime of the Plan.
- 2.17 **Section 3** sets out the key requirements and implications of the National Planning Policy Framework and the Regional Spatial Strategy, highlighting the key implications for the setting of Green Belt boundaries.
- 2.18 The Local Plan Strategy, including its approach to meeting York's development needs, is explained in **Section 4**.
- 2.19 The Green Belt methodology is set out in a series of stages. Firstly, it explores policy parameters and considerations to identify Strategic Principles which can be applied in the consideration of setting the detailed boundaries of the York Green Belt in **Section 5**
- 2.20 These strategic principles then scope the boundaries which need to be set, for the remaining sections of the York Outer boundary, main urban area inner boundary, and other urbanised clusters including villages in **Section 6**.
- 2.21 **Section 7** then explains how the Council, in accordance with the NPPF, has taken account of the need to promote sustainable patterns of development, in particular by channelling development towards urban areas, and towns and villages within the Green Belt and locations beyond the outer Green Belt boundary. This section also describes how the boundary definition process took into account the need to ensure consistency with the Local Plan strategy for meeting identified development requirements.
- 2.22 **Section 8** sets out the clarified detailed methodology for setting Green Belt boundaries taking in to account strategic principles (see sections 5), Green Belt purposes and more detailed boundary setting questions applied locally.

- 2.23 **Section 9** explains the site identification and selection process in accordance with the Local Plan strategy, consideration of the role of Heritage Impact Assessments in minimising harm to the Green Belt and offsetting through compensatory improvements. Where sites are adjacent to existing urban areas and form part of the boundary setting exercise, the detailed analysis is set out in the respective annexes (Annex 2: Outer Boundary; Annex 3: Main Urban Area Inner Boundary; Annex 4: Other Village or Industrial Estate Boundary). Where sites have been considered in further locations, more separated from the existing built up areas of York, the detailed analysis is set out in Annex 5.
- 2.24 NPPF policy on safeguarding and the need to establish permanent boundaries that do not need to be altered at the end of the Plan period is addressed specifically in **Section 10**.
- 2.25 **Section 11** draws overall conclusions, referring back to how the Council has addressed the Inspectors' concerns.

## Section 3: Regional and National Policy Context

### **a) Regional Spatial Strategy Requirements**

- 3.1 The principle and general extent of a Green Belt around York is established by the Regional Spatial Strategy (RSS) (adopted May 2008 [CD032]). The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013 came into force on 22 February 2013 (Town and Country Planning, England, Statutory Instrument, 2013 No. 117 [CD021]). This Order partially revoked the Regional Strategy for Yorkshire and Humber (which comprised The Yorkshire and Humber Plan RSS to 2026 and the Regional Economic Strategy for Yorkshire and Humber 2006-2015) but retained the policies in relation to the York Green Belt and Key Diagram.

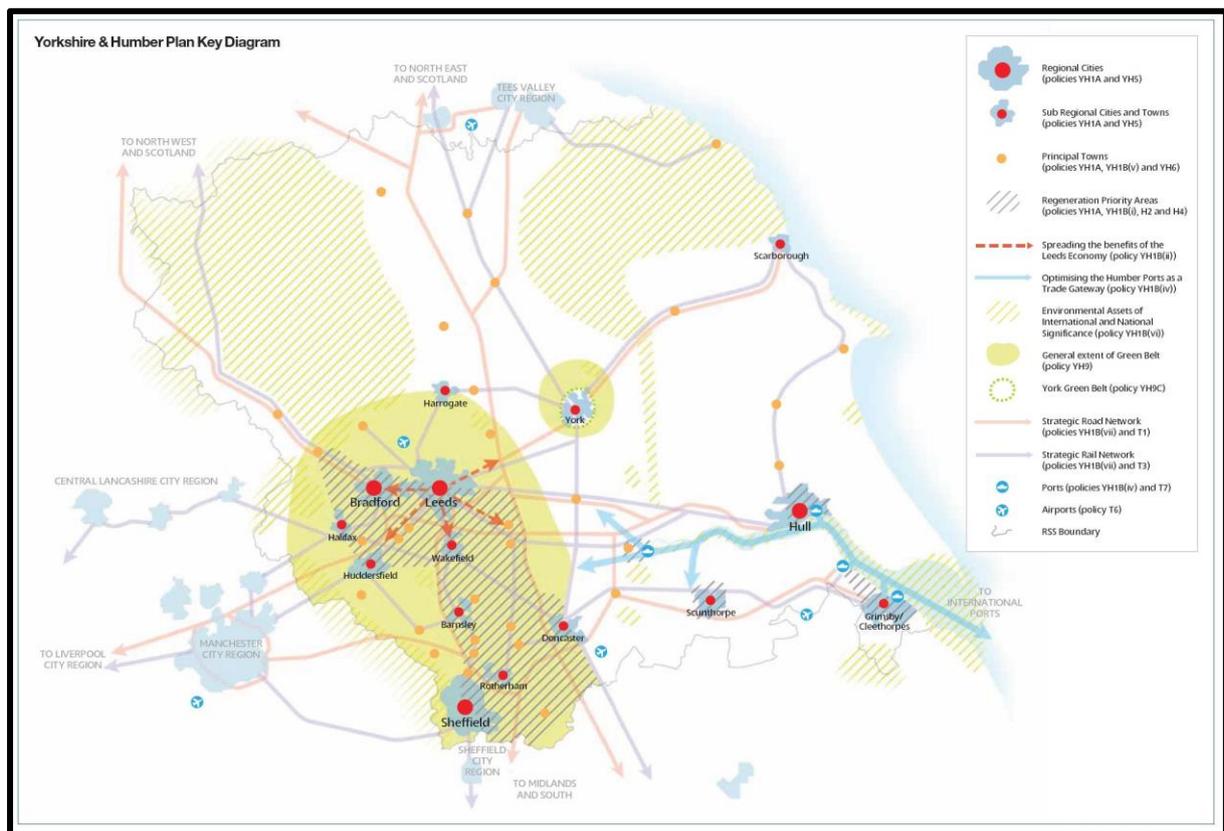
*Figure 1: 'Saved' RSS policy*

SCHEDULE	Article 2
RSS York Green Belt policies	
<b>POLICY YH9: Green belts</b>	
C The detailed inner boundaries of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city.	
<b>POLICY Y1: York sub area policy</b>	
Plans, strategies, investment decisions and programmes for the York sub area should:	
C Environment	
1. In the City of York LDF, define the detailed boundaries of the outstanding sections of the outer boundary of the York Green Belt about 6 miles from York city centre and the inner boundary in line with policy YH9C.	
2. Protect and enhance the nationally significant historical and environmental character of York, including its historic setting, views of the Minster and important open areas.	

- 3.2 As set out in Figure 1 above, there are two RSS Green Belt policies 'YH9: Green Belts' and 'Y1: York Sub Area Policy'. RSS Policy YH9 sets out that the primary purpose of the Green Belt around York is to "*safeguard the special character and setting of the historic city.*" RSS Policy Y1 requires York's next development plan document to define the detailed boundaries of the York Green Belt (both the inner and outstanding outer boundaries) and refers to the outer boundary being around 6 miles from the city centre. It also refers to protecting and enhancing York's "*nationally significant historical and environmental character*" in plans and strategies relevant to the whole of the York sub area, which in the RSS extended beyond the City of York authority boundary.

- 3.3 The saved RSS key diagram is shown in Figure 2. As the Inspectors have concluded, the Key Diagram is a broad, schematic illustration of the RSS policies and there is nothing in the policies to suggest that York’s boundaries should seek to replicate precisely the illustrations of the Key Diagram (paragraph 10 of their letter [EXINS15]). The green dotted line on the Diagram leaves open the question of where the inner boundary should be drawn, but is explicitly linked to the policy requirement to define boundaries, which safeguard the special character and setting of the City (paragraphs 12-13). As for the outer boundary, the requirement to draw a boundary “about 6 miles” from the City centre does not demand precision or stipulate any specific point within the centre from which this point should be measured (paragraph 15). Further, consideration for the York’s historic and environmental character should be considered across plans and strategies relevant in the whole of the York Sub Area. This is therefore relevant when in setting the detail of the outer boundary.
- 3.4 These policy requirements are considered further in Sections 5 and 6 of this document.

**Figure 2: ‘Saved’ RSS Key Diagram**



- 3.5 A Green Belt area around York, as a matter of planning principle and policy as established through the RSS, has also been confirmed through planning appeals (see *Wedgewood v. City of York* [2020] EWHC 780 (Admin) at [21] and [39]).

## **b) National Planning Policy Requirements**

- 3.6 At the national level, the National Planning Policy Framework (NPPF), National Planning Practice Guidance (NPPG) and ministerial statements provide policy and guidance on the role and function of Green Belts. Under 'transitional arrangements' for Local Plan preparation, it is the March 2012 NPPF which applies to the York Local Plan (as opposed to the more recent 2019 NPPF).
- 3.7 The purpose of the planning system is to contribute to the achievement of sustainable development which has inter-related economic, social and environmental dimensions (NPPF (2012) paragraph 7). Core planning principles underpinning both the plan-making and decision-taking roles of the planning system (paragraph 17) include "*promoting the vitality of our main urban areas, protecting the Green Belts around them*".
- 3.8 Given that the York Local Plan is tasked by retained RSS policy with formally defining the detailed inner and outstanding sections of the outer boundary of the York Green Belt for the first time, NPPF paragraphs 84 and 85 are relevant:
- "84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*
- 85. When defining boundaries, local planning authorities should:*
- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
  - not include land which it is unnecessary to keep permanently open; where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
  - make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
  - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
  - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*
- 3.9 Green Belt, NPPF 86 is also relevant to Section 6:
- 86. If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be*

*included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be and the village should be excluded from the Green Belt.*

- 3.10 Decisions on where to set green belt boundaries should also take into account other aspects of the NPPF which refer to the broad objectives of Green Belt policy and the purposes of the Green Belt:

*“79. The fundamental aim of Green Belt policy is to prevent sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

*80. Green Belt serves five purposes:*

- to check the unrestricted sprawl of large built-up areas;*
- to prevent neighbouring towns merging into one another;*
- to assist in safeguarding the countryside from encroachment;*
- to preserve the setting and special character of historic towns;*
- and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

- 3.11 This revised Addendum therefore shows how the following considerations have been taken into account and applied having regard to NPPF policy:

- a. the need to promote sustainable patterns of development, in particular the consequences of channelling development towards urban areas and towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary; and to ensure consistency with the Local Plan strategy [*NPPF paragraphs 84-5*]: see Strategic principle SP10 (Section 5) and application in Sections 4 and 9.
- b. the Green Belt purposes, as part of a boundary setting exercise which does not include land which is unnecessary to be kept permanently open but takes account of the need that the boundaries, once established, should be permanent in the long term (para 83) [*NPPF paragraph 85*] to prevent urban sprawl [*NPPF paragraph 79*]: Strategic principles SP1, SP6, SP7, SP8, SP9 (Section 5) and application in sections 6, 8 and 9;
- c. the requirement to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent [*NPPF paragraph 85*]: see strategic principle SP13 (Section 5) and application in Sections 6 and 8;
- d. whether villages should be excluded or included in the Green Belt due to the important contribution which the open character of the village makes to the openness of the Green Belt [*NPPF paragraph 86*]: see Strategic Principle SP5 (Section 5) and application in Section 6;
- e. whether it is necessary to identify areas of safeguarded land to meet longer-term development needs; and whether Green Belt boundaries will need to be altered at the end of the development plan period [*NPPF paragraph 85*]: see Strategic Principle SP12 (Section 5) and application in Section 10.

## Section 4: Local Plan Strategy and Development Needs

### **Introduction**

- 4.1. This section summarises the Local Plan strategy for meeting identified requirements for sustainable development, by describing briefly how the relevant requirements have been identified and how the strategy for meeting them has been formulated and informs the consideration of Strategic Principles in Section 5.

### **a) Development requirements**

#### **Employment Needs**

- 4.2. Local plans should support economic growth in line with paras 21 and 22 of the NPPF (2012) wherein it requires a clear economic vision and strategy to deliver economic growth and accommodate future need identified.
- 4.3. York's Local Plan (2018) [CD001] Policy SS1 sets a priority to "*provide sufficient land to account an annual provision of around 650 new jobs that will support sustainable economic growth, improve prosperity and ensure that York fulfils its role as a key economic driver within both the Leeds City region and the York, North Yorkshire and East Riding Local Enterprise Zone*". This was based upon economic growth scenario forecasting by Oxford Economics set out within the Council's Employment Land Review (2016) [SD064] and subsequent update (2017) [SD063].
- 4.4. The ELR considered job growth forecasts in a baseline scenario and two further scenarios to identify the most applicable growth for the authority:
- Scenario 1 was based on higher migration and faster recovery of the UK economy following the recession, than the baseline;
  - Scenario 2 assumed an unchanged UK outlook from the baseline but considered local level assumptions to align growth in specific sectors to trends within the Strategic Economic Plans.
- 4.5. To sensitivity test the original projections, the latest Experian forecast used within the Regional Econometric Model (REM) have been used for comparison in the 2017 update [SD063]. The Experian model in the REM is used across West and North Yorkshire and therefore represents the most appropriate model for sensitivity testing. Although the assumptions into the REM model differ slightly, this was found to broadly support the OE long term baseline growth projections. It also therefore aligns the York baseline with adjoining authorities in the Functional Economic Area and Strategic Economic plans.
- 4.6. Scenario 2 was chosen as the basis for the employment forecast as it reflects the economic policy priorities of the Council, to drive up the skills of the

workforce and to encourage growth in businesses which will utilise higher skilled staff, as set out in the York Economic Strategy (YES). Scenario 2 forecast an increase of over 11,050 jobs within York by 2031 (490 more than the baseline), which equated to 650 jobs per year in the 2014-2031 period.

- 4.7. The Employment Land Review Update (2017) [SD063] provided an update to the 2016 ELR taking account of annual monitoring data and projecting the need forwards to take account of completions, to ensure flexibility to manage 'churn' and account for any loss of employment land. These figures factor in:
- converting forecasts to full time job equivalents;
  - 5% vacancy rate;
  - Change in supply between 2012-2017;
  - An allowance for existing commitments from unimplemented consents; and
  - 2 years extra supply to provide flexibility in the choice of premises and to counteract the loss of premises.
- 4.8. The 2017 update and the summary presented in the justification for policy EC1 (Local Plan paragraphs 2.6-4.7 [CD001]) identify the employment land requirements for B1, B2 and B8 uses over the plan period (2017-2033) to be 180,170 sqm/28.2 ha.
- 4.9. To ensure there was appropriate flexibility in the employment land requirements for a Green Belt which will not need to be altered at the end of the plan period, the average land requirements were projected forward by 5 years to 2038. Requirements projected to 2038 identified an additional requirement for 31,094sqm/6 ha to create a total need of 211,264 sqm/ 34.3 ha of employment land.
- 4.10 The Council commissioned Oxford Economics in 2019 to update the scenarios to understand whether the economic needs of the city continued to align with the provision of 650 jobs per annum as well as housing need in the "York Economic Outlook" (Dec 2019 [EXCYC29]). The 2019 forecast report uses the same scenario assumptions tested previously, including scenario 2 (re-profiled growth) taken forward by the Council. To compare the employment results with the shorter forecast period in the original forecasting, 2019-2031, the re-profiled growth scenario results show an increase of 660 jobs on average per year over this period, compared to 610 in the baseline forecasts.
- 4.11 Looking at the updated forecast period of 2017-2038, total employment in York under scenario 2 will be stronger. The total number of jobs is expected to reach 130,300 in 2038, up by 10,780 from 2017 and 1,250 jobs higher than in the baseline. This is equivalent to an increase of 510 jobs per year between 2017 and 2038, compared to the 450 jobs per year in the baseline forecasts. The figures have changed from the original forecasting based on an update to the baseline from 2015 to 2019, which starts the forecast at a higher employment level and has removed this strong employment growth set out in the previous years of data. In addition, employment growth is projected to slow in the longer term compared to earlier in the forecast period (up to 2031).

- 4.12 In conclusion, Scenario 2 now shows an increase of an average 660 jobs per annum in the period of 2019-2031 and an overall average 510 jobs per year over a longer timeframe of 2019-2038. The Council considers that the outcomes of the 2019 forecasting continues to support the level of job growth as set out in the Local Plan for 650 jobs per annum over the plan period and beyond to 2038 in line with York's aspirations for economic development and defining the green belt boundaries. It is at yet difficult to assess what effect the Covid -19 pandemic and Brexit will have on growth and therefore no allowance is made for this.

### **Housing development needs**

- 4.13 The submitted City of York Local Plan (2018) [CD001] is being examined under transitional arrangements and therefore consideration has been given to household projections (as opposed to the standard methodology set out in NPPG) when calculating the Objectively Assessed Housing Need for the city (OAHN).
- 4.14 In line with NPPF (2012, Para 158), the City of York OAHN has been informed by the latest available information and revised projections as well as the Planning Practice Guidance (PPG) on Housing and economic needs assessment (Paragraph 016: Ref ID: 2a-016-20150227), which advises that:
- “The government’s official population and household projections are generally updated every 2 years to take account of the latest demographic trends. [...] Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up to date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued”.*
- 4.15 When the Local Plan [CD001] was submitted for examination in 2018, the most recent household projections were the 2014-based projections published by the then Department for Communities and Local Government in July 2016. These were taken into account to support the housing requirement figures in the submitted Plan, which were based on an objectively assessed housing need (“OAHN”) of 867 dwellings per annum (see Strategic Housing Market Assessment (2017) [SD051]).
- 4.16 The Office for National Statistics (“ONS”) then published the 2016-based projections in September 2018. The 2016 based projections represented the ONS’ updated view on a range of issues including international migration, fertility and mortality rates as well as further methodological improvements including changes to source data. These showed that on a national and local level, demographic projections and rates of growth had reduced from previous versions and historic trends. The projections were more closely aligned to the

reality of population growth to 2018 than those of the previously used 2014 SNPP.

- 4.17 In response, the Council undertook further work through the Housing Needs Update (January 2019) [EXCYC9] by GL Hearn. Using the 2016-based SNPP data provided a baseline need of 484dpa for York.
- 4.18 However, the 2016 based SNPP changed the methodology for calculating household growth, from using trends in household formation rates documented since 1971, to only using data since 2001. Due to a historic undersupply and worsening affordability of housing in York since 2001, the use of the updated methodology in calculating the household formation rate would continue to suppress the ability of younger age groups (specifically those ages 25 to 34 and 35 to 44) to form households, unless an uplift in supply is created as considered in the PPG: *“The household projection based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends.”* [ID 2a-015-20140306].
- 4.19 The Housing Needs Update (2019 [EXCYC9]) tests the application of different household representative rate scenarios, and their ability to allow certain age groups to be able to form households in the same way that they once did (paras 2.16 to 2.29). This determined that a 40% uplift above the starting point would be required to address these issues, taking the assessed need for the city to 660dpa. If no other adjustments are required, then this would be the OAN i.e. if economic potential was low and there were few affordability pressures in the City. However, this is not the case in York and therefore this figure did not represent a robust OAN.
- 4.20 It was also identified that moving forward with the lower 2016 based projections for York, the city would not have the necessary population to be able to meet its economic aspirations (650 jobs per annum). The PPG (ID 2a-018-20140306) reads that *“Plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate”*. It is therefore a valid approach to examine economic forecasts.
- 4.21 The 2019 update did not seek to test any new forecasts but rather assessed the housing need associated with the planned economic growth (650 jobs per annum), as set by the Employment Land Review [SD063 and SD064] and verified by the York Economic Outlook Report (2019, [EXCYC29]).
- 4.22 In translating 650 jobs per annum into housing need, the Housing needs Update [EXCYC9] assumed that:
- Unemployment remains constant (paragraph 3.5) as this reflects the high levels of employment in the City.
  - The number of people who have more than one job does not increase above long-term trends (3.3%) (See paragraph 3.6).

- Commuting ratios from 2011 levels have been maintained i.e. assuming that York remains a destination for net in-commuting (Table 7)<sup>2</sup>.
  - Economic activity rates (drawn from the Office of Budget Responsibility) will increase in those aged 60 to 69 - linked directly to the change in pensionable age and more females in the workforce (Figure 7).
- 4.23 These assumptions, when applied to the resident population and potential growth to meet job demand also need to consider the part return to trend for Housing Reformation Rates to ensure that these historic deteriorations in household formations for 25-34 and 35 to 44 year olds improve in future. Such an assumption resulted in an economic led housing need of 790 dwellings per annum. This is a 63% uplift above the official 2016 household projections (484 dpa).
- 4.24 Only by providing this level of growth would the population be sufficient to meet the economic growth, while also ensuring that there will be improvements to household representation rates among younger persons. Any level of delivery below this will result in a combination of restricted economic growth (businesses not growing or moving out the City), unsustainable commuting patterns (increasing congestion and over-crowded public transport) or reduced household formation rates (greater levels of HMOs and/or non-dependent children living with their parents for longer and in greater numbers).
- 4.25 The PPG states that “The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals” and that the “Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need.” This suggests that any other uplifts which have the same effect in increasing need above the start point would also constitute a market signals adjustment.
- 4.26 The Housing Needs Update 2019 recognises a range of affordability issues and suggests that an uplift for market signals of 15% would be appropriate in the City of York (paras 4.1 to 4.35). However, the increase already considered as a result of economic growth is so significant that a further increase is not warranted. The use of the part return to trend housing reformation rates considered in the economic led housing need calculations also address local affordability issues (Table 7).
- 4.27 Members of the Council’s Executive resolved that the objectively assessed housing figure of 790 dpa, recommended by the City of York Housing Needs Update (2019 [EX/CYC/9] be accepted at the meeting on 7 March 2019.

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<sup>2</sup> This remains the most robust assessment of commuting patterns. Divergence from it should be done so through the duty to cooperate to ensure housing needs are met across authorities.

- 4.28 Having established the OAN, the figure was translated into a growth target for the purposes of plan-making wherein the 'housing requirement' can be adjusted upwards or downwards to support economic or other growth ambitions or downwards due to development constraints. Sufficient flexibility also needs to be included within the housing requirement and site allocations to ensure that, as a minimum, the OAN can be met, even if individual sites fail to deliver against current expectations.
- 4.29 Given that household projections do not reflect unmet housing need, the Council, in line with PPG, has also assessed net housing completions over the period 2012 to 2017 and calculated any under-supply against the OAN of 790 dwellings per annum. This analysis shows that over the period 1st April 2012 to 31st March 2017 there were 3,432 net housing completions. The OAN over this period was 3,950 dwellings (790 x 5) leaving a shortfall in actual supply of 518 dwellings.
- 4.30 In order to provide these further 518 dwellings over the plan period (to 2033), an additional 32 dwellings per year (518 homes total over the 16 year plan period) were added to the OAN to get to a final housing requirement figure of **822 dpa** in order to ensure that the plan accurately reflects unmet historic housing need over the plan period.
- 4.31 The OAN of 790 and Housing requirement of 822 were consulted on as part of the proposed modifications Consultation (2019) and subsequently discussed at phase 1 hearing sessions in December 2019.
- 4.32 More recently the 2018 Sub-National Population Projections (SNPP) and Sub-National Household Projections (SNHP) have been released. This has led to the Inspectors asking the council to explore the impact of this updated evidence on the proposed OAN for the city in their letter dated 9 July 2020 [EXINS16]. It is as yet difficult to assess what effect the Covid -19 pandemic and Brexit will have on these figures and therefore no allowance is made for this.
- 4.33 The Council commissioned a Housing Need Update 2020 ("HNU" 2020), which interrogates the 2018-based sub-national population projections and 2018-based sub-national household projections to consider the implications for household growth and housing needs in the City of York, using the methodology for needs assessment that remains relevant to plans that are subject to the transitional arrangements. The core analysis looks at housing need over the period 2017-33 to be consistent with the Local Plan period. To align with previous studies carried out, figures are also provided for the 2012-2037 period.
- 4.34 In considering the 2018 based sub-national population projections in comparison to previous projections, the HNU (2020) identifies that York has a lower demographic starting point consistent with national trends in population change and migration (see Table 1). However, the ONS acknowledges the potential difficulties in drawing trends from just two years of data and the HNU (2020) therefore considers that there is a strong rationale to apply not only this

“principal variant” but also variant trend analysis produced by ONS, which is based on a 10-year migration variant and an alternative internal migration variant. For the plan period, these give growth of 5.9% and 4.6% respectively compared to the 3.6% growth on the principal variant (see paragraphs 2.8-9 and Table 2).

- 4.35 The HNU considers the 2018-based household projections. These show an unadjusted baseline increase per annum in households which, when translated into dwellings, amounts to 302 dpa (2017-2033) and 352 dpa (2012-2037). This is compared to figure 454 dpa (2012-37) in the HNU (2019), which used the 2016-based projection (see paragraphs 2.10-11). When the preferred variants are applied these figures increase to 383-471 dpa (2017-2033) (and 413-481 dpa (2012-2037)) (paragraphs 2.12-3 and Table 4).
- 4.36 As set out in the HNU (2019), there continue to be concerns around household formation rates which, it is said, lock-in recessionary trends during the 2001 to 2011 period from which they were drawn. To be consistent with previous analysis, GL Hearn therefore examine the impact of partially returning the household representative rates (HRRs) to previous trends for the 25-34 and 35- 44 age groups. For the principal variant this increases the housing growth to 501 dpa over the plan period. When the preferred variants are applied, these figures increase to a demographic housing need of 598-669 dpa (2017-2033). GL Hearn regard the variant migration scenarios as being the more suitable to use for York. They produce a figure that is not a significant change compared to 679 dpa in the HNU (2019) (paragraphs 2.17-19 and Table 5).
- 4.37 However, it is also necessary to address economic-led housing need. As with the analysis in the HNU (2019), GL Hearn have applied guidance in the PPG which requires plan makers to consider how the economy might perform, having regard to the likely growth in job numbers based on past trends and/or economic forecasts as appropriate.
- 4.38 The submitted Local Plan relied on a scale of economic growth of 650 jobs, which was corroborated by the economic forecasting by Oxford Economics published in December 2019 [EX CYC 29]. It was previously calculated that would need to be supported by 790 homes per annum. The HNU (2020) examines the impact of newer data on this economic-led housing need.
- 4.39 The newer data includes updated assumptions around doubled-jobbing, as well as the impact of the 2018-based population projection and the latest 2019-based mid-year population estimates. The key input is the most recent age-profile for the City as well as the various assumptions around fertility, mortality and migration. The updated work on economic-led housing need produces a housing needs range of between 766 – 779 dpa for the plan period (2017-2033) (and 777 -788 dpa (2012-2037)) (see paragraphs 3.2-10 and Tables 5 and 6).
- 4.40 On this basis the HNU (2020) concludes that the range of economic-led housing needs is comparable to the figure of 790 dpa as identified in the HNU

2019 (paragraph 3.11). GL Hearn have not updated the assessment of market signals, but given the extent of the economic need and the uplift this entails from the demographic starting point (302 dpa as set out above) a further uplift would not be merited (paragraph 5.7). They conclude that:

*“the housing need in the City has not changed materially since the last assessment in January 2019. The previous report identified a need for 790 dpa and the economic-led need within this report is as high as 788 dpa. There is, therefore, no need for the Council to move away from their current position based on this new data”* (paragraph 5.8).

- 4.41 The Council supports the assessment and conclusions of the HNU (2020) and therefore continue to support our proposed modification to the plan for a housing requirement of 822 dpa (790 dpa housing plus a shortfall of 32 dwellings per annum). Based on this requirement, there is an overall requirement to deliver 13,152 dwellings in the plan period to 2033.

#### **Needs for ‘culturally suitable’ accommodation for gypsies, travellers and travelling show people**

- 4.42 NPPF (2012) para 159 states that LPAs should have a clear understanding of housing needs in their area, noting that a Strategic Housing Market Assessment should assess their full housing needs for all types of housing and the needs of different groups, and defers to the accompanying Planning Policy for Travellers Sites (PPTS) (2012, updated 2015), which sets out how travellers’ accommodation needs should be assessed. The PPTS (2012, updated 2015) clarifies that LPAs should set pitch targets for gypsies and travellers and plot targets for travelling showpeople (as defined in Annex 1); this should identify 5 years’ worth of deliverable sites and developable sites/broad locations for growth up to years 11-15.
- 4.43 The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2017) [SD059] (GTAA) sets out the additional pitch and plot needs:
- for those households who meet the planning definition as defined in PPTS(2015);
  - for those unknown households where an interview was not able to be completed (refusal or not present after 3 visits to each site) who may meet the definition; and
  - for those households who do not meet the definition.
- This concludes that there is a need for 3 pitches for those Gypsies and Travellers meeting the planning definition and 3 plots for Showpeople within the lifetime of the plan.
- 4.44 Whilst the Council is not required to meet the needs of gypsies, travellers and travelling showpeople who do not meet the planning definition through the provisions of specific pitches/plots, the Council has taken a responsible approach that aims to address all traveller accommodation needs. This work

is set out in the GTTA (2017-Appendix D [SD059]) and equates to a maximum additional need for 44 pitches for gypsies and travellers who do not meet the definition over the plan period. These 44 pitches include meeting the current need arising from concealed households, overcrowding or movement from bricks and mortar, future need arising from the older teenage children and new household formation and a further 11 pitches to meet the remaining unknown need (assumed 90% of the total unknown need will not meet the planning definition).

- 4.45 While the specific needs of the Gypsy, Traveller and Travelling Showpeople community have not been projected beyond the plan period, the current approach taken by the Council provides above the minimum requirements set out by the NPPF. In addition, Local Plan policy allows for flexibility in addressing future supply needs through policy, as set out in section 7.

### **Education Needs**

- 4.46 To contribute to making York a world class centre for education it is vital to provide the quality and choice of learning and training opportunities to meet the needs of children, young people, adults, families, communities and employers. The Local Plan has a role to help meet this vision by providing sufficient land to for educational facilities to reflect the aspiration and needs of local communities.

#### *Pre-school, Primary and Secondary Education*

- 4.47 The City of York authority has 62 schools, including; 48 primary schools; 2 junior schools; 9 secondary schools and 3 special schools. Though the demand for school place has followed the increasing growth in population. Numbers in the primary sector have been rising steadily, but having peaked in the school year 2015/16, (though this is highly localised), York is now showing a small decline year on year. Numbers in the secondary sector are now beginning to increase as those high numbers of pupils in primary move into secondary provision and a steady growth is projected for the next few years.
- 4.48 The council uses a system of pupil planning as agreed with the Education Skills Funding Agency. The housing delivery trajectories and the infrastructure requirements as shown in the Infrastructure Delivery Plan (IDP) May 2018 [SD128] and the additional information provided in response to the inspectors questions [EX/CYC/7], represents the Council's best estimate of annual delivery rates and the associated timing of infrastructure requirements based on developer submissions through the Local Plan consultations and discussions with developers/landowners to date.
- 4.49 This work has established that much of the demand for additional school places in the early part of the plan period between 2017 and 2023 is localised and can be addressed by adding places in to existing provision rather than generating the need to build new schools.
- 4.50 Assessment of future needs for secondary school provision based on the forecast demographic change has shown that there may be a requirement for a new secondary facility in the longer term (post 2023).

### Higher and Further Education

- 4.51 Establishing need for higher education is a more complex process and work to understand the expansion opportunities of these establishments has focused on discussions around recent trends in student numbers and the associated business expansion plans of these organisations as well as an understanding of the type of land uses required and their suitability to fit with the Green Belt. It is at yet difficult to assess what effect the Covid -19 pandemic and Brexit will have on further and higher education and student populations and therefore no allowance is made for this.
- York College - anticipated growth at York College and the need for the continued delivery of its facilities on the existing site, in a sustainable location on the edge of the main York urban area, will require additional land that is currently within the green belt to allow the expansion of the existing built development beyond the existing site boundary. Sufficient land will need to be identified to facilitate the future growth of the college and the continued delivery of facilities at one location.
  - Askham Bryan College's site is located within the Green Belt. It is considered important to maintain the current Green Belt status of the land and any future development must not have a greater impact on the openness of the Green Belt than the existing development.
  - York St John University's main campus at Lord Mayors Walk is within York's main urban area. The development and re-development of the campus will be suitable, provided that it is limited to higher education and related uses, and its design takes account of the sensitive location of the campus and its setting. The provision of additional student housing and the need for additional land for sports uses to support the universities development of a centre for sporting excellence at Northfield, Haxby Road will be met within the main urban area.
- 4.52 The University of York retains a high profile in both the UK and the rest of the world. In the Secretary of State's approval of the campus east extension in 2007, the combination of the educational need for the University of York ('the university') to expand, the considerable economic benefits to the city and the absence of alternative sites formed the very special circumstances for development in the Green Belt. Whilst the continuing development of the University of York's West and East campuses is supported, it is considered that the University will not be able to continue to grow beyond 2023 without an expansion of the existing Campus East.
- 4.53 Based upon evidence from the University, it is projected that growth in student numbers will continue over the plan period. Through their 2016 (Preferred Sites) and 2017 (Regulation 18) consultation responses, the University identify that while student growth will continue throughout the plan period, this is difficult to quantify and acknowledge that this growth will be at a slower rate of increase than that experienced in the past. While they did not provide growth assumptions for beyond the plan period, they indicated a limited steady incline over the years 2022 to 2032 (from 1.25% per annum in their 2016 response, reduced to 0.5% per annum in the 2017 response), which the Council were able to project forward beyond the plan period. The University

also stated that they have no short term need for an increase in academic buildings but seek space for one academic building on any expansion land to maintain the mixed use principles of the site. The University suggest that their focus is on a strategy for growth in research in respect of which they ask for an additional 30,000sqm of B1b employment land in 2016, reduced to 20,000sqm in 2017 up to 2033. No strategy to confirm growth requirements for years beyond the plan period was provided at this stage, other than to confirm an anticipated but unquantified improvement in future economic prospects of the University, the attractiveness of the new site with a potential access to the A64 (assuming a junction can be provided in combination with new garden village ST15) and whether adequate car parking can be provided.

- 4.54 The University has a role to play in helping to meet the city's employment land requirements to 2038 through the provision of knowledge based businesses (B1b) co-located to university functions as part of a mixed use campus. Total land requirements for B1b have been calculated in the ELR (2016 [SD064] and 2017 update [SD063]) at 2.5 ha between 2017 and 2038. Allowance for delivery of more than this quantum at the university has been made with provision of up to 25ha of B1b knowledge based businesses as set out in Policy SS22 and EC1.
- 4.55 Further expansion land to Campus East will be required to enable the key priorities to be realised to support the LEP, the York Economic Strategy and the city's ambitions to be a competitive city and to contribute to the Local Plan's vision to support sustainable economic growth.

### **b) Formulating the Local Plan strategy**

- 4.56 In order to determine the most suitable and sustainable approach to meeting identified needs, Paragraph 4.3.4 of the Local Plan Preferred Options SA (SD007a) states that the appraisal "*focussed on the alternative approaches to policy as opposed to the preferred policy wording to ensure a full understanding of how changing the policy approach could impact on its sustainability*".
- 4.57 With regard to the factors that shape growth, four alternatives for **spatial principles** were considered and appraised at the Preferred Options stage (2013)[SD007; and see SD005]:
- Option 1: Prioritise social and economic spatial principles
  - Option 2: Prioritise environmental spatial principles
  - Option 3: Take a balanced approach to the identified spatial principles
  - Option 4: Prioritise viability and deliverability of development
- 4.58 The preferred approach was Option 3, which sought to take a balanced approach to spatial principles. This balance was anticipated to protect and enhance the city's built and natural environmental assets, avoiding significant negative effects, although it acknowledged that, in order to meet community needs and deliver economic growth, new development may place some pressure on these existing assets. This balanced approach was also expected

to deliver new development that was well served, accessible and supported the use of sustainable public transport.

- 4.59 Overall, none of the reasonable alternatives assessed as part of the SA were considered to perform better, in sustainability terms, than the preferred option that comprise the proposed spatial strategy. Against the 'Factors which Shape Growth' theme, Option 2 (Prioritise environmental spatial principles) was assessed as performing better than the preferred option against the environmental SA objectives with significant positive effects identified in respect of biodiversity, water resources and cultural heritage (although the preferred option was not assessed as having a significant negative effect on these objectives). This reflects the emphasis of this alternative which would be to prioritise the protection and enhancement of York's built and natural environmental assets. However, an approach that prioritises the protection and enhancement of environmental assets could serve to restrict the quantum of new development to be provided and the ability of the Plan to meet housing needs and deliver economic growth, particularly taking into account the environmental constraints of the Plan area.
- 4.60 Four options for the spatial distribution of growth were considered at the Preferred Options stage, consistent with the spatial strategy principles. These options considered the **spatial distribution of growth**:
- Option 1: Prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement;
  - Option 2: Prioritise development within and/or as an extension to the urban area and through provision in the villages subject to levels of services;
  - Option 3: Prioritise development within and/or as an extension to the urban area and through the provision of new settlements;
  - Option 4: Prioritise development within and/or as an extension to the urban area along key sustainable transport corridors.
- 4.61 At this stage, Option 1 was taken forward as none of the reasonable alternatives appraised as part of the SA were considered to perform better in sustainability terms, than the preferred option. It was considered that Option 1 would help to define the role and economic priorities of the York Sub Area, and the spatial distribution of development was expected to meet overall housing and employment land requirements for the City. Whilst Option 4 was assessed as having a significant positive effect on transport (SA Objective 6) as the approach was considered likely to help ensure that new development is highly accessible, it was also assessed as having a negative effect on cultural heritage (Objective 14) and landscape (Objective 15), principally due to the potential for adverse impacts on the setting and special character of York (given the likelihood that this option would result in more linear forms of development).
- 4.62 Two options were also considered in relation to the purpose and function of the York Green Belt:

- Option 1 – Preserving the setting and special character of York should form the primary purpose of York’s Green Belt.
- Option 2 - equal weight should be given to all five NPPF Green Belt purposes.

4.63 The preferred approach (Option 1) was assessed by the SA (2013) [SD007] as performing better than the reasonable alternative (Option 2). Option 1 was expected to help ensure that any land taken forward for development does not undermine York Green Belt being defined to preserve the setting and special character of York. Consequently, it was assessed as having a significant positive effect on York’s historic environment, cultural heritage and character and setting (as well as the city’s natural and built landscape) by keeping open important land for this purpose. Option 2 would place equal weight would be given to this purpose and in consequence, the option identified that it could lead to the development which affects the setting and character of York in the longer term to meet development needs. While prioritising the setting and special character of York, the Preferred Options Local Plan and SA did not conclude that no weight be given to the other purposes of Green Belt which land around York might serve.

4.64 The York Local Plan and its spatial strategy and policies have since progressed on this basis. Broadly, the preferred options that comprise the spatial strategy were identified in the SA [SD007a] to have an overall positive effect with significant positive effects in relation to housing (SA Objective 1), economy (Objective 4), equality and accessibility (SA Objective 5), biodiversity (SA Objective 8), land use (SA Objective 9), cultural heritage (SA Objective 14) and landscape (SA Objective 15). The preferred approach was considered to broadly reflect York’s sub-regional role in the Leeds City Region and the York, North Yorkshire and East Riding LEP, helping to ensure that the city was a key economic driver and retail, service and transport hub, with its housing needs being met within the local authority area whilst conserving and enhancing the city’s historic and natural environment (paras 4.3.15 – 22, [SD007a]).

### **c) Proposed Strategy of the York Local Plan**

4.65 The City of York Local Plan sets out a spatial strategy for sustainable growth. **Policy SS1** (Delivering Sustainable Growth for York) confirms that the strategy is framed around meeting York’s development needs and spatial principles to guide the location of development and also underpins SP10 and SP11 of the York Green belt (See section 5).

4.66 The key drivers for growth reflect the need to provide land for housing and jobs to ensure sustainable economic growth, improve prosperity and build strong, sustainable communities, which address the needs of York’s current and future population as well as to ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York, North Yorkshire and East Riding Local Enterprise Partnership area.

- 4.67 The spatial strategy provides for new development to be guided by the following spatial principles of sustainable development (see Figures 3.1-3 of the Local Plan):
- conserving and enhancing York’s historic and natural environment, including the city’s character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;
  - ensuring accessibility to sustainable modes of transport and a range of services; preventing unacceptable levels of congestion, pollution and/or air quality;
  - ensuring flood risk is appropriately managed; and
  - York City centre is identified as the focus for town centre uses.
- 4.68 Policy SS1 does not establish a settlement hierarchy. However, as explained at the first phase of examination hearings, the Council proposes amendments to the Local Plan to confirm and explain the spatial distribution of development which expresses how the strategy addresses the drivers for growth<sup>3</sup>. As part of this, the key diagram has been updated to reflect the spatial distribution of different land use allocations and Section 3 will include explanatory text to describe the spatial distribution resulting from the application of the spatial principles across the city. This distribution is reflected in the strategic allocations that are proposed to meet identified needs, focussed mainly on development within the urban area, as set out in the remainder of the SS policies in Chapter 3 (Spatial Strategy) [CD001].
- 4.69 Further, **Policy SS2** of the City of York Local Plan in the spatial strategy sets out the role of the York Green Belt. The primary purpose of the Green Belt is included in the policy “*to safeguard the setting and the special character of York and delivering the Local Plan Spatial Strategy*” aligning with Strategic Principle SP1 (Section 5).
- 4.70 The spatial principles and spatial strategy in the submitted Publication version of the plan [CD001] have evolved as a result of consultation and updated evidence base informing officers understanding since the preparation of the Local Plan Preferred Options (June 2013) [SD005]. The application of the spatial principles to the sites gives detailed expression of the spatial strategy. In consequence, their application has also been informed by site specific evidence in relation to York’s designated nature conservation sites and the perception of development to the historic character and setting of York through the Heritage Topic Paper and Impact Assessment as well as site visits with Historic England to further understand harm from proposed allocations.
- 4.71 Predominantly, the sites comprising the original preferred spatial strategy (2013) remain but some have been changed or removed following

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<sup>3</sup> See EX CYC 47 Post Hearings Proposed Modifications December 2020.

consultation in 2016 on preferred sites [SD018] and 2017 (on the Pre-Publication Draft [SD021]) and to reflect that some sites have been consented for development or built out. Notably, the site allocation boundaries fundamental to delivering the spatial strategy have evolved over time, principally to respond to site specific evidence and to help to safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built up area of York to its surrounding settlements. In this regard, Historic England commented at the Preferred Sites Consultation (2016) [CD013M] and reiterated at the Publication (Regulation 19) Consultation stage [CD013A; CD014C (SID118)] that *“It appears evident that the size of these settlements and their location do not threaten the individual identity or rural setting of their neighbouring villages, the green wedges that penetrates into the urban area and important views from the ring road has been designed to take account of the relationship which York has with its existing surrounding villages – an element which has been identified in the Heritage Topic Paper Update as being part of the character of the City”*. Evidence has also been used to refine the strategic allocations within the spatial strategy to ensure that harm to designated nature conservation assets is avoided.

- 4.72 The Plan also seeks to avoid an unconstrained increase in traffic and so supports a pattern of development which favours the use of sustainable transport to minimise the growth in traffic.
- 4.73 The strategy has also recognised the primary purpose of the Green Belt in this location, which is to safeguard the special character of York. The Plan defines inner and outer boundaries for the Green Belt for the first time, but also recognises that there is a need for new development to take place within the general extent of the Green Belt whilst taking account of the other spatial principles identified above.
- 4.74 This approach is in conformity with core land use principles (paragraph 17) in the NPPF (2012) which seeks to provide sufficient land which is suitable for development in sustainable locations that provide multiple benefits, conserve and enhance the natural environment, conserve heritage assets and which *“take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside”*.
- 4.75 The Plan’s strategic policies set out an overall strategy for the pattern, scale and quality of development over the Plan period and focusses on identifying sufficient land to meet housing and economic growth (spatial drivers) in a pattern of development aligned to the factors which shape growth (spatial shapers) set out in SS1.
- 4.76 Local Plan development is directed to the most sustainable locations (aligning with SP10 in Section 5), making as much use as possible of suitable previously developed land (with some release of green belt land). As is set out in SS1, sustainable growth for York emphasises conserving and enhancing

York's historic environment (see SP11, Section 5). The scale and pattern of development is guided by the need to safeguard a number of key elements identified as contributing to the special character and setting of the historic City. These include the City's size and compact nature, the perception of York being a free-standing historic city set within a rural hinterland, key views towards the City from the ring road and the relationship of the City to its surrounding settlements (see SP6 and SP7, Section 5).

- 4.77 Development is focussed on the main urban area of York and in new free-standing settlements with some urban and village extensions. The development strategy limits the amount of growth proposed around the periphery of the built-up area of York. While new settlements will clearly affect the openness of green belt in those locations, their impact is considered to be less harmful to the elements which contribute to the special character and setting of York. The size and location of proposed development has taken into account the identity and rural setting of neighbouring villages and potential impacts on historic character.
- 4.78 There are also opportunities for rural exception sites, including for Gypsy and Travellers not meeting the PPTS definition of a gypsy or traveller. These small scale developments provide affordable homes in locations where new homes would not usually be appropriate.

## **Section 5: Methodology (1): Review of the General Extent of the Green Belt and Scoping**

### **a) Implications of RSS policies for the York Green Belt**

- 5.1 As set out in Section 3, the principle and general extent of a Green Belt around York is established by the Regional Strategy for Yorkshire and Humber (RSS) (adopted May 2008 [SD032]) and is maintained by the RSS (Partial Revocation) Order 2013 [CD021].
- 5.2 RSS Policy Y1 (C) provides that the outstanding sections of outer boundary of the York Green Belt should be defined about 6 miles from York City centre. This implies that where the York Green belt boundary has already been set (in neighbouring authority development plan documents), these areas do not need to be reconsidered as part of this boundary setting exercise. It is therefore implied that in proximity to these area the outer Green belt boundaries should run continuously to join up with these adopted sections.
- 5.3 Policy Y1C also provides generally that plans should protect and enhance the character of York. Policy YH9 requires the inner boundary to be defined to establish long-term development limits that safeguard the special character and setting of the historic city. Both retained policies each reference the importance of protecting and enhancing the significant historical character and setting of York. It is therefore necessary to approach the two parts together and to have regard to the second when approaching the first, including in regard to considering “about 6 miles”, which as stated in Section 3, is not intended to be a precise measurement from any stipulated location and requires the exercise of planning judgment.
- 5.4 While the illustrative RSS key diagram was also saved, it was the intention of the RSS, that the detailed inner and outer boundaries would be established through an adopted local plan. The key diagram was not prepared by reference to a plan base and the “city centre”, from which to measure “about 6 miles”, is not precisely defined in the saved RSS policy. Determining the precise location of the inner and outer boundaries requires the exercise of planning judgment, as identified by the Inspectors in their letter [EXINS15], with consideration to protect and enhance the historical and environmental character of York.

### **b) NPPF Green Belt Openness and Purposes**

#### **Introduction**

- 5.5 Paragraph 85 of the NPPF (2012) states that when defining Green Belt boundaries, local planning authorities should not include land which it is unnecessary to keep permanently open. This corresponds with the requirement in paragraph 83 that “authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”. Paragraph 79 (NPPF 2012) states that the fundamental aim of Green Belt policy is to

prevent urban sprawl by keeping land permanently open. The Council has taken into account the Green Belt purposes (paragraph 80) in considering whether it is necessary to keep land open as part of the boundary setting exercise required by the RSS.

- 5.6 The need to apply Green Belt purposes as part of the assessment has been accepted by the Inspectors. In response to their concerns, the Council has simplified and clarified its approach, as well as explaining more clearly the links between methodology adopted, the detailed/local 'on the ground' assessment and the assessment results and the specific boundaries as set out in the annexes. The approach taken by the Council is explained further in this and later sections.
- 5.7 With regard to **Purpose 2** ("to prevent neighbouring towns merging into one another"), York does not have any other major towns close to the general extent of the Green Belt, so the potential issue of towns merging does not arise. With regard to towns which lie beyond the general extent of the York Green Belt, detailed Green Belt boundaries have already been set by other local authorities. These towns are distant from the City of York and are too far away at present for the need to consider this element of NPPF paragraph 80 for York, as the potential issue of merging does not realistically arise. However, as the Inspectors accepted, the coalescence of smaller settlements and villages may be relevant under Purpose 4, where this issue is considered.
- 5.8 In terms of **Purpose 5** ("to assist in urban regeneration by encouraging the recycling of derelict and other urban land"), this purpose is considered to be achieved through the overall effect of the York Green Belt, rather than through the identification of particular parcels of land which must be kept permanently open. PAS guidance<sup>4</sup> presumes that "*If Green Belt achieves this purpose, then all Green Belt does so to the same extent*".
- 5.9 Although not explicit in the NPPF, the purpose of encouraging the recycling of derelict and other urban land implies a restriction on using open undeveloped greenfield sites for development to encourage the re-use of previously developed land. The Council has considered the extent to which land within the existing urban area, as translated into the site selection process, can accommodate identified development needs. It has also considered all opportunities to maximise the existing urban capacity (as set out in Section 7) and concluded that boundaries need to be set taking in some land outside the main urban area, in order to create a permanent and enduring Green Belt. However, having regard to the PAS guidance, it is not considered that this purpose of itself assists materially in determining where any individual and detailed part of the boundary should be set.
- 5.10 The Council has considered all of the Green Belt purposes, and determined that purposes 4, 1 and 3 are appropriate in examining the general extent of

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<sup>4</sup> PAS (2015) Planning on your Doorstep: The Big Issues Green Belt

the Green Belt and justifying the proposed York Green belt detailed boundaries, but in accordance with RSS policy (and as accepted by the Inspectors) placed primary emphasis on the fourth NPPF Green Belt purpose ("*to preserve the setting and special character of historic towns*"), which is recognised as being appropriate in the context of York.

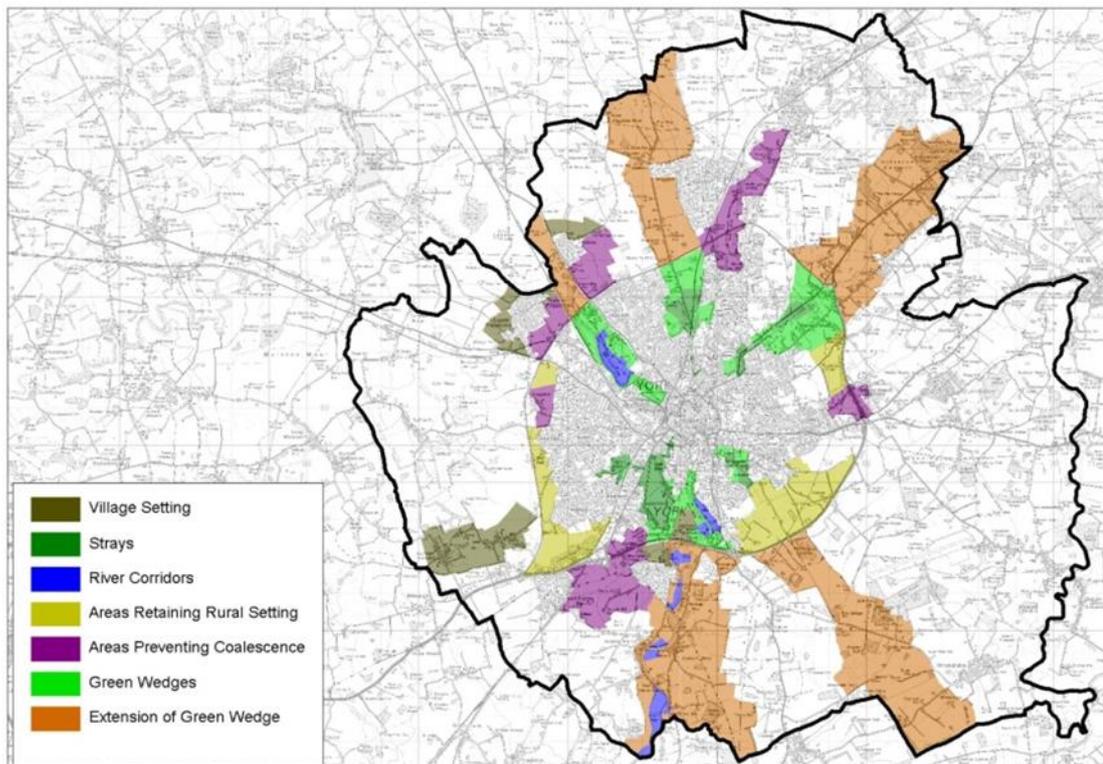
#### **Purpose 4 - Historic Character and Setting of York**

- 5.11 The Green Belt Appraisal (2003) [SD107], with subsequent historic character and setting updates (2011 [SD108] and 2013 [SD106]) and the Heritage Topic Paper (2014, [SD103]), both explain and identify elements that are important to the historic character and setting of York .
- 5.12 “**The Approach to the Green Belt Appraisal**” document was produced in 2003 [SD107a], section 4 of which is titled ‘The Historic Character and Setting of York’. It sets out how the historic character and setting of the City can be defined in terms of the following elements:
- i. Open approaches to the City
  - ii. Green wedges
  - iii. Views of the Minster
  - iv. Character of the Landscape
  - v. Urban Form
  - vi. Relationship between the urban edge and the countryside
  - vii. The relationship with the surrounding villages
- 5.13 Analysis of the above historic character and setting of elements in York, enabled broad categories of land to be identified spatially, these are set out as “City of York – Most Valuable Areas of Green Belt’ in Section 5 of SD107A and explained in more detail through sections 6-9 of this original Green Belt appraisal methodology [2003 SD107A]. The work recognised that many elements overlap or have close relationships with one another and identified the main broad categories of land as:
1. ‘**Areas which retain, reinforce and extend the pattern of historic green wedges**’ This category of land relates to historic strays and Ings and the reasons for their importance are set out. The spatial location and importance of areas that constitute Strays, Ings, Green Wedges and Extensions to Green Wedges is described.
  2. ‘**The setting of villages whose traditional form, character and relationship with the surrounding agricultural landscape is substantially unchanged**’. The spatial location and importance of villages or part villages that fulfil this requirement is set out.
  3. ‘**Areas which provide an impression of a historic City situated within a rural setting**’, with the spatial location and importance of different areas of open countryside that provide this impression explained.
  4. ‘**Areas which prevent the coalescence of settlements to retain their individual identity**’. The spatial location and reasons

underpinning their importance are set out, for different areas of undeveloped land between the outer edge of the urban area and villages, and between villages.

- 5.14 The plans produced in relation to these broad categories sought to identify the swathes of land which, at the time, were understood to be those of the “most” importance to purpose 4 of the Green Belt and did not constitute a comprehensive assessment (see Annex 1). The identified areas were also only identified “*in terms of the primary reason why the area is considered to be important and in some areas there is more than one reason*” [SD107A]. Subsequent updates to the appraisal were produced in 2011 [SD108] and 2013 [SD106] which show changes and modifications to areas identified as Strays, Green Wedges, Extensions of the Green Wedges, River Corridors, Area retaining the rural setting of the City, Village Setting and Areas preventing coalescence (Figure 3).

**Figure 3: Green Belt Appraisal**



- 5.15 In so far as the previous version of this addendum [EXCYC18] may have suggested (paragraph 4.17) that areas not identified on the appraisal map may still be important to the historic character and setting of York, this was not intended to indicate that other areas remained unassessed; rather more detailed assessment had been taken into account by reference to the Heritage Topic Paper below.

- 5.16 **In summary, the Green Belt Appraisal work:**
- did not seek to establish Green Belt Boundaries;
  - predated the Heritage Topic Paper;
  - identified elements that define the historic character and setting of the City;
  - established four categories of land based on analysis of the defining elements - as the most valuable areas of Green Belt;
  - identified and mapped some of the areas understood at that time as spatially representing the four categories of land.
- 5.17 The City of York **Heritage Topic Paper Update**, September 2014, [SD103] examines and assesses existing evidence relating to the City of York’s historic environment to identify the historic landscapes significance, relationships to the wider environment and people and to identify the important attributes, which make up the character of the area as stipulated by the Historic Environment Good Practice Advice in Planning: 3 (2017, Historic England). The document was prepared at the request of Historic England by the Council’s Design, Conservation and Sustainable Development team who provide a specialist advice service within the Council. The paper draws on expertise and experience within and beyond the Council; significant input was provided by Historic England, the Built and Historic Environment sub-group of the Environment Partnership and the Conservation Areas Advisory Panel.
- 5.18 The Heritage Topic Paper delivers a strategic understanding of the City’s special qualities and its complex 2000-year history set out through defining a number of “factors”, “themes” and “characteristics”. It sets out how natural “factors” such as geology, climate, topography, landscape and resources, have determined the location and shape of the setting of the historic settlement of York and how humans have interacted with it to create the historic City itself.
- 5.19 The “themes” are the functions or roles the city has performed through time, and include economy, administration, ecclesiastical, military, communication, residential, leisure and landscape and setting. These themes are important in understanding how the historic character of the city and its setting has developed and been shaped.
- 5.20 Six “principal characteristics” of the historic environment that help define the special qualities of York (and that set the City apart from other similar cities in England) are established by the Heritage Topic Paper:
- 1) the city’s **strong urban form**, townscape, layout of streets and squares, building plots, alleyways, arterial routes, and parks and gardens;
  - 2) the city’s **compactness**;
  - 3) the city’s **landmark monuments**, in particular the City Walls and Bars, the Minster, churches, guildhalls, Clifford’s Tower, the main railway station and other structures associated, with the city’s railway, chocolate manufacturing heritage;

- 4) the city's **architectural character**, this rich diversity of age and construction displays variety and order and is accompanied by a wealth of detail in window and door openings; bay rhythms; chimneys and roofscape; brick; stone; timber; ranges; gables; ironwork; passageways; and rear yards and gardens;
- 5) the city's **archaeological complexity**: the extensive and internationally important archaeological deposits beneath the city. Where development is permitted, the potential to utilise this resource for socio-economic and educational purposes for the benefit of both York's communities and those of the wider archaeological sector will be explored; and
- 6) the city's **landscape and setting** within its rural hinterland and the open green strays and river corridors and lngs, which penetrate into the heart of the urban area, breaking up the city's built form.

5.21 The six principal characteristics are also broken down into component "character elements". All of the principal characteristics and character elements are important aspects of the development of the historic city and have associated visible and hidden expressions within the environment and need to be assessed for all potential development to identify possible harm to the cities special character.

5.22 Given the fundamental purpose of Green Belt to prevent urban sprawl, by keeping land permanently open, consideration of which Heritage Topic Paper [SD103] principal characteristics to apply were important to identify for NPPF purpose 4 and openness of the Green Belt. The characteristics identified as most important are: Compactness, Landmark Monuments and Landscape and setting.

5.23 These characteristics identify that all of the York authority area has the potential to be relevant to purpose 4. This is because they are relevant to understand how areas of open land close to the main urban areas help to maintain compactness and the perception of a city in its rural context, the historical influence of long distance views of the minster and the city in a flat open landscape from distant higher ground and the importance of the wider countryside setting in the relationship of the city and its pattern of smaller settlements.

5.24 Guidance from Historic England, NPPF (2012) and NPPG, recognises that land areas which encompass these principle characteristics of the Heritage Topic Paper can not be definitively mapped as finite or definite areas, but can be assessed in relation to proposals and potential impacts on significance to York's special character and historic setting, at any point in time.

5.25 On this basis:

- all York Green Belt boundaries have been assessed as to their potential impact on the aspects of the Heritage Topic Paper which relate to openness (as per para 5.22) and
- all proposed development within the Local Plan has been assessed against all principal characteristics and subsequent character elements of the Heritage Topic Paper (SD103) to assess the likely impact of

development on the historic character of the city (including the Green Belt) through Heritage Impact Appraisals.

5.26 Applying the Heritage Topic Paper and Impact Appraisals in this way has allowed Purpose 4 to be considered comprehensively across the authority area and not just the primary areas identified through the early Green Belt appraisal work. More detail on this is set out in sections 8 and 9.

**5.27 In summary, the Heritage Topic Paper:**

- provides an updated and more comprehensive assessment of York's special character and setting;
- establishes principal characteristics and character elements;
- establishes that more land than that identified by the Green Belt Appraisal needs to be considered;
- indicates that all open land within the City of York authority area has the potential to be considered for its importance to purpose 4
- includes principal characteristics of Compactness, Landmark Monuments and Landscape and Setting that are relevant to keeping land permanently open;
- does not spatially map any areas;
- requires further interpretation at a more detailed and granular level to define and identify the character 'on the ground' or 'on a small-scale map'

**Purpose 1 - Preventing Sprawl**

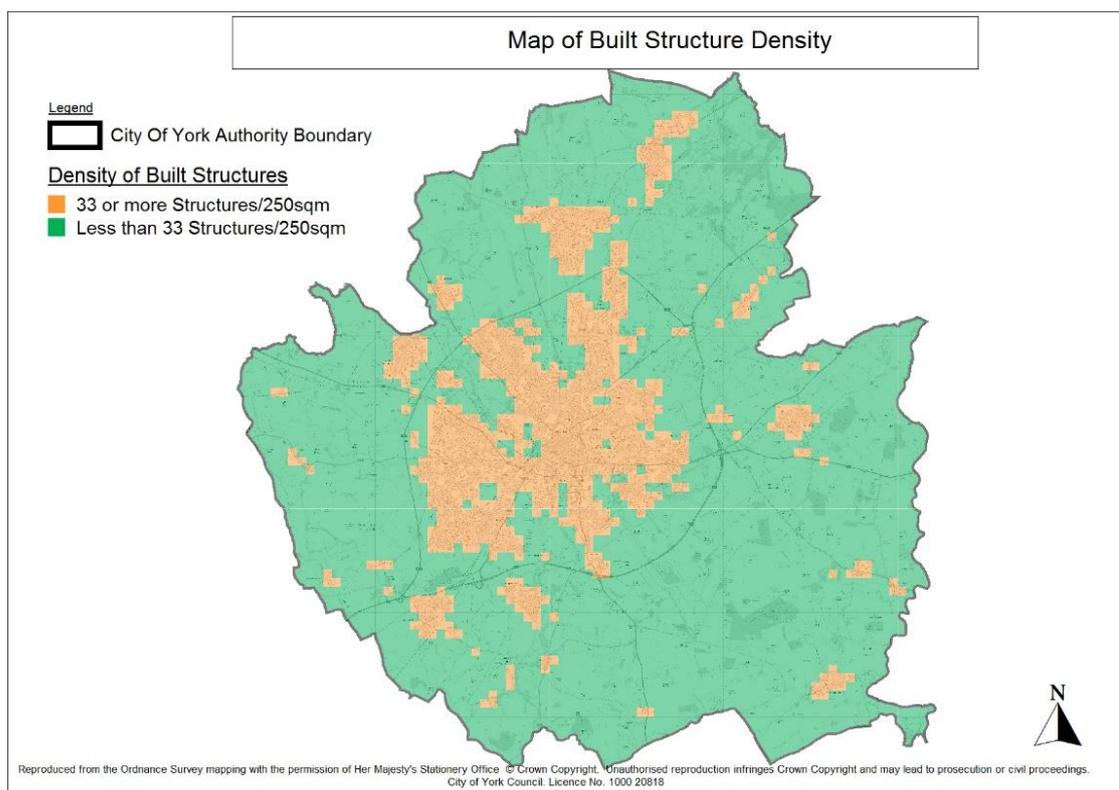
5.28 The main built up area of York, to which the RSS key diagram is primarily referring, is understood to be the areas of dense development which expand outwards from the historic core contiguously.

5.29 Some older historic villages or areas of development, once independent aspects of the settlement pattern of the York hinterland, have been completely subsumed by later urban development and now form part of the contiguous main urban area.

5.30 Where independent historic villages or other urban areas are not entirely subsumed and/or retain a separation from the main urban area, through land uses or context, these still form clusters of built development of varying density and connection to the wider open countryside.

5.31 To better understand the built context of York and the openness of the urban area as well as its setting beyond the urban area, density analysis of the entire authority area was carried out. A GIS approach was used to divide the authority boundary into a grid of 250m squares. Analysis then indicated which squares contain a high density of built structures. Evaluation showed that a density of above 33 built structures per 250sqm gave the most reasonable definition of identifying distinct areas. The outputs of this analysis are shown in Figure 4 (and Annex 1), which depicts one large central area surrounded by a number of smaller clusters of varying size.

**Figure 4: Identifying density of Built Structures**



- 5.32 The Green Belt Appraisal and Heritage Topic Paper both highlight that compactness is a key contributor to York's historic character and setting, with a key feature of the main urban area's setting being that it is contained entirely within a band of open land set within the York Outer Ring Road, which offers a viewing platform of the city within its rural setting. This is illustrated by the density analysis above. The shape and form of the surrounding villages are also identified as being compact and part of a distinct settlement pattern.
- 5.33 In considering the importance of compactness for the existing built up areas of the city and the need to prevent sprawl, there is an overlap between scoping the areas of sensitivity to these elements of purpose 4 and purpose 1 (sprawl) as those which are in proximity to existing built up urban edges and or close to other clusters of development.
- 5.34 In understanding the contained and contiguous nature of the main urban areas, the starting point for investigating where the detailed inner boundary to the main urban area and the York Green Belt should be is therefore scoped as where this juxtaposes with the more open development free land of the rest of the authority (See section 6).
- 5.35 Where other smaller, less dense or non contiguous areas of built structures and development have been identified in Figure 4 these need to be considered separately in more detail in relation to their contribution to openness in line with NPPF 2012 Paragraph 86.

### **Purpose 3 - Protecting the Countryside from Encroachment**

- 5.36 In considering the importance of the open countryside in providing the context for understanding the significance of York within its **landscape and setting**, including the strays, ings, river corridors, Green Wedges, views of the minster and out towards the surrounding wolds, and the relationship of the villages to the city and agricultural heritage, there is an overlap between scoping the areas of sensitivity to these elements of purpose 4 (Historic character) and purpose 3 (encroachment), as those which are currently open in nature and performing rural functions.
- 5.37 As illustrated by the density analysis above (Figure 4), York contains large tracts of land extending from the inner to the outer boundary with a lack of built development, which corresponds to and highlights the contained urban form. Despite the presence of the city and villages, the overall perception is that this is a predominantly rural landscape of open countryside. This supports the saved RSS policy to set the general extent of the outer boundary roughly 6 miles from the city centre (see Strategic Principle SP2 and SP3).
- 5.38 The land use is extensively agricultural, made up of a patchwork of low lying, predominantly arable fields, often delineated by a network of mature hedgerows and interspersed with small patches of regular-shaped mixed and coniferous plantation woodlands. Consequently, the land has a strong sense of openness. It is broadly flat with open views except for the rare areas of higher ground created by the relics of glacial moraine left behind from the retreating ice sheets which carved out the vale itself. Landscape character studies, figure ground mapping and aerial photography show that the land uses and landscape are of a singular nature and character across the whole authority with little variation except where crossed by the river corridors of the Ouse, Foss and Derwent.
- 5.39 The land provides a countryside setting to the city, with much of it being easily accessible with many recreational opportunities and a dense network of footpaths and bridleways including a number of historic long distance recreational routes including those linking York to other important historical monuments such as Beverley Minster.

### **C) Strategic Principles**

- 5.40 This review stage of the methodology has helped establish a number of strategic scoping principles related to the general extent of the York Green Belt, which are summarised below and explained further in later sections. These strategic principles inform the subsequent stages of the methodology, in particular the detailed boundary setting exercise explained in Section 8 and the approach to site assessment and selection set out in section 9.
- **SP1** - The primary purpose of the York Green Belt is to “*safeguard the special character and setting of the historic city*”.
  - **SP2** – The outer Green Belt boundary should run continuously to join up with the already defined sections of Green Belt in neighbouring authorities.

- **SP3** - The outstanding sections of outer boundary of the York Green Belt should be defined **about** 6 miles from York City centre in conjunction with the other aspects of the saved RSS policy.
- **SP4** - The starting point for scoping the detailed inner boundary should be the edge of the main contiguous urban area of York where built development meets more open land.
- **SP5** - Villages or development not entirely subsumed and/or that retain a separation from the main urban area need to be considered separately in relation to their contribution to openness.
- **SP6**– The Heritage Topic Paper Principal Characteristics set the framework for assessing overall impact and harm on the historic character and setting of the city (and examining sprawl and encroachment).
- **SP7** - The characteristics of York that are relevant to keeping land permanently open to protect the historic character and setting of the city and therefore relevant for setting the detailed boundaries of the York Green belt are:
  - a) Compactness which involves consideration of heritage topic paper and Green Belt Appraisal characteristics of the contained concentric form; the relationship between the urban edge and the countryside; the strays, Ings and Green wedges and extended Green wedges; flat terrain and views; arterial roads and open approaches; identifiable compact districts; identity and urban form of urban and rural villages; areas which prevent coalescence.
  - b) Landmark Monuments, which involves consideration of heritage topic paper and Green Belt Appraisal characteristics in particular include those of spatial, temporal or Cultural significance to the City and includes City the Minster, and structures associated with the city’s railway and chocolate manufacturing heritage as well as other designated assets. The cities Green Wedges and the long distance views from the surrounding higher ground beyond York are of particular significance to the setting of the Minster as are areas where openness contributes to the significance of more local assets.
  - c) Landscape and Setting, which involves consideration of heritage topic paper and Green Belt Appraisal characteristics in particular strays, Ings, river corridors and Green Wedges, open Approaches and views, the impression of an historic city in a rural setting, the relationship with the surrounding villages and the setting of those villages.
- **SP8** – Given the pattern and distribution of urban development within the City of York authority, the history of subsuming villages within the urban area and the need to maintain compactness and village identity, all areas on the periphery of dense development should consider their contribution to potential Sprawl
- **SP9** – Outside the clusters of built development analysis has shown that the whole of the authority area is of an open agricultural countryside nature with open views across the flat open landscape and therefore relevant to the consideration of protecting the countryside form encroachment, subject to the overall consideration of strategic principles.

- **SP10** - Where there are development needs for the authority which cannot be met within the existing urban areas of York or neighbouring local authorities, the most sustainable locations for development should be identified.
- **SP11** - Where new sites for development are identified these should be those which cause the least harm to the primary purpose of the York Green Belt and have regard to sustainability objectives expressed through the local plan strategy.
- **SP12** - York Green Belt boundaries will be created that will not need to be altered at the end of the plan period (2033).
- **SP13** - Detailed boundaries will be defined clearly, using physical features that are readily recognisable and likely to be permanent.

## Section 6: Methodology (2): Scoping Boundaries

### **a) Scoping of Outer Green Belt Boundaries**

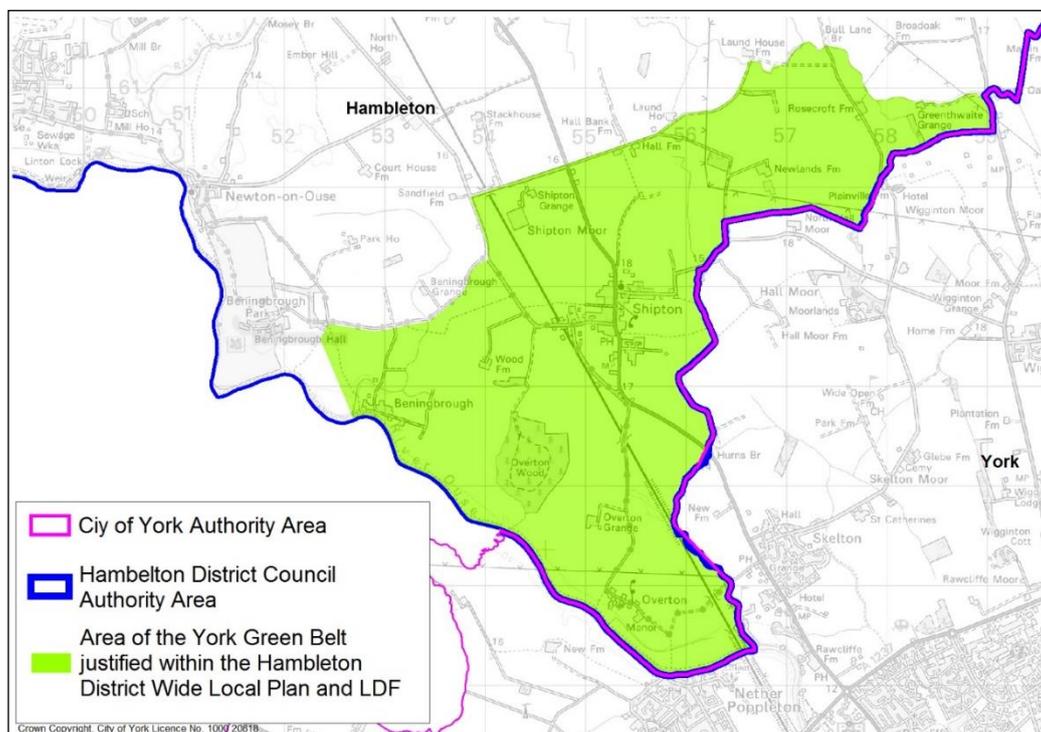
- 6.1 As policy Y1 (C) implies, the general extent of the York Green Belt already extends beyond the administrative area of York, into other local authority areas where its boundaries have already been defined, as reviewed below.

#### Existing boundary

##### *Hambleton District Council*

- 6.2 Hambleton District contains a small area of the York Green Belt at its southern fringe, which borders York. The area of Green Belt was formally established through the Hambleton District Wide Local Plan (DWLP) which has been replaced by the Local Development Framework (LDF) (fully adopted in 2010). The LDF Core Strategy identifies the York Green Belt in its glossary as an area of open land “in the south of the District, designed to check the growth of York and protect its historic form”. Policy DP9 (Development outside Settlement Limits) and paragraph 3.8.8 of the ‘Development Policies DPD’ (Adopted 26 February 2008) states that the designation from Hambleton DWLP remains valid, and is consistent with RSS Policy YH9. Hambleton District Council however, is currently reviewing its Local Plan – at this stage a Green Belt review has not commenced or been indicated.

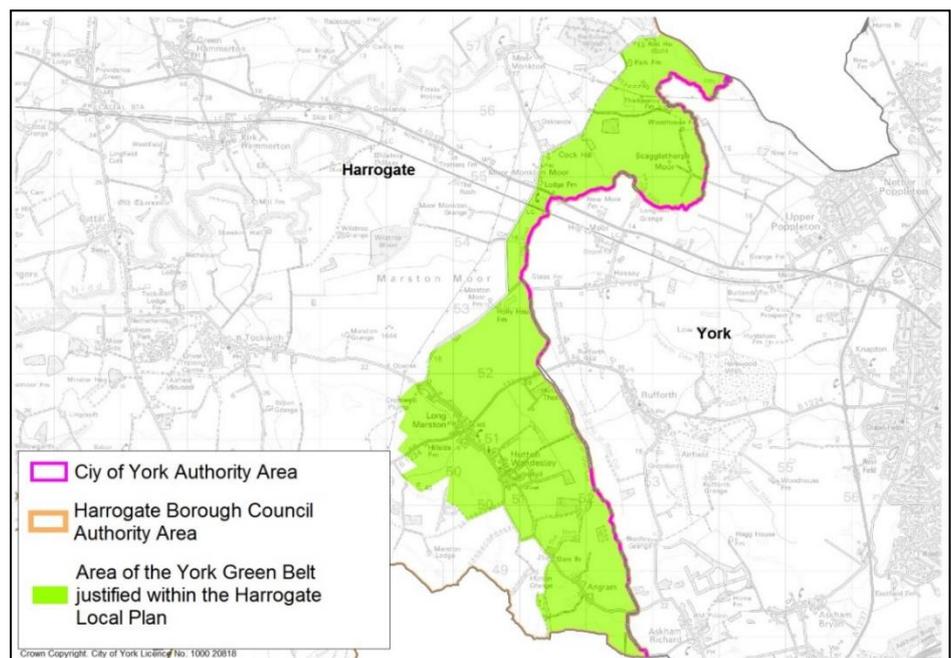
**Figure 5: York Green Belt within Hambleton District Council Area**



*Harrogate Borough Council*

- 6.3 The Harrogate Local Plan - Adopted 2001 (Augmented Composite – July 2009) formally established part of the York Green Belt in the south eastern part of its district and identifies this on the proposals map. The justification for Policy GB1 States that “*The Green Belt around the City of York was approved in principle in 1980 as part of the North Yorkshire County Structure Plan. The detailed boundary of this Green Belt has been defined through the York Green Belt Local Plan, approved by the County Council in March 1995 as interim policy for development control purposes and is expected to be formally established through the preparation of individual district-wide local plans.*” While the 1995 County Council York Green Belt Local Plan was never adopted, the Harrogate plan maintained the same boundaries and established these through the 2001 plan.
- 6.4 At the time of Submission, Harrogate Borough Council (HBC) was at examination with their new Local Plan. Harrogate adopted their Local Plan on 4 March 2020, including the extent of Green Belt set out in the previous July 2001 version.
- 6.5 As part of preparing their plan, in August 2018 HBC published a supporting document - Harrogate District Local Plan: Green Belt Background Paper Submission Update, which looked specifically at the Council’s approach to the Green Belts in its area and whether exceptional circumstances are considered to exist to warrant alteration to the Green Belt boundaries. The document considers that as the Green Belt areas of the district are part of wider sub-regional Green Belts, it is important to be aware of the approach being taken by neighbouring local authorities to reviewing the Green Belt. The Background Paper concluded that there is no necessity to undertake a review of the Green Belt at the current time as there is sufficient available, suitable and sustainable land in settlements outwith the Green Belt to deliver the level of growth planned in the district during the period to 2035.

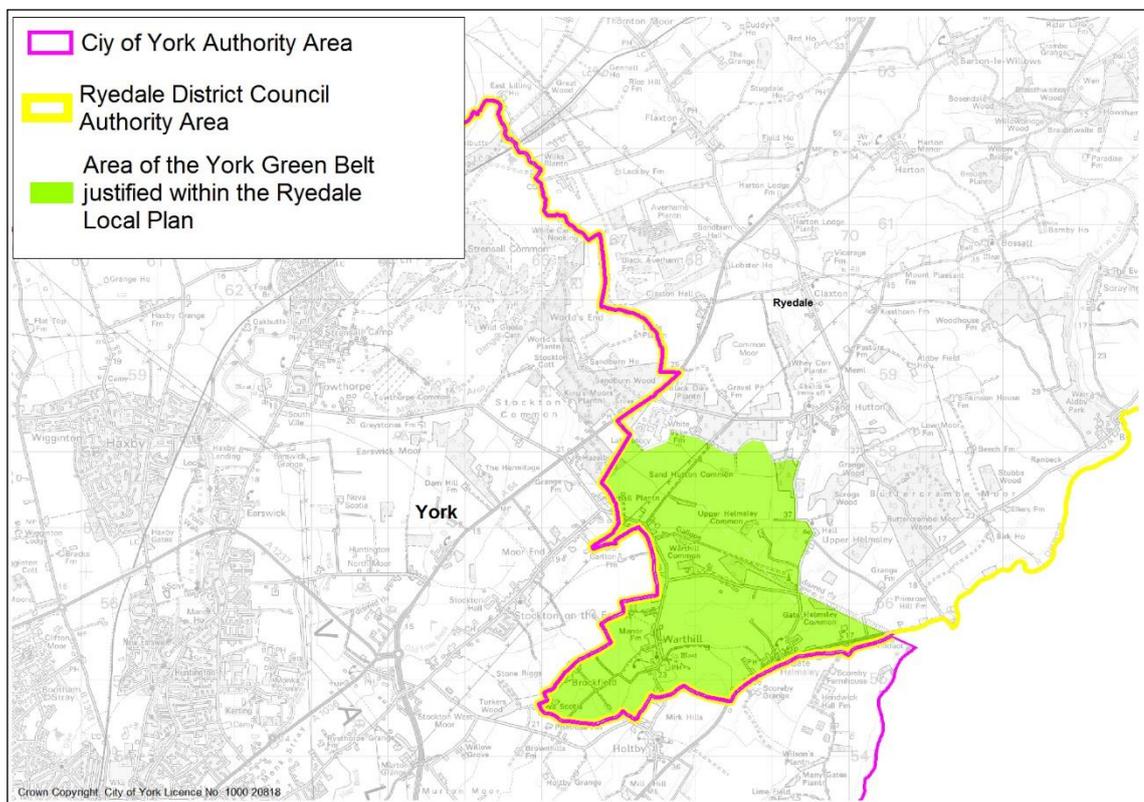
**Figure 6: York Green Belt within Harrogate Borough Council Area**



*Ryedale District Council*

- 6.6 Ryedale District Council area includes a small area of the York Green Belt at its southern extreme, bordering York. The Ryedale Local Plan (Adopted March 2002), includes a section on the Green Belt (Chapter 4), which states in paragraph 4.3.2 that the Green Belt boundary is in accordance with the Joint York Green Belt Local Plan / Southern Ryedale Local Plan Inquiry's Inspector's recommendations and takes account of the criteria in the Structure Plan Policy E8a.
- 6.7 The Ryedale Local Plan Strategy (September 2013) in Section 3 (paragraph 3.9) did not require a strategic review of the outer boundary of the York Green Belt. The outer boundary is currently defined on the adopted Proposals Map of the 2002 Ryedale Local Plan.

**Figure 7: York Green Belt within Ryedale District Area**



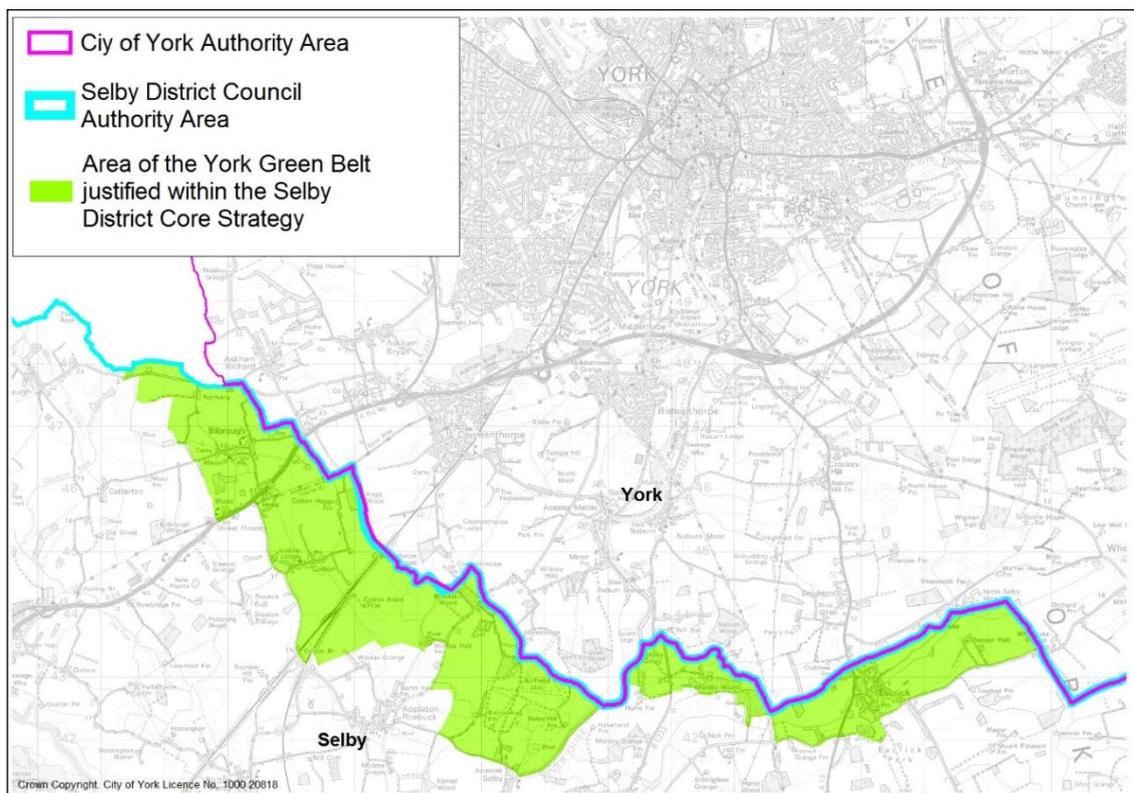
*Selby District Council*

- 6.8 Selby District Council contains parts of both the York Green Belt and the West Yorkshire Green Belt within its boundaries. Paragraphs 4.46 – 4.52 of the 'Selby District Core Strategy (Adopted October 2013)' considers the potential for a review of the Green Belt boundary, if sufficient deliverable / developable land outside the Green Belt cannot be found in those settlements to which development is directed in accordance with the settlement hierarchy and if development in alternative, non-Green Belt settlements / locations is a significantly less sustainable option (because the needs of the particular settlement to which the development is directed outweigh both the loss of

Green Belt and any opportunity for that development to take place on non-Green Belt land elsewhere). A Green Belt review will also consider identifying Area of Safeguarded Land to facilitate future growth beyond the Plan period. Selby District Council considers that this constitutes the exceptional circumstances that justify a need to strategically assess the District's growth options across the Green Belt.

- 6.9 In Spring 2015, Ove Arup and Partners were appointed by Selby District Council to prepare 'A Study of Green Belt, Strategic Countryside Gaps, Safeguarded Land and Development Limits' as part of the evidence base for the Selby plan.
- 6.10 Selby District Council is currently preparing a new Local Plan. Issues and Options consultation was held between January and March 2020. The new Local Plan will plan for development in the district to 2040. The plan will set out a vision and framework for future growth of the district, identifying where new housing, employment and other development will be located. The Local Plan will also set out policies which the Council will use to determine planning applications and, once adopted, will replace the Selby District Core Strategy Local Plan (2013) and those policies that have been 'saved' from the Selby District Local Plan (2005).

**Figure 8: York Green Belt within Selby District Area**



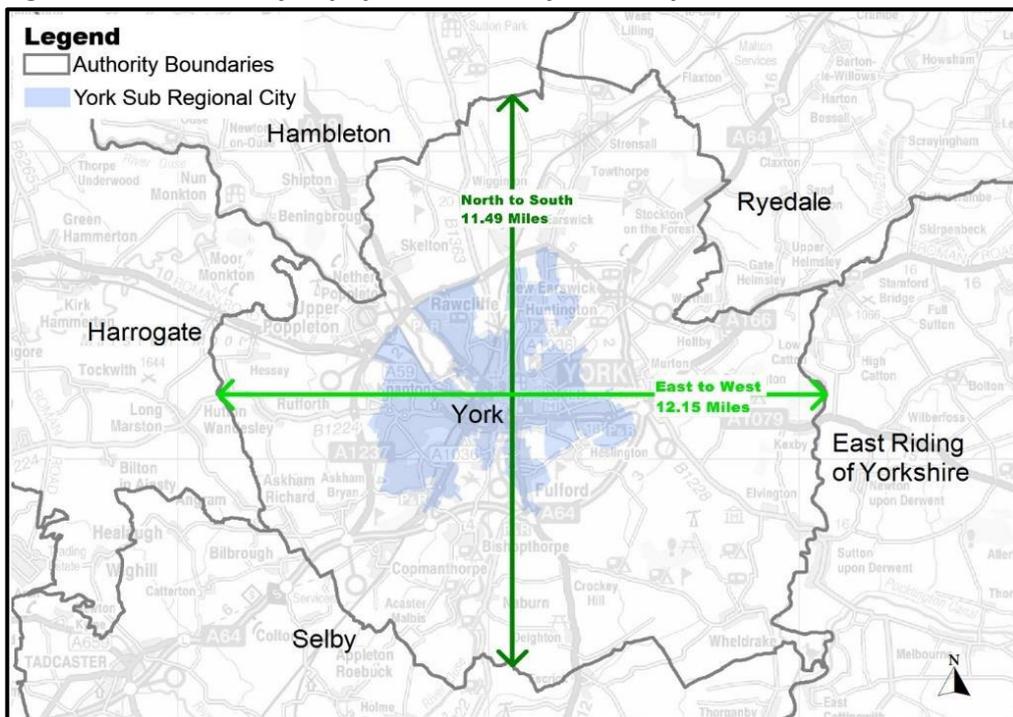
Outstanding Areas

- 6.11 It is accepted that where neighbouring authorities have adopted areas of the York Green Belt in their development plans, these areas are already established, and therefore have not formed the basis of any analysis through

this document or the York Local Plan. Land beyond York’s administrative boundary in the East Riding or Hambleton, Ryedale or Selby district authority areas, which are not illustrated on the above plans, have not been identified as serving a York Green Belt function. It is not within the scope of this evidence to be able to assess further areas outside of the authority boundary.

- 6.12 In order to establish a logical and continuous York Green Belt, the scoping for the outer Green Belt boundary has therefore proceeded on the basis that it should run continuously to join up with the already defined sections of Green Belt in neighbouring authorities and seek to connect these adopted areas in a logical way in line with York Green Belt SP 2 (i.e. the outer Green Belt boundary should run continuously to join up with the already defined sections of Green Belt in neighbouring authorities). These other boundaries provide the starting point for evaluation of the outer limits of the York Green Belt in the remaining areas. The remaining potential outer edges to the York Green Belt which do not directly abut adopted limits, have been evaluated within the York authority area so that they can connect up to the previously adopted limits.
- 6.13 When considering the requirement to define the outer boundary in line with the saved RSS policies to “*about 6 miles*” from the city centre, it was firstly established that York is 12 miles from North to South, and 12 miles from East to West, as illustrated in Figure 9. Thereby giving the authority area an approximate 6 mile radius around a general central city focus.

**Figure 9: Dimensions of City of York Authority boundary**



- 6.14 The assessment for the outer boundary proceeded in line with York Green Belt SP3 (i.e. the outstanding sections of outer boundary of the York Green Belt should be defined about 6 miles from York City centre in conjunction with the other aspects of the saved RSS policy), on the basis that when applying

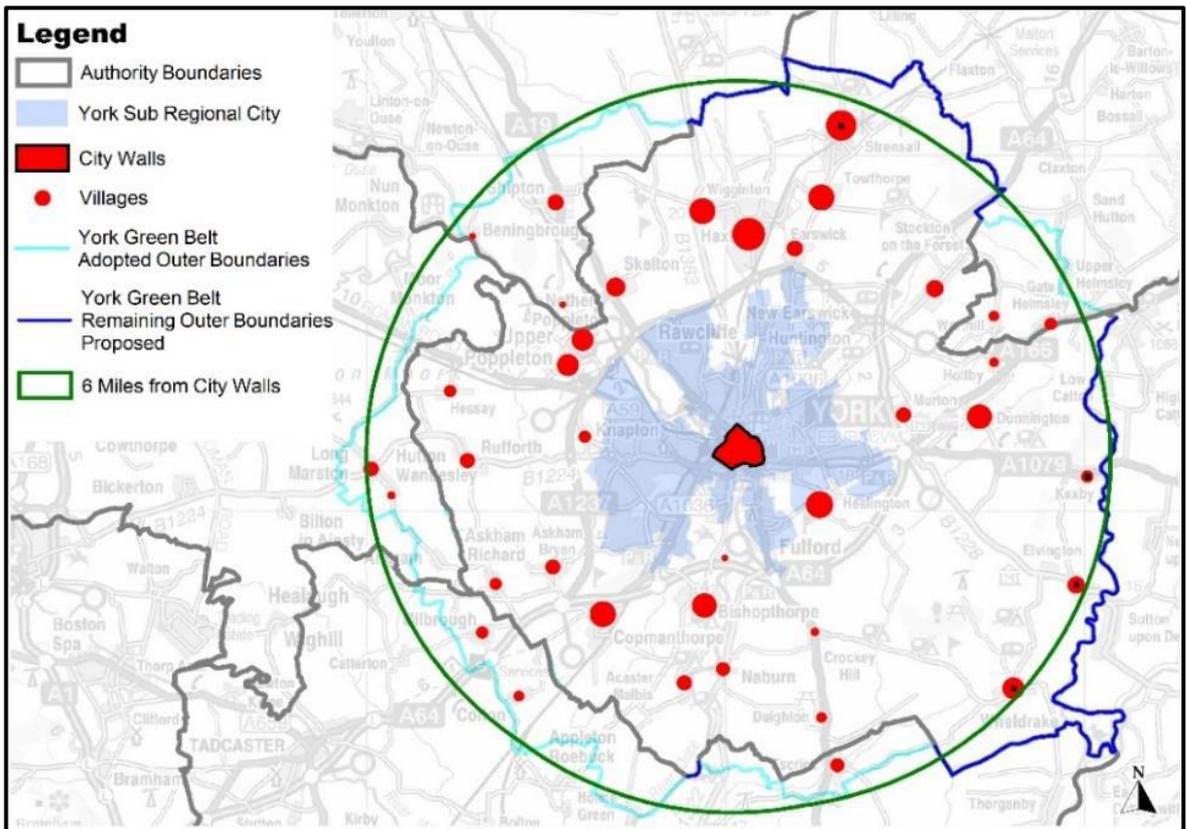
the requirement to define a boundary, the methodology should not mechanically apply a simple 6-mile distance from a central point or area, but take into the requirements of saved RSS policy Y1(C) and the characteristics of land beyond a simple 6 mile measurement, along with the connection points to established Green Belt boundaries. This flexibility means the approach is not prescriptive and allows the Council to define a boundary having regard to requisite policy requirements of the saved RSS policy and the NPPF 2012 (including paragraph 85). As discussed at the Phase 1 hearing sessions and in the Green Belt Clarification Note [EXCYC39], it was therefore considered appropriate to include land which lay beyond a strict 6-mile distance from the city where this is not readily distinguishable from other land falling within the 6-mile distance and can be regarded as strategically important in Green Belt terms.

- 6.15 As set in section 5b above, the key evidence to assessing areas of importance of the character and setting of the historic city are the Green Belt Appraisal (and subsequent updates) and the Heritage Topic Paper [SD103]. The Heritage Topic Paper states that the character of York is “*defined by ancient arterial roads and commons, the river valley, and the pattern of villages set within a predominantly flat landscape of pasture, arable woodland and wetland*” (para 2.4). In line with York Green Belt Strategic Principle 6 (SP6), it also establishes the relationship of the historic city to the surrounding settlements as a key character element of the city (page 63) and explains the importance of the landscape setting of villages (para 5.84).
- 6.16 The proposed York Green Belt outer boundaries that extent beyond a strict 6 mile distance are those which are in proximity to the villages of Strensall, Elvington, Wheldrake and Kexby as presented in Figure 10. The villages themselves are within 6 miles of the city. The compactness of these villages (SP6a) and open views between them to the city, well as their landscape and setting (SP6c) are considered to be important as part of the nested landscapes of the historic city of York, and therefore as part of the York Green Belt, as land which needs to be kept permanently open to protect the setting and special character of the wider city landscape and setting. Additionally, the parish boundaries associated with these villages have a longstanding historical linkage to the villages themselves and also correlate with the administrative boundary creating a joined up approach to linking the adopted areas in neighbouring authorities. Taken together, this provides the scope for outer boundary analysis as presented in Figure 11.
- 6.17 The Inspectors have accepted that, subject to the consideration of the detailed boundary, the above broad approach taken by the Council was justified, finding that the extent of divergence from a strict 6-mile limit was very limited; and that the outstanding sections do not converge considerably from the broad depth of the Green Belt boundaries formed by the established boundary sections with which the outstanding sections have been linked<sup>5</sup>.

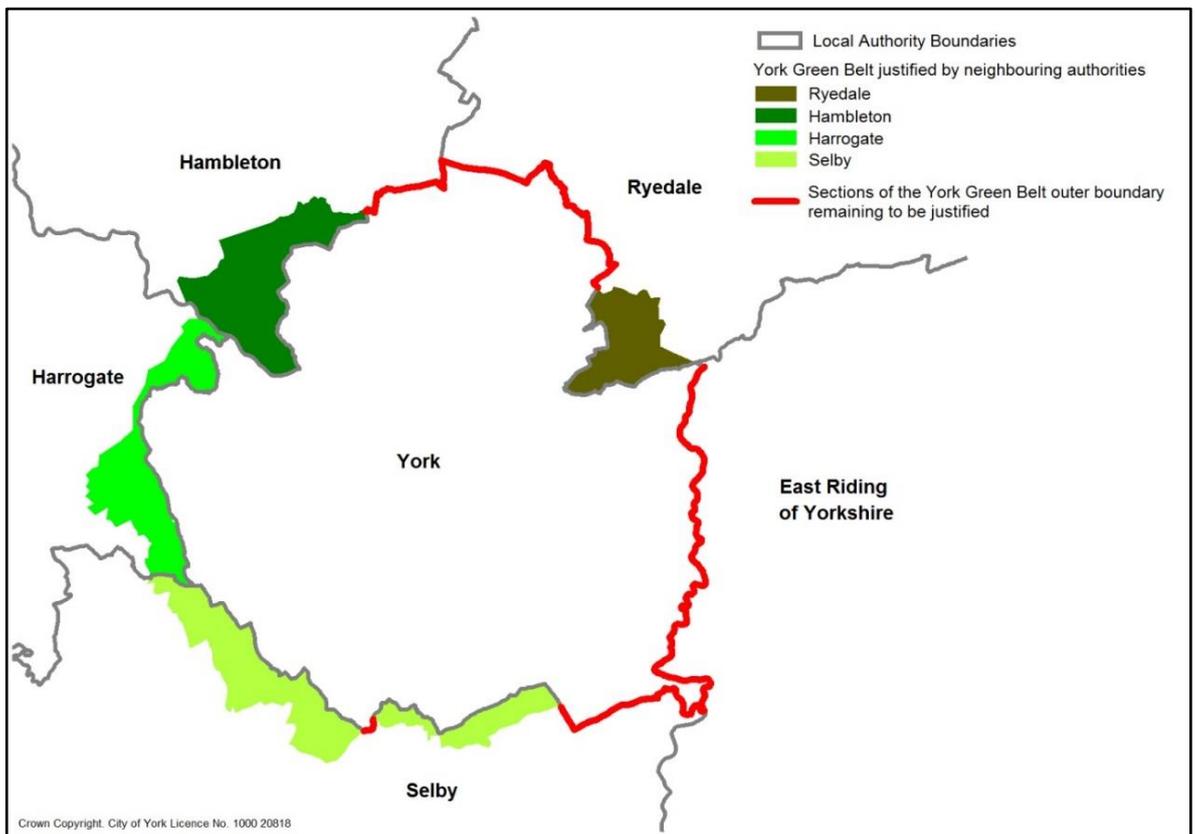
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<sup>5</sup> see paragraphs 16-17 of the Inspectors’ letter [EXINS15]

**Figure 10: Proximity of York Villages to Six Miles from City Walls**



**Figure 11: The Scope of the Outer Limits of the Green Belt in York**



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- 6.18 Annex 2 considers the detail of the Outer York Green belt boundary within the York Authority area and identifies boundaries in relation to the purposes of Green Belt in line with the methodology set out in Section 8 and the long term development limits, for establishing a permanent Green belt, as set out by sections 9 and 10.

**b) Scoping of Main Urban Area Inner Green Belt boundary**

- 6.19 Policy YH9 requires the inner boundary to be defined to establish long-term development limits that safeguard the special character and setting of York and distinguish land that needs to be kept permanently open to meet the purposes of Green Belt.
- 6.20 In understanding where long-standing development limits should be set, it was necessary to understand the extent of the built up areas of York, as this would need to be considered when setting the inner boundary, having regard also to evidence about the historic character and setting of the City and the need to demonstrate the extent to which development had been channelled to urban areas.
- 6.21 Built up areas in the York local authority include the main York urban area, villages, industrial estates, hamlets, farmsteads, rural business parks, small groups of dwellings and isolated businesses/dwellings. However not all of these require to be inset from the Green belt as part of the inner boundary setting exercise, as some are integral to the Green Belt and do not detract from its openness.
- 6.22 Strategic principle SP4 identifies the starting point for scoping the York Green Belt detailed inner boundary should be the edge of the main contiguous urban area of York where built development meets more open land. The density analysis carried out identified that this contiguous area was confined within the limits of the York Outer Ring Road as illustrated at Figure 12.

***Figure 12: The Scope of the Main Urban Area Limits of the Green Belt in York***



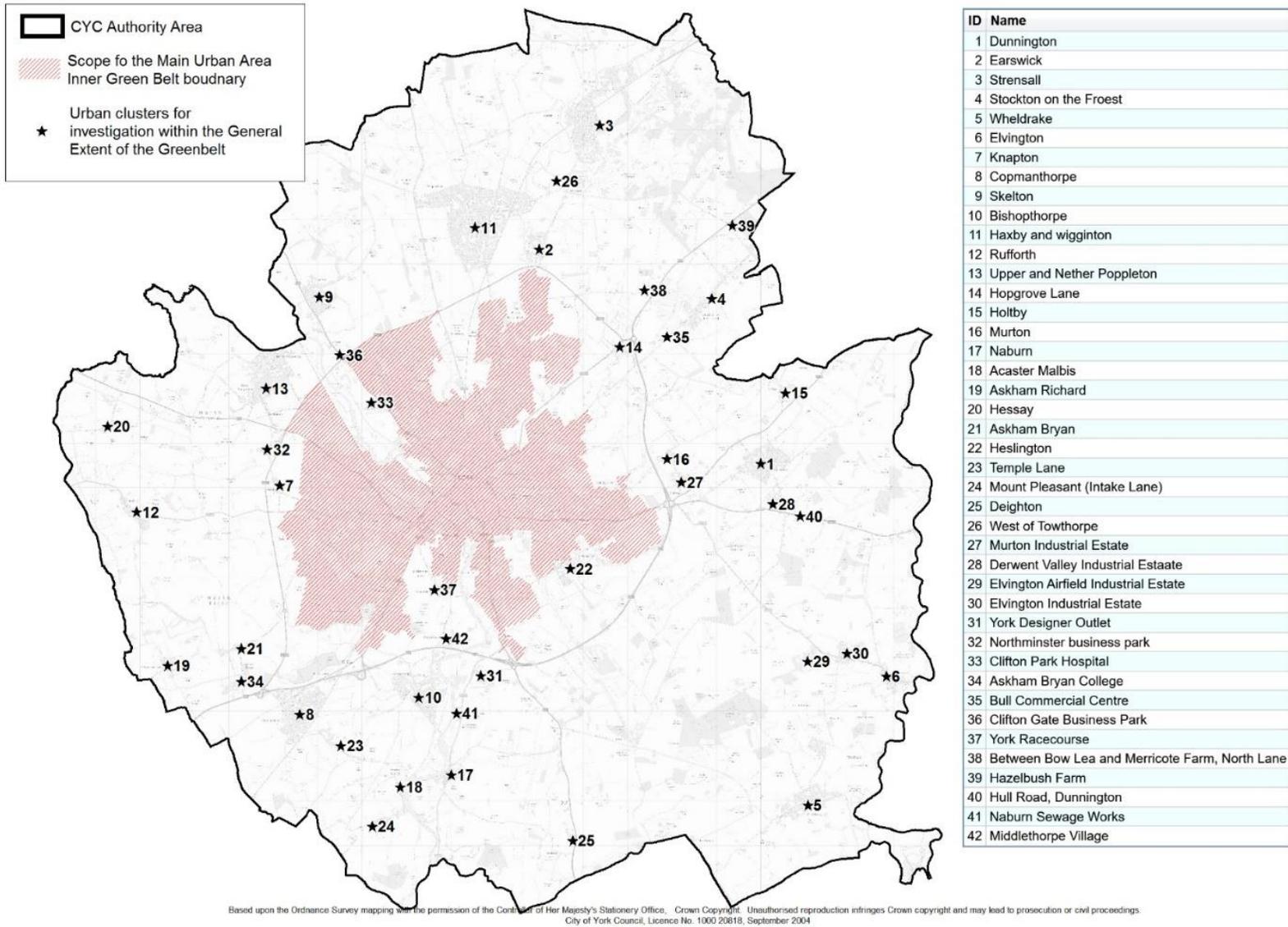
6.23 Annex 3 considers the detail of the inner Green belt boundary to the Main York Urban area and identifies boundaries in relation to the purposes of Green Belt in line with the methodology set out in Section 8 and the long term development limits, for establishing a permanent Green belt, as set out by sections 9 and 10.

### **c) Scoping of other Urban Areas in the General Extent of the Green Belt**

6.24 Strategic Principle SP5 identifies that villages or development not entirely subsumed and/or that retain a separation from the main urban area need to be considered separately in relation to their contribution to openness.

6.25 As set out in Figure 4 (Section 5), GIS analysis identified clusters of higher density development. A total of 42 “structure clusters” were identified for investigation (inclusive of the Designer Outlet and Clifton Gate Business Park identified through Local Plan consultations) and presented in Figure 13.

Figure 13: Urban areas identified for investigation within the General Extent of the Greenbelt



## **Assessing Open Character and the Contribution to the Openness of the Green Belt**

- 6.26 There are two aspects of paragraph 86 to consider in determining the degree of openness and contribution to the green belt that a village or urban area makes. First, whether the urban area has an open character, and secondly, whether this open character makes an important contribution to the openness of the Green Belt. Fulfilling the first part of the paragraph and exhibiting a somewhat open character does not necessarily justify a village/area being included within the Green Belt and being governed by its policies.
- 6.27 Within the analysis, the description of the character of an area approaches the first part of paragraph 86 by considering the degree of openness, taking the following factors in to account:
- density of built/residential development as a whole and how this differs (or not) across the area;
  - extent of developed land;
  - scale and form of development and whether, and (and if so) how, this changes across the area taking into account types of dwellings, plot sizes and building heights; extent of open space or gaps in frontages; distinction between the built-up character of the area and surrounding open land; and topography and the presence of trees and hedgerows.
- 6.28 The analysis then considers the second part of paragraph 86 within its description of the character of an area by assessing whether an open character contributes to the openness of the Green Belt, by taking these extra considerations into account:
- the relationship between open or private amenity areas on the edge of or within the area and the surrounding Green Belt – for example whether open countryside comes in to the area and whether open areas within the area are continuous with surrounding open agricultural or recreational land;
  - the open/rural aspect of dwellings/buildings within the area; and
  - views into and out of the area along its periphery and whether views in/out are restricted and/or obscured.
- 6.29 The assessment is included at Annex 4. In some cases, the degree of openness or the contribution openness makes to the Green Belt is not uniform. In these cases, planning judgement has been applied to make a judgement based on the context of available evidence and site visits where necessary. A conclusion has been drawn in each case as to whether an area should be included or inset from the general extent of the Green Belt and is summarised in Table 1.

**Table 1: Included and Excluded Urban Areas**

<b>Urban Areas</b>	
<b>Excluded from GB</b>	<b>Included in GB</b>
Bishopthorpe	Acaster Malbis
Copmanthorpe	Askham Bryan
Derwent Valley Industrial Estate	Askham Bryan College
Dunnington	Askham Richard
Earswick	Bull Commercial Centre
Elvington	Clifton Gate Business Park
Elvington Airfield Industrial Estate	Clifton Park Hospital
Elvington Industrial Estate	Deighton
Haxby/Wigginton	Drome Road/Temple Lane
McArthur Glen Designer Outlet	Hazlebush Farm
Murton Industrial Estate/ York Auction Centre	Heslington
Northminster Business Park	Hessay
Rufforth	Hull Road - East of Derwent Valley Industrial Estate
Skelton	Knapton
Stockton on the Forest	Middlethorpe
Strensall	Holtby
Upper/Nether Poppleton	Hopgrove Lane
Wheldrake	Mount Pleasant
	Murton
	Naburn
	Naburn Sewage Works
	North Lane
	Towthorpe
	York Racecourse

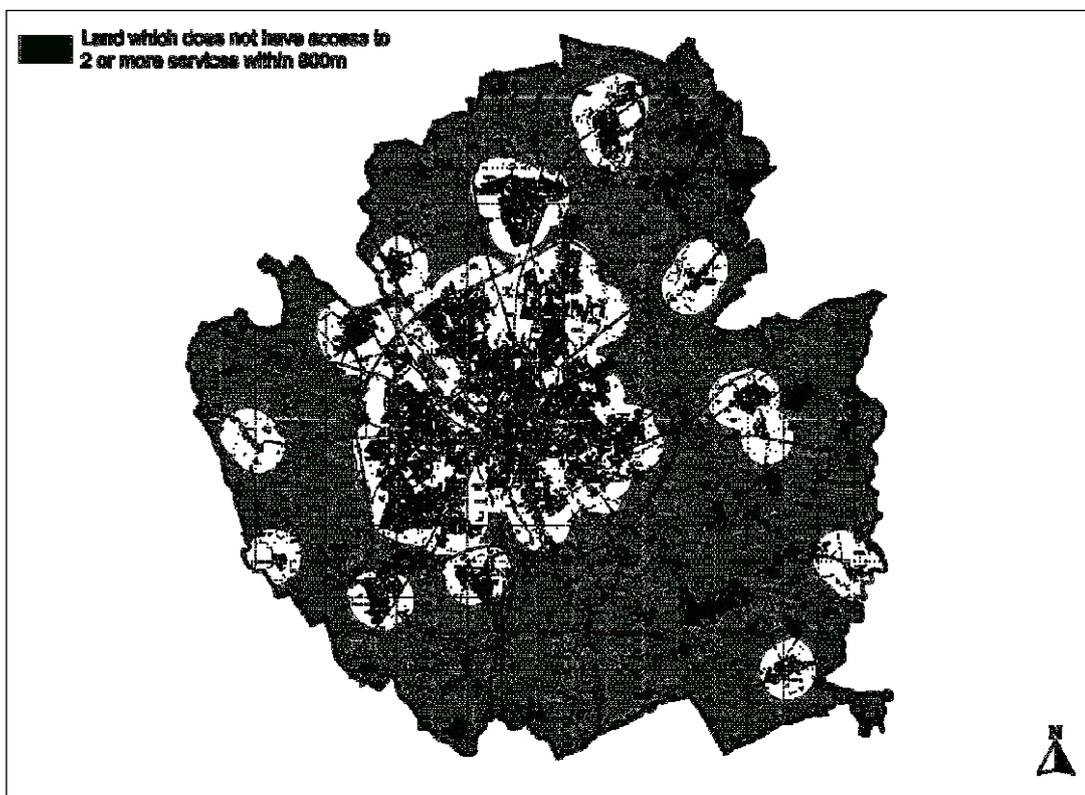
6.30 Annex 4 considers all of the urban areas listed in Table 1. Where inseting urban areas from the York Green Belt has been deemed necessary, this annex also identifies detailed boundaries in relation to the purposes of Green Belt in line with the methodology set out in Section 8 and the long term development limits, for establishing a permanent Green belt, as set out be sections 9 and 10.

## Section 7: Methodology (3): Channelling Development to Urban Areas, other settlements and beyond the Green Belt

### a) Introduction

- 7.1 Paragraph 84 of the NPPF advises that when drawing up Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development, in particular by considering the consequences of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages within the Green Belt or towards locations beyond the outer Green Belt boundary. This aligns with the Local Plan Strategy (See Sections 4 and 9).
- 7.2 This section explains how the Council has sought to maximise development potential within urban areas, which include the main urban area and other built up clusters identified as part of the urban areas analysis explained in Sections 5 and 6. It has done so recognising that development in the main urban area in particular is considered to offer the best opportunities for building on brownfield land. Land within the main urban area in particular, as well as in some of the other surrounding villages, is generally accessible to existing sustainable services or facilities as broadly illustrated in Figure 4 below, which shows the areas in white as those which have access to 2 or more services within 800m.

*Figure 14: Access to services*



- 7.3 This section then identifies the shortfall in meeting needs within the existing urban areas as well as the opportunities for meeting needs beyond the Green Belt, as these considerations have informed where the boundaries should be set.

## **b) Maximising Development Potential within Urban Areas**

### **Introduction**

- 7.4 The identification and optimisation of urban area potential has been inherent in both the assessment of sites and the policy approach in the Publication Draft Local Plan to ensure delivery within the plan period to 2033 a minimum of:
- 13,152 homes against a housing requirement of 822 dpa based upon the 2017 based housing trajectory;
  - 3 Gypsy and Traveller pitches, 3 Travelling showpeople pitches and 44 additional pitches for those who do not meet the definition; and
  - 650 jobs per annum and in total 180,170 sqm of employment land as per the Employment Land Review and economic forecasting.
- These figures are those based on the updated housing trajectory [EXCYC16] and evidence originally submitted with the plan for examination, which has been amended as per annex []; however the trajectory updated in the Annex makes no material difference to the conclusions drawn in the report on the potential for development in the urban areas and the consequent setting of Green Belt boundaries.
- 7.5 The Council has sought to ensure that a **wide range of sites have been identified and assessed** for their potential uses through the 2012 Call for sites and Site Selection process [SD015, SD018, SD072, SD073]. The Council took a proactive approach to identifying potential sites for all types of Development, including an extensive call for sites, re-examining extant housing and employment permissions as well as former allocations and vacant industrial land.
- 7.6 Although the national threshold for site identification is 0.25ha, the Council lowered this threshold for identifying sites to 0.2 ha and above in order to consider as many opportunities for development as possible and to recognise the contribution that small sites can make to overall supply. This includes identifying sites from the following sources of supply:
- sites submitted through the “Call for Sites” consultation and subsequent Local Plan consultations;
  - extant housing and employment planning permissions;
  - former allocations which have not been developed out;
  - for employment only - infill on existing business parks and industrial estates.
- 7.7 The Council has also prioritised the NPPF’s requirement to ensure deliverability and therefore only considered sites which had a willing land

owner or had previously been considered for this development use, giving greater certainty over delivery. Ongoing monitoring of this informs updates on delivery and timescales.

## **Employment**

- 7.8 In addition to identifying new sites through the call for sites process, land on existing employment and business parks was specifically considered in terms of its potential to deliver further employment floorspace in these brownfield locations.
- 7.9 The **optimisation of employment development density** has been inherent in both the assessment of sites and the policy approach in the Publication Draft Local Plan. Different types of business activity require different building types and site layouts, both of which affect the way a site is used and how much development can be accommodated on a specific site, and the gross site area that can accommodate buildings will depend to an extent on the type of business use. Taking the two extreme cases – B1a offices intensively occupy sites with multi storey building and some land allocated for car parking, whereas a warehouse use is usually a single storey building with extensive manoeuvring space for large HGVs.
- 7.10 The baseline assumptions for employment use plot ratios are set out in the Employment Land Review (2016, [SD064]). These range from 40% to 80% density in accordance with employment type. The Publication Draft Local Plan Policy EC1 allocates employment sites with floorspace quanta which account for development location and type to maximise urban potential.

## **Housing (including Gypsy traveller and travelling showpeople)**

- 7.11 **Windfall** sites, as defined in the NPPF (2012) are: *“Sites which have not been specifically identified as available in the Local Plan process – they normally comprise previously developed sites that have unexpectedly become available”*. These unidentified sites are typically not known within the Strategic Housing Land Availability Assessment (SHLAA) and the likely quanta of delivery from such sites are best understood through historic trends.
- 7.12 The Council has assessed the trends in the historic rate of windfall delivery including changes of use and conversions across the entirety of City of York Council area. Analysis of housing completion figures indicates that, historically, a considerable element of York’s housing supply (more than half of all completions during the last 10 years - 2007-2017) has been provided through windfall sites. The analysis is set out in the Windfall Allowance Technical Paper produced in July 2016 [SD055] as part of the evidence base to support the City of York Local Plan Preferred Sites Consultation. This paper has subsequently been updated to 1st April 2017 and is included at Annex4 to the SHLAA [SD049A].

- 7.13 The 10 year trend for windfalls on sites which are below the 0.2ha threshold is 169 dwellings per annum. This is projected forward from year 3 of the housing trajectory to ensure that there is no double counting with extant permissions. This supply from projected windfalls provides a supply of 3,042 dwellings over the full plan period to 2038. The inclusion of a qualified allowance for windfalls within the Local Plan's housing supply trajectory serves to minimise the need for new Local Plan allocations within the general extent of York's green belt.
- 7.14 The windfall assessment [see SD049] considers that this projection may be a conservative estimate, as analysis identifies increasing trends over both the longer and shorter term for conversions and changes of use completions. In light of substantial numbers of unimplemented consents from this source of housing supply, permitted development rights relating to office conversions being made permanent, and new permitted development rights allowing the demolition and rebuilding of "vacant and redundant" office and light industrial buildings into dwellings, without planning permission (Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020), there is a qualified anticipation that this upward trend could well continue.
- 7.15 The **optimisation of densities** has been inherent in both the assessment of sites and the policy approach in the Publication Draft Local Plan. Densities reflecting different locations and public transport accessibility have been used in the viability assessment of potential sites. The Local Plan Viability Study (draft 2014 [SD125] updated 2018 [CD018]) set out an archetype approach to determining housing numbers on sites less than 5ha (non-strategic sites). These assumptions reflected different locations of sites (city centre/city centre extension, urban, suburban and village/rural) and the size of site (large, medium and small). For strategic sites (over 5ha) a predominantly bespoke approach is taken to reflect the site characteristics and detailed work undertaken, such as master planning.
- 7.16 The Publication Draft Local Plan Policy H2 (Density of Residential Development) sets out differential net densities to ensure the efficient use of land and help maintain local services and public transport provision. The density requirements in Policy H2 reflect different density zones and distances from high frequency public transport corridors. Local Plan policy is guided by ongoing monitoring of housing delivery, to identify trends and inform strategy. Monitoring of housing density delivered over the preceding 10-year period shows<sup>6</sup> that development density in the City Centre and Urban zones has remained consistently high (City Centre:119 dwellings per hectare (dph) / Urban zone: 50 dph).
- 7.17 To optimise development density citywide, Local Plan Policy H2 sets challenging targets across all housing zones; in the sub-urban zone (including Haxby and Wigginton) this sets a plan target of 40 units/ha against a 10 year

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<sup>6</sup> CYC Monitoring 2008/9 to 2017/18. Data relates to sites of 0.2ha or greater (the threshold for allocations), excludes conversion/change of use, and includes all purpose built, privately managed student accommodation (cluster units).

average of 31 dph. Similarly, in York's rural area and villages the Plan proposes a target of 35 units/ha against 10 year trends showing around 12 dph.

- 7.18 The call for sites 2012 and subsequent site selection process invited opportunities for willing landowners to submit sites for gypsy, traveller and travelling show people in sustainable locations. The Council have also examined the intensification of capacity on the existing local authority sites (all within the existing urban area) and sites known to hold temporary planning consent for this use.
- 7.19 The Plan makes provision for Gypsies and Travellers through policy H5 [CD001], which identifies that provision will be met through safeguarding existing supply and meeting future needs:
- through the provision of 3 additional pitches within the existing three Local Authority sites (Layerthorpe, Clifton and Osbaldwick) to meet defined Traveller need;
  - through strategic site allocations (sites over 5 ha), whether on-site, on alternative land or through providing commuted sum payments to the development of pitches elsewhere; this is to accommodate the 44 Gypsy and Traveller households that do not meet the Planning definition.  
Provision on Strategic sites is based on the following hierarchy:
    - 100 - 488 dwellings: 2 pitches to be provided
    - 500 - 999 dwellings: 3 pitches to be provided
    - 1000 - 1499 dwellings: 4 pitches to be provided
    - 1500 - 1999 dwellings: 5 pitches to be provided
    - 2000 or more dwellings: 6 pitches to be provided
- 7.20 Similarly, The plan makes provision for travelling showpeople through policy H6:
- through safeguarding existing supply;
  - through the provision of 3 additional plots to meet defined travelling showpeople needs;
  - through provision of travelling showpeople yards within existing and allocated employment sites provided it will not lead to a loss of land needed to meet employment needs over the plan period.

## **Education**

- 7.21 Over the past 10 years there has been a small decrease in the number of schools in York due to reorganisation and amalgamation of infant and junior schools into all-through primary schools. This has led to an intensification of land use on existing school sites.
- 7.22 Policy ED6 'Preschool, Primary and Secondary Education' seeks to ensure that sufficient facilities are provided commensurate to the population of new development. Background evidence undertaken in conjunction with education colleagues helped to define the likely requirements as a result of development allocations across the city. This is set out in the Infrastructure Delivery Plan

(IDP) (paragraphs 4.133-4.148 and Appendix 1 [SD128]) and consists of either development to increase capacity or a commuted sum payment.

- 7.23 Where a specific need for an educational establishment has been identified as a result of strategic site development, this has been included into the bespoke strategic site policy principles against which the sites are expected to deliver (Local Plan Section 2 [CD001]). This includes urban allocations: ST1 'British Sugar' and ST5 'York Central'.
- 7.24 Policies within the plan also supports the co-location of community facilities such as built sport and schools (policy HW3). This seeks to maximise access and land efficiency and to ensure agreements for wider community access to existing sports and cultural facilities on all education sites (Policy ED8). Multi-functional use of open spaces associated with education provision helps to maximise urban opportunities.
- 7.25 The capacity of existing higher education sites have been assessed for their potential to meet future needs as follows:
- *York College* has limited capacity for further development at without further land being identified for growth;
  - *York St John University* has potential for further intensification of development identified at the existing Campus (policy ED4);
  - *University of York* has potential for further intensification / redevelopment at the existing Campus West (Policy ED2) subject to not exceeding the 23% footprint total site area. There is also remaining undeveloped permitted capacity at University of York Campus East (policy ED3) wherein development the development footprint should not exceed 23% of the 65ha allocated for development.
  - *Askham Bryan College* is a rural college, which is not considered to be within the urban area and is anticipated to have the capacity to meet its needs without the need to reduce openness.
- 7.26 Some University land allocations have historically included the provision of student accommodation. While on-campus provision is preferred as set out in policy ED1 [CD001], assessment of on-campus need should take into consideration the capacity of independent providers of bespoke student housing in the city to provide accommodation. Over recent years, the quantum of provision has increased to meet the needs of the student population in the city.

### **c) Identifying urban supply and shortfall**

#### **Introduction**

- 7.27 Based on Section 4, para 7.4 identified the need for York to deliver within the plan period to 2033 a minimum of:

- 13,152 homes against a housing requirement of 822 dpa based upon the 2017 based housing trajectory;
- 3 Gypsy and Traveller pitches, 3 Travelling showpeople pitches and 44 additional pitches for those who do not meet the definition; and
- 650 jobs per annum and in total 180,170 sqm of employment land as per the Employment Land review and economic forecasting.

7.28 This section identifies how much of the land uses can be accommodated within the urban area and what the shortfall in supply is to enable the city to meet its identified needs.

7.29 In order to establish a Green Belt which will not need to be altered at the end of the plan period, needs have been assessed to accommodate a minimum growth up to 5 years beyond this date, as set out in section 4. These needs must be considered against the existing urban area capacity and the need to allow flexibility in supply in order to identify the shortfall of how much additional land needs to be identified, beyond the existing urban area, in order to ensure a permanent Green Belt.

### **Employment Development**

7.30 The ELR (2017) [SD063] has established a need for 180,170 sqm of employment floorspace to be delivered within the plan period to 2033, as set out in Section 4.

7.31 To ensure appropriate flexibility in the employment land requirements for a Green Belt, which will not need to be altered at the end of the plan period, the average land requirements identified in the ELR to provide 650 jobs pa, were projected forward by 5 years to 2038. Requirements projected to 2038 identified an additional requirement for 31,094sqm/6 ha to create a total need of 211,264 sqm/ 34.3 ha of employment land for Business uses (B1/B2/B8) and 231,239 sqm/38.1 ha overall (inclusive of B uses and D2 uses). This is a net requirement taking consideration for:

- Planning permission and between 2012- 2017;
- A vacancy factor of 5%; and
- And an additional 2 years supply

The vacancy factor and additional two years flexibility is built into the requirement to support and allow for choice and churn within the employment sector.

7.32 The ELR (2017) [SD063] has identified that the **capacity within the urban area for the provision of employment land is 108,877 sqm** through suitable, available and deliverable sites. The sites that provide this capacity are listed in Table 2.

**Table 2: Identified Employment sites within Urban areas outside of the green belt (existing main urban area, villages and industrial locations considered) and identified shortfall**

Location	ALLOCATION	SITE NAME	Site size (ha)	Potential Employment SQM
Urban	ST5	York Central	35.0	100,000 sqm
Urban	E8	Wheldrake Industrial Estate	0.45	1485 sqm
Urban	E9	Elvington Industrial Estate	1	3,300 sqm
Urban	E10	Chessingham Park, Dunnington	0.24	792 sqm
Urban	E11	Annamine Nurseries, Jockey Lane	1	3,300 sqm
<b>Total</b>				<b>108,877 sqm</b>
Total Employment requirement for enduring Green belt: 2017-2038				231,239 sqm
<b>Shortfall</b>				<b>122,363 sqm</b>

7.33 This identifies a shortfall of 122,362 sqm of employment land which needs to be accommodated on additional land outside the existing urban areas, to ensure a Green Belt which will not need to be altered within at least 5 years beyond the plan period.

### **Housing Development needs**

7.34 Based upon a housing requirement of 822 dpa (790 dpa OAN + 32 dpa shortfall), the authority needs to deliver 13,152 homes over the plan period to 2033, as established in Section 4.

7.35 To ensure appropriate flexibility beyond the plan period to meet land requirements for a Green Belt, which will not need to be altered at the end of the plan period, the identified objectively housing need identified (790 dpa) has been projected forward for 5 years to 2038. Overall, this identifies a requirement for the authority to deliver a further 3,950 dwellings to deliver 17,102 dwellings overall, inclusive of a 32 dpa shortfall per annum between 2017 and 2033.

7.36 In identifying suitable, available and deliverable sites for development through the SHLAA [SD049] the **capacity within the urban area provides for 5798 dwellings during the plan period to 2033. Additionally, a further 700 dwellings will be delivered beyond the plan period to 2038 providing 6498 dwellings within the urban area in total.** The sites that provide this capacity are listed in Table 3.

**Table 3: Housing sites within urban areas outside of the Green belt (existing main urban area, villages and industrial locations considered) and identified shortfall**

Location	ALLOCATION	SITE NAME	Site size (ha)	Potential Residential Units		
				Delivery in Plan Period	Beyond plan period to 2038	Total (2017-2038)
Urban	H1	Former Gas Works, 24 Heworth Green	3.54	336	0	336
Urban	H3	Burnholme School	1.90	72	0	72
Urban	H5	Lowfield School	3.64	162	0	162
Urban	H7	Bootham Crescent	1.72	86	0	86
Urban	H8	Askham Bar Park & Ride	1.57	60	0	60
Urban	H10	The Barbican	0.96	187	0	187
Urban	H20	Former Oakhaven EPH	0.33	56	0	56
Urban	H22	Former Heworth Lighthouse	0.29	15	0	15
Urban	H23	Former Grove House EPH	0.25	11	0	11
Urban	H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	0	104
Urban	H52	Willow House EPH, Long Close Lane	0.20	15	0	15
Urban	H55	Land at Layerthorpe	0.20	20	0	20
Urban	H56	Land at Hull Road	4.00	70	0	70
Urban	H58	Clifton Without Primary School	0.70	25	0	25
Urban	ST1	British Sugar/Manor School	46.3	1,200	0	1,200
Urban	ST2	Civil Service Sports Ground Millfield Lane	10.40	266	0	266
Urban	ST4	Land Adjacent to Hull Road	7.54	211	0	211
Urban	ST5	York Central	35.0	1,500	200	1,700
Urban	ST16	Terry's Extension Site – Terry's Clock Tower (Phase 1)	2.18	22	0	22
Urban	ST16	Terry's Extension Site – Terry's Car Park (Phase 2)		33	0	33
Urban	ST16	Terry's Extension Site – Land to rear of Terry's Factory (Phase 3)		56	0	56
Urban	ST17	Nestle South (Phase 1)	2.35	263	0	263
Urban	ST17	Nestle South (Phase 2)	4.70	600	0	600
Urban	ST32	Hungate (Phases 5+)	2.17	328	0	328
Urban	ST36	Impfal Barracks, Fulford Road	18.0	100	500	669
<b>Total</b>				<b>5798</b>	<b>700</b>	<b>6498</b>

Location	ALLOCATION	SITE NAME	Site size (ha)	Potential Residential Units		
				Delivery in Plan Period	Beyond plan period to 2038	Total (2017-2038)
* Imphal Barracks has the capacity to deliver 769 dwellings overall. However, within the plan for 5 year flexibility period to 2037/38 it will deliver 600 homes as set out in the CYC Housing Trajectory [EXCYC16]. The remaining 169 dwellings will be delivered beyond 2038.						
<b>Total housing requirement 2017-2038, inclusive of inherited shortfall</b>						<b>17,102 dwellings</b>
<b>Housing supply</b>						
		<b>Total</b>		10% non-implementation rate		
Extant planning permission @ 1st April 2017		3578		-358		3,220
Windfall allowance (2017-2038)		3,042				3,042
Sites identified within urban areas (outside green belt)		6498		- 650		5,848
<b>Total Housing supply</b>		<b>13118</b>		<b>-1008</b>		<b>12,110</b>
<b>Shortfall</b> (housing requirement – housing supply)						<b>4,992 dwellings</b>

7.37 As evidenced in the SHLAA (2018) [SD049] and the updated detailed housing trajectory [EXCYC16], a 10% non-implementation rate is applied to both extant planning permissions and site allocations identified for housing development. This is deemed reasonable to ensure that the Plan provides a realistic and deliverable housing supply against assessed needs.

7.38 On this basis, there is a need to provide sufficient land to achieve a minimum housing requirement of 17,102 dwellings to ensure that the Green belt boundaries do not need to be altered at the end of the plan period. The SHLAA has identified a supply of 5898 dwellings on land within the urban area (with a 10% non-implementation rate applied). The supply therefore meet 34.5% of the identified need. In addition, the assessment of supply has also identified extant planning permissions of 3220 dwellings (after the non-implementation rate is applied) and a qualified windfall allowance of 3,042 dwellings.

7.39 In total, the identified housing supply will provide sufficient capacity for 12,110 dwellings over the plan period and beyond to 2038 equating to 71% of the identified housing requirement. The shortfall identified is 4,992 dwellings, which needs to be accommodated on additional land outside the existing urban areas, to ensure a Green Belt, which will not need to be altered within at least 5 years beyond the plan period.

## **Gypsy and Traveller and Travelling Showpeople Development needs**

- 7.40 Section 4 and 7b identifies the requirement to deliver:
- 3 Gypsy and Traveller pitches that meet the planning definition;
  - 44 Gypsy and Traveller pitches for households that do not meet demand; and
  - 3 plots for Travelling Showpeople.
- 7.41 In accordance with Government guidance set out in the NPPF (2012) and Planning Policy for Traveller Sites (2015), the Council is required to identify a supply of specific, deliverable Gypsy, Traveller and Travelling Showpeople sites sufficient to provide five years' worth of sites against their locally set targets to meet accommodation needs of these groups who meet the revised definition in York.
- 7.42 The 3 additional Gypsy and Traveller pitches for those who meet the definition are identified to be delivered in the existing local authority sites located within the main urban area at Outgang Lane, Osbaldwick; James St, Layerthorpe and Water Lane, Clifton. Expansion of Outgang Lane, Osbaldwick.
- 7.43 No sites for Travelling Showpeople are allocated or identified within the existing urban area. The plots will therefore need to be identified within the wider area outside of urban development.
- 7.44 The nature of Travelling Showpeople's work, requires level hard standings and covered sheds for the maintenance and storage of large fairground rides. For this reason, applications for yards in existing and allocated employment sites will be supported where the provision will not compromise the employment land supply.
- 7.45 The suitability of the location of any further sites for Gypsies, Travellers or Travelling Showpeople, which come forward during the plan period will be determined in accordance with criteria i - v of Policies H5 and H6. These consider the natural and historic environment, access to public transport and services, road access and congestion, flood risk and amenity. The development of the allocated sites and any further sites that come forward during the plan period will be determined in accordance with Policies H5 and H6 criteria vi – x.
- 7.46 A condition will be attached to any permission to ensure that the sites remain in use by Gypsies and Travellers or Travelling Showpeople, as appropriate and the number of pitches and plots are retained to ensure a supply to need demand.

### **d) Opportunities beyond the York Green Belt**

- 7.47 As set out above the council approached maximising the capacity of existing urban land by: identifying a lower site size threshold (0.2ha) for available

urban land than that stipulated by guidance, re-examined extant housing and employment permissions as well as former allocations and vacant industrial land, applied an allowance for windfall delivery (development on sites below 0.2ha) in line with assessed historic trends, applying a policy of higher housing densities across all urban zones especially where there was access to public transport routes. **The option to meet York's development needs within the urban area has been fully explored but this does not provide sufficient capacity (as set out in the identified shortfall).**

- 7.48 The RSS about 6-mile radius which designates the general extent of the York Green Belt largely encompasses the City of York authority boundary. Therefore, in order to maximise openness within the general extent, **options to channel development to locations beyond the authority boundaries were explored** through discussions with Members and officers of neighbouring authorities to see whether some of York's identified development needs could be accommodated in these areas. Evidence demonstrates that York's housing market extends beyond the authority boundary.
- 7.49 The Council has a long history of joint working and co-operation with its neighbouring authorities and key stakeholders to achieve better spatial planning outcomes. This is set out in the Local Plan Submission Draft Statement to demonstrate compliance with the duty to co-operate (April 2018) [CD020]. Officers have explored the potential to accommodate part of York's housing need outside the City of York Council area through reports to the North Yorkshire and York Spatial Planning and Transport (YNYSPT) Board, which is a Member decision-making group as well as discussions and a workshop with the York and North Yorkshire Technical Officer Group (TOG) hosted by the York, North Yorkshire and East Riding LEP.
- 7.50 At its meeting on 4 September 2015, the YYSPT Board considered a paper, prepared by City of York Council, entitled 'The distribution of the provision of housing in the York Housing Market Area.' This paper stated:
- There is evidence which shows that the housing market area extends into adjoining local authority areas.
  - The City of York administration has concerns about the impact of meeting York's objectively assessed housing need (OAHN) on other policies including protecting the green belt.
  - If the above impact is such that it significantly and demonstrably outweighs the benefits of meeting the OAHN then reasonable alternatives will need to be pursued, including meeting some of the OANH outside the York Local Plan area
  - Referred to Governments expectations of local authorities under the Duty set out in NPPF that authorities should work collaboratively to ensure proper coordination between authorities on strategic priorities and that in York's case the shared housing market could be regarded as such a strategic priority.

- 7.51 Three possible approaches were presented to and considered by the Board which were based on experience elsewhere: preparing a joint Plan; aligning neighbouring Plans in both strategy and plan making timetable; or agreeing an informal joint strategy which would then be incorporated into individual Plans. The General view among Board Members was that at this point in time the respective authorities' local development plans were too far advanced to adopt a sub-regional approach to housing delivery, but there is the potential for future plans to be more sub-regional in approach, if sufficiently evidenced. On this basis, the City of York Local Plan sought to meet its objectively assessed needs for development wholly within its unitary authority area.
- 7.52 Following the Board meeting, this matter was considered further by the North Yorkshire and York Technical Officer Group (TOG) at its meeting on 27 November 2015, with regard to the Board's 'agreement in principle' for future plans to be more sub-regional in approach. The TOG considered a report that:
- outlined City of York Council's (CYC's) considerations for allocating sufficient land within its emerging Local Plan to meet its housing need over the plan period and set an enduring green belt in the context of a more sub regional approach for delivering housing in the York Housing Market Area being considered in the longer term (i.e. in the next plan making round) and
  - sought TOG's advice on pursuing a more sub regional approach for delivering housing in the York Housing Market Area in the longer term with particular regard to the approach being taken by City of York Council in its considerations for allocating sufficient land within its emerging Local Plan, and setting an enduring Green Belt beyond the Local Plan period.
- 7.53 The outcomes of these discussions together with updated OAHN evidence base were presented to Members at Local Plan Working Group (27 June 2016) and Executive (30 June 2016) wherein Members were also asked to agree to progress to public consultation on sites to meet the identified need. Members resolved to progress the plan to the Preferred Sites Consultation as presented based upon City of York meeting its OAHN within the authority boundary.
- 7.54 In response to the preferred sites consultation, the Council received the following comments from neighbouring authorities specifically supporting this approach:
- Ryedale District Council - *"The District Council currently supports the position whereby the City is committed to meeting its own housing requirements"*.
  - East Riding of Yorkshire – *"Whilst the preferred sites consultation document does not specifically seek comments on this evidence, it has sought to identify sufficient land that would meet the full need for future housing and employment development within the City Council's administrative area. This approach is strongly supported by East Riding of Yorkshire Council. It will help to promote a sustainable pattern of*

*development by directing growth towards locations that would reduce the need to travel and encourage the use of sustainable transport modes.”*

- Hambleton District Council – *“The consultation document identifies sufficient land to accommodate the development needs of the City and establishes a Green Belt boundary enduring 20 years. The consultation document no longer safeguards land for development and recognises that the build out time of the strategic sites will extend beyond the plan period. Officers support this approach as it ensures that the longer term development needs of the City of York can be met, without placing pressure on areas in neighbouring authorities.”*

7.55 A further paper was presented at a subsequent Board on 17 January 2018. This paper provided an update on the preparation of the City of York Local Plan including the Pre-Publication Draft (Regulation 18) Consultation and set out the work that City of York Council has undertaken to discharge its responsibilities under the Duty to Co-operate (the Duty). The Board endorsed the approach taken by City of York Council in meeting the requirements of the Duty to co-operate in the plan making process.

7.56 The option of accommodating some of York’s development needs in adjacent local authority areas was fully explored prior to Submission and does not provide an alternative approach for meeting development needs. The Green Belt within the City of York administrative area therefore provided the only available source of land that could realistically address the identified shortfall whilst, still supporting a sustainable pattern of development.

7.57 A Statement of Common Ground signed by all of City of York’s neighbouring authorities was submitted into the City of York’s Examination Library in December 2019 [EX SoCG 2]. The purpose of the SoCG was to inform the Inspectors of areas of agreement between the parties in relation to matter one ‘legal requirements’, to be heard during the 1st phase of hearings into the submitted draft York Local Plan (Local Plan) [CD001]. This SoCG confirms that there are no unresolved strategic issues between the authorities. It therefore forms part of the evidence required to demonstrate that the Council have complied with the duty to cooperate.

7.58 In the SoCG the authorities specifically agree:

Scale of Housing Growth:

9. *The Local Plan seeks to meet its objectively assessed needs for development wholly within its unitary authority area. York’s Local Plan appropriately seeks to meet the updated OAN of 790 dpa, sufficient to respond to market signals, economic and institutional growth, as well as making a significant contribution to affordable housing needs. In order to meet the housing requirement set out in Policy SS1, the schedule of sites set out in Policy H1 are proposed for residential development.*
10. *Local planning authority signatories agree that their respective plans, either adopted or currently being prepared will meet the objectively assessed level of housing requirement within their respective planning authority areas and that the*

*City of York Local Plan is not required to accommodate any unmet housing requirements.*

#### Scale of Economic Growth

- 14. The York Local Plan will meet the full identified employment land needs identified in the Employment Land Review 2016 [SD064] (ELR) and ELR Update 2017 [SD063] with an appropriate level of employment land allocations to ensure flexibility. In doing so economic growth is focussed in the City Centre and other sustainable locations. The Plan seeks to provide sufficient housing allocations within the City of York to enable people to live and work in York thereby seeking to minimise any increase in inward or outward commuting. The plan provides sufficient land to accommodate an annual provision of 650 jobs per annum and in doing so enables York to realise its economic growth ambitions as a key driver in the Leeds City Region and York, North Yorkshire and East Riding LEPs.*
- 15. Local planning authority signatories agree that their respective plans will meet identified employment requirements within their respective planning authority areas and that there are no outstanding unresolved strategic issues relating to the scale of employment growth.*

#### Gypsies, Travellers and Showpeople

- 29. It was identified through joint working that uncoordinated provision of suitable sites for gypsies, travellers and showpeople could lead to over-provision or under provision at the Sub-regional/Sub-area level. The impact would extend to surrounding authorities if York doesn't meet its own needs. York's identified needs for gypsy, travellers and travelling showpeople will be met over the plan period as set out in Policy H5. City of York Council is not looking to other neighbouring authorities to accommodate unmet need. None of the adjoining authorities have formally approached the Council about accommodation needs for their authority areas.*
- 30 Local planning authority signatories agree that there are no outstanding unresolved strategic issues relating to gypsies, traveller and showpeople.*

#### Education Establishments

- 31. In preparing the Local Plan, consideration has been given to patterns of cross boundary travel to education establishments outside York and cross boundary travel into York's education establishments from outside York. Site specific policies for the strategic sites identified in the Local Plan seek to ensure the provision of new or enlarged education establishments to meet the needs identified from the site/s. The Local Plan will ensure there are sufficient modern preschool, primary and secondary education facilities within the city to meet education needs.*
- 32. Local planning authority signatories and North Yorkshire County Council agree that there are no outstanding unresolved strategic issues relating to education provision.*

- 7.59 Selby District Council's decision to begin work on a new comprehensive Local Plan in September 2019 followed by discussions regarding York's Housing Market Area at Phase 1 Hearing Sessions led to the preparation of a Joint Position Statement agreed between the authorities, which was submitted into York's Examination Library in May 2020 [EXCYC38]. This statement clarified the position agreed between the City of York Council and Selby District

Council through the Duty to Co-operate in relation to the shared York Housing Market Area. Both Councils recognise that there are clear functional links between York LA and the Selby District LA and both authorities have worked together, through the Duty to Co-operate, to ensure that housing needs are fully met across the Housing Market Area. This concluded that it remains the position of both the City of York and Selby Councils that it is not practical to align the preparation of the two plans and that the agreed position remains that both authorities should seek to meet their own needs within their own administrative boundaries.

### **e) Conclusion**

- 7.60 The Council has considered the potential to locate identified development requirements within the existing urban areas (including the main urban area, villages and industrial estates) which are considered generally to be a sustainable locations for development, with greater potential for the reuse of previously developed land (brownfield development). In line with York Green Belt SP9, this included the needs for employment, housing (including gypsy and traveller and travelling showpeople) and education in York across the Plan period.
- 7.61 This also reflects the Council's approach to determining the extent to which development might be located in other local authority areas outside the general extent of the Green Belt, which concluded that this was not feasible and, in any event, it would risk introducing unsustainable patterns of development to meet York's needs. Neighbouring authorities have agreed that the individual authorities should meet their own authority needs within the preparation of their own plans.
- 7.62 In moving forward, the council must therefore use York Green Belt SP10 (i.e. where there are development needs for the authority which cannot be met within the existing urban areas of York or neighbouring local authorities, the most sustainable locations for development should be identified) and York Green Belt SP11 (i.e where new sites for development are identified these should be those which cause the least harm to the primary purpose of the York Green Belt), to meet identified needs.

## Section 8: Methodology (4): Defining Detailed Boundaries

### **a) Introduction**

- 8.1 In order to provide a better explanation, this stage of the methodology now includes 5 criteria which link back to the three relevant Green Belt purposes and strategic principles (identified in section 5). These criteria set key questions and detailed considerations, which take into account identified elements of the evidence base and are applied to the land under consideration in the corresponding Annexes.

### **b) Role and Function of Land - Evidence base**

- 8.2 The function and role of land, in particular whether the land fulfils one or more of the Green Belt purposes, has been considered through a single assessment exercise. This assessment exercise has been guided and informed by both strategic and detailed considerations:
- **Strategic principles** drawn from section 5 of the methodology reflect key features of the general extent of the York Green Belt and its broad function and role as part of the General Extent
  - **Detailed assessment considerations:** are more local and specific, involving desk top study and site visit appraisals and drawing on a range of evidence sources and policy guidance to provide a more detailed and granular level of assessment ('on the ground' and 'on a small-scale map').
- 8.3 Both strategic and detailed considerations are presented in Criteria 1 to 5 (see section 8c "Assessing Green Belt Purposes"). These are informed by a series of evidence base studies and documents. The high level geographic outputs of these studies and the explanation of their uses are presented in **Annex 1** with details of the information they present summarised into the following categories:

#### **Baseline Mapping**

- 8.4 Baseline maps have been studied as a desktop exercise and the principles considered further in site visits. Those considered include Ordnance Survey mapping, aerial photography and figure ground maps to help establish and identify built structures and open land. The figure ground data of built structures has also been analysed to show the relative density of developed areas as a further consideration when assessing openness.
- 8.5 The topography of the authority area and key approaches and access routes into York were also identified as a starting point to identify accessibility to different parcels of land on the periphery of the urban area. They have also provided an indication of where these routes might form "open approaches" from which views might be important in enhancing the understanding or significance of York.

## Land Use Evidence

- 8.6 There are also a number of land use evidence documents, which are considered to contribute to understanding the identity, role or function of land. While the land around York is not identified for its landscape beauty, and green belt purposes are not directly related to broad considerations of landscape character, it is considered that the lack of specific interest or obstruction has made the pattern of built development and features within it more dominant. This setting has enhanced the evolution and significance of these assets and prominence of the city as a whole. Understanding the landscape and role of land is also important in understanding its function as part of the countryside or urban fringe of the city.

## Historical Context

- 8.7 The details of the Green Belt Appraisal and Heritage Topic Paper are set out in section 5 and many of the more detailed local character elements are relevant to assessment of parcels of land. Understanding the location of heritage assets and information in relation to the age and context of land has also been considered to inform the Councils understanding of the value of this land to the principle of historic character and setting. Whilst these studies do not necessarily indicate land, which needs to be kept permanently open, they have provided context to inform site visits and decision-making.

## **c) Assessing land against the Green Belt purposes**

- 8.8 The following section considers the fundamental aim of keeping land permanently open as well as NPPF Green Belt purposes which are relevant to the York Green Belt (Section 5b), and how the evidence referred to in section 8a and listed in Annex 1 relate to these.
- 8.9 Five criteria are identified; three for Purpose 4 (guided by the relevant principal characteristics identified in the Heritage Topic Paper), one criterion for Purpose 1 and one criterion for Purpose 3.
- 8.10 A key overarching question sets the goal of each criterion. Having considered the policy context in sections 3, 4 and 5, the Strategic Principles set the parameters for how the NPPF purposes should be applied within each criterion (Section 5) and how the boundaries to be determined have been scoped (Section 6). A number of detailed questions provide the focus for the assessment of the role and function of land and the relative delineation of boundaries. These questions require consideration of baseline mapping, land use evidence and historical context evidence – alongside appreciations gained from site visits. Relevant studies and parts of the evidence base are identified (as explained in Annex 1). The discursive evaluation of each boundary section to the York Green belt as set out in in **Annexes 2, 3 and 4** reflects this approach.

#### **Purpose 4: To preserve the setting and special character of historic towns**

- 8.11 In relation to purpose 4, the saved RSS policies refer to safeguarding both the ‘special character’ and ‘setting of the historic city’ as part of the York Green Belt (Policy YH9 CD031), and specifically reference the need to “*protect and enhance the significant historic and environmental character of York*”, referencing the historic setting, views of the minster and important open areas.
- 8.12 Historic England advice sets out that that specialist character of a place is “*the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute*”. (Historic Environment Good Practice Advice in Planning: 3 (2017, Historic England)
- 8.13 All heritage assets have a setting<sup>7</sup> and environmental factors, land uses and openness within a historic environment or as part of the setting of a heritage asset, influence our understanding of the historic relationship between places<sup>8</sup>. The NPPF (2012) and NPPG also provide advice on how heritage assets and their setting should be conserved regarding significance, character and setting.
- 8.14 The NPPF glossary sets out a definition of a heritage asset as “*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*”. The glossary also makes clear that the setting of a heritage asset is “*the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surrounding evolve*”.
- 8.15 Historic England’s guidance<sup>9</sup> goes further in explaining setting, that “*while setting can be mapped in the context of an individual application or proposal, it does not have a fixed boundary and cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their*

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<sup>7</sup> NPPF Glossary (2012)

<sup>8</sup> NPPG (2014) Paragraph: 013 Reference ID: 18a-013-20140306

<sup>9</sup> Historic Environment Good Practice Advice in Planning: 3 (2017) Historic England

*setting and the values placed on that setting and therefore the significance of the heritage asset”.*

- 8.16 In terms of Green Belt designations which recognise historic setting, the guidance<sup>7</sup> explains that “*Extensive heritage assets, such as landscapes and townscapes, can include many heritage assets and their nested and overlapping settings, as well as having a setting of their own, a conservation area will include the settings of listed buildings and have its own setting, as will the village or urban area in which it is situated (explicitly recognised in Green Belt designations)*”.

#### **Assessment against Purpose 4**

- 8.17 Part one of the methodology (section 5) establishes that in terms of the special character and historic setting of York, there are two key studies that establish strategic principles that inform and guide the assessment of land against Purpose 4:
- the **Green Belt Appraisal** (2003 [SD107], with subsequent historic character and setting updates (2011) [SD108] and 2013 [SD106]; and
  - the **Heritage Topic Paper** (2014, [SD103]).
- 8.18 Given the fundamental purpose of Green Belt to prevent urban sprawl, by keeping land **permanently open**, the criteria for purpose 4 have been set by the principal characteristics identified by the Heritage Topic Paper [SD103] which relate to openness. These are:
- **compactness, (Criterion 1)**
  - **landmark monuments and (Criterion 2)**
  - **landscape & setting (Criterion 3)**

#### Compactness

- 8.19 Compactness is important to understanding the setting of the historic city. The concentric form of the main urban area echoes events in the history of York relating to historical periods of occupation by the Romans, Vikings etc. and would have been a factor in creating a defensible city.
- 8.20 The historic occupation and focus of development resulted in a pattern of development with a densely populated urban core, in close proximity to specifically maintained open areas which lead out to the wider countryside. This created a sense of strong residential communities, and the open swathes of land often historically used for grazing and common land (Strays and Ings), enabled the agricultural economy to flourish, as well as facilitating the development of areas for leisure, and created strong links to the countryside. As the city has grown, the maintenance of these large open areas of land has created separation, which has aided the retention of identifiable local districts within the main built up area, and areas which represent the historical themes and characteristics of the city.

- 8.21 The dense urban core is in stark contrast to the open rural and relatively un-interesting landscape around it. The city’s prominence as an administrative centre within this less diverse landscape would have drawn people to it. The visual dominance of the city was enhanced with the completion of the Minster and its growth as an ecclesiastical destination.
- 8.22 Today, this compactness has formed a key element of the character of York, by creating a walkable urban city, with the open countryside easily accessible even from the city centre, and the open swathes framing important vistas into and out of the core. The containment of the main urban area within the outer ring road has echoed the concentric form, and enabled the dominance of the urban core within its open rural fringes to be experienced along this often elevated route and other key approaches, enabling aspects of the story and setting of York to be experienced.
- 8.23 The compactness of the villages themselves is another key element of this criteria. The scale and context of the villages contribute to the understanding of these and how they sit within the wider landscape

<b>Criterion 1: Compactness</b>	
<b>Key question:</b>	
Does land need to be kept permanently open in order to aid the perception or understanding of a compact city?	
<b>Scoping: Strategic Principles</b>	
Strategic Principles SP1, SP2, SP3, SP4, SP5 and SP7 form the basis for this criterion.	
SP7 a) ‘Compactness’ sets the broad context for this criterion: This involves consideration of the Heritage Topic Paper and Green Belt Appraisal characteristics regarding the contained concentric form; the relationship between the urban edge and the countryside; the strays, Ings and Green wedges and extended Green wedges; flat terrain and views; arterial roads and open approaches; identifiable compact districts; identity and urban form of urban and rural villages; areas which prevent coalescence.	
<b>Detailed Assessment Questions:</b>	<b>Assessment evidence:</b>
1.1 Does the land need to be kept permanently open as part of a wider view of a dense compact city or village in an open or rural landscape?	<u>Baseline Evidence</u>
1.2 Does the land need to be kept permanently open to maintain the scale or identity of a compact district or village?	<ul style="list-style-type: none"> <li>• OS Maps (<i>Annex 1, Evidence 1</i>)</li> <li>• Aerial Photography (<i>Annex 1, Evidence 2</i>)</li> <li>• Figure Ground Data (<i>Annex 1, Evidence 3</i>)</li> <li>• Density Analysis (<i>Annex 1, Evidence 4</i>)</li> <li>• Topography (<i>Annex 1 Evidence 5</i>)</li> <li>• Key approaches (<i>Annex 1, Evidence 6</i>)</li> </ul>
	<u>Landscape Context evidence</u>
	<ul style="list-style-type: none"> <li>• North Yorkshire and York Landscape Character Project (<i>Annex 1, Evidence 7</i>)</li> </ul>

<p>1.3 Does the land need to be kept permanently open to constrain development from coalescing or by maintaining a connection to open or historic setting?</p>	<ul style="list-style-type: none"> <li>• York Landscape Study (ECUS) (<i>Annex 1, Evidence 8</i>)</li> </ul> <p><u>Historic Context evidence</u></p> <ul style="list-style-type: none"> <li>• GB Appraisal (<i>Annex 1, Evidence 11</i>)</li> <li>• Heritage Topic Paper (<i>Annex 1, Evidence 12</i>)</li> <li>• CHCCA Views Analysis (<i>Annex 1, Evidence 13</i>)</li> <li>• York Historic Environment Characterisation (<i>Annex 1, Evidence 14</i>)</li> <li>• Conservation Area Appraisals (<i>Annex 1, Evidence 17</i>)</li> <li>• Historic Land Characterisation (<i>Annex 1, Evidence 19</i>)</li> </ul>
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### Landmark Monuments

- 8.24 The city of York contains many important landmarks, buildings and monuments which can have spatial, temporal or cultural significance to the city and its landscape and aid the understanding of the cities evolution and relationship to people or the physical environment.
- 8.25 In some cases the open setting of these assets can add to the significance or the understanding of the monument itself or the wider landscape.
- 8.26 Long distance views of the minster help to understand the significance of the visibility of the landmarks dominance in the wider landscape. The views of the Minster from green wedges, open land and strays closer to the city illustrate the importance and dominance of the cities ecclesiastical heritage.
- 8.27 Other smaller buildings monuments and landmarks likewise add to the story and context of the city, as the openness of the setting and links the wider city setting may explain the reason for their placement or add to their significance. Herdsman huts, Roman Camps or boundary stones for example aid the understanding of the historical themes of the city, their original siting and context would have been governed by the open context of the area. Maintaining this openness aids understanding of the asset and enhances its significance. Each assets must be considered and assessed individually.

<b>Criterion 2: Landmark Monuments</b>
<p><b>Key question:</b></p> <p>Does the land need to be kept permanently open to contribute to the understanding and significance of a building, landmark or monument?</p>
<p><b>Scoping: Strategic Principles</b></p> <p>Strategic Principles SP1, SP2, SP3, SP4, SP5 and SP7 form the basis for this criterion.</p>

SP7 b) 'Landmark Monuments' sets the broad context for this criterion. This involves consideration of Heritage Topic Paper and Green Belt Appraisal characteristics, regarding in particular landmarks of spatial, temporal or Cultural significance to the City and includes City the Minster and structures associated with the city's railway and chocolate manufacturing heritage as well as other designated assets.

The cities Green Wedges and the long distance views from the surrounding higher ground beyond York are of particular significance to the setting of the Minster as are areas where openness contributes to the significance of more local assets.

**Detailed Assessment Questions:**

- 2.1 Does land need to be kept permanently open to understand the original siting or context of a building, landmark or monument
- 2.2 Does land need to be kept permanently open to understand the visual dominance, prominence or role of a focal point of the building, landmark or monument?
- 2.3 Does the land need to be kept permanently open as part of the tranquillity, remoteness or wildness of the asset?

**Assessment evidence:**

Baseline Evidence

- OS Maps (*Annex 1, Evidence 1*)
- Aerial Photography (*Annex 1, Evidence 2*)
- Figure Ground Data (*Annex 1, Evidence 3*)
- Density Analysis (*Annex 1, Evidence 4*)
- Topography (*Annex 1 Evidence 5*)
- Key approaches (*Annex 1, Evidence 6*)

Historic Context Evidence

- GB Appraisal (*Annex 1, Evidence 11*)
- Heritage Topic Paper (*Annex 1, Evidence 12*)
- CHCCA Views Analysis (*Annex 1, Evidence 13*)
- Listed Buildings (*Annex 1, Evidence 15*)
- Scheduled Ancient Monuments (*Annex 1, Evidence 16*)
- Conservation Area Appraisals (*Annex 1, Evidence 17*)
- 

**Landscape Setting**

- 8.28 The open countryside around York is shaped by the natural factors of geology, topography and climate, which were important in determining the location of the settlement, and the themes which shaped its development historically. The river corridor provided a means of access and communication and the topography gave clear accessible walking routes across it.
- 8.29 The large scale, flat, open landscape would have been an important consideration in its choice as a military defensive position and resulted in making the minster and built up areas around it dominant within the landscape. The open countryside also provided a context for the rural agricultural economy to flourish and suitability for the many airfields which developed in the area. Key attributes of York's character include a strong association to the open countryside and a clock face of smaller compact villages. The villages themselves are considered to be important as part of the

service network around York and form nested landscapes within the historic city's setting. The setting of the villages may therefore contain land which needs to be kept permanently open as part of the York Green Belt, to protect the setting and special character of the wider city landscape and character of York.

- 8.30 The use of the open countryside for farming practices associated with York and its service villages have meant that there are large swathes of land which have remained untouched and present a strong legibility to the original field patterns and usage. The lack of disturbance to this land has also resulted in a range of special habitats developing and has created the many nature conservation designations around the city. These nature conservation designations are a consideration in this historic context only where they can tell us something about the origin and use of the land.

<b>Criterion 3: Landscape and Setting</b>	
<b>Key Question:</b>	
Does the land need to be kept permanently open as part of the wider landscape associated with the historic character and setting of York?	
<b>Scoping: Strategic Principles</b>	
Strategic Principles SP1, SP2, SP3, SP4, SP5 and SP7 form the basis for this criterion.	
SP7 c) 'Landscape and Setting' sets the broad context for this criterion. This involves consideration of the Heritage Topic Paper and Green Belt Appraisal characteristics, regarding in particular strays, Ings, river corridors and Green Wedges, open Approaches and views, the impression of an historic city in a rural setting, the relationship with the surrounding villages and the setting of those villages.	
<b>Detailed Assessment questions:</b>	<b>Assessment evidence:</b>
3.1 Does the land need to remain permanently open to aid the understanding of the historical relationship of the city to its hinterland, particularly as perceived from open approaches?	<u>Baseline Evidence</u>
	<ul style="list-style-type: none"> <li>• OS Maps (<i>Annex 1, Evidence 1</i>)</li> <li>• Aerial Photography (<i>Annex 1, Evidence 2</i>)</li> <li>• Figure Ground Data (<i>Annex 1, Evidence 3</i>)</li> <li>• Density Analysis (<i>Annex 1, Evidence 4</i>)</li> <li>• Topography (<i>Annex 1 Evidence 5</i>)</li> <li>• Key approaches (<i>Annex 1, Evidence 6</i>)</li> </ul>
3.2 Does the land need to remain permanently open to aid the understanding or significance for the situation of a designated landscape, park or garden?	<u>Landscape Context evidence</u>
	<ul style="list-style-type: none"> <li>• North Yorkshire and York Landscape Character Project (<i>Annex 1, Evidence 7</i>)</li> <li>• York landscape Study (ECUS) (<i>Annex 1, Evidence 8</i>)</li> <li>• Nature Conservation Designations (<i>Annex 1, Evidence 9</i>)</li> </ul>

	<p><u>Historic Context evidence</u></p> <ul style="list-style-type: none"> <li>• Gb Appraisal (<i>Annex 1, Evidence 11</i>)</li> <li>• Heritage Topic Paper (<i>Annex 1, Evidence 12</i>)</li> <li>• CHCCA Views Analysis (<i>Annex 1, Evidence 13</i>)</li> <li>• York Historic Environment Characterisation (<i>Annex 1, Evidence 14</i>)</li> <li>• Conservation Area Appraisals (<i>Annex 1, Evidence 17</i>)</li> <li>• Designated historic Parks and Gardens (<i>Annex 1, Evidence 18</i>)</li> <li>• Historic Land Characterisation (<i>Annex 1, Evidence 19</i>)</li> </ul>
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**Purpose 1: To check the unrestricted sprawl of large built-up areas**

- 8.31 Paragraph 79 of the NPPF (2012) identifies the prevention of urban sprawl as the fundamental aim of all Green Belt. The NPPF and NPPG do not give a definition of the term “sprawl”. The Royal Town Planning Institute Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not specific in that it states this type of development can take the form of “*contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development*”. The Oxford English dictionary identifies sprawl as “the spreading out of built form over a large area in an untidy or irregular way”.
- 8.32 It is possible therefore to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because Purpose 1 is the principal objective of the Green Belt as a strategic planning designation. Land immediately adjacent to a large built up area is likely to contribute to this purpose, as it provides the boundary and zone of constraint to urban expansion.
- 8.33 The spread of urban areas into the neighbouring countryside could be in the form of ribbon development along the edges of roads or non-compact built development. Where there is no or little urban sprawl, the area contributes further to achieving this purpose of the Green Belt than an area into which unrestricted sprawling development has already penetrated, as the Green Belt is more open in character. Areas may have already been compromised by urban sprawl, as a result of urbanising influences. Unchecked urban sprawl, which is irregular or straggling, would compromise the openness of the Green Belt.

**Assessment against Purpose 1**

- 8.34 Open areas adjacent to built-up areas in particular fulfil a role in preventing sprawl. At a broad strategic level, in the circumstances of the York administrative area and having regard to the scoping of inner and outer boundary considerations explained above, the development of land

immediately adjacent to the main built-up area of the city (as the only large built-up area to consider) is likely to contribute more strongly to the sprawl of the urban area as an inner boundary consideration, compared to land further inside the general extent of the Green Belt and in the area of the outer boundary. Land adjacent to the existing urban area, to an extent, will be acting to prevent urban sprawl.

- 8.35 The determination of whether different areas of land perform this function of Green Belt (purpose 1) requires a detailed, site specific assessment. This exercise undertaken via desk top study and site visits has focussed on criteria 4. These have been applied in the York Green Belt Outer and Inner Boundary Section Descriptions and Justifications (Annexes 2, 3 & 4) in order to identify land that functions to prevent sprawl.

<b>Criterion 4: Urban Sprawl</b>	
<b>Key Question:</b>	
Does the land function to contain the urban area and protect open land from urban sprawl?	
<b>Scoping: Strategic Principles</b>	
Strategic Principles SP4, SP5 and SP8 form the basis for this criterion.	
SP8 sets the broad context for this criterion. Given the pattern and distribution of urban development within the City of York authority, the history of subsuming villages within the urban area and the need to maintain compactness and village identity all areas on the periphery of dense development should be considered in terms of potential Sprawl.	
<b>Detailed assessment questions:</b>	<b>Assessment evidence:</b>
4.1 Is land connected to or within proximity to the urban area and therefore relevant for sprawl?	<u>Baseline Evidence</u>
4.2 Does the land have an increased risk of sprawl occurring through the presence of low-density, agricultural or recreational structures such as farms, isolated buildings or small clusters with a strong sense of openness, or the possibility of creating ribbon development?	<ul style="list-style-type: none"> <li>• OS Maps (<i>Annex 1, Evidence 1</i>)</li> <li>• Aerial Photography (<i>Annex 1, Evidence 2</i>)</li> <li>• Figure Ground (<i>Annex 1, Evidence 3</i>)</li> <li>• Density Analysis (<i>Annex 1, Evidence 4</i>)</li> <li>• Topography (<i>Annex 1 Evidence 5</i>)</li> <li>• Key approaches (<i>Annex 1, Evidence 6</i>)</li> </ul>
4.3 Is the land unconstrained by built development or strong boundaries on more than one side, and therefore not	<u>Landscape Context evidence</u>
	<ul style="list-style-type: none"> <li>• Open space Typology (<i>Annex 1, Evidence 10</i>)</li> </ul>
	<u>Historic Context evidence</u>
	<ul style="list-style-type: none"> <li>• Historic Land Characterisation (<i>Annex 1, Evidence 19a</i>)</li> </ul>

<p>contained or enclosed in a way which would prevent sprawl?</p> <p>-</p>	
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### **Purpose 3: To assist in safeguarding the countryside from encroachment**

- 8.36 While the term encroachment is not defined in the NPPF (or NPPG), it can be considered as “*A gradual advance beyond usual or acceptable limits*”<sup>8</sup>. This definition can be interpreted as relating to new structures but also gradual change or use of structures or land type in a way which changes the context of the area. This purpose of the Green Belt is to ensure that built development does not gradually advance into countryside beyond its existing limits, reducing the open characteristic of the Green Belt.
- 8.37 PAS guidance<sup>7</sup> includes the presumption that all green belt performs this function but goes on to propose a useful approach to use in testing this purpose as: “*to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.*”
- 8.38 The contribution that land makes to safeguard the countryside from encroachment can be considered in terms of the extent to which it relatively displays the characteristics of countryside, i.e. lack of built development and urbanising influences, and the extent to which it relates to the adjacent settlement and to the wider countryside. Countryside is land/scenery which is rural in character, i.e. a relatively open natural, semi-natural or farmed landscape.

#### **Assessment against Purpose 3**

- 8.39 There is a strong relationship between the urban centre of York and a sense of connection to the countryside, a key defining characteristics of the City today. The assessment of land against Purpose 3 focuses on the extent to which the countryside characteristics of the Green Belt have been compromised by encroachment from urban development or urbanising influences. **Urbanising influences** are considered to include any features that compromise the countryside character, such as roads lined with street lighting and pavements, large areas of hard standing, floodlit sports fields, etc. It is also necessary to consider whether they include development which is commonly found within the countryside, e.g. agricultural or forestry related development, isolated dwellings, historic schools and churches. **Encroachment from urbanising influences** is the intrusion / gradual advance of buildings and urbanised land beyond an acceptable or established limit. This may be from buildings within the assessment area or within neighbouring land.

8.40 In terms of assessment many relevant considerations have already been considered under purpose 4 and purpose 1, what remains is to identify if the function of the land is explicitly that of countryside rather than urban fringe, are there any significant urbanising influences, and how much encroachment of built development has already occurred, as this may already affect open character and the feel of the countryside.

<b>Criterion 5: Encroachment</b>	
<p><b>Key Question:</b> Does the land have the characteristics of countryside and/or connect to land with the characteristics of countryside which needs to be protected from encroachment?</p>	
<p><b>Scoping: Strategic Principles</b></p> <p>Strategic Principles SP2, SP3, SP4, SP5 and SP9 form the basis for this criterion.</p> <p>SP9 sets the broad context for this criterion. Outside the clusters of built development analysis has shown that the whole of the authority area is of an open agricultural countryside nature with open views across the flat open landscape.</p>	
<p><b>Detailed Assessment Questions</b></p> <p>5.1 Is the land characterised by an absence of built development or urbanising influences?</p> <p>5.2 Does the land function as part of the countryside in terms of relationships within it or acceptable uses within it; including those for agriculture, forestry, woodland, equestrian and other uses, small villages, rural business parks or other building clusters?</p> <p>5.3 Does the land contribute to the character of the countryside through openness, views or accessibility</p> <p>-</p>	<p><b>Assessment evidence:</b></p> <p><u>Baseline Evidence</u></p> <ul style="list-style-type: none"> <li>• OS Maps (<i>Annex 1, Evidence 1</i>)</li> <li>• Aerial Photography (<i>Annex 1, Evidence 2</i>)</li> <li>• Figure Ground (<i>Annex 1, Evidence 3</i>)</li> <li>• Density Analysis (<i>Annex 1, Evidence 4</i>)</li> <li>• Topography (<i>Annex 1 Evidence 5</i>)</li> <li>• Key approaches (<i>Annex 1, Evidence 6</i>)</li> </ul> <p><u>Landscape Context evidence</u></p> <ul style="list-style-type: none"> <li>• North Yorkshire and York Landscape Character Project (<i>Annex 1, Evidence 7</i>)</li> <li>• York landscape Study (ECUS) (<i>Annex 1, Evidence 8</i>)</li> <li>• Nature Conservation Designations (<i>Annex 1, Evidence 9</i>)</li> <li>• Open space Typology (<i>Annex 1, Evidence 10</i>)</li> </ul> <p><u>Historic Context evidence</u></p> <p>Historic Land Characterisation (<i>Annex 1, Evidence 19a</i>)</p>

#### **d) Permanence: boundary definition**

- 8.41 The NPPF confirms that the importance of ensuring the permanence of Green Belt boundaries (see paragraph 79) and advises at paragraph 85 that local planning authorities should “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.
- 8.42 In order to make boundaries recognisable it is important that they utilise to existing features. Ideally these should be ones which are identifiable both on a map and on the ground (SP13).
- 8.43 Hard landscaping and major infrastructure can be argued to provide more permanent features, due to their expense and resistance to natural erosion and processes. However, features which are more natural but have long been established and therefore have already stood the test of time, also offer a type of permanence.
- 8.44 Further, it is relevant to consider any recent planning permissions when determining detailed boundaries, in order that the boundary provides long-term certainty and does not need to be updated.
- 8.45 The strongest Green Belt boundaries are those which take all of the above into consideration and can offer the greatest resilience to change or erosion thereby playing a greater role in supporting the purposes of Green Belt. One feature of resilience are those boundaries which layer more than one feature or attribute in the same location as they create a greater likelihood of enduring through change. Another is, where possible, for boundaries to follow the most continuous ‘regular’ or ‘consistent’ line, as irregular or softer boundaries can be more vulnerable to misinterpretation and erosion and therefore, would be less likely to restrict growth within the Green Belt.
- 8.46 As previously highlighted, the distinction between the urban and rural environments through clear defensible Green Belt boundaries has a role in preventing sprawl and coalescence as well as protecting the countryside from encroachment and encouraging urban regeneration. The Heritage Topic Paper Update (2014) [SD103] explains the importance of preserving the city’s compactness (accentuated by its containment within the York Outer Ring Road) as well as its landscape and setting (particularly the close proximity of the historic core and perimeter countryside and views of landmarks as well as the rural edge setting of the city viewed from the surrounding ring road). Where there is a clearly identifiable existing urban edge which can also form an acceptable Green Belt boundary, linking these two features can help to support all of the Green Belt purposes and importantly maintain the compact city and its important rural edge.
- 8.47 In this context, the following questions are asked in respect of detailed boundary identification:

**1. Does the boundary offer Recognisability?**

- I. Are there recognisable features which can be associated with the Boundary?

**2. Does the boundary offer Permanence?**

- I. How long has the boundary already existed?
- II. Are there features such as infrastructure (such as main roads and railway lines) or landform/prominent physical features (such as watercourses, ridgelines or protected woodland/hedge) which provide a boundary that is likely to be permanent?
- III. Are there any consented and not yet built planning applications in the area?

**3. Does the boundary offer Strength?**

- I. Are there multiple layered boundaries which can offer greater resilience?
- II. Is there existing development with strongly established, regular or consistent boundaries or is there weak or irregular boundaries.

8.48 Further to the above:

- a. the boundary should follow the curtilage of properties except where large areas that extend up to existing countryside and are not encompassed by built form and contribute to openness;
- b. Metalled surface of roads being determined as urban only when they are in proximity to other urban uses.
- c. Connectivity to the urban area of the land is also an important consideration.

**e) Consistency with Local Plan strategy**

8.49 The boundary setting exercise is consistent with the local plan strategy and therefore SP10 (Section 5). The boundaries serve to channel development in to the urban area. The boundaries reflect an approach that respect and enhance the historic character, green spaces and landscape of York and helps to create a high quality, locally distinctive place which relates well to the surrounding area and its historic character (thereby delivering Policy DP3 Sustainable Communities).

8.50 In particular the boundary setting exercise addresses the first spatial principle set out in Policy SS1: Delivering Sustainable Growth for York by conserving and enhancing York's historic and natural environment, including the city's character and setting. Supporting a compact City also serves to support the second spatial principle of ensuring accessibility to sustainable modes of transport and a range of services. Policy SS2 requires the detailed boundaries shown on the proposals map should follow readily recognisable physical features that are likely to endure such as streams, hedgerows and highways. In accordance with SP13 and SP10 (Section 5), the boundary setting exercise has done this and delivered the primary purpose of the Green Belt to safeguard the setting and the special character of York as set out in Policy SS2 (and SP11, Section 5).

- 8.51 The main built up areas of York are defined on the key diagram within the City of York Local Plan and broadly relate to the densest areas of built development. The Local Plan spatial strategy has sought to ensure that new development is well related to the main built up areas to ensure sustainability with accessibility to sustainable modes of transport and a range of services .

### **f) Conclusion**

- 8.52 The methodology explained in this section has been applied in more detail in associated Annexes and in accordance with Strategic Principles set out at Annex 5. Annexes [2, 3 and 4] deal with the outer and inner boundaries (including those areas to be inset from the general extent). The approach to allocated sites to ensure the long term permanence of the Green Belt is set out in Section [9] and Annex [5].

## Section 9: Methodology (5) Consistency with the Local Plan Strategy and Site Selection

### Introduction

- 9.1 This section sets out how the boundaries which have been selected, including the identification of allocated sites, are consistent with the Local Plan Strategy for achieving sustainable development. In terms of strategic sites, it explains how the potential impact on Green Belt purposes of developing land has been appraised, including the role of Heritage Impact Assessments in minimising green belt harm. It also describes the approach to offsetting any harm arising from the development of allocations, through compensatory improvements to the environmental quality and accessibility of remaining green belt land

### a) The Local Plan strategy and the approach to site selection

- 9.2 As set out in Section 7 and in line with SP10 (where there are development needs for the authority which cannot be met within the existing urban areas of York or neighbouring local authorities, the most sustainable locations for development should be identified), in seeking to address development needs over the Plan period, the Council has sought to ensure that it has identified as many sites as possible for consideration in the urban area and optimised how this is used before considering other Greenfield and Green Belt alternatives. **The Council has fully examined all reasonable options for meeting its identified need for development and concludes that it would not be possible to meet the Objectively Assessed Housing Need (OAN), Employment Land requirement, Education and Gypsy and Traveller Housing Need in York without releasing land from the general extent of the Green Belt.**
- 9.3 It was clear that land outside the main urban area and other urban areas would have to accommodate need. The boundary setting exercise has sought to establish the extent to which these needs could be accommodated whilst balancing the benefits of a location close to urban areas (SP8 and SP9), with the need to protect the character and setting of York (SP10 and SP11).
- 9.4 In order to deliver the development requirements ('drivers' for growth) over the plan period and beyond to ensure the Green belt boundary does not need to be altered at the end of the plan period, the approach to spatial distribution of development is informed by the application of spatial principles to identify and direct development to locations that are suitable and sustainable to meet the identified need, as per Section 7c.
- 9.5 The site selection methodology (SSM) underpinning the identification of suitable sites in the SHLAA and ELR firstly, uses 'sieve thresholds' based on site size to identify those sites too small for consideration (under 0.2ha) and those which are large enough to have the opportunity to enhance and/or connect into existing facilities and transport routes (accessed sustainably) as

well as identify those which could provide commensurate facilities and connections to be self-contained (be self-sustaining). Secondly, it sets out a two-stage suitability process that was undertaken in order to establish the potential sites most suitable for development. This process comprised:

- SSM Stage 1: Sustainable Location Assessment applying the Local Plan spatial principles (and SP10); and
- SSM Stage 2: Technical Officer Group to apply site specific specialist knowledge (and SP11).

- 9.6 SSM Stage 1 comprised a desktop assessment using GIS based data to accurately determine the site's location relative to the spatial principle criteria (see SD049 for the detailed methodology and Figure 3.1-3.1 in CD001). This firstly comprised an assessment of a sites location relative to environmental criteria (criteria 1-3) and secondly, their proximity to sustainable travel modes, facilities and services (criterion 4) if identified as being outside of the environmental areas. Criterion 4 sought to ensure that new development is well related to the main built up areas as the baseline evidence shows that most services (such as primary schools, secondary schools, nurseries, doctors, supermarkets, grocery stores and shopping parades) are within the urban/ main built up area. A scoring system was also applied to ensure only those sites with good accessibility were taken forward for consideration as site allocations in line with SP9 (i.e. where there are development needs for the authority which cannot be met within the existing urban areas of York or neighbouring local authorities, the most sustainable locations for development should be identified).
- 9.7 Where sites passed SSM Stage 1, they progressed to SSM Stage 2 Technical Officer Assessment. This comprised specialist Technical Officers from around the Council providing site specific comments, which further sieved out the most suitable sites. Where sites were identified to be over 5ha and failed the assessment for proximity to sustainable travel modes, facilities and services, the sites progressed to Stage 2 on the basis they would be large enough to have the opportunity to enhance and/or connect into existing facilities and transport routes / provide commensurate facilities and connection. Additionally, evidence supporting rejected sites was appraised and a judgement made on whether this justified the site as being suitable.
- 9.8 It is important to appreciate that the site selection process has been iterative, with several stages of site identification and consultation to enable feedback on the methodology and (re)appraisal of each site, if required. Following the initial 'Call for sites' in 2012, sites adjacent to each other were amalgamated on the basis that larger sites may improve feasibility and viability for provision of services and transport connections. However, individual sites (re)submitted through the Preferred Options Consultation (2013) or subsequently were (re)assessed for their potential and the outcomes were published at the succeeding stage.
- 9.9 Some site promoters/developers, particularly with site areas over 5 hectares, have submitted multiple representations at different stages of consultation to refine or provide alternative boundaries to those previously considered by

Officers. These refinements and/or alternatives have evolved over time principally to respond to site specific evidence and technical discussions to help safeguard the size and compact nature of the city, the perception of York being a freestanding historic city in a rural hinterland, key views towards York from the ring-road and the relationship of the main built up area of York to its surrounding settlements.

- 9.10 Additionally, the baseline data for this assessment was updated in 2016 to reflect any changes which may have occurred in relation to facilities and transport provision since the original baseline data gathering in 2012/13 as part of the 'Call for Sites' and published in the Site Selection Paper (2013) [SD072].
- 9.11 To ensure a consistent suitability assessment for all sites over 0.2 ha submitted for consideration for development since 2012, the four-part criteria assessment was re-run for all 989 sites identified on the SHLAA database. Where sites which had not previously been considered or now passed the updated criteria assessment, technical officer comments were collated allowing all sites to be assessed on a comparable basis.
- 9.12 To be transparent, the Stage 1 criteria assessment outcomes for the 989 sites considered are published as Annex 2 to the SHLAA (2018) [SD049B] and specify whether the sites pass or fail criterion 1-3 and criterion 4, including for sites between 35-100ha. Annex 6 to the SHLAA [SD049B] sets out the audit trail of residential sites which passed the criteria assessment and the reasoning for allocation or rejection of the site, including for sites between 35-100ha.
- 9.13 All reasonable sites and alternatives were subject to a tailored site assessment criteria as shown in Table 5.4 of the Publication Draft Sustainability Appraisal (2018) [CD008]. Proposed/ potential strategic site allocations and alternative sites (including their boundary alternatives) over 5ha and inclusive of sites between 35-100ha, have also been subject to a more detailed assessment against the SA objectives wherein the appraisal considers consideration of the baseline evidence, heritage impact assessment (HIA), evidence submitted for the site as well as technical officer comments (as per para 5.5.8-9 [CD008]). This reflects their potential importance to the delivery of the spatial strategy, their capacity to generate significant effects and the need to consider in more detail the opportunities for the delivery of on-site services and facilities commensurate to the scale of development. The audit trail for housing and employment is published as Appendix K to the Sustainability Appraisal (2018) [CD009D]. This audit trail draws upon SSM Stage 1 (criteria assessment) and SSM Stage 2 (Technical Officer Assessment) of the SHLAA process.
- 9.14 As per Section 7, the Gypsy and Traveller and Travelling Showpeople requirement is set out in the Gypsy and Travellers Accommodation Assessment Update (2017) [SD059] and translated into policies H5 and H6 of the Local Plan. These policies include bespoke criteria for determining the

future location of sites which will ensure they are well related to the urban area. Sites will be permitted where they:

- *do not conflict with the objective of conserving and enhance York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;*
- *ensure accessibility to public transport and services;*
- *are suitable in terms of vehicular access and road safety including internal space for adequate parking and turning;*
- *ensure that development does not have an undue impact on the residential*
- *amenity of current residents and future occupiers, including leading to unacceptable levels of congestion, pollution and air quality; and*
- *appropriately manage flood risk.*

9.15 The Local Plan takes the strategic view, endorsed by Historic England, to deliver a development strategy which looks to accommodate growth through maximising the use of urban (brownfield) land and limiting peripheral growth, to safeguard key elements of the City's special character and setting. Historic England note that the proposed strategic approach, accommodating some of York's development needs as new freestanding settlements and in the site allocations as identified, will result in far less harm to the special character and setting of the historic city than would be caused by development on the edge of the existing built up area.

### **b) Appraisal of impact of development on Green Belt purposes**

9.16 The site selection process identified suitable sites for housing, employment, gypsy and travellers and travelling showpeople in sustainable locations (SP10). Having regard to paragraph 80 of the NPPF (2012), Purpose 4 is the primary purpose for the York Green belt (SP1) and was taken into account as part of the process of site appraisal involving the following:

- 1. Appraising the impact of potential sites against the spatial strategy** (through the site selection process; see section 9a);
- 2. Appraising the impact of a potential sites against the principles of the Heritage Topic Paper in Heritage Impact Appraisals (SP6) and within the Sustainability Appraisal** (at each key stage of consultation);
- 3. Determining a clear, defensible boundary, applying the boundary methodology against green belt purposes set out in Section 8.**

9.17 Potential sites and their reasonable alternative sites were identified through the site selection process. Other sites were rejected which impact on environmental sensitivity and lack of sustainable development.

- 9.18 The potential sites identified were subject to a site specific Heritage Impact Appraisals (see section 9c below) to assess overall impact on the purposes of Green belt and harm to the historic character and setting of the city (SP6). This appraisal uses all of the principle characteristics set out in the Heritage Topic Paper [SD103] to identify where there was potential harm to the York Green Belt (SP6 and SP7, Section 5) and whether this harm could potentially be mitigated. The Sustainability Appraisal considered the HIA under objectives 14 (Historic character and heritage assets) and 15 (Landscape and Setting) to identify those which would cause the least harm to the York Green Belt as well as mitigation to protect the historic character and setting, if necessary. Using these assessments, the proposed sites taken forward were regarded as causing the least harm to the historic character and setting of the city (SP11)<sup>10</sup>.
- 9.19 **Annexes 3 and 4** present the detailed analysis of site boundaries which abut the existing main urban area, villages or industrial estates in relation to impact on the Green belt and suitability against the Local Plan Strategy. For those sites which are free standing, this analysis is presented in **Annex 5**.

### **c) Role of Heritage Impact Assessments in Minimising Harm to the Green Belt**

- 9.18 As set out in Section 5, the Heritage Topic Paper [SD103] identifies six “principal characteristics” of the historic environment that help define the special qualities of York (and that set the City apart from other similar cities in England) . In order to understand how policies, strategic sites and allocations in the Local Plan, as well as reasonable alternative sites, impact on these qualities, a Heritage Impact Appraisal (HIA) (2017) was undertaken [SD101]. The HIA uses the framework of characteristics set out in the Heritage Topic Paper to assess the potential level of harm (SP6) and importantly, where adverse impacts are identified, the appraisal goes further to identify possible mitigation measures to conserve or enhance the special characteristics of the city.

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<sup>10</sup> See particularly Sustainability Appraisal [CD008/CD009], Executive Report 17 July 2017 [SD027], Preferred Sites Consultation [SD018]

**Figure 15: HIA Assessment Structure**

Policy Theme or Site	1. Strong Urban Form	2. Compactness	3. Landmark Monuments	4. Architectural character	5. Archaeological complexity	6. Landscape and setting	Likely Impacts	Mitigation
Eg Section 3 Spatial Vision								
<b>Impact Key:</b>								
	<b>Significant Positive:</b> Potential for significant positive benefit through enhancement as well as adding value.							
	<b>Positive:</b> Potential for positive benefit through enhancement as well as adding value							
	<b>Minor harm:</b> Potential for harm to historic character and significances but identified policy framework in place to provide mitigation							
	<b>Serious harm:</b> Highly likely to cause significant harm leading to loss of historic character or substantial harm to its significance.							
	<b>Neutral:</b> Negligible impact and negligible benefit							
	<b>Unknown:</b> There is insufficient information to determine an impact							

- 9.19 The HIA (2017, SD101] appraisal of the spatial strategy identifies that:
- Policy SS1 *“guides development to brownfield sites, with emphasis on protecting the character and setting of the City and its wider historic and natural environment. It continues to focus growth on York City Centre, further enhancing the city’s compactness. In doing so, in general terms, the policy sets out to safeguard the special qualities of York”.*
  - Policy SS2: *“describes the primary purpose of the Green Belt as to preserve the setting and the special character of York. It is noted that the spatial approach removes safeguarded land, and instead provides for green belt permanence through allocated sites delivering to at least 2038”.*
- 9.20 Appraisals of Strategic sites is covered in two parts. The Strategic Site policies are assessed in Section 2, wherein consideration is given to identify harm from potential development, and how the principles required to be delivered as part of the policy, deal with this harm and/or mitigate the impacts. The assessment of the Strategic Sites location and size without mitigation is set out in Section 3 with key recommendations/mitigation required resulting from the assessment.
- 9.21 The HIA sites appraisals have been undertaken iteratively to inform the Council’s understanding of spatial distribution resulting from the appraisals in the site selection process and Sustainability Appraisal. This has provided an understanding as to how o the location and size of development directly relate to impacts on the principal characteristics of Compactness, Landmark Monuments and Landscape and Setting that are relevant to keeping land

permanently open which are directly applicable to the openness of the Green Belt as set out in Section 8 and Section 5 (SP7).

- 9.22 This evolution of the spatial strategy and spatial distribution also considered changes in the drivers of growth, the outcomes of public consultation and the impact on the spatial distribution/ boundaries of potential land use allocations. Notably, concerns were raised in relation to the boundaries of draft allocations prior to submission by statutory bodies. Relevant to spatial distribution was Historic England's response in earlier consultation drafts stating that the portfolio of potential allocations identified, specifically some of the large urban extensions, were harmful to York's historic character and setting as they did not reflect the historic settlement pattern of a compact urban form surrounded by a clock face of smaller settlements.
- 9.23 City of York Council worked with Historic England to understand its concerns relating to the draft allocations through workshops and the Heritage Impact Assessment process. As a result of this, several of the allocations became free standing settlements as opposed to urban extensions to ensure that York's urban area remained compact and new settlements fit with the existing settlement pattern. As a result, the spatial distribution was refined and the spatial distribution option taken forward in the Local Plan was to prioritise development within and/or as an extension to the urban area and through the provision of new settlements.
- 9.24 The approach to prioritise development in this way has been endorsed by Historic England, most recently in its response to Local Plan Publication consultation (2018), which states:  
*"We welcome the intention to limit the amount of growth which is proposed around the periphery of the built-up area of the City. Such a strategy will help to safeguard a number of key elements which have been identified in the Heritage Topic Paper as contributing to the special character and setting of the historic city. These include its compact nature, the views towards the City from the ring road and the relationship of the City to its surrounding settlements...(whilst acknowledging impact on the openness of the Green Belt in those locations) a strategy in which part of York's development needs are met in new free-standing settlements beyond the ring road would help to safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built-up area of York to its surrounding settlements."*

#### **d) Offsetting through compensatory improvements to the environmental quality and accessibility of remaining Green Belt Land**

- 9.25 As part of Section 3: Spatial Strategy, the Local Plan sets out site specific policies for each strategic site (above 5ha) which include criteria to ensure that the sites are designed to create sustainable communities and mitigate harm.

- 9.26 As part of these policies there is a requirement to deliver significantly enhanced public access to high quality open space. This enhanced access may be to areas of open space both within and adjacent to the allocations but will also allow enhanced access to the areas of green belt beyond the site boundaries. Additionally, Policy GI6 (New Open Space provision) establishes that the Council has mechanisms in place to secure green infrastructure provision in the city and allocates significant new areas of open space in conjunction with a number of the proposed strategic site allocations. This new open space will be complemented by further on-site provision of local green and open space.
- 9.27 Where applicable, the strategic policies also seek to ensure the mitigation outlined from the Heritage Impact Appraisals specific to that site are mitigated through principles in the policy to be demonstrated in master planning and applications to deliver the site allocation. These principles work with policies set out in Section 8: Placemaking, Heritage, design and Conservation to ensure high environmental quality and supports the character and setting of the city.
- 9.28 The Council, through the implementation and delivery of the Plan, is committed to supporting and implementing projects that will seek to offset a proportion of the impact on the Green Belt. Further detail on sites is provided in Annex 5.

## Section 10: Enduring Boundaries and Safeguarding

10.1 In drawing up and defining Green Belt boundaries authorities should consider boundaries having regard to their intended permanence in the long term (NPPF paragraph 83). The Council also needs to consider “whether it is necessary to identify areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”; and “whether the Council is satisfied that Green Belt boundaries will not need to be altered at the end of the development plan period” (NPPF paragraph 85; see too paragraph 83). In accordance with Strategic Principle SP12, the York Green Belt boundaries will be created that do not need to be altered at the end of the Plan Period (2033).

### **a) How the Local Plan’s proposed Green Belt boundaries will endure beyond the plan period**

10.2 National policy does not stipulate an identified finite period for Green Belt boundaries to endure; how far they should endure beyond the immediate plan period is a matter of judgement, having regard to factors including the extent to which reliable judgements can be made about the potential future needs for which provision needs to be anticipated. In the circumstances of this plan, the council considers that an approach which expects to deliver development for at least 5 years beyond the end of the plan and thereby create a Green Belt which **should remain unchanged for at least 20 years**, is sound.

10.3 The submitted Local Plan is based on a 16-year plan period from 2017/18 to 2032/33. It allocates specific sites and enables the redevelopment of land through policies SS3, SS4, SS5, EC1, H1, H5, H6, H7, ED1, ED2, ED3, ED4 and ED5 to meet the needs of the plan period and beyond into the longer term. The Council therefore **proposes a Green Belt that will endure for a minimum of 20 years** and will not need to be altered at the end of the Plan period (SP12).

10.4 Table 4 identifies those sites which are considered to be the most suitable and sustainable as identified through the Local Plan site selection process (SP10) and identified as causing the least harm to the green belt, as per section 9b and SP11. Overall, the table includes 21 sites identified in the Local Plan (2018) that sit within the general extent of the York Green Belt and are all therefore considered to have some impact on the openness of Green Belt and on the purposes set out in the NPPF. The sites identified provide sufficient land for 7,773 dwellings and 151,850 sqm of employment floorspace (more than addressing the identified shortfall set out in section 7).

**Table 4: Sites identified in the general extent of York's Greenbelt**

<b>Residential sites, Inc. provision for Gypsies and Travellers</b>						
<b>Location</b>	<b>ALLOCATION</b>	<b>SITE NAME</b>	<b>Site size (ha)</b>	<b>Potential Residential Units</b>		<b>Total (2017-2038)</b>
				<b>Delivery in Plan Period</b>	<b>Beyond plan period to 2038</b>	
Freestanding settlement	ST7	East of Metcalfe Lane	34.50	840	5	845
Urban extension	ST8	Land to the North of Monks Cross	39.50	968	0	968
Urban extension	ST9	North of Haxby	35.00	735	0	735
Freestanding settlement	ST14	Land to the West of Wigginton Road	55.00	1260	88	1,348
Freestanding settlement	ST15	Land to the West of Elvington Lane	159.00	2380	959	3,339
Village extension	ST31	Land to The South of Tadcaster Road Copmanthorpe	8.10	158	0	158
Village extension	ST33	Station Yard Wheldrake	6.00	147	0	147
Urban extension	H6	Land to the Rear of the Square	1.53	0	0	0
Village extension	H29	Land at Moor Lane Copmanthorpe	2.65	88	0	88
Village extension	H31	Revised Eastfield Lane Dunnington	2.51	76	0	76
Village extension	H38	Land RO Rufforth Primary School Rufforth	0.99	33	0	33
Village extension	H39	North of Church Lane Elvington	0.92	32	0	32
Village extension	H53	Land at Knapton Village	0.33	4	0	4
Village extension	SP1	The Stables, Elvington		3 plots	-	3 plots
<b>Total</b>				<b>6721 + 3 plots</b>	<b>1,052</b>	<b>7,773</b>
<b>Employment sites:</b>						
<b>Location</b>	<b>ALLOCATION</b>	<b>SITE NAME</b>	<b>Site size (ha)</b>	<b>Employment SQM</b>		

Freestanding employment	ST26	South of Airfield Business Park	7.6	25,080
Urban extension	ST27	University of York	21.5	TBC – Campus East and ST27 will across both sites deliver up to 25ha of B1b knowledge based businesses
Urban extension	ST37	Whitehall Grange	10.1	33,330
Urban extension	ST19	Northminster Business Park	15	49,500
Urban extension	E16	Poppleton Garden Centre	2.8	9,240
Freestanding employment	E18	Towthorpe Lines	4	13,200
<b>Total</b>				<b>130350 + quantum at ST27</b>

## Housing

- 10.5 Of the 21 sites identified within the general extent of the Greenbelt, there are seven strategic sites (over 5 ha) and six general housing allocations (between 0.2ha – 5ha) identified to meet the established housing need. Together these are anticipated to deliver 7,773 dwellings with 7,540 dwellings to be delivered on Strategic Sites and 233 dwellings to be delivered on general site allocations.
- 10.6 The inclusion of these sites in the housing trajectory together with the identified urban sites [EX/CYC/16] indicates that there is the potential to deliver 16,685 homes over the Plan period to 2032/33 (inclusive of extant planning permissions and a 10% non-implementation rate). The difference between this and the housing requirement of 13,152 dwellings is 3,533 dwellings. The Council considers that in terms of housing supply, there is appropriate headroom to ensure that the plan remains robust in the event that there is slippage in the delivery of housing from the allocated or committed sites.
- 10.7 The housing trajectory shows that a further 2,421 dwellings will be delivered beyond the plan period to 2038. Projecting forward a housing need of 790 dpa, there is a need to provide sufficient land to achieve a minimum housing requirement of 17,102 dwellings to ensure that the Green belt boundaries do not need to be altered at the end of the plan period. This is based on a number of the strategic housing allocations delivering over a longer time period and the continued delivery of windfall development (169 dpa) beyond the plan period. This means the Plan will deliver 19,106 dwellings overall providing an oversupply of 2004 dwellings. Additionally, ST36 'Imphal Barracks' is identified to deliver a further 169 dwellings beyond 2038. This effectively demonstrates that the Council can determine Green Belt permanence beyond the plan period for a minimum of 5 years.
- 10.8 The approach taken is aimed at ensuring that the Plan is robust and has some flexibility over timing and the ability to adapt to rapid change (and unforeseen

circumstances over the plan period - see NPPF Paragraph 14). The Plan needs to be robust and capable of meeting unexpected contingencies such as delivery failure or slippage in one or more sites. The range of sites proposed needs to be effective over the lifetime of the Plan and have regard to potential changes in circumstances.

- 10.9 Thus if insufficient land is released from the Green Belt and sites fail to come forward as expected this could jeopardise the fulfilment of the Plan's objectives to deliver sufficient quality housing to meet the identified needs over the plan period, by means of flexible housing supply.

### **Employment land**

- 10.10 Four Strategic Employment Sites (over 5 ha) and two general employment allocations have been identified to fulfil the established employment requirements in the Employment Land Review (2017). In total, this will deliver 130,350 sqm plus a further quantum at ST27.
- 10.11 The Council considers that the outcomes of the 2019 forecasting [EXCYC29] continues to positively support the level of job growth as set out in the Local Plan for 650 jobs per annum over the plan period and can be used to project need beyond the plan period to ensure that green belt boundaries can endure.
- 10.12 In total the plan allocates 239,230 sqm of employment floorspace plus a quantum on ST27, to be determined through master planning on the 25ha across both the existing campus east and new extension (see Education: University of York). It is important to note that reference to 'up to 25ha' reflects the 2007 planning permission at campus east, much of which is yet to be delivered. It is also important to note that, in line with the planning permission, development at campus east is restricted to a development footprint of 23%. Applying this to the 25ha of B1b use results in 5.75ha. The number of square meters of development which can be delivered on this footprint is determined by the height of the building. The council is therefore satisfied that the supply for employment land requirements has been identified to meet demand over the plan period (180,170 sqm) (B uses).
- 10.13 To ensure appropriate flexibility in the employment land requirements for a Green Belt, which will not need to be altered at the end of the plan period, the average land requirements identified in the ELR to provide 650 jobs pa, were projected forward by 5 years to 2038. Requirements projected to 2038 identified an additional requirement for 31,094sqm/6 ha to create a total need of 211,264 sqm/ 34.3 ha of employment land for Business uses (B1/B2/B8) and 231,239 sqm/38.1 ha overall (inclusive of B uses and D2 uses). This is a net requirement taking consideration: Planning permission between 2012-2017; a vacancy factor of 5%; and an additional 2 years supply.
- 10.14 Overall, the total allocations in the plan provide a minimum additional 28,166 sqm of Business use floorspace than the required demand of 211, 264. The flexibility built into the employment delivery is regarded is required to allow for

failure of sites to be delivered and to support and allow for choice and churn within the employment sector. This also ensures permanence to the Green Belt beyond the plan period for a minimum of 5 years.

### **Gypsies and Travellers and Travelling Showpeople**

- 10.15 As per section 7, the Gypsy and Traveller Accommodation Update 2017 [SD059] sets out the additional pitch and plot needs for those households who meet the planning definition as defined in PPTS (2015), for those unknown households where an interview was not able to be completed (refusal or not present after 3 visits to each site) who may meet the definition, and for those households who do not meet the definition. The GTAA Update (2017) concludes that there is a need for a total of 3 pitches for those Gypsies and Travellers meeting the Planning definition and 3 plots for showpeople to 2033.
- 10.16 The three existing Gypsy and Traveller sites in the authority (Layerthorpe, Clifton and Osbaldwick) are either within, or adjacent to the existing urban area. Capacity has been identified within or adjacent to these sites (inset from the Green Belt) to accommodate the 3 additional Gypsy and traveller pitches required to meet the defined traveller need within the lifetime of the plan as set out in PPTS (2015), in line with emerging Local Plan Policy H5.
- 10.17 Provision is also made to meet the requirements for 3 additional plots for travelling Showpeople within the life time of the plan, on land at The Stables, Elvington (allocation SP1 [CD001], in line with policy H6). This land is adjacent to Elvington Airfield Industrial Estate where 1 plot has existing temporary consent, which would be made permanent through this allocation.
- 10.18 Whilst the Council is not required to meet the needs of gypsies, travellers and travelling showpeople who do not meet the planning definition through the provisions of specific pitches/plots, the Council has taken a responsible approach that aims to address all traveller accommodation needs. This equates to a maximum additional need for 44 pitches for gypsies and travellers who do not meet the definition over the plan period.
- 10.19 In this regard, the Plan makes provision for Gypsies and Travellers through policy H5:
- through safeguarding existing supply;
  - through strategic site allocations (sites over 5 ha), whether on-site, on alternative land or through providing commuted sum payments to the development of pitches elsewhere; this is to accommodate the 44 Gypsy and Traveller households that do not meet the Planning definition.
- 10.20 Additionally, the plan makes provision for travelling showpeople through policy H6:
- through safeguarding existing supply;

- through provision of travelling showpeople yards within existing and allocated employment sites provided it will not lead to a loss of land needed to meet employment needs over the plan period.

10.21 As set out in Section 9, the suitability of the location of any further sites for Gypsies, Travellers or Travelling Showpeople, which come forward during the plan period will be determined in accordance with criteria i - v of Policies H5 and H6. Importantly, this includes not conflicting with the objective of conserving and enhance York's historic and natural environment and ensuring accessibility to public transport and services.

10.22 The approach taken by the Council allows for flexibility without impacting on the openness or permanence of the green belt. Allocations are intended to address assessed defined housing need, with provision for those who do not meet the definitions accommodated through delivery of strategic sites. In addition to this both policy H5 and H6 support planning applications for new pitches in suitable locations, within the scope of criteria based policy.

10.23 At the phase one Hearing Sessions (December 2019) the council proposed that modifications to policy H5 could be made, in order that clause b) be changed to apply as a cascade rather than as selective options. This would mean that sites and planning applications over 5ha would need to provide on-site pitches to meet the need of Gypsies and Traveller households that do not meet the planning definition, unless proven unviable. In addition it was suggested that policy GB4 ("Exception' Sites for Affordable Housing in the green Belt") could also be modified to clarify that it makes provision for small scale affordable sites for Gypsies and Travellers not meeting the PPTS definition This would allow additional flexibility in addressing the future housing needs of these groups. Unlike a rural exception site, exception sites for affordable housing in the Green Belt can be mixed use, accommodating yards for Showpeople where appropriate in the context of policy. . See proposed modifications submitted.

## **Education**

10.24 As set out in Section 7, the Local Plan supports the provision of educational facilities across the authority in line with development. Where educational facilities are within the Greenbelt; these are being dealt with as follows.

### Primary and Secondary education

10.25 Primary and secondary provision will be accommodated through Strategic Sites or on land to be identified at a future date when need is established. Where a specific need for an educational establishment has been identified as a result of strategic site development, this has been included into the bespoke strategic site policy principles against which the sites are expected to deliver (Local Plan Section 2 [CD001]). Where provision is to be on sites within the Green Belt, this is detailed within the respective proformas in Annex 5.

## Higher and Further Education provision

### *Askham Bryan College*

- 10.26 The site is located within the Green Belt. It is considered important to maintain the current green belt status of the land and any future development must not have a greater impact on the openness of the green belt than the existing development. This is dealt with through Section 6 and Annex 4.

### *York College*

- 10.27 York College is located on the edge of the main York urban area and will require additional land that is currently within the general extent of the Green Belt to allow the expansion of the existing built development beyond the existing site boundary. On this basis, additional land has been incorporated into the college designation (see policies Map south [CD004b]). The college boundary now incorporates land to the east to allow for expansion of the college site to be within the urban area. See Annex 5 for a detailed proforma.

### *York St John University*

- 10.28 There has been ongoing dialogue between the Council and York St John University through iterative consultation on the Local Plan to understand their growth needs up to and beyond the plan period [CD013A].
- 10.29 As set out in “The Approach to the defining York’s Green Belt - Addendum” (para 7.51 [EX/CYC/18]), this university is an urban campus which expects to meet its educational and related needs through the development and redevelopment of its existing campuses supported by policy ED4. While there is a recognition of the need to provide additional student housing in locations which are well related to the existing campus, and for additional sports facilities, this has been met on identified sites within the urban area and is supported by policy ED5. Further provision of student accommodation is supported through policy H7 where it meets the identified locational criteria.

### *York University*

- 10.30 Site allocation ST27 allows an expansion to the University of York to accommodate growth of Campus East in conjunction with land for employment use. The expansion of the University Campus is recognised to support the overall ambitions of the University over the plan period.
- 10.31 The Council has sought to strike a balance between providing sufficient land to allow the University to grow and to give longevity to the Green Belt boundary, alongside ensuring the special character and setting of York and its villages is preserved and enhanced. The University’s strategy for growth over 20 years from now is naturally not fixed. It is considered that the land allocated, together with the remaining capacity at campus east provides the university with sufficient flexibility to decide how to develop future growth. Whilst a larger site was considered, it was ultimately reduced to the proposed allocation size of 21.5ha following the removal of land to the west of Green Lane to increase the distance between the site and Heslington Village and also to provide a defined green belt boundary which helps to maintain views into the southern aspect of York and the setting of Heslington village. A large

number of consultation responses were also received objecting to the larger site, highlighting that this area forms part of the attractive setting of the city and Heslington village, and that the larger site would bring development closer to the ring road which will harm the character and setting of the city.

10.32 The Council consider that sufficient land has been allocated to allow the university to grow and that the identified quantum of land provides for future needs of the university in combination with capacity and churn on both campuses. The Council therefore consider that the resultant Green Belt boundaries offer permanence to 2038. See Annex 5 for a detailed proforma.

### **b) The need for safeguarded land**

10.33 The NPPF advises that Councils should “where necessary” identify areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.

10.34 The option to safeguard land was considered by the Council through the Preferred Options consultation in (2013) [SD005]. At the Preferred Options stage, two options were considered by the Council for safeguarded land as part of considering the Role of York’s Greenbelt, with Option 4 the preferred approach:

- Option 3: Identify sufficient development sites for the duration of the Green Belt; and
- Option 4: Identify sufficient development sites for the duration of the plan, safeguarding land to provide options for future consideration during the life time of the Green Belt.

10.35 Given alternative land was submitted through the Preferred Options consultation, alternative safeguarded land parcels and the approach to determining safeguarded land was consulted on through the Further Sites Consultation (2014) [SD015]

10.36 Responses to both of these consultations strongly supported a preference in the Plan to be clearer and more precise in identifying how and where development should occur in the long term. This opinion was expressed by both the local community (who have previously expressed concern about the need for and concept of ‘safeguarded land’) and from developers/landowners in respect of the provision of suitable and deliverable sites in the context of the policy requirements<sup>11</sup>.

10.37 Following a review of the land and allocations identified subsequently, some of the land, which was considered for safeguarding previously has been incorporated in the strategic allocations identified in the plan. The remaining

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<sup>11</sup> See CD013A - City of York Local Plan Consultation Statement Regulation 22 (May 2018)

land and/or previously identified safeguarded land was removed from the plan. This approach was confirmed in the Preferred Sites Consultation (2016) [SD018], which stated:

*“The preferred options consultation draft of the Local Plan and the (subsequently abandoned) publication draft that was considered by Cabinet on 25th September 2014 included a policy and allocations of safeguarded land. This land is intended as a reserve for considerations for development at the time of a subsequent Plan review. Its purpose is to help ensure that the Green Belt as defined in the Local Plan endures beyond the Plan period.*

*There has been considerable debate about both the need for such land to be designated and the duration of a ‘permanent’ green belt. The preferred options draft Local Plan and the subsequent publication draft sought to apply the national and saved regional policies in setting out the extent of the Green Belt and identifying a reserve of safeguarded land to ensure that the Green Belt boundary was capable of enduring beyond the Plan period for 10 years. This was to ensure that the Plan was fully NPPF compliant and to reduce the risk of challenge.*

*This document seeks to identify sufficient land to accommodate York’s development needs across the plan period, 2012-2032. In addition, the Plan provides further development land to 2037 (including allowing for some flexibility in delivery) and establishes a green belt boundary enduring 20 years.*

*In addition, safeguarded land is no longer designated. Figure 2 shows the safeguarded land previously identified in the aborted Publication Draft Local Plan) rather several of the Strategic Sites identified in the document have anticipated build out time beyond the fifteen year plan period. This ensures that we can meet long term development needs stretching well beyond the plan period and that green belt boundaries will not need to be altered at the end of the plan period.”*

- 10.38 This approach provides certainty to the local communities and developers whilst also allowing for more comprehensive place shaping and master planning of development to provide sustainability communities in the long term.
- 10.39 As set out in section 10a, many of the strategic allocations have anticipated build out times beyond the plan period and there is headroom identified for both employment and housing development against the identified requirements. This in combination with the oversupply identified to meet a minimum of 5 years beyond the plan period ensures that development can continue within York without the need to alter Green Belt boundaries the end of the plan period and that it can endure for at least 5 years, in accordance with SP12.
- 10.40 Additionally, the windfall assessment [SD049] identifies increasing trends over both the longer and shorter term for conversions and changes of use completions. In light of relaxed permitted development rights relating to office conversions being made permanent and evidence of substantial numbers of unimplemented consents from this source of housing supply, there is also qualified anticipation that the 169 dpa projected as part of the housing trajectory is conservative.

10.42 The Council consider it is therefore **not necessary to designate safeguarded land** to provide permanence to the Green belt. The Council considers the proposed approach provides greater certainty than safeguarded land, while providing the required permanence for the Green Belt in the longer term in accordance with the objectives of national policy and vision to deliver sustainable development and create sustainable communities.

## Section 11: Conclusions

- 11.1 The updated TP1 Addendum report has been prepared further to:
- Phase 1 of the hearings into the examination of the City of York Local Plan held at York Racecourse held in December 2019;
  - The submission of a Green Belt Clarification Note [EXCYC39] on 8 June 2020 by the Council - relating to 'homework' agreed during the above hearings on Green Belt matters;
  - The Inspectors letter to the Council [EXINS15] on 12 June 2020 regarding the proposed green belt in the Local Plan.
- 11.2 The original TP1 addendum was prepared and added to the York Local Plan Examination Library on 9 May 2019 - referenced as 'EX CYC 18 Green Belt TP1 Addendum'. Six annexes are also referenced as EX CYC 18 a-f in the library.
- 11.2 There are three principal groups of changes that are reflected in this document.
- 11.3 First, the changes relate to issues that have been confirmed through the Examination process, in particular that:
- the general extent of the York Green Belt is already established (via Saved Regional Spatial Strategy (RSS) policies and the key diagram) - and the Local Plan is not, as a matter of general principle, seeking to establish a new Green Belt
  - the Local Plan is tasked with formally defining the detailed inner and (outstanding sections of the) outer boundary of the York Green Belt for the first time
  - the Local Plan is establishing, not altering, Green Belt boundaries
  - the proposed delineation of the boundaries is in general conformity with saved elements of the RSS (subject to the need for further detailed scrutiny of the proposed boundaries)
  - the Local Plan does not need to demonstrate exceptional circumstances for any of the proposed Green Belt boundaries, including those relating to the proposed housing allocations, or for "insetting" existing villages
  - the emphasis placed on the fourth NPPF Green Belt purpose (preserving the setting and special character of historic towns) is appropriate in the context of York
- 11.4 Secondly, the changes take into account the latest household projections and enduring boundaries.
- 11.5 These changes reflect the position of the Council regarding the latest household projections (see EXCYC43). Section 4 sets out the development requirements for the York Local Plan in the context of the more recently released 2018 Sub-National Population Projections (SNPP) and Sub-National Household Projections (SNHP). The impact of this updated evidence on the

proposed OAN has been explored through a Housing Need Update 2020 (“HNU” 2020). Section 10 of the Updated 2021 TP1A sets out an updated explanation of how the Green Belt boundaries will have a permanence that endures beyond the plan period (2033), in light of development needs which reflect the HNU 2020. The proposed Green Belt will endure for a minimum of 20 years and will not need to be altered at the end of the Plan period.

- 11.6 Thirdly, changes have been made to address the methodological concerns that were identified in the Inspectors’ letter of 12 June 2020.
- 11.7 The updated addendum simplifies and clarifies the methodology that has been adopted for setting York’s Green Belt Boundaries, revising the text to reflect this, and its revisions explain in more detail the conclusions on boundary-setting that have been reached as a result. This comprises this main report which addresses the concerns expressed in the letter. We have also updated the associated annexes to clarify against the methodology (Section 5 – 8) the detailed justification of the boundaries identified (Annexes 3-5). Whilst the same evidence and approach underpin the original and updated 2021 TP1A, Annex 1 sets out the evidence considered more clearly.
- 11.8 Table 5 provides detailed consideration for how this update addresses the six principal concerns set out in the Inspectors letter of 12 June 2020. This clarifications’ table also examines how the issues had originally been addressed in the methodology published in March 2019 compared to how now included in this updated TP1A.
- 11.9 The final proposed York Green Belt boundaries within the authority area are illustrated in the associated annexes to this document, and provide a final boundary that does account for both long term permanence and supports the protection of the historic character and setting of the City of York.
- 11.10 Overall, TP1 Addendum required modification to provide clarity and explain more simply and directly how the evidence base was applied, using key criteria, principles and questions relevant to Green Belt purposes. It is considered that this report has addressed the concerns raised and that the updated TP1 Addendum now provides an appropriate methodology to justify the boundaries which have been proposed.

**Table 5: Clarifications Table**

<b>The Inspectors' Principal Concerns<sup>12</sup> [EXINS15]</b>	<b>March 2019 TP1 Addendum [EXCYC18]</b>	<b>January 2021 TP1 Addendum (Jan 21 TP1A)</b>
<p><b>1. Spatial shapers</b>            Significant concerns were expressed about the Local Plan Spatial Strategy “shapers” which have been taken into account though the plan making process, particularly in deciding where new development should be located. The Inspectors considered that a number of the shapers are of little direct relevance to the purposes of including land in the Green Belt (with examples given that air quality and flood risk should not have any bearing on the delineation of Green Belt boundaries).</p>	<p>Paragraph 3.10 is followed by a list of the key ‘shapers’ which have informed the Local Plan’s spatial approach and process of site selection.</p> <p>Paragraph 3.11 sets out that the Local Plan site selection process applied the key shapers to determine if suitable land could be found to accommodate York’s development needs.</p> <p>The summary of Section 3 states that emerging Local policy describes a series of ‘drivers’ and ‘shapers’ to guide sustainable development in York.</p> <p>Paragraph 5.31 sets out that on a strategic level openness has been addressed in relation to these directives through the</p>	<p>It is accepted that the delineation of detailed Green Boundaries needs to be clearly justified through an assessment of the role and function of land considered against Green Belt Purposes. Section 8 sets out a simplified and clarified explanation of the detailed boundary setting exercise - more expressly related to Green Belt purposes and strategic principles identified in section 5.</p> <p>The spatial shapers should not and have not determined Green Belt boundaries – they are shapers of the Local Plan Strategy. There is a link between the overall effect of Green Belt Boundaries and the promotion of sustainable development and ensuring consistency with the Local Plan strategy (NPPF paras 84 &amp; 85).</p> <p>Section 8 (f) summarises how the boundary setting exercise is consistent with the local plan strategy (which has been influenced by the spatial shapers.) Air quality and flood risk have had no bearing on the boundary setting exercise and this is the case for all the spatial shapers.</p> <p>There is overlap between the content of the Local Plan Spatial Strategy Policies and Green Belt Purposes. For example, the principles in Policy SS1 include conserving and enhancing York’s historic and natural environment and Policy SS2 sets out the role of the York Green Belt with a primary purpose “to</p>

<sup>12</sup> See EX INS 15 Inspectors Letter to Council 12 June 2020

	<p>Local Plan spatial strategy which sets out the drivers for growth and the shapers which direct its location.</p> <p>Paragraph 5.40 explains how the Local Plan’s ‘spatial shapers’ underpin Policy SS1 and that the aim of the spatial strategy is that these Spatial Shapers should be kept permanently open as far as possible to reflect the unique characteristics that shape the way the city has been developed and rich countryside environment in which it sits.</p> <p>Paragraph 5.41 adds that in determining the detailed boundaries of the York Green Belt these ‘shapers’ and site selection suitability processes have been carried forward by identifying land that fulfils a strategic function in meeting the purposes of Green Belt.</p>	<p>safeguard the setting and the special character of York and delivering the Local Plan Spatial Strategy”.</p> <p>It is accepted that Paragraph 5.31 of EXCYC18 is confusing and links openness with both the Local Plan drivers and shapers of growth. However, the shapers have not had a bearing on green belt boundaries. Paragraph 5.40 in EXCYC18 is confusing in terms of terminology and lack clarity as to what has influenced the Local Plan Strategy. Paragraph 5.41 is incorrect.</p>
<p><b>2. Maps showing most important areas</b>  In terms of Green Belt purpose 4 (“<i>to preserve the setting and special character of historic towns</i>”), an area of potential weakness in the evidence, by</p>	<p>Section 4 includes Figure 7: Strategic areas to keep permanently open – as a combination of Figures 3-6. Figure 3: Areas important to York’s special character and setting and Figure 5: Areas of</p>	<p>It is accepted that Figure 7 in EXCYC 18 and the related reference to identifying only the most important/broad areas has caused confusion. There is a lack of explanation in EXCYC 18 as to how these figures (and their identification of broad areas) formed part of a wider overall methodology for setting detailed Green Belt boundaries. Figure 7 in EXCYC 18 only tells part of</p>

<p>reference to the map produced to show parcels of land associated with that purpose (see Figure 6 and the composite map at Figure 7 particularly [EXCYC18]). Paragraph 4.17 of the Addendum says “<i>areas not identified on the appraisal map may still be important to the historic character and setting [of York]</i>”. The identification of only the most important areas on the map was an area of potential weakness in the evidence.</p>	<p>the city essential for preventing coalescence – are both based on the Green Belt Appraisal.</p> <p>Figures 4 &amp; 6 are: Access to services and York’s Green Infrastructure, Nature Conservation, Green Corridors and Open Space respectively.</p>	<p>the story and is heavily influenced by the Green Belt Appraisal work (by related Figures 3 and 5 in EXCYC18).</p> <p>Section 5 further explains the basis and intent of the Green Belt Appraisal work (and also the Heritage Topic Paper). The appraisal work only identified broad categories of land and the plans produced reflected this. The intent of the work was to only identify swathes of land which were understood at the time to be those of the “most” importance to purpose 4.</p> <p>The methodology for detailed boundary setting is set out in section 8 based on five criteria related to Green Belt Purposes 4,1 &amp; 3. Tables for each criterion demonstrate how strategic principles and detailed assessment questions have guided and informed the assessment of land for boundary setting. The evidence includes but goes beyond the Green Belt Appraisal. The Heritage Topic Paper and a range of further evidence sources along with site visits have all contributed to the assessment. In terms of purpose 4, Sections 5 &amp; 8 provide further explanation of how the Heritage Topic Paper [SD103] has been taken into account in identifying all areas that are considered to be important to the historic character and setting of York.</p> <p>Figure 7 in EXCYC 18 is not therefore representative of all the work undertaken to determine Green Belt Boundaries. The Local Plan Proposals map shows the overall results of the detailed methodology set out in Section 8 and the application of this methodology through Annexes 2, 3, 4 and 5.</p>
<p><b>3. Relevance of access to services</b> In relation to Green Belt purpose 1 (“<i>to assist in safeguarding the countryside from encroachment</i>” the Council</p>	<p>The Access to Services Map is included as Figure 4, which illustrates areas which have access to less than two separate services.</p>	<p>It is accepted that there has been an erroneous conflation of the spatial shaper of promoting sustainable forms of development (in terms of achieving good access to services and facilities) with Green Belt Purpose 1 and contributing to urban sprawl.</p> <p>The statement in EXCYC18 that development in the locations shown by Figure 4 (with poor access to services and facilities)</p>

<p>was not justified in relying on the proximity of shops and services (access to two or more services within 800m) as a means of determining whether the development of land would lead to unrestricted sprawl. This appeared to be an erroneous conflation of the “shaper” that is about “promoting sustainable forms of development” rather than informing this Green Belt purpose.</p>	<p>The figure is included with commentary in Section 4 with regard to Purpose 1.</p> <p>Paragraph 4.26 suggests that incremental development in such remote locations would exacerbate urban sprawl and that the identification of areas with limited services as among those to keep permanently open supports NPPF Green Belt purpose 1.</p>	<p>would exacerbate urban sprawl and the linking of the Access to Services Map is not correct in the context of Green Belt purposes.</p> <p>The Access to Services Map has been more appropriately used in Section 7 of the TP1A 2020 Update to demonstrate how the channelling of development into the main urban area and other built-up clusters is consistent with a sustainable approach.</p> <p>The Access to Services Map is not now included in Section 8 (and its consideration of Purpose 1 in defining detailed Green Belt boundaries). The assessment of land against Purpose 1 for boundary setting is explained in Section 8</p>
<p><b>4. Merging towns and coalescence</b> In relation to Green Belt purpose 2 (“to prevent neighbouring towns from merging into one another”), there are no towns of concern around York, such that any issues regarding the coalescence of smaller settlements and villages, where their individual identity is important to the setting and special character of York, should be considered under the fourth purpose.</p>	<p>EXCYC 18 did recognise that York does not have any major towns close to the general extent of the Green Belt and the potential issue of towns merging did not arise (para 4.27). However, issues related to the importance of the individual identity of different villages/urban areas surrounding the main urban area and the potential impacts of loss of separation between settlements were still linked to Purpose 2 (paras 4.28 - 4.30 and Figure 5).</p> <p>Purposes 2 and 4 were also linked in terms of evidence (page 31) and in Annexes 2 and 3.</p>	<p>It is accepted that Purpose 2 is not engaged. It is acknowledged in section 5 that the towns which lie beyond the general extent of the York Green Belt are distant from the City of York and are too far away at present as to raise any merging concerns.</p> <p>The potential for coalescence of smaller settlements is now solely addressed under Purpose 4 (see section 8) and under the associated following sub questions for Criterion 1, Compactness:</p> <ul style="list-style-type: none"> <li>- 1.2 Does the land need to be kept permanently open to maintain the scale or identity of a compact district or village; and</li> <li>- 1.3 Does the land need to be kept permanently open to constrain development from coalescing or by maintaining a connection to open or historic setting?</li> </ul> <p>References to Purpose 2 in Annexes 2 and 3, the outer and inner boundary sections, have also been removed</p>

<p><b>5. Implied influence of natural features</b></p> <p>Perhaps the most significant concern relates to Green Belt purpose 3 (“<i>to assist in safeguarding the countryside against encroachment</i>”). The concern was that from the both the Topic Paper [TP1] and the Addendum [EXCYC18] the following types of land have been identified as areas that should remain permanently open in relation to this Green Belt purpose:</p> <ul style="list-style-type: none"> <li>a) nature conservation sites;</li> <li>b) existing open space;</li> <li>c) green infrastructure corridors; and</li> <li>d) ancient woodland.</li> </ul> <p>The presence of any one of these features should not be considered to be an indication in itself that the land it occupies is inevitably ‘countryside’, let alone countryside that would be encroached into if it were to be developed. The again suggested a conflation of this Green Belt purpose and the “shapers” in the Local Plan -</p>	<p>The countryside around the main urban area of York was considered under purpose 3 (paragraphs 4.31- 4.38)</p> <p>These assets (Nature Conservation Sites, Existing Open space, Green Infrastructure Corridors &amp; Ancient Woodland) are set as being particularly relevant to the consideration of safeguarding the countryside from encroachment.</p>	<p>Section 8 more clearly explains how the function and role of land has been considered guided and informed by strategic principles and detailed assessment questions that relate Green Belt Purposes 4, 1 &amp; 3.</p> <p>A series of evidence base studies and documents including baseline maps, land use evidence and historical context have informed this exercise as explained in Section 8 and Annex 1.</p> <p>The four types of land/designations referred to form part of the wider land use evidence and provide one consideration respectively, alongside others, that have fed into the assessment of the role and function of land. Existing open spaces, designated Nature Conservation Sites and Green infrastructure corridors often have strong connections to the countryside. However, they can equally be located within built up areas. The Jan 21 TP1A clarifies that the identification of land within such categories does <u>not</u> determine that it necessarily needs to be kept permanently open.</p> <p>It is accepted that an Ancient woodland designation is not a feature of the <u>open</u> countryside – but serves as a general indicator as to the role and function of land and the presence or lack of urbanising influences.</p> <p>This corrects the statement at Paragraph 4.37 of EXCYC18 that such specific areas, “<i>which have an absence of built development, form important features of the open countryside and thereby should remain permanently open</i>”. This pre-emptive statement did not acknowledge the full detailed boundary setting exercise (as originally described in Section 5c of EXCYC18) and as now set out in Section 8 of the Jan 21 TP1A.</p>
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<p>which were not a robust substitute for a proper analysis of the degree to which land performs the Green Belt function in question.</p>		
<p><b>6. Role of the local assessment criteria</b>  The use of Figure 7 in the Addendum to illustrate the composite effect of assessing the Green Belt purposes was noted to result in the identification of land which was strategically important to keep open, but different from the boundaries resulting from the more localised assessments. The differences may indicate the application of appropriate planning judgment, but raised a further concern that the local assessment criteria did not have a clear and unequivocal connection to the Green Belt purposes. Examples included the local criteria for assessing whether land protects historic assets (including the presence or absence of listed buildings on the land) and also whether land serves a countryside function on the urban fringe (including</p>	<p>Figure 7 is included in Section 4 of EXCYC18, along with text which describes York’s Strategic Approach to the Green Belt by Green Belt Purpose.</p> <p>The methodology for defining Green Belt Boundaries is set out in section 5.</p> <p>Section 5c is titled “Developing criteria for boundary delineation” and a table under paragraph 5.27 sets out openness and permanence criteria. Evidence sources are identified in this Table against Green Belt purposes.</p>	<p>It is recognised that the content of Sections 4 and 5 of EXCYC18 has not clearly explained the approach to setting detailed Green Belt boundaries and both sections reference Green Belt purposes in different ways.</p> <p>Section 8 clarifies and conveys in one section the detailed methodology relied upon to assess and delineate the proposed Green Belt boundaries. Importantly Section 8 explains what strategic principles and detailed assessment questions were used for five criteria related to Green Belt purposes. It is accepted that section 5c of EXCYC 18 (and in particular the table in this section) and the annexes did not achieve this. The tables for the five criteria in Section 8 better explain the detailed boundary setting methodology and the associated results set out in Annexes 2 and 3.</p> <p>EXCYC18 set out strategic and local considerations for assessing land and boundary setting. The Jan 21 TP1A sets out how strategic principles were identified (in Section 5) and the application of the strategic principles and detailed assessment questions for the five criteria set out in Section 8.</p> <p>The Tables for each of the five criterion in Section 8 also demonstrate more clearly how the same evidence as described at Section 5c of EXCYC 18 relates to the different Green Belt Purposes and how it is been used to determine detailed Green Belt boundaries.</p> <p>The links between different sources of evidence and Green Belt Purposes (and different criteria for Purpose 4) is also</p>

<p>analysis of landscape character and the type of open space).</p>		<p>summarised in an updated Annex 1. A table showing these links has been added at the start of Annex 1, ahead of the GIS evidence maps which remain included.</p> <p>Expanded commentary is also included in Annexes 2 and 3, the outer and inner boundary sections, to explain in more detail the assessment of the role and function of land against Green Belt purposes 4, 1 &amp; 3.</p>
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