

Local Development Framework Working Group

4th October 2010

Report of the Director of City Strategy

LDF Core Strategy

Summary

1. This report follows on from the previous report on the Core Strategy considered by Members on the 6th September which highlighted a series of key issues relating to the Core Strategy arising from the changing policy context. It specifically seeks Members' views on potential alteration to the Spatial Strategy component of the LDF Core Strategy which will then be incorporated into the full Core Strategy document for approval by Members followed by consultation and submission for examination. This report is supported by technical annexes which are available in the Members' Library, on the Council's website and from the author of the report.

Background

2. As Members are aware the draft LDF Core Strategy produced at the preferred options stage was published for the purpose of public consultation in Autumn 2009 and reflected the national policy position at that time. In terms of housing numbers it was in conformity with the RSS. Employment growth was based on figures from the City of York's Employment Land Review (2009). Within the context of these levels of growth the Spatial Strategy component of the Core Strategy directed the future location of development by means of an approach based on three sequential components:
 - (i) **firstly**, prioritising development within York's main urban area; this included utilising the opportunities provided by the following major development opportunities and sites: York Northwest; Castle Piccadilly; Heslington East; Hungate; Nestlé South; Germany Beck; Derwenthorpe; Terry's and Layerthorpe area.
 - (ii) **secondly**, brownfield or infill development within the most sustainable larger villages; and

(iii) **thirdly**, potential areas of search. It was clear within the strategy that this was only necessary if insufficient land couldn't be provided under points (i) and (ii). The potential areas of search were subject to the following:

- preserving the historic character and setting of York;
- the appropriate management of flood risk to ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk from the Rivers Ouse, Foss and Derwent; and
- protection of areas with nature conservation value.

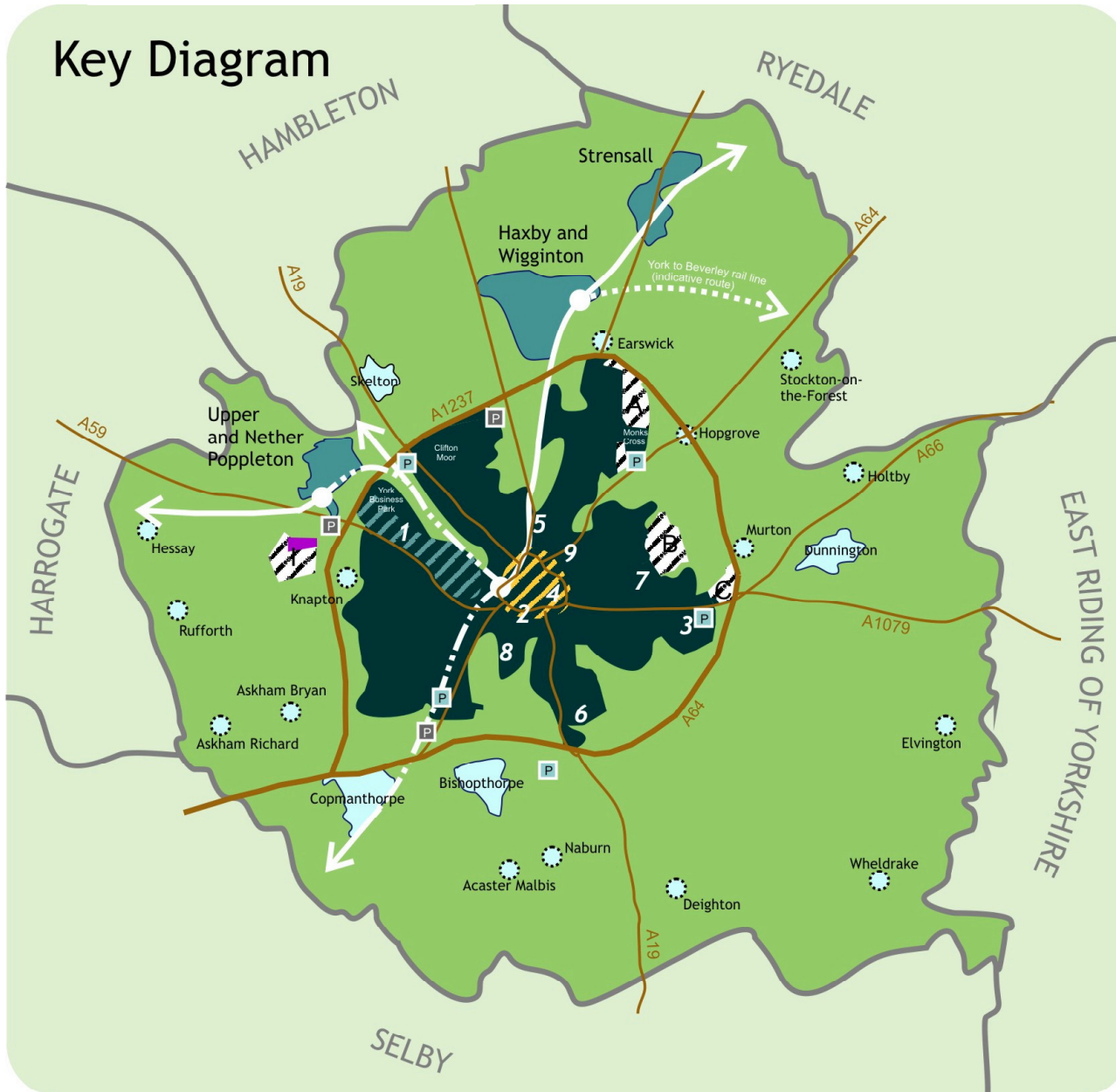
3. With regard to point three initially six potential areas of search where the main urban area could be extended were identified. Each was considered in more detail from the point of view of the following factors: implications for the transport network; sustainability; landscape character; agricultural land classification; open space; and further flood risk considerations. The end results of this process are highlighted in figure 1 and included the identification of four areas outside the main built up areas (A, B, C & I). Areas A and B for housing and C and I for employment.

4. The approach described above, as Members are aware, formed the basis of citywide consultation detailed in reports to the LDF Working Group in January and April 2010. This included:

- 90% of respondents supported the key constraints used to help shape the spatial strategy relating to green infrastructure, flood risk and historic character and setting, whilst 10% did not;
- 43% of respondents felt that York's economy should grow by 1000 jobs per year and 9% by more than this amount. 48% felt the number of jobs should be lower;
- 58% of respondents felt that we should be building less than 850 new homes a year, 33% agreed that 850 new homes per year should be built, whilst 9% felt it should be higher;
- around 60% of respondents felt that land should not be identified in the draft green belt for housing or employment. However, if we had to identify land in the draft green belt for housing, 67% of respondents felt that Areas A and B would be most suitable. 58% of respondents believed that Area C was suitable for industrial and distribution employment, whilst 41% agreed that Area I was suitable; and
- 77% of respondents agreed that we should be allowed to include a higher level of windfalls in the plan, whilst 23% disagreed.

5. It should be noted that representations were made by individuals including developers and landowners in favour of development in the draft Green Belt. A summary of consultation responses is provided in Annex 1 for information.

Figure 1



York - Sub-Regional City (main urban area)
Defined by RSS and relates to the main urban area of York as the focus of employment, housing, shopping, health, leisure, business and public service

Local Service Centres
The most sustainable settlements after York itself, ensuring good access to services, employment and public transport

Villages

- Small Villages

General extent of the proposed Green Belt

1 York Northwest
2 Castle Piccadilly (pp)*
3 Heslington East (pp)
4 Hungate (phase 1 pp)
5 Nestle South
6 Germany Beck (pp)
7 Derwenthorpe (pp)
8 Terry's
9 Layerthorpe area

*pp: planning permission granted

Potential Areas of Search

- A Monks Cross, Huntington
- B East of Metcalfe Lane, Osbaldwick
- C North of Hull Road
- I Northminster Business Park (nb existing employment allocation shown as I)

York North West Area Action Plan
City Centre Area Action Plan

P Existing/proposed new or relocated Park and Ride site*
*exact locations to be determined

Tram-train
Main rail network
Main road network

Change in Policy Context

6. 'Localism' has been a key feature of the newly formed Coalition Government. The localism agenda focuses on the decentralisation of power away from central government towards local communities and individuals. It dictates that people should have as much power as possible; from council services and planning decisions to selecting local policing priorities.
7. On the 20 May 2010 the Government published a document entitled 'The Coalition: Our Programme for Government' setting out their policy programme. This commits the Government to implementing an agenda that is underpinned by the principles of localism providing for a 'fundamental shift of power from Westminster to people...giving new powers to local councils, communities, neighbourhoods and individuals'¹. For planning, this means pledges such as abolishing RSSs to return decision making powers on housing and planning to local councils and reforming the planning system to give neighbourhoods more ability to determine the shape of the places people live.
8. The Queen's speech on 25 May 2010 introduced the Decentralisation and Localism Bill which will 'devolve greater powers to councils and neighbourhoods and give local communities control over housing and planning decisions'. The main elements of the Bill reflect the pledges made in the Coalition Programme for Government however there remains uncertainty regarding the application of localism and what this means for decision making. The draft bill is likely to be published in Autumn 2010 and is scheduled to be passed in November 2011.
9. The report considered by Members on 6th September highlighted the significant changes in policy context, specifically the announcement on 6th July by the Secretary of State for Communities and Local Government (CLG), Eric Pickles, which led to the revocation of Regional Strategies effectively therefore handing back to local planning authorities the direct responsibility for a series of policy decisions. Significant among these is the question relating to the level the council, as local planning authority, should set for its strategic housing requirement. This obviously requires the consideration of a range of factors that relate to housing including its links to employment growth and the extent of the Green Belt. There are three key issues considered further in this report.

Issue 1: The level of future housing

Issue 2: The level of future employment land provision

Issue 3: Options for identifying the extent of York's Green Belt

10. Each of these issues is explored in detail below along with potential options for York's Core Strategy.

¹ The Coalition: Our Programme for Government, HM Government, May 2010, Page 11

Issue 1: The Level of Future Housing

Housing Demand

11. Arup were commissioned to consider the level of population and household growth that should form the basis of future housing provision in York and its wider area. For Members' information the paper is provided as Annex 2. In particular, the work considered whether the RSS housing figures are still appropriate in light of the recession.
12. The review considered the following elements:
 - the evidence base for the RSS;
 - the latest evidence in terms of ONS population and CLG household projections;
 - the effect of the recession on the RSS estimates and on population and household projections (as all of these predate the recession);
 - the observed effect of trends in the housing market in terms of housing completions, house prices, affordability and housing capacity; and
 - the effect of the economy and economic growth on housing and migration.
13. Arup's analysis of this evidence indicated that:
 - i. it would not be appropriate to plan on the basis of a housing figure that is below the long term average of completions;
 - ii. the main impact of the recession on housing completions was in 07/08 and 08/09 and that the market began to recover in 09/10;
 - iii. as the 2006 based CLG household projections were based on trends associated with boom conditions it would not be unreasonable to suggest that they may overstate requirements;
 - iv. the 2003 based CLG household projections were based on trends more representative of an economic cycle and are therefore likely to be more soundly based (780 - 800 a year);
 - v. York is part of a wider housing market and actual demand will depend on the policies and housing provision approaches in neighbouring authorities. This also needs to consider issues of affordability and transport networks; and
 - vi. York has one of the stronger economies of the sub region and likely long term employment growth of around 1,000 jobs per annum is higher proportionately than trend housing completions, suggesting higher levels of in commuting.
14. The work concludes that an appropriate annual average would be 780 – 800 dwellings a year.

15. PPS3 states that LDFs should identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption of any plan. Based on the Arup figures the total housing requirement for York from the present to 2026 (16 years) would be 12,480 (at 780 a year) or 12,800 (at 800 a year). Although Arup acknowledge that in the medium term to around 2014/15, housing completions are likely to fall short of this figure and average around 640 dwellings per annum, it is likely that given economic recovery and an easing of credit markets, subsequent years may exceed this figure in a recovered housing market.
16. For means of comparison Table 1 below shows levels of housing completions in the City of York for the last ten years along with the ten and five year mean averages.

Table 1: Housing Completions

Year	Completions
2000/01	706
2001/02	1,002
2002/03	834
2003/04	525
2004/05	1,160
2005/06	906
2006/07	798
2007/08	523
2008/09	451
2009/10	507
Average (2000 – 2010)	741
Average (2005 – 2010)	637

17. Over the last 10 years completion levels average over 700 pa. The five year average is over 600 pa reflecting the more recent effects of the recession. Since the UK recession started in 2008 completion levels have been around 500 pa. Completion levels provide alternative housing requirement scenarios based on the actual level of house building activity that has taken place.

Housing Supply

Strategic Housing Land Availability Assessment

18. The potential supply arises from sites with consent, allocations and sites identified through the Strategic Housing Land Availability Assessment (SHLAA). Table 2 provides a list of these potential sites. More detail on each site is included in Annex 3.

Table 2: Known Sites and Potential Sites Identified through the SHLAA

SHLAA Ref.	Site	Number of Dwellings
Unallocated Sites With Permission		1122
Allocated Sites with Permission		
130	York College, Tech Site	313
119	Germany Beck	700
126	Minster Engineering	57
115	Hungate	557
128	The Croft Campus Heworth Green	55
127	Birch Park	193
334	Kennings Garage	19
120	Bonding Warehouse	2
106	Metcalfe Lane	540
Allocated Sites without Permission		
3	156b Haxby Road	15
116	Castle Piccadilly	20
117	Area North of Trinity Lane	31
118	Peel Street/Margaret Street Car Park	34
121	Burnholme WMC, Burnholme Drive	23
125	Reynard's Garage	12
129	10-18 Hull Road	43
40	Heworth Green South/Frog Hall Site	72
Potential Sites Identified in the SHLAA		
20	York Central	1780
13	British Sugar	1250
140	Terry's	395
276	Nestle South	235
15a	Former Bio-Rad Premises Haxby Road	153
54	Land at Frederick House East of Fulford	31
91	Land at Cherry Lane	16
108	Heworth Family Centre, Sixth Avenue	16
111	Asham Bar Park and Ride Car Park	68
150	Manor CE Secondary School, Low Poppleton Lane	141
151	Lowfield Secondary School, Dijon Avenue	183
195	Former Citroen Dealership - Lawrence Street	29
223	The Tannery, Sheriff Hutton Road, Strensall	94
29	Millfield Industrial Estate Wheldrake (1)	46
62	The Grange, Huntington Road	110
89	Land at Mill Mount	23
93	Rear of 62 Mill Lane, Wigginton	10
101	Land at Blairgowerie House, Main Street, Upper Poppleton	21
135	Council Depot, Beckfield Lane, Acomb	20

156	1 - 9 St Leonard's Place	25
219	22 Princess Road, Strensall	21
231	Land at Bootham Crescent	88
278	Site off Water Lane, Clifton	18
309	Yearsley Bridge Centre	53
202	Land to R/O 20a and 22 Mill Lane Wigginton	13
193	Barbican Centre	94
15b	Site to the North East of Nestle	367
277	Sutton Way/Lilbourne Drive	25
327	Former Garage 172 Fulford Road	13
225	Safeguarded Land Brecks Lane Strensall	150
18	Land West of Grimston Bar (Safeguarded Land)	254
21b	Monks Cross North	591
329	Our Lady's RC Primary School Windsor Garth	69
330	Sessions Factory Huntington Road	76
332	Millfield Industrial Estate Wheldrake (2)	99
333	ATS Euromaster 110 Layerthorpe	17
	Total	10,402

19. Sites identified in the supply have been subject to internal consultation to establish that there are no in principle objections to them coming forward for residential development. The majority of sites were identified through SHLAA Phases 1 and 2 and were considered by Members of the LDF Working Group in December 2007 and March 2009. Some new potential sites have emerged as a result of considering employment land requirements in consultation with the Economic Development Unit. This has led to the proposed reallocation of the employment sites at North of Monks Cross and the Millfield Industrial Estate in Wheldrake. It is proposed that the remainder of the North of Monks Cross employment allocation is considered as an area for residential development, following the rounding off of the existing employment area. Millfield Industrial Estate is a long standing employment allocation that has not come forward and it is therefore considered that it offers opportunities for residential development.

Windfalls

20. National guidance states that as part of the 15 year supply local authorities should identify specific deliverable sites to deliver housing in the first 10 years of the plan, and where possible for years 11-15. PPS3 states that allowances for windfalls should not be included in the first 10 years of land supply unless there is robust evidence of genuine local circumstances that prevent specific sites being identified. Generally, guidance makes it clear that local authorities in planning for housing land should not plan for a set level of windfalls, except in exceptional circumstances.
21. The assumption is that the SHLAA should identify most available sites and areas for the short and medium term that would previously have been accounted for in

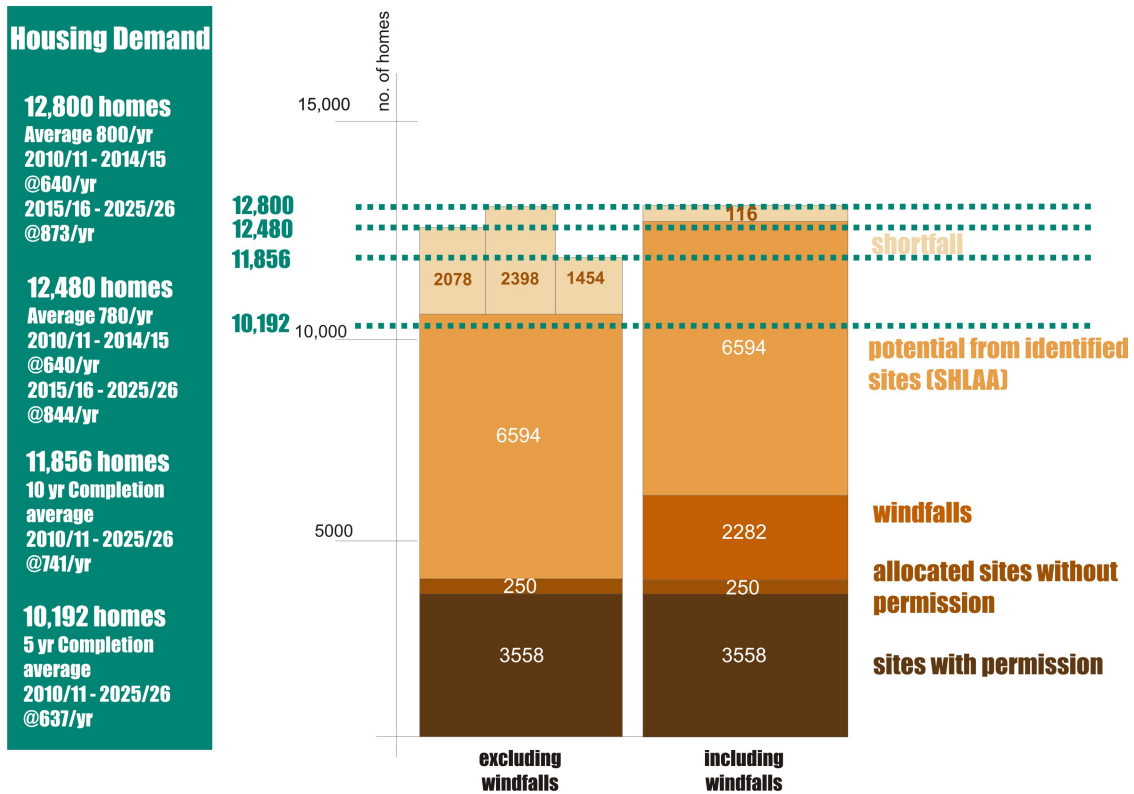
windfall calculations. The inclusion of windfalls in the land supply is therefore at risk. It is likely that windfalls of all sizes will continue to come forward in York over the plan period. Whilst there may be risks in including an assumption for windfalls in the trajectory they will provide an element of flexibility to the delivery of housing during the plan period.

22. Following previous comments by Members and citywide consultation responses a potential approach to windfalls could be to include an allowance that reflects historic rates of completions on very small windfall sites (less than 0.2ha) and changes of use or conversions. Both of these sources are too small to be picked up in the SHLAA, but nevertheless are characteristic of the types of sites that have come forward in York in the past. National guidance recommends a site threshold of around 0.4ha for SHLAA purposes. The York SHLAA uses a site threshold of 0.2ha to reflect the high number of smaller sites that have come forward in the past ten years.
23. Reflecting the spatial strategy settlement hierarchy and the focus of development on the main urban area and local service centres this allowance would equate to 169 windfalls a year (based on a 10 year trend in these areas). Developments on garden land which were previously counted as windfall development have been excluded from the calculations in line with the recent changes to PPS3 (June 2010).

Housing Trajectory

24. Figure 2 below compares the revised housing figures with the known and potential supply, including scenarios with and without windfalls.
25. Previous housing supply figures, such as those set out in the Core Strategy Preferred Options document, have included a figure for completions since 2004 because this was the start date for RSS. This element has now been removed following the abolition of RSS. The housing targets and supply figures now commence from this year (2010/11).
26. The windfall allowance has been phased in from 2012/13 to ensure adequate time for existing consents (for sites under 0.2ha) to be built out and thus avoiding the risk of double counting. The windfalls are also phased in over 18 months - i.e. discounted by 50% (85 per annum) in the first year (2012/13) and then 100% in the following year (2013/14) and onwards (169 per annum). This phased approach is used to account for the time taken for the windfall sites to go through the planning process.

Figure 2: Comparison of Housing Demand with Potential Supply Over a 15 Year Period



Issue 2: The Level of future employment land provision

Employment Demand

- To consider the level of employment growth that should form the basis of future employment land provision in York and its wider area the Council commissioned Arup to produce a second paper (Annex 4) to consider this issue, particularly in terms of the recession and public sector cuts. They considered Cambridge Econometrics work which underpins the 2006 employment land assessment by SQW and the Entec review of that work (2007). They also considered the former RSS figures alongside the long term trends in the York economy. In addition they also consider how well York has fared in the recession in the context of the wider regional and national economy and identified long-term relationships between trends in York and the wider economy. The conclusions from this work are summarised below.
- The Regional Econometric Model employment forecasts used in the adopted RSS were based on an optimistic scenario and also at a time of general optimism – before the recession and public sector spending cuts. It is therefore Arup’s view that the employment forecasts of 2,130 jobs per annum outlined in the adopted RSS are optimistic given the changes since the work was undertaken.

This also reflects the City of York Council’s previously stated views. In particular, whilst the UK has emerged technically from the late 2000s recession, macroeconomic conditions remain challenging with a lower trend rate of growth anticipated nationally over the next 3-5 years.

29. The more detailed localised employment forecasts produced for the Employment Land Review (ELR), an average of 1,067 jobs per annum, are judged by Arup to be of a more realistic level. The sectoral mix of employment growth assumed in the ELR also still appears sound for York’s long term planning. It is noted that pressures on public sector employment in the short to medium term may place greater reliance on private sector job creation.
30. A lot rests on the extent to which the private sector can expand and create employment, mitigating the contraction in public sector employment expected to arise from cuts of around 25% in public sector expenditure. Some evidence suggests that a 25% cut in public sector expenditure will lead to a loss of some 600,000 jobs nationally over the next 5 years. York does possess a higher than average proportion of employment in the public sector and therefore is potentially vulnerable to future cuts. Recent press releases also point toward a trend of rationalisation and associated job losses in the banking sector which could affect locations in Yorkshire.
31. Arup concluded, on the basis of their analysis of macroeconomic and fiscal changes since the ELR, that 960 additional jobs per annum was a realistic average figure for the period. It is expected that actual per annum jobs growth will fall short of this in the short to medium term 5 year horizon as the UK experiences muted growth. In the longer-term growth in the Science City sectors is expected to deliver higher levels of employment creation. In terms of employment land requirements, they therefore conclude that provision should be made on the basis of average annual jobs growth of 960 jobs not 2,130 as per the adopted RSS. This is more in line with the detailed local employment forecasts produced for the ELR. The scenario favoured by Arup generates a slightly lower employment land requirement compared with the ELR figures when considered without the margin of choice (41.08 hectares compared with 45.64 over the period 2006-2029). However, they suggest a larger margin of choice be adopted to enable sufficient ‘churn’ and fluidity in employment space in York - incorporating this results in their favoured scenario and ELR figures being very similar.
32. Given the view expressed in Arup’s work it seems appropriate to continue to use the previous forecasts used in the ELR. Table 3 below translates the forecast levels of employment growth identified in the ELR into a land requirement for key employment sectors.

Table 3: Jobs Change, Employment and Estimated Land Requirements

Use Class	Land Requirement	Land Developed 2006 - 2009²	Net Land Requirements
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² Completions on Employment Allocations and new additional employment sites.

	(ha) 2006 - 2026		2010 - 2026³
Offices B1(a)	12.53	3.5	9.03
Research and Development B1(b)	1.04	0.01	1.03
B1(c) , B2 & B8	28.54	10.8	17.74
Total	42.11	14.31	27.8

Employment Supply

33. Having established that approximately 1000 jobs per year and an associated land requirement will be supported through the LDF Core Strategy, it needs to be determined how these can be accommodated spatially. Table 4 below highlights the comparison of demand and supply in terms of quantity.

Table 4: A comparison of need and supply

Use Class	Net Land Requirements 2010 - 2026⁴	Identified Supply
Offices B1(a)	9.03	25.2
Research and Development B1(b)	1.03	25
B1(c) , B2 & B8	17.74	21.06
Total	27.8	71.26

34. The Settlement Hierarchy developed as part of the spatial strategy at the preferred options stage recognises the important role of York's main built up area providing a primary focus for employment activities and facilities. It also recognises the role of free standing existing employment sites. The sites identified through the ELR and other technical work falling within these spatial locations are highlighted in tables 5 to 7 below, the associated site plans are in Annex 5.

³ The Net figure includes an allowance for completions between 2006 and 2009.

⁴ The Net figure includes an allowance for completions between 2006 and 2009.

Table 5: B1(a) Office Sites

Site	Site Size (ha)
York Central	2.2
Hungate	0.48
Land Adjacent to Norwich Union	0.41
Terry's	1
British Gas	0.25
Omega 1	1.04
Southern Part of Nestle Factory	2
Land South of Great North Way YBP	1.37
Land North of Great North Way YBP	1.81
Land North of Monks Cross Drive	2.17
Vanguard	12.47
Total Supply	25.2

Table 6: B1(b) Research and Development Site

Site	Site Size (Ha)
Heslington East	25
Total Supply	25

Table 7: B1(c), B2 & B8 Light and General Industry, Storage and Distribution Sites

Site	Site Size (ha)
James Street	0.44
YBP Land forming SE	2.1
North Minster BP	14
Land SE of Murton Industrial Estate	0.45
Elvington Industrial Estate	1
Elvington Airfield Industrial Estate	0.87
Holgate Park	2.2
Total Supply	21.06

35. Within the supply identified York Central (a component of the York Northwest area) is highlighted as providing an opportunity for York to be able to accommodate, and significantly extend, the range and quality of its office accommodation. The site has been identified as an opportunity for developing a new office quarter in a highly sustainable location with excellent transport links both regionally and nationally. It is considered that the new office quarter could provide between 87,000-100,000 sq m of B1(a) office space. Other key sites for B1(a) Office include Hungate, Terry's, Nestlé, Monks Cross and the front of York Business Park. The Layerthorpe Area was also identified in the ELR as having

some potential for redevelopment although work in this area is not significantly advanced enough to identify a quantum of land.

36. The York Central site is of key importance in delivering the need for B1(a) Office in qualitative terms. In addition it should be noted that there are no sites other than Vanguarde bigger than 3 hectares that offer the opportunity for a large scale development scheme.
37. The ELR highlights that Heslington East, the University of York's new campus extension can accommodate all of the City's anticipated demand for free standing B1(b) Research and Development uses. Heslington East has permission to develop around 25ha of research and development uses in addition to the proposed academic and other university uses. Identifying a single site for this use would obviously lead to a lack of choice and may inhibit delivery.
38. Sites for B1(c) Light Industry, B2 General Industrial and B8 Storage and Distribution uses are generally located on the edge of the urban area. This includes existing sites such as York Business Park and the existing allocation at Northminster Business Park. Indeed the latter site is the only site over 3 hectares offering the opportunity for a larger scale development scheme. Sites in the rural area which have previously been allocated for employment uses such as Elvington and Murton are also included within the schedule. These sites did not figure highly in the ELR, however the Study recognised that they perform an important role as employment sites for local need and should be retained as such.
39. Given the existing supply there are several additional locations Members may wish to consider for employment use particularly in terms of meeting the City's needs in qualitative terms and provide flexibility in the future to respond to changing market conditions. These are highlighted below:
 - **Area of Search I (Northminster)** - the land designated as safeguarded / reserved land in the Local Plan around the existing Northminster Business Park was identified as a potential site in the ELR and could provide up to 30 hectares of land. [This could provide the flexibility required for B1a and B1b uses]
 - **Area of Search C (land to the North of Hull Road)** – a 29.5 hectare site currently within the draft Green Belt but identified within the ELR as a good location for industry, storage and distribution.
 - **North Selby Mine** – Comprises an approximate 10 hectare developable footprint, identified through the ELR as being well suited to the development of 'green technologies' for example, the development of renewable energy.

Issue 3: Options for identifying the extent of York's Green Belt

40. York has had a draft Green Belt since the 1950s. The general extent of the Green Belt has been formally adopted but its inner boundaries have not. It is a key role of the LDF to address this issue through setting the general extent and purposes of the Green Belt through the Core Strategy and detailed boundaries through the following Allocations DPD.

Purpose of Green Belt

41. National Guidance indicates that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. Green Belts help to ensure that development occurs in locations allocated in development plans. They help to protect the countryside, be it in agricultural, forestry or other use. They can assist in moving towards more sustainable patterns of urban development. There are five identified purposes of including land in Green Belts:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns from 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.

Permanence

42. The essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead. Once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. Where detailed Green Belt boundaries have not yet been defined, as in the case of York, national guidance indicates it is necessary to establish boundaries that will endure. It is therefore of key importance that there is sufficient land outside the Green Belt to meet an area's long-term needs. If boundaries are drawn excessively tightly around existing built-up areas clearly it may not be possible to maintain permanence.
43. The issue of permanence has been considered previously in the York context. In February 2000 the Government appointed Inspector formally adjourned the City of York Local Plan public inquiry that had opened in November 1999. This was done with the agreement of the Council following the publication of his interim report on the initial stages of the public inquiry. The Council had proposed a short term Green Belt within its Local Plan, with the proviso that the boundary would be reviewed once longer term development land requirements for the City were confirmed through the Structure Plan. The Inspector disagreed with the Council's approach indicating support for a Green Belt life of at least 20 – 25 years.

44. In addition, Government Office for Yorkshire and the Humber comments on the Core Strategy Preferred Options document highlighted that, when local planning authorities prepare new local plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan. They should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period.

Consultation

45. As highlighted in paragraphs 6 to 9 above 'Localism' is a key policy of the Coalition Government, effectively focusing on decentralisation of power away from central government towards local communities and individuals.
46. Under the localism agenda some councils have stopped making decisions and some developers have chosen to seek planning permission by appeal. CLG have indicated that local councils should define what localism means for their area. The Local Government Association indicates that interim guidance from the Government is needed to provide a sense of direction. Whilst at present the relative weight to be given to 'Localism' by a Government Inspector through examination into a LDF document is uncertain it can not be ignored.
47. Within the context of the LDF Core Strategy preferred options citywide consultation:
- around 60% of respondents felt that land should not be identified in the draft green belt for housing or employment.
 - if we had to identify land in the draft green belt for housing, 67% of respondents felt that Areas A and B would be most suitable. 58% of respondents believed that Area C was suitable for industrial and distribution employment, whilst 41% agreed that Area I was suitable.
 - 90% of respondents supported the key constraints used to help shape the spatial strategy relating to green infrastructure, flood risk and historic character and setting, whilst 10% did not.

Countryside Policies

48. When considering how to control the use of open land outside built up areas another option to using Green Belt is through Countryside Policy. Countryside Areas could be identified on proposal maps, and within such areas the focus would be on safeguarding, enhancing and promoting access to strategic green space, which has importance in terms of defining the city's character, supporting biodiversity, recreation and other benefits. Forms of development deemed acceptable in countryside areas would be controlled through the LDF, but could include:

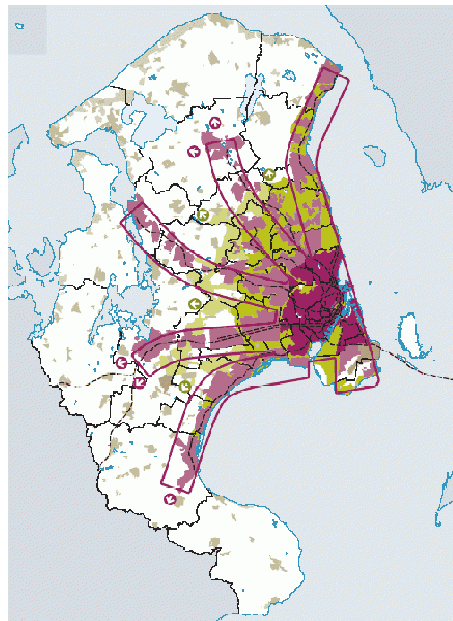
- affordable homes for local people (i.e. rural exceptions);
- rural conversions to housing;
- small scale community facilities/employment (based on sequential assessment and settlement hierarchy); and
- agricultural diversification.

49. Only in exceptional circumstances would land be taken out of countryside designations, through a review of the LDF development plan. This would require consultation, Member support and Public examination.
50. An example of an authority that has used this approach within the LDF system is Harrogate BC (policy attached as Annex 6 for information). This was considered at a public inquiry in April/May 2008 and forms a part of their adopted Core Strategy.

Green Barriers

51. Green Belts in the British sense tend to be an exception rather than the rule within mainland Europe. Whilst many cities aim to stop the excessive growth of urban areas there are generally no "circular belts", just "barriers". A potential consideration for York would be to use a combination of 'Countryside Policy Areas' and Green Belt to create such barriers.

52. An example of this type of approach is the Copenhagen Finger Plan of 1947 (shown right). This involves an urban structure focused on preserving the green spaces found around the city. It developed from the belief that urban development must be co-ordinated with public transport systems, which naturally led to a finger like structure which allowed the land between the 'fingers' to remain undeveloped. Although the original Finger Plan has changed and been modified over the last 50 years, the plan has always played a crucial role in the overall planning of the city.



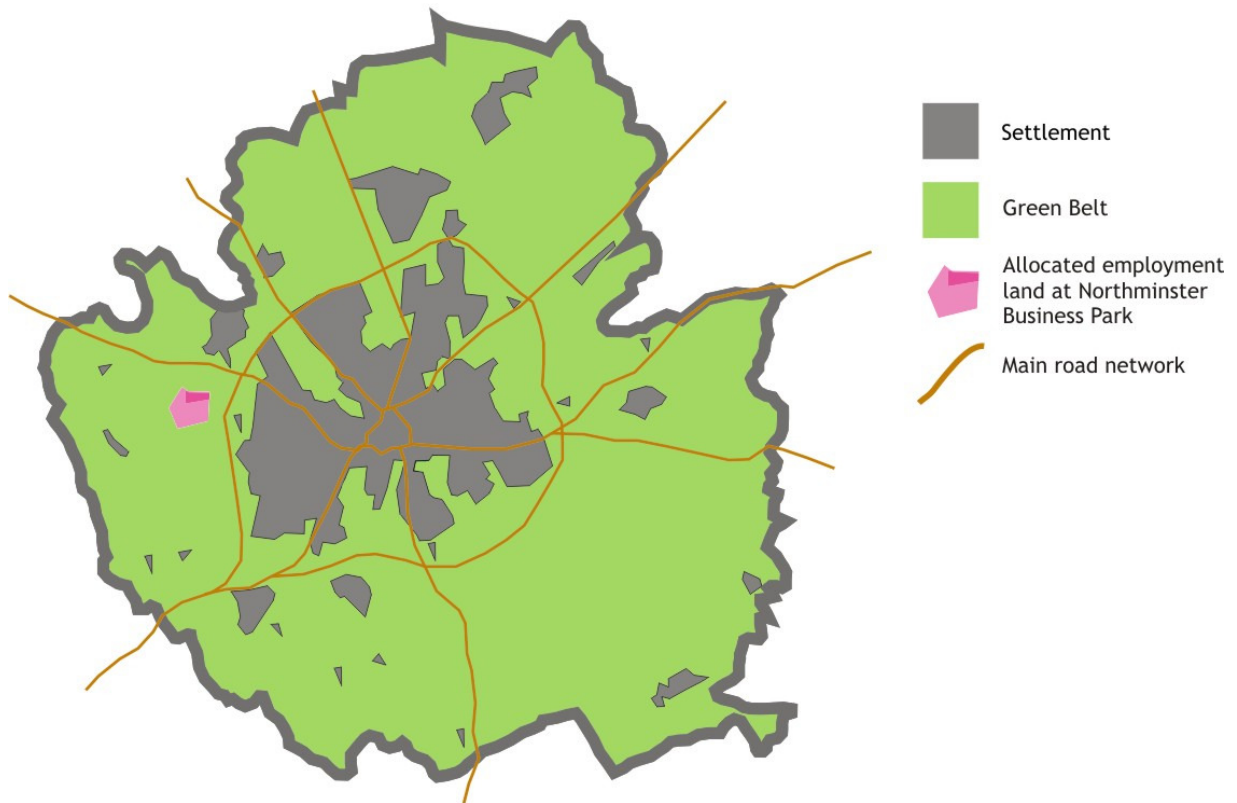
Summary

53. To help aid the consideration of this issue by Members officers have identified 4 headline options, although clearly there could be sub sets of each. All options broadly reflect the spatial strategy in that they concentrate the majority of growth on York itself, prioritise the use of brownfield land, and respect those tracts of green and open space which help characterise the unique setting of the historic City. Each

option is described below, then evaluated in table 8 in terms of five criteria arising from the points above (the diagrams included are for indicative purposes only):

- **Permanence** - A key feature of Green Belts is their permanence. Green Belts are intended to be a long-term designation.
- **Purposes of Green Belt** -The purpose of green belt, and its role in preserving the historic character and setting of York, and reinforcing York's compactness.
- **Localism and public response to consultation**
- **Flexibility** - Flexibility to allow for fluctuations in delivery on strategic sites, changing local housing needs, or to respond to development industry.
- **Role of land outside the Green Belt**

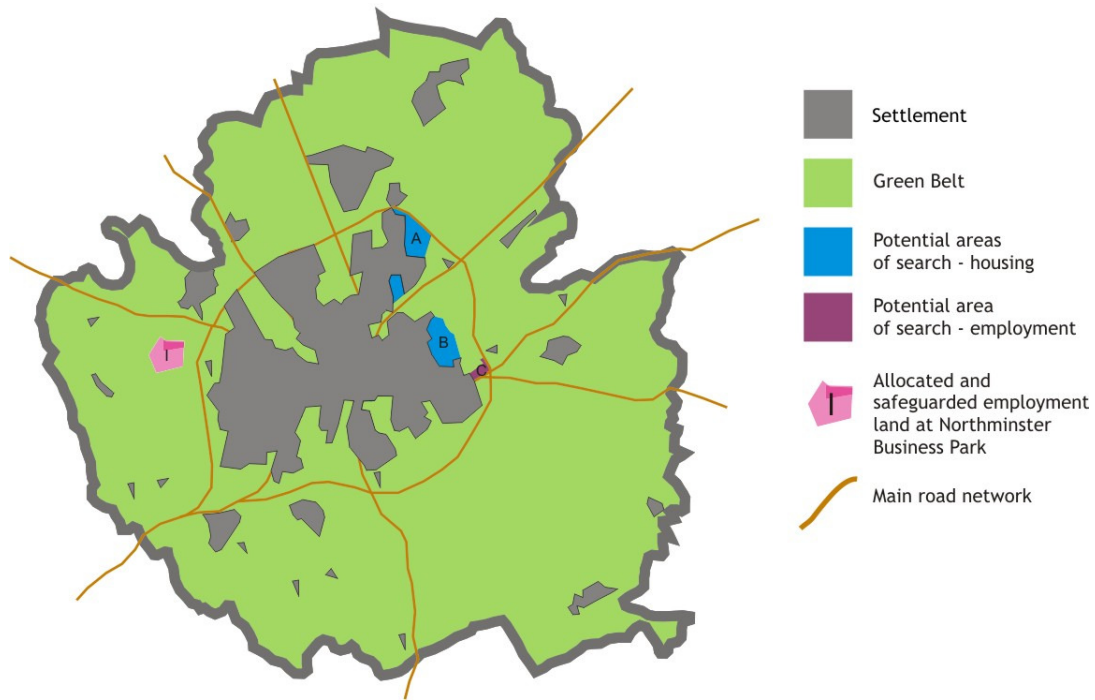
Option 1: Retaining the existing draft Green Belt in line with citywide consultation responses



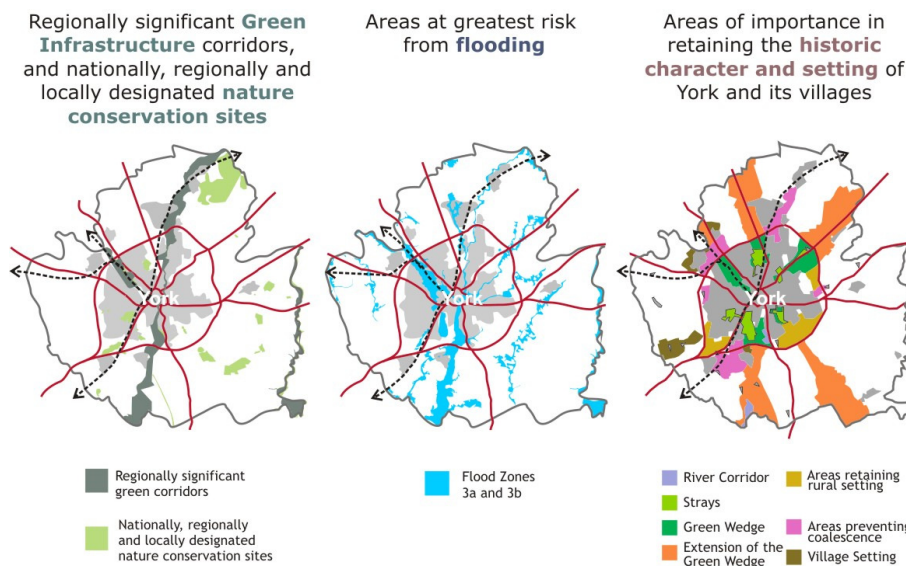
54. This option retains York's existing form, and represents a development strategy which prioritises the role of concentrated brownfield redevelopment within the City over alternative greenfield land releases. This option is heavily reliant on the delivery and phasing of identified strategic development sites (in particular York Central/British Sugar) and the inclusion of windfalls. Key considerations relating to this option are highlighted below.
55. Citywide consultation identified support for protecting the Green Belt and for building less than 850 new homes a year.
56. The lower housing figure produced by Arup (780pa) along with the inclusion of windfalls could combine with this option to produce a Green Belt that could endure for around 15 years. This would not allow for flexibility (for non delivery or lower delivery on identified sites) and not provide a Green Belt that could endure for around 20 years.

57. If the five year average housing completions figure (637 pa) along with the inclusion of windfalls was used rather than the figures recommend by Arup, this could combine with this option to produce a Green Belt that could endure for around 20 years. This would offer little flexibility for non-delivery or lower delivery on identified sites. Flexibility would require around a two years supply which would equate to sufficient land for approximately 1120 dwellings. Alternatively, the overall housing target would need to be closer to the average achieved for the last three years during the recession which ranged from 451 to 523 per annum.
58. Both the approaches described above allow for the inclusion of an allowance for small windfalls. Based on past experience, in reality small & larger windfalls are likely to come forward during the plan period. However for the reason described in paragraphs 20 to 23, including windfalls in the trajectory would be at risk for the point of view of the examination into the plan. In the first approach (780 target – 15 years) windfalls would account for 25 % of the future supply (without existing permissions) and in the second (637 target – 21 years) 30%.
59. This option could include or exclude the land currently identified around Northminster Business Park. The Local Plan currently comprises a 14 hectare employment land allocation and around 30 hectares of safeguarded / reserved land in this location. The Allocation is identified with in table 7 as helping to meet the need for b1 (c), b2 & b8 sites.

Option 2: Identify sufficient housing and employment land for at least 20 years, including areas of search as required (dependent on the responses to the issues highlighted above). Designating the remaining open land outside the built up areas as Green Belt.



60. This approach avoids land which is important in terms of the historic character and setting of York, at highest risk of flooding and of nature conservation interest (represented diagrammatically below).

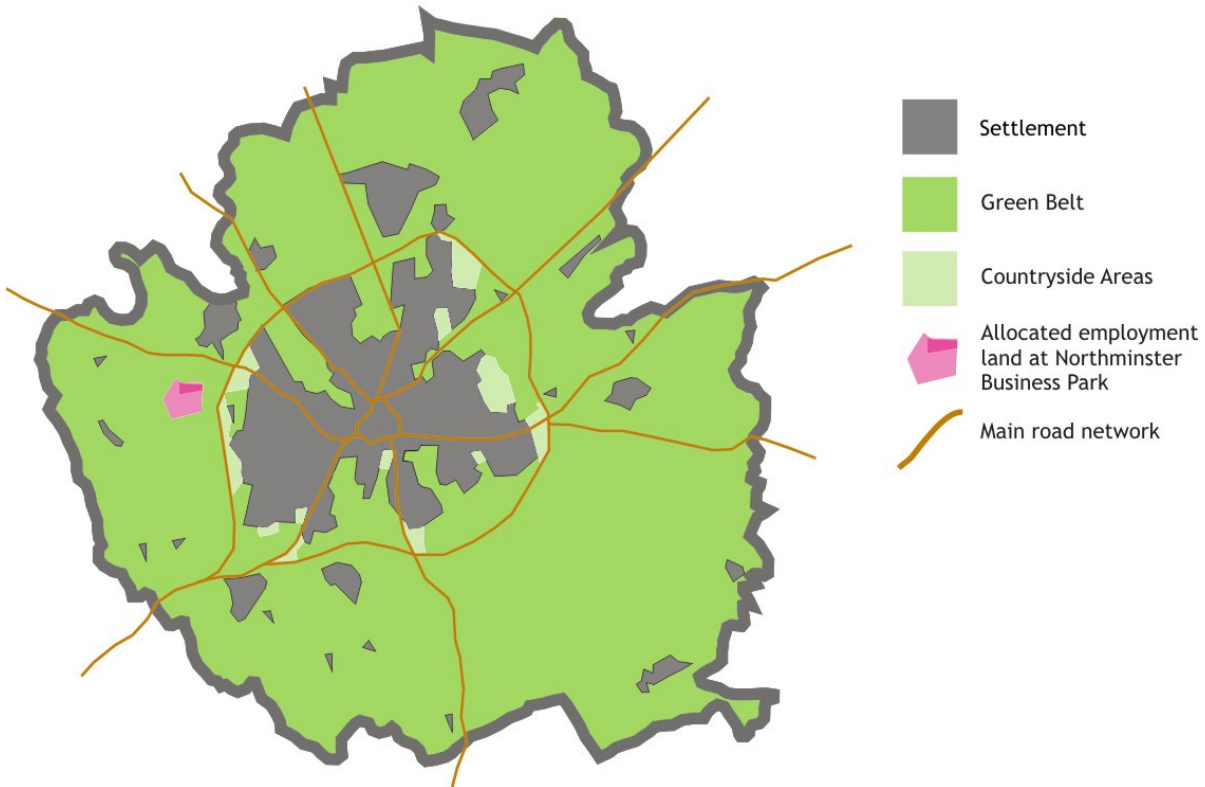


61. Areas A and B provide the potential to accommodate new homes in new neighbourhoods alongside a range of services, open space and infrastructure.

Comprehensive development on new neighbourhood scale could also help address service deficiencies within existing communities.

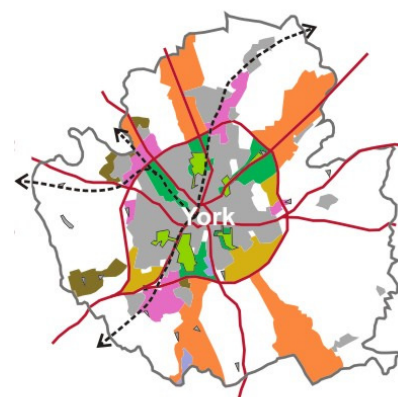
62. To address qualitative and quantitative demand for land for employment uses, particularly light and general industry, warehousing and storage/distribution, areas C and I would provide choice and opportunity for economic growth. This option also delivers a green belt capable of enduring 20 to 25 years.
63. From the perspective of housing, this option could be operated with or without windfalls. Regardless of whether an allowance for windfalls were included, it would require at least one area of search for housing (sequentially all or part of Area A). Choices could also be made with regard to inclusion of one or both of area 'I' and area 'C' for employment . Broadly this is likely to lead to a similar approach to that identified at preferred options stage for consultation. It should be noted that potentially it would not be necessary to include all areas of search A, B, C & I.

Option 3: Identify sufficient housing and employment land for 15 years. Undertake to keep all land outside the built up areas open for at least the duration of the plan, using Green Belt for those areas outside the ring road, but designating unconstrained areas within the ring road as Countryside Areas.



64. The designation of a long term green belt (20 or more years) would be based on preserving the historic character and setting of York. Land inside the outer ring road would be included within the Green Belt on the basis of the historic character & setting map (inset). All other land inside the ring road would be designated as Countryside areas. Land outside the outer ring road is identified as Green Belt given its role in preserving the compactness of York. This is a key long standing recognised component of York’s character, as illustrated by the following extract from York Green Belt Local Plans Inspector’s report:

Areas of importance in retaining the **historic character and setting** of York and its villages

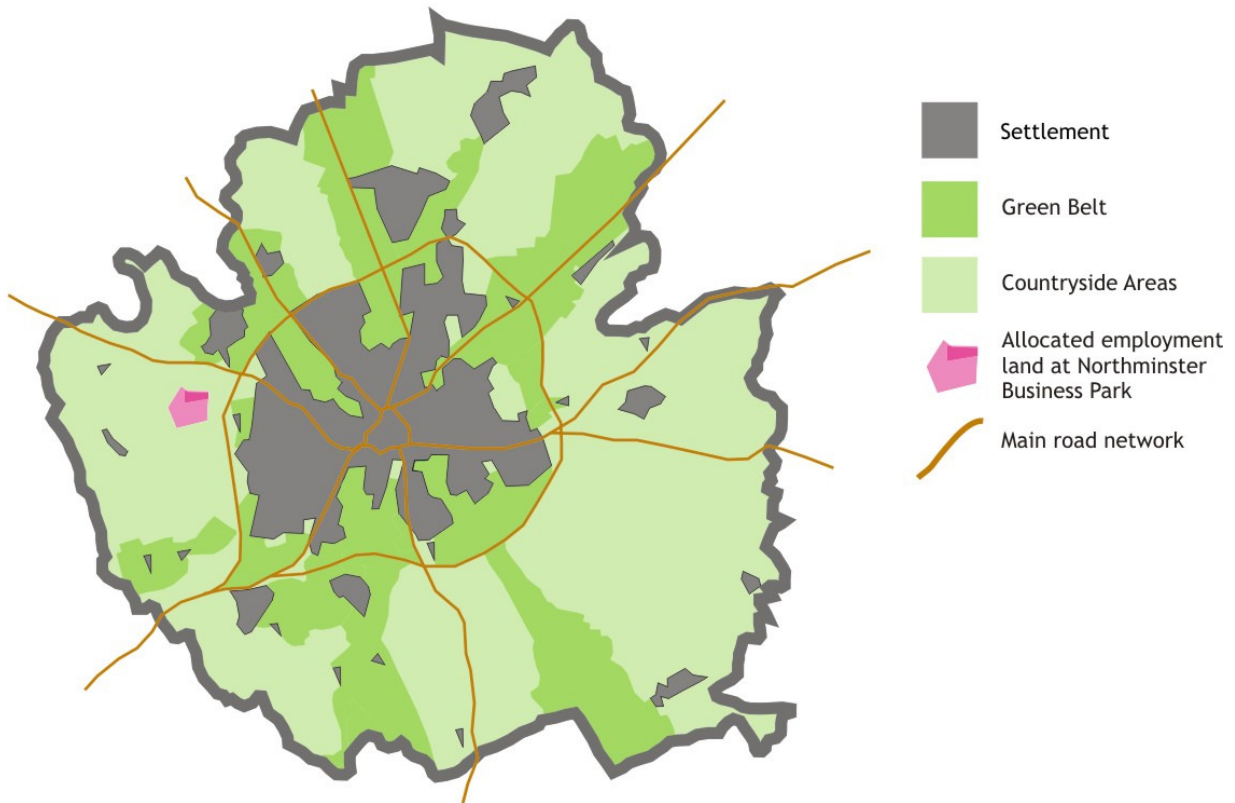


".....The setting of York within an area of open countryside containing a number of attractive villages is itself an important aspect of the special character of York, which of course it is the primary purpose of the Green Belt to maintain"

York Green Belt Local Plan Inspectors Report (Jan 1994)

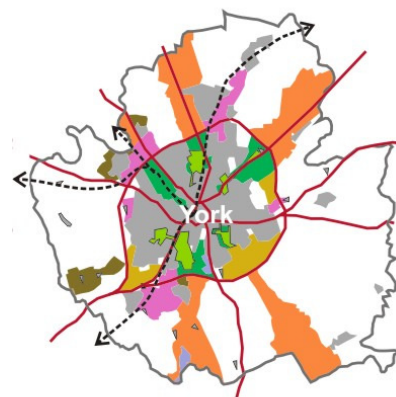
65. Other land within the ring road would be covered by Countryside policy. This approach would keep the land identified as draft Green Belt within the Local Plan as open land for the duration of the LDF Core Strategy. Any decisions to re-designate Countryside Areas would require the support of Members in light of prevailing evidence at that time, a review of the plan, consultation and public examination.
66. Introducing a countryside designation in York may lead to confusion about the role of these new areas, when compared with the Green Belt. The LDF would need to set out clear policies on both designations to ensure that the different roles are clear to the public.

Option 4: Identify sufficient housing and employment land for 15 years. Undertake to keep all land outside the built up areas open for at least the duration of the plan i.e. 15 years. Recognising the Historic Character & Setting of York as the key objective of York's Green Belt, designate those areas identified as performing that role as Green Belt and the remainder as Countryside Areas.



- 67. This option only designates land as green belt if it is identified as having significance to the 'historic character and setting of the City'. As such, it significantly reduces the hectareage of York's Green Belt in comparison with the draft Local Plan's Green Belt boundary. The remainder of land would be covered by Countryside policy.
- 68. It clearly sets out the primary purpose of green belt land for York viz. Preserving the City's Historic Character and Setting. This provides a robust basis for identifying and protecting Green Belt land.
- 69. This approach would keep the land identified as draft Green Belt within the Local Plan as open land for the duration of the LDF Core Strategy. As with

Areas of importance in retaining the **historic character and setting** of York and its villages



- Blue: River Corridor
- Yellow: Areas retaining rural setting
- Green: Strays
- Pink: Areas preventing coalescence
- Orange: Extension of the Green Wedge
- Brown: Village Setting

option 3, the status of areas covered by Countryside policy could only be altered with a formal review of the plan.

70. It would allow the Council to set long term permanent Green Belt boundaries enduring almost indefinitely.
71. Introducing a countryside designation in York may lead to confusion about the role of these new areas, when compared with the Green Belt. The LDF would need to set out clear policies on both designations to ensure that the different roles are clear to the public.

Table 8: A Comparison of Green Belt Options

	A key feature of Green Belts is their permanence. Green Belts are intended to be a long-term designation.	The purpose of green belt, and its role in preserving the historic character and setting of York, and reinforcing York's compactness.	Localism and public response to consultation	Flexibility to allow for fluctuations in delivery on strategic sites, changing local housing needs, or to respond to development industry.	Role of land outside Green Belt
Option 1	<p>An essential characteristic of Green Belt is their permanence. Once the general extent of a Green Belt has been approved it should only be altered in exceptional circumstances. It is therefore of key importance there is sufficient land outside the Green belt to meet York's long term planned needs for housing and employment. Without this any approach could be deemed unsound.</p> <p>It would not be possible to demonstrate a 20 year land supply should using the housing target of 780 recommend by Arup.</p>	<p>The proposed Green Belt would serve all the PPG2 purposes of designating land as green belt.</p> <p>By concentrating development purely on brownfield land within York's existing built up area, there would be no additional impact on the areas of green space surrounding the city.</p>	<p>The relative weight to be given to 'Localism' is yet to be tested at a public inquiry into a development plan but it is clearly a key aspect of national policy. This option would clearly fit well with the outcome of citywide consultation given public support for protecting the existing draft Green Belt boundaries.</p> <p>Unlikely to maximise levels of affordable housing as development is restricted to brownfield land/smaller sites which, in the main, tend to carry higher land value/remediation costs and relatively lower % of affordable housing.</p>	<p>There is a risk that an inspector will not allow the inclusion of windfalls when the plan is considered at examination, reducing the potential housing supply. As a fundamental element of the strategic plan, an Inspector would consider such a strategy to be unsound. Although, given that the windfall assumptions discussed under Issue 2 above relate to an allowance for windfalls under 0.2 ha, it could be argued that windfalls in reality would come forward at a higher level.</p> <p>With regard to employment land, site 'I' (previously identified as 'Safeguarded' land in the Local Plan) and the adjacent Northminster Allocation could provide opportunities for additional employment land particularly given the exclusion of site 'C'. The exclusion of these sites would potentially remove choice, particularly if the existing allocation at North of Monks Cross were to be re-designated from employment to housing in order to meet housing</p>	<p>Non applicable as this option designates all land outside the urban edge as green belt.</p>

	In addition, if at the examination it was possible to prove potential lower levels of delivery on identified sites. The plan could be found unsound. It is therefore essential that the level of supply provides sufficient flexibility.			demand.	
Option 2	This approach would allow the creation of a permanent Green Belt (20 to 25 years)	<p>This reflects all the PPG2 purposes of including land within the green belt.</p> <p>The areas identified as offering potential as areas of search for urban extensions reflect the constraints to development set out in paragraph 60. As such, they offer the opportunity for York to meet its development needs in a way that respects the historic City's distinctive setting, avoids flood risk and protects Green Infrastructure.</p>	<p>This approach does not necessarily fit with the citywide consultation response in which around 60% of respondents felt that land should not be identified in the draft green belt for housing or employment. Although any potential urban extension would only be brought forward for development if required, the perception may be that these sites are identified for future development.</p> <p>Comprehensive development on new neighbourhood scale could help address service/amenity deficiencies within existing communities. Piecemeal development would overlook those opportunities.</p>	<p>Would include sufficient flexibility to allow for lower delivery rates on identified sites.</p> <p>This approach also offers the development industry more security in terms of long term supply of identified housing land.</p>	<p>Aside from identified areas of growth on the urban edge, this option designates all land outside existing built up areas as green belt.</p>
Option 3	It would allow the Council to set long	Outside the ring road, land would serve all the PPG2	This approach would keep the land identified as draft Green	This option helps maintain flexibility in meeting long-term housing needs	A countryside policy would apply to areas

	<p>term Green Belt boundaries which would endure for longer than 20 to 25 years.</p>	<p>purposes of including land within the green belt.</p> <p>The areas identified as offering potential as areas of search for urban extensions reflect the constraints to development set out above (paragraph 60). As such, they offer the opportunity for York to meet its development needs in a way that respects the historic City's distinctive setting.</p>	<p>Belt within the Local Plan as open land for the duration of the LDF Core Strategy, therefore in part meeting the aspirations arising from citywide consultation.</p> <p>It would reduce the area covered by Green Belt in comparison to the draft Local Plan.</p> <p>Any review of non-green belt land would be directed by Council and undertaken as part of the formal review of the LDF, through public examination.</p>	<p>as a decision could be made at a future point to re-designate countryside areas. This decision however would require the support of Members in light of prevailing evidence at that time, a review of the plan, consultation and public examination.</p>	<p>of land within the ring road which are not considered to contribute to the historic character and setting of York. These areas would retain importance as strategic green spaces, and be protected from development. The remainder of York's area would be designated as Green Belt.</p>
Option 4	<p>It would allow the Council to set long term permanent Green Belt boundaries almost enduring indefinitely.</p>	<p>This reflects the primary purpose of including land within the Green Belt in York, namely that it would preserve the 'historic character and setting of the City'.</p>	<p>This approach would keep the land identified as draft Green Belt within the Local Plan as open land for the duration of the LDF Core Strategy, therefore in part meeting the aspirations arising from citywide consultation.</p> <p>It would reduce the area covered by Green Belt in comparison to the draft Local Plan.</p>	<p>This option would maintain maximum flexibility. Decisions could be made at a future point to follow alternative spatial strategies through the re-designation of countryside areas. These decisions would require the support of Members in light of prevailing evidence at that time, a review of the plan, consultation and public examination.</p>	<p>As with option 3 above, this approach could however be seen as downgrading land previously designated as green belt. It also significantly reduces the coverage of York's green belt in comparison to the draft local plan.</p>

Options

72. This report sets out a number of options for Members to consider. These are summarised under each of the key issues below:

Issue 1: The Level of Future Housing

- What should the LDF Core Strategy use as a target for future housing?
- Should an allowance for small windfalls be included in the housing supply?

Issue 2: The Level of future employment land provision

- Should the LDF Core Strategy include the target of approximately 1,000 jobs a year?
- Should the LDF allocate Areas C, I and North Selby Mine for employment?

Issue 3: Options for identifying the extent of York's Green Belt

- Option 1: Retaining the existing draft Green Belt in line with citywide consultation responses;
- Option 2: Identify sufficient housing and employment land for at least 20 years including areas of search as required (dependent on the responses to the issues highlighted above). Designating the remaining open land outside the built up areas as Green Belt;
- Option 3: Identify sufficient housing and employment land for 15 years. Undertake to keep all land outside the built up areas open for at least the duration of the plan using Green Belt for those areas outside the outer ring road but designating unconstrained areas within the ring road as 'Open Countryside'; or
- Option 4: Identify sufficient housing and employment land for 15 years. Undertake to keep all land outside the built up areas open for the at least the duration of the plan i.e. 15 years. Recognising the Historic Character & Setting of York as its key objective of York Green Belt, designate those areas identified as performing that role as Green Belt and the remainder as countryside.

Next Steps

73. Members' views on the issues set out in this report will be used as a basis for finalising the LDF Core Strategy pre-submission document. This will involve discussions with key consultees, such as the Highways Agency and English Heritage. It may also be possible to approach the Planning Inspectorate for an informal view on the plan. Officers will then prepare a final report for the Working

Group to consider. This will include the full Core Strategy pre-submission document as well as the Sustainability Appraisal and other supporting documents.

Corporate Priorities

74. The Core Strategy has the potential to contribute towards the delivery of all the Corporate Priorities through its policies and actions. It will aim to make York a:
- Sustainable City
 - Thriving City
 - Safer City
 - Learning City
 - Inclusive City
 - City of Culture
 - Healthy City

Implications

75. The following implications have been assessed:
- **Financial** – None
 - **Human Resources (HR)** - None
 - **Equalities** - None
 - **Legal** - None
 - **Crime and Disorder** - None
 - **Information Technology (IT)** - None
 - **Property** - None
 - **Other** - None

Risk Management

76. In compliance with the Council's Risk Management Strategy, there are no risks associated with the recommendations of this report.

Recommendations

77. That Members:
- i) Provide their views on the options set out in this paper, to inform the preparation of the Core Strategy pre-Submission document.

Reason: To help progress the LDF Core Strategy to its next stage of development.

Contact Details

Author:

Martin Grainger
Principal Development Officer
City Development Team
Tel: 551317

Chief Officer Responsible for the report:

Richard Wood
Assistant Director of City Strategy
Tel: 551448

Report
Approved



Date 24/09/10

Wards Affected: *List wards or tick box to indicate all*

All

For further information please contact the author of the report

Annexes

These are available to view in the Members' Library, on the Council's website and from the author of the report.

Annex 1: Consultation Responses to Vision and Spatial Strategy

Annex 2: Arup Population Paper

Annex 3: Strategic Housing Land Availability Site Suitability Proformas

Annex 4: Arup Employment Paper

Annex 5: Employment Sites

Annex 6: Harrogate Borough Council Countryside Policy