



**EXAMINATION OF THE CITY OF YORK LOCAL PLAN
2017-2033**

PHASE 1 HEARINGS

MATTER 3: Green Belt

**APPROACH TO DEFINING THE GREEN BELT
BOUNDARIES**

CITY OF YORK COUNCIL STATEMENT

The approach to defining the Green Belt boundaries

3.2 Paragraph 1.1.1 of the Council's "Approach to defining York's Green Belt" Topic Paper (TP1) says "York's Local Plan will formally define the boundary of the York Green Belt for the first time." How has the Council approached the task of delineating the Green Belt boundaries shown on the Policies Map?

In particular:

a) Is the approach taken in general conformity with those parts of the Regional Spatial Strategy for Yorkshire and Humber ('the RSS') that have not been revoked, namely Section C of Policy YH9, Sections C1 and C2 of Policy Y1, and the Key Diagram of the RSS insofar as it illustrates the RSS York Green Belt policies and the general extent of the Green Belt around the City of York?

3.2.1 The Local Plan approach taken to the York Green Belt is in conformity with The Regional Strategy for Yorkshire and Humber (partial Revocation) Order (2013) [CD021].

3.2.2 Local Plan Policy SS2 [CD001] establishes the primary purpose of the York Green Belt as being to safeguard the setting and the special character of York and deliver the local plan spatial strategy. This is in conformity with RSS policy YH9(C).

3.2.3 The detailed boundaries for the York Green Belt have been established through the Local Plan based on the methodology set out in the Approach to the Green belt [TP1] and its addendum [EX/CYC/18]. The methodology seeks to safeguard the special character and setting of the city by ensuring that the areas which need to be kept permanently open to protect this (as set out in the spatial strategy) are protected and that local considerations of historic character and setting are considered in setting the boundaries. In order to best protect the historic setting additional land has been identified for removal from the general extent which would cause the least harm and the mitigation and impact of this potential harm have been tested through the Sustainability Appraisal [CD008].

3.2.4 In meeting the requirements of RSS policy Y1 (C1), the detailed inner and outstanding sections of the outer boundary for the York Green Belt have been defined in accordance with a robust methodology as set out above. The outer boundary for York has been established approximately 6 miles

from the centre of York encompassing the setting of the city in the context of its clock face of surrounding villages as far as the limits of the CYC authority boundary will allow. These boundaries are set out in the annexes to The Approach to the Green Belt Addendum (2018) [EX/CYC/18d and EX/CYC/18e].

3.2.5 In terms of defining boundaries and RSS policy Y1 (C2), the nationally significant historical and environmental character of York, including its historic setting, views of the minster and important open areas have been preserved through:

- Identifying and reflecting land that need to be kept permanently open which serves the purpose of protecting the historic character and setting of the city as defined in The Approach to the Green Belt Appraisal (2003) [SD103] and its subsequent updates (2011) [SD108] and (2013) [SD106] and summarised in the presentation of shapers to the spatial strategy [CD001]
- Carrying out local assessments of the detailed boundaries which considers aspects of protecting historical assets as set out in Section 5c of the Approach to the Green Belt Addendum [EX/CYC/18] (Criteria 2a)

b) How has the need to promote sustainable patterns of development been taken into account?

3.2.6 The definition of Green Belt boundaries has taken in to account the need to promote sustainable development and reflected the sustainable development principles of the Local Plan. Local Plan Policy SS1 [CD001] sets out an approach for “delivering sustainable growth for York” and identifies five spatial principles which are in conformity with NPPF (2012) core principles (para 17). The Spatial Strategy explanation also illustrates the ‘Factors Which Shape Growth’ [CD001 (page 27 to 30)] including:

- The Character and Setting of the City
- Green Infrastructure, Nature Conservation, Green Corridors and Open Space
- Flood Risk
- Traffic.

3.2.7 The approach to the Green Belt [TP1 and EX/CYC/18] methodology identifies the areas which can be considered urban so that development can be directed towards this (as explained at 3.1b). It also uses the spatial shapers of the character and setting of the city, green infrastructure, nature

conservation, green corridors, open space, as well as considerations relating to access to services and areas necessary to prevent coalescence and preserve characteristics of compactness and landscape setting. These sustainability considerations have been taken into account within the context of illustrating land which should be kept permanently open for the purposes of green belt policy, including the definition of boundaries. Using the spatial shapers and the setting of the Green Belt boundaries in accordance with these regulates the form and growth of the city and other settlements in a sustainable way, in particular by maintaining a compact urban form.

c) With regard to Paragraph 84 of the Framework, how have 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 been considered?

Urban Areas inside the Green Belt Boundary and towns and villages inset within the Green Belt.

- 3.2.8 In compliance with the spatial strategy the Local Plan has sought to make as much use as possible of land within the City and surrounding settlements and with good access to existing facilities in order to channel as much development as possible to the urban areas within the Green belt.
- 3.2.9 The SHLAA (2018) [SD049] and ELR (2016) [SD063] have channelled development into the urban areas (both the City and surrounding settlements) through the use of accessibility criteria to identify suitable sites only where they are in sustainable locations which have existing access to services in the first instance. Technical Officer Groups used in the site selection process and the SA have then assessed any potential impacts on landscape and setting.
- 3.2.10 To ensure that the number of sites within the urban area was maximised so as to protect the wider general extent of Green belt the plan has:
- Lowered the site threshold from the NPPG guidance of 0.25ha to 0.2ha to proactively identify as many small urban sites as possible (Set out in the SHLAA (2018) [SD049])
 - Included a windfall allowance based on historic trends over the past 10 years to account for urban sites smaller than 0.2ha. This analysis is set out in Annex 4: City of York Local Plan Windfall Allowance Technical Paper (2017) [SD055]. By their nature these sites tend to mainly be within the urban area.

- Policy H2 [CD001] sets out density expectations for the city centre, urban, suburban and villages areas which are higher than previous Local Plans or the assessed existing densities identified through earlier work (City of York viability Study (2014) [SD125]). These density requirements reflect different density zones and distances from high frequency public transport corridors. The density requirements are based on site archetypes which have been maximised and tested through viability studies to give the assumptions set out in the SHLAA (2014) [SD 049] Page 22 and policy H2. For Strategic Sites (over 5Ha) a predominantly bespoke approach is taken to reflect the sites characteristics and detailed master planning work.

- 3.2.11 The Approach to the Green Belt [TP1] and Addendum [EX/CYC/18] also explains how areas of rural land and countryside to keep permanently open have been identified and thereby further channel development towards the urban areas, reinforcing the policy approaches listed above.
- 3.2.12 The Approach to the Green Belt [TP1] and Addendum [EX/CYC/18] also uses access to services to identify locations close to the urban areas which may be more suitable for boundary assessment while the reverse of this indicates areas of land without access to services (and thereby set away from the urban area) as land to be kept permanently open to prevent sprawl.
- 3.2.13 The overall approach to the Local Plan and York Green Belt aligns to the characteristics which make York unique, as set out in the Heritage Topic Paper Update (2014) [SD103], and serve to maintain the compact urban form as a key principle of the Historic City. Thereby focusing development towards the urban area where possible but also opening up the option of identifying new villages within the Green Belt as a focus for urban development which will cause less harm to the overall purpose.

Locations beyond the outer Green Belt boundary.

- 3.2.14 TP1 explains that some of the outer Green Belt boundaries (and thereby land beyond) lie within neighbouring authority areas.
- 3.2.15 Since commencement of the Local Plan process the Council has engaged with neighbouring authorities on a range of cross boundary issues including housing. The outcome of the discussions is that each authority has sought to meet its own housing need. Adjoining authorities have supported City of York in meeting its OAHN within its own boundary and also York fulfilling its role as a sub-regional City with economic growth focussed in the City Centre and other sustainable locations.

3.2.16 The TP1 Addendum (EX/CYC/18) at section 7 Exceptional Circumstances sets out in paras 7.85 to 7.94 the discussions with other authorities about whether they could accommodate some of the identified need. This includes the York, North Yorkshire Spatial Planning and Transport board meeting in September 2015 at which a paper was discussed relating to the distribution of the provision of housing in the York HMA. The paper raised concerns about the ability of York to fully meet its OAHN and impact on the green belt and asked for exploration of alternatives including meeting some of the need outside the York boundary. The outcome was that there was no agreement to take any of York's OAHN at current Plan timeframes and that York should meet its own need within its own boundary. Exporting housing delivery to beyond the authority limits could in any event risk an exacerbation of in-commuting from adjoining areas leading to unsustainable travel patterns.

d) How do the defined Green Belt boundaries ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development and/or include any land which it is unnecessary to keep permanently open?

3.2.17 The Green Belt boundaries and the Local Plan spatial strategy both reflect the key principles and priorities for sustainable development in York and both use the evidence base to achieve this. A number of evidence base documents [SD106, SD107, SD108, SD080, SD081, SD085, SD088, SD089, SD091] identify features which are important to shaping growth in the City of York authority area. These have been referred to in Matter 2 responses. These shapers inform the Local Plan Spatial Strategy [CD001] by identifying land which should not have development directed towards it. These same spatial shapers inform the process of site selection [SD049] by acting as constraints to development and are carried through to the approach to the Green Belt [TP1 and EX/CYC/18] as areas of land which should be kept permanently open. The use of these spatial shapers also directs development toward the existing urban areas by protecting areas of environmental asset to the city. Channelling and maximising development within urban areas is a core part of the Plan's approach to achieving sustainable development.

3.2.18 The Green Belt methodology [EX/CYC/18] approach to checking the unrestricted sprawl of large built up areas uses an approach of mapping access to services which is aligned to the SHLAA methodology and policy SS1's principle of ensuring accessibility to sustainable modes of transport and a range of services.

3.2.19 The identified Green Belt boundaries define and draw a clear distinction between land which is built up/urban in nature (unnecessary to keep

permanently open) and land that should be kept permanently open. The criteria for boundary delineation include what were described in the methodology section of the TP1 Addendum (Section 5) as “openness criteria”, including a strategic level assessment of whether a boundary marked the edge of land identified as required to be kept permanently open, as well as a local assessment of whether the boundary marked the edge of land locally identified to be kept permanently open (see pages 31-3). This methodology was followed through into the detailed boundary assessments in Annexes 2 and 3.

3.3 Will the proposed Green Belt boundaries need to be altered at the end of the Plan period? To this end, are the boundaries clearly defined, using physical features that are readily recognisable and likely to be permanent? What approach has the Council taken in this regard?

3.3.1 No, as explained in TP1 Addendum [EX/CYC/18] methodology, the proposed Green Belt boundaries have been formulated with the objective that will not need to be altered at the end of the Plan period. Section 5 explains how the need for permanence was taken into account at a both a strategic level (enduring beyond the plan period) and at a local level (i.e. a clear recognisable boundary which is likely to be permanent) (pages 40-41). These factors were reflected in the delineation of the detailed boundaries. Paragraph 5.63 explains that the Plan proposes a plan period ending in 2032/3 and proposes a Green Belt which, when account is taken of the full capacity of the allocated sites, will endure for a minimum of 20 years to 2037/8, such that it will not need to be altered at the end of the plan period. At a local level, this approach was reinforced using the following criteria:

- ensuring there are recognisable features which can be associated with the boundary
- assessing the scope for permanence, taking into account how long the boundary has already existed and any consented and not yet built planning applications in the area
- taking into account whether there are multiple layered boundaries/features to offer greater strength

3.3.2 The methodology also identifies that where possible the boundaries should follow the most continuous and 'regular' or 'consistent' line, as irregular or softer boundaries can be more vulnerable to misinterpretation and erosion. In this way the plan identifies the boundaries which are likely to last by offering the greatest resilience to change or erosion.

3.4 Should the Plan 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?

3.4.1 The Local Plan does not identify areas of safeguarded land and the Council does not consider it necessary to do so. Several large new sites which include urban extensions and new villages have been identified for removal from the Green Belt. These sites have build-out rates which stretch beyond the plan period to deliver an integrated ‘future-proofed’ approach to spatial planning. This enables communities to be built on a scale that allows integrated new facilities and services to be provided as part of delivering a sustainable pattern of development. The need to master plan these sites comprehensively to ensure delivery of these facilities necessitates the scale of development and influences the period of time over which development will occur. This has also meant that these sites will deliver development which meets the needs that are forecast to arise beyond the end of the plan period. It is not necessary therefore to designate Safeguarded Land.

3.4.2 This approach to the positive planning of the area is also based on the following rationale:

- Positive planning – the Plan is an inter-connected development strategy, helping to deliver housing, employment, transport and wider community needs. In particular, the large allocated sites make a positive contribution towards meeting the needs of all households, including gypsies, travellers and showpeople. A development strategy predicated on the provision of safeguarded land is less clear about the quantum/scale of development and the potential impacts on the character and setting of the historic City. Given the acknowledged importance preserving the character and setting of the historic City of York, and the potential for harm from development, ‘planned’ growth allows for more robust appraisal of the potential impacts from development.
- Future-proofing – an NPPF compliant Plan should have sufficient flexibility to adapt to rapid change. The submitted Plan contains a mix of shorter and longer-term sites, allowing delivery to evolve over the Plan period. Strategic sites and new settlements need to be planned well in advance over the longer term.

3.5 Overall, are the Green Belt boundaries in the plan appropriately defined and consistent with national policy in the National Planning Policy Framework, and is the Plan sound in this regard?

- 3.5.1 Yes. The boundaries are appropriately defined for the reasons given above. Further, the methodology for defining Green Belt boundaries, as set out in particular in Section 5 of the TP1 Addendum [EX/CYC/18], develops criteria which are drawn from NPPF paragraphs 84 and 85.
- 3.5.2 These include not including land which it is unnecessary to keep permanently open; ensuring the permanence of Green Belt boundaries that will not need to be altered at the end of the development plan period; and defining boundaries clearly, using physical features that are readily recognisable and likely to be permanent (see pages 31-42 [EX/CYC/18] and NPPF (2012) paragraph 85). This methodology is carried through into the detailed consideration of boundaries in Annexes 2 and 3.
- 3.5.3 Section 4 further explains how a strategic approach to Green Belt has helped the process of boundary setting, by relating the underlying principles of the Local Plan spatial strategy (which are themselves directed at achieving sustainable development), to a broad assessment of where to avoid development on land which should be kept permanently open. The TP1 Addendum therefore confirms that the Local Plan strategy and the need to promote sustainable patterns of development have been taken into account (NPPF paragraphs 84-85).