



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

PHASE 1 HEARINGS

MATTER 3: Green Belt

**The approach to identifying land to be 'released' from
the Green Belt for development**

CITY OF YORK COUNCIL STATEMENT

The approach to identifying land to be ‘released’ from the Green Belt for development

3.7 How has the land proposed to be removed from the Green Belt been selected? Has the process of selecting the land in question been based on a robust assessment methodology that:

a) reflects the fundamental aim of Green Belts, being to prevent urban sprawl by keeping land permanently open;

Response

- 3.7.1 Yes. The site selection methodology set out in the SHLAA (2018) [SD049B] uses the factors which inform policy SS1 to select the most suitable and sustainable sites for development (see Section 2). These factors are directed at the need to keep land permanently open and were also taken into account as part of the assessment of York’s Green Belt in the Green Belt Topic Paper [TP001] and Addendum [EX/CYC/18].
- 3.7.2 As explained in paragraphs 7.63 to 7.66 of The Approach to Defining the Green Belt Addendum (2019 [EX/CYC/18]), the SHLAA and ELR undertake a 2-stage suitability process; Stage 1 being a sustainable location assessment, which included criteria identified at Table 1 of the Green Belt Topic Paper (2018 [TP1]). The criteria ensure sites to be taken forward avoid the areas to keep permanently open. Sites which passed Stage 1 were taken through to Stage 2; a Technical Officer Group consisting of experts from around the Council to understand more site specific suitability and determine whether the site should progress as a potential development site. The site selection methodology in the SHLAA therefore incorporates criteria that aims to prevent urban sprawl and keep land permanently open.
- 3.7.3 Appendix K to the SA (2018) [CD009C] sets out an audit trail of decision making for all of the sites which passed criteria 1 to 4 in the site selection process. These include the sites which were selected for release from the Green Belt.
- 3.7.4 Annex 5 to the TP1 Addendum also documents how the need to check unrestricted sprawl has been applied to the sites to be removed from the Green Belt specifically.
- 3.7.5 It is acknowledged that by releasing land from the Green belt, there is by definition an element of harm to openness. However, the approach taken

has ensured the least harm is caused to the Green Belt given that the methodology undertaken direct development to areas which are less sensitive to the historic character and setting of York.

b) reflects the essential characteristics of Green Belts, being their openness and permanence;

Response

3.7.6 The alignment between the site selection methodology (SHLAA) (2018) [SD049] and consideration of Green belt purposes as set out above is intended to reflect the essential characteristics of Green belt. The methodology has ensured that development is directed away from areas considered important to be kept permanently open and is directed to less sensitive areas to minimise harm to the special character and setting of the city and to the most sustainable locations.

3.7.7 Table 1 in the Green Belt Topic Paper [TP001] (page 24) illustrates how each of the site selection principles, which stem from the Policy SS1, have taken into account consideration of the green belt purposes. Section 8 of the TP1 Addendum confirms that when assessing the boundary of each site proposed for release, the openness and permanence based methodology for boundary delineation described above was applied to ensure the establishment of a defensible boundary and delivered a permanent Green Belt. The detailed assessment of the sites is in Annex 5 to TP1 Addendum [EX/CYC/18b]

c) takes account of both the spatial and visual aspects of the openness of the Green Belt, in the light of the judgements in *Turner1* and *Samuel Smith Old Brewery2*;

Response

3.7.8 The strategic and local openness criteria (pages 31-33 of TP1 Addendum [EX/CYC/18]) take in to account both the likely visual and spatial impact of development on the openness of the Green Belt. Strategic Criteria identified under purposes 4 and 2 reflect visual impacts (including area preventing coalescence, areas protecting village setting and areas protecting the rural setting of York) and the local assessment criteria include “Views - City Wide panoramas, views of important monuments” and Historic Landscape Character. Visual relationships are also a key component of the Heritage Impact Assessment [SD101-2] approach, which has informed the assessment of land releases.

d) reflects the five purposes that the Green Belt serves, as set out in Paragraph 80 of the Framework, particularly that of preserving the setting and special character of the historic city (in answering this question, we ask that the Council refers specifically to the ‘wedges’ of Green Belt that would be created, for example those between the main urban area and Sites ST7 and ST8);

Response

- 3.7.9 Yes; potential sites/releases of land in the Green Belt have all been assessed against the five purposes of Green Belt set out in paragraph 80 of the Framework. This is set out in Annex 5 of the TP1 Addendum Table 1 of Topic Paper 1 [TP001] .
- 3.7.10 The methodology applied has followed the approach to defining the land that should be kept permanently open, this has been explained above and reflected in the development of the spatial strategy whilst also being informing the constraints to development used to select sites in the SHLAA [SD049] and ELR [SD063]. The TP1 Addendum (Section 4 [EX/CYC/18]), refers to these areas to keep permanently open and explains specifically in 4.10 to 4.21 how this relates to the historic character and setting of the city.
- 3.7.11 The approach in section 4 of the TP1 Addendum [EX/CYC/18] is underpinned by the Approach to the Green Belt Appraisal (2003 [SD107A-C]) and subsequent Updates [SD106 and SD108]). These identify characteristic which are important to York such as views from open approaches and the perception of the city and the minster within its rural hinterland. The documents translate characteristics into tangible areas of land, representing areas of primary importance to the setting and special character of the city. These areas need to be kept permanently open within the general extent of the Green Belt. The appraisal identified land under the following categories (see Figure 3 of TP1 Addendum [EX/CYC/18]:
- village setting;
 - strays;
 - river corridors;
 - areas retaining rural setting;
 - areas preventing coalescence;
 - green wedges; and
 - extension of green wedges.
- 3.7.12 Paragraph 4.17 also notes “*The Green Belt Appraisal does not identify everything that is special about York. Areas not identified on the appraisal*

map may still be important to the historic character and setting but the map [Figure 3, page 13] only identified the most important areas”.

- 3.7.13 Furthermore, in identifying the site allocations, including those to be removed from the Green Belt, further discussions also took place with Historic England and further evidence has included a Heritage Topic Paper Update [SD103]. This Topic Paper identified additional characteristics of what makes York special and need to be preserved or enhanced. These characteristics form the basis of the Heritage Impact Appraisals (2017) [SD101-2]. These site based appraisals consider the impact of proposed development sites may have on the historic character and setting of York.
- 3.7.14 This site specific process has identified potential harm to the historic character and setting of York, even when sites are situated outside of the areas of primary importance identified through the process set out above. This has led to a refinement of proposed site boundaries in order to minimise harm and ensure that elements which are important to Yorks historic character and setting can be replicated and reinforced.
- 3.7.15 These changes to sites 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.
- 3.7.16 Strategic allocations ST7 ‘Land the west of Metcalfe Lane’ and ST8 ‘ Land to the north of Monks Cross’ are two allocations wherein the boundaries have evolved to incorporate and respond to the key principles in the Heritage Topic Paper(2014 [SD103]). ST7 is identified as a standalone settlement which has been pulled away from the existing urban edge of Heworth Without, Meadlands and Osbaldwick to create a separate settlement or ‘garden village’ that sits separately to York and within its own landscape context
- 3.7.17 ST8 is an urban extension separated from Huntington to the west. The retention of a green wedge as part of the allocation boundary helps to protect the setting of Huntington village and create a new green wedge. The creation of a new green edge helps to reinforce the principles identified as a special characteristic across the city and unique to York as per the Heritage Topic Paper.
- 3.7.18 Further detail in relation to assessments on land to be removed from the Green Belt are set out in Annex 5 to the Approach to the defining York’s Green Belt (2019[EX/CYC/18b])

e) is in general conformity with RSS Policy Y1, which aims to protect the nationally significant historical and environmental character of York, including its historic setting, the need to safeguard the special character and setting of the historic city and to protect views of the Minster and important open areas;

Response

3.7.19 As set out in response to question 3.7d above, the methodology applied in assessing sites to remove from the Green Belt has included as a key consideration the significant historical and environmental character of York, including its historic setting. This has involved the strategic consideration of maintaining areas of land to keep permanently open (see The Approach to Defining the Green Belt [TP001] and the Addendum [EX/CYC/18], which explain the use of Green Belt Appraisal (2003) [SD107A-C] and subsequent papers SD106 and SD108)). On a site specific basis further work included a Heritage Topic Paper Update [SD103] which was used to inform Heritage Impact Appraisals (2017) [SD101-2]. These were employed to consider the impact of proposed sites for development.

3.7.20 The Heritage Topic Paper Update sets out six Principal Characteristics which afford York its unique character:

1. Strong Urban Form
2. Compactness
3. Landmark Monuments
4. Architectural Character
5. Archaeological Complexity
6. Landscape and Setting

3.7.21 These six principle characteristics form the basis for site specific Heritage Impact Appraisals. These use the full characteristics framework as set out in the Heritage Topic Paper which expands on the characteristics set out above in Figure 2 [SD101]. In particular, views of the minster are addressed in characteristic 6 (as set out in Figure 2):

6. Landscape and Setting		
6.1	Views in and out	(a) Long-distance views of York Minster in low-lying relatively flat vale landscape. The Minster constantly reappears at closer quarters. (b) View of the race course/Knavesmire and Terrys combined.

		<p>(c) Rural edge setting viewed from majority of ring road by way of field margin (northern ring road business parks exception to rule).</p> <p>(d) Views out to the Wolds, Moors and the Howardian Hills (orientation, identity, and sense of location/setting).</p>
6.2	Strays (including racecourse) and common land	Openness; greenness; natural/rural character within city. Village greens.
6.3	Rivers and Ings	<p>(a) Derwent/Ouse: Flooding; Ings meadows; retention of traditional management over centuries - still hay cropped and grazed where possible.</p> <p>(b) Ouse - walking along most of either bank north to Beningborough hall, south past Bishops palace. Activity on river - rowing (3 clubs) dating back to mid 19th century.</p> <p>(c) Foss – two rivers converging in city centre; walkway from centre to countryside beyond ring road; linking villages – the ‘hidden’ river.</p> <p>(d) Views along river/banks.</p>
6.4	Open countryside and green belt	<p>(a) The open countryside surrounding York contributes to the landscape setting of the historic City;</p> <p>(b) A wide variety of different habitats and landscape elements including: Lowland heath; wet acidic grassland; rich hedgerows; valley fen; open Ings landscape associated with river; wildflower meadows;</p> <p>(c) Airfields with large expanse of openness/cultural heritage/habitat value;</p> <p>(d) Village settings including: assorted land; strip field pattern/ridge and furrow; hedgerows; veteran orchards.</p> <p>(e) Long distance uninterrupted recreation routes with cultural significance through countryside</p> <p>(f) Orchards – vale of York high orchard productivity historically; veteran Pear and apple trees often in gardens of later development.</p>
6.5	Suburban villages	Street trees, public parks, large gardens, ‘quiet streets’, pedestrian-friendly environment, strong community identity, allotments, front gardens bound by hedges

6.6	Parks and Gardens	(a) Registered historic parks and gardens (b) Parks for the people (c) Designed campus landscape (d) Matrix of accessible parks
6.7	Relationship of the historic city of York to the surrounding villages	The relationship of York to its surrounding settlements. This relationship derives from:- (a) the distance between the settlements (b) the size of the villages themselves, (c) the fact that they are free-standing, clearly definable settlements

3.8 Have the Green Belt boundaries - as proposed to be altered - been considered having regard to their intended permanence in the long term? Are they capable of enduring beyond the plan period?

Response

- 3.8.1 Yes. The proposed boundary of each site allocated for removal from the Green Belt has been assessed in terms of openness and permanence using the same methodology as applied to establishing the inner and outer boundaries. This is addressed at Annex 5 of the TP1 Addendum for each site under “detailed boundary issues” to ensure that a defensible boundary contributes to delivering a permanent Green Belt.
- 3.8.2 As set out in paragraphs 5.62 to 5.66 the plan aims to ensuring the strategic permanence of the York Green Belt through the removal of land which will ensure the development needs of the city are addressed for at least 20 years, this is longer than the plan period.

3.9 In this regard, what is the justification for the proposed alterations to the Green Belt boundary, as set out in *Annex 6 of the Topic Paper 1: Addendum* [EX/CYC/18]?

Response

- 3.9.1 The answer below is in relation to Annex 5 [EX/CYC/18b] as it is assumed that this the intention, however a separate answer regarding Annex 6 [EX/CYC18b] is included below.
- 3.9.2 As explained in previous questions, there is an identified shortfall in housing and employment land within existing built up areas to meet the requirements as set out in the Local Plan evidence base. There is no suitable available

and deliverable land outside the existing urban areas that is not within the Green Belt. Exceptional circumstances justifying the release of Green Belt are further explained in the TP1 Addendum at Section 7.

3.9.2 The same exceptional circumstances of the need to release land to meet demand is identified for all of the proposed sites to be removed from the general extent of the Green belt. It is accepted that the release of any land from the Green Belt will cause some harm to the openness of the Green belt but by securing the removal of these site, the long term permanence of the Green Belt will be created. The sites which have been identified to be released from the Green Belt have been selected as:

- They offer the most sustainable pattern of development:
 - Each site is either adjacent to an existing urban area or will create a new urban area within its own facilities and services, thereby channel development away from the wider Green Belt. This aligns with the Local Plan Spatial Strategy.
 - Each site either has access to a range of existing services and facilities or has the size and ability to create their own. This is tested through the SHLAA (2018 [SD048]) and ELR (2016 [SD063]) methodologies and summarised in Annex 5 of the Approach to the Green belt [EX/CYC/18b].
- They offer the best alignment with the Spatial Strategy (Policy SS1 [CD001] and the saved policies of RSS as they have been selected so as to cause the least harm to the historic and environmental character of the historic city of York as:
 - They seek to maintain separate and distinct new settlements which are both visually and spatially separate so as to maintain the identity of communities in keeping with the characteristics of York. This has been tested through HIA assessments [SD101 and SD102] and site specific Sustainability Appraisal [CD008 and CD009] and is summarised under purpose 2 in Annex 5 [EX/CYC/18b]
 - They protect or enhance the historic Character of the city, by avoiding the areas and characteristics that are most sensitive to development and must be kept permanently open while developing historical pattern of growth for York. This has been tested through HIA assessments [SD101 and SD102] and site specific Sustainability Appraisals [CD008 and CD009] as well as Local level openness and permanence criteria applied to boundaries as set out in the methodology of the TP1 Addendum (section 5 [EX/CYC/18]). This is summarised under Purpose 4 of Annex 5 [EX/CYC/18b]

- They protect the most sensitive parts of the countryside from encroachment (identified as areas which relate green infrastructure and nature conservation, see paragraph 4.31 to 4.38 of the TP1 Addendum 92019 [EX/CYC/18]). This is tested through the SHLAA (2018 [SD048]) and ELR (2016 [SD063]) methodologies as well as site specific Sustainability Appraisals [CD008 and CD009] and summarised in Annex 5 [EX/CYC/18b].

3.9.3 In regard to EX/CYC/18a – Annex 6 (if this was the intended subject of this question). This annex presents minor amendments to the detailed inner boundary of the York Green Belt. These changes were identified as a result of checks carried out as part of publishing the TP1(Addendum [EX/CYC/18]. These were consulted on through the Proposed Modifications Consultation (June 2019) [EX/CYC/20] as PM's 29-41. Under each proposed modification reasons were given, which largely ensured consistency with the methodology for boundary definition (eg to avoid boundaries that are more difficult to identify on the ground, or to place the boundary on the outer edge of a metalled surface to identify more clearly the urban area outside the Green Belt. These decisions were made as part of establishing the inner boundary of the York Green Belt and do not require exceptional circumstances.

3.10 Overall, is the approach to identifying land to be 'released' from the Green Belt robust, and is the Plan sound in this regard?

- 3.10.1 The Plan is sound in its approach to identifying land to be released from the Green belt. The approach is positively prepared as it is aligned with the spatial strategy which seeks to meet objectively assessed development and infrastructure requirements whilst achieving sustainable development. The sites selected are those which are considered to offer the most sustainable forms of development as assessed through the SHLAA (2018 [SD049]) and ELR (2017 [SD063]) while conserving and enhancing historical and natural assets. Exceptional circumstances justifying the release of sites are detailed in Section 7 and Annex 5 of the TP1 Addendum [EX/CYC/18b].
- 3.10.2 The approach is justified as it is based on proportionate evidence which demonstrates that the package of sites selected have been considered in the context of the principles of the spatial strategy and are considered to be those which will cause the least harm to the Green Belt purposes.
- 3.10.3 The approach is effective as it is deliverable over the plan period and beyond, involving willing land owners and developers and meeting development needs in a sustainable pattern of development.

- 3.10.4 The approach is consistent with national policy as while it is accepted that the removal of sites will have an impact on the openness of Green belt, the approach offers the most effective delivery of sustainable development while setting an enduring Green Belt for York with clear and defensible boundaries which will protect the historic importance of the area in accordance with the NPPF.