



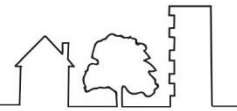
AIREDON
PLANNING & DESIGN

York Local Plan Examination

Phase 2: Matter 4 Statement

Mr J Harrison

March 2022



Matter 4 – Spatial Strategy and the Site Selection Process

1. Summary of representations:

- **The Council has failed to apply its own methodology in assessing housing sites for potential site allocation through the site selection process. This failure of the Council to undertake a proper, objective assessment of the sustainability of sites coming forward for potential allocation fails to meet the requirements of national planning policy and renders the plan unsound. Furthermore, the Council has failed to provide justification for its methodology relating to the upper site size threshold (35ha) leading to a flawed evidence base and unsound Sustainability Appraisal.**
- **The Plan is fundamentally flawed for the above reason. The only reasonable action that should be taken is a complete restructure of the Plan and to start again in the Plan making process.**

Site selection process

(Question 4.11) With regards to the sites proposed for all types of development (i.e. housing and non-housing):

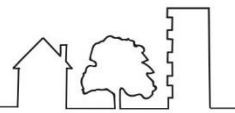
a) How have the sites been identified, assessed, and selected?

b) Is the methodology used for each justified?

c) What role has the Sustainability Appraisal had in this process?

d) Have any site size thresholds been applied in the site selection process? If so, what, how and why?

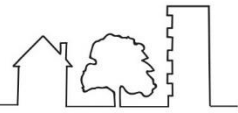
2. Comprehensive representations were submitted in respect of the site selection process throughout the Local Plan making process, including within the Phase 1 Hearing Statements and during the Proposed Modifications and Evidence Base consultation in July 2021.
3. The previous observations and objections remain relevant and we have nothing more to add on the matter.



(Question 4.12) How has the Council taken into account Green Belt issues in the site selection process? In particular:

a) has the openness of the sites been considered, and the degree to which that openness contributes to the fundamental aim of Green Belt policy (preventing urban sprawl by keeping land permanently open), been taken into account?

4. The quality of the land and its contribution to Green Belt purposes was not considered in the slightest at the Proposed Options stage where the initial allocations were made. A number of sites were subsequently amended – and further amendments were made at a later stage when boundaries were drawn in a way that more closely resembled the guidance provided in the NPPF. It is completely clear that this was the case as ST14 was initially planned as a sustainable urban extension, and it was only later decided that some land along the ring road would need to be kept open for Green Belt purposes. Similarly, a gap was drawn between ST14 and the village of Skelton to the west and this was also not in the original proposals. However, it is clear that, even at the stage when it was decided that it was important to retain some open space along the ring road, no actual consideration of the depth of the gap was given. If it had been, a gap similar to that already identified for Skelton and Wiggington would have been identified at this stage as it is incomprehensible that a modern development would require a reduced distance (particularly when there is no existing hedge line to screen the new development) compared to existing, lower-level development on the southern edges of Wiggington and Skelton.
5. Furthermore, the fact that you can clearly see the Minster from the bridleway to the north of ST14, thereby indicating that this site lies within the green land that is currently part of the valued views from York Minster has been given little consideration in any assessment of the site.
6. By initially allocating this site as a sustainable urban extension, without first considering if any or all of the site has value within the York Green Belt, then reducing the scale to create a stand-alone settlement which contradicts the original the Strategic Options set by the LPA, the Council have demonstrated that no weight was given in the early stages of plan making to the Green Belt in relation to new development. The Green Belt work carried out early in the process only considered the relationship of existing settlements to the Green Belt, and not how new development might impact upon the Green Belt. This is a fundamentally flawed approach to identifying where development should be located within the area, and contradicts the Council's own methodologies and approaches set out in their Proposed Options.



b) has the degree to which land does or does not serve the purposes of including land in the Green Belt been an influencing factor?

7. It is notable that sites have been modified subsequent to their initial identification, because of Green Belt concerns raised in consultation responses, or because the Council acknowledged that some boundaries did not meet the required coherence to meet NPPF guidelines. However, some of these modifications – such as that to ST14 were so significant that it is clear that no assessment of the degree to which the land served a purpose in the Green Belt had been carried out before the site was initially allocated. Because that assessment was not carried out initially, the site was allocated. Subsequent modifications still did not properly consider the Green Belt function of the land, and the fact that the site no longer conformed with initial strategy seems to have been ignored. Thus, while there has been a degree of influence of the Green Belt in the shaping of ST14, it was only allocated in the first place because the Green Belt worth of this site was completely ignored.