

## City of York Council Local Plan Examination

Matter 7 Hearing Statements

March 2022



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## MATTER 7: APPROACH TO SETTING GREEN BELT BOUNDARIES

Q7.1 This Local Plan will formally define the boundaries of the York Green Belt for the first time. The Council's approach to defining the Green Belt boundaries now proposed is set out in 'Topic Paper TP1 – Approach to Defining York's Green Belt: Addendum' (January 2021) [EX/CYC/59]. In the light for the evidence, in setting the proposed Green Belt boundaries:

- a) how, in simple summary, have the proposed boundaries been arrived at?
- 1.1.1 In general, Gladman support the summary set out by the Council in EX/CYC/59.
- **1.1.2** The Council's evidence relating to the Green Belt is provided in the following documents:
  - Approach to the Green Belt Appraisal (SD107A);
  - City of York Historic Character and Setting Technical Paper 2011 (SD108);
  - City of York Historic Character and Setting Technical Paper 2013 (SD106);
  - City of York Heritage Topic Paper Update 2014 (SD103);
  - City of York Council Topic Paper Approach to Defining York's Green Belt 2018 (TP1);
  - City of York Council Topic Paper Approach to Defining York's Green Belt Addendum 2019 (EXCYC18).
  - Topic Paper TP1 Approach to Defining York's Green Belt: Addendum' January 2021 (EX/CYC/59)
- **1.1.3** Gladman reserve the right to comment following any additional information provided by the Council.

b) what influence have heritage assets and other environmental designations, such as conservation areas and SSSIs had on the setting of Green Belt boundaries?

- 1.1.4 The assessment has placed significant reliance on elements such as listed buildings and conservation appraisals alongside utilising the York Landscape Character Appraisal which was published in 1996 and is considered to be outdated.
- 1.1.5 Gladman refer to our representations made in response to the Proposed Modifications and New Evidence to the Local Plan consultation (July 2021), primarily EX/CYC/59 and supporting annexes.

## Q7.1 c) to f)

**1.1.6** These questions are for the Council to answer, Gladman reserve the right to comment following any additional information provided by the Council.

Q7.2 As a matter of principle, do the proposed Green Belt boundaries include any land which it is unnecessary to keep permanently open?

- 1.1.7 Gladman consider that the Green Belt boundary assessment methodology places significant reliance on elements that are not necessarily related to the purposes of Green Belt, such as conservation appraisals, listed buildings and other non-landmark heritage assets.
- **1.1.8** It is considered that further clarification and amendments may be required to the assessments to ensure that the conclusions are fully justified.

Q7.3 Overall, is the approach to setting Green Belt boundaries clear, justified and effective and is it consistent with national policy?

- 1.1.9 Gladman consider that the document EX/CYC/59 has provided methodological clarification including detailed information regarding local aspects of the Green Belt assessment. However, it is considered that there remain concerns relating to the robustness and comprehensiveness of the assessments undertaken which rely on evidence not necessarily related to the Green Belt functions and does not contain assessments against all five purposes of the Green Belt.
- 1.1.10 Notwithstanding the concerns relating to the comprehensiveness of the evidence base and assessments, Gladman believe that appropriate conclusions have been drawn and support the proposed boundaries which promote the long-term permanence of and maintain the openness of the Green Belt, while the site allocations do not fulfil strong functions.
- 1.1.11 In regard to this, Gladman highlight the allocation of Site ST<sub>31</sub>, which highlights the appropriate conclusions which the Council have drawn. The development of the site does not lead or encourage urban sprawl due to its containment within existing permanent and prominent infrastructure. These boundaries include the A64 and Tadcaster Road, and prominent residential development along the south-east boundary which are already within the wider extent of the Copmanthorpe settlement boundaries, as discussed within EX/CYC/59 Annex 4. Furthermore, the adjacent land uses to the site, notably road and rail traffic, mean that the site does not display the distinct open and rural feel displayed by

wider open countryside. EX-CYC-59a Annex 1 that Copmanthorpe and ST<sub>31</sub> specifically is not identified as having key or long-distance views that capture and express the essence or wider setting of the city. In this regard, the site does not serve purpose 4.

- 1.1.12 Additional commentary has been provided in response to our previous Hearing Statements (2019) and response to the Proposed Modifications and New Evidence to the Local Plan consultation in July 2021.
- **1.1.13** It is considered that the proposed detailed boundaries of the Green Belt have the ability to align with the requirements set out in the Framework but require further clarification.