

## YORK LOCAL PLAN

### Supplementary Evidence relating to:

#### MIQs 8 – Non-Strategic Housing Allocations – Site Specific Issues and Green belt boundaries

#### From:

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Date: 2 July 2022

#### Background & Context:

This evidence is supplementary to responses made by me in the 2021 Consultation and also in earlier Consultation exercises (2019, 2017, 2014, 2012 and others previously). It reflects further detailed perusal of, and commentary upon, latest published documents; and attempts to thread together various points. It does not replace previous submissions.

This represents my own views, as a local resident. Submitted as requested before 5 July 2022, prior to the Phase 3 Hearings. Among particular documents informing this (but which may not all have been available, or we were unaware of, at the time of making previous Consultation responses), are:

[Ref 1]:

EX\_CYC\_59f\_Topic\_Paper\_1\_Green\_Belt\_Addendum\_January\_2021\_Annex\_4\_Other\_Developed\_Areas  
and

[Ref 2]:

Local\_Plan\_Publication\_draft\_\_\_Sustainability\_Appraisal\_Appendices\_H\_I.pdf

#### Topic: Elvington village and Site H39

These are site-specific objections in relation to **H39** (also described elsewhere as site 95), and the concomitant proposed Green Belt boundary change. Specifically, the proposal to remove it from the Green Belt is wrongly conceived, and H39 should remain in the Green Belt.

Also discussed, is that **site 55** *should* be considered for development in Elvington, and is certainly a preferred site rather than H39.

#### Representation Status

Strong arguments against removal of H39 from the Green Belt have been made extensively and consistently in consultation responses over very many years, by an overwhelmingly large number of local residents (as well as Elvington Parish Council). “Consultation fatigue” has set in long ago, but Objections at one earlier phase of the process exceeded over 140, with only one or two landowners supporting.

I am not here summarising all the many points made, but they include (in summary, and *inter alia*):-

- Site serves Green Belt function. Thereby contributing to character & setting of York.
- Undue detriment to the character of the rural village.
- Undue detriment to the character of adjoining rural lane & nearby Conservation Area.
- Detriment in form of large estate, as an extension of existing Becksides estate; contrary to established shape of existing modest-sized developments in the village.

- Adverse traffic impact upon existing Beckside estate (through which access would have to be).
- Lack of western boundary to site.

These may be viewed predominantly as representations wishing to ensure that the village's main and traditional walking route out into the countryside remains unspoilt and rural (Church Lane & beyond); and from those in Beckside wishing to see their estate remain modestly proportioned and not swamped by traffic.

At the same time, these have been supported by clear representation that Elvington is not averse to appropriate and proportionate development in the village, but H39 is not the right location. Rather, site 55 (roughly behind the school and off Dauby Lane, and previously known elsewhere as site H26) is widely seen as a far preferable site for development, and numerous consultation responses have supported this. Reasons for Site 55 may be briefly summarised:-

- Larger site, with more capacity & capability.
- Essentially hidden from view (behind substantive tree belts), with no adverse visual impact.
- Negligible impact upon character and appearance of village and its setting.
- Well situated as regards traffic flows and access.
- Can walk to school, doctor's surgery etc.
- (Site seems partially brownfield anyway, with some old ruined buildings).

One might note that way back prior to 1987 that site was already identified by the then Selby DC as the main reserve site for future development in Elvington.

#### CYC counter-arguments

Despite the extensive and detailed representations, CYC persists with **site H39**. And it has now removed site 55 from the latest published list of sites.

The arguments put forward by CYC in relation to both these sites, and in response to consultation feedback, are very weak, and fail to address, or give any weight to, the specific points put forward in the many consultation responses. CYC's responses appear to be based largely on some remote interpretation using maps, and seem like arbitrary academic constructs bearing little or no relation to the local geography or the village layout & function, while also ignoring other local arguments. Chief among these is the impact upon the rural character proceeding along Church Lane.

The assertion that the proposed western boundary to H39 would be logical, as it would sit in line with the adjacent Beckside estate boundary, seems specious in practice. These boundaries have little effective visual relation. The position of the Beckside western boundary as such is not readily discernible from the southern side, behind the existing tree boundary to the North, and the argument does not reflect the reality as viewed from site H39 itself or from the neighbouring Church Lane and countryside. What might look like convenience on a map does not translate effectively on the ground; and the overall visual impact upon the surroundings and character of the village is far more important than tidying of a line on a map.

A problem is there is no meaningful western boundary to the proposed H39, and sprawl into subsuming the entire field up to Red House Farm would be hard to resist, and would of course represent a gross over-development totally altering the character. This was proposed as site 976 on Page A4:94 of [Ref 1], but then rejected. Either way, H39 clearly contravenes from para 4.2/4.3

on page A4:86: *“The further loss of attractive, sequential views as a result of infill and expansion would impact on the village’s character and setting. It is important that a strong boundary is created to the western edge of the village to prevent sprawl”* .

The assertions about Boundary 4 around page A4:97ff seem disingenuous, before proposing its southern portion of Boundary 4 as outwith site H39.

An issue to ponder is that perceptions of encroachment, or sprawl into the countryside, are in practice slightly subjective. Here representations have been mostly in respect of villagers looking at their surroundings as they walk out of (or into) the village; Church Lane is the principal such walking route, and widely used by ramblers and dog walkers alike.

Similarly, CYC’s argument that **site 55** would represent undesirable joining up of the village betrays a lack of knowledge or understanding of the village as a whole, and shows little evidence that the planners have actually visited Elvington. Although the main historic centre of the village is indeed to the East, around the village green, Elvington is much more than that and does encompass development past the school, through to the west of site 55, including the Doctor’s surgery and Elvington Park estate, not to mention the Conifers estate and ultimately Elvington Air Museum; all these consider themselves very much part of Elvington, and we like to think we are an integrated community. And indeed there is Elvington Airfield a little further on, which likes to consider itself as Elvington. The short stretch along the B1228, between the doctor’s surgery and the school, does not need to enhance some artificial internal separation, but arguably would benefit from some cohesion.

(CYC’s assertion here is also particularly ironic, as elsewhere the massive site ST15 is being proposed virtually abutting the village, yet with scant regard to separation).

More to the point, appropriate development on site 55 would be *invisible* from the main B1228 road (and potentially also from Dauby Lane), situated completely behind an existing substantial and mature belt of trees (themselves behind a wide verge and substantial ditch).

While the views expressed regarding compactness (Criterion 1) on page A4:82 of [Ref 1] are acknowledged, it is hard to see on the ground how Site 55 could impact this criterion.

Also the concern expressed on Page A4:83 of [Ref1] is not applicable in relation to this site *“There is a risk that, in allowing further expansion west along Elvington Lane (Boundary 1), the village will coalesce with its outlying Business Parks, significantly altering the experience of entering the village through rural landscape and impacting on compactness”*. There need be no visible impact and no alteration of experience. The industrial / business areas are themselves set back well from the B1228, and are well contained; these concerns for this site have little validity and in no way reflect the geography.

## **Analysis in Appendix H**

Analysis of the above points is not always easy to track among the swathes of documentation. But Page H2 of Appendix H\* shows a summary table of SAOs including both Site 55 and Site H39, including as follows:-

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\* (Local\_Plan\_Publication\_Draft\_\_\_Sustainability\_Appraisal\_Appendices\_H\_I)

Call for Sites Ref	Local Plan Ref	SITE NAME	Status at Publication Draft	SAO1	SAO2	SAO3	SAO4	SAO5 / SAO6	SAO7	SAO8	SAO9	SAO10	SAO12	SAO13	SAO14	SAO15
55	n/a	Land at Dauby Lane, Elvington, York	General Reasonable Alternative	++	++	+	0	I	+	-	--	0	0	0	0	0
95	H39	Street, Knayton North of Church lane Elvington	General Housing Allocation	+	+	+	0	+	+	-	--	0	0	0	0	0

As these are presented here, they already show a clear positive advantage for Site 55 compared to H39 both in terms of overall ranking and in three major categories, as below. (I add my own very brief explanation / commentary to these categories):-

**SA01** (Housing needs). Site 55 is significantly larger. And would also have capacity for diverse and low-cost housing.

**SA02** (Health & well-being). From Site 55 residents can readily walk to the doctor’s surgery, the very-nearby sportsground, and the school.

**SA08** (Natural environment). H39 has more detrimental impact (including hedgerows of SINC interest).

However, the analysis and scorings here seem limited, and I would suggest that Site 55 should also show advantage in terms of:-

**SA05** (Equality & Access): Site 55 has better potential for diverse housing. Both affordable housing, and also some 5-bedroom housing which is a need the village has long identified. (The issue is that Elvington has very few of these, and growing local families can find themselves forced to move away in order to secure adequate-sized accommodation). H39 by contrast, is smaller and more limited and would be likely a clone of the more uniform Becksides estate to which it would become an extension. This has already been acknowledged, with the only vehicular access through Becksides, as Church Lane cannot absorb any further development /traffic.

and

**SA06** (Need to travel). Site 55 is particularly situated for walking to Elvington school (to which it is adjacent) without using the public highway or crossing any roads. It is also centrally situated, and in comfortable walking distance for all other village amenities or facilities.

Further, I suggest there should be amendment to the rankings in respect of:

**SA09** (Land resources) . Site 55 includes a number of derelict buildings from WWII, which while not visible from the highway are in themselves an eyesore and could be developed or demolished.

and

**SA014** (York’s character & setting). Site 55, with the existing tree belts retained, will have no discernible visual impact upon the village and its rural character. Such character is part and parcel of the overall City of York. On the other hand, development of Site H39 has been strongly opposed due to adverse effect upon the unique rural character of Church Lane, as it leads out from the village.

In summary regarding H39, I can best reproduce directly the words of the Inspector published in his Report following the 1992/3 Public Inquiry into the York Plan, when these sites were considered, and site H39 was then designated Site D75:-

D75.11 Site D75 is more enclosed, and has a much more close relationship with the village. Its basic character remains however more one of open countryside than of an open part of the village, and it adds to the character of the village by its important contribution to its setting. This in turn makes a contribution to the character of the setting of York. The contribution is inevitably small compared to that made by sites adjoining or close to York itself, but it is nonetheless one part of the principal function of the Green Belt. I consider that site D75 should remain open in order to fulfil Green Belt functions. Even if I were to consider that there was an overriding need to make further provision of land for future development, it would be inappropriate to exclude this site from the Green Belt when there are likely to be difficulties in relation to the provision of an access to the site which would not cause harm to the character of the village or the amenities of its existing residents.

These remarks are as pertinent now as they were then.

**A wider consideration** is this: If the massive ST15 development goes ahead nearby, is it not all the *more* important that Elvington retains its essentially rural nature?

**A couple of recent photos:**



**A.** Site H39 looking towards the west. Church Lane runs along the left-hand side. In the distance is Red House Farm. The proposed boundary would run across the middle of this field.



**B.** View of the main B1128 looking westwards, taken from a point about 100m from the school (which is on the right-hand side). Site 55 would be entirely behind the bank of trees shown on the right. The doctors' surgery is just at the end of this bank of trees, in the distance with its entrance barely visible on the right-hand side.