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Date: 26 August 2022

Dear Mr Berkeley and Mr Griffiths

**City of York Council
Examination of the City of York Local Plan 2017 -2033**

Schedule of Matters, Issues and Questions for the Examination

Phase 4 Hearings

Re: Matter 1: Green Belt Boundaries

1.2 Are the inner Green Belt boundaries (Topic Paper 1 Addendum Annex 3 – Sections 5-7) reasonably derived?

The Green Belt Boundary Section 7 Boundary 16 – University Road, Heslington Road and The Retreat has not been reasonably derived.

The proposed modification PM89 proposes that the inner green belt boundary should follow the south carriageway edge Heslington Lane and Thief Lane and the edge of built development at the Retreat.

The reason for this proposed modification is: Consistency with the Green Belt methodology which indicates that where the metalled surfaces of roads are in proximity to urban uses they should be considered to form part of the built-up area.

The description of the boundary contained in PM89 includes the phrase: 'It (the inner Green Belt boundary) extends around the access road surrounding the Retreat'. This description implies that the road is continuous around the main

buildings. This is misleading as this access road does not completely surround the edge of the main buildings of the Retreat.

Historic Environment Record (HER) (SYO2116), describes this road in the following way, 'The drive enters at the east end of the principal building and splits to curve round and terminates in a carriage sweep in front of the main northern elevation of the building, and to lead round the east side of the building and head in a southerly direction down to the small farm complex and burial ground in the south-east corner'. <https://her.york.gov.uk/source/SYO2116>

In fact, after this road has travelled along the east side of the main buildings, as well as continuing south, it splits again to turn west along the southern edge of the main buildings where it terminates at a point where it meets a footpath. Therefore, as this access road does not extend around the Retreat, can this inner green belt boundary have been reasonably derived?

The more appropriate Inner Green Belt boundary is provided in EX/CYC/18d – TP1 Addendum Annex 3 – Section 7 Boundary 16 Green Dykes Lane, Garrow Hill and Heslington Road, which is described in the following way:

The boundary then continues from the south of Green Dykes Lane and Garrow Hill until Thief Lane/Heslington Road. This then continues along to the west of Heslington Road until St Lawrence's Primary School... . This boundary follows the south carriageway edge of Heslington Road and thus conforms to NPPF 2012 Item 85: for defining boundaries as it provides physical features that are readily recognisable and likely to be permanent.

Regarding 'Consistency with the Green Belt methodology, EXCYC/59 TP1 Approach to defining Green Belt Addendum January 2021'.

8.48 states: the boundary should follow the curtilage of properties except where large areas that extend up to existing countryside and are not encompassed by built form and contribute to openness.

This description is more appropriate for defining the inner green belt boundary as: The Retreat is bounded on the north, west and south sides by a high brick wall, however, there is no such wall on its east side and is therefore not encompassed by built form, also, the large area of land to the south of the main buildings of The Retreat are bounded on the east side by a linear strip of field, known as the East Field, with a north-south footpath from the Stray on its east side, therefore extending the extensive open grounds of the Retreat, via this 'East Field', into the existing countryside in the form of Walmgate Stray. Thus massively contributing to the openness of the area.

Therefore, I ask that PM89 be rejected in favour of the proposed inner green belt boundary as detailed in EX/CYC/18d – TP1 Addendum Annex 3 – Section 7 Boundary 16 Green Dykes Lane, Garrow Hill and **Heslington Road**.

The Green Belt Boundary Section 8 Boundary 15 East of the Racecourse and Boundary 16 Campleshon Road has not been reasonably derived.

Note: PM93 is in Section 8. Should this topic cover Sections 5-8?

The proposed modification PM93 York Racecourse: Proposes that the green belt boundary should follow the edge of the built footprint of dense development and the edge of the carriageway of Racecourse Road.

The reason for this proposed modification is: Consistency with the Green Belt methodology.

This proposed inner boundary modification (PM93) excludes a most important piece of land that is located on the corner of Campleshon Road and Racecourse Road. This land is part of Green Wedge C5 (SD107).

The previous section of the proposed boundary, i.e. Section 8 - Boundary 14 - The Residence, as detailed in EX/CYC/59e, places that part of Green Wedge C5 to the south of the Residence within the inner green belt, then, as a part of Green Wedge C5, the aforementioned land on the corner of Campleshon Road and Racecourse Road should also be placed within the inner green belt.

Area C5 Extension to Micklegate Stray is described as follows:

- Open grassland and allotment gardens between Bishopthorpe Road and the Knavesmire providing an open setting along the approach road to York
- Affords good views of Terry's Factory tower.

It should be noted that the description under 'Compactness (Criterion 1)' for Section 8 - Boundary 14 - The Residence, is incorrect. The description provided states:

1.1 The open land to the south and east of the proposed boundary is within Green Wedge C4 – extension to Middlethorpe and Fulford Ings.

This description actually applies to the previous Section 8 Boundary 13 – (Tarmac Car Park) Chocolate Works, Bishopthorpe Road.

Note: Green Wedge C4 is on the east side of Bishopthorpe Road and Green Wedge C5 is on the west side of Bishopthorpe Road.

As that part of Green Wedge C5 to the south of the Residence has been placed within the Inner Green Belt boundary then it is only reasonable that the part of Green Wedge C5 adjacent to Section 8 Boundary 15 East of the Racecourse and Boundary 16 Campleshon Road is also placed within the Inner Green Belt boundary

Therefore, I ask that PM93 be rejected in favour of the proposed inner green belt boundary as detailed in EX/CYC/18d – TP1 Addendum Annex 3 – Section 8 Boundary 15 East of the Racecourse and Boundary 16 Campleshon Road