



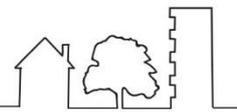
**AIREDON**  
PLANNING & DESIGN

## York Local Plan Examination

Phase 4: Matter 1 Statement

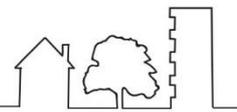
Mr J Harrison

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### **Matter 1 – Green Belt Boundaries**

1. The analysis set out in the document analysing Green Belt boundary locations (3x-cyc-59b-topic-paper-1-Green-belt-addendum-january-2021) demonstrates that the Green Belt has not been properly assessed, and boundaries have not been set in accordance with the guidance in the NPPF.
2. The analysis sets out a number of criteria against which areas of land have, apparently, been considered. The first one is ‘Purpose 4 – preserving the setting and special character of historic towns’. It is interesting to note that, whilst the outer areas, outside the villages, are considered against this criterion, despite being nowhere near the edges of the urban area of York (which is what the Council have said is their consideration on this aspect), these outer areas are considered to be ‘sensitive as part of a wider view of a dense compact city’ even though areas of land closer to the edge of that dense compact city are not important for this factor: this suggests that there is a discrepancy between the assessment of different parts of the Green Belt, and that different areas have been assessed against different guidelines and criterion.
3. It is also important to note that, whilst in evidence presented so far, the Council have been indicating that it is the special character of ‘York’ that is important, in this aspect of the assessment, the villages are also given their own level of importance – again, this shows that there are different assessments carried out for different areas of the Green Belt and that some areas have been given increased importance through the inclusion of additional criterion.
4. Landscape and Setting – Criterion 3 looks at the ‘historic relationship of the city to its hinterland’ – again, this has been assessed very variably, with different levels of values placed depending upon whether the Council wants to allocate a site, rather than whether the land in question has any value or degree of value to landscape setting.
5. ‘Checking Unrestricted Sprawl’ – The assessments include a plan which identifies areas ‘without access to 2 or more services and indicates that these area ‘Areas preventing Sprawl’. However, the land at ST14 does not have access to 2 or more services and indeed part of the original site was identified as creating sprawl and therefore the southern boundary was pushed further back from the ring road – so this assessment is not an appropriate measure to be using in this way. Indeed, it would have been much better to have assessed all the areas which could result in sprawl and identify them on a map properly – and this would have identified a significant area around the ring road, and key areas around the outlying villages that need to be protected. However, access to services is not an appropriate technique for identifying appropriate boundaries, or whether sites should be included within the Green Belt or simply retained as part of the open countryside.



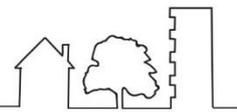
6. 'Safeguarding the Countryside from encroachment' – all the open areas around York fulfil this Green Belt function, but some are more important. This assessment is not particularly helpful in identifying where the Green Belt boundaries should be set, and which areas should simply be maintained as open countryside.
  
7. One of the critical issues in defining boundaries in the draft York Local Plan is that the land within the proposed boundary has not been properly assessed in the first place: the boundaries appear to have simply been drawn as close to the LPA boundary on the outer reaches as possible (even if there is no defined boundary feature in this location) and as close to existing development to the inner boundary and those around inset villages as possible, with no proper assessment of whether the land has a strong Green Belt function within the boundaries. On top of that, there are many places where boundaries have been chosen that do not follow strong boundary features as required by the NPPF or, in several locations, simply cross an open field. This means that the plan in its present form is not consistent with the requirements of the NPPF.

*(Question 1.1) Are the inner Green Belt boundaries (Topic Paper 1 Addendum Annex 3 – Sections 1-4) reasonably derived?*

8. Given the methodology for setting the Green Belt Boundaries in sections 1 – 4 are the same as those used in Sections 5 – 7 and the outer boundaries, they fall short of the required consistency with the NPPF and therefore it is concluded that they are not reasonably derived.

*(Question 1.2) Are the inner Green Belt boundaries (Topic Paper 1 Addendum Annex 3 – Sections 5-12) reasonably derived?*

9. No, the inner Green Belt boundaries are not reasonably derived.
  
10. The inner boundaries Sections 5-7 are also marred by the same lack of a proper assessment of the Green Belt importance of land. For instance, Sections 5: Boundaries 22-27 do not have any 'special character' areas adjacent to them, but the analysis on Page A3:443 indicates that it is necessary to keep the land open to prevent urban sprawl, and that the land is 'sensitive' as part of the wider view of a dense compact city. However, despite this, the site to the north of Monks Cross is allocated within this area of land. Notwithstanding this allocation, rather than accept that this area of land will become developed, a small sliver of land is maintained as Green Belt in between boundary Sections 22, 23 and 24 to 26 and 27a.
  
11. This makes absolutely no sense in Green Belt terms as this thin sliver of land will not be able to fulfil the purposes of Green Belt: it will not prevent urban sprawl because this narrow area would not be sprawl, and indeed fulfils the requirement for accessibility. It will not impact upon

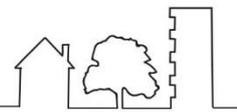


the setting of the urban area as it is too narrow to fulfil this function, and it will not prevent the coalescence of settlements. The assessment suggests that it 'prevents coalescence of the different districts' but that could simply be achieved by creating a landscape buffer (and public access routes) between the two sections and preventing access between the two sections of the area.

12. It simply again highlights the lack of the original assessment of Green Belt importance of land, and then the misguided setting of Green Belt boundaries to follow existing development lines rather than appropriate boundaries for the Green Belt. Indeed, Boundary 27a does not following existing permanent features that can form a long-term permanent Green Belt boundary – and the assessment acknowledges that it 'does not follow any features on the ground'.
13. These examples demonstrate that the Green Belt boundaries have not been properly considered and that different weights have been given to the same properties in different areas of the proposed Green Belt. This stems from the fact that the Green Belt has not been properly assessed and that the methodology aims to justify the boundaries chosen, with no real regard to whether the land will perform a Green Belt function or whether it is necessary for it to be retained as Green Belt, or indeed whether it performs an important role within the Green Belt. This has led to arbitrary boundaries which often do not follow permanent features as required by the NPPF and the inclusion of land which does not need to be included within the Green Belt.

*(Question 1.3) Are the Green Belt boundaries of 'Other Densely Developed Areas' (Topic Paper 1 Addendum Annex 4) reasonably derived?*

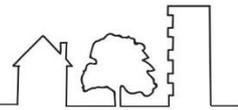
14. No, the Green Belt boundaries of the 'Other Densely Developed Areas' are not reasonably derived. As set out above, one of the areas that York have suggested is particularly important in relation to the Green Belt around York is the preservation of the Historic city within Green Belt. Part of this character is having surrounding villages within that Green Belt – but it is not to ensure that those villages are themselves restricted in size. However, as York have failed to assess the land within the proposed Green Belt against a consistent set of criteria (indeed, any criteria) before trying to set boundaries it is not possible to identify where land on the edge of the villages might be able to be developed without impacting upon the most important Green Belt functions for this Green Belt. For instance, the land to the south of Skelton has been suggested to be important to creating a gap between York and this village, but we have seen from ST14 that it is not important that this gap is the width that it is between Skelton and the northern edge of York: development of this land would be in a very sustainable location, with access to services within the existing village, as well as access to an existing public transport



route – arguably significantly more sustainable than ST14. It is therefore obvious that the boundaries have not been reasonably derived due to the lack of a proper assessment of Green Belt land to start with which would have helped identify whether land should be included within or excluded from the Green Belt.

*(Question 1.4) Are the outer Green Belt boundaries (Topic Paper 1 Addendum Annex 2) reasonably derived?*

15. With reference to Paragraph 6 above regarding safeguarding the countryside from encroachment, the Section of boundary at 1.4 follows the authority boundary and the assessment (Page 21) states ‘while the field immediately to the north and west are of a similar age, style and legibility it is not within the scope of this study to assess land outside of the authority boundary’. The land directly to the west of the proposed boundary has exactly the same value as that to the east and yet it is acceptable for that to be open countryside, and the site inside the boundary to be Green Belt even though it is no more important than land to the west. This, of course, does not mean that the land to the west will be developed as it is not in the Green Belt, because it is not in a sustainable location, but does highlight that there has been no real consideration of whether a parcel of land really needs to be Green Belt or not.
16. There are several instances where boundaries do not follow the guidance set out in the NPPF. For instance, Section 1: Boundary 7 (open field north-west of Lock House to River Foss) crosses an open field, following absolutely no boundary marking at all, albeit this follows the LPA boundary line.
17. It is clear that the Green Belt has been considered solely as the basis for preventing development of this site and the fact that the boundaries are not acceptable for Green Belt purposes has not been considered. It would have been much more appropriate to draw the Green Belt boundary along the strong southern and eastern boundary of this site and rely upon open countryside policies to protect this site from development rather than Green Belt policies, particularly as this location also benefits from being within an area of open space and nature conservation value. Drawing the line in the location which would benefit from long-lasting Green Belt boundaries would not result in the long-term development of the site as it is not close to existing services, facilities or properties that would enable it to be considered as a sustainable location for development.
18. It is suggested that this land ‘contributes to understanding the original siting and context of York Minster and its visual dominance over the landscape – but it does not fall on or close to key views and the location of the Green Belt boundary to an appropriate, long-term, permanently marked boundary would not impact upon this in any way.



19. Similarly, whilst the majority of Section 1: Boundary 8 (River Foss east of Lock House) follows a recognisable boundary, it then follows 'a crop line' across a field to the Black Dike. It would have been more sensible to use a clear feature for the whole of the boundary and follow a boundary that is acceptable under the NPPF. Leaving this field to the north of the Green Belt boundary, in the understanding that, just because the land is not in the Green Belt, does not necessarily mean that it is acceptable for development purposes.
  
20. It is clear that the outer boundary defined by York suffers from exactly the same problem as the inner boundary and the boundary to the other built up areas: York have not carried out an adequate Green Belt assessment of land in order to determine whether it should be included or excluded from the Green Belt and have simply sought to include as much land within the Green Belt as possible, unless they have decided to allocate it even if it is important to the Green Belt. Furthermore, boundaries chosen are arbitrary and in many instances do not follow boundary features at all, let alone the strong boundary features required by the NPPF.