

**Local Plan Examination**

**December 2022**

**Response to inspector's email of 16th November  
regarding Green Belt boundaries**

**1. Introduction**

1.1 This note provides a response to correspondence from the Inspectors dated 16<sup>th</sup> November which stated as follows:

“Site visits have shown up a few concerns about detailed Green Belt boundaries. In particular, these relate to the approach to sports fields that are part of a wider complex where the boundary has been drawn tight around buildings, rather than the overall complex itself. This does not appear correct where the sports facilities involved involve enclosures of significant height, floodlighting, and other facilities, that make little or no contribution to openness. It seems to us that in these cases, the boundary would be better drawn around the curtilage of the facility involved, especially when boundaries to that curtilage are significant in themselves, and more easily defensible. As examples, we would point to the approach taken to Queen Elizabeth Barracks, where an area within the eastern part of the complex has been included in the Green Belt despite the presence of significant infrastructure. Also, at St Peter's School, the flood defence bund would appear to be a more rational Green Belt boundary than the school buildings (some of which are scheduled for replacement in any event) given the nature and scale of the sports facilities behind it. Similarly, the (very strong) boundaries of the school grounds, rather than the buildings, at the Joseph Rowntree School, and Burton Green Primary School, would seem to us to offer more easily defensible Green Belt boundaries. There may be other examples too and we would encourage you to review other boundaries of this type, in the light of our comments”.

1.2 This note looks initially at those specific examples before considering other boundaries of the same type. As is explained further below, the Council proposes modifications to reflect the concerns expressed by reference to the specific examples given. It also proposes modifications in some other cases where the concerns expressed by the Inspectors are considered to arise. Finally, it has considered other possible cases where those concerns may arise, but it is not convinced that they do so as to justify proposing modifications. In these final marginal cases, however, the Council has indicated a reasonable alternative boundary to assist the Inspectors in the event that they consider modifications to be necessary.

## **2 Boundaries specifically mentioned**

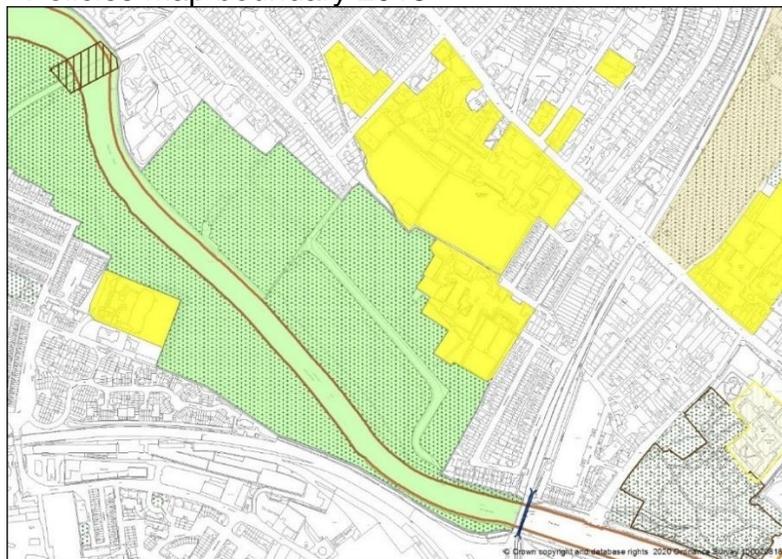
The Inspectors have raised concerns about sports fields that are part of a wider complex where the boundary has been drawn around buildings, rather than the overall complex itself, in particular where the sports facilities make little or no contribution to openness. This section addresses the specific examples provided and in each case proposes modifications in line with the concerns expressed. The Council recognises that applying the methodology to define Green Belt boundaries will involve exercises in judgment, which may differ in respect of specific sites and boundary sections; and in a number of instances the changes now proposed follow alternative boundaries considered within the document.

## 2.1 St Peters School

The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59c Topic Paper 1 Green Belt Addendum January 2021 pages A3:199 – A3:226. The reasons for the boundary as indicated in the Topic Paper included the following: the maintenance of the historic character and setting of York; the reinforcement of the pattern of historic green wedges that assist in understanding the historical relationship of the city to its hinterland; the containment of further sprawl into undeveloped areas; and the safeguarding of the wider recreation land containing the green wedge. The land outside the proposed boundary was considered to be characterised by an absence of urbanising influences; and outdoor sports and recreation uses were considered acceptable having regard to their effect on openness.

Reflecting the Inspectors' judgment on the contribution of this land, including sports facilities, to Green Belt openness and the strength of the proposed boundary, a modification is now proposed so that the Green Belt boundary follows the existing flood defences, which provide a permanent and recognisable boundary. The education allocation (yellow) is also proposed to be extended across the whole school site for consistency in approach with other educational sites. This is not shown on the proposed modification below to provide clarity in terms of the proposed Green Belt boundary but will be added to the Policies Map for public consultation.

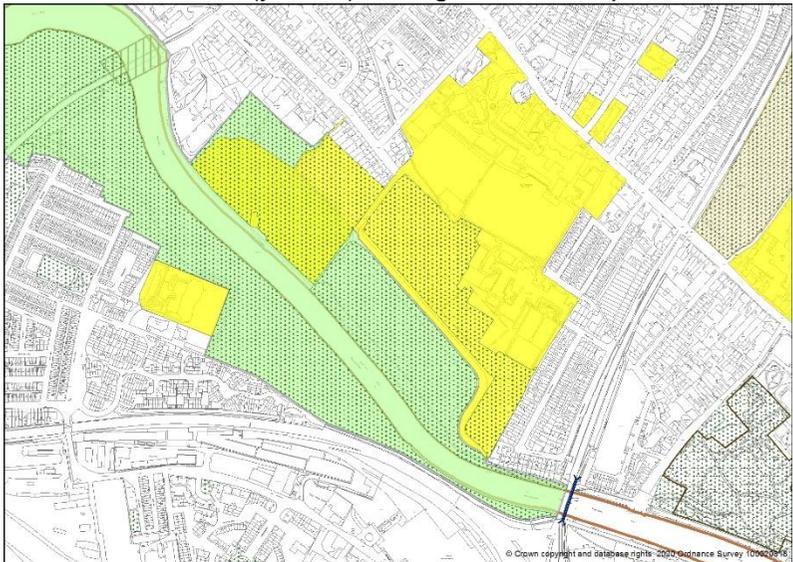
Policies map boundary 2018



Proposed modification Dec 2022 showing revised extent of GB



Proposed modification Dec 2022 showing revised extent of school allocation (yellow) sitting over the top of the GB allocation



## 2.2 Queen Elizabeth Barracks

The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59f Topic Paper 1 Green Belt Addendum January 2021 pages A4:245 – A4:268. The relevant boundary is boundary 5, the location of which was identified as important for preventing coalescence with neighbouring villages and restricting sprawl by containing the barracks site.

Reflecting the Inspectors' judgment on the contribution of this land to openness, as well as the strength of the boundary, a modification is now proposed so that the Green Belt boundary follows the line of existing fencing in the south east corner of the barracks site, enclosing the existing obstacle course and other facilities in that area.

Policies map boundary 2018



Proposed modification Dec 2022

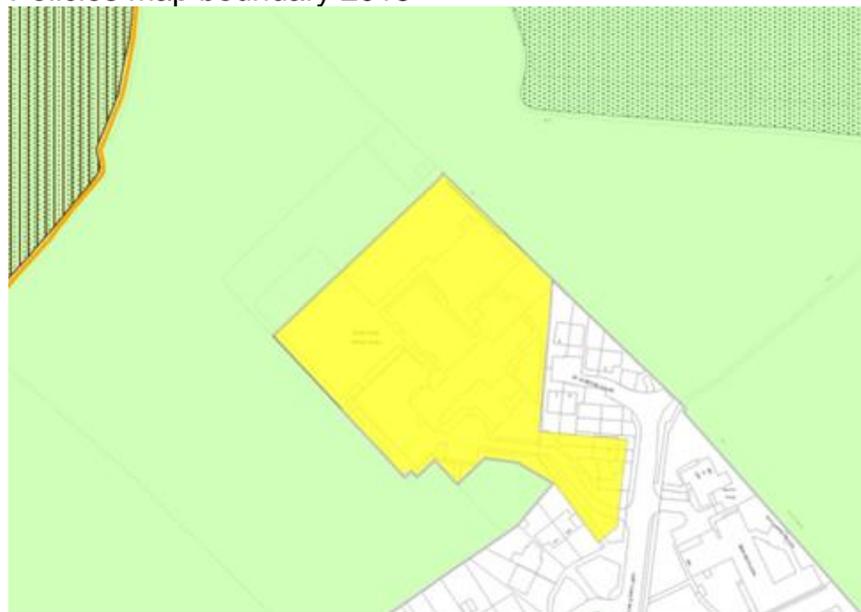


## 2.3 Burton Green Primary School

The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59c Topic Paper 1 Green Belt Addendum January 2021 A3:329 – A3:334. Land in this location was identified as important for the historic character and setting of York and in particular in relation to the green wedge and Bootham Stray. The proposed boundary sought to control unrestricted sprawl across the wider school grounds and to protect the countryside from encroachment. The boundary as proposed in 2021 had drawn in the boundary from that proposed in the 2018 policies map.

Reflecting the inspectors' judgment on the contribution of this land to openness, as well as the strength of the boundary, a modification is now proposed so that the Green Belt boundary follows the curtilage of the school site. The education allocation (yellow) is also proposed to be extended across the whole school site for consistency in approach with other educational sites.

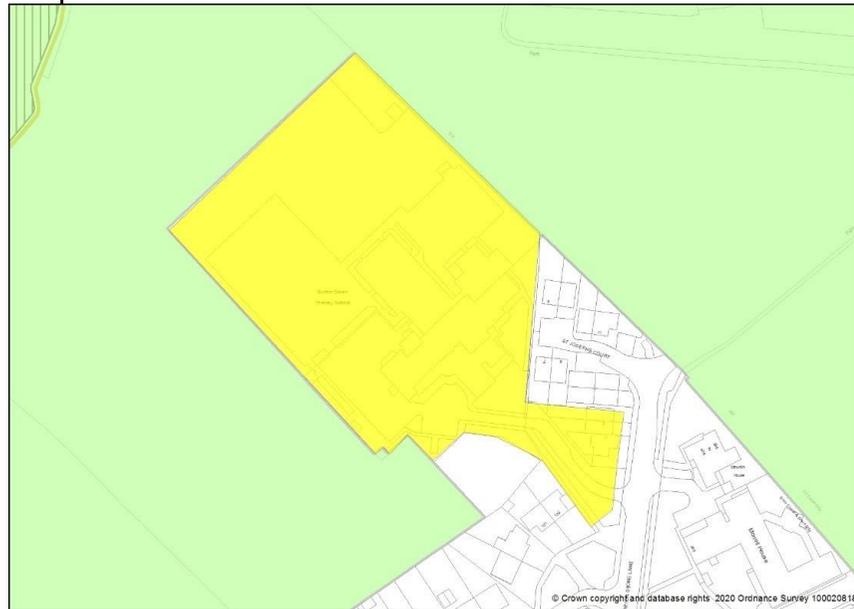
Policies map boundary 2018



Proposed modification 2021



Proposed modification Dec 2022

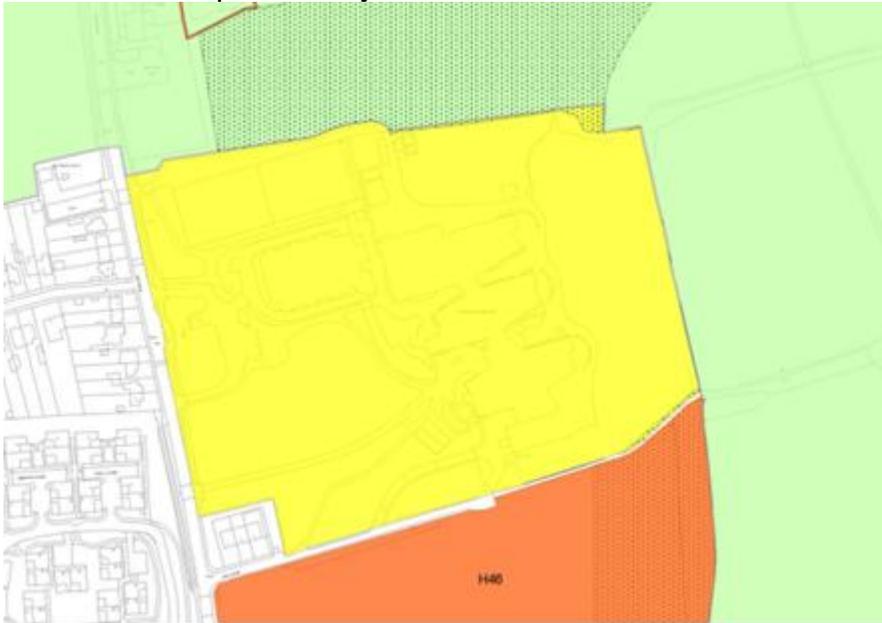


## 2.4 Joseph Rowntree School

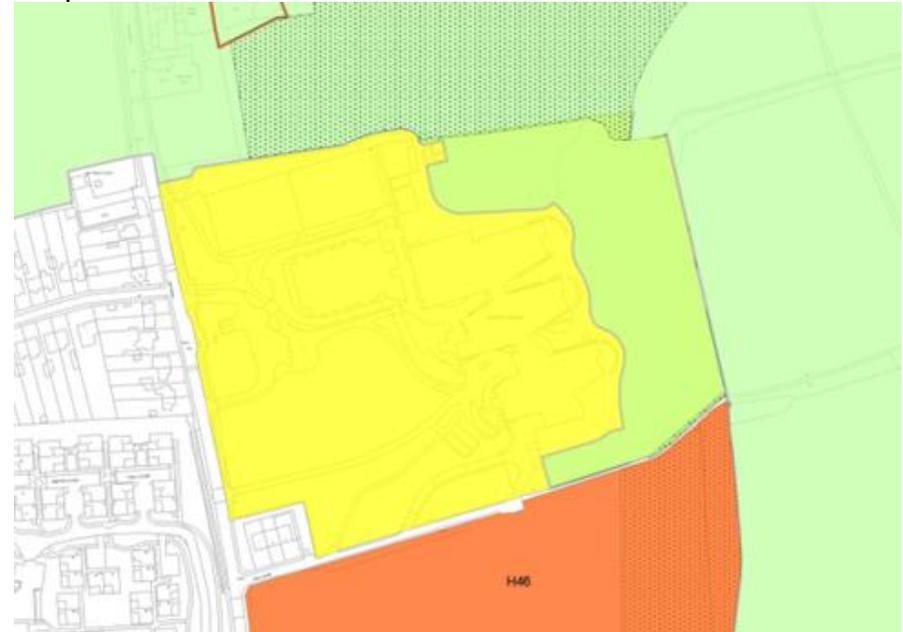
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59d Topic Paper 1 Green Belt Addendum January 2021 A3:396 – A3:402. The land in this location was included given its role in long range views of the city. The proposed boundary sought to prevent coalescence with neighbouring villages and to protect the open land beyond from encroachment.

Reflecting the Inspectors' judgment on the contribution of this land to openness, as well as the strength of the boundary, it is now proposed that the Green Belt boundary be widened, reverting to that proposed in the 2018 policies map.

Policies map boundary 2018



Proposed modification 2021 – to be withdrawn



### **3 Boundaries of same type raising similar issues**

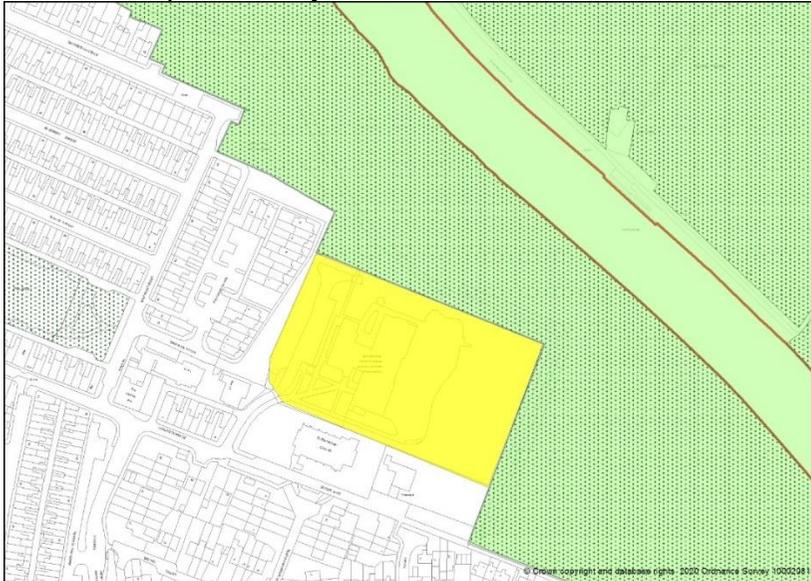
Following on from the consideration of the specific sites identified by Inspectors, the Council has identified a limited number of other sites with similar features which are considered to raise the same issues. They are set out below.

### 3.1 St Barnabas School

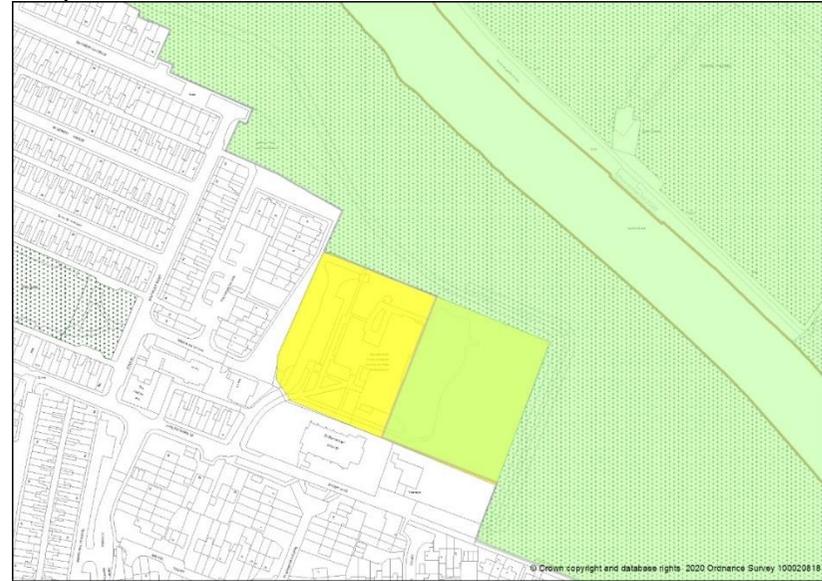
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59c Topic Paper 1 Green Belt Addendum January 2021 A3:180 – A3:186. The open character of the green wedge was identified as contributing to the contained urban form of the compact city. The boundary was proposed to prevent unrestricted sprawl and to safeguard the countryside from potential encroachment resulting from further development within the school site.

It is acknowledged that the views of the Inspectors, on the contribution to openness of land and the strength of boundaries, apply similarly to this site. It is now proposed that the Green Belt boundary reverts to that in the 2018 Policies map.

Policies map boundary 2018



Proposed modification 2021 – to be withdrawn

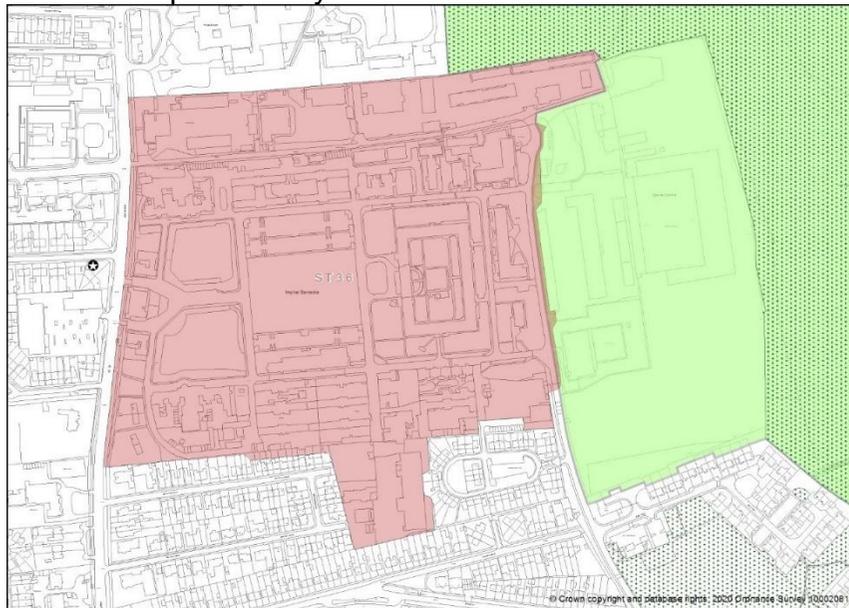


### 3.2 Imphal Barracks

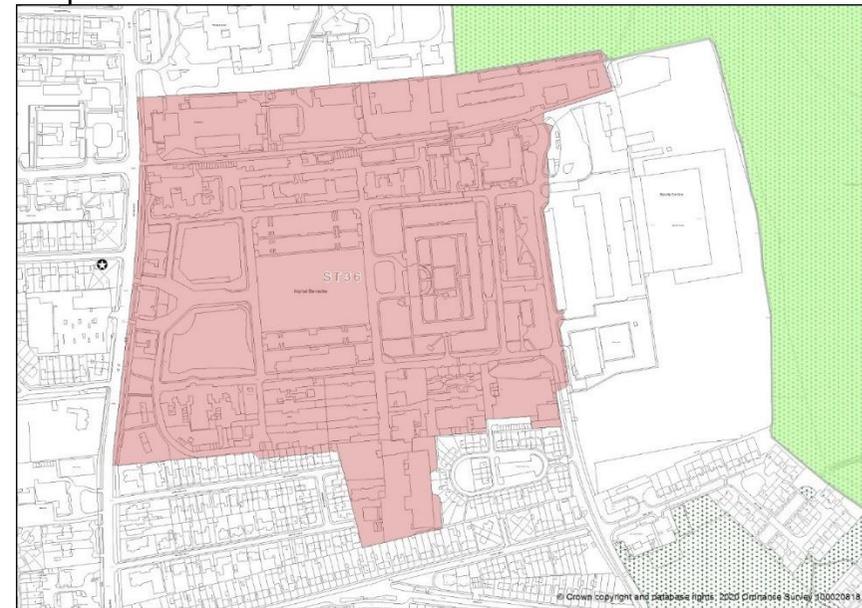
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59e Topic Paper 1 Green Belt Addendum January 2021 A3:741 – A3:749. The open character of the green wedge and Walmgate Stray was identified as contributing to the setting of the historic city. The boundary was proposed to prevent unrestricted sprawl resulting from the intensification of the existing sports facilities and to prevent encroachment into the Green Belt.

It is acknowledged that the views of the Inspectors, on the contribution to openness of land and the strength of boundaries, apply similarly to this site. A modification is now proposed so that the Green Belt boundary follows a recognisable and permanent boundary in the form of the site boundary thereby removing sports facilities associated with the barracks from the Green Belt.

Policies map boundary 2018



Proposed modification Dec 2022

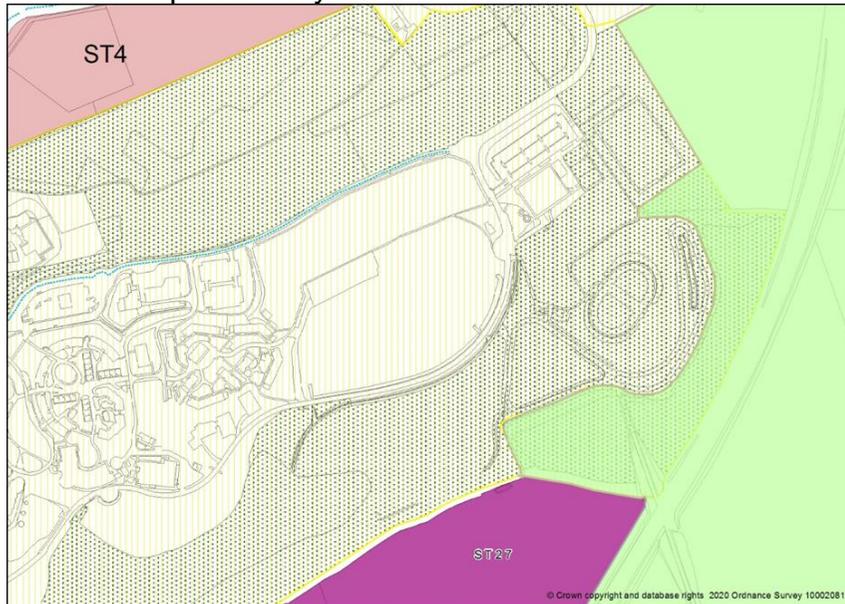


### 3.3 University of York

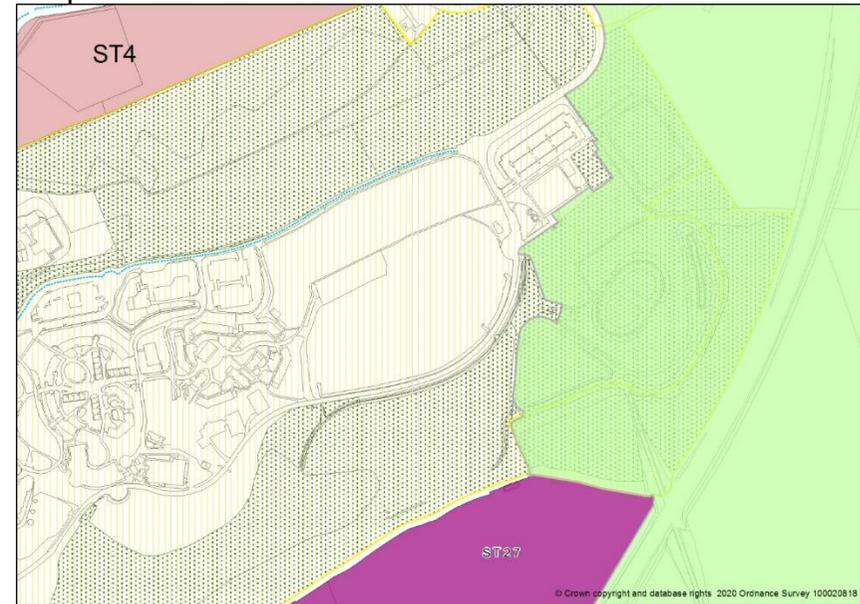
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59e Topic Paper 1 Green Belt Addendum January 2021 A3:670 – A3:678. This acknowledges that boundaries have been set to retain a sense of the compact city within an open and rural landscape. It also seeks to prevent sprawl and further encroachment by containing the built area and designating lower density outdoor sports facilities within the Green Belt.

It is acknowledged that the views of the Inspectors, on the contribution to openness of land and the strength of boundaries, apply similarly to this site. The 2021 modification followed existing features including roads and building lines which were considered to provide permanent and recognisable boundaries and moved sports facilities into the Green Belt. It is now proposed that the Green Belt boundary reverts to that in the 2018 Policies map. This would remove the sports facilities from the Green Belt, utilising a boundary that includes roads and field boundaries, again permanent and recognisable features.

Policies map boundary 2018



Proposed modification 2021 – to be withdrawn



### 3.4 The Poppleton Centre

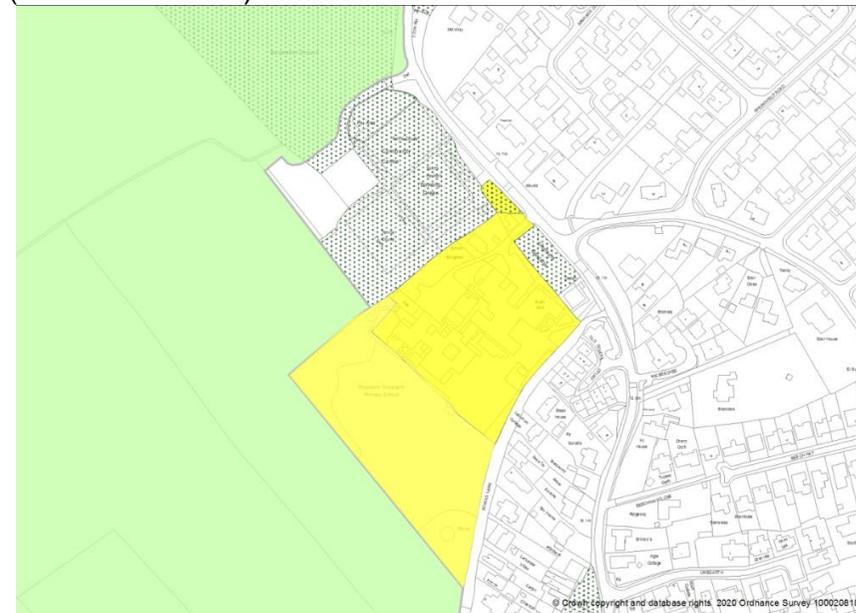
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59f Topic Paper 1 Green Belt Addendum January 2021 A4:279 – A4:300. In relation to the relevant boundary section 2, the Topic Paper notes that there is a distinct urban edge providing less risk of sprawl. Land beyond the boundary has a strong sense of openness and is characterised by an absence of built development.

While reviewing the boundaries at Poppleton Ousebank Primary School (Section 4 below) the Council considered that it would also be appropriate to consider those at the Poppleton Centre, directly to the north west of the school. In this instance, the Council had previously concluded that the site accommodated an appropriate Green Belt use and therefore the boundary was appropriate. Notwithstanding this it is recognised that the sports centre could be considered not to contribute to openness and applying the Inspector's concerns to this site there is an alternative to the Green Belt boundary as shown in the Policies map 2018. As such, a modification is proposed to revise the boundary and remove Poppleton Centre from the Green Belt.

Policies map boundary 2018



Proposed modification Dec 2022 (Ousebank Primary School (Section 4 below))



#### **4 Other boundaries for consideration**

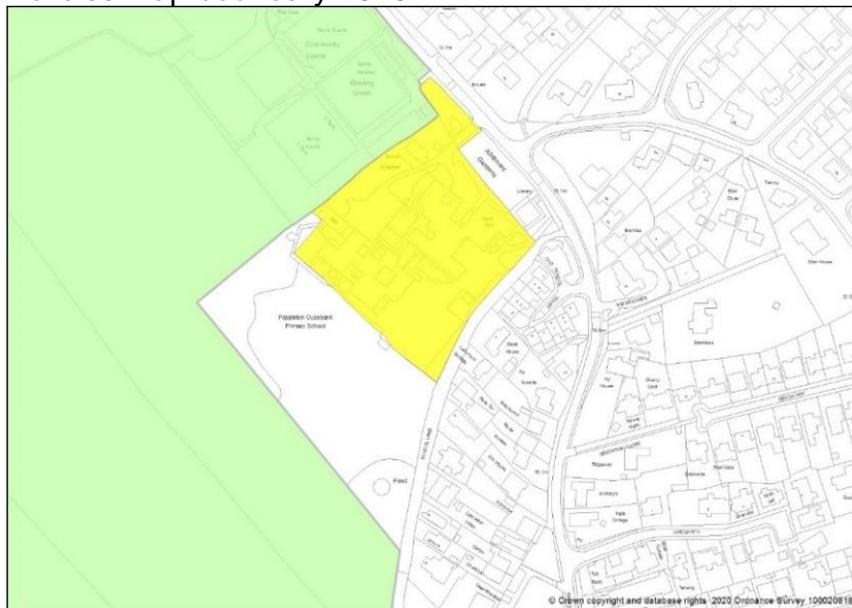
The Council has considered whether there are other sites which may be considered to raise similar concerns to those identified by the Inspectors. The Council has identified these below. It does not consider that modifications are required for these parts of the boundary but recognises that when applying the methodology for boundary setting different judgments may be reached regarding the proper boundary. It therefore identifies potential alternative boundaries should the Inspectors consider instead that their concerns should be addressed by changes to the boundary as currently proposed. The Council has also identified a further section of boundary at York University which does not fall within the scope of the Inspectors' concerns, but which justifies a proposed modification alongside the other boundary at the University (see above). This is addressed at the end of this section.

## 4.1 Poppleton Ousebank Primary School

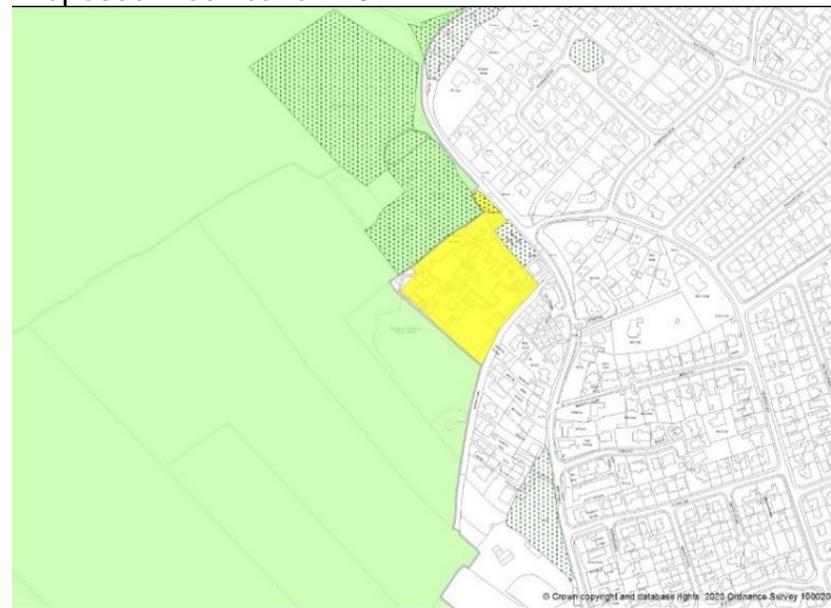
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59f Topic Paper 1 Green Belt Addendum January 2021 A4:279 – A4:300. In relation to the relevant boundary section 2, the Topic Paper notes that there is a distinct urban edge providing less risk of sprawl. Land beyond the boundary has a strong sense of openness and is characterised by an absence of build development.

In this instance, the Council consider that there is no need to revise the Green Belt boundary as proposed in the 2021 modifications as there are no sports facilities within the playing fields to the west of the school buildings. However, it is recognised that the school boundary would provide an equally clear and recognisable boundary. If the Inspectors considered that their concerns also applied to this site, proposed modifications could confirm the proposed boundary as shown in the policies map 2018. This is shown in the Dec 2022 possible modification below where the Poppleton Centre (detailed at 3.4 above) is shown as removed from the Green Belt and, for consistency, the yellow education allocation is extended across the whole of the school site.

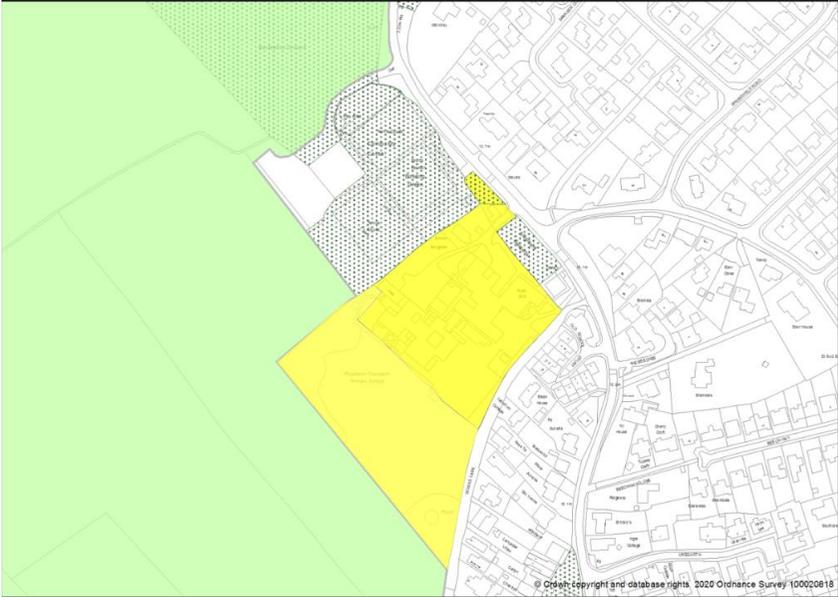
Policies map boundary 2018



Proposed modification 2021

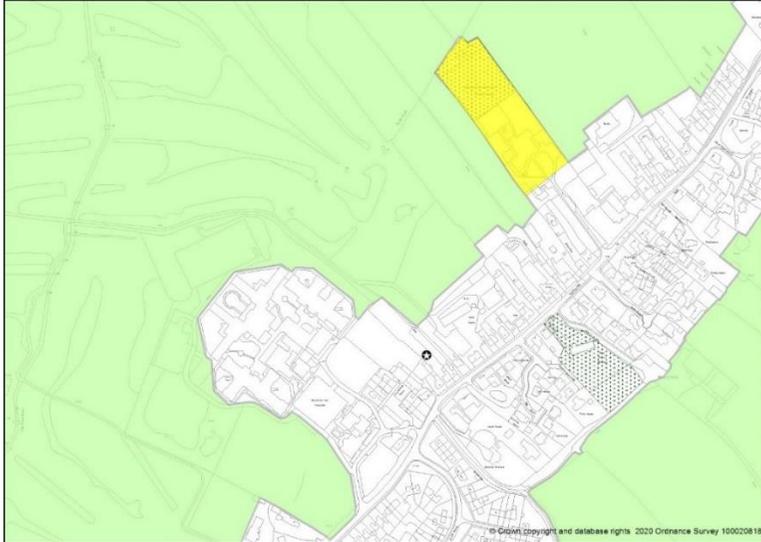


Possible modification Dec 2022





Possible modification Dec 2022

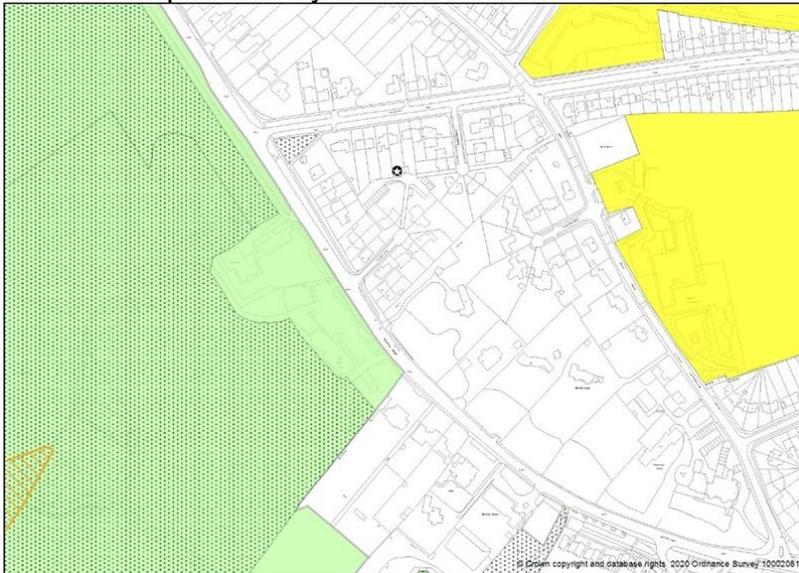


### 4.3 York Sports Club

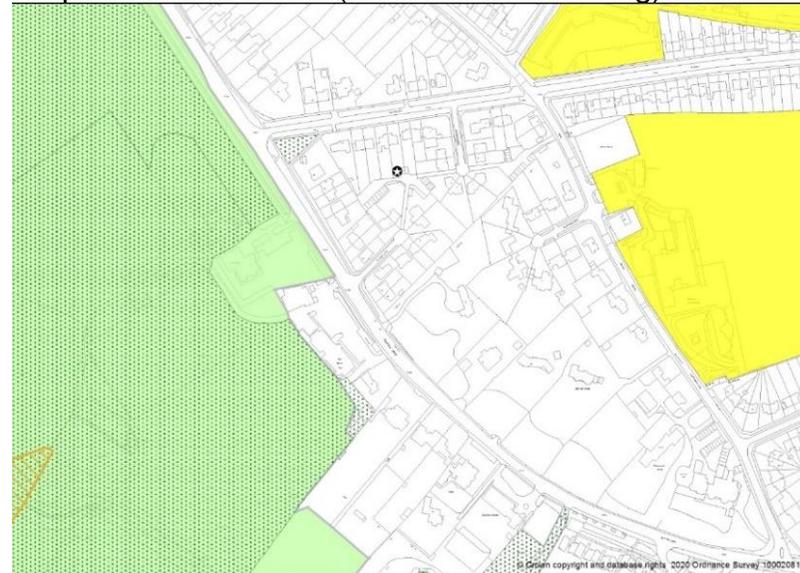
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59c Topic Paper 1 Green Belt Addendum January 2021 A3:263 – A3:271. The land within the Green Belt is part of a green wedge and important for views of the city within a rural context. The boundary contains ribbon sprawl along Shipton Road and protects the countryside from encroachment.

This boundary was discussed during the Phase 4 hearings, and it was agreed that the boundary would be modified to include the sports club and associated car park as per the proposed modification below. The Council has reviewed the wider sports club fields. These contain a number of structures spread over a wide area and associated with the sports use. However, given the size of this area and its connection with the wider tract of land including Clifton Ings, it is considered that the site does display a good level of openness and that no further modifications are necessary. If the Inspectors consider that their concerns apply to this site, the Council has provided a possible alternative boundary to give an indication of the impact of such a change.

Policies map boundary 2018



Proposed modification (from Phase 4 hearing)



Possible modification Dec 2022

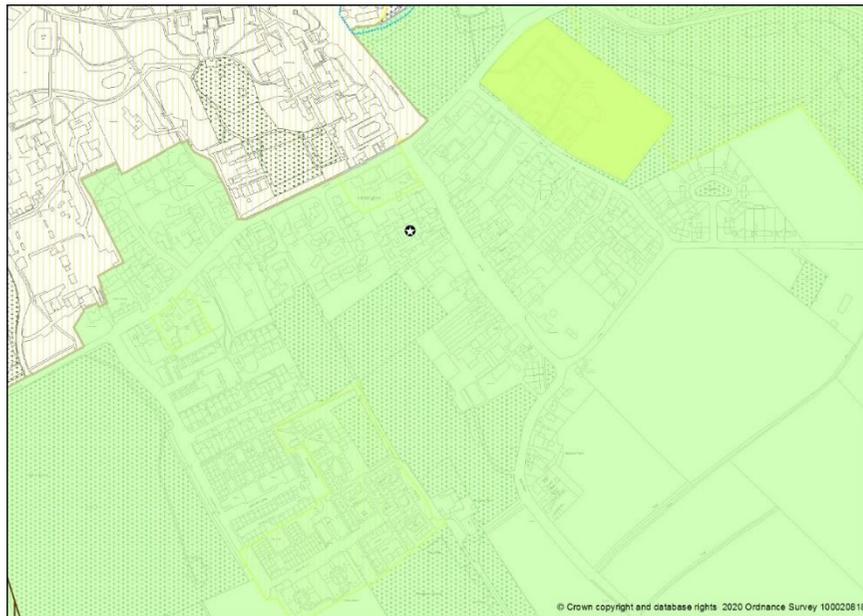


#### 4.4 Lord Deramores School

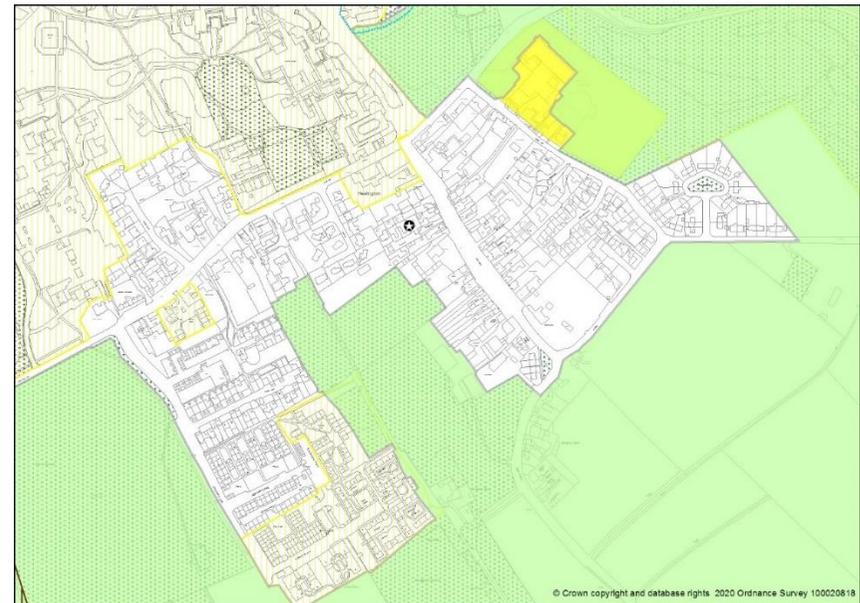
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59e Topic Paper 1 Green Belt Addendum January 2021 A3:701 – A3:710. Boundary 13 is specific to this site. Land beyond the boundary is important in views of the compact city within its rural hinterland. The boundary is set so as to preserve this, to contain built development and prevent urban sprawl.

The boundary around the school has been considered alongside other similar school sites adjacent to the Green Belt. The Council consider that the modification proposed in 2021 is sound. The proposed boundary follows the extent of the built up area and there are no sports facilities associated with the school in the playing fields beyond the boundary. However, it is recognised that there is an equally clear boundary around the curtilage of the site. If the Inspectors consider that their concerns apply to this site, the Council suggests a potential modification as set out below.

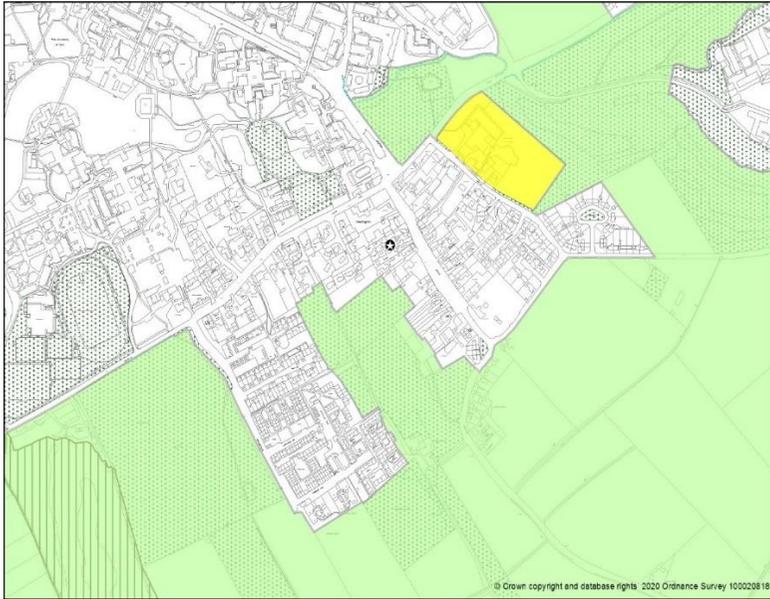
Policies map boundary 2018



Proposed modification 2021



Possible modification 2022

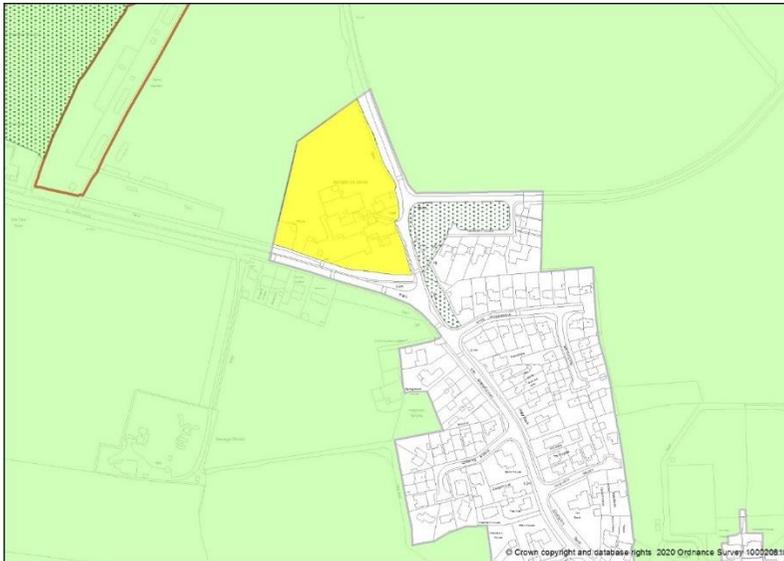


## 4.5 Elvington Primary School

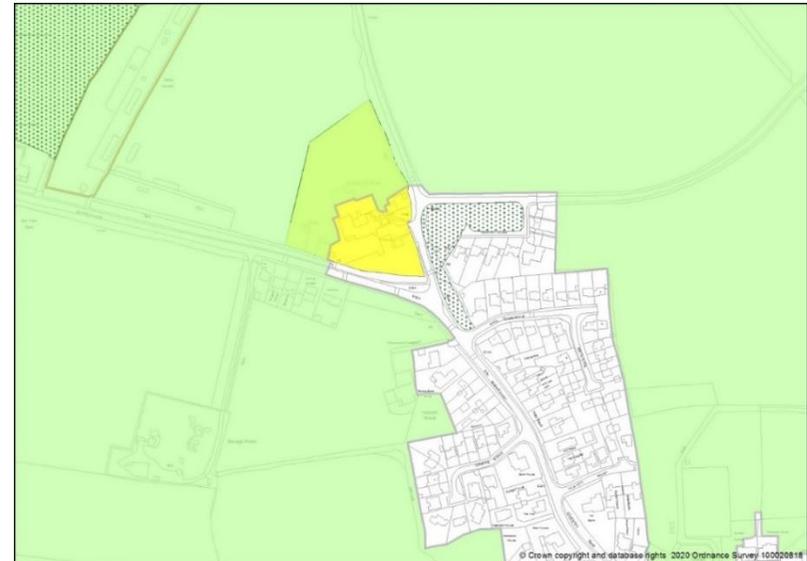
The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59f Topic Paper 1 Green Belt Addendum January 2021 A4:81 – A4:98. The boundary specific to this site is boundary 1. The assessment notes that the boundary is built tight to the developed area to prevent coalescence between the village and business park, thereby retaining a compact village. The boundary follows the built footprint of the school, the playing fields beyond display a high degree of openness.

This site has also been considered in light of the Inspectors' comments. There are no sports facilities within the playing fields and a change to the Green Belt boundaries is not considered justified in relation to this aspect alone. However, if the Inspectors consider that their concerns apply to this site, the boundary could revert to that shown in the policies map 2018 which follows the school curtilage.

Policies map boundary 2018



Proposed modification 2021



## 4.6 University of York

The assessment of the Green Belt boundaries in this location is contained within EX/CYC/59e Topic Paper 1 Green Belt Addendum January 2021 A3:691 – A3:700. This land is important for retaining the separation of the city from the University of York East Campus. The boundaries in this area have been set to contain the built area and prevent unrestricted sprawl. As a result of the flat topography and clear views, there is a strong sense of visual continuity with the countryside beyond this boundary.

When reviewing boundaries on the eastern side of Campus East it was noticed that the proposed boundary in this location does not account for recent planning consents. For this reason, a modification is proposed which deals with this inconsistency. The revised boundary follows permanent and recognisable features predominately the two bodies of water to the north and west of the built up campus with the southern lake edge providing a boundary and a connection to the allocation at ST27.

Policies map boundary 2018



Proposed modification Dec 2022

