

Site Selection Technical Paper (June 2013)

Annex 21 - Safeguarded Land Technical Paper

Background paper Safeguarded Land

Introduction

1. This paper describes the process used to determine how much safeguarded land is required and the choice of sites that are proposed as safeguarded land in the local plan.
2. The paper begins with an outline of the purpose of the York green belt as this provides the context for the proposals to safeguard land for longer term development needs and the choice of sites. It then sets out why there is a need to safeguard land in this way and finally explains the process for choosing the sites.

Green Belt

3. The principle of a Green Belt around York is long established it was most recently reconfirmed in the RSS adopted in 2008. Some of the outer boundaries of the Green Belt have been agreed in adjoining Authorities Development Plans. The Local Plan sets out the purpose of the Green Belt and finalises the inner boundary and those parts of the outer boundary that lie in the City of York Local Authority area.
4. The policy guidance for Green Belt is set out in the National Planning Policy Framework (NPPF). This states that in drawing Green Belt boundaries Authorities should have regard to their permanence beyond the plan period and to promoting sustainable patterns of development. Authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt The first sentence in paragraph 83 sets out the requirement to establish green belt boundaries. Paragraphs 84 and 85 provide the policy for drawing up the green belt boundaries.
5. Purposes of the green belt are set out in the NPPF (paragraph 80), these are to:
 - check the unrestricted sprawl of large built-up areas;
 - prevent neighbouring towns merging into one another;

- assist in safeguarding the countryside from encroachment;
 - preserve the setting and special character of historic towns; and
 - assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
6. Given this policy and guidance it is important to ensure that the extent of the Green Belt takes account of the longer term development requirements of the city and at the same time ensures that it properly addresses the purposes for which it has been created.
 7. To ensure that the green belt has permanence beyond the Plan period the Local Plan has, in accordance with policy that is set out in paragraph 85 of the NPPF, identified land to be safeguarded for longer term development.
 8. It is important that the full needs for both housing and employment land during the plan period can be met without compromising the integrity of the green belt. In addition, to ensure a permanent Green Belt the levels of growth have been extrapolated forward to create a Green Belt that would endure for at least 25 years. Although it is likely that further, as yet unidentified sites (windfalls) will become available during the Local Plan period thus extending this timeframe. The work undertaken to ensure a green belt has a degree of permanence beyond the plan period, as required by paragraph 83 on NPPF, is described in more detail below.
 9. The technical work underpinning the Local Plan has established the objectively assessed need for development in the Local Authority Area. The call for sites and further work on the suitability and deliverability of sites has established the range and scale of opportunities to accommodate the objectively assessed need. It is clear that the outcome of all this work is that the accommodation of the district's development needs and the securing of a long lasting green belt boundary will require the use of land that is currently open and could otherwise be included in the green belt. The use of this land is necessary to meet the objectively assessed development needs of the district and there is not a suitable and deliverable alternative.

Safeguarded Land

10. The analysis above has demonstrated that to enable the district to accommodate its development needs land that would otherwise be included in the green belt has been allocated for development during the Plan period. In light of this there is a risk that the green belt would need to be reviewed at the end of the plan period to accommodate at least some of the development requirements in the next plan period. This would mean that the green belt proposed in the current Plan would not have the degree of permanence required by policy in the NPPF (paragraph 83). To avoid this occurring, the current Plan proposes to safeguard land for longer term development needs.
11. The identification of evidence that quantifies the longer term development pressures that would require land to be excluded from the Green Belt and safeguarded for longer term development requires careful consideration. Furthermore there is inherent uncertainty in estimating the longer term development requirements of the city. However this uncertainty is not so great that it renders the exercise impractical, we simply should recognise that the techniques used to quantify longer term development needs are not a precise science.
12. In seeking to determine the scale and pattern of longer term development pressures, three broad types can be identified; housing, employment and community facilities (schools shops health provision etc). This has been simplified using the gross calculation which is applied to housing as the large housing sites include land for the facilities required to support the community such as schools. Some safeguarded land will, because of site characteristics and surroundings, only be suitable for either housing and associated community uses; or employment. The site selection and overall amount of land identified to be safeguarded has taken account of this.
13. The Local Plan has a 15 year strategy, looking ahead a further 10 years should ensure the degree of permanence to the green belt envisaged in the NPPF. Given the uncertainty inherent in the calculations it is reasonable to take the simplified approach to arrive at a 'broad brush' conclusion. In doing this it is important to remember that the land

safeguarded for longer term development will remain open for the lifetime of the plan and possibly beyond as proposals to bring forward any safeguarded land would be subject to comprehensive testing through the Plan review process. Alternatively, not identifying any safeguarded land would undermine the credibility of the green belt as its permanence would not be secured.

Forecasting longer term development needs

14. In forecasting the longer term development needs of the district we can either extrapolate from the policy based forecasts used for the plan period or seek to derive a policy neutral forecast.
15. In the case of land for housing and associated community facilities the work undertaken by Arup has demonstrated the variability on the ONS/DCLG trend based forecasts of population and housing growth. Much of this variability arises from migration which can differ due to economic circumstances and policy changes. Given this uncertainty we are proposing to extrapolate from the policy based figure used for the Plan period.
16. This extrapolation gives a target of just over 270ha having allowed for large housing sites in the plan that will not be completely developed during the plan period and for a continuing supply of very small sites coming from within the urban area. The latter has been calculated on the basis of ten year windfall trends (2002 -2012) for the urban area relating to very small, small, medium size sites and changes of use and conversions. The large sites that contain a residual which are expected to be developed after the end of the Plan period are Whinthorpe because of the scale of the site and York Central where infrastructure constraints may not be fully resolved during the Plan period. They could potentially yield 900 and 645 dwellings respectively.
17. The forecasting of longer term job growth is even more challenging than the forecasting of housing growth. Long term economic modelling is subject to significant uncertainty. However it is clear that the continued population growth in the district will lead to a larger workforce and a consequent need for land for jobs. An extrapolation of the calculations

used for the plan period provides a start point for the need for employment land. (The Plan allocates approximately 43ha for B1 B2 and B8 uses and we have assumed that other types of employment use can be accommodated within the existing built up area) We have used a combination of this extrapolation and the identification of circumstances where established employment sites can be extended to allow for their expansion should the plan review determine that this is necessary. This combination gives a figure of 71ha of safeguarded land that could be used for employment purposes. This amount of land will ensure there is an adequate choice of sites at Plan review and it may well be that only some of the land that is safeguarded is brought forward for development at Plan review.

Choosing the sites

18. The process for choosing sites is based on the methodology applied to site choice in the plan period. However the full rigour of the selection process for sites identified for development during the plan period has not been applied to safeguarded land. This is because safeguarded land is a reserve of land that will be drawn on through plan review and any safeguarded land considered at that time for development will be subject to a full site appraisal process then.
19. The process we have used to identify safeguarded land uses the same series of primary constraints which have been applied to the selection of sites for development in the plan period. This reflects the Local Plan Spatial Strategy which aims to ensure that the following is achieved:
 - **The City's unique heritage is protected** – the involved effectively ruling out sites deemed to be in areas important to the historic character and setting of York, such as, land forming 'Green Wedges' around the historic Strays and river corridors, areas preventing coalescence of villages between themselves and to the main urban area; and areas that retain the rural setting of the city providing views of key landmarks such as the Minster.
 - **The protection of environmental assets** – The protection and management of York's Green Infrastructure is considered central to managing any future growth, whether it is publicly or

privately owned, statutory or non statutory, identified for its nature conservation or recreational value. Any sites affecting such areas were ruled out of consideration to protect environmental assets.

- **Flood risk is appropriately managed** – The geography of the city and its surroundings are such that there are significant areas at risk of flooding. Areas that are considered at high risk of flooding were ruled out.

20. The process does not use the additional filter of secondary constraints e.g. public transport accessibility that is applied to sites chosen for development in the plan period. This was not applied as these constraints may well change over the life of the plan and they will be applied at the time of plan review should the site be required to be considered for development as part of that review. Similarly the test of delivery has not included a full assessment of site viability as this may well change over the life of the plan and again would be applied at the point when the site is considered for development. Finally in considering the attributes of safeguarded land we decided that it was important to provide some flexibility in the choice of sites at the time those sites are required to be considered for development.

21. The result of this exercise is that a small number of quite extensive tracts of land have been identified which could be brought forward either in part or as a whole should they be required for development at the time of Plan review. Most of the land is found through two major extensions to the built form of the city. However three villages have also been identified as capable of supporting growth in the longer term, should this be required. In Strensall and Haxby the proposals have the potential to provide further patronage for the new railway stations. At Copmanthorpe the proposals are more modest and will have the potential to help safeguard the future of services in the village.

Sites Identified as safeguarded land

- SF1 Land south of Strensall Village 29 ha
- SF2 Land north of Clifton Moor 72 ha

- SF3 Land at Whinthorpe 174 ha
- SF4 Land north of Haxby 29 ha
- SF5 Land to west of Copmanthorpe 22 ha
- SF6 South of Airfield Business Park, Elvington 15 ha
- SF7 Land adjacent to Designer Outlet 16 ha
- SF8 Land at Northminster Business Park 40 ha

Site ref	Site name	Site area	Purpose of the site	Reasons for the choice
SF1	Land south of Strensall Village	29 ha	Land to enable choices to be made about growth and change in the village at the time of Plan review. This may well include the role of further housing provision in helping to enable enough people to live in the village to maintain the services currently offered in the village	Part of the land identified was submitted for consideration through the call for sites. The proposal was tested against the primary constraints and was found acceptable. The boundaries and overall extent of the site has been amended to create a site with clearly defined boundaries that can be considered either as a whole or in part at plan review, should it be required for development
SF2	Land north of Clifton Moor	72 ha	Further land adjacent to the proposed new settlement that will enable further	This land was not submitted through the call for sites. The site has been identified following

			growth in the longer term creating the opportunity for greater self containment of the settlement	dialogue with agents/ land owner as the most logical proposal to enable further expansion of the urban extension within clearly defined boundaries. The site as proposed does not impinge on any areas of primary constraint
SF3	Land at Whinthorpe	174 ha	Further land adjacent to the proposed new settlement that will enable further growth in the longer term creating the opportunity for greater self containment of the settlement	This majority of land was submitted for consideration through the call for sites. It provides for a logical expansion of the new settlement proposal should the need arise. The site boundaries follow clear features on the ground. The site does not impinge on any areas of primary constraint
SF4	Land north of Haxby	29 ha	Land to enable choices to be made about growth and change in the village at the time of Plan review. This may well include the role of further housing provision in helping to enable enough people to live in the village	These two related sites provide for further expansion of a proposed site to be developed in the plan period (ST9) and the opportunity to consider a further allocation east of that site should the need arise . A small part of the site was submitted in the call for sites.

			to maintain the services currently offered in the village	The site does not impinge on any areas of primary constraint
SF5	Land to west of Copmanthorpe	22 ha	Land to enable choices to be made about growth and change in the village at the time of Plan review, this may well include the role of further housing provision in helping to enable enough people to live in the village to maintain the services currently offered in the village	This land was not submitted through the call for sites. The site has been identified as the most logical proposal to enable expansion of the village, should this be required. Any proposals brought forward at Plan review will need to safeguard the adjacent site of local nature conservation significance. The site boundaries follow clear features on the ground. The site does not impinge on any areas of primary constraint
SF6	South of Airfield Business Park, Elvington	15 ha	Land to enable the further expansion of an established business park	This land was submitted for consideration through the call for sites. The site boundaries follow clear features on the ground. The site does not impinge on any areas of primary constraint
SF7	Land adjacent	16 ha	The Designer	The proposed site

	to Designer Outlet		<p>outlet is an established out of town destination. Its role may change over the life of the Plan as a consequence of innovation in the retail industry. In view of this it is prudent to safeguard land which could provide space to accommodate change</p>	<p>includes land submitted through the call for sites. It provides for a logical expansion of the development should this be required. The site does not impinge on any areas of primary constraint</p>
SF8	Land at Northminster Business Park	40 ha	<p>The business park is an established employment location that has good access to the highway network. The Plan includes proposals in the Plan period to facilitate its growth and change. There may well be need for further long term growth</p>	<p>The proposal is based on land submitted through the previous call for sites process in 2008. The site is immediately south of a new Park and Ride proposal which will form the northern boundary of the site. . The site does not impinge on any areas of primary constraint</p>