

**Gladman Hearing Statement
York Local Plan Examination**

Matter 3: Green Belt

**Principles, the Approach to Defining the Green Belt Boundaries,
Exceptional Circumstances and the Approach to
Identifying Land to be 'Released' from the Green Belt for
Development**



November 2019

PRINCIPLES

Q3.1 Paragraph 10.1 of the Plan states that “the plan creates a Green Belt for York that will provide a lasting framework to shape the future development of the city”. For the purposes of Paragraph 82 of the National Planning Policy Framework, is the Local Plan proposing to establish any new Green Belt?

b) If not, does the Local Plan propose to remove any land from the established general extent of the Green Belt? If it does, is it necessary to demonstrate that exceptional circumstances exist to warrant that approach? Or is it the case that the Local Plan establishes the Green Belt boundaries for the first time, such that the exclusion of land from the Green Belt – such as the ‘garden villages’, for example – is a matter of establishing Green Belt boundaries rather than altering them, in the terms of Paragraph 82 of the Framework?

1. It is generally accepted that the York Green Belt exists. This is confirmed through retained policies of the partially revoked Yorkshire and Humber RSS¹ and has been tested and acknowledged through the Appeals process². It is further noted that the outer boundaries of the York Green Belt are already defined in part through adopted statutory development plans of neighbouring authorities³. An important function of this Local Plan is therefore to confirm the detailed boundaries and extent of the York Green Belt within the City of York. This is confirmed by Policy Y1, C Part 1 of the Yorkshire and Humber RSS, and is responsive to national planning policy, evidence of development needs, and the authority’s environmental constraints.
2. The Council has set out the exceptional circumstances required by national planning policy to alter Green Belt boundaries in response to development needs and a general shortage of land beyond the Green Belt. Gladman support this conclusion and consider that the Council’s release and allocation of land from the Green Belt for development is sound. This is further expanded in response to Question 3.6 of the MIQs.

THE APPROACH TO DEFINING THE GREEN BELT BOUNDARIES

Q3.2 Paragraph 1.1.1 of the Council’s “Approach to defining York’s Green Belt” Topic Paper (TP1) [CD021] says “York’s Local Plan will formally define the boundary of the York Green Belt for the first time.” How has the Council approached the task of delineating the Green Belt boundaries shown on the Policies Map?

1. Generally, Gladman do not object to the approach taken by the Topic Paper to the identification of proposed inner and outer boundaries of the York Green Belt. Gladman however hold concerns regarding the robustness of the assessment of Green Belt function as provided through the Topic Paper and related evidence base. The basis for these concerns is set out more thoroughly in response to Question 3.7 of the MIQs.

¹ Policy YH9 Green Belts and Policy Y1 C Parts 1 and 2. See The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013.

² As most recently confirmed through APP/C2741/W/19/3227359 dated 23rd October 2019.

³ As identified within the adoption plans of East Riding of Yorkshire, Hambleton, Harrogate, Ryedale and Selby.

Q3.3 Will the proposed Green Belt boundaries need to be altered at the end of the Plan Period? To this end, are the boundaries clearly defined, using physical features that are readily recognisable and likely to remain permanent? What approach has the Council taken in this regard?

1. Except for allocated sites, the proposed inner boundary to the Green Belt is tightly bound to the recognised built up area of the City and its villages. In this regard the proposed inner boundary to the Green Belt is clearly defined, however as a consequence of this approach, the opportunity for further development beyond that identified through the Local Plan and windfall is limited.
2. Gladman hold no objection to proposed outer boundaries of the York Green Belt.

Q3.4 Should the Plan identify areas of “Safeguarded Land” between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period?

1. The submitted plan contains a surplus of housing land supply up to the end of the plan period in 2032/33. This surplus reduces the need for safeguarded land given that proposed allocated sites secure the longevity of Green Belt boundaries consistent with national planning policy.
2. The Council’s approach reflects an acknowledgement that the supply position of the authority in non-green belt areas is unlikely to change for the better in the near future and as such, in order to meet longer term development needs, further Green Belt land will be required.
3. The Council respond to longer term development needs through the allocation of new Garden Villages in several locations around the plan area. The Council recognise that development at these locations will take longer to come forward owing to infrastructure requirements, and as such off-set expected delivery at these sites until later in the plan period. These sites offer sustainable opportunities to meet longer term housing needs. Planning for this supply now represents a sound approach, considering added infrastructure pressures which will most likely need to be delivered in this plan period.
4. It is considered that in this way, the Local Plan is positively prepared. The Local Plan is proactive in considering its future housing need and what effect this might have for plan making and infrastructure now.

Q3.5 Overall, are the Green Belt boundaries in the plan appropriately defined and consistent with national policy in the National Planning Policy Framework, and is the Plan sound in this regard?

1. Gladman is broadly supportive of proposed inner and outer Green Belt boundaries as set out in the Local Plan.
2. The positive approach to site allocation taken by the Council through the Local Plan is beneficial in securing the deliverability of this Local Plan but also secures the longevity of the Green Belt in the longer term. The Council’s approach offers certainty, potentially delaying the need to review the Green Belt again until long after the end of the current plan period unless housing needs alter significantly.

EXCEPTIONAL CIRCUMSTANCES

Q3.6 Paragraph 83 of the National Planning Policy Framework is clear that Green Belt boundaries should only be altered in exceptional circumstances. It appears that the Plan proposes to 'release' some land from the Green Belt by altering its boundaries. In broad terms:

a) **Do the necessary exceptional circumstances exist to warrant the proposed alterations to Green Belt boundaries, in terms of removing land from the Green Belt? If so, what are they?**

1. It is considered that exceptional circumstances are present to justify proposed alterations to the Green Belt. In Gladman's view this is principally provided by the evident shortage of available and deliverable housing land supply in non-Green Belt locations to meet the housing and employment needs of the City in full.
2. The City has been successful in developing non-green belt sites to secure new housing. This has benefitted the city by regenerating many of the city's brownfield sites. Even so the level of supply delivered over this period has not been sufficient to grant the Council with a five-year land supply⁴ and the supply of housing has not been enough to respond to housing need and demand⁵.
3. The failure to meet the identified future housing needs of the City in full over the longer term is likely to result in significant harm to the sustainability of the City. The affordability ratio in York is already increasing at the highest rate in Yorkshire⁶. Affordable Housing Needs are significant at 573 dwellings per year as last evidenced, with urban supply insufficient to provide any meaningful response to this. The York housing market is already inaccessible to many households and first-time buyers. This is illustrated by significant changes to the average rental prices in the City in comparison to national and regional averages as households are forced to rent to stay in the City⁷. The social harm arising from this under delivery is incalculable and is only likely to get worse should housing delivery continue to fall behind demand and need.
4. The adverse effects of failing to meet identified needs in full is not limited to social effects, with harmful effects for the economy and environment also likely if an insufficient supply of new homes isn't provided in the right locations.
5. The release of land from within the Green Belt is responsive to this context and maximises the potential for sufficient supply to be identified and delivered in York in response to evidenced needs. It will also help grant the Council with a five-year land supply of housing land as illustrated by the supporting evidence base⁸.

⁴ The current five-year supply is at around 3.5 years as confirmed at the North of Boroughbridge Road Appeal, October 2019 (see APP/C2741/W/19/3227359).

⁵ As evidenced through Section 4 of the Housing Needs Update (EX/CYC/9).

⁶ As illustrated by Table 5c Ratio of Median House Price to Median Gross Annual Workplace-based earnings by Local Authority.

⁷ See Table 11 of the Housing Need Update (EX/CYC/9).

⁸ See Figure 6 Detailed Housing Trajectory, 2018 Strategic Housing Land Availability Assessment (SD049A).

b) What relationship, if any, is there between the exceptional circumstances leading to the alterations proposed to the Green Belt and the proposed spatial strategy/distribution of new housing?

1. The spatial strategy is considered by Gladman to be responsive to the five key principles as set out in Policy SS1 which in turn reflect the principle strategic issues, sensitivities and opportunities for the City and its future development. It is evident that the City Council has gone to great effort to maximise the supply of housing land which is provided at non-Green Belt sites. This is summarised in relation to Question 3.6 of the MIQs.
2. The balance of the supply required to meet identified needs in full is made up of sites which have been considered against the spatial principles of Policy SS1, securing a viable and deliverable supply across the authority area. The identification of sites follows a lengthy process of review by the Council balancing matters of constraint and opportunity. The result is a spatial strategy which best reflects the aims and objectives of the Local Plan. Sites identified seek to distribute supply across the local authority area, provide for a mix of housing sites in terms of scale, and ensures continuous delivery for the duration of the plan period.
3. Whilst Gladman is satisfied that the spatial pattern of development set out in the York Local Plan is in accordance with Policy SS1, Gladman is concerned that the supporting evidence to support the supply identified not robust and requires review (see Question 3.7 response).

c) What is the capacity of existing urban areas to meet the need for housing and employment sites?

1. It is clear to Gladman that the Council has sought to maximise its urban supply in line with national planning policy before turning to the Green Belt. Altogether over 60% of the proposed housing land supply to 2032/33 is located on non-Green Belt sites. This excludes the further 969 dwellings anticipated by the Council in non-Green Belt areas beyond the plan period. Collectively however it is clear that the capacity of areas outside of the Green Belt is not sufficient to secure the full and consistent delivery of the housing requirement and as such the release of land from the Green Belt is required.

d) Is there any non-Green Belt rural land which could meet all or part of the District's housing and employment needs in a sustainable manner (having regard to any other significant constraints)?

1. It is acknowledged that there is some greenfield land in York which is located within the open countryside and is not designated Green Belt. This land is however located on the periphery of the District, distant from public transport, shops and services. The allocation of residential development here would not result in a sustainable pattern of development and as such its allocation would be inconsistent with the spatial principles of the Local Plan and Paragraph 84 of the NPPF. Gladman is therefore supportive of the decision made by the Council not to direct development to this part of the District.

THE APPROACH TO IDENTIFYING LAND TO BE RELEASED FROM THE GREEN BELT FOR DEVELOPMENT

Q3.7 How has land proposed to be removed from the Green Belt been selected? Has the process of selecting the land in question been based on a robust assessment methodology that:

- a) Reflects the fundamental aim of Green Belts, being to prevent urban sprawl by keeping land permanently open;**
- b) Reflect the essential characteristics of Green Belts, being their openness and permanence;**
- c) Takes account of both the spatial and visual aspects of the openness of the Green Belt, in the light of the judgements in Turner and Samuel Smith Old Brewery;**
- d) Reflects the five purposes that the Green Belt serves, as set out in Paragraph 80 of the Framework; and**
- e) Takes account of the need to promote sustainable patterns of development?**

1. The Council's evidence in relation to the Green Belt is provided by the following documents:
 - Approach to the Green Belt Appraisal (SD107A);
 - City of York Historic Character and Setting Technical Paper 2011 (SD108);
 - City of York Historic Character and Setting Technical Paper 2013 (SD106);
 - City of York Heritage Topic Paper Update 2014 (SD103);
 - City of York Council Topic Paper Approach to Defining York's Green Belt 2018 (TP1); and
 - City of York Council Topic Paper Approach to Defining York's Green Belt Addendum 2019 (EXCYC18).
2. Gladman has long held concerns about the robustness of the assessment made by the Council of the York Green Belt and has repeatedly requested for the existing evidence base to be subject to a thorough review. Having examined the 2018 and 2019 Topic Papers, Gladman's concerns remain and as such it is considered that an independent and comprehensive assessment is required to ensure that the evidence base supporting the Local Plan is robust.
3. To demonstrate the need for this review, Gladman has commissioned Wardell Armstrong to undertake a critical review of the Council's evidence base in relation to the Green Belt. This is provided in full as Appendix 1 to this Hearing Statement with findings summarised below:
 - The 2003 Appraisal fails to provide a complete assessment of the York Green Belt against all Green Belt purposes, focussing only on purposes 2 and 4;
 - The 2011 and 2013 updates do not seek to assess the York Green Belt beyond the consideration of historical character and setting and as such do not provide for a complete Green Belt assessment;
 - Both the 2003 Appraisal and 2018 Topic Paper fail to set out what methodology was used to conduct the Green Belt assessment;
 - No scoring system is provided within the 2019 Addendum which sets out to what extent land meet each purpose, with only limited assessment provided for identified preferred sites.

4. Overall it is concluded within the Wardell Armstrong report that a full and proper appraisal the York Green Belt has not been undertaken by the Council in support of the Local Plan and is in need of full, objective standalone review. In relation to Green Belt purposes it is concluded that:
 - Purpose 1 is not fully considered given that the assessment only considers distances to services and fails to examine against the ability of Green Belt to protect land from urban sprawl and strength of existing boundaries in protecting urban sprawl;
 - Purpose 2 is not robustly considered given the absence of scoring to determine what role a site fulfils in preventing coalescence and what value there is to retaining the gaps identified. The 2019 Addendum does not review the assessment made of this purpose as originally undertaken through the 2003 Appraisal; and
 - Purpose 3 is not fully considered given that land not formally designated or defined has not been assessed. Consideration would normally be given to the existing impact of encroachment on the land – i.e. the character of the site and impact of surrounding influences.
5. Based on the above, Gladman cannot support the findings of the Addendum Topic Paper (EX/CYC/18) of Green Belt functionality as summarised and illustrated through Figure 7 of the report. Gladman do not believe that this represents a robust position and consider that new evidence is required.
6. Notwithstanding the above concerns, Gladman is largely satisfied that the sites identified as allocations within the Local Plan do not fulfil a strong Green Belt function and as such do not need to be kept permanently open from development.
7. This includes Gladman's land interest at ST31. Responding to Question 3.7 parts A to E of the MIQs it is concluded that:
 - The allocation of the Site prevents urban sprawl given that it is contained by permanent and prominent infrastructure/uses on all sides which is not easily crossed by development and already forms the extent of wider settlement boundaries to the village of Copmanthorpe;
 - The broad open landscape to the east of the East Coast Mainline will remain untouched by development. The East Coast Mainline provides a distinct and permanent boundary and forms the boundary to the wider settlement. Opportunity exists for landscaping and boundary planting along the eastern boundary of the Site to soften the effects of development. There are no other long-distance views out of/into the Site;
 - The Site is subject to a degree of openness owing to its current use for agriculture. Surrounding development and uses however reduce the tranquillity of the Site with frequent passing trains, and traffic using the A64 and Tadcaster Road, and prominent residential development along the south east boundary. These uses mean that the Site does not display the distinct open and rural feel as displayed by wider open countryside which is located to the east of the railway line;
 - Gladman do not consider that the Site fulfils a role against any of the five purposes of the Green Belt and as such does not need to be kept permanently open and disagrees with the assessment made by the Council. Nevertheless, to maximise the physical gap

between York and Copmanthorpe, land is to remain open in the north east of the Site. This is shown on the policies map; and

- The Site is located on the route of the half hourly 13-bus service from Haxby via York to Copmanthorpe and the half hourly 840 Coastliner Bus Service from Leeds to the East Coast via York City Centre. These services combine to create a high-quality public transport corridor into York along Tadcaster Road which is further supplemented by Park and Ride services which is also within walking distance of the Site. The Site also benefits from cycle links into York City Centre and is within walking distance of services and amenities available within Copmanthorpe, the Tesco Superstore at Askham Bar, and York College. The Site is therefore readily accessible.
8. Further discussion and detail in relation to ST31 will provided in relation to the site-specific hearings when arranged.

Q3.8 Have the Green Belt boundaries – as proposed to be altered – been considered having regard to their intended permanence in the long term? Are they capable of enduring beyond the plan period?

1. Gladman is generally satisfied that the proposed boundaries of identified Sites within the submitted Local Plan promote the permanence of the Green Belt, maintain the openness of the Green Belt, and safeguard it from further development.
2. One of the best examples of this is provided by Gladman’s land interest at Site ST31. The physical aspects of the Site and its relationship to its surroundings is described in brief above in response to Q3.7 and will be covered in greater detail at later hearings dealing with specific sites.

Q3.10 Overall, is the approach to identifying land to be released from the Green Belt robust, and is the Plan sound in this regard?

1. Sites identified for release from the Green Belt and allocation for development through the Local Plan as submitted are consistent with national planning policy in relation to Green Belt. This includes Gladman’s land interest at ST31.
2. There are however clear issues with the robustness of supporting evidence. The submitted Wardell Armstrong report concludes:
 - The evidence base Lacks transparency and consistency in identifying how land has been assessed and how judgements have been arrived at (for example the absence of scoring);
 - Fails to fully consider all issues which influence each Green Belt purpose; and
 - Not all Green Belt purposes of the national planning policy have been subject to full assessment meaning that the review undertaken is incomplete.
3. As a result, the conclusions of the Council’s Green Belt assessment are flawed. A full review of Green Belt evidence is therefore necessary to ensure that the Local Plan is justified and consistent with national planning policy.

Appendix 1:

City of York Green Belt Critical Review

Wardell Armstrong (November 2019)

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GLADMAN DEVELOPMENTS

CITY OF YORK GREEN BELT

CRITICAL REVIEW

NOVEMBER 2019

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CITY OF YORK GREEN BELT

CRITICAL REVIEW

NOVEMBER 2019

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EXECUTIVE SUMMARY

Wardell Armstrong LLP has been commissioned on behalf of Gladman Developments to undertake a critical review of the City of York's current Green Belt evidence base, in particular the Green Belt appraisals which have been undertaken by City of York Council.

The York Green Belt has a long and complicated history. The primary purpose of the Green Belt is to preserve the historic character and setting of York, and extensive work has been undertaken to determine the most valuable areas in meeting this purpose, including the 2003 Local Green Belt Appraisal and 2011 and 2013 Historic Character and Setting Technical Papers.

However, an assessment of the Green Belt as a whole, considering all five purposes as defined by the NPPF, was not undertaken until production of the 2018 Topic Paper (TP1): Approach to Defining York's Green Belt. This document also defined the inner and outer boundaries of York Green Belt for the first time. An Addendum to TP1 was published in March 2019, providing further detailed information about the approach taken to the assessment of the York Green Belt within the context of the Local Plan process.

It is considered that the approach taken to the identification of strategic areas to keep permanently open is not robust. The methodology assumes that any land which meets at least one purpose should be designated as Green Belt and no scoring system is applied, so it is subjective in that it is not possible to determine the extent to which land meets each purpose. In addition, it is not considered that an appropriate or sufficient assessment of Green Belt land against Purposes 1 or 3 has been undertaken.

Exceptional circumstances, requiring the release of Green Belt land for development, have been demonstrated. However, it is not clear how sites within the Green Belt have been assessed in relation to their harm to Green Belt purposes.

It does not appear that a consistent and clearly defined approach, informed by best practice, has been established and used to assess the impact of development sites on the Green Belt. It is considered that the most comprehensive approach to this would be to undertake a full, objective standalone review of the Green Belt, based on best practice, for example in line with the approach utilised by Selby District to ensure consistency across the neighbouring authorities.

1 INTRODUCTION

1.1 Context

1.1.1 Wardell Armstrong has been commissioned on behalf of Gladman Developments to undertake a critical review of the City of York's current Green Belt evidence base, in particular the Green Belt appraisals which have been undertaken by City of York Council (CYC).

1.1.2 The following documents have been considered within this review:

- Local Plan Green Belt Appraisal (City of York, February 2003);
- Historic Character and Setting Technical Paper (City of York, January 2011);
- Historic Character and Setting Technical Paper Update (City of York, June 2013);
- Local Plan Topic Paper Approach to Defining York's Green Belt (City of York, May 2018); and
- Local Plan Topic Paper Approach to Defining York's Green Belt Addendum (City of York, March 2019).

1.2 Background

1.2.1 Proposals for the York Green Belt were first created in 1956, and a draft 'sketch plan' was produced which informed interim policy. The York Green Belt was first formally created within the North Yorkshire County Structure Plan in 1980 which set the principle of a York Green Belt defined as: "*a belt whose outer edge is about 6 miles from York City centre*". Although the 'sketch plan' was still utilised by the County Council, the Structure Plan did not adopt detailed Green Belt boundaries.

1.2.2 Due to the potential extent of York Green Belt across multiple planning authorities, it was decided that the Greater York Authorities would work together to create a Greater York Local Plan. North Yorkshire County Council published the Deposit Draft 'York Green Belt Local Plan' in 1991. However, this was not formally adopted due to revisions to government guidance on Green Belt; changes to development proposals; and local government re-organisation. As such, the detailed Green Belt boundaries remained unadopted.

1.2.3 CYC published the 2003 Green Belt Appraisal in support of the emerging City of York Local Plan. The 2003 Appraisal assessed the existing draft Green Belt to identify areas

of land most valuable in Green Belt terms. The report focused on the historic character and setting of York, as the primary purpose of the York Green Belt, and identified the most valuable areas of Green Belt on this basis.

- 1.2.4 The principle and general extent of York's Green Belt was set out within the Yorkshire and Humber Regional Spatial Strategy (RSS) in 2008. The RSS defined the broad extent of the York Green Belt as about 6 miles from York city centre. The RSS acknowledged that the detailed inner boundary to the York Green Belt, and parts of the outer boundary, have not been designated in a development plan. Policies YH9 and Y1 of the RSS stated that the detailed inner boundaries, and outstanding outer boundaries, of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city.
- 1.2.5 In 2011, CYC produced the Historic Character and Setting Technical Paper to support the Spatial Strategy section of the emerging Local Development Framework Core Strategy, in terms of the historic character and setting of the Green Belt. The paper reviewed and amended the Historic Character and Setting Areas identified within the 2003 Appraisal.
- 1.2.6 CYC produced an update to the 2011 Technical Paper in June 2013, to support the Preferred Options Local Plan. The paper again reviewed and amended the Historic Character and Setting Areas, taking into consideration potential development sites proposed during a 'Call for Sites' exercise.
- 1.2.7 The Topic Paper (TP1) Approach to Defining York's Green Belt was produced in May 2018, to support the new Local Plan in formally defining the boundary of the York Green Belt for the first time. TP1 set out how the site selection work for the new Local Plan had taken consideration of Green Belt purposes into account.
- 1.2.8 An Addendum to TP1 was published in March 2019, providing further detailed information about the approach taken to the assessment of the York Green Belt within the context of the Local Plan process.

1.3 Report Structure

- 1.3.1 This report has been set out in a number of sections, as follows:

1. Introduction: Context of the report and background to the York City Council Green Belt;

2. Planning Policy and Guidance: a summary of national and local planning policy and guidance of relevance to this review;
3. Review of City of York Green Belt evidence base; and
4. Summary.

2 PLANNING POLICY AND GUIDANCE

2.1 National Planning Policy

2.1.1 The National Planning Policy Framework (NPPF) was introduced in 2012, with the aim of simplifying the planning process. The revised NPPF was published in July 2018, replacing the 2012 NPPF, and was subsequently updated in February 2019. However, under transitional arrangements the York Local Plan is being prepared in accordance with the 2012 NPPF, and therefore the following section relates to Green Belt policy within the 2012 NPPF.

2.1.2 In regard to the importance of the Green Belt, the 2012 NPPF states that:

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

(NPPF, paragraph 79)

2.1.3 The 2012 NPPF states that the Green Belt serves five purposes, which are:

- *“to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

(NPPF, paragraph 80)

2.1.4 In relation to Green Belt boundaries, the 2012 NPPF states that:

“Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

(NPPF, paragraph 83)

2.1.5 The 2012 NPPF states that:

“When defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

(NPPF, paragraph 85)

2.1.6 In regard to development within the Green Belt, the NPPF states that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”* (NPPF, paragraph 87).

2.1.7 When considering planning applications, the NPPF states that:

“local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”

(NPPF, paragraph 88)

2.2 Local Planning Policy

Current Local Plan

2.2.1 CYC does not currently have a formally adopted Local Plan. The current Local Plan comprises the ‘Draft Local Plan Incorporating the 4th set of changes’ and was approved

for development management purposes in 2005. This Plan is clearly out-of-date in the context of NPPF compliance, as confirmed in recent appeal decisions.

- 2.2.2 Current Green Belt policy is set out within saved policies of the 2008 Yorkshire and Humber Regional Spatial Strategy (RSS). The RSS defined the broad extent of the York Green Belt as about 6 miles from York city centre. Policies YH9 and Y1 of the RSS stated that the detailed inner boundaries, and outstanding outer boundaries, of the Green Belt around York should be defined in order to establish long term development limits that safeguard the special character and setting of the historic city.

Emerging Local Plan

- 2.2.3 CYC are currently preparing a new Local Plan for formal adoption in accordance with the NPPF.
- 2.2.4 The February 2019 Publication Draft for the new Local Plan states that the plan will cover the period from 2017 to 2032/33, with the exception of the Green Belt boundaries which will endure up to 2037/38.
- 2.2.5 It is stated that within the Local Plan the Green Belt's primary purpose is that of preserving the setting and special character of York.
- 2.2.6 The Local Plan acknowledges other Green Belt purposes within the following statement *"Over and above the areas identified as being important in terms of the historic character and setting of York other land is included to regulate the form and growth of the city and other settlements in a sustainable way. This land will perform the role of checking the sprawl; safeguarding the countryside from encroachment; and encouraging the recycling of derelict and other urban land."*

2.3 Guidance

- 2.3.1 There is no national guidance which definitively sets out how an assessment of Green Belt should be undertaken. Methodologies utilised in Green Belt assessments are generally informed by previous best practice, neighbouring examples and guidance provided by the Planning Advisory Service (PAS), as set out below.

Planning on the Doorstep: The Big Issues – Green Belt

- 2.3.2 The PAS published guidance on Green Belt assessment in 2015, entitled "Planning on the Doorstep: The Big Issues – Green Belt". The guidance states that *"The most immediate issue for the Green Belt is the maintenance of the purposes of the Green Belt set against the under-provision of housing across many parts of the country,*

where the capacity to accommodate sustainable development in urban areas is often insufficient to meet the housing requirement.”

2.3.3 In regards to current practice, the guidance states that *“Whilst the landscape around a town may be of high value, for instance, and may benefit from the restriction on development afforded by Green Belt policy, the conservation of that quality cannot be a reason to designate the area as Green Belt. The strict application of the Green Belt purposes would also mean, therefore, that the quality of the landscape of an area should not be a consideration when assessing the contribution of Green Belt to the fulfilment of Green Belt purposes. This could be a planning consideration in its own right when seeking a suitable location for development.”*

2.3.4 The guidance outlines the positive and negative case for Green Belt, discussing within the negative case how sustainable development is restricted by an arbitrary limit to growth, and acknowledges that *“Most Green Belt was established in the 1950s and has not been objectively reviewed since.”*

2.3.5 The guidance discusses the five NPPF purposes, and their application when reviewing Green Belt.

1. to check the unrestricted sprawl of large built-up areas:

The guidance notes that the terminology ‘sprawl’ comes from the 1930s when the Green Belt was conceived, and queries whether well designed, positively planned development is ‘sprawl’.

2. to prevent neighbouring towns merging into one another:

The guidance states that a ‘scale rule’ approach should be avoided, as the *“identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land in between must be taken into account.”*

3. to assist in safeguarding the countryside from encroachment:

The guidance acknowledges that all Green Belt must do this to some extent, which makes it difficult when evaluating the contribution different areas of land within a Green Belt review. The guidance therefore states that *“The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter*

in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.”

4. to preserve the setting and special character of historic towns:

The guidance states that it is generally accepted that this purpose relates to very few settlements in practice, as there are usually more recent developments between the historic core of towns and the wider countryside.

5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land:

Similar to the third purpose, the guidance acknowledges that all Green Belt must do this. However, the guidance just states that *“the value of various land parcels is unlikely to be distinguished by the application of this purpose”* and provides no further guidance on the application.

Neighbouring Green Belt Assessments

- 2.3.6 The general extent of York Green Belt reaches beyond the limit of CYC’s administrative area to neighbouring authorities. Of the neighbouring authorities, only Selby District Council (SDC) has undertaken a Green Belt Review.

Selby District Stage 1 Green Belt Study

- 2.3.7 In 2015 SDC published ‘A Study of Green Belt, Strategic Countryside Gaps, Safeguarded Land and Development Limits: Stage 1 Green Belt Study’. This study was undertaken by Arup on behalf of SDC and formed part of the evidence base for the emerging Local Plan. The purpose of the Study was to identify land suitable for release from the Green Belt based on the extent to which it fulfils the five purposes of the Green Belt and the strength of the resultant Green Belt boundary.
- 2.3.8 The report specifically provided the Stage 1 element of the Green Belt Study, which included the definition of a methodology for Green Belt Study and an objective and independent assessment of all Green Belt land within Selby District against the NPPF purposes.
- 2.3.9 Based on a summary of the PAS guidance, Inspector’s Reports and Recent Appeal Cases highlights it was concluded that Green Belt Reviews should be undertaken strategically and comprehensively. The report states:

“Initial conclusions from the Inspector’s November 2012 Report into the Bath and North East Somerset Local Plan also found that in the absence of a

comprehensive review of the Green Belt, it was difficult to agree with Council conclusions on future growth. Therefore the 'start point' point for the Study was to consider all Green Belt land within Selby District."

- 2.3.10 Existing 'Major Developed Sites' washed-over by Green Belt and allocated areas of Safeguarded Land defined within the Local Plan 2005 were treated as Green Belt to ensure a comprehensive assessment of the Green Belt designation.
- 2.3.11 'Local Interpretations' of the five purposes of the Green Belt were defined based on a review of PAS guidance, recently adopted Local Plans and recently completed Green Belt Reviews. Assessment criteria was produced for each purpose, with a scoring system of 1 to 5 used to identify the extent to which an area of Green Belt met each purpose. All Purposes were considered equally with no weighting or aggregation of scores across Purposes.
- 2.3.12 A Review Panel Workshop was held to discuss the approach to the Study with neighbouring authorities, agree the interpretation of the five Purposes of the Green Belt and discuss Duty to Cooperate principles.
- 2.3.13 The Green Belt within Selby District was sub-divided into 44 General Areas which were then assessed against the five purposes of the Green Belt. These General Areas were defined based on permanent and defensible 'strategic' boundary features. The General Areas were assessed at a strategic level, allowing for differentiation of the extent to which each area is fulfilling the purposes of the Green Belt.
- 2.3.14 The study concluded that all of the General Areas have a role in fulfilling at least one of the five purposes of the Green Belt to varying degrees with the majority performing strongest on Purpose 3.
- 2.3.15 It was proposed that General Areas identified during Stage 1 would then be assessed in more detail during Stages 2 and 3. However, during the Local Plan process it was determined that exceptional circumstances did not exist to justify any amendments to the Green Belt and therefore no further review is currently required.

3 REVIEW OF YORK GREEN BELT APPRAISALS

3.1 Introduction

3.1.1 The following section sets out a review of the key documents of relevance to the Green Belt within the CYC's current evidence base.

3.2 2003 Green Belt Appraisal

3.2.1 CYC published the 2003 Green Belt Appraisal in support of the emerging City of York Local Plan. The 2003 Appraisal assessed the existing draft Green Belt to identify areas of land most valuable in Green Belt terms. The report focused on the historic character and setting of York, stating that this was considered to be the most important purpose of the Green Belt in relation to York.

3.2.2 The 2003 Appraisal identified four categories of land to identify the most valuable areas of Green Belt. Three of these related to the historic character and setting of York, and the fourth related to the prevention of coalescence between settlements. The four categories were as follows:

1. Areas which retain, reinforce and extend the pattern of historic green wedges.
2. Areas which provide an impression of a historic city situated within a rural setting.
3. The setting of villages whose traditional form, character and relationship with the surrounding agricultural landscape of which is substantially unchanged.
4. Areas which prevent the coalescence of settlements to retain their individual identity.

3.2.3 Areas identified under the first category were broken down further into the following sub-categories:

- The Strays: Remaining areas of common land with historical associations of public land use;
- The 'ings': Water hay meadows on the river floodplains of the Ouse providing historical continuity of land use;
- Green Wedges: Broad areas of undeveloped land extending up to the ring road; and
- Extensions to Green Wedges: Areas of undeveloped land situated outside of the ring road, connected to the Green Wedges.

3.2.4 As such, the 2003 Appraisal focused primarily on Purpose 4 of the Green Belt. Consideration is given to Purpose 2 through the identification of areas which prevent the coalescence of settlements. The 2003 Appraisal designates undeveloped land between villages as being valuable in relation to this purpose. However, no assessment is made of the extent to which different areas contribute to preventing coalescence. The designation is drawn to the edge of the built-up area, and consideration is not given to permanent features such as highways or waterbodies which may provide a strong limit to development, thereby preventing coalescence.

3.2.5 The 2003 Appraisal did not assess the Green Belt against Purposes 1, 3 or 5, or identify the detailed boundaries of the Green Belt.

3.3 2011 Historic Character and Setting Technical Paper & 2013 Update

3.3.1 In 2011, CYC produced the Historic Character and Setting Technical Paper to support the Spatial Strategy section of the emerging Local Development Framework (LDF) Core Strategy, in terms of the historic character and setting of the Green Belt. The paper reviewed and amended the Historic Character and Setting Areas identified within the 2003 Appraisal, taking into account issues raised on historic character and setting designations as part of the consultation on the Core Strategy and Allocations DPD.

3.3.2 This included the 'LDF Submission Including Review of Fulford's Green Belt Land' undertaken by Fulford Parish Council (FPC). FPC considered that within the 2003 Appraisal "*certain areas of Fulford Parish have either been incorrectly assessed against these criteria, or not assessed at all*" and made several requests for amendments.

3.3.3 CYC produced an update to the 2011 Technical Paper in June 2013, to support the Preferred Options Local Plan. The paper again reviewed and amended the Historic Character and Setting Areas, taking into consideration potential development sites proposed during a 'Call for Sites' exercise.

3.3.4 The 2011 and 2013 papers did not identify the detailed boundaries of the Green Belt or assess the Green Belt beyond consideration of historical character and setting.

3.4 2018 Topic Paper (TP1) Approach to Defining York's Green Belt & 2019 Addendum

3.4.1 As set out above, prior to the production of TP1, an objective assessment of York's Green Belt against all five Green Belt purposes had not been undertaken. Earlier work had focused primarily on the historic character and setting of York, and the most valuable areas of the Green Belt in fulfilling this purpose. Consideration was also given

to the prevention of coalescence between towns and villages. However, the wider Green Belt was not considered against the five purposes.

3.4.2 The new Local Plan identified the boundaries of York's Green Belt for the first time, and TP1 set out the broad approach taken to this. However, it is not clear within TP1 how the boundaries were defined, and what methodology was used. The TP1 Addendum provides further detail on the methodology utilised, the evidence base and the results of the assessment.

3.4.3 The TP1 Addendum:

- Sets out the strategic approach to identifying land which needs to be kept permanently open in the context of the five purposes of Green Belt;
- explains how and where detailed inner and outer Green Belt Boundaries have been defined through the Local Plan;
- explains the approach to urban areas in the Green Belt;
- explains why exceptional circumstances exist to justify alterations to the general extent of the Green Belt, in order to bring forward strategic sites to meet development needs; and
- sets out how strategic sites in the general extent of Green Belt have been selected and boundaries established.

Strategic Approach

3.4.4 Section 4 of the TP1 Addendum details the strategic approach taken to the identification of Green Belt land within the Local Plan process. This section sets out how land which needs to be kept permanently open in the context of the five purposes of Green Belt has been identified and sets the context for defining detailed Green Belt boundaries.

3.4.5 No scoring system has been applied to assess the extent to which land meets each purpose, instead a simple pass or fail approach is used. Mapping is used to illustrate whether land meets a purpose or not, based on the criteria set out below.

Purpose 1: To check the unrestricted sprawl of large built-up areas

3.4.6 TP1 assesses whether land meets Purpose 1, checking unrestricted sprawl of large built up areas, on the basis of whether the land has access to two or more services

within 800m. This is considered to be a simplistic approach which does not fully consider this purpose.

- 3.4.7 The PAS Guidance acknowledges *“that to justify the use of land in the Green Belt for development through the local plan, an assessment needs to take account of sustainability issues - such as accessibility and environmental assets - and an assessment against Green Belt purposes to be combined with a comprehensive assessment according to other issues”*. However, it is not considered that Purpose 1 can be assessed purely on access to services. The PAS Guidance states that sustainability should be considered in combination with an assessment of Green Belt purposes, rather than to assess a specific purpose.
- 3.4.8 Based on best practice within other Green Belt reviews, Purpose 1 is usually assessed against the ability of the Green Belt to protect land surrounding large built up areas; and the strength of the existing boundary in preventing sprawl. An assessment of these aspects does not appear to have been undertaken.
- 3.4.9 On the basis of the above, it is not considered that the contribution of York’s Green Belt to Purpose 1 has been fully considered.

Purpose 2: To prevent neighbouring towns from merging into one another

- 3.4.10 TP1 assesses whether land meets Purpose 2, preventing neighbouring towns merging into one another, through the identification of areas essential for preventing coalescence set out within the 2003 Appraisal, and subsequent Historic Character and Setting Technical Papers. An update to this assessment does not appear to have been undertaken within TP1 and as such no judgement has been made as to the value of different areas of land in preventing coalescence.
- 3.4.11 The PAS Guidance states that ‘a scale rule’ approach should not be applied as the identity of a settlement is not determined just by the distance to another settlement. Based on best practice within other Green Belt reviews, an assessment against Purpose 2 usually considers the significance of gaps between settlements and the role of the Green Belt designation in preventing coalescence.
- 3.4.12 The approach within the 2003 Appraisal and TP1 does not consider whether there is scope for some development within a gap, nor does it use a scoring system to identify the areas most essential in preventing coalescence. Undertaking this assessment at a strategic level would enable development to be targeted in areas which would have little or no impact on the overall purpose of the Green Belt in preventing coalescence.

3.4.13 As TP1 does not use scoring, a judgement has not been made as to the value of land in preventing coalescence, and how essential different gaps between towns are.

Purpose 3: To assist in safeguarding the countryside from encroachment

3.4.14 TP1 assesses whether land meets Purpose 3, safeguarding the countryside from encroachment, on the basis of whether the land comprises a Nature Conservation Site; existing open space, green infrastructure corridor or ancient woodland.

3.4.15 This approach identifies recognisable features of countryside, which it is important to keep open, but does not evaluate the contribution of land outside of these areas in safeguarding the countryside from encroachment. Based on best practice within other Green Belt reviews, consideration would usually be given to the existing impact of encroachment on land, i.e. whether land is rural and relatively unspoilt, or whether land has an urban character influenced by adjacent built development.

3.4.16 On the basis of the above, it is not considered that the contribution of York's Green Belt to Purpose 3 has been fully considered.

Purpose 4: To preserve the setting and special character of historic towns

3.4.17 This is stated to be the primary purpose of the York Green Belt. TP1 identifies land within the areas identified by the 2003 Appraisal, and Historic Character and Setting updates, as meeting this purpose. There is extensive evidence and research in relation to this purpose.

Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land

3.4.18 TP1 assumes that all Green Belt land meets this purpose to some extent, which is in line with the PAS Guidance. However, the new Local Plan prioritises the development of brownfield land first where possible.

3.4.19 As TP1 does not use scoring, a judgement has not been made as to whether some areas of the Green Belt, e.g. land adjacent to a key regeneration area, contribute to this purpose more than other areas.

Summary

3.4.20 The outcome of the section is the identification of strategic areas to keep permanently open, through the combination of the mapping detailing the evidence used in support of Purposes 1 to 5. However, this approach appears to assume that any land which meets at least one purpose should be designated as Green Belt.

- 3.4.21 As no scoring system has been applied to assess the extent to which land meets each purpose, it is possible that land which only makes a weak contribution to one or two purposes has been identified as Green Belt land.
- 3.4.22 It is not considered that an appropriate or robust assessment of Green Belt land against Purposes 1 or 3 has been undertaken. In addition, the assessments against Purposes 2 and 5 should be justified by a scoring system.
- 3.4.23 **Overall, it is considered that simplistic criteria have been used to assess the Green Belt**, likely exacerbated by the application of various assessments within the Local Plan evidence base rather than a dedicated, standalone Green Belt Assessment based on best practice. The criteria used does not enable a full and robust assessment against the five purposes of Green Belt as set out within the NPPF.

Identification of Boundaries

- 3.4.24 Section 5 of the TP1 Addendum sets out the methodology for defining the inner and outer boundaries of the York Green Belt. The scope of boundary considerations comprised outer boundaries which had not yet been defined by an adjoining authority; inner boundaries on the built up edge of York; and inner boundaries on the built up edge of urban areas to be inset from the Green Belt.
- 3.4.25 The following criteria was used to identify the detailed boundaries:

Openness Criteria

1. Strategic Assessment - Does the boundary mark the edge of broad areas of land identified to be kept permanently open
2. Local Assessment - does the boundary mark the edge of land locally identified to be kept permanently open as
 - a) Protecting local historic assets
 - b) Protecting land which is open and serves a countryside function on the urban fringe through

Permanence Criteria

1. Does the boundary offer recognisability?
2. Does the boundary offer permanence?
3. Does the boundary offer strength?

3.4.26 Within the openness criteria, the strategic assessment utilised the same criteria as the strategic assessment of the wider Green Belt, which it is not considered fully considers the Green Belt purposes, as set out above.

3.4.27 The permanence criteria used is in accordance with the NPPF.

Urban Areas in the General Extent of the Green Belt

3.4.28 Section 6 of the TP1 Addendum describes the approach to identifying and assessing existing urban areas within the Green Belt and defining the detailed boundary of those to be inset.

3.4.29 In accordance with the NPPF, the open character of urban areas and their contribution to the openness of the Green Belt was assessed.

3.4.30 The criteria used to define the boundaries of the inset urban areas is consistent with the methodology used to define the inner boundary of the main urban area of York.

Exceptional Circumstances

3.4.31 Section 7 of the TP1 Addendum details the City of York's development needs, concluding that *"it would not be possible to meet the housing needs, employment land requirements, gypsy and traveller and travelling showpeople housing needs and educational needs in York across the Plan period without releasing land from the Green Belt."*

3.4.32 The TP1 Addendum states that:

"In the absence of specific guidance in the NPPF (2012) on removing land from the general extent of the green belt in circumstances where the inner and outer boundaries are yet to be defined, the Council has taken a robust approach. Sites have been allocated within the general extent of Green Belt where exceptional circumstances justify this."

Development Sites in the Green Belt

3.4.33 Section 8 of the TP1 Addendum sets out how potential development sites within the Green Belt have been identified, through review of the Site Selection process, Sustainability Appraisal and Heritage Impact Appraisal.

3.4.34 The sites proposed for removal from the Green Belt are listed and assessed against Green Belt purposes as well as the wider implications for sustainable development. Annex 5 includes the assessment of each site against the Green Belt purposes, with a

level of harm identified against each purpose. However, **it is not clear what criteria have been used to assess the sites**. Section 8 simply states that an appraisal has been undertaken of *“the impact of a potential sites against evidence defining the 5 purposes of green belt (presented in various stages of Local Plan consultation)”*.

- 3.4.35 It is not clear how the levels on harm to each purpose have been identified. For some sites, the criteria of ‘access to two or more services’ has been applied to assess harm to Purpose 1, whereas for other sites the judgement against Purpose 1 is based on the Heritage Impact Appraisal. For a number of sites, the statement is made that *“development could not reasonably be described as contributing to the unrestricted sprawl of a large built up area”* however no further justification for this is provided.
- 3.4.36 **It does not appear that a consistent and clearly defined approach, informed by best practice, has been established and used to assess the impact of each development site on the Green Belt.**
- 3.4.37 It is considered that a robust approach to Green Belt review, based on best practice, was utilised by within Selby District. Due to the nature of the Green Belt extending beyond CYC’s boundaries it is important the approach to Green Belt review is consistent across the neighbouring authorities. As such a full review, undertaken in line with the approach taken by SDC, would establish the current state of York’s Green Belt at a strategic level, using a robust methodology. This review could then form the basis for more detailed, site level assessments.

4 SUMMARY

- 4.1.1 The York Green Belt has a long and complicated history. The primary purpose of the Green Belt is to preserve the historic character and setting of York, and extensive work has been undertaken to determine the most valuable areas in meeting this purpose. However, an assessment of the Green Belt as a whole, considering all five purposes, was not undertaken until production of the 2018 Topic Paper.
- 4.1.2 It is considered that the approach taken to the identification of strategic areas to keep permanently open is not robust. The methodology assumes that any land which meets at least one purpose should be designated as Green Belt and no scoring system is applied, so it is not possible to determine the extent to which land meets each purpose. In addition, it is not considered that an appropriate or sufficient assessment of Green Belt land against Purposes 1 or 3 has been undertaken.
- 4.1.3 Exceptional circumstances, requiring the release of Green Belt land for development, have been demonstrated. However, it is not clear how sites within the Green Belt have been assessed in relation to their harm to Green Belt purposes.
- 4.1.4 It does not appear that a consistent and clearly defined approach, informed by best practice, has been established and used to assess the impact of development sites on the Green Belt. It is considered that the most comprehensive approach to this would be to undertake a full, objective standalone review of the Green Belt, based on best practice, in line with the approach utilised by the neighbouring SDC to ensure consistency across the neighbouring authorities.

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