



**EXAMINATION OF THE CITY OF YORK LOCAL PLAN
2017-2033**

PHASE 1 HEARINGS

MATTER 3: Green Belt

**The approach to identifying land to be 'released' from
the Green Belt for development
QUESTION 3.7F Addendum**

CITY OF YORK COUNCIL STATEMENT

The approach to identifying land to be ‘released’ from the Green Belt for development

3.7 How has the 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:

f) Takes account of the need to promote sustainable patterns of development? (For sites to be released from the Green Belt)

- 3.7.22 The Local Plan allocates sufficient sites to meet its objectively assessed housing and employment needs and takes a balanced approach to the social, economic and environmental principles seeking to plan positively for growth and deliver sustainable patterns of development. By doing this it seeks to avoid an increase in unsustainable commuting patterns identified through the SHMA [SD050], as a result of an undersupply of homes within the City of York authority area. Although some of the city’s needs can be accommodated within the urban area, the release of sites within the general extent of the York Green Belt is considered the most sustainable approach to meeting development needs overall.
- 3.7.23 The process of selecting sites to remove from the general extent of the green belt, in a way which supports sustainable patterns of development, is embedded throughout the Local Plan and its evidence base documents. The process derives from using the 5 spatial principles set out in Policy SS1 ‘Delivering Sustainable Growth for York’, which seeks to avoid areas which are required to be kept permanently open and to accessible location (section 3, CD001). The spatial principles draw upon the evidence base to use York’s environmental factors and sustainability considerations to locate development in the most suitable areas.
- 3.7.24 Each of the spatial principles set out in policy SS1 has a spatial expression specific to York, as reflected in the evidence base presented in para 3.4 to 3.12 (and Figures 3.1 to 3.3) of the Publication Draft Local Plan [CD001]. The application of the spatial principles to site selection and allocation gives detailed expression of the spatial strategy. This directs the pattern of development away from areas which need to be kept permanently open and to areas with access to, or the ability to create the necessary transport, services and facilities to align with the Plan’s vision.
- 3.7.25 The sustainability appraisal has been used to address the issue of promoting sustainable patterns of development, by testing the spatial strategy, policies and site allocations against identified sustainability objectives. Table 4.3 of the Local Plan Preferred Options SA [SD007a] presents the preferred spatial

strategy and reasonable alternatives. Paragraphs 4.3.15 to 4.3.22 of the report [SD007a] present a summary of the findings with the detailed appraisal contained in Appendix 6 [SD007c]. The preferred spatial strategy has then been brought forward (with refinement) for each subsequent stage of the plan. With regard to the factors that shape growth, four alternatives were considered and appraised before the preferred option of taking a balanced approach to the identified spatial principles was taken forward. This continued to use spatial shapers reflected in the spatial principles of SS1, to ensure that York's growth was allocated in a way that: recognises character and setting of York including the role of centres and the relationship between York and its surrounding settlements; conserves and enhances York's special historic and natural environment; protects York's Green Infrastructure; minimises flood risk.; and locates development in sustainable locations. These factors along with the evidence base were used to develop the options for the spatial distribution of growth considered in the Local Plan Preferred Options SA [SD007a], which identified amongst alternatives the preferred option of prioritising development within and/or as an extension to the urban area and through new settlement provision. Paragraphs 4.3.15 to 4.3.22 of the report [SD007a] present a summary of the findings with the detailed appraisal contained in Appendix 6 [SD007c].

- 3.7.25 The preferred spatial strategy has then been brought forward for each subsequent stage of the plan. Section 2 of the SA Publication Draft Regulation 19 Consultation [CD008] and specifically Tables 2.2, 2.3, 2.4, and 2.13 summarise the approach, appraisal and consultation responses. Predominantly, the sites comprising the original preferred spatial strategy (2013) remain but some have been changed or removed following consultation in 2016 on preferred sites [SD018] and 2017 (on the Pre-Publication Draft [SD021]) and to reflect that some sites have been consented for development or built out. Notably, the site allocation boundaries fundamental to delivering the spatial strategy have evolved over time, principally to respond to site specific evidence and to help to safeguard the size and compact nature of the historic city. The overall spatial strategy presented in the Local Plan Publication Draft is further refined and evolved taking into account site information. Paragraphs 6.5.2 to 6.5.4 of the SA Publication Draft Regulation 19 Consultation [CD008] notes that whilst the policies have been updated to reflect new evidence and consultation response, the thrust of the spatial strategy remains the same as previously presented. The detailed changes were reflected in the revised site allocations: 21 strategic sites, 23 housing allocations, 7 employment sites, 1 student housing site and 1 Travelling Showpeople site. Paragraphs 6.5.5 to 6.5.19 of the report [CD008] summarises the findings of the appraisal of the spatial strategy. Paragraphs 6.5.20 to 6.5.58 of the report [CD008] presents the summary of the appraisal of the strategic sites and other allocations. Reasons for the allocation or rejection of site alternatives is set out in Appendix K [CD009c]. The updated reasons for allocation or rejection of sites is presented in Appendix E (Updated Audit Trail) of the SA Report Addendum [Appendices (EX/CYC/24b)].

- 3.7.26 In order to evaluate harm on York's heritage assets and landscape character, the SA is informed by the Heritage Impact Appraisal for policies and sites. This assessment has helped into inform officers understanding of the spatial principles set out in policy SS1 and their application in site assessment and appraisal. Whilst new development will inevitably bring change to the character of the City particularly where this is associated with strategic sites, assessment against SA objective 15 (Landscape) considers that the effects on York's landscape setting can, for the most part, be mitigated (Para 6.5.15 CD008]). Assessments of objective 14 on the strategic developments to be removed from the Green Belt broadly conclude minor negative effects (Para 6.5.36 [CD008]). Where harm is identified, the appraisal states that negative effects for heritage and landscape impacts can be mitigated through the implementation of policies in the Local Plan [CD008, para 6.5.37]. Furthermore, cumulative impacts on the city as a result of the spatial strategy are considered in section 6.7 of the submitted SA [CD008].
- 3.7.27 The work carried out as part of the SHLAA has also focussed on ensuring that sites are selected having regard to the principles of sustainable development. The site selection methodology set out in the SHLAA (2018) [SD049B] and ELR [SD064] uses the spatial evidence to select the most suitable and sustainable sites for development. The SHLAA [SD049] and ELR [SD064] sites selection process has assessed all land above 0.2ha within the authority boundary which has a willing landowner, regardless of its location. These sites have then been subject to a 2 part process to consider sites against principles similar to those set out in policy SS1. This is set out in detail in Section 2.3 of SD049A and Annex 1 [SD049B]. As a result land parcels are identified in locations which represent most sustainable patterns of development as they cause the least harm to important environmental attributes of the city. Sites were scored in relation to their proximity to identify the overall sustainability of the site and those which achieved a score over the threshold, were taken forward to the next stage. The scores of the sites considered are set out in the SHLAA (2018) Annex 2a [SD049b]. Assessing land in this way primarily identified parcels, which were close to the existing urban area. Strategic sites were identified, which were consistent with these principles and criteria methodology of an appropriate size to enable the development of sustainable communities and/or self-sustaining new settlements. In identifying these sites, it was recognised that in some cases sites may not be able to comply fully with all aspects of the methodology in particular criterion 4: access to services and sustainable transport, however it was considered that strategic scale sites would be of an appropriate size to provide new or enhanced services and sustainable transport routes. Sites which passed the first stage of assessments above were considered reasonable alternatives for development. These sites were taken to a Technical Officer Group consisting of experts from around the council to understand more about site specific suitability and which sites should progress as a potential development site. In addition, technical officers identified showstoppers to development or areas for concern while responding to any additional evidence submitted in support of a site. This site specific process sought to find the sites which matched the most

sustainable pattern of development by identifying those which would cause the least harm to the environment of York and have the opportunity to build the most sustainable communities. The results of the officer groups were published as part of the Site Selection Paper (2013) [SD072A], Further Sites Consultation (2014) [SD073], Site Selection Paper Addendum (2014) [SD073] and Preferred Sites Consultation (PSC) (2016) [SD018, SD019]. Annex 6 of the SHLAA (2018) [SD049b] and Annex K of the Sustainability Appraisal [CD009c] present the outcomes of the technical officer process. Technical officer comments also informed the appraisal of strategic sites in the SA [CD008 and CD009].

- 3.7.28 Section 4.4 of the Green Belt Topic Paper [TP001] highlights the alignment between the methodology underpinning the spatial distribution of housing, in particular the need to keep areas of land open and undeveloped and assessment of the green belt. Table 1 (page 24) illustrates how each of the site selection principles, which stem from the Policy SS1, have taken into account, linked with the SHLAA methodology. The linkage between the principles and factors influencing green belt openness and purposes is detailed in full against in section 4 of the Green Belt Paper Addendum [EX/CYC/18]. In addition, Section 7 of the Addendum explains how the Council has sought to locate new development in areas which do not require the release of green belt land, before explaining how the site selection process has been reviewed against the spatial strategy and against green belt purposes, to identify sites that are all in sustainable locations offering least harm to the green belt. Further details are provided in Annex 5 [EX/CYC/18b].
- 3.7.29 The methodologies employed by these documents have therefore sought to identify the most sustainable patterns of development overall, finding sustainable solutions for the challenge of reconciling the need to provide housing and employment land with the need to safeguard the historic character and setting of York, whilst also ensuring accessibility to sustainable modes of transport and services and taking into account other sustainability considerations.