



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

**PHASE 2 HEARINGS**

**MATTER 7: APPROACH TO SETTING THE  
GREEN BELT BOUNDARIES**

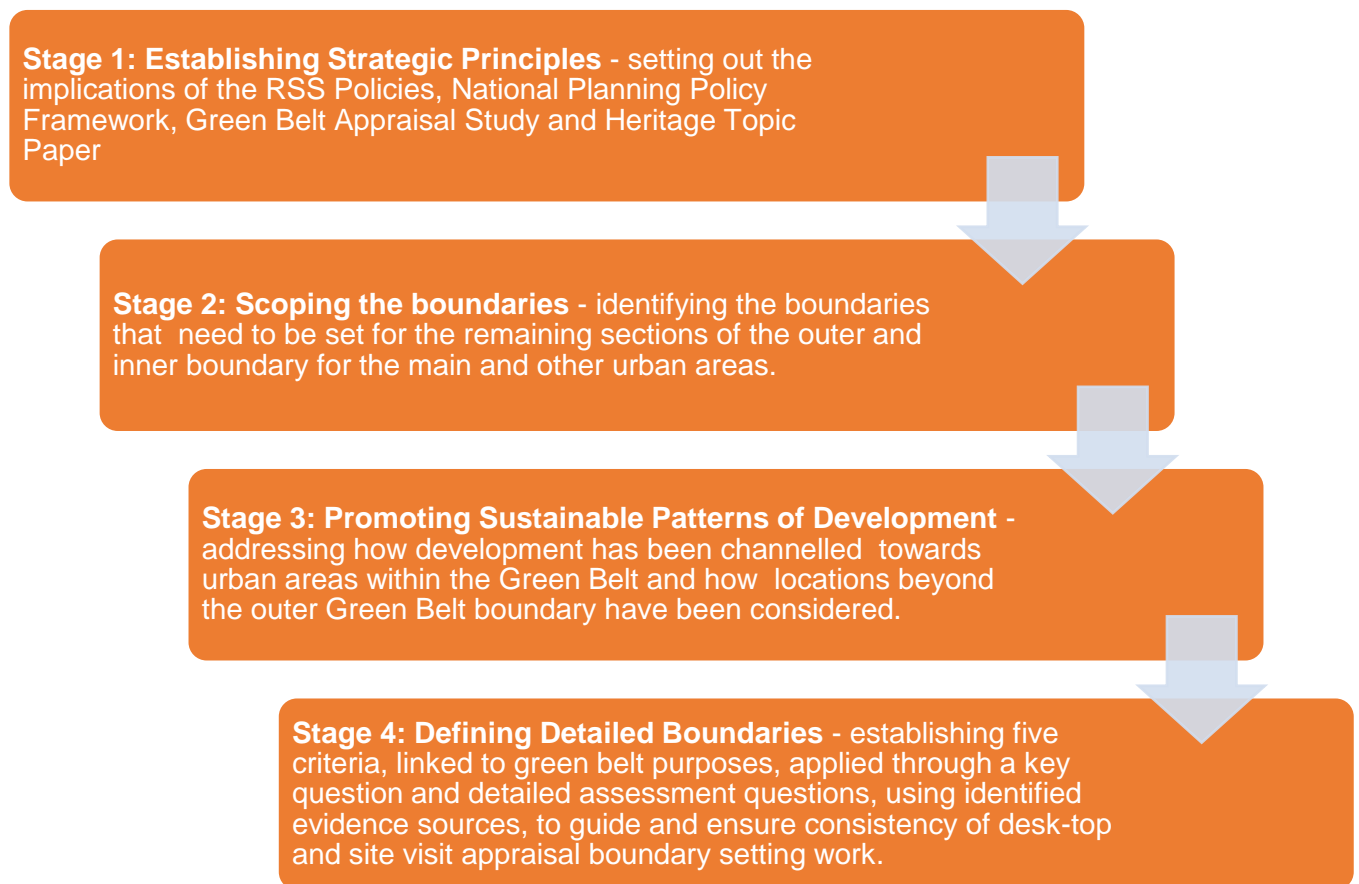
**CITY OF YORK COUNCIL STATEMENT**

## Matter 7 – Approach to Setting Green Belt Boundaries

7.1 This Local Plan will formally define the boundaries of the York Green Belt for the first time. The Council’s approach to defining the Green Belt boundaries now proposed is set out in ‘Topic Paper TP1 – Approach to Defining York’s Green Belt: Addendum’ (January 2021) [EX/CYC/59]. In the light for the evidence, in setting the proposed Green Belt boundaries:

a) how, in simple summary, have the proposed boundaries been arrived at?

7.1.1 The proposed Green Belt boundaries have been arrived at through a four-stage methodology, summarised in the diagram and further explained below.



7.1.2 Stage 1 of the methodology is fully explained at Section 5 of EX/CYC/59. It identifies 13 strategic principles through:

- analysis of RSS Green Belt policies;
- understanding the policy approach and purposes of Green Belt set out in the National Planning Policy Framework (NPPF) (2012); and

- further consideration of the nature and relevance of key evidence set out in the Green Belt Appraisal (2003) [SD107] and subsequent historic character and setting updates (2011 [SD108] and 2013 [SD106]), and the Heritage Topic Paper (2014) [SD103].

7.1.3 Stage 2 scopes the boundaries, as set out in Section of EX/CYC/59. This has been established through:

- a review of where York Green Belt boundaries have already been defined beyond the administrative area of York, through the development plans for Hambleton, Harrogate, Ryedale and Selby;
- a density analysis exercise to establish the extent of the main built-up area of York and also applied to other built-up areas in the general extent of the York Green Belt; and
- consideration of the degree of openness and contribution to the Green Belt that a village or urban area makes.

7.1.4 An explanation of Stage 3 of the methodology can be found at Section 7 of EX/CYC/59. It considers the need to promote sustainable patterns of development, through:

- channelling development towards urban areas, and towns and villages within the Green Belt
- considering locations beyond the outer Green Belt boundary.
- taking into account the need to ensure consistency with the Local Plan strategy for meeting identified development requirements.

7.1.5 Stage 4 defines the detailed approach for setting Green Belt boundaries. This stage of the methodology is set out in Section 8 of the EX/CYC/59 and has involved the following:

- establishing five criteria which link to the three relevant Green Belt purposes and strategic principles and reflect key features of the general extent of the York Green Belt and its broad function and role;

- developing a key overarching question to set the goal of each criterion; and
- setting detailed assessment questions and relevant evidence base studies and documents for each criterion, to provide the focus for the assessment of the role and function of land and the relative delineation of boundaries to be considered alongside appreciations gained from site visits.

7.1.6 In summary the function and role of land, whether the land fulfils one or more of the Green Belt purposes, has been considered through a single assessment exercise. There are four stages in this exercise and the methodology is applied through criteria and associated questions that have been guided and informed by both strategic and detailed considerations. Strategic principles ensure that key features of the general extent of the York Green Belt, its broad function and role and the requirements of RSS and national planning policies are reflected in boundary setting. Detailed questions provide the focus for a more specific and granular level of assessment ('on the ground' and 'on a small-scale map') of Green Belt boundaries, which has been undertaken through desk top study and site visit appraisals with the associated use of evidence sources and policy guidance.

**b) what influence have heritage assets and other environmental designations, such as conservation areas and SSSIs had on the setting of Green Belt boundaries?**

7.1.7 The methodology reflects the role of Green Belt as a strategic spatial policy designation. The Council recognises that the Green Belt is not a heritage designation, although it is informed by heritage issues; nor is it an environmental or landscape designation. The boundary setting methodology is not being used to protect heritage assets and their setting. Neither EX/CYC/18 nor EX/CYC/59 set out a methodology that justified Green Belt boundaries based on the presence of heritage assets. Set out in Section 8 of EX/CYC/59, the detailed assessment considerations in Stage 4 of the methodology are now clearer as to how heritage assets and their setting provide evidence and context for boundary setting. Understanding the location of heritage assets and information in relation to the age and context of land has also been considered to inform the Council's understanding of the value of this land to the principle of historic character and setting. Whilst such information does not necessarily indicate land which needs to be kept permanently open, it has provided

context to inform site visits and decision-making. Openness may be important to the setting of a heritage asset such as a conservation area, and this is taken into account in the boundary setting exercise. The open setting of a heritage asset can add to the significance or the understanding of a monument itself and/or a wider/historic landscape. The consideration of Listed Buildings has been in terms of whether land needs to be kept permanently open to understand the original siting or context of a building (or landmark or monument).

7.1.8 The origin of the three criteria relating to Green Belt purpose 4 'to preserve the setting and special character of historic towns' lies in the Heritage Topic Paper (2014) [SC013] and Statutory Consultee Historic England have confirmed in a Statement of Common Ground that compactness, landmark monuments and landscape setting demonstrably contribute to the special character of York to varying degrees depending on the location.

7.1.9 Existing open spaces, designated nature conservation sites and green infrastructure corridors often have strong connections to the countryside. CYC/EX/59 at Section 8 clarifies that such designations can equally be located within built up areas and that the identification of land within such categories does not determine that it necessarily needs to be kept permanently open. Nature conservation and other environmental designations provide one source of evidence for considering openness and considering whether land has the characteristics of countryside.

**c) how does the approach now taken in the aforementioned new evidence differ from the method previously used by the Council and what is the reason for the differences?**

7.1.10 The Council accepts the criticisms made by the Inspectors [EX/INS/15] in relation to the original TP1 Addendum [EX/CYC/18]. The revised Addendum [EX/CYC/59] addresses the concerns raised and adds explanation and commentary to demonstrate that the delineation of the proposed boundaries is robust and justified. It does so by taking up the indication from the Inspectors that a revised, simpler methodology could have avoided some of their concerns. As set out in Sections 2 and 11 of EX/CYC/59, the revised TP1 Addendum is a clarification of the

methodology, using the same evidence base, with no new evidence or studies being introduced. Table 5, Clarifications Table in Section 11 [EX/CYC/59] sets out the differences between the revised [EX/CYC/59] and original approach [EX/CYC/18] and explains how the reasons for these differences relate to the Inspectors' principal concerns [EX/INS/15].

7.1.11 The Council recognised that the original topic paper required modification to provide clarity and explain more simply and directly how the evidence base was applied, using key criteria, principles and questions relevant to Green Belt purposes. The clarified methodology includes criteria for boundary definition which have more clearly expressed connections to Green Belt purposes. Elements that have caused confusion have also been removed or further explained. The detailed explanations of boundaries set out in the annexes are more clearly linked to the assessment criteria and questions, thereby providing further detail and consistency of presentation.

7.1.12 Much of the content in the assessments is the same or broadly similar, however the framing and structure of the assessment has changed in order to clarify the method and make it more relevant to Green Belt terminology.

**d) how has the need to promote sustainable patterns of development been taken into account?**

7.1.13 As presented in our response to question 7.1a, the promotion of sustainable development (NPPF 2012 paragraphs 84 and 85) is addressed by Stage 3 of the methodology. Section 7 of EX/CYC/59 explains how the Council, in accordance with the NPPF, has taken account of the need to promote sustainable patterns of development, in particular by channelling development towards urban areas, and towns and villages within the Green Belt and considering locations beyond the outer Green Belt boundary. There is a link between the overall effect of Green Belt Boundaries and the promotion of sustainable development and ensuring consistency with the Local Plan strategy (see 7.1f) . Section 8 (f) of EX/CYC/59 summarises how the Green Belt boundary setting exercise is consistent with the local plan strategy which has been influenced by spatial shapers and principles that deliver sustainable

growth for York, as set out in Policy SS1 (Table 5 in Section 11 of EX/CYC/59 explains how the spatial shapers have not determined Green Belt boundaries).

**e) how have 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 or towards locations beyond the outer Green Belt boundary been considered?**

7.1.14 Section 7 of EX/CYC/59 explains how the Council has sought to maximise development potential within urban areas (including the main urban area, villages and industrial estates). It also identifies how much of the city's identified needs can be accommodated within urban areas, and what the shortfall in supply is. This shortfall represents how much additional land needs to be identified, beyond the existing urban area.

7.1.15 As set out in Section 7d of EX/CYC/59, options to channel development to locations beyond the authority boundaries were considered. However, whilst the option of accommodating some of York's development needs in adjacent local authority areas was fully explored prior to Submission, it does not provide an alternative approach for meeting development needs. Neighbouring authorities have agreed, through the Statement of Common Ground ([EX/SoCG/2) that the individual authorities should meet their own authority needs within the preparation of their own plans. In any event, it is considered that channelling development towards locations beyond the outer Green Belt boundary would risk introducing unsustainable patterns of development to meet York's needs.

7.1.16 As a consequence, the Green Belt within the City of York administrative area therefore provides the only available source of land that could realistically address the identified shortfall whilst, still supporting a sustainable pattern of development, in line with the Local Plan Strategy.

**f) how do the proposed Green Belt boundaries ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development?**

7.1.17 There is a link between the overall effect of Green Belt Boundaries and ensuring consistency with the Local Plan strategy for meeting sustainable development (NPPF 2012 paragraphs 84 and 85). The Council has fully examined all reasonable options for meeting its identified need for development and concludes that it would not be possible to meet the Objectively Assessed Housing Need, Employment Land requirement, Education and Gypsy and Traveller Housing Need in York without releasing land from the general extent of the Green Belt. The approach is set out in full in EX/CYC/59 as follows:

- Section 4 summarises the development needs to be delivered through the Local Plan;
- Section 7 identifies how much of this need can be accommodated within the urban area and what the shortfall in supply is to enable the city to meet its identified needs; and
- Section 9 explains the site identification and selection process in accordance with the Local Plan strategy, consideration of the role of Heritage Impact Assessments in minimising harm to the Green Belt and offsetting through compensatory improvements.

7.1.18 The Local Plan takes the strategic view, endorsed by statutory consultee Historic England, to deliver a development strategy which looks to accommodate growth through maximising the use of Brownfield land and limiting peripheral growth, to safeguard key elements of the city's historic character and setting. It is agreed with Historic England in a Statement of Common Ground that the proposed strategic approach, accommodating some of York's development needs as new freestanding settlements and the site allocations as identified, will result in far less harm to the special character and setting of the historic city than would be caused by development on the edge of the existing built up area.

7.1.19 Consistency between the proposed Green Belt boundaries and the Local Plan Strategy for meeting sustainable development is achieved by there being the same



emphasis on protecting York's historic character and setting in the spatial strategy set out in Policy SS1 of the plan [CD001] and the strategic principles that form part of the methodology for setting the Green Belt boundaries.

**7.2 As a matter of principle, do the proposed Green Belt boundaries include any land which it is unnecessary to keep permanently open?**

7.2.1 No, the proposed Green Belt boundaries do not, as a matter of principle, include any land which it is unnecessary to keep permanently open. To do so would be contrary to national policy. Land included in the Green Belt has been assessed as meeting one or more of the identified purposes of Green Belt.

**7.3 Overall, is the approach to setting Green Belt boundaries clear, justified and effective and is it consistent with national policy?**

7.3.1 Yes, the Council consider the approach to setting Green Belt boundaries is clear. In responding to the Inspectors concerns, the approach to setting Green Belt boundaries has been clarified in EX/CYC/58, explaining more simply and directly how the evidence base was applied, using key criteria, principles and questions relevant to Green Belt purposes. See response to Questions 7.1a) and c).

7.3.2 The approach is justified, it reflects national, regional and local policy requirements for the Green Belt. The SA [CD008] confirms that definition of the city's Green Belt through Policy SS2 will help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the city and look to concentrate development in the urban area, with attendant sustainability benefits. It will also assist in preserving and enhancing the special character and setting of York. The approach to setting Green Belt boundaries is based on proportionate, robust and up to date evidence (see Annex 1 to EX/CYC58]. It has also been subject to extensive consultation which has allowed for effective engagement of interested parties [CD013, EX/CYC/22 and EX/CYC/65].

7.3.3 The approach to setting Green Belt boundaries is effective, being deliverable and coherent. The approach has resulted in detailed inner and outer Green Belt

boundaries being proposed. This will ensure that the setting and special character of York is safeguarded. Furthermore, the Duty to Co-operate has been met [EX/HS/M1/LR/0a/CYC], as such, the approach to setting Green Belt boundaries is based on effective joint working on cross boundary strategic priorities. The agreed statement of common ground with neighbouring authorities confirms there are no outstanding unresolved strategic issues relating to the approach to the Green Belt [EX/SOCG/2].

- 7.3.4 Finally, the approach is consistent with national (and RSS) policy. The boundary setting methodology reflects the fundamental aim and purposes of Green Belt (NPPF 2012 paragraphs 79 and 80). This is reflected throughout EX/CYC/59, in particular by the strategic principles set in Stage 1 of the methodology (see response to question 7.1a above) and in the applied criteria and questions at Stage 4.
- 7.3.5 The proposed Green Belt boundaries are capable of enduring beyond the plan period in accordance with NPPF 2012, paragraph 83. Many of the strategic allocations identified in the plan have anticipated build out times beyond the plan period and there is headroom identified for both employment and housing development against the identified requirements. Some of the land, previously considered for safeguarding has been incorporated in the strategic allocations. This approach to strategic allocations provides greater certainty in providing the required permanence and supports the delivery of sustainable development/communities. The existing windfall assessment is considered to be conservative, in light of relaxed permitted development rights relating to office conversions being made permanent and evidence of substantial numbers of unimplemented consents from this source of housing supply. The Council's approach ensures that development can continue within York without the need to alter Green Belt boundaries the end of the plan period and that it can endure for at least five years.
- 7.3.6 The methodology for defining Green Belt boundaries develops criteria which are drawn from NPPF 2012 (paragraphs 84 and 85), as set out in Section 3b of EX/CYC/59. This sets out that land which it is unnecessary to keep permanently

open has not be included in the proposed Green Belt and that the permanence of Green Belt boundaries that will not need to be altered at the end of the development plan period has been ensured. Furthermore, boundaries have been defined clearly, using physical features that are readily recognisable and likely to be permanent. This approach is carried through into the detailed consideration of boundaries set out in the Annexes to EX/CYC/59.

- 7.3.7 In line with NPPF 2012 (paragraph 86), the character of villages and whether it makes an important contribution to the openness of the Green Belt has been addressed through Stage 2 of the methodology and is detailed in Section 6 and Annex 4 of EX/CYC/59.