



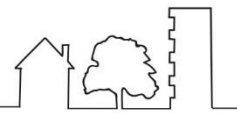
**AIREDON**  
PLANNING & DESIGN

## York Local Plan Examination

Phase 2: Matter 7 Statement

Mr J Harrison

March 2022



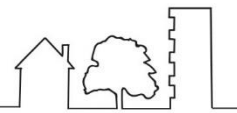
## **Matter 7 – Approach to Setting Green Belt Boundaries**

### **1. Summary of representations:**

- The overall premise set out in the York Local Plan at Proposed Options stage identifies that the most sustainable pattern of development to take forward would be to concentrate development within the existing urban area, and then plan for sustainable urban extensions supplemented by a single new settlement of a size sufficiently large to create a new sustainable community. However, having allocated land which had not been assessed for green belt importance, which required removal from the allocation at ST14, there is suddenly another new settlement, of a much smaller scale which will not result in a sustainable settlement. This results in a plan that does not live up to the early priorities set by the LPA and which is therefore fundamentally flawed and in that it promotes development that will not be sustainable.
- The plan has failed to properly consider Green Belt at an early enough stage, resulting in allocation of land that needs to be kept open, and subsequent redrawing of boundaries. Whilst this reduces the harm to the Green Belt, it results in a form of development which will be unsustainable and which does not accord with York's own policies.
- The plan fails to properly consider the impact of new development on the Green Belt compared to existing development. In some circumstances this results in a form of development that will be unsustainable.
- The plan fails to follow guidance on the setting of boundaries to the Green Belt to ensure that the Green Belt is permanent.
- The Plan is fundamentally flawed for the above reason. The only reasonable action that should be taken is a complete restructure of the Plan and to start again in the Plan making process.

*(Question 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 light of the evidence, in setting the proposed Green Belt boundaries:*

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



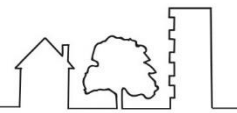
2. Our previous comments have identified that the proposed allocation at ST14 was not properly assessed under the original Sustainability Appraisal as, at the time, it was a sustainable extension to the York Urban Area and of a size which would enable it to support services and facilities that would enable it to be sustainable. The reduced size of the allocation was not reassessed under the original size assessment of the Sustainability Appraisal and the size of the site deigned to be sustainable was reduced subsequently to enable this site to skip the sustainability review. When it was changed from a sustainable urban extension to a stand-alone settlement it was also reduced in size which renders it significantly less sustainable.
3. The Green Belt Addendum 'Approach to defining the Green Belt' makes it clear (Paragraph 4.60) that four options were considered at Preferred Options stage, and that Option 1 was 'taken forward' as it was the most sustainable of the options. This option was :

"Prioritise development within and / or as an extension to the urban area and through the provision of a single new settlement".

4. This is clearly why ST14 was originally an extension to the urban area, rather than a stand-alone settlement. Paragraph 4.63 suggests that this preferred option would help to ensure that any land taken forward for development would not undermine York Green Belt in terms of preserving the setting and special character of York. Indeed, in the Preferred Options document, the site is listed under sustainable urban extensions, and not as the one stand-alone new settlement. So, the larger site was originally considered not to undermine York Green Belt – presumably some sort of assessment was carried out at this stage rather than simply drawing a big loop on the side of York as a sustainable urban extension, given the history of Green Belt issues in the past.
5. The later versions suddenly appeared to notice the problem with this sustainable urban extension, and, with no audit trail, this sustainable urban extension suddenly became a new settlement in its own right, despite a reduced scale and no sustainability assessment of its location or reduced size.

*e) how have the consequences for sustainable development of channeling 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?*

6. The original strategy for York was very clear and understandable, and suggested that sustainability was at the heart of the plan – priority for redevelopment of sites within the urban area, sustainable urban extensions and a single large new settlement. However, one of these sustainable urban extensions has suddenly become detached from the urban area, and reduced



in scale, and no proper assessment of the sustainability of this site (ST14) appears to have been considered.

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

7. There is little consistency achieved in setting the Green Belt boundaries in terms of the new site at ST14. Some of the boundaries fail to even follow established field boundaries. Moreover, if the principles that have been established for other parts of the Green Belt, such as the distance required between housing development and the Ring Road are applied to ST14, its southern boundary would have to be further removed from the Ring Road. It is clearly nonsense that it is necessary to ensure that there is significantly more open land between existing development and the ring road than new development, particularly as most new development is likely to be of a denser and higher form than the established southern boundary development of Wiggington and Skelton. Indeed, if it is possible to build that close to the ring road without adversely affecting the Green Belt, as suggested by the Council's own assessment, it would have been possible to extend both Wiggington and Skelton in a way that would have accorded with the original Option 1 set out at the Proposed Options stage. This would have been both in accordance with the Council's own Policy and also more sustainable than the current proposals.

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

8. There is no clear approach to setting Green Belt boundaries. In places the boundaries identified bisect a field and follow no clear line. This is not consistent with national policy