

CITY OF YORK LOCAL PLAN EXAMINATION

MATTER 4 - STRATEGIC SITES

1 Introduction

- 1.1 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the City of York Local Plan's preparation and the Statement of Common Ground (SoCG) signed with the City of York Council [The Council] with regards to the Phase 3 Hearing session Matters, Issues and Questions.
- 1.2 This hearing statement relates specifically to our objection to the allocation of site ST31 Land at Tadcaster Road, Copmanthorpe under Local Plan Policy SS16, as set out in the City of York Publication Draft Local Plan [Doc. CD001]. Historic England also maintain concerns about the soundness of a number of other Local Plan allocation sites that will be subject to consideration under Matter 4 of the Phase 3 Hearings. However, we are happy to rely on our comments submitted at the Publication Draft Local Plan stage and the SoCG in relation to these sites.
- 1.3 The historic City of York is unique and particularly sensitive to inappropriate and harmful change within its setting. Site ST31 is an important part of the landscape setting of the historic City of York that plays a role in allowing its special character to be appreciated. The proposed development would cause harm to the historic City of York in two fundamental ways. Firstly, it would result the loss of an area of farmland which forms part of the open countryside beyond the main built-up area of the City, thereby failing to preserve the landscape setting of the City. Secondly, it would harm the relationship of the main built-up area with one of its surrounding villages. These are both Character Elements of the special character and setting of the historic City identified in the Heritage Topic Paper Update [Doc. SD103]. As such, development of this site would undermine the primary purpose of the York Green Belt.
- 1.4 Consequently, the allocation of Site ST31 as proposed in the Submission Local Plan is considered to be in conflict with the following aspects of the emerging Local Plan:
- The Local Plan Vision – in that it conflicts with the intention the city's place making and spatial planning policies reflect its heritage and contemporary culture, contributing to the economic and social welfare of



the community whilst conserving and enhancing its unique historic, cultural and natural assets.

- Policy DP1: York Sub Area - in that would not define a Green Belt around York which will safeguard the special character and setting of the historic city.
- Policy DP2: Sustainable Development – in that it will not conserve or enhance those elements which contribute to the special character and setting of the City by ensuring that development is in acceptable locations.
- Policy DP3: Sustainable Communities – in that it would not respect and enhance the historic character, green spaces and landscape of York.
- Policy SS1: Delivering Sustainable Growth – in that it would not conserve and enhance the city’s character and setting.
- Policy SS2: The Role of York’s Green Belt – in that it conflicts the primary purpose of the York Green belt which is to safeguard the setting and special character of York.

1.5 It would also be contrary to national planning policy as set out in the NPPF insofar as it would not:

- Contribute to protecting or enhancing the historic environment. Therefore, it will not deliver sustainable development in terms of the conservation of the historic environment [NPPF Paragraph 7].
- Respond to local character and history, and reflect the identity of local surroundings [NPPF, Paragraph 58].
- Help to achieve the fundamental aim of the Green Belt in preventing urban sprawl by keeping land permanently open [NPPF, Paragraph 79].
- Preserve the setting and special character of historic towns, the primary purpose of the York Green Belt, prevent neighbouring towns from merging into one another, or assist in safeguarding the countryside from encroachment [NPPF, Paragraph 80].
- Help to deliver a positive strategy for the conservation and enjoyment of the historic environment [NPPF 2012, Paragraph 126].

2 Responses to the Inspector’s Questions

Q4.17 Is the allocation and associated Policy SS16 relating to ST31 soundly based?

Q4.18 Are the Green Belt boundaries of the ST31 site reasonably derived?

2.1 The site is likely to have formed part of the agricultural hinterland of Copmanthorpe during the medieval period. The site remains important to this



day for its function as providing an open, rural buffer between Copmanthorpe and the edge of the city of York. Historic England considers that the development of this site would harm elements which have been identified by your Authority as contributing to the special character and setting of the historic City of York. As such, development of this site would undermine the primary purpose of the York Green Belt. The Archaeological Desk-Based Assessment and Built Heritage Report submitted with the application does not consider the potential impact on the setting of the historic City of York.

- 2.2 Policy SS2 of the Submitted Local Plan makes it clear that the primary purpose of York's Green Belt is to preserve the special character and setting of the historic city. This primary purpose has been confirmed on numerous occasions starting with the 1988 booklet, 'The Green Belts'¹, which stated that the primary purpose of the York Green Belt was "to safeguard the character of the historic city which might be endangered by unrestricted expansion" and has been reaffirmed throughout the years by Ministerial Statements, Local Plan Inspectors, and by numerous Inspectors' decisions on Appeal. In 2013 the Government issued SI2013 No. 117 which, again, reaffirmed that the Green Belt around York should be established to safeguard the special character and setting of the historic city attests to the fact that this remains the key consideration when determining not simply where the detailed Green Belt boundaries should be drawn but also what is the most appropriate development strategy for the York Local Plan.
- 2.3 Given the above we fully support the emerging Local Plan's identification of the preservation of the setting and special character of York as the primary purpose of the York Green Belt. In view of the importance of the historic environment of York, the conservation and enhancement of the City's heritage assets should be the starting point for the development strategy.
- 2.4 As part of the background work on the emerging City of York Local Plan, the Council has undertaken a great deal of work to identify the various elements which contribute to the special character and setting of the historic City. This work has helped to provide a framework against which to consider not only the appropriateness of the development strategy for the future growth of the City, but also the individual sites where that growth might be accommodated. That document, the 'Heritage Topic Paper', identified six principal characteristics of the historic city that help define the special qualities of York. Under each of these Principal Characteristics, a number of Character Elements were identified. The loss of this site and its subsequent development would result in harm to a number of these Principal Characteristics.

¹ *The Green Belts*, Department for the Environment, HMSO, 1998



- 2.5 Residential development on this site would result the loss of an area of farmland which forms part of the open countryside beyond the main built-up area of the City. This would harm one of the Character Elements identified as contributing to York's landscape and setting. This site is perceived as being very much a part of the swathe of open countryside to the south of the ring road. Although the railway runs to the south of this site, the perception is of a rail line running through open countryside rather than an area which has been severed from the surrounding landscape by the railway.
- 2.6 Development of this area would also harm the relationship of the main built-up area with one of its surrounding villages. The relationship which the historic City of York has to its surrounding villages is identified in the Heritage Topic Paper as being another of the Character Elements of the City's landscape and setting. As the Heritage Topic Paper makes clear, this relationship relates to not simply the distance between the settlements but also the size of the villages themselves, and the fact that they are freestanding, clearly definable settlements. The new Park and Ride site at Askham Bar has effectively extended the southern edge of the built-up area of the City to within 350 metres of the A64. As a result, this has considerably narrowed the gap between what might now be regarded as the southern edge of the main built-up area of York and the northern edge of the village of Copmanthorpe. If developed in line with Policy SS16, this allocation would bring Copmanthorpe 175 metres closer to the edge of the City and would reduce the gap between York and the village to little more than the field that lies between the A64 and the slip road onto Tadcaster Road.
- 2.7 The Council considered Copmanthorpe, along with other densely developed areas in the general extent of the Green Belt, in Topic Paper 1: Approach to defining York's Green Belt Addendum (2021) Annex 4 [Doc. EX/CYC/59f]. The assessment of Copmanthorpe, an area excluded from the Green Belt, highlights that with regards to Green Belt Purpose 4:
- The land around Copmanthorpe needs to be kept permanently open to maintain the scale and identify of a compact village in rural landscape and to prevent the village expanding such that it loses connection with its historic core.
 - The village is visible from approach roads across agricultural landscape, and maintains a connection to its open and historic setting.
 - The southern and eastern edges of the village is particularly important in retaining separation with Bistophorpe village to the east, and the villages northern boundary in preventing coalescence between Copmanthorpe and the urban area of York.



- The land needs to be kept permanently open to protect the setting and special character of the wider city landscape and character of York, which includes a clock face of smaller compact villages, particularly as perceived from open approaches.

2.8 Whilst the Heritage Impact Assessment [Doc, SD102] for site ST31 concludes that the development of this site would only result in minor harm the landscape and setting of the historic City due to the impact on the village setting and the separation from the urban fringe, it acknowledges that:

- Mitigation of the effect on the open countryside and Green Belt is not likely to be possible since it is the undeveloped openness of the fields that provides this characteristic.
- The free standing nature of the village would become less obvious (despite its already close association with the A64).

3 Conclusions

3.1 Historic England objects to the allocation of site ST31 as it would harm the special character and setting of the historic City of York, contrary to Green Belt Purpose 4.

4 Suggested change

4.1 Site ST31 should be deleted from the Plan.

ENDS

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5 July 2022