



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

PHASE 3 HEARINGS

MATTER 4: STRATEGIC SITES

CITY OF YORK COUNCIL STATEMENT

Matter 4 – Strategic Sites

The strategic allocations for residential development have been positively prepared in response to the City's housing requirement and spatial context. The Council's site selection process and methodology was considered as part of Matter 4 in the phase 2 hearings. It is therefore not necessary to repeat that information in response to questions in this hearing statement. However, the assessments made to determine each strategic site's suitability and consideration of alternatives (in accordance with the methodology) are referred to in table 1 below for ease of reference.

All strategic site allocations have been subject to assessment as part of the whole plan viability appraisal (SD018, and more recently HS/P2/M6/IR/1b(i)), which has included testing of appropriate plot ratios along with the implications of delivering all Local Plan policy requirements. This work underpins the effectiveness of each allocation and demonstrates deliverability/developability.

The responses provided below in relation to each allocation's soundness focus on deliverability, including information where relevant on the planning status of the site.

Table 1: Strategic Site Key Document References

Strategic Site	Sustainability Appraisal Appendix K – Policy and Site Audit Trail [CD013b]	Executive report 25th January 2018 - Annex A [CD013d]	Strategic Housing Land Availability Assessment 2018 [SD049b]	Strategic Housing Land Availability Assessment 2017 Annex 1 [SD054]	Preferred Sites Consultation Paper 2016 [SD018]
ST5	187 (PDF)	58 (PDF)	28 (PDF)	27 (PDF)	128 (PDF)
ST1	185 (PDF)	76 (PDF)	21 (PDF)	24 (PDF)	172 (PDF)
ST2	185 (PDF)	81 (PDF)	32 (PDF)	25 (PDF)	176 (PDF)
ST4	186 (PDF)	85 (PDF)	16 (PDF)	26 (PDF)	125 (PDF)
ST17	199 (PDF)	144 (PDF)	32 (PDF)	69 (PDF)	143 (PDF)
ST32	209 (PDF)	152 (PDF)	32 (PDF)	36 (PDF)	147 (PDF)
ST7	188 (PDF)	89 (PDF)	30 (PDF)	61 (PDF)	137 (PDF)
ST8	190 (PDF)	99 (PDF)	30 (PDF)	28 (PDF)	199 (PDF)
ST9	191 (PDF)	109 (PDF)	30 (PDF)	30 (PDF)	205 (PDF)
ST14	195 (PDF)	120 (PDF)	30 (PDF)	63 (PDF)	210 (PDF)
ST16	198 (PDF)	140 (PDF)	30 (PDF)	32 (PDF)	42 (PDF)
ST31	209 (PDF)	148 (PDF)	18 (PDF)	34 (PDF)	48 (PDF)
ST33	211 (PDF)	155 (PDF)	30 (PDF)	36 (PDF)	76 (PDF)
ST36	212 (PDF)	174 (PDF)	32 (PDF)	-	-

4.1 Is the allocation and associated Policy SS4 relating to ST5 soundly based?

4.1.1 The allocation for York Central (ST5) reflects extensive work undertaken over a number of years to redevelop one of the largest brownfield sites in England. The site is being brought forward through the Your Central Partnership involving Homes England, Network Rail, the City of York Council and the National Railway Museum.

4.1.2 The allocation, as proposed, includes the entirety of the York Central area which has been subject to masterplanning work and subsequently granted outline planning permission (application reference 18/01884/OUTM). It also includes adjacent land in private ownership and land currently used for rail operations. This land is not expected to be suitable for residential use and has not been included in the capacity calculations.

4.1.3 The outline planning permission was granted in December 2019 and establishes the principle for the site's mixed-use redevelopment for up to 379,729 m² of floorspace Gross External Area (GEA), primarily comprising:

- up to 2,500 homes (Class C3),
- between 70,000 m² and 87,693 m² of office use (Class B1a),
- up to 11,991 m² GEA of retail and leisure uses (Classes A1-A5 or D2)
- hotel with up to 400 bedrooms (Class C1),
- up to 12,120 m² GEA of non-residential institutions (Class D1) for expansion of the National Railway Museum,
- multi-storey car parks and
- provision of community uses.

4.1.4 The amounts and uses approved are consistent with Policy SS4. However, modification to the referenced B1a and A2 listed use classes is required to be consistent with the legislative changes introduced in 2020 and the new Class E.

4.1.5 With regards residential uses, the capacity for 2,500 dwellings has been accepted through the outline permission. In advance of further detail emerging through reserved matters applications, evidence supports the deliverability of at least 1,700 dwellings on the site [SD028c]. This is reflected in Policy SS4, which expresses the amount of residential development as a range. It is an effective policy approach that appropriately responds to the complexity of the site's delivery and the timescale over which it will be developed out.

4.1.6 At the time the policy was originally drafted, it was expected that 1,500 dwellings would be delivered within the plan period. CYC now anticipates around 950 homes being delivered by 2033 [EX/CYC/76] and modifications are proposed to Policy H1 and Policy SS4, to reflect this (see CYC latest modification schedule).

4.1.7 Justification for the site's deliverability in respect of new housing is provided at EX/CYC/76a. Notwithstanding the extended lead-in time to that

which was forecast in earlier evidence, EX/CYC/76a demonstrates that the site remains developable during the plan period and full completion will extend beyond.

- 4.1.8 The outline consent grants up to 87,693 m² of office use. It is also acknowledged that there may be some potential for additional office floor space to come forward on land outside the area with outline approval. Policy SS4 therefore supports 100,000 m² of office use within the ST5 allocation. It is, however, recognised that the policy is unduly prescriptive in requiring exactly 100,000m² of office use in the absence of more detailed work. A modification is proposed to support approximately 100,000m² (see CYC latest modification schedule).
- 4.1.9 Considerable and demonstrable progress has been achieved on schemes related to ST5 over recent years which provides sound evidence in support of the site's allocation. The 15 development principles set out in Policy SS4 remain effective and relevant in the context of extant planning permissions on the site. No further modifications are considered necessary for soundness.

4.2 Is the allocation and associated Policy SS6 relating to ST1 soundly based?

- 4.2.1 The boundary, as proposed on the policies map, reflects the area granted outline planning permission in September 2018 (application reference 15/00524/OUTM). It also includes remaining land either side of the approved access road (application reference 17/01072/FUL) that is part of the former Manor School site.
- 4.2.2 The principle of development is established by the outline planning permission, which relates to most of the site. Site capacity is aligned to this with 1,100 dwellings approved on the British Sugar part of the site and approximately 100 dwellings on the former Manor School parcel.
- 4.2.3 Whilst not related to the whole of ST1, the viability of the scheme related to the majority of the brownfield allocation was tested through the outline application process and related negotiations on s106 legal agreements. Work has continued since that approval, which demonstrates a clear commitment to the development of the site and validates assumptions around its developability during the plan period. Further details are provided in EX/CYC/76a.
- 4.2.4 The 8 development principles set out in Policy SS6 are effective and relevant in the context of extant planning permissions on the site. No modifications to the policy are considered necessary for soundness.
- 4.2.5 At paragraph 3.41 of the explanatory text, reference is made to the possible need to phase development around the lifecycle of bees and wasps on the SINC within the site. In March 2020 the Council discharged the

condition (number 12) requiring a Biodiversity Protection Plan for the SINC. The approved plan does not require construction to be phased in any way. A modification to delete the sentence at 3.41 is, therefore, proposed (see CYC latest modification schedule).

4.3 Is the allocation and associated Policy SS7 relating to ST2 soundly based?

4.3.1 Yes. Planning permission was granted on appeal for 266 homes on the site in 2019 and construction works have commenced. The first homes are due to be complete at the end of 2022.

4.4 Is the allocation and associated Policy SS8 relating to ST4 soundly based?

4.4.1 Yes. The allocation is soundly based and represents a logical and suitable location for residential development adjacent the Grimston Bar Park and Ride and the University of York. With reference to the assessments in Table 1 above, the site allocation is justified and is consistent with national planning policy.

4.4.2 The approximate capacity of the site has been calculated on the basis of the Council's archetype assumptions for large suburban sites (70% developable area, at 40 dwellings per hectare). Whilst there are two applications totalling 228 dwellings pending decision, it is understood that the developer is preparing a revised scheme that is consistent with the quantum expressed in Policy SS8.

4.4.3 As set out in the Council's Housing Trajectory (EX/CYC/76, and supporting evidence at EX/CYC/76a, completions are expected to begin in 2024/25 and the site developed out by 2029/30. The Council is therefore confident that this site can be delivered during the Plan period.

4.4.4 Policy SS8 identifies 9 key principles that development is expected to adhere to. In the main, these are effective and justified. However, modifications are proposed to criterion ii, v, vii and viii to improve the policy's effectiveness (see CYC latest modification schedule).

4.4.5 The explanatory text at 3.45 refers to a neighbourhood parade north of the site and the requirement for road safety measures to ensure safe crossing of the dual carriageway. However, there are now local facilities at the precinct off Kimberlow Rise which would serve the development on ST4. A modification is proposed to reflect this (see CYC latest modification schedule).

4.5 Is the allocation and associated Policy SS15 relating to ST17 soundly based?

4.5.1 Yes. It was identified as a potential allocation in the early phases of the plan's development after Nestle Rowntree determined to upgrade and

improve facilities in the northern part of their site, leaving redevelopment opportunities on the southern part.

4.5.2 The site's capacity was initially informed by prospective developers at the time and was later adjusted to account for the scheme approved to convert the factory buildings to 263 dwellings (phase 1). The remainder of the site was assumed to be capable of delivering 600 dwellings and referred to as phase 2.

4.5.3 The application for the factory conversion was later varied to support a total of 279 dwellings and that conversion work is now underway. In January 2022 full planning permission was granted on the western part of the site (phase 2) for 302 homes. The capacity of the site has been updated to align with approved schemes (EX/CYC/76) and modifications to Policies SS17 and H1 are proposed to reflect this (see CYC latest modification schedule).

4.5.4 As set out in the Council's Housing Trajectory (EX/CYC/76, and EX/CYC/76a), phase 1 is expected to complete in 2023/24 and phase 2 delivered between 2024 and 2033. Viability matters have been explored through the planning application processes and separately tested through whole plan viability work. The site is viable, and the Council is confident that it can be delivered within the Plan period.

4.6 Is the allocation and associated Policy SS17 relating to ST32 soundly based?

4.6.1 Yes. The allocation relates to a wider 4.1ha site located at the edge of the commercial core of the city centre which has been undergoing mixed use redevelopment since it first received outline planning permission in 2005.

4.6.2 Policy SS17 now gives effect to the development of the remaining residential blocks yet to be constructed (blocks D, G and H). Collectively these blocks have extant permissions for a total of 571 dwellings and modifications to Policy SS3, Policy SS17 and Policy H1 are proposed to reflect this. Modification to the site area shown on the policies map and in table 5.1 is also required for consistency and clarity.

4.6.3 The capacity assumed for block H is indicative as no reserved matters scheme has been approved to date and it is understood that the developer is exploring higher density options. It is therefore proposed that the revised wording at Policy SS17 refers to a minimum of approximately 570 dwellings. The flexibility provided by the modification is consistent with the NPPF requirement for policies to be positive and flexible, and for the full development potential of sites to be optimised (paragraph 58).

4.6.4 Additional modifications to Policy SS17 are required to delete reference to conformity with the approved masterplan. Compliance with the masterplan approved as part of earlier planning permissions is unduly restrictive and

would not permit sufficient flexibility in the event that alternative schemes come forward on the site.

4.6.5 As the Huntgate Development Brief has not been updated since 2006, it is considered necessary to make clear that its content be taken into account that where relevant.

4.6.6 As set out in the Council's Housing Trajectory (EX/CYC/76, and supporting evidence at EX/CYC/76a), apartment blocks are expected to complete in 2025/26 and the final block 2029/30. The Council is therefore confident that this site can be delivered during the Plan period.

4.6.7 All proposed modifications referred to above are identified in CYC latest modification schedule.

4.7 Is the allocation and associated Policy SS9 relating to ST7 soundly based?

4.7.1 Yes. ST7 is proposed to be a new free-standing settlement to the east of York's urban area. The site allocation is justified and is consistent with national planning policy. With reference to the assessments in Table 1 above, the site allocation is justified and is consistent with national planning policy.

4.7.2 The approximate capacity of the site has been calculated on the basis of the Council's assumption for strategic sites (70% developable area, at 35 dwellings per hectare). The site's viability has been tested as part of the whole plan viability work and all updates and iterations to CD018 demonstrate that the development of the site is viable and capable of delivering all infrastructure requirements of the Plan's policies.

4.7.3 Development is expected to commence on site in 2024/25 with construction of the access and preliminary site works. Housing completions are to follow in the next year and the site is predicted to be developed out over the remainder of the plan period. Further details and evidence to support these assumptions are included at EX/CYC/76a. The Council considers the site suitable and developable.

4.7.4 Development proposals for the site are required to comply with Policy SS9 identifies and the 11 key principles it establishes. In the main, these are effective and justified. However, modifications are proposed to some of the criterion to improve the policy's effectiveness and clarity (see CYC latest modification schedule).

4.7.5 Additionally, PM58 [REF] proposes a modification to criterion ix in response to the 2020 HRA work and the identified potential recreational impacts on Strensall Common SAC. The policy approach is considered sound and has been agreed with Natural England.

4.8 Are the Green Belt boundaries of the ST7 site reasonably derived?

For ease, maps showing all of the Green Belt boundaries in question have been appended to this Statement

- 4.8.1 Section 7 of EX/CYC/59 explains how, in accordance with the NPPF, the Council has taken into account the need to promote sustainable patterns of development, by channelling development towards urban areas, and towns and villages within the Green Belt and considered locations beyond the outer Green Belt boundary.
- 4.8.2 Site selection generally was based on sustainability principles that aligned with the spatial strategy. This is relevant to Green Belt policy as boundary setting needs to be carried out in a way that is consistent with the spatial strategy. Site selection and SA processes have had regard to the historic character and setting of York, the primary Green Belt purpose. More specifically SA objectives 14 and 15 have a strong correlation with Green Belt policy. Alongside the findings of the SA, a Heritage Impact Assessment (HIA) has informed the appraisal of the draft Local Plan and the appraisal of draft strategic sites. Thereby all proposed development within the Local Plan has been assessed against all principal characteristics identified by the Heritage Topic Paper (SD103).
- 4.8.3 A clear and defensible Green Belt boundary has been defined around the strategic site allocations applying the boundary methodology set out in Section 8 of TP1 Green Belt Addendum (EX/CYC/59) and taking into account the findings of the Heritage Topic Paper and the Heritage Impact Assessment, as well as the findings of the SA. The boundaries have been defined in accordance with the Strategic Principles set out in TP1 (EX/CYC/59), in particular Strategic Principles 6, 7, 12 and 13 (p38-39):
- SP6 - The Heritage Topic Paper Principal Characteristics set the framework for assessing overall impact and harm on the historic character and setting of the city (and examining sprawl and encroachment).
 - SP7 - The characteristics of York that are relevant to keeping land permanently open to protect the historic character and setting of the city and therefore relevant for setting the detailed boundaries of the York Green belt are: compactness, landmark monuments, and landscape and setting.
 - SP12 - York Green Belt boundaries will be created that will not need to be altered at the end of the plan period (2033).
 - SP13 - Detailed boundaries will be defined clearly, using physical features that are readily recognisable and likely to be permanent.

- 4.8.4 The answer to Q4.7 above provides clarity on why ST7 was selected. The boundary definition methodology applies to all aspects of boundary definition, including the identification of boundaries for new settlements. The Green Belt boundaries for ST7 are described in Annex 5 of the Green Belt Addendum EX/CYC/59g at pA5:13 and A5:14. Boundary 1 to the north partly consists of Tang Hall Beck with the remainder of the boundary not being defined by any features on the ground. Boundary 2 to the east consists of field boundaries and Outgang Lane. Boundary 3 to the south consists of a field boundary. Boundary 4 to the west consists of field boundaries. With the exception of part of Boundary 1, all of the boundaries follow recognisable and permanent features. It is recommended in the assessment that a new boundary would need to be created as part of the masterplanning of the site and an additional criterion in Policy SS9 is proposed to that effect. There are no alternative boundaries which could be used for Boundary 1 given that the boundary applied seeks to mitigate the potential harm to Purpose 4 of the Green Belt by retaining separation from the inner urban boundary in order to ensure a new identifiable, compact district.
- 4.8.5 The summary section on pA5:15 of Annex 5 of the Green Belt Addendum EX/CYC/59g explains how the potential harm to the Green Belt has been mitigated taking into account the findings of the Heritage Topic Paper and the Heritage Impact Assessment. The proposed boundary is set back from the A64 in order to maintain key views and the rural setting of the city which is important to Purpose 4. The proposed boundary has been pulled back from the existing urban area to the west and the south in order to prevent coalescence and ensure it is a new identifiable compact district. Maintaining the scale and identity of York and its districts is important to protecting Purpose 4. Overall, a clear and defensible Green Belt boundary has been defined in accordance with the methodology. The proposed boundary is therefore sound.

4.9 Is the allocation and associated Policy SS10 relating to ST8 soundly based?

- 4.9.1 Yes. ST8 is proposed as a norther extension to Monks Cross commercial and shopping area to the northeast of the City. With reference to the assessments in Table 1 above, the site allocation is justified and is consistent with national planning policy.
- 4.9.2 Viability matters have recently been scrutinised through a planning application process and subsequent appeal against non-determination. The inquiry was held January and decision is due in August. Given the progress made through the course of the inquiry, there is sufficient evidence to

demonstrate the site is suitable and developable within the plan period [EX/CYC/76a].

4.9.3 Development proposals for the site are required to comply with Policy SS10 identifies and the 11 key principles it establishes. In the main, these are effective and justified. However, modifications are proposed to some of the criterion to improve the policy's effectiveness and clarity (see CYC latest modification schedule).

4.9.4 Additionally, PM60 [EX/CYC/58] proposes a modification to criterion vi in response to the 2020 HRA work and the identified potential recreational impacts on Strensall Common SAC. The policy approach is considered sound and has been agreed with Natural England.

4.10 Are the Green Belt boundaries of the ST8 site reasonably derived?

4.10.1 The answer to Q4.8 above provides further detail on the approach to site selection and the Green Belt boundary definition methodology. The Green Belt boundaries are described in Annex 3 of the Green Belt Addendum EX/CYC/59d at pA3:453 (Section 5, Boundary 21-27). Boundary 27A (western boundary) consists of sections of historic field boundaries lined by trees and hedgerow. Boundary 27B (northern boundary) follows North Lane. Boundary 27C (eastern boundary) follows Monks Cross Link Road. On the whole, the boundaries follow recognisable and permanent features. It is acknowledged in the assessment that some parts of Boundary 27A are not defined by any features on the ground. It is recommended that a new boundary would need to be created as part of the masterplanning of the site and an additional criterion in Policy SS9 is proposed to that effect.. There are no alternative boundaries which could be used for Boundary 27A given that the boundaries applied seek to mitigate the potential harm to the Green Belt.

4.10.2 The summary section on pA3:453 of Annex 3 of the Green Belt Addendum EX/CYC/59d explains how the potential harm to the Green Belt has been mitigated taking into account the findings of the Heritage Topic Paper and the Heritage Impact Assessment. The proposed boundary is set back from the Outer Ring Road with North Lane and Monks Cross Link Road forming the northern and eastern boundaries. This is in order to preserve compactness and the rural setting of the City which is important to Purpose 4. It also explains that development has been stepped back from Huntingdon creating a new green wedge to the west of the site in order to safeguard the setting and distinct identity of Huntingdon. Maintaining the scale and identity of York and its districts is important to protecting Purpose 4. Overall, a clear and defensible Green Belt boundary has been defined in accordance with the methodology. The proposed boundary is therefore sound.

4.11 Is the allocation and associated Policy SS11 relating to ST9 soundly based?

4.11.1 Yes. ST9 is proposed as a norther extension Haxby. With reference to the assessments in Table 1 above, the site allocation is justified and is consistent with national planning policy.

4.11.2 Development proposals for the site are required to comply with Policy SS11 identified and its 11 key principles. In the main, these are effective and justified. However, modifications are proposed to some of the criterion to improve the policy's effectiveness and clarity (CYC latest modification schedule).

4.11.3 Additionally, PM60 [EX/CYC/58] proposes a modification to criterion iii in response to the 2020 HRA work and the identified potential recreational impacts on Strensall Common SAC. The policy approach is considered sound and has been agreed with Natural England.

4.12 Are the Green Belt boundaries of the ST9 site reasonably derived?

4.12.1 The answer to Q4.8 above provides further detail on the approach to site selection and the Green Belt boundary definition methodology. The answer to Q4.11 above provides clarity on why the site was selected. The Green Belt boundaries are described in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:161. ST9 is shown on pA4:158. ST9 is located to the north of Haxby/Wigginton adjoining the settlement along the site's southern boundary. The western boundary of ST9 follows Moor Lane, the northern boundary follows field boundaries, and the eastern boundary follows Usher Lane. The boundaries therefore consist of hedge and tree lined field boundaries and roads, all of which represent recognisable and permanent features. Overall, a clear and defensible Green Belt boundary has been defined in accordance with the methodology The proposed boundary is sound.

4.13 Is the allocation and associated Policy SS12 relating to ST14 soundly based?

4.13.1 Yes. ST14 is proposed to be a new free-standing settlement to the north of York's urban area. With reference to the assessments in Table 1 above, the site allocation is justified and is consistent with national planning policy.

4.13.2 Prior to the withdrawal of the previous Publication Draft Local Plan (October 2014), the developers undertook and submitted a full package of technical assessments associated with the delivery of the previously proposed larger site allocation boundary associated with the delivery of 4,020 homes documents included:

- Masterplanning & Design Vision Document – JTP Architects
- Landscape & Visual Impact Assessment – Turkington Martin
- Transport Assessment – Fore Consulting
- Ecological Appraisal – Baker Consulting
- Archaeology Assessment (including trial trenching work) – York Archaeological Trust
- Air Quality Assessment – ARUP
- Geology & Ground Conditions Report – ARUP
- Noise Impact Assessment – ARUP
- Flood Risk & Drainage Appraisal – ARUP
- Utilities Report – ARUP
- Sustainability Statement – ARUP
- Tree Survey – Barnes & Associates
- Statement of Community Involvement – JTP Architects

4.13.3 Development is expected to commence on site in 2024/25 with construction of the access and preliminary site works. Housing completions are to follow in the next year and the site is predicted to be developed out over the remainder of the plan period, completing in around 2035. Further details and evidence to support these assumptions are included at EX/CYC/76a. The Council considers the site suitable and developable.

4.13.4 Development proposals for the site are required to comply with Policy SS12 identifies and the 13 key principles it establishes. In the main, these are effective and justified. However, modifications are proposed to some of the criterion to improve the policy's effectiveness and clarity (see CYC latest modification schedule).

4.13.5 Additionally, PM61 [REF] proposes a modification to criterion ix in response to the 2020 HRA work and the identified potential recreational impacts on Strensall Common SAC. The policy approach is considered sound and has been agreed with Natural England.

4.14 Are the Green Belt boundaries of the ST14 site reasonably derived?

4.14.1 The answer to Q4.8 above provides further detail on the approach to site selection and the Green Belt boundary definition methodology. The boundary definition methodology applies to all aspects of boundary definition, including the identification of boundaries for new settlements. The answer to Q4.13 above provides clarity on why the site was selected. The Green Belt boundaries for ST14 are described in Annex 5 of the Green Belt Addendum EX/CYC/59g at pA5:29 and A5:30. Boundary 1 to the north consists of a tree and hedge lined field boundary. Boundary 2 to the east consists of tree lined field boundaries and a dense tree belt (Nova Scotia Plantation). Boundary 3 to the south is not defined by any physical features on the ground. Boundary 4 to the west consists of medium height hedges and sporadic mature trees. With the exception of Boundary 3, all of the boundaries follow recognisable and permanent features. It is recommended in the assessment that a new boundary would need to be created for Boundary 3 as part of the masterplanning of the site and an additional criterion in Policy SS12 is proposed to that

effect. There are no alternative boundaries which could be used for Boundary 3 given that the boundary applied seeks to mitigate the potential harm to the Green Belt by separating the site from the outer ring-road (A1237) to maintain the rural setting and to avoid the perception of sprawl.

- 4.14.2 It is acknowledged in the assessment that the existing boundaries are likely to need strengthening. Although most of the proposed boundaries are already recognisable and permanent, this is to ensure permanence in the long term. It is not possible to only allocate sites which are defined by strong permanent boundaries due to the need to balance Green Belt matters with site selection criteria and the need to mitigate any potential harm to the Green Belt. It is considered that development can provide the opportunity to create a strong new defensible Green Belt boundary.
- 4.14.3 The summary section on pA5:31 of Annex 5 of the Green Belt Addendum EX/CYC/59g explains how the potential harm to the Green Belt has been mitigated taking into account the findings of the Heritage Topic Paper and the Heritage Impact Assessment. The proposed boundary is set back from the outer ring-road (A1237) and the inner urban boundary to maintain the rural setting and avoid perception of sprawl which is important to Purpose 1 and Purpose 4. The proposed boundary is also set back from Skelton village to the west in order to prevent coalescence and retain the setting of the village. Maintaining the scale and identity of York and its districts is important to protecting Purpose 4. The proposed boundary is therefore sound.

4.15 Is the allocation and associated Policy SS14 relating to ST16 soundly based?

- 4.15.1 Yes. The site allocation is justified and consistent with national planning policy. ST16, as presented in the submitted Local Plan, combines three brownfield sites that are part of wider redevelopment of a former factory to the east of the racecourse.
- 4.15.2 The approximate capacity calculations in table 5.1 of Policy H1 have been superseded by more recent assumptions documented in EX/CYC/76 and EX/CYC/86.
- Phase 1: Conversion of Clock Tower is nearing completion
 - Phase 2: 70-bed extra care apartment scheme, currently at appeal.
 - Phase 3: construction of a new healthcare facility on the site is underway.
- 4.15.3 In light of the change in circumstances on sites, modifications to Policy SS14 are required (see CYC latest modification schedule). It is no longer necessary or effective for phase 1 or 3 to be included in the policy as development on both sites has commenced.

4.15.4 Phase 2 continues to progress as a residential site (albeit in a different form to that originally envisaged) and whilst the capacity of the scheme being promoted equates to 39 dwellings (ratio applied for communal developments), it is not necessary to modify the indicative capacity of 33 in Policy SS14. The Council considers the site suitable and deliverable. The development principles related to this part of the site in Policy SS14 are justified and effective.

4.16 Are the Green Belt boundaries of the ST16 site reasonably derived?

4.16.1 The answer to Q4.8 above provides further detail on the approach to site selection and the Green Belt boundary definition methodology. The answer to Q4.15 above provides clarity on why the site was selected. The site is located within the urban area and the site's southern and south eastern boundaries consist of the Green Belt boundary. The Green Belt boundaries are described in Annex 3 of the Green Belt Addendum EX/CYC/59e at pA3:824 (Section 8, Boundary 13) and pA3:831 (Section 8, Boundary 14). The south eastern boundary of ST16 described at pA3:824 consists of the riverside path, trees, hedges and metal security fencing around Terry's car park site. The southern boundary of ST16 described at pA3:831 consists of Bishopthorpe Road, mature trees and hedge and a metal security fence with a footpath and cycle path immediately beyond this. These boundaries therefore represent recognisable and permanent features. Overall, a clear and defensible Green Belt boundary has been defined in accordance with the methodology. The proposed boundary is sound.

4.16.2 It is noted that the western boundary of ST16 as previously submitted in the City of York Local Plan (2018) was itself the Green Belt boundary however the boundary around York Racecourse was modified from the previous 2018 boundary in order to ensure consistency with the Green Belt methodology (PM 93), as set out in Annex 6 of the Green Belt Addendum (Proposed Modifications Schedule for Green Belt) EX/CYC/59h at pA6:34. The modification extends the Green Belt boundary further west beyond the western boundary of ST16

4.17 Is the allocation and associated Policy SS16 relating to ST31 soundly based?

4.17.1 Yes. ST31 is a greenfield extension to Copmanthorpe village. With reference to the evidence in Table 1 above, the site allocation is justified and consistent with national planning policy.

4.17.2 The approximate capacity of the site has been calculated on the basis of developer's design and masterplanning work on the site, which is currently subject to planning application. The site's viability is being tested through this process as well as having been considered as part of the whole plan viability

work. All updates and iterations to CD018 demonstrate that the development of the site is viable and capable of delivering all infrastructure requirements of the Plan's policies. That is reflected in the scheme pending decision. The Council considers the site suitable and deliverable.

- 4.17.3 Development proposals for the site are required to comply with Policy SS16 and the 8 key principles it establishes. In the main, these are effective and justified. However, modifications are proposed to some of the criterion to improve the policy's effectiveness and clarity (see CYC latest modification schedule).

4.18 Are the Green Belt boundaries of the ST31 site reasonably derived?

- 4.18.1 The answer to Q4.8 above provides further detail on the approach to site selection and the Green Belt boundary definition methodology. The answer to Q4.17 above provides clarity on why the site was selected. The Green Belt boundaries are described in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:33. ST31 is shown on pA3:31. ST31 is located to the east of Copmanthorpe adjoining the settlement along the site's western boundary. The northern boundary of ST31 follows the A64 and Tadcaster Road, and the eastern and southern boundaries follow the East Coast Main Line. The boundaries therefore consist of roads and the railway line which represent recognisable and permanent features. . Overall, a clear and defensible Green Belt boundary has been defined in accordance with the methodology. The proposed boundary is sound.

4.19 Is the allocation and associated Policy SS18 relating to ST33 soundly based?

- 4.19.1 Yes. ST33 is a greenfield extension to Wheldrake village. With reference to the evidence in Table 1 above, the site allocation is justified and consistent with national planning policy.
- 4.19.2 The approximate capacity of the site has been calculated on the basis 70% developable area @ 35dph. This has been taken forward in the developer's design and masterplanning work on the site, which is currently subject to planning application. The site's viability is being tested through this process as well as having been considered as part of the whole plan viability work. All updates and iterations to CD018 demonstrate that the development of the site is viable and capable of delivering all infrastructure requirements of the Plan's policies. That is reflected in the scheme pending decision. The site is suitable for residential development and deliverable.
- 4.19.3 Development proposals for the site are required to comply with Policy SS18 and the 10 key principles it establishes. In the main, these are effective and justified. However, modifications are proposed to some of the criterion to improve the policy's effectiveness and clarity (see CYC latest modification schedule).

4.20 Are the Green Belt boundaries of the ST33 site reasonably derived?

4.20.1 The answer to Q4.8 above provides further detail on the approach to site selection and the Green Belt boundary definition methodology. The answer to Q4.19 above provides clarity on why the site was selected. The Green Belt boundaries are described in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:317. ST33 is shown on pA4:314. ST33 is located to the south west of Wheldrake adjoining the settlement along the site's northern and eastern boundaries. The southern boundary of ST33 consists of a hedge and tree lined field boundary, and the south western boundary consists of the extent of curtilage of Millfield Industrial Estate and field boundaries. The boundaries therefore consist of field boundaries and the curtilage of existing buildings which represent recognisable and permanent features. Overall, a clear and defensible Green Belt boundary has been defined in accordance with the methodology. The proposed boundary is sound.

4.21 Is the allocation and associated Policy SS20 relating to ST36 soundly based?

4.21.1 Yes, with reference to the documents in Table 1 above, the site allocation is justified and consistent with national planning policy. The site is developable within the later phase of the plan period.

4.21.2 CYC progressed work on this allocation following the announcement in 2016 that three barracks sites in York would be released. The site extends circa 30ha and is considered to have a net developable area of approximately 19ha with approximately 11 ha available for of public open space and an estimated capacity of 770 dwellings. The Defence Infrastructure Organisation (DIO) has confirmed that the site will be disposed of by 2031 and has carried out technical analysis of the site to inform the site capacity and its deliverability within the period 2032-2037.

4.21.3 The site's viability has been tested as part of the whole plan viability work and all updates and iterations to CD018 demonstrate that the development of the site is viable and capable of delivering all infrastructure requirements of the Plan's policies.

4.21.4 Policy SS18 requires development proposals for the site to comply with 14 key principles. These are effective and justified. However, a modification is proposed to the introductory text so that it reads "...approximately 769 dwellings". This is necessary for flexibility (see CYC latest modification schedule).

4.22 Are the Green Belt boundaries of the ST36 site reasonably derived?

- 4.22.1 The answer to Q4.8 above provides further detail on the approach to site selection and the Green Belt boundary definition methodology. The northern boundary of ST36 follows a hedged tree line along the northern extent of the Imphal Barracks site which represents the Green Belt boundary. The eastern boundary of the ST36 follows Hollands Road which was previously identified as the Green Belt boundary in the City of York Local Plan (2018) however this boundary was modified in order to ensure consistency with the Green Belt methodology (PM 90), as set out in Annex 6 of the Green Belt Addendum (Proposed Modifications Schedule for Green Belt) EX/CYC/59h at pA6:31. The modification extends the Green Belt boundary further east beyond the eastern boundary of ST36. The justification for the inner boundary in this location (Section 7, Boundary 18) is provided in Annex 3 of the Green Belt Addendum EX/CYC/59e at pA3:741 to A3:748. As stated on pA3:747, the northern section of the boundary follows a hedged tree line along the northern extent of the Imphal Barracks site. It then follows the hard surfaced area around the buildings extending south, before turning west onto Hollands Road.
- 4.22.2 The assessment explores a number of alternative boundaries in this location including whether to exclude the outdoor sports fields and pitches from the Green Belt and utilise the boundary of the barracks, as well as including the eastern-most buildings of the barracks within the Green Belt and utilising Hollands Road as the boundary (as was previously the case). The assessment concludes that whilst both of these alternatives would represent recognisable and permanent features, they would risk sprawl and encroachment and potential harm to the Green Wedge and the Stray. A further alternative boundary would be to exclude the outdoor tennis courts and squash court building adjacent to Hollands Road from the Green Belt however the edge of the hard surfaced area to the north represents a more recognisable and permanent boundary with would prevent encroachment. Overall, a clear and defensible Green Belt boundary has been defined in accordance with the methodology. The proposed boundary is therefore sound.