



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

PHASE 3 HEARINGS

MATTER 6: NON-RESIDENTIAL STRATEGIC SITES

CITY OF YORK COUNCIL STATEMENT

Common Background to Questions 6.1, 6.2 & 6.3

- 6.1 The sites contribute to delivering the Spatial Strategy and providing sufficient land to accommodate an annual provision of around 650 new jobs as required by Policy SS1 (CD001). Policy EC1: Provision of Employment Land (CD001) sets out that provision will be made for a range of employment uses and distinguishes strategic (over 5ha) from other sites. Policy EC2, alongside EC1, is integral to the Plan strategy for meeting needs as explained in the Council’s Phase 2 Matter 3 hearing statement and hearing sessions.
- 6.2 An update to Table 4.1 of CD001 setting out employment land and floorspace requirements by use class was provided under Matter 3.

Table 1 Update to Plan Table 4.1

Use Class	2021-33		2033-38		Total 2021-2038	
	Floorspace (m2)	Land (Ha)	Floorspace (m2)	Land (Ha)	Floorspace (m2)	Land (Ha)
Office (formerly B1a)	137,588	15.5	12,310	2.1	149,898	17.6
Research and Development (B1b)	15,655	3.7	1,644	0.4	17,299	4.1
Light Industrial (formerly B1c)	11,218	1.9	1,435	0.4	12,653	2.3
General Industrial (B2)	0	0	0	0	0	0
Storage and Distribution B8	54,986	10.5	15,705	3.2	70,691	13.7
B Uses Sub Total	219,447	31.6	31,094	6.2	250,541	37.7
D2	-17,887	-1.1	4,398	1.1	-13,489	0.0
Totals	201,560	30.5	35,492	7.2	237,052	37.7

- 6.2 Ongoing engagement with neighbouring authorities has not identified any unmet requirements for employment land that need to be addressed.

Early Site Selection Stages

- 6.3 The choice of sites for employment has drawn on the **site selection methodology** (SD064, Employment Land Review 2016, Section 6, paragraphs 6.1.2 & 6.1.3). Site

ST37 reflects planning consents on the site and the outcomes of more recent site allocation and sustainability appraisal work. This is explained further below.

- 6.4 All potential employment land sites were scored against a **four-stage criteria-based** methodology, reflecting the emerging Spatial Strategy and the spatial shapers. Sites were avoided in areas important for the protection of the City's unique heritage, for the protection of environmental assets, and for the appropriate management of flood risk. The scope to achieve accessibility to sustainable modes of transport and a range of services was the fourth consideration. Employment sites needed to score above 13 points to be taken forward to the next stage (and satisfy a minimum access requirement for criteria 4). Site ST37 was initially excluded through the site selection work, see SD072B Annex 7 - Sites removed after Criteria 1 (Environmental Assets) Assessment (page 326).
- 6.5 Sites passing Stage 1 were then taken to **CYC's Technical Officer Group** for more detailed consideration regarding their potential for development. Further views were sought from consultants Driver Jonas Deloitte regarding economic potential (Site Selection Technical Paper (June 2013) Annexes 16 & 17 - Deloitte Assessments, SD072b, Annex 16 pages 652 and 654).
- 6.6 Shortlisted sites, including ST19 and ST26, were subject to an **economic assessment** (SD064, Section 6) considering alignment with private sector requirements and demand for employment land, and market trends; and the achievement of local and wider economic ambitions (see results in Table 10 below).

Table 10: Outcomes of Economic Assessment

LPPd Ref (2014)	Site Ref	Site Name	Economic Score for B1 (Score out of 58)	Economic Score B2/B8 (Score out of 44)
ST5	293	York Central	44	22
ST27	794	University of York Heslington East Campus and Expansion	40	24
E15	828	Land at Hull Road	38	23
E17 (ST19)	847	Northminster Business Park	35	24
E12	684	York Business Park	32	22
ST26	97	South of Elvington Airfield Business Park	29	19
ST25	800	Land South of Designer Outlet	28	21
E16	742	Poppleton Garden Centre	27	20
E4	64	Land at Layerthorpe and James St	26	14
E5	307	Land at Layerthorpe and James St	26	14
E9	602	Elvington Industrial Estate	25	17
ST18	724	Monks Cross North	25	17
SF13 (ST6)	181	Land East of Grimston Bar	24	16
E10	706	Chessingham Park, Dunnington	24	16
E2	635	Land north of Monks Cross Drive	21	15
E7	599	Wheldrake Industrial Estate	21	15
E8	600	Wheldrake Industrial Estate	19	14
E11	639	Annamine Nurseries	17	13

Allocation of Employment Sites & Sustainability Appraisal

- 6.7 Appendix K of the Sustainability Appraisal (CD009c) sets out an audit trail of the officer assessment and resulting actions from the submission of a site through to the 2018 publication draft Local Plan, including boundary alternatives considered (see pages K212, K200, and K211 for ST19, ST26 and ST37).
- 6.8 Individual site appraisals for ST19, ST26 and ST37 are set out in Sustainability Appraisal Appendix I (CD009b pages 163, 184 and 264). A matrix assesses each strategic site by each SA objective and provides a commentary on significant effects, uncertainties, assumptions, recommendations and mitigation or enhancement (drawing on the Local Plan Evidence Base).

Q6.1 Is the allocation and associated Policy SS21 relating to ST26 soundly based?

Q6.2 Is the allocation and associated Policy SS23 relating to ST19 soundly based?

6.2.1 Both the allocations ST26 & ST19 ‘passed’ the early site selection stages and scored well in the economic assessment (see Table 10 above). The policies and allocations are soundly based:

- They positively contribute to meeting the overall spatial strategy of the plan in providing for proposed level of growth (650 jobs per annum); delivering the city’s economic ambitions; providing for the assessed need for employment land and floorspace; and achieving sustainable development by delivering the spatial strategy and have been subject to Sustainability Appraisal (see CD9b Appendix I)
- Are justified based on robust evidence, including site selection evidence and the Employment Land Review, which draws on forecasts from the Oxford Economic Model, York’s Economic Strategy and the York Economic Outlook in establishing employment land requirements
- Are deliverable over the period, based on the site selection and economic assessment findings, responses to previous LP consultation stages and ongoing checks with site promoters to confirm availability and deliverability for employment use
- Are consistent with the economic role of planning (NPPF 2012), contributing to the achievement of sustainable development and building a strong, competitive economy.

6.2.2 Site-specific requirements under each Policy are explained in the tables below based on commentary in the SA.

Policy SS21/ST36 – Key Policy Requirements (See page 70, C001)	Justification (For SA references see CD009B, SA Appendix I, pages 203-212)
25,080sqm of B1b, B1c, B2/B8 floorspace	Reflects the needs for B1, B2 & B8 uses. Updated Table 4.1 identifies requirements for the period 2021-2038 of: <ul style="list-style-type: none"> • 149,898 (m2) Office (B1a)

	<ul style="list-style-type: none"> • 17,299 (m2) for Research & Development (B1b) • 12,653 (m2) for Light Industrial (B1c) • 70,691 (m2) for Storage and Distribution (B8)
<p>i. ecological assessment</p>	<p>See commentary against SA objective 8. The proposed development is located in proximity to Brinkworth Rush Site of Importance for Nature Conservation (SINCs). An ecological survey has identified that part of the SINC is of city-wide nature conservation importance for its species-rich neutral grassland and fen meadow.</p> <p>A survey in 2008 recorded an exceptional population of great crested newts occurring within ponds surrounding the business park. To the north of the site is Elvington Airfield which has two identified SINCs for grassland and is a SINC in its entirety designated for birds. Its value is both in its grasslands with its associated invert fauna and for birds, both breeding and overwintering.</p> <p>There is an area of woodland to the west of the site along with woodland strips on field boundaries to the south and west.</p>
<p>ii. historic field boundaries iii. landscaping/screening</p>	<p>See commentary against SA objectives 14 & 15.</p> <p>Landscape assessment and mitigating measures are required.</p>
<p>iv. transport issues</p>	<p>See commentary against SA objective 6. The size of the employment development is likely to generate additional car journeys and HGV movements, which could result in additional peak hour traffic follow onto the surrounding highway network. Additional impacts on the road network would require consideration, particularly in relation to Elvington Lane which leads to the A64.</p> <p>Currently there is no access to frequent or non-frequent bus routes in vicinity of this site and there are limited public transport options to enable a modal shift enough to minimise use of the car. Pedestrian links and cycle routes are also limited. As such it is anticipated that</p>

	<p>there will be a reliance upon travelling to the site by private car.</p> <p>See EX/CYC/79. The site is within the same broad corridor to the east of the city as the University of York, Grimston Bar Park and Ride, ST15 which will deliver over 3000 dwellings and the settlements of Elvington and Dunnington – which provides opportunities to promote sustainable transport opportunities.</p>
v. air quality, noise and light pollution & contamination	<p>See commentary against SA objectives 2 & 12. A noise assessment and strategy would be required. Gas monitoring will inform a gas risk assessment report.</p> <p>During the construction phase, an increase in emissions is anticipated from additional HGV movements and the use of plant and equipment on site. The closest AQMA is located over 500m away from the site, however this has the potential to be affected by the additional traffic generation from the completed development.</p>
vi. archaeology	<p>See commentary against SA objective 14. An assessment has concluded that the archaeological potential of the site is considered to be fairly low.</p> <p>However, based upon evidence from the surrounding area, it is possible that remains of prehistoric, Roman or medieval date may be present. Crop mark evidence has recorded the presence of boundaries and enclosures to the south of Elvington Airfield. These are likely to represent agricultural field systems dating to the late prehistoric to Roman periods.</p>
vii. water drainage	<p>See commentary against SA objective 13. The site is required to adhere to policy regarding surface water management and the incorporation of SUDs.</p>

<p>Policy SS23/ST19</p> <p>Key Policy Requirements</p> <p>(See page 73, CD001)</p>	<p>Justification</p> <p>(For SA references see CD009B, SA Appendix I, pages 182-191)</p>
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<p>49,500sqm split approximately 40/60 B1a to B2/B8</p>	<p>Reflects the needs for B1, B2 & B8 uses. Updated Table 4.1 identifies requirements for the period 2021-2038 of:</p> <ul style="list-style-type: none"> • 149,898 (m2) Office (B1a) • 17,299 (m2) for Research & Development (B1b) • 12,653 (m2) for Light Industrial (B1c) • 70,691 (m2) for Storage and Distribution (B8)
<p>i. sustainable business park</p>	<p>See commentary against SA objective 4. The allocation would have a significant benefit for employment and economic growth, and it is considered that the range of uses proposed for this site (B1c/B2/B8) will not detract from the city centre and may offer expansion to existing uses on the business park.</p>
<p>ii. comprehensive scheme</p>	<p>Allocation extends the existing Business Park.</p>
<p>iii. access iv. sustainable transport linking to the Park & Ride. v. new pedestrian, cycle, public transport and vehicular routes</p>	<p>See commentary against SA objective 2 - increase in employment activities is likely to increase HGV and associated vehicle movements to and from the site. Enhancements to the road network may be necessary for the safety of workers.</p> <p>See commentary against SA objectives 6 & 7 - the size of the employment allocation is likely to generate additional car journeys and HGV movements, which could result in additional peak hour traffic follow onto the surrounding highway network. Additional impacts on the road network would require consideration and mitigation if necessary. The site is located in close proximity to the Poppleton Bar Park and Ride (Route 59) which is a frequent bus service to the city centre. The site is connected by cycle routes and has Poppleton train station within 1km of the allocation. Promotion of sustainable travel should be employed on site to minimise car trips using sustainable travel plans for new business, critical in influencing people's travel behaviour. The site has access to sustainable transport</p>

	modes and the uptake of these would impact on the scale of emissions from car travel.
vi. landscape scheme	See commentary against SA objective 15 - A landscape assessment is required to identify key receptors and appropriate mitigation. Existing mature hedgerows and vegetation to boundaries should be retained and enhanced to help mitigate adverse effects of development.
vii. residential amenity	See commentary against SA objective 2 – site may be subject to existing noise.
viii. archaeology	See commentary against SA objective 14 - Archaeological investigations are required

Q6.3 Is the allocation and associated Policy SS24 relating to ST37 soundly based?

6.3.1 The location of employment floorspace provision at allocation ST37 reflects existing planning consents. The site has been tested and assessed through the planning application process and a site masterplan agreed. The approved development approach minimises impacts on openness. Policy SS24 and strategic site allocation ST37 is soundly based:

- It positively contributes to meeting overall spatial strategy of the plan in providing for the proposed level of growth (650 jobs per annum); delivering the city's economic ambitions; providing for the assessed need for employment land and floorspace; and achieving sustainable development as it contributes to delivering the spatial strategy and has been subject to Sustainability Appraisal, see CD9b Appendix I)
- Is justified based on robust evidence, including the studies and information submitted with the planning applications, and from the Employment Land Review, in establishing employment land requirements
- Is deliverable over the period, planning applications have been submitted and consent achieved and further to this, ongoing checks with the promoter have confirmed availability and deliverability for employment use

- Is consistent with the economic role of planning (NPPF 2012), contributing to the achievement of sustainable development and building a strong, competitive economy/

6.3.2 Site-specific requirements are explained below.

Policy SS24/ST37 Key Policy Requirements (See page 74 C001)	Justification (See planning consents below & for SA references see CD009B, SA Appendix I, pages 291-292)
33,330sqm for B8	Reflects the needs for B8 use. Updated Table 4.1 identifies a 'Storage and Distribution B8' requirement of 70,691 (m2) for the period 2021-2038.
Agreed site masterplan	Development was initially approved in April 2017 (16/01446/OUTM) and then amended (18/01110/OUTM). Full planning permission was granted for the change of use of the 10ha site to a car storage facility, alterations to an existing access from Wigginton Road, the laying out of car parking across most of the site and the construction of other associated infrastructure. Outline planning permission was granted for a 2-storey office building, security gatehouse and associated infrastructure. A Site Masterplan was submitted with the original proposal.
Landscape & green wedge	<p>SA highlights the presence and importance of the Green Wedge in assessing objective SA15. The immediate area has a largely open character, and the allocation site forms part of a Green Wedge.</p> <p>The approved proposals and landscaping scheme for the site demonstrate that: storage areas can be screened, and planting can enhance the level of greenery; development can minimise impact on the openness of the site and its visibility in the landscape; and the important view to the Minster can be retained</p>

	and protected. The Masterplan includes a viewing corridor to York Minster.
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Q6.4 Where relevant, are the Green Belt boundaries of these sites reasonably derived?

6.4.1 For ease of reference, maps showing the Green Belt boundaries in question have been appended to this Statement in Appendix 1. The answers to Q6.1, Q6.2, and Q6.3 above provides clarity on why ST26, ST19 and ST37 were selected. In accordance with Strategic Principle 11 (p39), the identified sites cause the least harm to the primary purpose of the York Green Belt (purpose 4) and have regard to the sustainability objectives expressed through the Plan strategy.

6.4.2 Section 7 of the TP1 Green Belt Addendum 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.

6.4.3 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).

6.4.4 A clear and defensible Green Belt boundary has been defined for each site applying the boundary methodology set out in Section 8 of EX/CYC/59 and in accordance with Strategic Principles 12 and 13 (p39):

- 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.

6.4.5 The Green Belt boundaries for ST26 are described in Addendum Annex 4 EX/CYC/59f at pA4:112-113. ST26 is shown on pA4:109-110. ST26 is located to the south of Elvington Airfield business park adjoining the business park along the site's northern boundary. The northern boundary of ST26 consists of the extent of Brinkworth Rush woodland defined by woodland and tree lined hedgerow, the eastern boundary consists of a tree lined field boundary, the southern boundary consists of tree lined field boundaries, tracks and Brinkworth Rush (a road), and the western boundary consists of the curtilage of existing commercial properties. The boundaries therefore consist of field boundaries, tracks, a road, woodland, and the curtilage of existing development which represent recognisable and permanent features. There are no alternative boundaries which could provide greater permanence. The proposed boundary is sound.

6.4.5 The Green Belt boundaries for ST19 are described in Addendum Annex 4 EX/CYC/59f at pA4:192. ST19 is shown on pA4:190. ST19 is located to the south of Northminster Business Park adjoining the business park along the site's northern boundary. The eastern boundary of ST19 consists of North Field Lane, the southern boundary consists of Moor Lane (a track/bridleway), and the western boundary consists of field boundaries. The boundaries therefore consist of a field boundary, a track/bridleway and a road which represent recognisable and permanent features. There are no alternative boundaries which could provide greater permanence. The proposed boundary is sound.

6.4.6 The Green Belt boundaries for ST37 are described in Addendum Annex 3 EX/CYC/59c at pA3:296 (Section 4, Boundary 3). The eastern boundary of ST37 consists of Wigginton Road which represents the Green Belt boundary. This is a recognisable and permanent feature. The Green Belt boundary is sound. It should be noted that Section 4, Boundary 3 was modified from the boundary previously submitted in the City of York Local Plan (2018) in order to ensure consistency with the Green Belt methodology. The boundary previously followed the current defined edge of Clifton Moor Industrial Estate, and the modification extended the Green Belt

boundary further east to include ST37 within the urban area. This was modified due to the extant planning permission in place for a car storage development on this land which would alter the current limits of development extending this to Wigginton Road. The land would therefore not remain permanently open and the boundary was therefore modified. This justification is provided in Addendum Annex 3 EX/CYC/59c at pA3:295. There are no alternative boundaries which could provide greater permanence.