



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

**PHASE 3 HEARINGS**

**MATTER 8: NON-STRATEGIC HOUSING ALLOCATIONS**

**CITY OF YORK COUNCIL STATEMENT**

## **Matter 8 – Non-Strategic Housing Allocations**

### **8.1 Can the Council explain why these are referred to in the Plan (Table 5.1-H1, H3, H5, H6, H7, H8, H10, H20, H22, H23, H29, H31, H38, H39, H46, H52, H53, H55, H56, and H58) but not made subject of any site-specific policy?**

- 8.1.1 It is not necessary for these sites to be subject to site specific policy. The sites are deliberately distinguished from those that are strategic and integral to the Plan's overarching spatial strategy (as detailed at section 3 of the Plan).
- 8.1.2 The purpose of Policy H1 is to identify, through Table 5.1, the sites allocated for residential use and to give effect to the delineated sites shown on the policies map. It provides a clear starting point for decisionmakers, developers and communities, and provides an appropriate indication of the likely scale of development that each site will accommodate.
- 8.1.3 In practice, consideration should then turn to Policy DP3 which provides a set of overarching guiding development principles, that are expanded through more detailed policies governing specific topic matters. This staged approach to the appraisal/application of policies provides clear direction as to how a decision maker (and others) should consider a development proposal on each site.
- 8.1.4 Were the Plan to include site specific policies for non-strategic housing sites it would only repeat provisions found in other policies in the Plan and would be superfluous.

### **8.2 If their development is to be governed by general development control policies, is this sufficient?**

- 8.2.1 Yes. See response to 8.1 above and 8.4 below.

### **8.3 Are these sites deliverable?**

- 8.3.1 Yes. In accordance with the requirements of the NPPF and PPG<sup>1</sup>, the suitability, availability and achievability of sites have been duly considered throughout the preparation of the Plan. The development potential of each assessed site is included in the Council's Strategic Housing Land Availability Assessments [notably SD053 and SD049a-b].

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<sup>1</sup> PPG Housing and economic land availability assessment: Paragraph: 017 Reference ID: 3-017- 20190722

- 8.3.2 The impact of the Plan's policy requirements on the viability of sites has been a fundamental part of the Council's iterative plan making process. The whole plan viability work was updated in advance of Phase 2 hearings [HS/P2/M6/IR/1b(i)]. It applies a series of reasoned and justified assumptions to the calculations and demonstrates that residential sites of all categories can achieve full policy compliance, with some 'headroom' in values per dwelling.
- 8.3.3 Subsequently, the Council updated its housing trajectory [EX/CYC/76] and published additional information to confirm the deliverability of sites included in the five-year supply calculation [EX/CYC76a]. With the exception of two sites (discussed below), the non-strategic housing sites are expected to come forward within the next five years and meet the definition of deliverable in the NPPF (paragraph 47 and footnote 11).
- 8.3.4 H10 The Barbican is shown to be developable on the basis that the site has extant planning permission, but a revised scheme is currently subject to pre-application considerations. It should also be noted that H55 Land at Layerthorpe was identified as a deliverable site in the trajectory [EX/CYC/76]. However, it is clear from the evidence that there is uncertainty around the timescale for its disposal given current lease agreements on the site (which is Council owned). The site remains developable within the plan period, but should not be regarded as deliverable within the next five years.

#### **8.4 Are there any site-specific issues relating to any of them?**

- 8.4.1 The site assessment and selection process sought to ensure proposed allocations were free from significant constraints [as set out in SD049 , SD054 and SD018] and was supplemented by work undertaken as part of the Sustainably Appraisal.
- 8.4.2 It is recognised that the design and form of development on each non-strategic site will need to be informed by, and respond to, specific issues and opportunities. Assessments undertaken as part of the site selection process, identified areas of existing open space on sites and it was considered appropriate to include a relevant annotation in Table 5.1 of Policy H1 to acknowledge and highlight this. Proposed modification PM63 [EX/CYC/58] also introduces a reference to those sites that need to make additional provision for open space in accordance with policy G12 and new policy G12a. The modification responds to the potential for recreational impacts on Strensall Common Special Area of Conservation (SAC) as identified in the HRA (2020) [EX/CYC/45] and is also a justified inclusion in the table.

- 8.4.3 The issues related to open space have potential to impact on site capacity and the general approach to development on sites. For effectiveness and clarity, it is appropriate to identify affected sites and provide clear cross-referencing to the relevant detailed policies (G12, G12a and G16) as part of Policy H1.
- 8.4.4 Several sites will also require heritage impacts to be considered and addressed as part of development proposals. The Plan's Heritage Impact Assessment (HIA) [SD101] includes rapid appraisals for non-strategic sites and recommendations for bringing forward development in sensitive locations. The HIA forms part of the Plan's evidence base, and development proposals will be assessed in the context of the Plan as a whole, alongside supporting evidence such as this. It was therefore not considered necessary to reference heritage assets that might require consideration for each allocation. A modification is proposed to provide additional cross reference to plan policies DP3, DP1, D4 and D5 to aid clarity.

## **8.5 Where relevant, are the Green Belt boundaries of these sites reasonably derived?**

- 8.5.1 The following non-strategic housing allocations are located adjacent to the Green Belt boundary: H8, H29, H31 H38, H39, H46, H53. For ease, maps showing all of the Green Belt boundaries in question have been appended to this Statement as Appendix 1.
- 8.5.2 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.
- 8.5.3 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].

8.5.4 A clear and defensible Green Belt boundary has been defined around the non-strategic housing 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.

8.5.5 The Green Belt boundary for H8 (Askham Bar Park and Ride) is described in Annex 3 of the Green Belt Addendum EX/CYC/59e at pA3:927 (Section 8, Boundary 37). The western boundary of H8 represents the Green Belt boundary. The boundary in this location follows the East Coast Main Line which represents a recognisable and permanent feature. The proposed boundary is sound.

8.5.6 The Green Belt boundary for H29 (Land at Moor Lane, Copmanthorpe) is shown in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:30. As shown on pA4:32, H29 is located to the south of Copmanthorpe adjoining the settlement along the site's northern boundary. The eastern boundary of H29 consists of East Coast Main Line and the western boundary consists of Moor Lane. The boundaries therefore consist of a railway line and a road which represent recognisable and permanent features. The proposed boundary is sound.

8.5.7 The Green Belt boundary for H31 (Eastfield Lane, Dunnington) is shown in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:62. As shown on pA4:65, H31 is located to the north east of Dunnington adjoining the settlement along the site's western and southern

boundaries. The northern boundary of H31 consists of Eastfields Lane and the eastern boundary consists of a field boundary and a track (Peter Croft Lane). The boundaries therefore consist of a road, track and field boundary all of which represent recognisable and permanent features. The proposed boundary is sound.

- 8.5.8 The Green Belt boundary for H38 (Land RO Rufforth School, Rufforth) is shown in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:205. As shown on pA4:206, H38 is located to the north east of Rufforth adjoining the settlement along the site's south western boundary. The north eastern boundary of H38 consists of a field boundary which is a recognisable and permanent feature. The proposed boundary is sound.
- 8.5.9 The Green Belt boundary for H39 (North of Church lane, Elvington) is shown in Annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:95. As shown on A4:96, H39 is located to the south west of Elvington adjoining the settlement along the site's northern and eastern boundaries. The southern boundary consists of Church Lane which is a recognisable and permanent feature. The western boundary of H39 is not defined by any features on the ground and there are no alternative features which could be used (as stated on pA4:97). The assessment at pA4:98 acknowledges that a new recognisable and permanent western boundary to H39 would need to be created as part of the masterplanning of the site. The proposed boundary is sound.
- 8.5.10 The Green Belt boundary for H46 (old school playing field) is described in Annex 3 of the Green Belt Addendum EX/CYC/59d at pA3:406 (Section 5, Boundary 10). The boundary consists of a tree lined path and mature tree belt. These represent recognisable and permanent features. The proposed boundary is sound.
- 8.5.11 H53 in an infill site within Knapton village, which is proposed to be washed over by the Green Belt (annex 4 of the Green Belt Addendum EX/CYC/59f at pA4:344). No Green Belt boundaries are therefore proposed.