



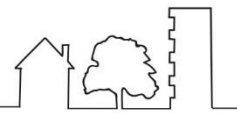
AIREDON
PLANNING & DESIGN

York Local Plan Examination

Phase 4: Matter 5 Statement

Mr J Harrison

August 2022



Matter 5 – Green Infrastructure

(Question 5.7) Is the approach of Policy GI6 to the provision of new open space sound?

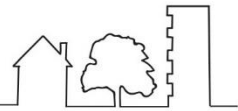
1. No, the approach to the provision of new open space is not sound.

Provision of off-site open space relating to strategic housing allocations

2. Policy GI6 of the Local Plan seeks to encourage on-site green infrastructure provision where possible with off-site provision being considered acceptable in a number of circumstances. One of those circumstances (Point iii) is on strategic sites, through strategic masterplanning agreements that provide for green infrastructure approaches which make accessible provision beyond allocated site boundaries.
3. It is considered that this policy is not clear enough. On strategic sites, such as ST14, it is considered that the strategic masterplanning stage should be undertaken at the earliest opportunity (i.e. at the Plan making stage) in order to understand the fundamentals of the site, its capacity and the feasibility of providing necessary elements such as essential green infrastructure. This need is only exacerbated by the identification of Green Belt surrounding ST14 in its entirety.
4. It is our understanding that the majority of green infrastructure associated with ST14 is proposed to be provided outside of the site allocation boundary and we are unaware of any strategic masterplanning agreement being in place to ensure such provision is made.
5. Furthermore, in the case of ST14, no assessment appears to have been made of the likely impact open space provision will have on the setting of the Green Belt, taking account of the purposes of including land within it.
6. It is therefore considered that Policy GI6 does not contain any substance and specifics that would ensure the suitability, deliverability and associated viability of providing open space outside of the strategic allocation boundaries. Furthermore, it also puts into question the suitability and deliverability of strategic housing allocations such as ST14.

New significant areas of open space in connection with strategic sites

7. Policy GI6 also identifies indicative new significant areas of open space in connection with strategic sites, which have been shown on the accompanying Proposals Map.



8. ST14 is the second largest housing allocation within the proposed Local Plan, however it has not been identified as a location for requiring an identified significant area of open space. This is despite the majority of open space associated with the site being located outside of the allocation boundary and within the Green Belt (with potential significant infrastructure such as drainage solutions that have not been assessed against Green Belt policy) as identified on the masterplan layouts submitted by the developers of ST14.

9. The site is currently greenfield, adjacent to existing plantations and has been identified as needing assessment moving forward in the context of its proximity to a European Designated Nature Conservation Site (Modification Reference Number: Policy H1: Housing Allocations in EX/CYC/93a: Phase 3 Proposed Modifications Schedule, July 2022). It is inevitable that the proposed allocation will require significant open space and green infrastructure provision moving forward, and this does not appear to have been accounted for when considering the locations of the new significant areas of open space designations.

10. There is a significant question mark over whether the additional land outside of the proposed allocation boundary (proposed by the developers as open space and green infrastructure provision) is deliverable, which is only highlighted by its apparent exclusion from the purchase price element of the site's viability assessment.