



City of York Council
West Offices
Station Rise
York
YO1 6GA

Date 6 September 2023

Letter of representation obo City of York Council

Re: Proposed Green Belt boundary changes EX/CYC/124 The Retreat and
EX/CYC/125 Askham Bryan Agricultural College

Dears Sirs

We write in response to your consultation of the 8 August 2023 in relation to proposed Green Belt boundary modifications.

EX/CYC/124 The Retreat

We refer you to the assessment of the site contained with EX/CYC/59e Topic Paper 1 Green Belt Addendum January 2021 Annex 3: Inner Boundaries (A3:720 onwards). This document applies the Council's methodology, as defined in EX/CYC/59 Topic Paper 1 Approach to defining York's Green Belt Addendum January 2021, to the proposed Green Belt boundaries. It is also noted that this boundary was discussed during the Phase 4 hearings (7 September 2022) where the Council's witness provided clarification on the boundary assessment.

A boundary similar to that now proposed under PMM40i is considered, and rejected, in EX/CYC/59e (A3:726) where it is noted that there is a strong historical and visual connection between the open character of Walmgate Stray and the situation and setting of The Retreat and its grounds. This open connection between the site and the Stray is recognised both in the Conservation Area designation, which notes the importance of the open landscape character and open greenspace on the edge of the City, and the Register of Historic Parks and Garden listing. The listing states:

'The northern part of the site forms one of the highest points on the east side of the city. The land slopes down to the south, enabling views over the grounds and south boundary wall to Walmgate Stray and wider landscape beyond. An open, semi-rural character is maintained by York Cemetery to the west (a Grade II registered park and garden), Walmgate Stray to the south (common land on which hereditary*

Freemen of the City have the right to graze cattle), and the landscaped campus of the University to the east. Samuel Tuke, William Tuke's grandson, described the prospect as 'extending, on the south, as far as the eye can reach, over a wooded, fertile plain; and terminating on the north and east, by the Hambleton Hills and the Wolds; which are seen, in some places, at the distance of about twenty-five miles' (William Tuke, 1813). This remains the case.'

The Conservation Area designation also notes the importance of the parkland setting of the listed buildings and the open character of the area. The open landscape character of the Conservation Area is noted as one of the main elements of the designation which extends from York Cemetery to the Stray and across to the University.

The Council's preferred boundary, as defined in PMM40, ensures that the important open character of the site is retained, building upon the undeveloped nature of Walmgate Stray and providing a more pronounced separation between the urban area and Green Belt. This particular point is further detailed in 'The approach to the Green Belt Appraisal' (SD107a) which provides further information on the importance of Green Wedges in preserving the character of the city. Green wedges are large tracts of undeveloped land which contain the compact urban form of the historic city and prevent coalescence. They provide separation between urban areas of different character and have helped shape local distinctiveness in York. The Retreat site (identified as Area C3: Extension to Walmgate Stray in SD107a) is identified as important for providing an open rural setting to the city and good views of the Minster. These views are particularly notable from the land in the North East of the site around Garrow House.

As well as the open character of the site, uses to the south and east of The Retreat buildings, and within the Council's proposed Green Belt, are all compatible with the Green Belt designation. To the South are gardens, sports pitches, sports pavilions and a small cemetery. There is also a small farm building complex associated with the historic mental asylum. To the East is a field and some larger buildings to the North, set in large open gardens. The field to the East, known as Daffodil Field, is particularly notable for its open rural character separated only from the wider Stray by a low post and rail fence and patchy hedge. As a result of this low impact boundary treatment, and the similarity in character with the Stray, this field appears seamlessly to blend with the wider Stray as can be seen in the photos (Viewpoints 8-10) in the Landscape Appraisal and Assessment of Openness submitted by Savills at the Phase 4 hearings and the photo below:



(Taken from university looking West towards Daffodil Field)

The proposed modification would fail to recognise the visual connections between this field, the adjacent strip of land and the Stray. Their rural and open character form an essential part of the setting of the listed buildings and clearly link visually with the Stray. The separation of these tracts of land from the Green Belt would not recognise the similarities in open character between them. It would also fail to protect the character of this part of the city by reducing the compactness of the city and harming the legibility of the historic city and its rural setting.

In summary, the NPPF (2012 Section 9; 2021 Section 13) defines the fundamental aim of Green Belt policy being to prevent urban sprawl by keeping land permanently open. Boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open. The proposed modification PMM40i proposes a Green Belt boundary which does not meet the Council's methodology as the land within The Retreat site is of an open character similar to that in the neighbouring Stray and with land uses appropriate to a Green Belt location. Removal of this land from the Green Belt risks eroding the open character and identified local distinctiveness of this part of the city.

EX/CYC/125 Askham Bryan Agricultural College

The Council has considered the proposed changes and accept that the use of highways to the north, east and south of the site gives permanence to the proposed Green Belt boundary. For this reason, no objections are raised to the proposed modification.

We respectfully ask that you note our comments, particularly those in relation to The Retreat boundary, and look forward to receiving your final report in due course.

Yours faithfully



Neil Ferris

Corporate Director of Place

References

Register of Historic Parks and Garden listing:

<https://historicengland.org.uk/listing/the-list/list-entry/1459114?section=official-list-entry>

Phase 4 hearings recording:

https://www.youtube.com/watch?v=jKARureB_OU&list=PLCefwpD2Fea2hQhdnL7T4EK7o0j1tyEUV&index=94 (approx. 1:04 into the recording)

City of York Approach to the Green Belt Appraisal (SD107a):

<https://www.york.gov.uk/downloads/file/2915/the-approach-to-the-green-belt-appraisal-2003->

Phase 4 Hearing Statement Savills obo The Retreat:

<https://www.york.gov.uk/downloads/file/8451/ex-hs-p4-m1-tp1-22-savills-obo-the-retreat>

Conservation Area designation: <https://her.york.gov.uk/Source/SYO1671>