



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

**PHASE 1 HEARINGS**

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**Matter 2 – The housing strategy**

**Spatial Distribution**

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**CITY OF YORK COUNCIL STATEMENT**

## The housing strategy: spatial distribution

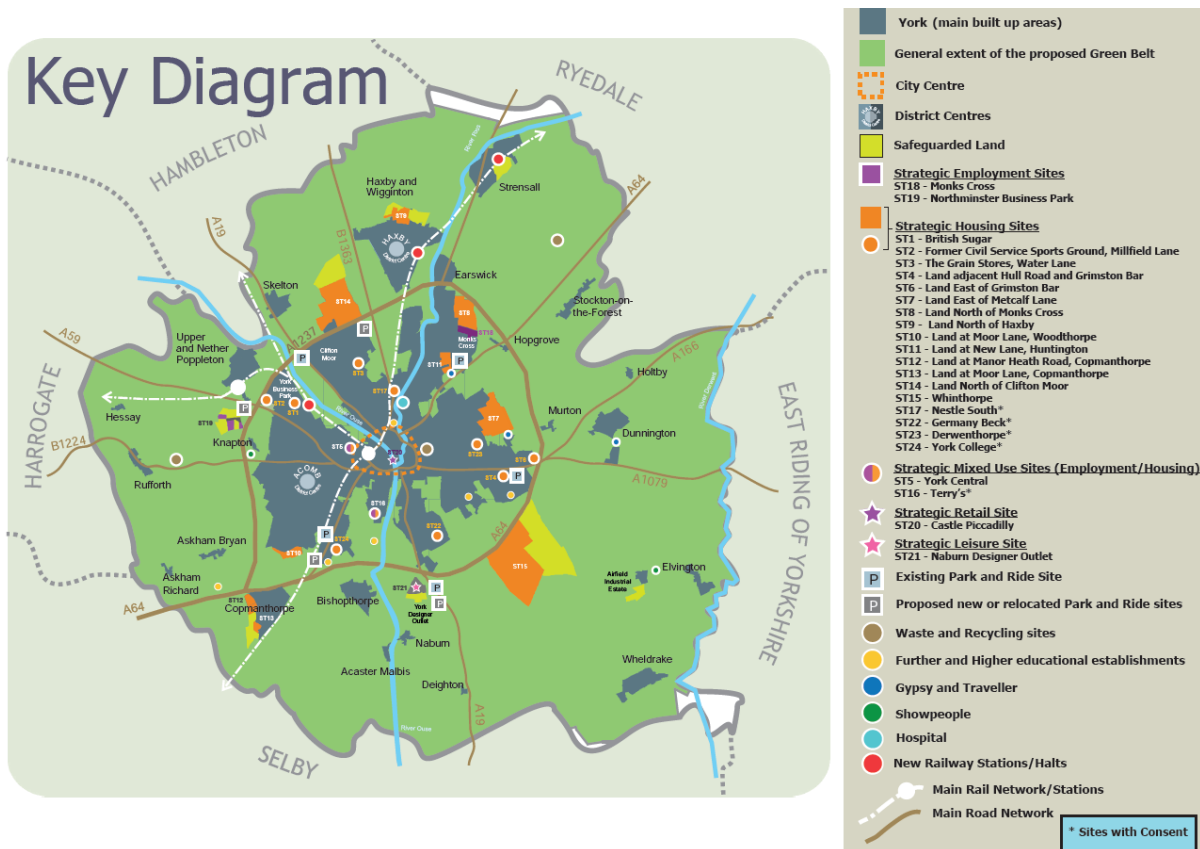
### **2.8 The Plan's development strategy is set out in Policy SS1. This provides five spatial principles to guide the location of development through the plan. In broad terms, is this the most appropriate spatial strategy?**

#### Response

- 2.8.1 Yes. The character and form of York provide an overarching narrative for the factors which shape the choices we have made and how we want to accommodate growth in York.
- 2.8.2 Policy SS1 draws upon the evidence base to use York's environmental factors and sustainability considerations to locate development in the most suitable areas. They have been refined as the plan has evolved.
- 2.8.3 The factors and considerations were set out in detail in pages 47 to 53 of the City of York Local Plan Preferred Options (June 2013) [SD005]. They are:
- The character and setting of the city;
  - Environmental assets – Nature Conservation, Green Corridors and Open space;
  - Flood Risk;
  - Location Sustainability; and
  - Settlement capacity.
- 2.8.4 The main attributes of the character and setting are a compact form surrounded by relatively small settlements, a flat terrain providing views of historic landmark features such as the Minster or Terry's Clock Tower; open land which brings the countryside into the city; and key arterial routes which influence urban form. The technical work (Historic Character and Setting Technical Paper 2011 [SD108], Update [SD106] and City of York Heritage Topic Paper [SD103] established that there were areas of land outside the existing built up areas which should be retained as open due to their role in preserving the historic character and setting of York including its relationship with surrounding settlements.
- 2.8.5 The factors and considerations were reflected in the four spatial principles identified in SS2 of the City of York Local Plan Preferred Options (June 2013) [SD005].
- Conserving and enhancing York's historic and natural environment. This includes the city's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function.

- Ensuring accessibility to sustainable modes of transport and a range of services.
- Preventing unacceptable levels of congestion, pollution and/or air quality.
- Ensuring flood risk is appropriately managed.

2.8.6 The location of development reflects the application of the environmental factors and sustainability principles which direct the pattern of development away from areas which need to be kept open and to areas with access to transport, services and facilities to align with the Plan’s vision. This resulted in a spatial strategy depicted in the key diagram in the Preferred Options Local Plan [SD005], as follows:



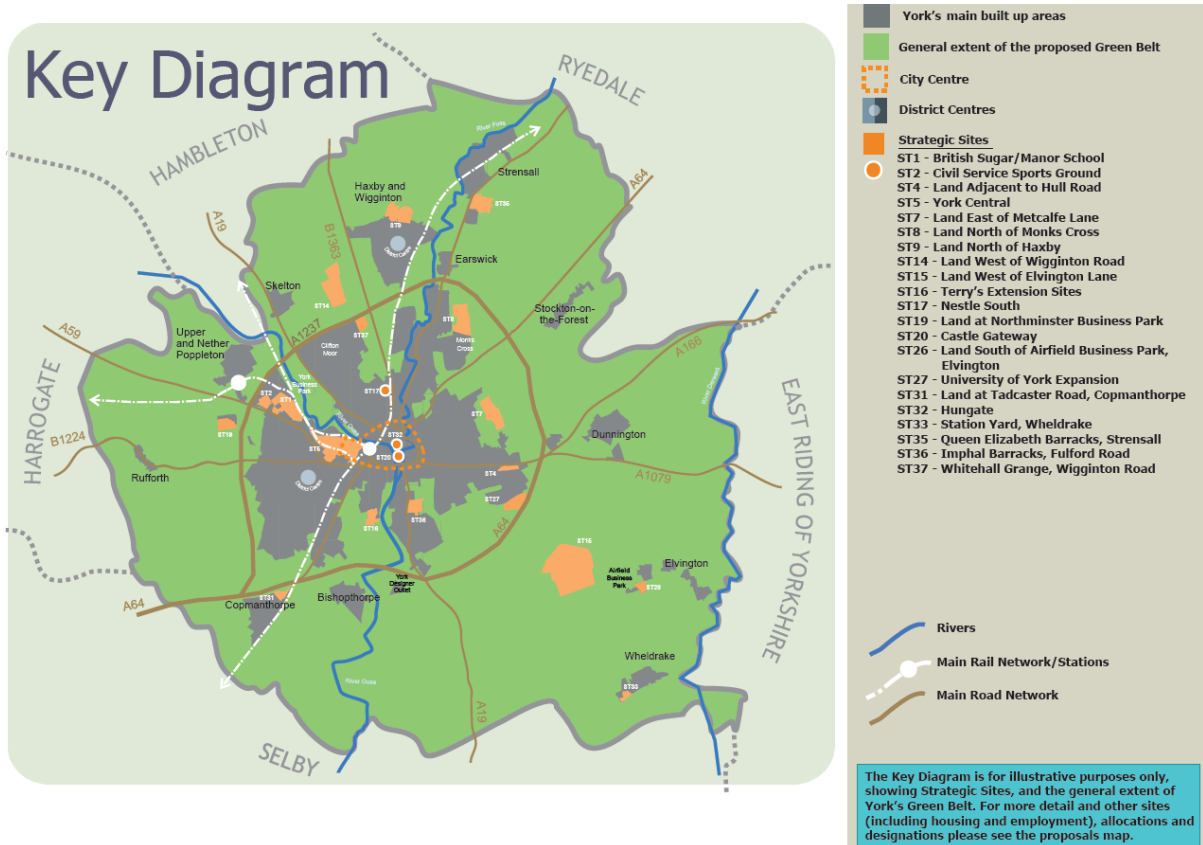
2.8.7 The development of the plan’s spatial principles and the spatial strategy has required consideration of the reasonable alternatives. Paragraphs 4.3.15 to 4.3.22 of the Local Plan Preferred Options Sustainability Appraisal (SA) [SD007a] present a summary of the findings of the SA with the detailed appraisal contained in Appendix 6 [SD007c]. None of the reasonable alternatives appraised as part of the SA were considered to perform better in sustainability terms, than the preferred approach. The following table presents the preferred approach and reasonable alternatives for the principles and spatial distribution.

Policy Area	Preferred Approach and Reasonable Alternatives
Factors which Shape Growth	<p><b>Preferred Approach</b></p> <ul style="list-style-type: none"> <li>• Option 3: Take a balanced approach to the identified spatial principles</li> </ul> <p><b>Alternatives</b></p> <ul style="list-style-type: none"> <li>• Option 1: Prioritise social and economic spatial principles</li> <li>• Option 2: Prioritise environmental spatial principles</li> <li>• Option 4: Prioritise viability and deliverability development</li> </ul>
Spatial Distribution	<p><b>Preferred Approach</b></p> <ul style="list-style-type: none"> <li>• Option 1: Prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement</li> </ul> <p><b>Alternatives</b></p> <ul style="list-style-type: none"> <li>• Option 2: Prioritise development within and/or as an extension to the urban area and through provision in the villages subject to levels of services</li> <li>• Option 3: Prioritise development within and/or as an extension to the urban area and through the provision of new settlements</li> <li>• Option 4: Prioritise development within and/or as an extension to the urban area along key sustainable transport corridors</li> </ul>

- 2.8.8 The spatial principles and spatial strategy in the submitted Publication version [CD001] have evolved as a result of consultation and updated evidence base informing officers understanding since the preparation of the Local Plan Preferred Options (June 2013) [SD005].
- 2.8.9 Technical work has included an Open Space and Green Infrastructure Report and Update [SD086A and SD085] which identified other areas to be kept open due to their nature conservation and recreational value. A Strategic Flood Risk Assessment [SD091] ensured flood risk has been taken into account to ensure that new development is not affected by, or does not contribute to, unacceptable levels of risk. The progressive application of this to identifying areas to remain open is shown in Figures 3.1-3 of the draft Plan [CD001].
- 2.8.10 The application of the spatial principles to the sites gives detailed expression of the spatial strategy. In consequence, their application has also been informed by site specific evidence in relation to York’s designated nature conservation sites and the perception of development to the historic character and setting of York through the Heritage Topic Paper and Impact Assessment as well as site visits with Historic England to further understand harm from proposed allocations.
- 2.8.11 The Preferred Sites Consultation (2016) [SD018] documented a change in the Council’s approach to the identified site allocations fundamental to delivering the spatial strategy; safeguarded land was no longer identified and additional criteria/ evidence, such as Heritage Impact Appraisals (HIA), were used to

inform the refinement of site boundaries previously included at the aborted Publication draft Local Plan (2014) stage.

2.8.12 The resulting evolution of the spatial strategy is reflected in the key diagram submitted in the Local Plan [CD001], as follows:



2.8.13 Predominantly, the sites comprising the original preferred spatial strategy (2013) remain but some have been changed or removed following consultation in 2016 on preferred sites [SD018] and 2017 (on the Pre-Publication Draft [SD021]) and to reflect that some sites have been consented for development or built out. Notably, the site allocation boundaries fundamental to delivering the spatial strategy have evolved over time, principally to respond to site specific evidence and to help to safeguard the size and compact nature of the historic city, the perception of York being a free-standing historic city set within a rural hinterland, key views towards York from the ring road, and the relationship of the main built up area of York to its surrounding settlements. In this regard, Historic England commented at the Preferred Sites Consultation (2016) [CD013M] and reiterated at the Publication (Regulation 19) Consultation [CD013A; CD014C (SID118)] stage that *“It appears evident that the size of these settlements and their location do not threaten the individual identity or rural setting of their neighbouring villages, the green wedges that penetrates into the urban area and important views from the ring road has been designed to take account of the relationship which York has with its existing surrounding villages – an*

*element which has been identified in the Heritage Topic Paper Update as being part of the character of the City*". Evidence has also been used to refine the strategic allocations within the spatial strategy to ensure that harm to designated nature conservation assets is avoided.

- 2.8.14 The plan also seeks to avoid an unconstrained increase in traffic and so supports a pattern of development which favours the use of sustainable transport to minimise the growth in traffic.
- 2.8.15 The strategy has also recognised the primary purpose of the Green Belt in this location, which is to safeguard the special character of York. The Plan defines inner and outer boundaries for the Green Belt for the first time, but also recognises that there is a need for new development to take place within the general extent of the Green Belt whilst taking account of the other spatial principles identified above.
- 2.8.16 This approach is in conformity with core land-use principles (paragraph 17) in the NPPF (2012) which seeks to provide sufficient land which is suitable for development in sustainable locations that provide multiple benefits, conserve and enhance the natural environment, conserve heritage assets and which *"take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside"*.
- 2.8.17 Section 2 of the SA Publication Draft Regulation 19 Consultation [CD008] explains the process of the development of the preferred approach alongside the rejection of alternatives. Appendix I to this SA Report [CD009B] sets out an individual evaluation of the strategic sites against reasonable alternative boundaries and sites. Subsequent SA addendums [CD011 and EX/CYC/24] further evaluate any changes resulting from the use of updated evidence base and subsequent proposed modifications to policies and strategic sites. In this regard, the SA contributes towards demonstrating that the approach is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate and updated evidence. The SA has therefore supported the evolution of the spatial strategy.

**2.9 Policy SS1 says that the location of development will be guided by the five spatial principles. However, the Plan strategy does not quantify the spatial distribution of new housing across the Plan area.**

- a) **What is the overall distribution of new housing proposed through the Plan? Should it be clearer in this regard? Does the Key Diagram provide sufficient illustration of the broad distribution of new housing across the Plan Area?**

Response

2.9.1 The Local Plan has focussed on identifying sufficient allocations to meet housing and economic growth (spatial drivers) in a pattern of development aligned to the factors which shape growth ('spatial shapers') set out in policy SS1. As set out above, this has involved focussing development in the main urban area, with some urban extensions as well as the establishment of new settlements which preserve the historic character of York and its relationship with its hinterland and existing settlement pattern. This is shown on the Key Diagram set out above. This has culminated in the identification of 20 strategic site allocations and 26 general allocations overall, of which 15 strategic sites ("ST") and 20 general sites are allocated specifically for housing ("H") (including ST5 'York Central' for mixed use). The distribution of new housing is in locations that adhere to the spatial strategy and clearly shows development in the main urban area (ST1 (policy SS6), ST2 (policy SS7), ST4(policy SS8), ST5 (policy SS4), ST16 (policy SS14), ST17 (policy SS15), ST20 (policy SS5), ST32 (SS17), ST36 (policy SS20)), selective urban extensions (ST8 (policy SS10) and ST9 (policy SS11) and stand alone settlements (ST7 (policy SS9), ST14 (policy SS12) and ST15 (policy SS13).

2.9.2 The plan allocates 12,819 dwellings in strategic allocations and 1,452 dwellings in general housing allocations across the city to meet its required development need. Tables 1 categorises the strategic and general housing allocations and unimplemented consents included in the updated housing trajectory [EX/CYC/16] by location across the city in line with the spatial strategy.

Table 1 – Housing Distribution as submitted in revised Figure 6 from SHLAA [EX/CYC/16]

	York's main urban area	Urban Extension	Village/ Rural	New Settlement	Totals
H Allocations	1219	0	233	0	1452
ST Allocations	5246	1703	338	5532	12819
<b>Totals</b>	<b>6465</b>	<b>1703</b>	<b>571</b>	<b>5532</b>	<b>14271</b>
<b>Percentage %</b>	<b>45.30%</b>	<b>11.93%</b>	<b>4.00%</b>	<b>38.76%</b>	
Unimplemented Consents	3407	0	171	0	3578
<b>Grand Total</b>	<b>9872</b>	<b>1703</b>	<b>742</b>	<b>5532</b>	<b>17849</b>
<b>Percentage %</b>	<b>55.31%</b>	<b>9.54%</b>	<b>4.16%</b>	<b>30.99%</b>	

NB: Housing number are taken from updated Figure 6 of the SHLAA (base date 01.04.17) [EX/CYC/16].

- 2.9.3 The spatial principles and spatial strategy in the submitted Publication version [CD001] have evolved as a result of consultation and updated evidence base informing officers understanding since the preparation of the Local Plan Preferred Options (June 2013) [SD005]. It can be seen that the majority of development is still directed to the main urban area and urban extensions (64.9%), with around 30% to new settlements.
- 2.9.4 The Key Diagram broadly illustrates this distribution of key elements of the growth strategy. Principally it illustrates the strategic allocations, which are fundamentally required to deliver the spatial strategy and green belt. In addition, the diagram illustrates the existing main urban area, villages and strategic road/rail infrastructure for context. It does not include detail pertaining to smaller site allocations or other land use allocations; where applicable, these are demonstrated in detail on the Policies Map [CD004].
- 2.9.5 The detail in the key diagram is considered appropriate as it illustrates the fundamental elements for York's spatial Strategy including the strategic allocations which represent 89.7% of housing to be delivered by the plan.

**b) What level of new housing is directed towards the city centre and other parts of the Plan Area?**

2.9.6 Please see answer 2.9a and Table 1.

**c) How has this distribution been arrived at and what is the justification for it?**

- 2.9.7 The spatial principles set out in policy SS1 formed the basis for the broad spatial strategy, as well as the basis of the site selection methodology used in the Strategic Housing Land Availability Assessment [SD0049] to identify suitable sites for development.
- 2.9.8 Section 2.3 of the SHLAA [SD0049A] sets out the 2-stage process followed; Stage 1 was a GIS based criteria based location assessment and Stage 2 was a Technical Officer Assessment. In line with the NPPF, submitted land with a willing landowner over a size threshold of 0.2ha were assessed; sites below this threshold are identified as windfalls.
- 2.9.9 Stage 1 of the methodology uses the spatial shapers set out in policy SS1 in a four part criteria assessment to ensure development is focussed in the most suitable and sustainable locations in York whilst respecting the city's unique assets and maximising access to services and sustainable transport routes. This methodology was also informed by work on the Sustainability Appraisal



(SA), which sets an appraisal methodology to assess whether the Local Plan fits with sustainability aspirations both nationally and locally.

- 2.9.10 A minimum site score threshold based on access to essential services and transport was applied to criteria 4. Sites over 35 hectares were anticipated to be capable of providing facilities and transport connections. Given this assumption, where these sites do not pass the site scoring, they were still taken forward for consideration by technical officers.
- 2.9.11 The sites which successfully passed stage 1 of the suitability assessment are considered as alternatives (for the purposes of Sustainability Appraisal). These sites were taken to a Technical Officer Group consisting of experts from around the Council to understand more site specific suitability and determine whether the site should progress as a potential development site.
- 2.9.12 Appendix K to the SA (2018) [CD009C] sets out an audit trail of decision making for all of the sites which passed criteria 1 to 4 in the site selection process, including those which were considered reasonable but were not chosen as allocations. This acknowledges that between Pre-Publication consultation 2017 and Publication 2018 the list of reasonable sites was subject to further technical officer analysis which included updates to availability and deliverability, analysis of further evidence in relation to show stoppers and technical officer comments.
- 2.9.13 The results of this assessment work were then carried into the proposed allocations and the distribution of development set out above. This assessment work was clearly linked to the spatial shapers which had informed the broad spatial strategy.

**d) Is the distribution consistent with the overall approach set out in Policy SS1?**

2.9.14 Yes; see answers to 2.7 and 2.9c

**e) Is the distribution of housing supported by the SA and will it lead to the most sustainable pattern of housing growth?**

- 2.9.15 Yes. The distribution of housing has been supported by SA.
- 2.9.16 Section 2 of the SA Publication Draft Regulation 19 Consultation [CD008] and specifically Tables 2.2, 2.3, 2.4, and 2.13 summarise the approach, appraisal and consultation responses to the development of the spatial strategy.
- 2.9.17 Table 4.3 of the Local Plan Preferred Options SA [SD007a] presents the preferred spatial strategy and reasonable alternatives. Paragraphs 4.3.15 to

4.3.22 of the report [SD007a] present a summary of the findings with the detailed appraisal contained in Appendix 6 [SD007c]. The preferred spatial strategy has then been brought forward (with refinement) for each subsequent stage of the plan.

2.9.18 With regard to the factors that shape growth, four alternatives were considered and appraised:

- Option 1: prioritise the socio-economic spatial principles;
- Option 2: prioritise the environmental principles;
- Option 3: take a balanced approach to the identified spatial principles; and
- Option 4: prioritise viability and deliverability.

2.9.19 The option ‘taking a balanced approach’ was taken forward as the preferred option. This continued to use the Spatial Shapers as outlined through the Core Strategy Process, amended to reflect the evidence base and reflected in SS1 as the spatial principles. This ensured that York’s growth was allocated in a way that:

- recognises character and setting of York including the role of centres and the relationship between York and its surrounding settlements;
- conserves and enhances York’s special historic and natural environment;
- protects York’s Green Infrastructure;
- minimises flood risk.; and
- mitigates against climate change through locating development in the most sustainable locations.

2.9.20 These factors along with the evidence base were used to develop the options for the spatial distribution of growth considered in the Local Plan Preferred Options SA [SD007a]:

- Option 1: Prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement;
- Option 2: Prioritise development within and/or as an extension to the urban area and through provision in the villages subject to levels of services;
- Option 3: Prioritise development within and/or as an extension to the urban area and through the provision of new settlements;
- Option 4: Prioritise development within and/or as an extension to the urban area along key sustainable transport corridors.

- 2.9.21 At Local Plan Preferred Options stage, Option 1 was taken forward as none of the reasonable alternatives appraised as part of the SA were considered to perform better in sustainability terms, than the preferred option. To meet this requirement 24 strategic sites (including 1 new settlement) were identified along with 45 housing allocations and 13 employment allocations.
- 2.9.22 Paragraphs 4.3.15 to 4.3.22 of the report [SD007a] present a summary of the findings with the detailed appraisal contained in Appendix 6 [SD007c].
- 2.9.23 The preferred spatial strategy has then been brought forward for each subsequent stage of the plan. Section 2 of the SA Publication Draft Regulation 19 Consultation [CD008] and specifically Tables 2.2, 2.3, 2.4, and 2.13 summarise the approach, appraisal and consultation responses.
- 2.9.24 Predominantly, the sites comprising the original preferred spatial strategy (2013) remain but some have been changed or removed following consultation in 2016 on preferred sites [SD018] and 2017 (on the Pre-Publication Draft [SD021]) and to reflect that some sites have been consented for development or built out. Notably, the site allocation boundaries fundamental to delivering the spatial strategy have evolved over time, principally to respond to site specific evidence and to help to safeguard the size and compact nature of the historic city.
- 2.9.25 Section 6.5 of the SA Pre-Publication Draft Regulation 18 Consultation (Sep 2017) [SD023A] outlined the approach to developing the spatial strategy, noting that whilst the approach has been refined and updated to reflect evidence and site information, the broad pattern of future growth has largely remained. Paragraphs 6.5.3 to 6.5.17 of report [SD023A] summarises the findings of the appraisal of the spatial strategy by appraising those policies concerning the quantum and location of development (Policies SS1 to SS24). Paragraphs 6.5.18 to 6.5.53 of report [SD023A] presents the summary of the appraisal of the strategic sites and other allocations that give expression to the refined spatial strategy.
- 2.9.26 The overall spatial strategy presented in the Local Plan Publication Draft is further refined and evolved taking into account site information. Paragraphs 6.5.2 to 6.5.4 of the SA Publication Draft Regulation 19 Consultation [CD008] notes that whilst the policies have been updated to reflect new evidence and consultation response, the thrust of the spatial strategy remains the same as previously presented. The detailed changes were reflected in the revised site allocations: 21 strategic sites, 23 housing allocations, 7 employment sites, 1 student housing site and 1 Travelling Showpeople site. Paragraphs 6.5.5 to 6.5.19 of the report [CD008] summarises the findings of the appraisal of the spatial strategy. Paragraphs 6.5.20 to 6.5.58 of the report [CD008] presents the summary of the appraisal of the strategic sites and other allocations.

2.9.27 As also noted in paragraph 7.1.5 of the SA Publication Draft Regulation 19 Consultation [CD008], the significant growth proposed “...*particularly where this is associated with strategic sites will however, also have negative effects across a number of SA Objectives*” (which have included effects on SA Objective 8 ‘Biodiversity’). In this regard, following updates to the evidence base, the Council proposed a number of modifications to the draft Local Plan. The proposed modifications included the deletion of a strategic site (ST35) and general housing site (H59) following the conclusions of the Habitats Regulations Assessment<sup>1</sup> and the need to avoid to avoid adverse effects on the integrity of the Strensall Common SAC. Section 5.4 of the SA Report Addendum – Proposed Modifications Consultation [EX/CYC/24a] summarises these changes, their appraisal and the implications for the preferred spatial strategy and delivery of the revised housing requirement. This has resulted in the identification of 20 strategic site allocations and 26 general allocations overall.

2.9.28 In consequence, the development of the spatial distribution of housing and the reasonable alternatives have been considered and updated in the SA as the plan has developed. Changes have been made to avoid adverse effects on European sites whilst maintaining an alignment with key spatial principles. In this regard, the SA contributes towards demonstrating that the approach is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate and updated evidence.

f) **Has the Green Belt and/or any other constraints influenced the distribution of housing and, if so, how?**

2.9.29 Yes; the spatial distribution of housing in York has been influenced by the purposes of Green Belt, along with other constraints

2.9.30 The spatial distribution of housing is based upon the factors which shape growth included within Policy SS1. These are based on what the Council regards as justified constraints on development, including nature conservation designations and flood risk areas. The site selection methodology set out in the SHLAA (2018) [SD049B] uses the spatial principles which have been informed by these constraints to select the most suitable and sustainable sites for development.

2.9.31 The factors which shape growth are also used as part of the methodology to inform the assessment of York’s Green Belt in the Green Belt Topic Paper [TP001] and Addendum [EX/CYC/18].

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<sup>1</sup> Waterman Infrastructure & Environment Limited for City of York Council (February 2019) *Habitats Regulations Assessment of the City of York Council Local Plan* (EX/CYC/14c)

- 2.9.32 Section 4.4 of the Green Belt Topic Paper [TP001] highlights the alignment between the methodology underpinning the spatial distribution of housing, in particular the need to keep areas of land open and undeveloped and assessment of the green belt. Table 1 (page 24) illustrates how each of the site selection principles, which stem from the Policy SS1, have taken into account. The linkage between the principles and factors influencing green belt openness and purposes is detailed in full against in section 4 of the Green Belt Paper Addendum [EX/CYC/18]. In addition, Section 5c of the Addendum details how these criteria have been used in identifying openness at the strategic and local level.
- 2.9.33 The alignment of these methodologies has meant that the spatial distribution is directed away from areas considered important to be kept permanently open and is directed to less sensitive areas. A key factor in this is the primary purpose of the Green Belt, which is to protect the special character and appearance of York and its relationship with the surrounding area including its settlement form. This has had a clear influence on the spatial strategy and therefore the distribution of development, for reasons explained above. This approach has enabled policy to minimise harm to the special character and setting of the city.
- 2.9.34 The HRA process (as per Matter 1, Q1.10-1.11) has influenced the distribution through evaluating the impacts on the Natura 2000 framework. Where adverse effects on the integrity cannot be ruled out, the Council has sought to rectify this through amendments to policy and the removal of sites.

**2.10 Overall, is the spatial distribution of housing justified and is the Plan sound in this regard?**

- 2.10.1 The Council is satisfied based upon the answers to questions 2.8 and 2.9 that approach to spatial distribution is justified and sound. This is further demonstrated in the City of York Local Plan Soundness Checklist (2018) [CD023] which was submitted alongside the Plan.