

Matter 4 - Spatial Strategy and Site Selection Process

Made on behalf of York Housing Association, Karbon Homes Ltd, & Karbon Developments

Spatial Strategy

Question 4.1

Is the Spatial Strategy set out in the Plan based on an appropriate and reasonable assessment and justified by robust evidence?

- 1.1 The Spatial Strategy is based on the 'drivers' of economic and housing growth and on other material factors which the Council term 'shapers'. The policy suggests that these shapers have influenced where development should and should not be directed.
- 1.2 We have the following concerns:
- The Council's ambitions for jobs growth is not reflected in the housing requirement;
 - That the housing requirement does not adequately address the housing needs of the district and affordable housing crisis in York;
 - The individual site capacity assessments do not reflect the requirement to provide a biodiversity net gain, which some developers may choose to provide on-site rather than as a contribution;
 - The evidence base, particularly relating to such matters as economic growth and flood risk is now dated and therefore may not be robust;
 - The apparent lack of documentation supporting the transport shapers; and
 - The application of the shapers relating to York's historic and natural environment.

Question 4.2

Is the approach taken in informing the Spatial Strategy and the distribution of development across the Plan area justified, effective and in accordance with national policy?

- 1.3 Unlike most Spatial Strategies, the Council do not set out a clear distribution strategy. The strategy appears to be based on where development is least constrained rather than positive directional guidance.
- 1.4 The Spatial Strategy is defined in the Sustainability Appraisal as "prioritising development within and/or as an extension to the urban area and through the provision of new settlements". This does not appear to be reflected in text of the spatial strategy of the Plan although the practical

implications appear in the Plan’s vision and development principles section. The Plan would benefit from such a clear statement in the spatial strategy section.

- 1.5 The Plan has a very loose Spatial Strategy which has allowed the Council to justify the choice of sites and in locations of their choosing rather than based on clear spatial criteria, such as settlement size. We do not object to this, but the Council’s thinking is not particularly clear, and hinders a person’s understanding of why a particular site has been allocated.
- 1.6 Further, we note that the spatial strategy has resulted in a number of very large sites. All Councils need large sites and we do not object to this approach, as we recognise that these sites will provide growth in the medium and long term. However, these sites are unlikely to provide growth in the short term. The proportion of large sites compared to the small sites is shown in **Table 1** below.

Type of Allocation	Total of Allocations	Total Area (ha.)	Proportion of Housing Land Allocated by Size	Proposed Estimated Yield	Proportion of Total Estimated Yield
‘H’ Housing Allocations	21	32.31	6%	1,497	9.99%
‘ST’ Strategic Housing Allocations	16	494.54	94%	13,488	90.01%
Total	37	526.85	100%	14,985	100%

Table 1 - Proportion of Dwellings Estimated to be Provided by 'H' and 'ST' Allocations

- 1.7 We note that paragraph 69 of the NPPF 2021 states that:
- “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.”*
- 1.8 The key word here is ‘quickly’. In the midst of a national housing crisis and with York suffering more acutely than any other city in the north of England, we consider that it is essential that there are plentiful supply of small and medium sized allocations across the city so as to begin to remedy this situation as quickly as possible.
- 1.9 It is also important for the Council to identify a robust range of small and medium sized sites to ensure that a 5-year housing land supply can be delivered in the early years of the plan period and maintained thereafter.
- 1.10 Previous iterations of the Plan identified numerous small and medium sized sites, including H26, H28, ST13 and ST29 which are plainly suitable housing sites (as they are reasonable alternatives).

Question 4.3

Does Policy SS1 provide an appropriate basis for the delivery of sustainable development and growth within the City of York?

- 1.11 Policy SS1 is entitled sustainable growth and the policy itself sets out priorities for delivery and is intended to deliver sustainable growth.
- 1.12 We note that the Plan seeks to deliver a number of ‘Garden Villages’. We have no objection to the allocation of Garden Villages per se, but we note that the size of these Garden Villages has been reduced considerably over time (as illustrated by **Figure 1** below). The key to providing sustainable growth in these Garden Villages is size as size equates to facilities and services. If a Garden Village is too small essential services and facilities do not get provided and residents have to drive to access such services as doctors’ surgeries, dentists, schools and other services and facilities including places of employment.

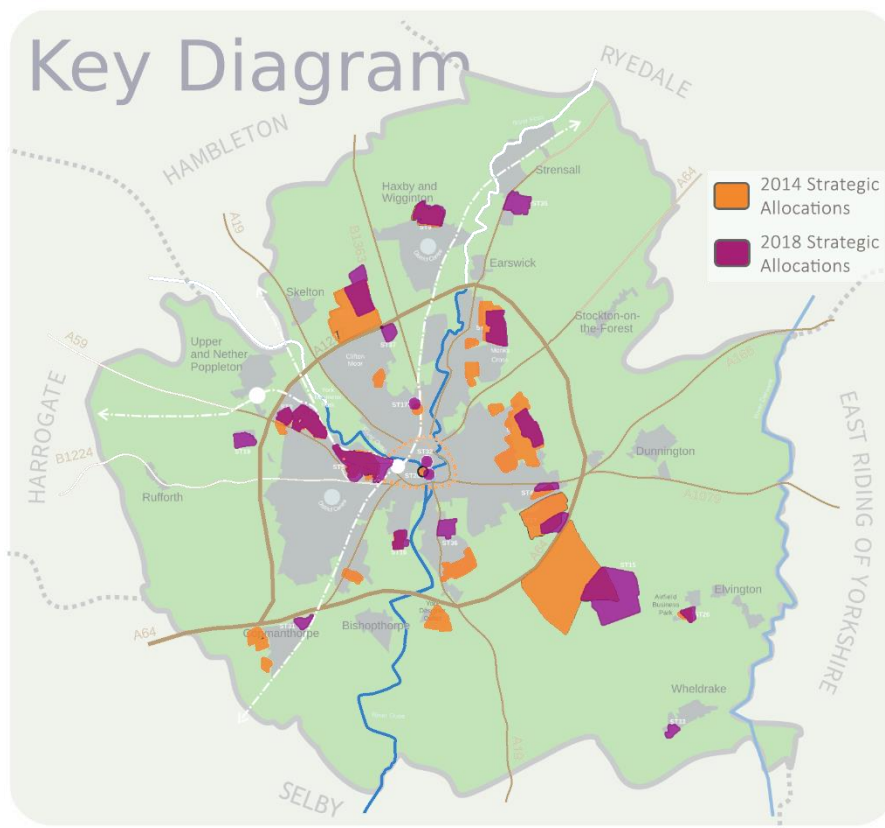


Figure 1 –2014 and 2018 Plan Allocations Overlaid

- 1.13 Table 2 below illustrates when services and facilities are likely to be deliverable. This table indicates that ST14, in particular, may only be able to deliver a primary school and a local shop. However, to be truly sustainable a Garden Village would need to be considerably larger than ST14.

	Illustrative catchment populations	Approximate number of homes (based on 2.4 people / home)
Nursery/ first school	2,000	830
Primary/ middle school (2-form entry)	4,000	1,660
Secondary school	8,000	3,330
Secondary school (large)	16,000	6,670
Health centre	10,000	4,170
Doctor's surgery	4,000	1,660
Pharmacy	5,000	2,080
Local shop	1,500	625
Pub	6,000	2,500
Post office	5,000	2,080
Library	12,000-30,000	5,000-12,500
Church	9,000	3,750
Community centre	4,000	1,670
Local centre	6,000	2,500
District centre	24,000	10,000
Leisure centre	24,000	10,000

Table 2 - Catchment Thresholds for Neighbourhood Services/Amenities

(Source: Compiled from Shaping Neighbourhoods: For Local Health and Global Sustainability (2010); Urban Design Compendium - Homes and Communities Agency (2000) and Approaching Urban Design: The Design Process, (2001))

- 1.14 We do not object to the principle of Green Villages, but we consider that these Garden Villages need to be of a sufficient size to provide sustainable growth.

Question 4.4

Policy SS1 sets out a spatial principle for sustainable modes of transport and Paragraph 3.12 of the submitted Plan says support will be provided for a pattern of development that favours and facilitates the use of more sustainable transport to minimise the future growth of traffic.

a) How does the Plan deliver this?

b) What evidence is there that the Spatial Strategy delivers what Paragraph 3.12 of the submitted Plan says?

c) Is it the most appropriate strategy when assessed against alternatives?

- 1.15 In the justification for Policy SS1, at paragraph 3.12, the Council refer to avoiding development that leads to an unconstrained increase in traffic. In this regard the Plan indicates that it will support a pattern of development that favours and facilitates the use of more sustainable transport to minimise the future growth in traffic.
- 1.16 We note that the policy is lacking a clear strategy or structure to direct the distribution of development effectively. The objective and purpose of the policy does not appear to have been consistently reflected in the Plan.
- 1.17 By way of example, based on the objective of Policy SS1, transportation is clearly an essential component of the strategy. Travel by train is a real alternative means of travel to the use of the private car and travel by train avoids congestion. Very few settlements in the district benefit from the proximity of a railway station except ST1, ST2 and ST5 and the planned station in Haxby which will benefit ST9. See **Figure 2** below.

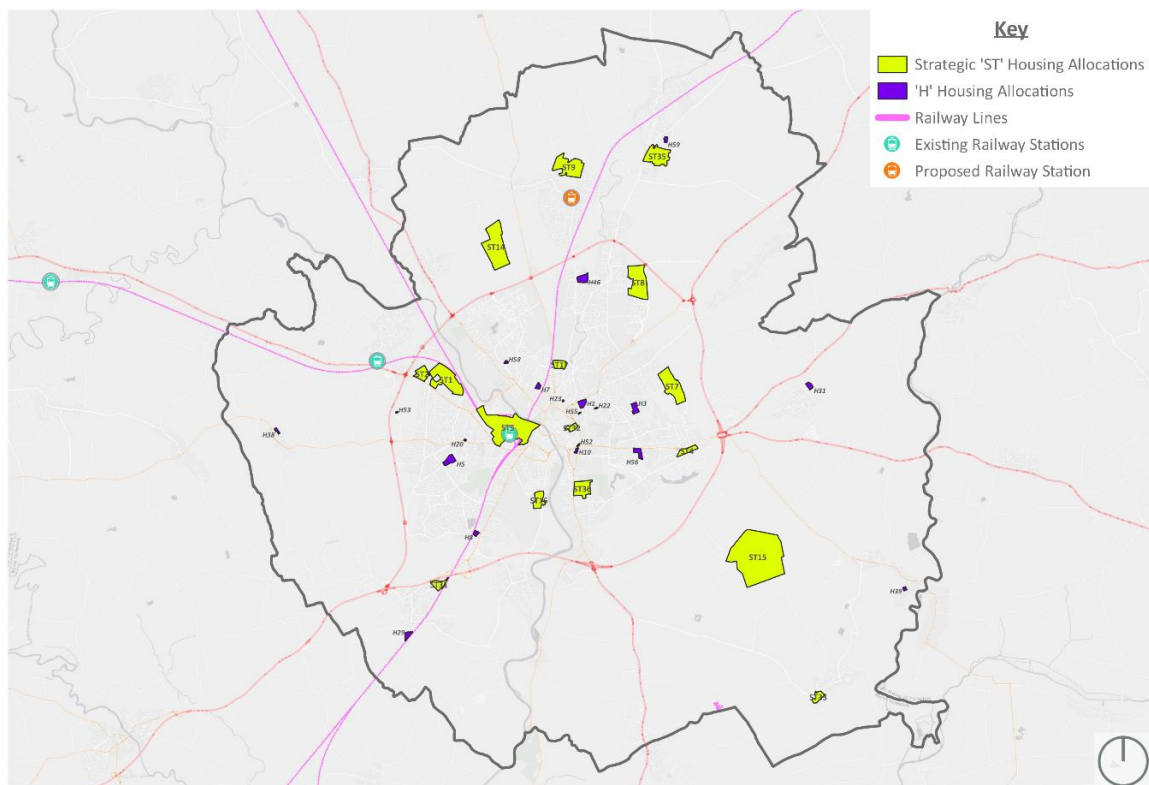


Figure 2 - Housing Allocations in Relation to Train Infrastructure

- 1.18 Turning to the Garden Villages, it is immediately evident that none will be served by existing rail links. This is perhaps not surprising.
- 1.19 However, it is important to recognise that the Garden Villages will not have any new public transport infrastructure, at least in a short-to-medium-term, and even if it materialises, they might be very limited. It is not unreasonable to assume that all of the Garden Villages will be reliant upon new or redirected bus routes and the private car. This will undoubtedly lead to increased car-dependency and a subsequent increased demand on the highway network, worsening congestion.

Question 4.5

Is the proposed approach to new development and its location, as outlined by Policy SS1, sufficiently clear within the submitted Plan and is it supported by a robust and up to date evidence base?

- 1.20 We understand the concept of the drivers and shapers but there is no distribution strategy in respect of the allocations per se. It is a policy based on perceived constraints rather than positive direction.
- 1.21 Further, the Policy's justification is accompanied by a series of maps outlining the land affected by the Council's shapers. These provide a visual representation of land constraints. However,

there is no such accompanying map to guide development in terms of accessibility. This is somewhat confusing and does not help in the interpretation of Policy SS1.

- 1.22 Indeed, If the Council's intention was to promote development well served by existing public transport links and accessibility to key services and amenities, we question whether this has been reflected in the Council's choice of allocations. A good example of a rejected highly sustainable site is ST29 and the deleted safeguarded land around Haxby.

Spatial Distribution of Development

Question 4.6

Are the (broad) locations for new development the most appropriate locations when considered against all reasonable alternatives?

- 1.23 Over the years that the Plan has been in preparation the Council have allocated a number of housing allocations but as the Council have pushed the housing requirement down these allocations have been deleted. These include H26, H28, ST13 and ST29. These are clearly reasonable alternative allocations as the Council plainly considered that it was acceptable to remove these sites from the general extent of the Green Belt. Even if these sites performed a Green Belt role it was clearly considered by the Council that the need to meet the housing requirement outweighed the harm to Green Belt purposes.
- 1.24 If the Inspectors find that the housing requirement needs to be increased or that any of the allocations proposed within the Plan no longer accord with the Spatial Strategy or do not compromise sustainable growth, then it is clear that all of the sites which were previously allocated should be reconsidered.

Question 4.8

Are the factors which shape growth, as set out in Section 3 of the Plan, clearly explained, justified and set out and are they supported by robust and up to date evidence?

- 1.25 Several of the shapers are clearly explained but we have issues how this is interpreted when it comes to determining the actual Green Belt boundaries. We further note that viability and deliverability issues is not explained at all and even if it was, we are struggling to see how this matter relates to the formulation of a spatial strategy. We accept that this is important in identifying land for development, but it should not form part of a spatial strategy.

Question 4.9

With regard to the impact of distribution of development on the transport network:

- a) *What role has the transport appraisal had in influencing the distribution of development?*
- b) *Is the Council's transport evidence robust and adequately up to date?*

c) What are the cumulative impacts on the transport network of the spatial distribution of development set out in the Plan and are any adverse impacts severe? If so, how has that been addressed?

- 1.26 We can find no reference to the Transport Appraisal in the Plan and it is not mentioned as a source of evidence in the factors that shape growth section of the spatial strategy despite transport clearly being highlighted as one of four major considerations for the distribution of development.
- 1.27 There are a number of transportation documents listed on the Council's website. These include the [SD076 - Transport Topic Paper \(2018\)](#) and [SD079 - Transport Implications of the Local Plan Preferred Options \(2013\)](#) which presumably have informed the distribution of development in some form. We are unable to discern how they may have shaped distribution since, as mentioned already, we find no reference to these documents in the Plan.

Question 4.10

What role has the Sustainability Appraisal had in influencing the distribution of development?

- 1.28 The Planning Advisor Service published a note entitled good plan making. This indicates that the Sustainability Appraisal Report must show how the sustainability appraisal has informed the local plan and that the Sustainability Appraisal needs to explain how a plan has developed, been refined and options chosen and articulated.
- 1.29 We have undertaken a comparison of some of the existing strategic 'ST' allocations and 'H' housing allocations with the reasonable alternatives and present our workings in **Appendix 1** of our response to Matter 4. Overall, our analysis suggests that certain of the reasonable alternative sites scored more favourably than some allocated sites highlighted in our analysis.
- 1.30 We draw the Inspector's attention in particular to the comparison of ST13 and ST29 (both deleted) and ST37 (a new allocation).
- 1.31 Comparison of ST37 (the most recently added allocation) with deleted reasonable alternatives clearly demonstrates that its sustainability score is inferior to those sites.
- 1.32 Having conducted the same exercise in respect of the smaller housing sites (see **Table 2** in **Appendix 1** of our response to Matter 5), it is evident that sites such as H26 have been disregarded despite scoring much higher than sites brought forward such as H53 and H39. H26 was considered to be likely to cause significantly positive sustainability impacts in two categories (compared with zero categories for H53 and H39). Similarly, with regard to H26 there is only one recorded a likely significantly negative impact (in just one category) compared with two categories of likely severe negative impacts each for H53 and H39.
- 1.33 It is therefore unclear what, if any, the Sustainability Appraisal has influenced the identification of allocations and the distribution strategy.

Site selection process

Question 4.11

With regard to the sites proposed for all types of development (i.e. housing and non-housing):

- *How have the sites been identified, assessed and selected?*
- *Is the methodology used for each justified?*
- *What role has the Sustainability Appraisal had in this process?*
- *Have any site size thresholds been applied in the site selection process? If so, what, how and why?*

1.34 All of the sites put forward were assessed against a detailed site assessment methodology. As a technical exercise we have no concerns about the process or methodology. However, we do have some concerns about how the sites were re-assessed following the Council's reduction of the housing requirement.

1.35 For example, Site ref: H26 was removed by the Council. The justification is provided in the Preferred Sites Consultation Further:

'The site is not considered to be well contained and would result in the existing urban form of Elvington village coalescing with the commercial area at Elvington Industrial Estate. The site is therefore considered to perform greenbelt purposes.'

1.36 Not only does this assessment contradict with the earlier assessment provided by the Council but is clearly not accurate. A brief assessment of the H26 would demonstrate that the site is in fact very well contained, and its contribution to the Green Belt reduced as a result.

1.37 H26 has not been included as an allocation within the Plan, despite the site-specific assessment provided by officers confirming that the site is sustainable, deliverable, and only made a limited contribution to the Green Belt.

1.38 We have serious concerns with the application of the Sustainability Appraisal in relation to the spatial strategy and the selection of allocated sites and how the final iteration of allocations was arrived at.

Question 4.12

How has the Council taken into account Green Belt issues in the site selection process? In particular:

- *has the openness of the sites considered, and the degree to which that openness contributes to the fundamental aim of Green Belt policy (preventing urban sprawl by keeping land permanently open), been taken into account?*
- *has the degree to which land does or does not serve the purposes of including land in the Green Belt been an influencing factor?*

- *have any reasonable alternative sites been rejected on the basis that the Council considered that it could not demonstrate the ‘exceptional circumstances’ it considered necessary to justify including the site in the supply? If so, in the light of our views concerning ‘exceptional circumstances’ (which is set out in our letter dated 12 June 2020 (EX/INS/15)), is that a problem?*
- 1.39 We are not convinced that the contribution of land to the Green Belt has been properly considered as part of the site selection process. Each of the sites assessed in the Sustainability Appraisal are measured against 15 objectives. The 14th objective, *to conserve or enhance York’s historic environment, cultural heritage, character and setting*, and the 15th objective, *to protect and enhance York’s natural and built landscape* provides a means by which the Council have assessed the sustainability of sites having regard to matters that are nominally related to the Green Belt. Sites therefore may have been selected on the grounds that the Council consider them to be sustainable, but this may not have been balanced against the harm, or otherwise, to the purposes of including land within the Green Belt.
- 1.40 The aborted Local Plan Publication Draft (2014) included a portfolio of housing and employment sites which were supported by a Site Selection report. These sites were selected using the methodology set out in the Site Selection Report (2014) which was based on the plans spatial strategy. The sites had all been tested against the site selection methodology which is based on a 4 stage criteria-based approach as follows:
- *Criteria 1: Protecting environmental assets*
 - *Criteria 2: Protecting existing openspace*
 - *Criteria 3: Avoiding areas of high flood risk*
 - *Criteria 4a: Sustainable access to facilities and services and Criteria 4b: Sustainable access to transport.*
- 1.41 Table 1 within the [TP1 Approach to defining York’s Green Belt \(2018\)](#) details which of the assessment criteria are relevant to each of the purposes of the Green Belt through the use of the four listed criteria. We are not convinced that the use of the criteria provided the Council with a robust means to assess the contribution of various sites and land to the purposes of Green Belt. The Council fail to explain how this has allowed a robust assessment of Green Belt at the outset of the site selection process.
- 1.42 The [Preferred Sites Consultation \(July 2016\)](#) confirms that any sites which passed criteria 1-4 were discussed with relevant technical officers for more detailed consideration regarding their potential for development. The sites were then again underwent a process of *Updated Technical Officer Comments* as part of the Stage 2 Methodology. As part of this process, a Green Belt Appraisal was undertaken. In the *commentary* section of the individual site assessments within this document include very few references to the openness of sites within the Green Belt. However, issues such as flood risk status, and Agricultural Land Zone have been systematically

considered as part of each technical assessment. One doesn't get the impression that the openness of the Green Belt was thoroughly considered as part of each site assessment.

Question 4.13

Have any other factors come forward - or steps been taken - since the sites identified in the Plan were selected which would exclude any sites from inclusion in the Plan for any particular reason? If so, what and why?

1.43 No comment.

Conclusion

1.44 We can find no explicit justification for the overall Spatial Strategy. The strategy should be clearly set out in the Plan.

1.45 In relation to the Sustainability Appraisal exercise this appears to not have been consistently applied. Further, the Sustainability Appraisal has insufficient regard for Green Belt considerations.

1.46 We also have concerns about the robustness of the evidence base which is mostly approaching 10 years old and in particular we are concerned that viability is regarded as a Shaper.

1.47 We accept that there is a need for large sites, including the proposed Garden Villages, but large sites cannot be delivered quickly and there is a need to boost housing delivery in York.

1.48 Given the size of some off the Garden Villages we are also far from convinced that these represent the most sustainable development option, particularly with regard to congestion on the highway network.

1.49 We are not convinced that the plan has been positively prepared, is justified, will be effective or is compliant with national policy.

Modification

1.50 To make the Plan sound the spatial strategy needs to be made clear, the evidence base needs amending/updating and additional land needs allocating for housing development in sustainable locations

Appendix 1 – Comparison of Allocated Sites’ and Deleted Allocations’ Sustainability Appraisal Scores

Table 1 - Comparison of ST37 and Deleted ‘ST’ Allocations’ Sustainability Appraisal Scores

Allocation Reference	Objective:/ Site Name:	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5: Equality & Accessibility / SAO6: Transport	SAO6: Transport †	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste†	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
ST13*	Land at Moor Lane, Copmanthorpe	++	++	+	0	+		+	0	-	0		0	0	0	0
ST29*	South of Boroughbridge Road	++	+	+	0	++		+	0	-	-		0	0	-	-
ST30*	Open Pastureland, North of Stockton Lane	++	+	+	0	+		+	0	-	-		0	0	-	-
ST37	Whitehall Grange	0	0	-	+	++	0	-	-	-	-	-	-	0	-	-

* = deleted allocation.

† - in the latest [2019 Sustainability Appraisal](#) the deleted allocations receive a merged score for ‘Equality and Accessibility’ and ‘Transport’ (SAO5 and SAO6) and no score for ‘waste’ (SAO11).

Table 2 - Comparison of H53 and H39 with Deleted 'H' Allocations' Sustainability Appraisal Scores

Allocation Reference	Objective:/ Site Name:	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5: Equality & Accessibility / SAO6: Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
H26*	Land at Dauby Lane, Elvington, York	++	++	+	0		+	-	-	0		0	0	0	0
H34*	North Lane Skelton	+	++	-	0	+	+	-	++	0		0	0	0	0
H53	Land at Main Street, Knapton	+	+	-	0	+	0	0	-	0		0	0	0	0
H39	North of Church lane Elvington	+	+	+	0	+	+	-	-	0		0	0	0	0

* = deleted allocation.