

YORK

CITY OF YORK
LOCAL PLAN
Strategic Housing Land
Availability Assessment (SHLAA)
September 2017

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Note:

The inclusion of sites within this study should not be taken to imply that the Council would consider planning applications favourably. Although it will inform housing allocations, it will not determine the allocation of land for housing development. It will also not prevent sites being brought forward or allocated for purposes other than residential development. All future planning applications will be considered individually and will be assessed through policies in the most up to date development plan.

1 INTRODUCTION

1.1 Purpose of this report

- 1.1.1 The aim of the Strategic Housing Land Availability Assessment (SHLAA) is to ensure that there is an informed understanding of the likely availability of land for housing within York over the Local Plan period (15 years). This document supersedes previous versions to present the sites assessed for their development potential to form part of the evidence base for York's Local Plan.
- 1.1.2 This report accompanies the Pre-Publication Local Plan for consultation setting out the methodology for site selection in the plan and detail of which sites have been allocated. Further work on the SHLAA and site selection will be informed by the Pre-Publication Consultation responses and presented in due course.

1.2 Strategic Housing Land Availability Assessment

- 1.2.1 The key function of a SHLAA is to:

Identify sites with potential for housing;

Assess their potential for housing; and

Assess when they are likely to be developed.

- 1.2.2 A two stage suitability assessment was undertaken to firstly determine the reasonable alternatives to be considered and secondly to identify the sites which have the most potential for development.
- 1.2.3 This SHLAA provides a comprehensive evidence base for York's Local Plan concerning the suitability, availability and achievability of potential housing land. It identifies potential housing land, and provides a detailed assessment of it, but **does not** make decisions about which sites should be developed. Instead the SHLAA will be used to support decision making about future land allocations and does not pre-judge the strategic approach that the York Local Plan will take. It is for the development plan itself to determine which of the sites are most suitable for allocation. It should also be noted that the information provided in this document is not binding on any future recommendation that may be made by the Council through the planning process.

- 1.2.4 The results from this report have been used to inform the Local Plan process and identify potential allocations.
- 1.2.5 The following report outlines the planning context, details the chosen methodology and demonstrates the Council's potential housing supply.
- 1.2.6 This report will be periodically updated to reflect monitoring and receipt of potential sites for development.

1.3 Planning Context

National Planning Policy Framework

- 1.3.1 The National Planning Policy Framework (NPPF) sets the planning policies for England and how these are expected to be applied. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities¹.
- 1.3.2 Section 6 of the NPPF "Delivering a wide choice of high quality homes" specifically sets out the requirement to boost the supply of housing. It identifies that Local Planning Authorities should identify the need for housing, key sites critical to the delivery of the housing strategy and deliverable sites sufficient to meet 15 years of supply. It also requires consideration for locally appropriate housing density and that viability of development is understood.
- 1.3.3 The following paragraphs set out the statements most relevant to this SHLAA:

Para 47²:

To boost significantly the supply of housing, local planning authorities should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable¹¹ sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure

¹ Paragraph 1, National Planning Framework (2012)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

² Paragraph 47, National Planning Policy Framework (2012)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;

- identify a supply of specific, developable¹² sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- set out their own approach to housing density to reflect local circumstances.

Para 52:

The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

Para 154:

Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where.

Para 157:

Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;

Para 158:

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

Para 159:

Establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

Para 173:

Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

Para 174:

Assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.

Para 177:

It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.

Flood Risk Sequential Test

- 1.3.4 Paragraphs 100-104 of NPPF set out a sequential, risk based approach to the location of development to avoid people and property being exposed to the risk of flooding and to manage any residual risk. An important step in the sequential approach to flood risk is the application of a sequential test to proposals for development in areas at risk of flooding, which examines whether there are alternative sites less at risk of flooding that would be appropriate for the proposed development.
- 1.3.5 If, following the Sequential test, the council considers that there are no reasonably available sites in areas less at risk of flooding that would be appropriate for the proposed development, then the Sequential test is passed. It may be appropriate for the proposed development to proceed subject to a site-specific flood risk assessment and appropriate mitigation measures to ensure

that the development is made safe for its lifetime without increasing flood risk elsewhere.

- 1.3.6 The National Planning Practice Guidance (NPPG) builds upon the guidance in the NPPF. Paragraph 018 (Reference ID: 7-018-20140306) sets out the sequential, risk based approach to the location of development. It states that the aim should be to keep development out of medium and high flood risk areas (flood zones 2 and 3) and other areas affected by other sources of flooding where possible.
- 1.3.7 Paragraph 019 (Reference ID: 7-019-20140306) sets out the aim of the sequential test. It states that the flood zones as defined in the Strategic Flood Risk Assessment (SFRA) provide the basis for applying the test. The aim is to steer new development to flood risk 1 (areas with a low probability of river or sea flooding). Where there are no reasonably available sites in flood zone 1, local planning authorities in their decision making should take into account the flood risk vulnerability of land uses and consider reasonably available sites in flood zone 2 (areas with a medium probability of river or sea flooding), applying the exception test if required.

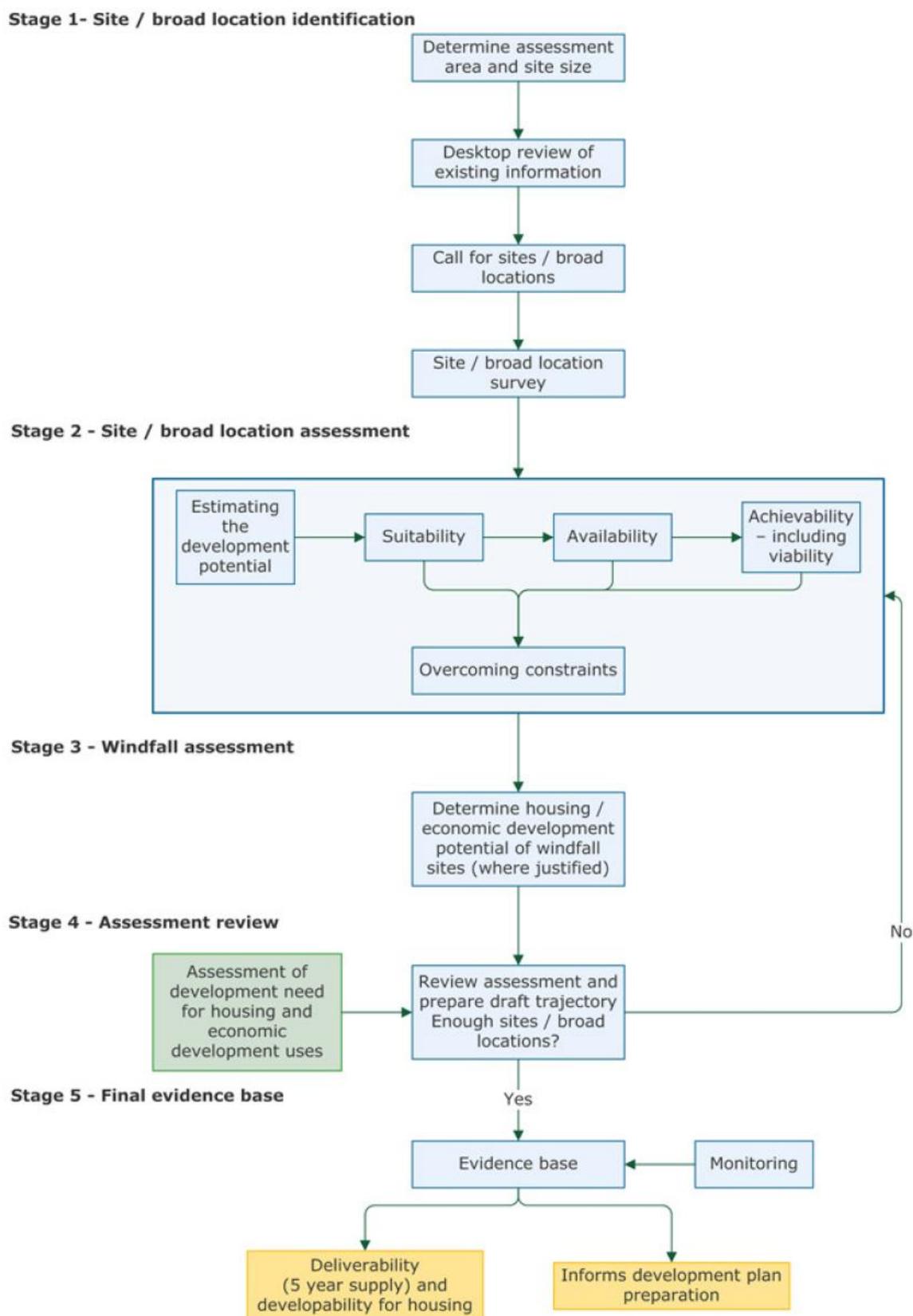
National Planning Practice Guidance

- 1.3.8 The NPPG provides further guidance on preparing Housing Land availability assessments. This clarifies that the purpose of an assessment of land availability should identify a future supply of land which is suitable, available and achievable for housing development use over the plan period.
- 1.3.9 The NPPG proposes a staged methodology for undertaking the assessment as per Figure 1. Plan-makers are required to have regard to this methodology in preparing their SHLAA to ensure a robust assessment is undertaken. The approach taken by City of York Council conforms to this process. For ease, and comparability, this is set out in the Table 1.

Table 1: Compliance with NPPG methodology

NPPG Methodology	Draft SHLAA
Stage 1: Site / Broad location identification	Section 2: Methodology
Stage 2: Site / Broad location assessment Estimating the development potential Suitability Availability Achievability/viability Overcoming constraints.	Section 2: Methodology Section 3: Housing Supply and Annexes
Stage 3: Windfall assessment (where justified)	Annex 5: Windfall Paper
Stage 4: Assessment Review	Section 3: Housing Supply
Stage 5: Final evidence base	Future report and monitoring regime

Figure 1: National Planning practice Guidance Methodology Flow Diagram



Source: National Planning Practice Guidance, Housing and Economic Land Availability Assessment. <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/methodology-flow-chart/>

1.4 Local Context

York's Local Plan

- 1.4.1 The production of the emerging Local Plan started in 2012 using previous work undertaken for the development of the Core Strategy as a baseline to move forward. The objective of the new Local Plan was to include Strategic policies and development management policies alongside strategic and other sites allocations to meet the development needs of the city.
- 1.4.2 The Local Plan Preferred Options went out for public consultation in summer 2013 with accompanying evidence base. This included a Site Selection Paper detailing the sites which has passed our criteria and technical officer assessment. Further site submissions were received as part of this consultation and therefore a Further Sites Consultation was held in June 2014 setting out our assessment of sites. See section 2.2 for more information on Local Plan consultation and engagement.
- 1.4.3 A Local Plan Publication draft was approved for consultation in September 2014 by Members at Local Plan Working Group and Executive. However, this consultation was halted following a decision at Full Council in October 2014 to pursue further work in relation to housing numbers.
- 1.4.4 In July 2016 the Council held a Preferred Sites Consultation (PSC)³ that set out the revised housing and employment requirements as well as the portfolio of sites to meet the identified need.
- 1.4.5 The Ministry of Defence announced as part of its Defence Estate Strategy on 7th November 2016 the release of 3 sites in York:
- Imphal Barracks, Fulford Road
 - Queen Elizabeth Barracks, Strensall
 - Towthorpe Lines, Strensall
- 1.4.6 The outcome from the 2016 consultation and the new sites identified by the MOD are considered as part of this technical document.
- 1.4.7 Previous work has been undertaken relating to the SHLAA in both 2008 and 2011. In addition the Council has released a Strategic Housing Market Assessments (SHMA) (2016, updated 2017). These documents are available on the Council's website via <http://www.york.gov.uk/localplan>.

³ https://www.york.gov.uk/downloads/download/3333/local_plan_preferred_sites_consultation_documents

2 METHODOLOGY

2.1 Developing our Approach to Site Selection

- 2.1.1 The site selection process is iterative and draws on both general and site specific evidence. It is a resource intensive process which requires careful management to ensure the right balance is struck between the level of detail required to make effective choices and losing sight of the choices to be made through the process being overwhelmed with detail. This is described in NPPF as taking a proportionate approach.
- 2.1.2 The iterative process has allowed several stages of site identification and consultation to take place and enabled feedback on the methodology and (re)appraisal of each site. The same sieving process has been used throughout to ensure that all sites taken forward for further consideration have been subject to an equal level of scrutiny, whether they are retesting existing proposals or testing a new proposal which have arisen from consultation. As a result of this, site identification has followed an extensive consultation and engagement process as well as a rigorous assessment of sites.

Geographical Scope

- 2.1.3 The SHLAA considers land within the York Local Authority boundary. Although the Government's Localism agenda promotes collaborative approach under 'duty-to-cooperate', it would be out of York's control to influence allocations in neighbouring authorities. The decision was therefore made to retain the authority boundary as the basis for identifying sites.

2.2 Stages of Site Identification and Consultation/Engagement

- 2.2.1 The SHLAA is essentially a database of sites which have been assessment for their potential for housing. As part of the process to identify sites, we have undertaken a number of stages of consultation through which land has been submitted to be considered for its potential for development purposes. The following sources of supply have been considered:
- Site submitted through the "Call for Sites" consultation and subsequent Local Plan consultations;
 - Extant Housing and Employment planning permissions;
 - Former allocations which have not been developed out.

Call for sites Consultation (2012)

- 2.2.2 The Council did an initial 'Call for Sites' in 2008, which was refreshed in 2012. The 2012 'Call for Sites' consultation asked landowners, developers, agents and the public to submit sites which they thought had potential for development over the next 15-20 years. The consultation ran from 29th August to 12th October

2012 and required a response form and OS map to be submitted to gain consistent information for each site regarding its suitability, availability and deliverability.

- 2.2.3 There were nearly 300 individual site submissions during the consultation period to be considered for a range of development purposes.

Preferred Options Consultation (2013)

- 2.2.4 The Site Selection Paper (SSP) ⁴was published alongside the Local Plan Preferred Options for consultation in summer 2013. The SSP published the results of the analysis of sites submitted through the Call for Sites consultation (2012) and previously identified sources. In total, analysis for 732 parcels was presented.
- 2.2.5 In response to the Preferred Options we received comments on both sites identified as having potential for development as well as those which were rejected. In addition, we received alternative parcels of land as well as further evidence and requests for boundary changes to allocated sites in the Preferred Options document. To ensure consistency, all newly submitted sites were taken through the same methodology to identify their potential for development purposes. In addition, the boundary changes and evidence received on all sites has been reviewed and, where applicable, taken back to Technical Officers to for a further response.

Strategic Sites Delivery Framework (2013)

- 2.2.6 Following the Preferred Options consultation it was recognised that further information was required for Strategic Sites in order to achieve the requirements of the NPPF in relation to viability and deliverability. A framework was devised for the Council to work with developers/landowners, which sets out key milestones leading up to the submission of the Local Plan for examination and the proportionate evidence base that is required to prove that the site should be contained within the Plan.
- 2.2.7 The level of detail required by the checklist is influenced by when the site will be delivered – for sites proposed for delivery within the first five years, confidence on delivery will need to be greater. The framework intended to give a general understanding of what we will need by when and assist the Council during plan preparation to ensure there is a robust evidence base to support the Local Plan.
- 2.2.8 This framework was presented by the Local Plan Working Group on 4th November 2013 and agreed as an approach for taking forward Strategic Sites.

⁴ Site Selection Paper:

https://www.york.gov.uk/downloads/download/1197/local_plan_preferred_options_supporting_documents

Strategic Site Framework	Stage 1	Stage 2	Stage 3	Stage 4
	<p>Confirming the principle</p> <p>We need a general understanding of what your site will deliver and for you to confirm that this site should be included within the plan.</p> <p>We need to know that the landowner/developer is willing</p>	<p>Review</p> <p>We need to have confidence that the site can stay in the Local Plan.</p> <p>We need to understand and agree when the site can potentially be delivered</p> <p>We need to know how any 'showstoppers' can be dealt with</p>	<p>Pre-submission</p> <p>Where the site is to be delivered early on in the plan period, we will need to know the site is deliverable and viable. In other cases, we will need to know how we will work towards delivery</p> <p>We need to know when and what you are going to deliver</p>	<p>Submission and beyond</p> <p>We need you to submit your evidence to prove deliverability. For early deliverable sites we will need to demonstrate site viability and for others, an indication of what issues are outstanding</p> <p>Preparation of an outline application / early delivery</p>
<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ Set out the vision and aims for your site ✓ Explain the relationship to the Local Plan Vision ✓ Confirm that the Landowner/ developer is proved to be willing and working together for delivery ✓ Demonstrate you are aware of any Potential 'showstoppers' or critical issues affecting deliverability, inc. viability ✓ Set out potential levels and timescale of delivery; i.e. indicative numbers, phasing, density 	<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ Likely trajectory for delivery inc. phasing and delivery ✓ An understanding of general, key infrastructure requirements for the site ✓ An understanding of key constraints and potential 'showstoppers' and critical issues ✓ Addressing issues raised through Local Plan Preferred Options Consultation 	<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ 'Showstoppers' are capable of being addressed within the timescales set out for delivery ✓ Delivery trajectory and phasing is understood ✓ Where sites are coming forward early in the plan period: <ul style="list-style-type: none"> ○ An indication of high level viability. ○ An indicative concept plan ✓ For sites proposing delivery later in the period: we will need a general 'route map' to delivery of how key issues will be addressed 	<p>Checklist for this stage:</p> <ul style="list-style-type: none"> ✓ Evidence to include: <ul style="list-style-type: none"> ○ Aims and objectives ○ Identification and mitigation of show-stoppers ○ Land-uses and proposals ○ Infrastructure needs ○ Phasing and delivery ○ Implementation route map and key milestones <p>NB: the level of detail required in relation to the above will depend on when the site is likely to come forward.</p>	

Further Sites Consultation (2014)

- 2.2.9 The Further Sites Consultation (FSC) ⁵ in summer 2014 was a focussed consultation presenting the outcomes and seeking views on the new proposals/changes to potential allocated sites as a result of the Preferred Options Consultation and evidence received through the Strategic Sites Delivery Framework.
- 2.2.10 Additional information analysed or received was published as part of an Addendum for committee purposes in September 2014 alongside the halted Local Plan Publication draft (2014); the outcomes of which feed into the overall site selection process within this document and the Strategic Housing Land Availability Assessment.

Preferred Sites Consultation (2016)

- 2.2.11 The Preferred Sites Consultation (PSC) ⁶ set out the updated housing and employment requirements and presented a preferred portfolio of sites to meet the demand. The allocations set out in the halted Local Plan Publication draft formed the starting point for the consideration of suitable sites given they had already been through the site selection methodology.
- 2.2.12 Further sites, evidence base and boundary amendments were received as part of the PSC consultation. These responses were analysed in line with the methodology and following further technical officer comments where necessary. Officers took the outcomes of this work together with the sites highlighted for release by the MOD, including officers suggestions for site allocations, to Members of Local Plan Working Group (10th July 2017) and Executive (13th July 2017). See Annex 1 to this report for full details of the analysis undertaken..
- 2.2.13 The Executive resolution predominantly took forward the site boundaries and quantum set out at the Preferred Sites Consultation stage (2016) but included the new MOD sites at Strensall and Fulford and minor changes to sites, where suggested. The minutes of this meeting outlining the decision made by Members⁷ is attached as Annex 2.

⁵ Further Sites Consultation documents:

https://www.york.gov.uk/downloads/download/1133/further_sites_consultation_report_2014_and_technical_appendices

⁶ Preferred Sites Consultation documents:

https://www.york.gov.uk/downloads/download/3333/local_plan_preferred_sites_consultation_documents

2.3 Determining Suitability and Reasonable Alternatives

2.3.1 In order to sieve out the potential sites most suitable for development, a two stage suitability process was undertaken, comprising:

- Stage 1: Sustainable Location Assessment
- Stage 2: Technical Officer Group

Site Threshold

2.3.2 The site threshold of 0.2ha was set in SHLAA Phase 1 (Strategic Land Availability Assessment Phase 1, CYC, April 2008) and used in SHLAA phase 2 (SHLAA Phase 2, CYC, September 2011). This is in line with SHLAA guidance⁸, which advises that authorities should recognise the potential of smaller sites. This threshold of 0.2ha is lower than the proposed threshold of 0.25ha proposed in the NPPG.

2.3.3 This lower threshold is used by the Council to recognise the high level of small sites in York and to proactively attempt to identify as many sites as possible. Sites submitted below this threshold or which were below 0.2ha after the criteria 1, 2 & 3 assessment were then removed from further assessment.

Stage 1: Sustainable Location Assessment

2.3.4 The emerging Spatial Strategy in the Local Plan sets out the key shapers for development to ensure development is focussed in the most suitable and sustainable locations in York whilst respecting the city's unique assets. The Site Selection Methodology uses the shapers set out in the emerging Spatial Strategy to assess potential site suitability. 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.

2.3.5 Stage 1 was a desktop assessment using GIS based data to accurately determine the site's location relative to the criteria.

2.3.6 All of the sites have been tested against the site selection methodology which is based on a 4 stage criteria based approach as follows:

Criteria 1- 3: Environmental Assets

2.3.7 The character and form of York provide an overarching narrative for the factors which shape growth and the choices we make in how we accommodate the

⁸ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

growth. The following environmental criteria are therefore used to assess suitable locations for growth:

- Criteria 1: Environmental Assets, including:
 - Historic Character and Setting Areas identified important to York's character and setting;
 - European, national and locally designated Nature Conservation Sites;
 - Regional Green Corridors;
 - Ancient woodlands;
 - Functional Floodplain (flood zone 3b).
- Criteria 2: Retaining existing open space where needed;
- Criteria 3: Minimising greenfield development in areas of high flood risk (flood zone 3a).

2.3.8 Figure 2 shows the Criteria 1 Environmental Assets in combination to illustrate the combined area considered, which should be protected from future development. At each stage of the assessment sites were removed from the assessment process if they failed the criteria in their entirety or, if only part of the site was shown in an environmental asset, the site size was reduced to exclude the part of the site that fell within this asset.

Criteria 4a: Access to Services and Facilities

2.3.9 York is a compact city with a relatively extensive public transport system in relation to its size and good provision of community facilities. The location and design of development can play an important role in travel choice to and from destinations and maximising the opportunity to use non car modes of transport. Maximising this potential is essential to accommodate trip growth given the constraints of the local road network and is also an important aspect of creating sustainable neighbourhoods and contributing to residents' quality of life. In addition ensuring the local provision of and sustainable access to shops, community facilities and open space promotes environmental sustainability as well as social inclusion and health and well-being.

2.3.10 In line with the Local Plan Spatial Strategy it was deemed appropriate that sites, which passed criteria 1-3 were subject to an assessment of proximity to services and to sustainable transport. The services and facilities included within the assessment were:

- Education: Access to a Nursery, Primary school, Secondary school, Higher and Further Education;

- Convenience provision: access to a neighbourhood parade containing a convenience store (incl. Butchers, greengrocers etc or supermarket), access to a supermarket, access to a doctors;
- Openspace: Number of openspaces within required distances (as defined in the Council’s Open Space Study, 2014, updated 2017).

Figure 2: Criteria 1 (Environmental Assets) combined



	City of York Council Authority Boundary
	Settlement Boundaries
	Criteria 1: Environmental Assets

2.3.11 Given the compact nature of York and its population, the majority of the built sport and leisure facilities are provided for citywide use and therefore there is an expectation that people would travel further to these facilities. Due to this, leisure facilities were not included in the assessment criteria. Other community facilities that serve day-to-day

Criteria 4b: Transport Accessibility

2.3.12 Similarly to criteria 4a, accessible sustainable transport is important to addressing York's travel challenges and has both social and environmental advantages. Furthermore, taking advantage of non car modes of transport also helps to capitalise on these benefits whilst maximising the opportunities for the economy through ensuring an accessible workforce and employment destinations. It was deemed appropriate to include an assessment of proximity to different modes of transport.

2.3.13 The transport accessibility includes the following assessment criteria:

- Access to buses (Park & Ride, frequent and non-frequent routes);
- Access to the train Station (walking and cycling);
- Access to cycle routes;
- Access to an adopted highway (A, B, Minor or Local road).

Minimum Scoring for Site Selection

2.3.14 In order to sieve out the most sustainable site options a minimum site score threshold based on access to essential services and transport was applied.

2.3.15 The full methodology, including more detail on the constraints, a flow diagram demonstrating the process and scoring mechanism, can be found in Annex 3 to this report.

Stage 2: Technical Officer Group

2.3.16 The sites which successfully passed stage 1 of the suitability assessment are considered as reasonable alternatives. 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. The Group included colleagues from:

- Conservation, Design and Sustainable Development;
- Transport and Highways;
- Environmental Protection; and

- Economic development.

Consideration of Supporting Evidence

- 2.3.17 Sites which were wholly or partly removed from the site selection process following the criteria 1-3 analysis were and will be given the opportunity to respond to the assessment with supporting evidence. Any evidence submitted through consultations which challenged the designation of the primary constraints or conclusions on a site was and will be considered by the Technical Officer Group. The results of this were previously published as part of the Site Selection Paper (2013), Further Sites Consultation (2014), Site Selection Paper Addendum (2014) and Preferred Sites Consultation (2016). In addition, consideration of technical evidence submitted through the PSC consultation and for the MOD sites was published for Executive in July 2017 and is attached as Annex 1.

2.4 Emerging guidance post assessment

- 2.4.1 Since developing the site selection process and criteria assessment in 2013 further guidance and best practice has emerged, which need to be taken into consideration.

Natural England - Impact Risk Zones for SSSIs

- 2.4.2 Natural England have defined zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. This is a GIS based tool/ dataset which is updated regularly in line with reviews of impacts on the SSSIs.
- 2.4.3 Local Planning Authorities have a duty to consult Natural England before granting planning permission on any development that is in or likely to affect a SSSI. The IRZs can be used by LPAs to consider whether a proposed development is likely to affect a SSSI and determine whether they will need to consult Natural England to seek advice on the nature of any potential SSSI impacts and how they might be avoided or mitigated.
- 2.4.4 In addition, the IRZS include effects on European designated sites where these objectives are different to the SSSI. The IRZs can therefore be used to inform Habitat Regulation Assessments to determine likely significant effect from particular types of development on the interest features of a European designated site. The SSSI IRZs also cover "Compensation Sites" which have been secured as compensation for impacts on Natura 2000/Ramsar sites. Each

Compensation Site has been given the same IRZs as the Natura 2000/Ramsar site(s) it is providing compensation for.

- 2.4.5 Given that this is a tool that could provide further information on the potential impacts on European nature conservation sites and SSSIs, all of the sites which have passed the criteria assessment have been re-evaluated against the IRZs to understand whether housing development would have a potential impact on the nature conservation designation. The outcomes of this work have fed into the overall assessment.

Flood risk

- 2.4.6 The environment agency periodically updates the flood risk data for which is used to underpin the York Strategic Flood Risk Assessment (SFRA) for York. This evidence base has fed into the overall site assessment to ensure that development is excluded from the most high risk zones.
- 2.4.7 The Environment Agency has updated their baseline data in York as a result of reviewing the River and Ouse and River Foss. This data will feed into an updated SFRA in due course. In the meantime sites have been tested against the new baseline data from the EA in conjunction with colleagues in Flood Risk Management to understand whether there would be any impact on the site selection process.

Agricultural Land Value

- 2.4.8 The National Planning Policy Framework paragraph 112 states:

“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”

- 2.4.9 Further consideration of Agricultural land is included in the consideration of potential sites for development.

2.5 Determining Availability of a site

- 2.5.1 The majority of sites assessed were received through the Call for Sites process or subsequent Local Plan consultations. Through this process we asked that landowner details were provided to us to ensure that we could confirm availability and that the site had a willing landowner. We also asked for details of whether the site had been promoted commercially or by an agent as well as when the site

would be become available for development. Since 2012, the availability of sites has been reconfirmed through consultation.

- 2.5.2 For the allocated sites set out in the Section 3.3, availability of the site has been confirmed and the timescales reflect our understanding of when the site will be brought forward in the plan period.

2.6 Determining Deliverability of a site

- 2.6.1 It is important to establish how much a proposed site for development could deliver within the timescale of the Local Plan . The Local Plan Viability Study (draft, 2014)⁹ set out an archetype approach to determining housing numbers on sites less than 5ha (Non-strategic sites).

- 2.6.2 The following archetypes have therefore been used to determine the scale of potential development on a site and to give an estimated yield on non-strategic sites:

Area	Site Type	Dwelling no	Gross Site Size	Gross:Net Ratio	Net Site Size	Density
City Centre/ City Centre Extension	Large	95	1ha	95%	0.95ha	100dph
	Medium	50	0.5ha	100%	0.5ha	100dph
	Small	20	0.2ha	100%	0.2ha	100dph
Urban	Large	45	1ha	95%	0.95ha	50dph
	Medium	25	0.5ha	100%	0.5ha	50dph
	Small	10	0.2ha	100%	0.2ha	50dph
Suburban	Large	140	4ha	70%	3.5ha	40dph
	Medium	38	1ha	95%	0.95ha	40dph
	Small	8	0.2ha	100%	0.2ha	40dph
Village/Rural	Village	122	5ha	70%	3.5ha	35dph
	Large	33	1ha	95%	0.95ha	35dph
	Medium	7	0.2ha	100%	0.2ha	35dph
	Small	1	0.05ha	100%	0.05ha	35dph

- 2.6.3 The archetypes use indicative dwellings mixes of potential development scenarios coming forward to assume that this is reflective of the nature of future development in York.

⁹ https://www.york.gov.uk/downloads/download/1231/further_published_evidence

- 2.6.4 For strategic sites (over 5ha) a bespoke approach is taken to reflect the site characteristics and detailed work undertaken.
- 2.6.5 Paragraph 173 of the NPPF advises that cumulative effects of planning policy should not combine to render plans unviable and that sites that appear in the plan should be viable.
- 2.6.6 Paragraph 174 of the NPPF also creates two concepts of ‘deliverability’ (which applies to sites which are expected in Years 0-5 of the plan) and “developability” (which applies to year 6 onwards of the plan).
- 2.6.7 It is important to define these terms.
- To be deliverable, *“sites should be available now, offer a suitable location for development now, and be achievable, with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.”*
 - to be developable, sites expected in Year 6 onwards should be able to demonstrate a *“reasonable prospect that the site is available and could be viably developed at the point envisaged”*.
- 2.6.8 The NPPF therefore advises that a more flexible approach may be taken to the sites coming forward in the period after the first five years. Sites coming forward after Year 6 might not be viable now – and might instead be only viable at that point in time. This recognises the impact of economic cycles and policy changes over time.
- 2.6.9 In respect of development costs, NPPG states that the assessments should be based on robust evidence, reflect local market conditions and include all costs of development including:
- build costs;
 - known abnormal costs;
 - infrastructure costs;
 - the cumulative costs of policy requirements and standards;
 - finance costs; and
 - professional, project management, sales and legal costs.
- 2.6.10 Viability work will be ongoing as the Local Plan progresses. Information on emerging viability is available on <http://www.york.gov.uk/localplan>.

3 HOUSING SUPPLY

3.1 Sites with Existing Permissions

3.3.1 We monitor residential planning permissions and completions to ensure we understand how many have been granted consent or brought forward over time to feed into our housing trajectory.

3.3.2 The Housing Monitoring Update (2017) (See Annex 4) identifies the following:

Housing Completions

Between 1st April 2016 and 31st March 2017 there were a total of **977 net Completions** comprising:

- 571 homes (58.4%) were completed on traditional (use Class C3) housing sites;
- 152 homes (15.6%) were a result of off campus privately managed student accommodation schemes;
- 252 homes (25.8%) were from sites benefitting from relaxed permitted development rights to allow conversion to residential use;
- Changes of use of existing buildings to residential use and conversions to existing residential properties accounted for 564 (57.7%) of all completions, by far the greatest total for at least 20 years; and
- Development sites including Former Terry's Factory site (174), Derwenthorpe (76), Our Lady's RC School (55) Former Grain Stores Water Lane (50), and Windy Ridge/Brecks Lane, Huntington (40) all contributed much needed new housing stock over the monitoring period.

Housing Consents

Net housing consents between 1st April 2016 and 31st March 2017 totalled **451 net additional homes**. This total represents a marked decrease in residential approvals compared to those experienced during the previous three full monitoring years. However, housing consents are still higher compared to those achieved during the recessionary period preceding 2013/14. As at the 1st April 2017 there were extant planning permissions for 3,578 homes which will contribute towards meeting the overall housing requirement in the Plan.

The main features of the consents approved during 2016/17 monitoring period were:

- 243 of all net homes consented (53.8%) were granted on traditional (Use Class C3) housing sites.
- 73 off campus privately managed student accommodation units (16%) were consented; and

- A further 177 net new homes (39.2%) were permitted a result of relaxed permitted development rights.

3.2 Windfall Allowance

- 3.2.1 Windfalls sites, as defined in the NPPF (2012) are sites which have not been specifically identified as available in the Local Plan process – they normally comprise previously developed sites that have unexpectedly become available. In line with NPPF Local Planning authorities can make an allowance for windfalls if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- 3.2.2 In taking a proportionate approach to identifying land for development in the emerging Local Plan only sites above the site threshold 0.2ha have been identified as draft allocations. To ensure that we properly understand the potential for development on very small sites below this allocation threshold an assessment of the trends in the historic rate of windfall delivery along with changes of use and conversions has been carried out. This analysis is set out in Annex 5: City of York Local Plan Windfall Allowance Technical Paper (2017). The annual figure for windfalls is 169 dwellings per annum which is effectively a mean average for these two categories of windfalls calculated over a 10 year period. To avoid double counting and to allow time for sites to continue through the development process, windfalls will be included from year four of the trajectory. Garden infill sites have been removed.

3.3 Allocated Sites in the Pre-Publication draft Local Plan

- 3.3.1 Members of the Council's Executive at the meeting on 13 July 2017 resolved that on the basis of the housing analysis presented, the increased figure of 867 dwellings per annum, based on the latest revised sub national population and household projections published by the Office for National Statistics and the Department of Communities and Local Government, be accepted.
- 3.3.2 Table 2 below presents the sites agreed to meet that need following the consideration of the analysis included in Annex 1. In addition, The housing trajectory associated with that need is summarised in Figure 3 to 4. The Pre Publication draft Local Plan Proposals Maps showing these sites are illustrated as Figures 5 -7 of this report.

Table 2: Housing Allocations in the Pre Publication draft Local Plan (Regulation 18 Consultation)

Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing
H1	Former Gas Works, 24 Heworth Green (Phase 1)	2.87	271	Short Term (Years 1 - 5)
H1	Former Gas works, 24 Heworth Green (Phase 2)	0.67	65	Medium Term (Years 6-10)
H3	Burnholme School	1.90	72	Short Term (Years 1 - 5)
H5	Lowfield School	3.64	162	Short to Medium term (Years 1 - 10)
H6	Land R/O The Square Tadcaster Road	1.53	0*	Short to Medium Term (Years 1 - 10)
H7	Bootham Crescent	1.72	86	Short to Medium Term (Years 1 - 10)
H8	Askham Bar Park & Ride	1.57	60	Short Term (Years 1 - 5)
H10	The Barbican	0.96	187	Short Term (Years 1 - 5)
H20	Former Oakhaven EPH	0.33	56	Short Term (Years 1 - 5)
H22	Former Heworth Lighthouse	0.29	15	Short Term (Years 1 - 5)
H23	Former Grove House EPH	0.25	11	Short Term (Years 1 - 5)
H29	Land at Moor Lane Copmanthorpe	2.65	88	Short to Medium Term (Years 1 - 10)
H31	Eastfield Lane Dunnington	2.51	76	Short to Medium Term (Years 1 - 10)
H38	Land RO Rufforth Primary School Rufforth	0.99	33	Short to Medium Term (Years 1 - 10)
H39	North of Church Lane Elvington	0.92	32	Short to Medium Term (Years 1 - 10)
H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	2.74	104	Short to Medium Term (Years 1 - 10)
H52	Willow House EPH, Long Close Lane	0.20	15	Short Term (Years 1 - 5)
H53	Land at Knapton Village	0.33	4	Short Term

Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing
				(Years 1 - 5)
H55	Land at Layerthorpe	0.20	20	Short Term (Years 1 - 5)
H56	Land at Hull Road	4.00	70	Short Term (Years 1 - 5)
H58	Clifton Without Primary School	0.70	25	Short Term (Years 1 - 5)
H59	Queen Elizabeth Barracks – Howard Road, Strensall	1.34	45	Short to Medium term (Years 1 -10)
ST1	British Sugar/Manor School	46.3	1,200	Lifetime of the Plan (Years 1-16)
ST2	Former Civil Service Sports Ground Millfield Lane	10.40	266	Short to Medium Term (Years 1 - 10)
ST4	Land adj. Hull Road & Grimston Bar	7.54	211	Short to Medium Term (Years 1 - 10)
ST5	York Central	35.0	1,500	Lifetime of the Plan and Post Plan period (Years 1-21)
ST7	Land East of Metcalfe Lane	34.5	845	Lifetime of the Plan (Years 1 - 16)
ST8	Land North of Monks Cross	39.5	968	Lifetime of the Plan (Years 1 - 16)
ST9	Land North of Haxby	35.0	735	Lifetime of the Plan (Years 1 - 16)
ST14	Land to West of Wigginton Road	55.0	1,348	Lifetime of the Plan and Post Plan period (Years 1 - 21)
ST15	Land to West of Elvington Lane	159.0	3,339	Lifetime of the Plan and Post Plan period (Years 1 - 21)
ST16	Terrys Extension Site – Terry's Clock Tower (Phase 1)	2.18	22	Short to Medium Term (Years 1-5)
ST16	Terry's Extension Site – Terry's Car Park (Phase 2)		33	Short to Medium Term (Years 1 – 10)

Allocation Reference	Site Name	Site Size (ha)	Estimated Yield (Dwellings)	Estimated Phasing
ST16	Terry's Extension Site – Land to rear of Terry's Factory (Phase 3)		56	Short to Medium Term (Years 1 – 10)
ST17	Nestle South (Phase 1)	2.35	263	Short to Medium Term (Years 1 - 10)
ST17	Nestle South (Phase 2)	4.70	600	Medium to Long Term (Years 6 – 15)
ST31	Land to the South of Tadcaster Road, Copmanthorpe	8.10	158	Short to Medium Term (Years 1-10)
ST32	Hungate (Phases 5+)	2.17	328	Short to Medium Term (Years 1-10)
ST33	Station Yard, Wheldrake	6.0	147	Short to Medium Term (Years 1-10)
ST35**	Queen Elizabeth Barracks, Strensall	28.8	578	Medium to Long Term (Years 6-15)
ST36**	Imphal Barracks, Fulford Road	18.0	769	Post Plan period (Years 16-21)

Figure 3: Housing Trajectory

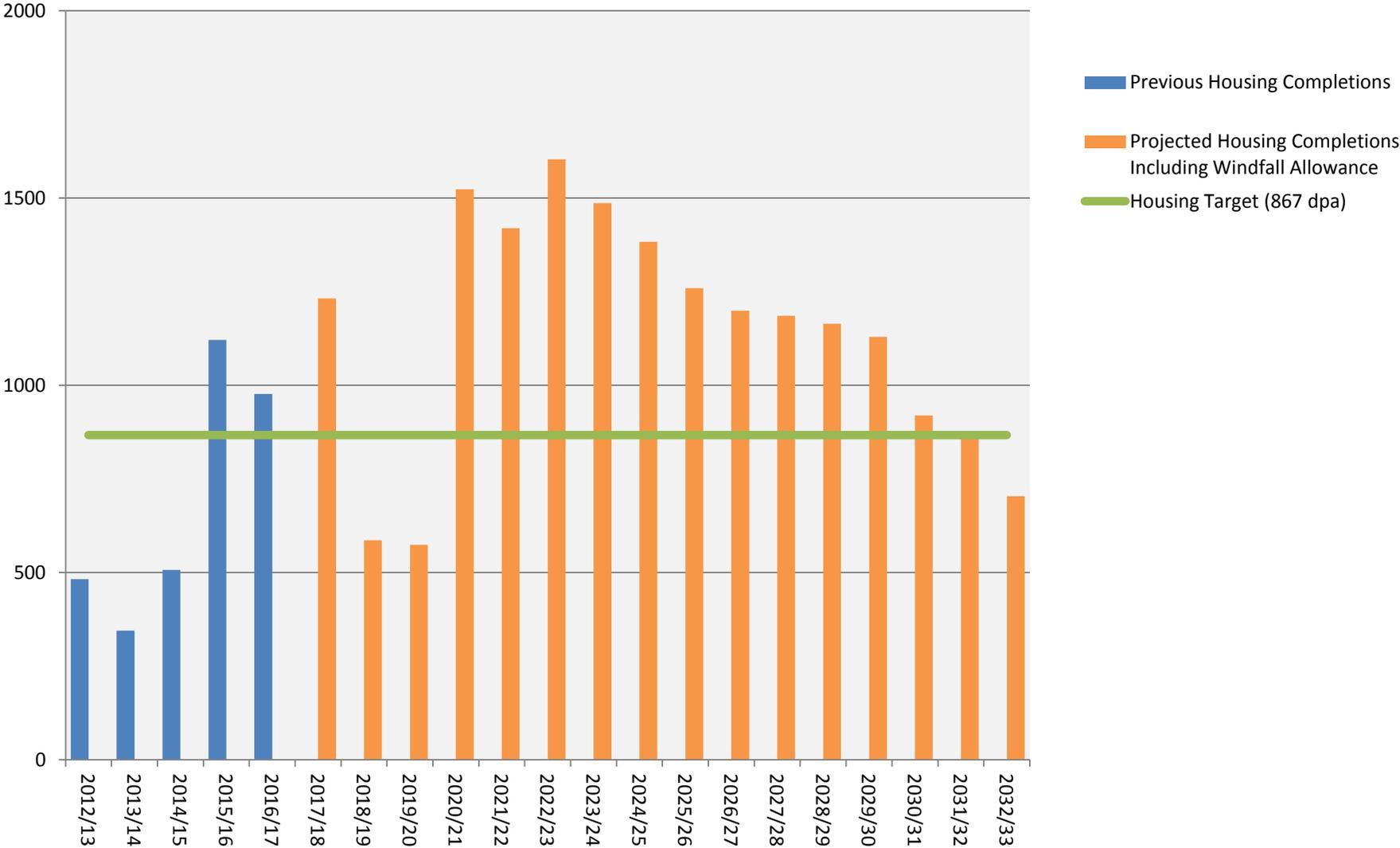
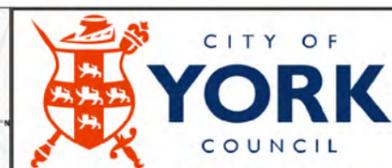


Figure 4: Housing Trajectory (Start date 1st April 2017, end date 31st March 2033)

	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Year	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33
Projected Housing Completions Including Windfall Allowance (From Year 4)	1232	586	574	1523	1419	1603	1486	1383	1259	1199	1185	1164	1129	919	874	704
Annual Housing Target	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867	867
Inherited Shortfall (2012 - 2017) Annualised over Plan Period	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56	56
Annual Target (Inclusive of shortfall)	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923	923
Over/Under Supply of Housing	309	-28	-377	223	719	1399	1962	2422	2758	3034	3296	3537	3743	3739	3690	3471

Figure 5: Pre Publication draft Local Plan Proposals Map - North



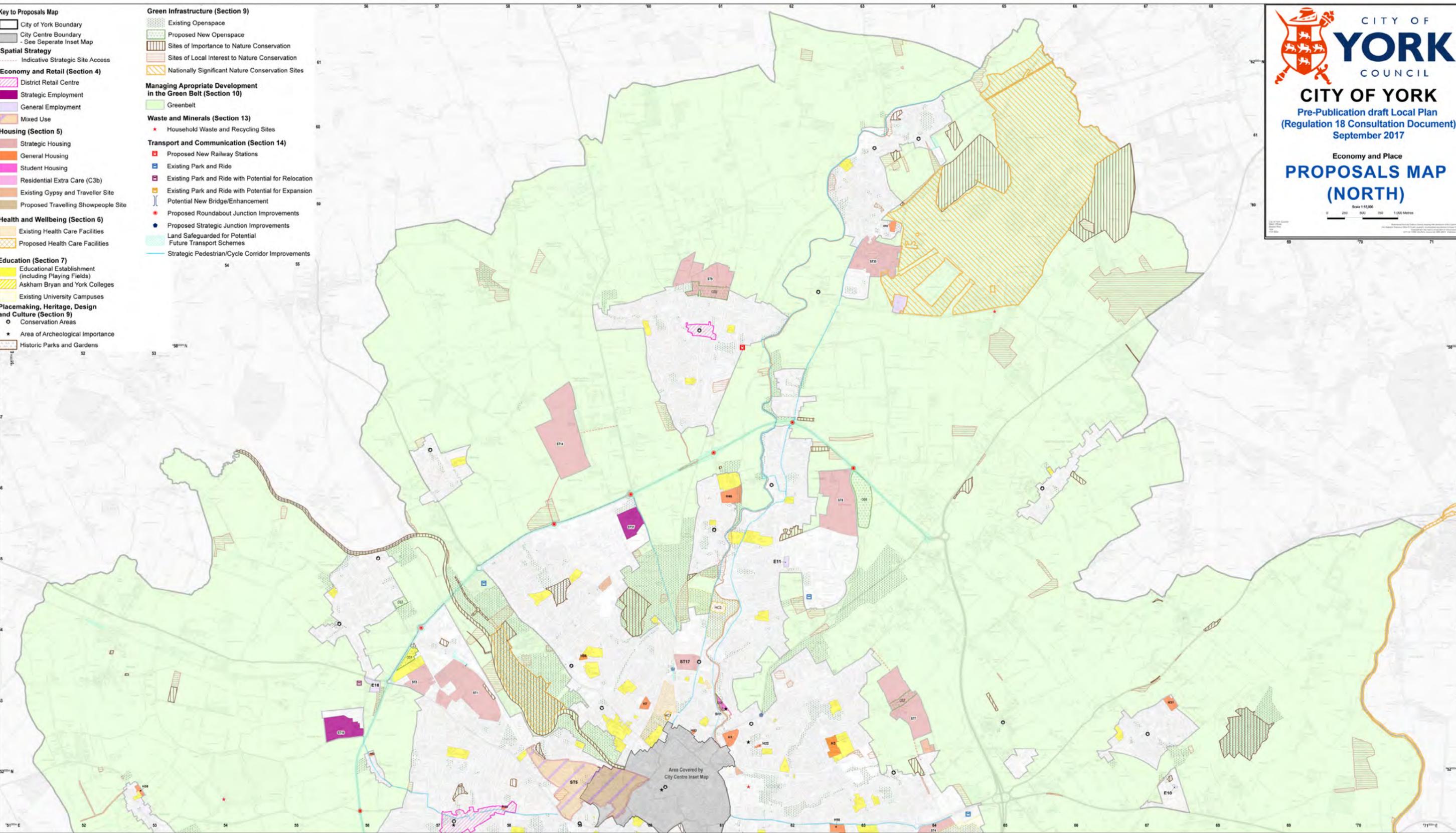
CITY OF YORK
COUNCIL
CITY OF YORK
Pre-Publication draft Local Plan
(Regulation 18 Consultation Document)
September 2017

Economy and Place
PROPOSALS MAP
(NORTH)

Scale 1:15,000
0 250 500 750 1,000 Metres

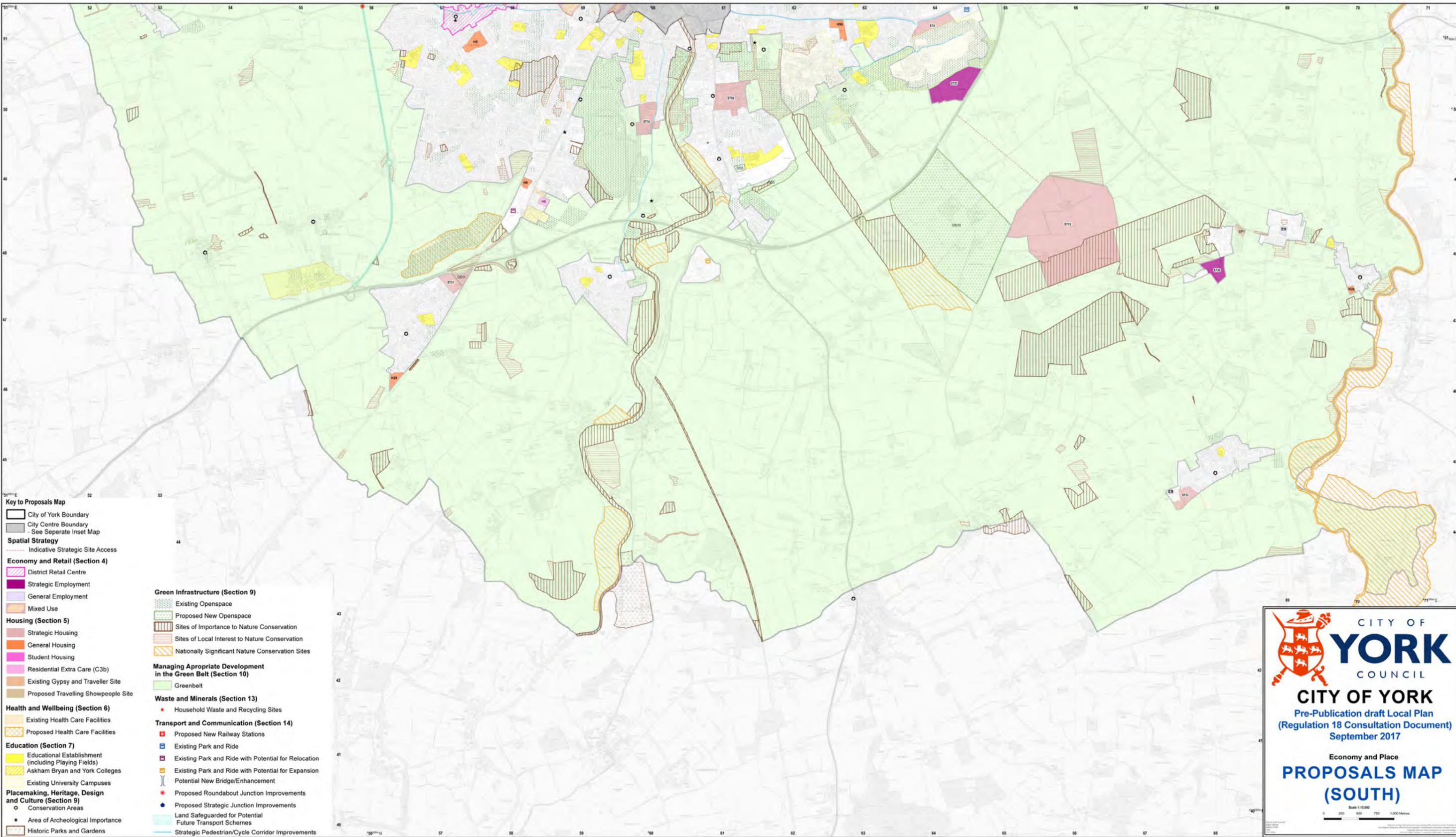
Map of the City of York, showing the City Boundary, City Centre Boundary, and various planning proposals. The map includes a grid of coordinates and a scale bar.

- Key to Proposals Map**
 - City of York Boundary
 - City Centre Boundary - See Separate Inset Map
- Spatial Strategy**
 - Indicative Strategic Site Access
- Economy and Retail (Section 4)**
 - District Retail Centre
 - Strategic Employment
 - General Employment
 - Mixed Use
- Housing (Section 5)**
 - Strategic Housing
 - General Housing
 - Student Housing
 - Residential Extra Care (C3b)
 - Existing Gypsy and Traveller Site
 - Proposed Travelling Showpeople Site
- Health and Wellbeing (Section 6)**
 - Existing Health Care Facilities
 - Proposed Health Care Facilities
- Education (Section 7)**
 - Educational Establishment (including Playing Fields)
 - Askham Bryan and York Colleges
 - Existing University Campuses
- Placemaking, Heritage, Design and Culture (Section 9)**
 - Conservation Areas
 - Area of Archeological Importance
 - Historic Parks and Gardens
- Green Infrastructure (Section 9)**
 - Existing Openspace
 - Proposed New Openspace
 - Sites of Importance to Nature Conservation
 - Sites of Local Interest to Nature Conservation
 - Nationally Significant Nature Conservation Sites
- Managing Appropriate Development in the Green Belt (Section 10)**
 - Greenbelt
- Waste and Minerals (Section 13)**
 - Household Waste and Recycling Sites
- Transport and Communication (Section 14)**
 - Proposed New Railway Stations
 - Existing Park and Ride
 - Existing Park and Ride with Potential for Relocation
 - Existing Park and Ride with Potential for Expansion
 - Potential New Bridge/Enhancement
 - Proposed Roundabout Junction Improvements
 - Proposed Strategic Junction Improvements
 - Land Safeguarded for Potential Future Transport Schemes
 - Strategic Pedestrian/Cycle Corridor Improvements



Area Covered by City Centre Inset Map

Figure 6: Pre Publication draft Local Plan Proposals Map - South



- Key to Proposals Map**
- City of York Boundary
 - City Centre Boundary
 - See Separate Inset Map
- Spatial Strategy**
- Indicative Strategic Site Access
- Economy and Retail (Section 4)**
- District Retail Centre
 - Strategic Employment
 - General Employment
 - Mixed Use
- Housing (Section 5)**
- Strategic Housing
 - General Housing
 - Student Housing
 - Residential Extra Care (C3b)
 - Existing Gypsy and Traveller Site
 - Proposed Travelling Showpeople Site
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 - Existing Park and Ride with Potential for Relocation
 - Existing Park and Ride with Potential for Expansion
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 - Proposed Strategic Junction Improvements
 - Land Safeguarded for Potential Future Transport Schemes
 - Strategic Pedestrian/Cycle Corridor Improvements



CITY OF YORK
COUNCIL

CITY OF YORK
Pre-Publication draft Local Plan
(Regulation 18 Consultation Document)
September 2017

Economy and Place
PROPOSALS MAP
(SOUTH)

Scale 1:15,000
0 250 500 750 1,000 Metres

Figure 7: Pre Publication draft Local Plan Proposals Map - City Centre Insert

CITY OF YORK
Pre-Publication draft Local Plan
(Regulation 18 Consultation Document)
September 2017

Economy and Place

PROPOSALS MAP
(CITY CENTRE INSET)

Scale 1:2,500
0 50 100 150 200 Metres

KEY TO PROPOSALS MAP
(City Centre Inset)

Land Outside City Centre
(See Proposals Map North and South)

City Centre Boundary

Economy and Retail (Section 4)

- Primary Shopping Frontage
- Secondary Shopping Frontage
- York - Primary Shopping Area
- Mixed Use Site (ST5)
- Castle Gateway Opportunity Area (ST20)

Housing (Section 5)

- Strategic Housing
- General Housing

Education (Section 7)

- Educational Establishment
(Including Playing Fields)
- University Campus

**Placemaking, Heritage, Design
and Culture (Section 9)**

- * Area of Archaeological Importance
- o Conservation Area
- Historic Park and Garden
- Minster Precinct

Green Infrastructure (Section 9)

- Existing Openspace
- Site of Importance to Nature Conservation
- Site of Local Interest to Nature Conservation

Transport and Communication (Section 14)

- York Railway Station
- Potential New Bridge/Enhancement
- Indicative Location for Potential New Bridge
- Strategic Pedestrian and Cycle
Improvement Corridor

