



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

PHASE 2 HEARINGS

**MATTER 4: SPATIAL STRATEGY
AND SITE SELECTION PROCESS**

CITY OF YORK COUNCIL STATEMENT

Matter 4 – Spatial Strategy and Site Selection Process

Spatial Strategy

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

4.1.1 Yes, the Spatial Strategy is sound, see CYC response to Phase 1, Matter 2 [EX/HS/M2/SD/0/CYC]. Robust evidence ensures the Plan takes an integrated and sustainable approach to accommodating growth, within the context of York's special character, to locate development in the most suitable areas. The Plan is also subject to a process of Sustainability Appraisal (SA), informed by Heritage Impact Appraisal (HIA), and Habitat Regulation Assessment (HRA). See Appendix 1 for the primary evidence and appraisal underpinning the Spatial Strategy.

4.1.2 Section 2 and specifically, Tables 2.2, 2.3, 2.4, and 2.13 of the SA [CD008] provides a comprehensive summary of the evolution of the Spatial Strategy, and the consideration of alternatives. The submitted spatial strategy has been shown to be the most appropriate, when considered against reasonable alternatives. The preferred spatial strategy and reasonable alternatives are presented in Table 4.3 of the Local Plan Preferred Options SA [SD007a]. Paragraphs 4.3.15 to 4.3.22 of 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. Four alternative approaches were considered. The preferred approach, which underpins the submitted Plan (Option 3) sought to take a balanced approach to spatial principles and the factors that shape growth, to protect and enhance the city's built and natural environmental assets, avoiding significant negative effects. The appraisal acknowledged that, in order to meet community needs and deliver economic growth, new development may place some pressure on these existing assets. This balanced approach was also expected to deliver new development that was well served, accessible and supported the use of sustainable public transport. None of the reasonable alternatives assessed as part of the SA performed better, in sustainability terms, than the preferred option that comprises the submitted spatial strategy.

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?

4.2.1 Yes, the approach is justified, representing the most appropriate strategy when considered against the reasonable alternatives, and based on proportionate evidence. See response to Question 4.1. Extensive consultation has allowed for effective engagement of interested parties [CD013, EX/CYC/22 and EX/CYC/65].

4.2.2 The approach is effective, being deliverable and coherent, based on co-ordinated planning, and flexible in responding to changes in circumstances. The spatial strategy will ensure that the Plan's objectives are achieved, the city's development needs are addressed and the city's key characteristics are respected by securing infrastructure alongside growth and an effective source of development delivery over the plan period. As evidenced through the following:

- Key delivery partners are identified in Section 3
- Section 15 of the Plan looks at delivery and monitoring [CD001].
- The Plan is supported by an Infrastructure Delivery Plan [SD128].
- The spatial strategy is based on effective joint working on cross boundary strategic priorities and CYC consider that the Duty to Co-operate has been met [EX/HS/M1/LR/0a/CYC].

4.2.3 The spatial strategy is consistent with national policy (NPPF 2012 Paragraphs 14 and 17) and enables the delivery of sustainable development through:

- positively seeking to meet the city's objectively assessed development needs;
- directing development to the most sustainable locations, making as much use as possible of suitable previously developed land (with some release of Green Belt land);
- guiding the scale and pattern of development by the need to safeguard key elements that contribute to the special character and setting of the historic city. These include the city's size and compact nature, the perception of York being

a free-standing historic city set within a rural hinterland, key views towards the city from the ring road and the relationship of the city to its surrounding settlements;

- focusing development in the main urban area and in new free-standing settlements with some urban and village extensions, limiting the amount of growth proposed around the periphery of the built-up area of York. While new settlements will affect the openness of Green Belt in those locations, their impact is assessed as less harmful to the elements which contribute to the special character and setting of York; and
- providing opportunities for rural exception sites, including for Gypsy and Travellers not meeting the national policy definition; these small scale developments provide affordable homes in locations where new homes would not usually be appropriate.

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

4.3.1 Yes, see responses to Questions 4.1 and 4.2. Policy SS1 (including PM49-PM57 [EX/CYC/58]) sets out a strategy to meet growth in a sustainable way for York, by:

- providing sufficient land to accommodate 650 jobs per annum;
- delivering a minimum average annual net provision of 822 dwellings per annum;
- delivering 3 Gypsy and Traveller pitches, 3 Travelling Showpeople pitches and 44 additional pitches for those who do not meet the Planning definition of Travellers; and
- applying spatial principles to guide the location of development:

4.3.2 Policy SS1 guides development to the most sustainable locations, making as much use as possible of suitable previously developed land, maximising development potential within urban areas [see Section 7 of EX/CYC/59].

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?

4.4.1 PM52 in EX/CYC/58 modifies Policy SS1 to clarify CYC's approach to phasing in relation to brownfield land and the sustainable location of development, to ensure accessibility to sustainable modes of transport. Proximity to sustainable transport was integral to the assessment of sites to ensure the most sustainable sites were selected for detailed consideration. See answer to Question 4.4b) which explains the assessment criteria.

4.4.2 Policies T1, T6, T7 and T8 of the Plan [CD001] will ensure that decisions on development proposals take into account the need to support a pattern of development that facilitates the use of sustainable transport and reduces congestion. Policies T2, T3, T4 and T5 will help to deliver the infrastructure to support sustainable travel.

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

4.4.3 York is a compact city with a relatively extensive public transport system in relation to its size. In line with the spatial strategy, as part of the assessment of sites, proximity to sustainable transport formed part of criteria four at Stage 1 of the process [Paragraphs 2.3.12 and 2.3.13 of SHLAA SD049]. Sites were screened following this assessment to choose the most sustainable sites for consideration at Stage 2 of the assessment of sites [Section 2.6 of Annex 1 SD049a]. Evidence of scoring of sites is in Annex 2a of SD049a. This assessment approach delivers development in locations that offer the greatest scope for the use of more sustainable modes of transport. This evidence shows that in line with Paragraph 3.12 of the Plan, future development will not lead to an unconstrained increase in traffic. Instead, the Spatial Strategy supports a pattern of development that favours and facilitates the

use of more sustainable transport to minimise the future growth in traffic. See also response to Question 4.8 which sets out that in assessing reasonable alternatives, the SA [SD007] concluded that the preferred approach to the spatial strategy was expected to deliver new development that was well served, accessible and supported the use of sustainable transport.

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

4.4.4 Yes, see response to Question 4.1 and 4.2.

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?

4.5.1 Yes, the supporting text to Policy SS1 [CD001, as modified by PM55 in EX/CYC/58] clearly explains the factors which shape growth and which underpin the approach to new development and its location. This text also identifies the key evidence base that underpin the spatial principles which guide the location of development. See also Appendix 1. These remain robust and up to date. Furthermore, the Key Diagram [CD001, as modified by PM56 and PM57] illustrates the distribution of key elements of the spatial strategy. It shows development in the main urban area, with some urban extensions as well as new settlements which preserve the historic character of York and its relationship with its hinterland and existing settlement pattern. Principally it illustrates the broad strategic allocations which fundamentally deliver the spatial strategy, and the existing main urban area, villages and strategic road/rail infrastructure for context. It does not include smaller site allocations or other land use allocations which are shown on the Policies Map [CD004, as modified by EX/CYC/58].

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

4.6.1 Yes, see response to Questions 4.1, 4.2 and 4.11c). In order to determine the most suitable and sustainable approach to meeting identified needs, Paragraph 4.3.4 of the Preferred Options SA [SD007a] states that the appraisal “focussed on the

alternative approaches to policy as opposed to the preferred policy wording to ensure a full understanding of how changing the policy approach could impact on its sustainability”. Four options for the spatial distribution of growth were considered at the Preferred Options stage, consistent with the spatial strategy principles. None of the reasonable alternatives appraised as part of the SA were considered to perform better in sustainability terms, than the preferred option. A summary of the SA process and consideration of alternatives in relation to the spatial distribution of growth can be found in EX/CYC/59 from Paragraph 4.61.

4.7 What factors have influenced the distribution of development proposed?

4.7.1 Policy SS1 sets out a spatial strategy for sustainable growth and confirms that the strategy is framed around meeting York’s development needs and spatial principles to guide the location of development. Within this context, the Plan focusses on identifying sufficient land to meet housing and economic growth (spatial drivers) in a pattern of development aligned to the factors which shape growth (spatial shapers). See response to Questions 4.1 and 4.2, which discuss the evidence and evolution of the Spatial Strategy. The spatial principles set out in Policy SS1, and further explained in the supporting text, form the basis for the broad distribution of development in the spatial strategy. Importantly, they also form the basis of how sites have been assessed in the site selection process. See response to Question 4.11a). The application of the spatial principles to the sites gives detailed expression of the spatial strategy.

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?

4.8.1 Yes, the factors which shape growth are clearly explained (see response to Question 4.5) and justified (see Questions 4.1 and 4.2). The supporting text to Policy SS1 (paragraphs 3.14 – 3.12 of CD001) identifies the key robust and up to date evidence that underpin the factors that shape growth, and Appendix 1 sets out a list of the primary evidence that underpins the spatial strategy, including the spatial principles.

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?

4.9.1 Transport appraisal has been in integral part of the site selection process. Once the most sustainable sites had been screened following Stage 1 of site assessment (see response to Question 4.4b) [Paragraphs 2.3.12 and 2.3.13 of SHLAA SD049], detailed transport matters were considered by specialist technical officers at Stage 2 to understand more site-specific suitability. [Section 2.6 of Annex 1 SD049a]. Evidence of scoring of sites is in Annex 2a of SD049a. See response to Question 4. 11 for detail on the site selection process.

b) Is CYC's transport evidence robust and adequately up to date?

4.9.2 The evidence provided in the 2018 Transport Topic Paper [SD076] was based on CYC's SATURN/ CUBE transport model. Since 2018, CYC has developed a new and improved VISUM highway network. This model is populated with RSI and traffic from 2019. Compared to the SATURN/ CUBE model CYC can now forecast transfer to bus/ P&R, make interpeak, as well as peak hour, forecast. The model was validated¹ in 2021. The VISUM model has been accepted by National Highways as a valid and up to date resource for forecasting the Local Plan's impacts upon the A64. It has also been accepted as valid and up to date for funding bids being prepared for large scale infrastructure interventions with the Department for Transport and West Yorkshire Combined Authority. The VISUM model is supplemented by VISSIM (micro-simulation) models for critical links and junctions in York. National Highways have accepted VISSIM models of both Fulford and Grimston Interchanges as valid for assessing the impact of Plan growth on the SRN.

¹ "validated" is a technical term to describe the process of establishing whether a transport network model is fit for purpose. During the validation, the flows in the model are compared to observed flows on the network. If flows are within 15% then the model is considered to be validated.

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?

4.9.3 The location of strategic sites ST14, ST8, ST7, ST4, ST27, ST15 and ST31, alongside general trip growth in York, as forecast in TEMPRO, pose a challenge to operation of the transport network. “Severe” is not a term which has a precise definition, but CYC have taken any radial or orbital link where the 2033 journey time is 20% or more of the base journey time as seeing a “severe” impact. As such, the modelling in the Transport Topic paper shows severe impacts on Hull Road (outbound PM), Wigginton Road (outbound PM), Leeman Road (inbound AM&PM), Haxby Road (outbound PM) and Fulford Road (inbound AM&PM) and National Highways believe that there is a severe impact on the A64 on the basis of their AIMSUM model. However, historically, development of housing in York has not led to growth in traffic volumes across the transport network. Car trip growth in York:

- has not presented proportionately to increases in housing/ population in the city, with traffic volumes in the centre of the city falling between 1991 and 2019, coincident with an increase of 38,000 (22%) in the population of the area of City of York Council.
- has been seen on the A1237 and A64 routes (which accommodate a significant number of long-distance trips passing through York without stopping, as well as traffic with local origins/ destinations), but has not been observed in the centre of York or on key radial routes in the city.
- has been recorded on the outer orbitals since 1991, the strongest period of growth was between 1991 and 2010, with lower trip growth since, even though growth in the number of York residents has been at a consistent rate.

4.9.4 There has also been some growth in some non-car mode travel, including a 60% increase in bus trips between 2000 and 2019. See Appendix 2 for evidence of car trip growth.

4.9.5 CYC has a history of successful sustainable transport interventions and will work with partners to develop mitigation measures (see Matter 6 for detail). CYC is

currently delivering a number of sustainable transport interventions; detail is provided in Appendix 3 relating principally to:

- Sustainable transport packages developed for the local plan allocations through the planning process (e.g. ST5)
- Comprehensive plans for developing sustainable transport modes, including bus, walking and cycling.
- Developed of a series of assessment tools of the transport network, in particular VISUM.

4.10 What role has the sustainability appraisal had in influencing the distribution of development?

4.10.1 See response to Questions 4.1, 4.8 and 4.11c), and CYC response to Phase 1, Matter 1 Question 1.7 [EX/HS/M1/LR/0b/CYC].

Site Selection Process

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

a) How have the sites been identified, assessed and selected?

Identification

4.11.1 For **housing** and **employment**, sites have been identified through:

- The “Call for Sites” and subsequent Local Plan consultations (Section 2.2 of the Strategic Housing Land Availability Assessment (SHLAA) [SD049a]).
- Extant housing and employment planning permissions.
- Former allocations which have not been developed out.

4.11.2 For **Gypsy, Traveller and Travelling Showpeople**. Sites were identified from:

- All existing authorised and unauthorised Gypsy and Traveller and Travelling Showpeople sites.
- All sites promoted in the call for sites and further sites consultation for Gypsy and Traveller and/or Travelling Showpeople uses.
- Consideration of publicly owned land.

Assessment

4.11.3 The assessment of sites for **housing** comprised a two-stage process. A full description of the methodology is at Section 2.3 of the SHLAA [SD049a] and Annex 1 [SD049b]. Stage 1 comprised an assessment of a site's location relative to environmental criteria (criteria 1-3) and their proximity to sustainable travel modes and services (criterion 4). Sites at this stage were also subject to a supplementary assessment of environmental and historic considerations. Albeit this assessment was not scored. Section 2.6 of Annex 1 to the SHLAA [SD049b] explains that screening of sites, applying a minimum scoring system, took place to ensure the most sustainable were taken forward. Stage 2 comprised technical officer assessment to understand detailed site suitability. This involved specialist technical officers from around CYC including conservation, design, and transport.

4.11.4 The assessment of site suitability for **employment** uses is set out in Section 6 of the Employment Land Review (ELR) (2016) [SD064]. It comprised the same two stage process in the SHLAA. Where sites were submitted for housing, their potential for employment was also assessed to identify where there may be alternative appropriate land uses. At Stage 2, employment sites were also subject to technical views from consultants Driver Jonas Deloitte (at the initial site selection stages) and CYC's own economic policy officers. The two-stage methodology provided a shortlist of sites which were then subject to an economic appraisal. The methodology for the economic appraisal is set out from paragraph 6.2.3 of the ELR [SD064]. Figure 12 of the ELR [SD064] sets out the scoring mechanism used.

4.11.5 Section 3 of the Gypsy, Roma, Traveller and Travelling Showpeople Site Identification Study [SD060] details the methodology for assessment of sites for **Gypsy, Traveller and Travelling Showpeople**:

- Stage 1 involved a desk top study and the application of broad suitability criteria.
- Stage 2 comprised a detailed site assessment, including a site visit and technical input from Council officers, including highways, environmental protection, and design and conservation. Sites were also assessed relating to suitability, availability and achievability, see Table 3.3 of SD060.

Selection

4.11.6 The SHLAA process identified potential housing land, and provides a detailed assessment of it, but does not make decisions about which sites should be developed. It is for the Plan itself, based upon all the available evidence, to determine which of the sites are most suitable for allocation. The portfolio of sites selected for **housing** is set out in Policy H1 of the Plan [CD001].

4.11.7 An update to the ELR was undertaken, where new sites were assessed and further work undertaken to reconsider previous site assessments [SD063]. The outcome was a list of sites which have the potential to be allocated for employment use. The sites selected for **employment** uses is set out in Policy EC1 of the Plan.

4.11.8 The site selected to meet the needs of **Travelling Showpeople**, that meet the planning definition, is set out in Policy H6 of the Plan.

4.11.9 For **education uses**, as set out in Policy ED6 of the Plan, where a specific need for an educational establishment has been established, new provision has been identified in the spatial strategy through the delivery of strategic housing allocations. Allocation of ST27 responds specifically to the growth needs of University of York

b) Is the methodology used for each justified?

- 4.11.10 Yes, the methodology used for each is based on robust and credible evidence that is proportionate (for housing and employment see Annex 2 of SD049a, for Gypsy, Traveller and Travelling Showpeople see Paragraph 3.2.5 of SD060). They have been subject to extensive consultation [CD013]. The portfolio of sites in the Plan are the most appropriate when considered against the reasonable alternatives and have been subject to sustainability appraisal (see response to Question 4.11c).
- 4.11.11 The methodologies used take account of relevant government policy and practice guidance contained within the NPPF and Planning Practice Guidance (PPG). The approach taken in the SHLAA conforms to the four staged methodology proposed by PPG, which ensures a robust assessment. The methodology for employment uses has been informed by best practice and developed in a way which has been guided by local knowledge. For Gypsy, Traveller and Travelling Showpeople a methodology has been developed that is driven by national guidance and made available for the stakeholder consideration.

c) What role has the Sustainability Appraisal had in this process?

- 4.11.12 The SA has been integral to the site selection process. The SA Scoping Report [SD008] proposed that site assessment involved a sustainable location assessment. This allowed site assessment to be iterative within the SA process alongside the development of the Plan. The site selection methodology took into consideration all aspects of sustainability in determining the best location for development (reflected in Stage 1) as discussed under Question 4.11a).
- 4.11.13 The sites which successfully passed Stage 1 of the suitability assessment were considered as reasonable alternatives for the purposes of SA. All reasonable alternatives have been appraised against the SA objectives using tailored appraisal criteria and associated thresholds of significance. Section 5 of CD008 provides an overview of the methodology applied to the site assessment with the tailored criteria set out in Table 5.4. The sites appraisal has not taken into account the

mitigation that could be provided by the draft Local Plan policies or has been proposed by the developer. This is to ensure that all site options are treated in the same manner.

4.11.14 The iterative process of the SA has informed the portfolio of proposed allocations, through appraisal and refinement. In this context, the sites within the Preferred Options, Preferred Sites Consultation and Pre-Publication Draft were assessed using the SA Framework and the findings presented in interim SA reports consulted on alongside the documents [SD007, SD020, SD023]. The site allocations in the Plan and the reasonable alternatives have been assessed against the SA Framework and the findings presented in the final SA report [CD008]. The results of the appraisal of the strategic sites, local housing sites, employment sites, sites for Travelling Showpeople and student housing sites are summarised in Section 6.5 of CD008. The results of the appraisal of all reasonable alternative site options for each use are set out in Appendix H [CD009B]. For strategic site reasonable alternatives (including alternative site boundaries) further, detailed evaluation was undertaken against the SA Framework and is contained in Appendix I [CD009B]. Appendix K to the SA [CD009C] sets out an audit trail of decision making for all the sites which passed criteria 1 to 4.

d) Have any site size thresholds been applied in the site selection process? If so, what, how and why?

4.11.15 For **housing** and **employment**, the national threshold for site identification has been lowered to 0.2ha in order to consider as many opportunities for development as possible and to recognise the contribution that small sites can make to overall supply. Sites submitted below this threshold or which were below 0.2ha after the environmental assets Criteria 1 - 3 assessment (as part of Stage 1 of the methodology) were then removed from further assessment. Where **housing** sites were identified to be over 35ha and failed the assessment for proximity to sustainable travel modes, facilities and services (Criteria 4 at Stage 1), the sites progressed to Stage 2 on the basis they would be large enough to have the opportunity to enhance and/or connect into existing facilities and transport routes / provide commensurate facilities and connection.

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

a) 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?

b) has the degree to which land does or does not serve the purposes of including land in the Green Belt been an influencing factor?

4.12.1 Yes, Green Belt issues have been in integral part of the site selection process. This includes consideration of the openness of the sites considered and the degree to which that openness contributes to the fundamental aim of Green Belt policy. The selection of sites has also taken into account the degree to which land does or does not serve the purpose of including land in the Green Belt. CYC recognise that it is important to look at all Green Belt purposes in relation to decisions and the level and type of harm which may be caused from the potential release of land to accommodate needs. This has been achieved through the following:

- Strategic Green Belt issues were a consideration as part of Stage 1 of the site selection process for **Housing, Employment and Gypsy, Traveller and Travelling Showpeople** sites, based upon the areas that are most important to keep open in York [SD107, SD106 and SD108]. Sites that passed this high-level environmental sieve were not considered to have any significant constraints in relation to Green Belt with regard to protecting the most important areas of York's historic character and setting, not that there were no issues in relation to impact on openness or Green Belt purposes.
- Detailed considerations of Green Belt issues formed part of technical officer discussions on sites at Stage 2, wherein openness was taken into account and the degree to which land does or does not serve the purposes of including land in the Green Belt. This included evaluation of the detailed Green Belt evidence base and any relevant information received through the consultation process thereby informing the selection of allocations in the Plan

c) have any reasonable alternative sites been rejected on the basis that CYC 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?

4.12.2 No reasonable alternative sites have been rejected on the basis of our previous understanding that it was necessary to demonstrate exceptional circumstances. Extensive assessment work has been undertaken through the site selection process, HIA and SA to select a portfolio of sites that have been assessed as being most appropriate. For sites that are considered to perform a Green Belt role, as identified in EX/CYC/59, the sites selected for allocation fit with the spatial strategy, best meet the site selection criteria and are least harmful to the purposes of Green Belt. The proposed site allocations are therefore the most suitable for allocation. Sites that are still considered suitable, but have not been allocated, are identified as reasonable alternatives. CYC is satisfied that the most appropriate sites have been selected in the Plan.

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?

4.13.1 Yes, further work has been undertaken in relation to the HRA since the **housing** sites identified in the plan were selected. A summary of the further work on the HRA is summarised in CYC’s letter to the Inspectors dated 22 December 2020 [EX/CYC/44].

4.13.2 Further work in the 2019 HRA [EX/CYC/14c] recommended the deletion of site ST35 ‘Queen Elizabeth Barracks, Strensall’ and H59 ‘Howard Road, QEB, Strensall’ from the Plan. This led to a proposed modification to the Plan (PM18 and PM19 in EX/CYC/20, superseded by PM63 in EX/CYC/58). The latest HRA [EX/CYC/45] continues to recommend deletion of both sites.