



City of York

LDF

Local
Development
Framework

Annex 3:
Former British Sugar / Manor School
Supplementary Planning Document

Post Consultation Draft
Sustainability Appraisal

March 2012

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1 Introduction

- 1.1 City of York Council is currently preparing the City of York Local Development Framework. The LDF will supersede the Draft Local Plan adopted for Development Control purposes in April 2005. It will set out the planning policy for York and where, for example, housing and economic growth will be concentrated as well as protection for the historic and natural environment.

LDF Documents

- 1.2 The LDF is comprised of a suite of documents, known as Local Development Documents (LDDs), that will set out the blueprint for the economic, social and environmental future of York which will provide the framework for implementing the Council's aims and objectives that affect the use of land and buildings. There are two types of LDD produced: Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). The first are statutory documents, which will undergo public examination while the latter may expand a particular policy or policies within the plan giving greater detail and delivery mechanisms. Specific areas within York are also progressing as part of Area Action Plans (AAPs), which are focussed plans detailing the vision and objectives for development in that area. The Council is currently working on the following documents within its LDF. All of the following documents are available on the City of York Council Website:

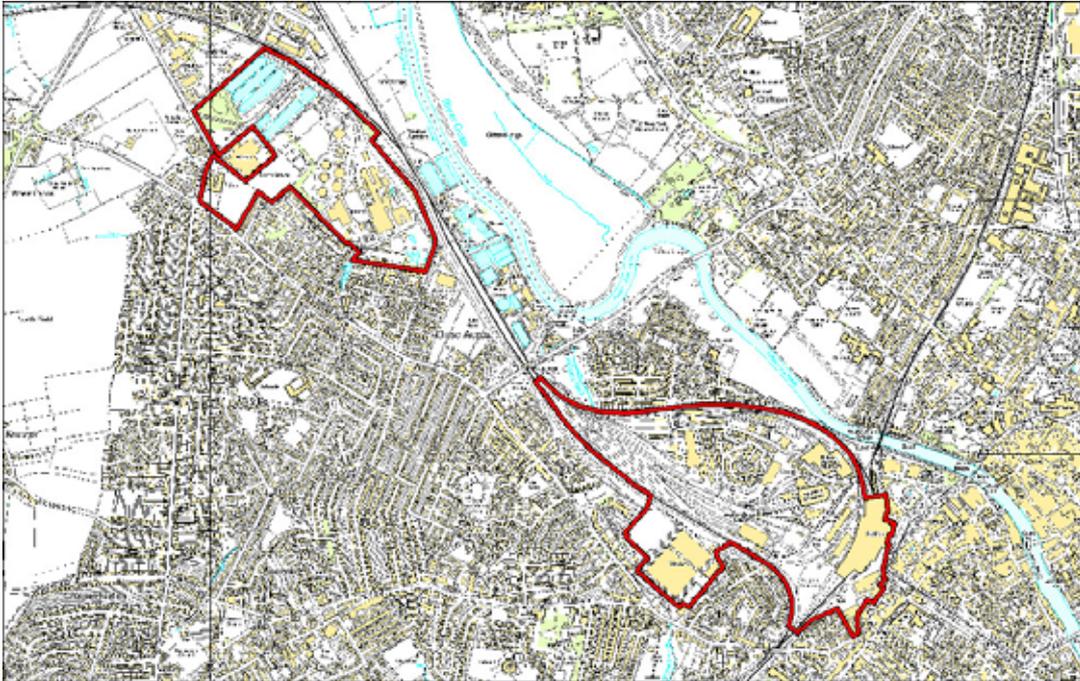
- **Core Strategy DPD**
The City of York Core Strategy is the primary spatial delivery mechanism for York's Sustainable Community Strategy. This will set out the overall direction of the plan by driving forward the spatial planning framework for the city. It will set out a vision, strategic objectives, targets and policies that will ensure the protection and enhancement of the city's historical and green assets whilst ensuring that new development are brought forward to meet local need in line with national and regional policy. The Core Strategy has now reached Submission stage and is awaiting its Examination by the Planning Inspectorate.
- **Allocations DPD**
This DPD will set out the key allocations for the city in terms of housing, employment and retail sites as well as determining the Greenbelt Boundary. A "call for sites" was undertaken in Spring/Summer 2008, which has provided sites to be considered. This document has a SA Scoping Report and an initial statement, which accompanied the Issues and Options consultation.
- **City Centre Area Action Plan**
This is an AAP focussing on the vision for the city centre and what/how it should develop into the future. This AAP has undergone an issues and Options consultation and is being worked into a Preferred Options document. This document is subject to SA and has an existing SA scoping Report and SA Statement for the Issues and Options stage.

The York Northwest Corridor

- 1.3 The York Northwest Corridor comprises of 2 strategic development sites extending from behind the train station in the city centre to the edge of the urban area. The Core Strategy chapter 6 describes the overall policy approach to developing the site. A separate policy is included for each site to be taken forward as an SPD and set out the core principles for development on each site.

- 1.4 The British Sugar SPD builds upon the policy set out in the Core Strategy and gives a more detailed direction on planning matters relating specifically to that site. This sustainability appraisal focuses on how the SPD produced for the British Sugar strategic allocation meets the agreed SA framework.

Figure1: The York Northwest Sites



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Previous Consultation on the British Sugar site

- 1.5 The British Sugar site now forms part of the strategic development site “York Northwest” (Chapter 6) within the Core Strategy. Formerly the York Northwest site was taken forward as an Area Action Plan and was consulted on at Issues and Options Stage in November 2007. A Sustainability Appraisal Scoping Report was published in July 2007 and a Sustainability Appraisal Statement accompanied the Issues and Options report on consultation. The work undertaken in progressing towards Preferred Options in the AAP work has been used as background for the guidance being developed in the revised planning approach for the Core Strategy and the Supplementary Planning documents. The consultation responses received in relation to the Issues and Options for York Northwest (AAP) and the for the Preferred Options Core Strategy consultation have also be taken into consideration.
- 1.6 A summary of the sustainability appraisal comments made in relation to each of the main AAP documents produced and the preferred options core strategy is included within chapter 4.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.7 Each of the core documents within the LDF will be subject to Sustainability Appraisal (SA). SA is a process of identifying and evaluating a plan's impacts on social, economic and environmental objectives for the city and recommends how the plan can become

more sustainable by suggesting amendments to avoid or mitigate any negative impacts identified. The findings of the SA are then taken on board within the Plan's development and reflected in further drafts of the strategies to ensure it maximises its contribution towards sustainable development.

- 1.8 The SA process for York incorporates the requirement for European legislation (EU Directive 2001/42/EC), which requires spatial and land use plans to undergo Strategic Environmental Assessment (SEA). SEA is an iterative assessment process whereby the potential significant environmental effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. This document clearly sets out where the requirements of the SEA Directive have been addressed. Figure 1 indicates where information required by the SEA Directive can be found in this report.

Figure 2: Signposting of SEA requirements

Environmental Report Requirements¹	Relevant report / chapter
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Scoping Report / Chapter 2
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Scoping Report / Chapter 2 / Chapters 5 -11
c) The environmental characteristics of the areas likely to be significantly affected	Scoping Report / chapter 2 /Chapters 5 -11
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Scoping Report / Chapter 2 / Chapters 5 -11
e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Scoping Report / Chapters 2 and 3
f) The likely significant effects ² on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Baseline and Future trends subsections in Chapters 5 -11
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Recommendations and Mitigation subsections in Chapters 5 -11
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 3 (methodology)
i) A description of the measures envisaged concerning monitoring in accordance with article 10	Proposed monitoring subsections in Chapters 5 -11
j) A non-technical summary of the information provided under the above headings.	This report.

¹ As listed in Annex 1 of the SEA Directive (Directive 2001/42/EC on the assessment of plans and programmes on the environment

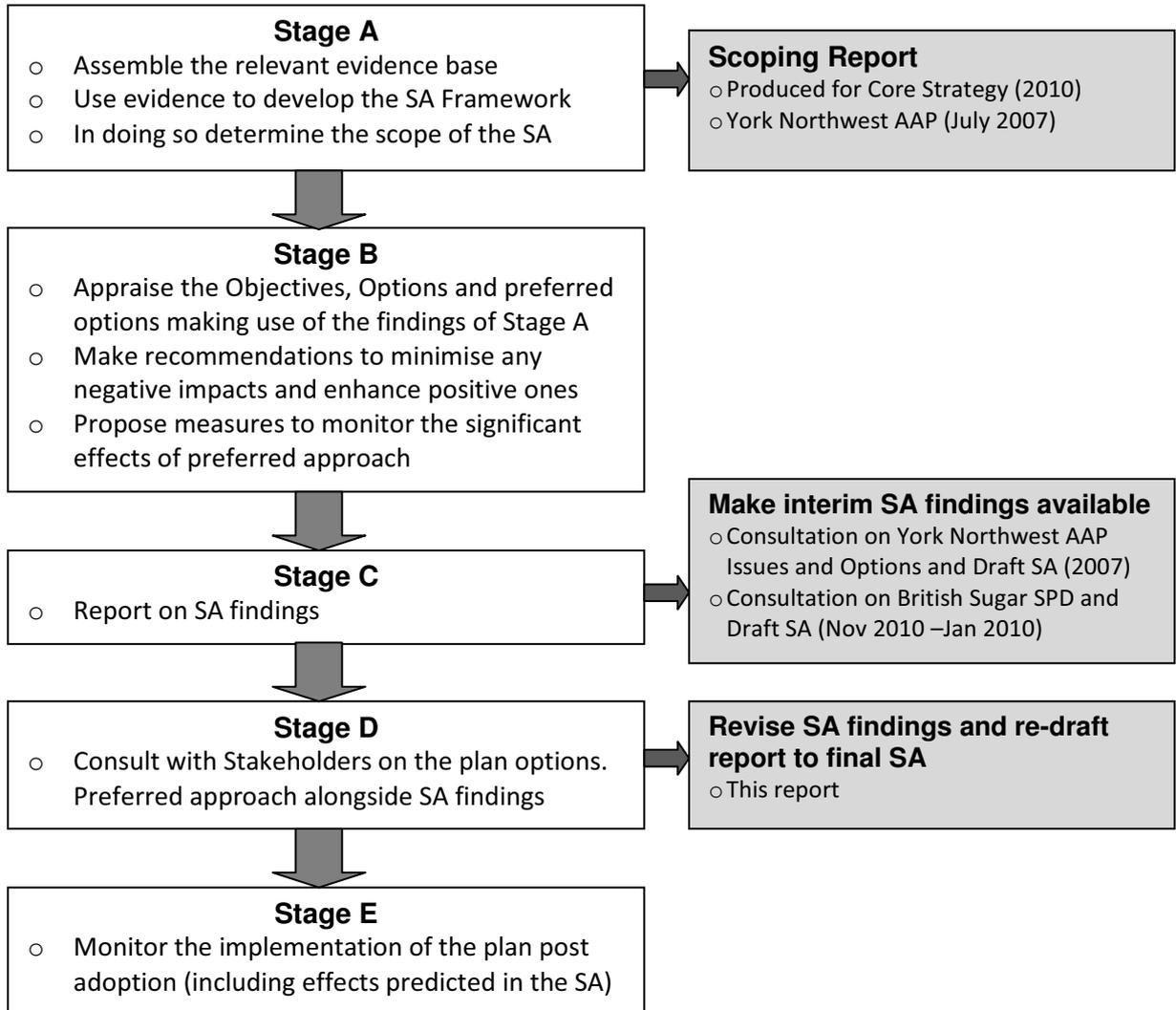
² These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

- 1.9 The 2008 Planning Regulations - known as The Town and Country Planning (Local Development)(England)Regulations 2008 - amended the 2004 Regulations which sets out the law governing production of development plan documents. These revisions removed the requirement for most SPDs to be subject to Sustainability Appraisal. SA of SPDs is still required if the effects of area based documents have not been appraised within a higher level Sustainability Appraisal. Furthermore, SPDs are still subject to SEA under the European Directive.
- 1.10 The Council have judged that whilst the Former Manor School/British Sugar site has been appraised as a Strategic Allocation in the Core Strategy Submission (Publication) document, the SPD provides further clarity on the extent of development principles and proposals on the site. This SA has therefore been produced to satisfy the regulatory requirements.

2 The SA Process

2.1 The published Government guidance on SA advocates a five-step approach to undertaking the process. Figure 2 sets out the main stages of the SA and when they are undertaken in line with the emerging DPDs and SPDs.

Figure 3: The 5 stage approach to SA.



Stage A: Scoping

- 2.2 As the British Sugar SPD sits under the Core Strategy, the Scoping Report process (Stage A) references the Revised Core Strategy Scoping Report published in September 2010 and the previous sustainability appraisal documents produced for the Issues and Options York Northwest DPD. The revised Core Strategy Scoping Report is available on the Council website via the following link:
http://www.york.gov.uk/environment/Planning/Local_development_framework/Sustainability_appraisal/
- 2.3 The scoping report establishes the framework for undertaking the Sustainability Appraisal through the production of a set of sustainable development objectives against which the sustainability performance of the plan can be measured and monitored. The objectives in the framework address sustainability issues identified from a context review of planning policy, relevant plans and evidence base for York. The framework takes into account the SEA directive requirements. Whilst the SEA Directive does not specifically require the use of objectives, this has proved a useful way in which to describe, analyse and compare the environmental and sustainability effects of the plan. Figure 4 sets out the SA Framework of objectives.
- 2.4 The Scoping Report and previous Baseline Report for the the York Northwest AAP also establishes the baseline data and sets the character and sustainability context for York. Further baseline information is provided within this report under each relevant theme to establish site specific data for the British Sugar site. However, the scoping report and baseline report for York Northwest should also be referenced.
- 2.5 Elements of the process set out by Stage A are also integral to fulfilling the requirements of the SEA Directive.

An 'Environmental Report' required under the SEA Directive should include:

"An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" to determine "the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme...and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex 1 (a), (e)).

"The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" and "the environmental characteristics of areas likely to be significantly affected".

"Any existing problems which are relevant to the plan or programme including, in particular, those relating to any area of particular importance such as areas designated pursuant to Directives 79/409/EEC (the 'Bird's Directive') and 92/43/EEC (the Habitats Directive)".

Consultation on the Scoping Report

- 2.6 The 2004 Planning and Compulsory Purchase Act as well as the SEA Directive require the Council to consult with the statutory bodies: Natural England, Environment Agency and English Heritage on the scope of the report. In addition to the statutory consultees, the Scoping Report consultation also included neighbouring local authorities, Government Office for Yorkshire and Humber, Yorkshire Environment Forum, internal council officers and was available for to the general public via the City of York website.

- 2.7 The scoping report for the York Northwest AAP went out for consultation in July 2007. A revised Scoping Report was published in September 2010 for the Core Strategy. This report took into consideration issues and evidence base which had emerged since the production of the original scoping report. This report was consulted on with the Statutory bodies whose comments were used to inform the final document. The revised Scoping report is available to download from the City of York Council website.

The Context Review

- 2.8 The main review of plans is set out in Annex 2 of the revised SA Scoping Report (September 2010), which is available on the Council's website³. In addition to the documents included within this annex, the following documents have also been looked at as they particularly apply to the York Northwest area. Relevant evidence from each of these documents is described in the baseline data of the relevant chapter analysis. The original Baseline Report produced for the Issues and Options Phase of the York Northwest Area Action Plan has also been referred to.

Document
York Northwest Issues and Options Baseline Report (Nov 2007)
York's Core Strategy Submission (Publication) Document (2011)
York's Dynamic Affordable Housing Model (2010)
Older Persons Accommodation Study (2010)
York's Local Climate Impact Appraisal (2010)
York Northwest AAP Issues & Options Consultation Feedback (2008)
York's Open Space Sport and Recreation Study (2008)
YNW Open Space Topic Paper (2010)
Renewable Energy Strategic Viability Study for York (2010)
City of York Climate Change Framework and Action Plan (emerging 2010)
Emerging Low Emissions Strategy (2010)
YNW Transport Topic Paper (2010)
Emerging York Local Transport Plan 3 (2010)
YNW Education Paper (2010)
York Retail Study (2008)
Yorkshire and Humber River Management Plan (2009)

³ http://www.york.gov.uk/environment/Planning/Local_development_framework/Sustainability_appraisal/

The SA Framework

- 2.9 The Sustainability Framework is a key component in completing Stage A of the SA process as it will be used as a set of criteria against which the predicted effects of the plan will be gauged. The SA is fundamentally an objective led approach whereby the potential impacts of the plan and policies are assessed in relation to a series of objectives for sustainable development. The review of relevant plans and programmes, the evolving baseline, analysis of key sustainability issues and consideration of which issues can potentially be addressed by the strategy have all been considered in the development of 22 sustainability objectives for York.
- 2.10 Figure 4 sets out the SA Objectives and which objective addresses each SEA topic. Although the objectives are referenced, e.g. EC1, no priority has been given to ranking as each objective has been seen as important.

Figure 4: SA Objectives and related SEA topics

Headline Objective		
To reduce York's Ecological Footprint		
Sub-objective: To reduce the York's Carbon Footprint		
Economic		
SEA	Objective	Sub-objective
Population	(EC1) Good quality employment opportunities available for all	<ul style="list-style-type: none"> • Provide employment opportunities for local people • Promote or support equal employment opportunities • Offer employment opportunities to disadvantaged groups • Seek to improve accessibility to employment opportunities (incorporating the provision of quality affordable housing and public transport infrastructure)
Population	(EC2) Good education and training opportunities for all which build the skills capacity of the population	<ul style="list-style-type: none"> • Promote lifelong learning and widening • Promote job creation skills and training linked to the development • Improve levels of basic skills • Build the confidence, self-esteem and capacity of individuals
Not applicable	(EC3) Conditions for business success, stable economic growth and investment	<ul style="list-style-type: none"> • Encourage investment • Enhance competitiveness • Maximise local skills • Support community-based businesses • Promote an evening economy in parts of the area to complement the town centre activity • Strengthen and diversify economic activity and promote regional economic growth
Population	(EC4) Local food, health care, education/training needs and employment opportunities met locally	<ul style="list-style-type: none"> • Ensure that essential services are accessible by non-car modes • Support the vibrancy of the City Centre • Ensure employment opportunities are accessible by public transport • Ensure that there is an adequate number of local services to cater for new development

Social		
Human Health/ Cultural Heritage/ Population	(S1) Enhance access to York's urban and rural landscapes, public open space/recreational areas and leisure and cultural facilities for all	<ul style="list-style-type: none"> • Increase provision of leisure facilities and recreation activities/venues • Increase participation in leisure and recreation activities • Improve access and affordability of local leisure and recreation facilities • Encourage participation by all user groups • Promote provision of high quality public realm • Provide additional community and leisure facilities • Increase provision of cultural activities/venues • Provide support for cultural providers and/or creative industries • Improve access and affordability of cultural facilities
Human health	(S2) Maintain or reduce York's existing noise levels	<ul style="list-style-type: none"> • Reduce noise pollution from current activities and potential for such pollution
Human Health	(S3) Improve the health and well being of the York Population	<ul style="list-style-type: none"> • Promote health and prevent ill health • Address health inequalities
Population	(S4) Safety and Security for people and property	<ul style="list-style-type: none"> • Reduce actual crime • Reduce 'fear of crime' • Reduce causes of road traffic accidents
Population	(S5) Vibrant communities that participate in decision-making	<ul style="list-style-type: none"> • Encourage engagement in community activities • Increase the ability of people to influence decisions • Improve community relations
Air/ Climatic Factors/ Human Health	(S6) Reduce the need to travel by private car	<ul style="list-style-type: none"> • Reduce the need to travel by increasing access to key resources and services by means other than the car • Provide/improve/ promote information about alternatives to car-based transport • Encourage employers to develop travel plans for staffs travel to/from work • Promote the use of car clubs • Promote a reduced car modal share target • Encourage car free and low car dependency housing • Encourage restricted parking for non-residential uses • Direct development to more sustainable locations and reduce the need to travel
Air/ Climatic Factors/ Human Health	(S7) Developments which provide good access to and encourage use of public transport, walking and cycling	<ul style="list-style-type: none"> • Ensure that new developments provide access to opportunities and facilities for all groups • Make sure that new developments provide transport/environment attractive to pedestrians and cyclists • Ensure that new developments provide better facilities for cyclists • Ensure that new developments promote new cycle and pedestrian links • Minimise the number of motorised journeys

Air/ Climatic Factors/ Human Health	(S8) A transport network that integrates all modes for effective non car based movements	<ul style="list-style-type: none"> • Reduce the need to travel by increasing access to key resources and services by means other than the car • Provide/promote/ improve information about alternatives to car-based transport • Improve access to opportunities and facilities for all groups • Encourage freight transfer from road to rail and water
Material Assets/ Human Health/ Population	(S9) Quality affordable housing available for all	<ul style="list-style-type: none"> • Housing available to people in need (taking into account requirements of location, size, type and affordability) • Improve quality of the housing stock • Increase use of sustainable design and construction in York • Reduce the number of empty and difficult to let properties
Population	(S10) Social Inclusion and equity across all sectors	<ul style="list-style-type: none"> • Address the needs of disadvantaged and minority groups • Address the needs of older and younger people • Address the needs of disabled people • Promote religious and racial understanding
Environmental		
Material Assets	(EN1) Land use efficiency that maximises the use of brownfield land	<ul style="list-style-type: none"> • Make efficient use of land (appropriate density, protect good agricultural land, use brownfield land in preference to Greenfield sites)
Cultural Heritage	(EN2) Conserve and enhance the historic environment and cultural heritage of York and preserve the character and setting of the historic city	<ul style="list-style-type: none"> • Preserve, promote and enhance local culture and heritage; • To conserve those elements which contribute to the significance of archaeological sites, historic buildings, conservation areas, historic parks and gardens and other culturally important features and their settings; • Safeguard the special character or setting of the city.
Biodiversity/ Flora and Fauna	(EN3) Conserve and enhance a bio-diverse, attractive and accessible natural environment	<ul style="list-style-type: none"> • Protect and enhance existing priority habitats and species and provide for appropriate long-term management of wildlife habitats • Increase understanding of ways to create new environmental assets and restore wildlife habitats • Increase the quality and quantity of woodland cover in appropriate locations • Promote, educate and raise awareness of the natural environment & biodiversity and promote access to wildlife on appropriate sites
Climatic factors/ Air	(EN4) Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	<ul style="list-style-type: none"> • Reduce greenhouse gas emissions from transport • Reduce greenhouse gas emissions from domestic, commercial and industrial sources • Plan and implement adaptation measures for the likely effects of climate change

Climatic factors/ Air	(EN5) Improve Air Quality in York	<ul style="list-style-type: none"> • Reduce all emissions to air from current activities and the potential for such emissions • Minimise all emissions to air from new development • Improve air quality sufficiently to allow the revocation of all existing Air Quality Management Areas (AQMAs) and prevent the need to declare further AQMAs • Provide support, advice and encouragement for the business sector to reduce emissions to air • Promote innovation and development of low emission technology based industries • Support the development of city wide low emission infrastructure (e.g buses, taxis, EV recharging network etc)
Material Assets/ Air/ Climatic Factors	(EN6) The prudent and efficient use of energy, water and other natural resources	<ul style="list-style-type: none"> • Increase efficiency in water, energy and raw material use • Develop renewable energy/resources • Increase awareness and provide information on resource efficiency • Reduce use of non-renewable resources • New buildings to be designed to be energy efficient and minimise waste • Incorporate sustainable design principles and practices including construction techniques and technologies
Material assets	(EN7) Reduce Pollution and waste generation and increase levels of reuse and recycling	<ul style="list-style-type: none"> • Increase prevention, re-use, recovery and recycling of waste • Increase awareness and provide information on resource efficiency and waste • Develop renewable energy/resources
Climatic Factors/ Water	(EN8) Maintain and Improve Water Quality	<ul style="list-style-type: none"> • Protect and enhance the area's controlled waters • Prevent pollution of the water environment
Climatic Factors/ Water	(EN9) Reduce the impact of flooding to people and property in York.	<ul style="list-style-type: none"> • Reduce risk from flooding • Manage the effects of climate change from flooding • Ensure no new inappropriate development in the flood plain • Ensure the use of sustainable urban drainage systems

Stage B, C and D: Developing, assessing and refining options with consultation

2.11 This SA report focuses on Stages B, C and D of the SA process. It should be read in conjunction with the Scoping report and baseline data for the Core Strategy as well as the previous work for the York Northwest AAP, which sets the context of the appraisal. A summary of previous options and appraisal is set out in this sections

Consultation Representations and Member Comments

2.12 A draft Sustainability Appraisal for the Former Manor School/British Sugar site accompanied the SPD on consultation between December 2010 and January 2011. Comments on the SA were received from two statutory bodies and these have been incorporated where applicable. A schedule of comments is available in Annex 3 of this report.

- 2.13 This final SPD has been amended post consultation and reporting to Members of the Council's LDF Working Group (5th March 2012) to take on board consultation and Member responses received both on the SA and the SPD itself. Where changes have occurred, these have been reported within each theme to document the audit trail of analysis under the headings:
- How Has the SPD Changed?
 - What are the sustainability implications of the changes made?
 - Have the previous recommendations been taken on board?

Where applicable, amendments have also been made to the SA Matrices in Annex 2.

Habitat Regulation Assessment (HRA)

- 2.14 The Habitat Regulation Assessment is a statutory document which determines whether the policies and proposals in plans or programmes being taken forward will have a significant effect on the integrity of European Conservation Sites, known as Natura 2000 Sites, within the vicinity of York. The European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') provides a legal framework for the protection for habitats and species of European importance.
- 2.15 Given that this SPD builds upon a strategic policy within the Core Strategy, there is no requirement to produce a separate HRA as the main issues have been assessed. An HRA has been produced to accompany the Core Strategy Submission document and can be found on the Core Strategy page of the City of York Council website via the following link: www.york.gov.uk/LDF/corestrategy.
- 2.16 The results of this document state that there is likely to be no significant effects arising from the Core Strategy's policies in relation to the European designated sites. A further Appropriate Assessment of recreational pressure at Strensall Common was undertaken given the known pressure in the future from an increase in population and the requirement for additional housing. Whilst this further assessment deemed there was likely to be no significant impacts, the issue of recreational pressure and requirements for openspace has been considered within this SA as part of objective S1 and EN3.
- 2.17 Natural England were consulted on the preparation of the Habitat Regulation Assessment and agreed the outcomes of the Core Strategy Submission (Publication) HRA in August 2011. For more information please see Annex 1 of the Habitat Regulation Assessment prepared for the Core Strategy Submission (Publication).

3 Appraisal Methodology

- 3.1 This Sustainability Appraisal aims to meet the requirements of Stage B and C of the SA Process. Chapter 4 also documents the comments and information where applicable regarding the work for the former AAP. This chapter sets out the methodology for appraisal in this report and supports the approach SEA Directive which requires the methodology to be set out clearly.

The SEA Directive requires:
A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of knowledge) encountered in compiling the required information”

- 3.2 The Sustainability Appraisal for the British Sugar SPD follows a theme based approach based upon the Sustainability objectives set out by the SA framework. Figure 5 sets out the SA objectives by the themes to be assessed and cross references these to the SEA topics set out by the SEA Directive. It should be noted that the themes are not mutually exclusive and where applicable, a cross reference will be made to other themes in the chapter. This has also meant that there is some repetition of objectives under different themes.

Figure 5: Chapter themes and associated SA objectives

SA Analysis Theme	SA objective	Relevant SEA Topics
Population	S5: Vibrant Communities who participate in decision making S9: Quality affordable housing for all S10: Social Inclusion and equity across all sectors EC1: Good Quality employment opportunities for all EC2: Good education and training opportunities for all which build the skills capacity of the population EC4: Local food, healthcare, education/training needs and employment opportunities to be met locally	Population
The Economy and Employment	EC1: Good Quality employment opportunities for all EC2: Good education and training opportunities for all which build the skills capacity of the population EC3: Conditions for business success, stable economic growth and investment	Population
Housing	S9: Quality affordable housing for all S10: Social inclusion and equity cross all sectors	Population Human Health
Social Infrastructure	S1: Enhance access to York’s urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all S2: Maintain or reduce York’s existing noise levels S3: Improve the health and well-being of the York population S4: Safety and security for people and property EC2: Good education and training opportunities for all which build the skills capacity of the population EC4: Local food, healthcare, education/training needs and employment opportunities to be met locally	Population Human Health
Transport and the pattern of movement	S6: Reduce the need to travel by private car S7: Developments which provide good access to and encourage use of public transport, walking and cycling S8: A transport network that integrates all modes for effective non car based movements	Population Human Health Air Climatic Factors Landscape

	EN4: Minimise greenhouse gas emissions and develop a managed response to the effects of climate change EN5: Improve air quality	
Culture and Heritage	EN2: Conserve and enhance the historic environment and cultural heritage of York and preserve the character and setting of the historic city S1: Enhance access to York’s urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	Cultural Heritage Landscape Population
The Environment	Headline objective: To reduce the ecological (and carbon footprints) of York EN4: Minimise greenhouse gas emissions and develop a managed response to the effects of climate change EN1: Land use efficiency that maximises the use of brownfield land EN2: Conserve and enhance the historic environment and cultural heritage of York and preserve the character and setting of the historic city EN3: Conserve and enhance a biodiverse, attractive and accessible natural environment EN4: Minimise greenhouse gas emissions and develop a managed response to the effects of climate change EN5: Improve air quality EN6: The prudent use of energy, water and other natural resources EN7: Reduce pollution and waster generation and increases levels of reuse and recycling EN8: maintain and improve water quality EN9: Reduce the impact of flooding to people and property in York	Biodiversity Fauna Flora Soil Water Air Climatic Factors Cultural Heritage Landscape

- 3.3 The appraisal has involved assessment of the principles set out in the SPD against both the themes set out by Figure 5 as well as the objectives set out in the SA framework. A matrices showing the specific analysis of the principles against each of the objectives sits within Annex 2. Relevant issues from this appraisal have been included within the theme analysis.
- 3.4 The appraisal of each policy relies on an element of qualitative and subjective assessment. The analysis has been undertaken in-house and relies upon the professional judgment of officers as well as work previously carried out for the York Northwest site. In order to understand the wider implications, evidence has also been drawn from the various evidence base documents, which have been produced to underpin the LDF and the SPD.
- 3.5 The analysis of impacts of each Policy against each objective is summarised according to a scoring system, the key for which is set out in figure 6. Whilst a scoring system is not strictly required, it helps with compliance with the SEA Directive in terms of assessing the potential impacts of the SPD against SA objectives and consequently, the SEA topics. (As this is a joint SA/SEA please refer to the SA framework to cross reference how each objective relates to each SA topic). When determining the significance of effects, consideration was given to the characteristics of the effects and the sensitivity of the receptors involved. The character of the city and sustainability issues set out in Stage A of the SA process have also been taken into account when making this distinction.

Figure 6: Appraisal Scoring System

Symbol	Likely effect on the SA Objective
++	The option is likely to have a very positive impact
+	The option is likely to have a positive impact
0	No significant effect / no clear link
?	Uncertain or insufficient information on which to determine impact
-	The option is likely to have a negative impact
--	The option is likely to have a very negative effect
I	The option could have a positive or negative impact depending on how it is implemented

3.6 The SEA Directive and SA guidance recommend that the SA puts forward a series of recommendations for additions and amendments where policies could better meet the sustainability objectives and mitigate any potential effects identified. An environmental report required under the SA Guidance should include:

“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”.

3.7 Alongside the development of the sustainability framework, potential monitoring indicators were proposed against each of the themes analysed. The original indicators have been revised in line with the Monitoring Framework set out by the Core Strategy Submission DPD.

Difficulties encountered

3.8 The key issue encountered was one of uncertainty in identifying the impacts of the policy against the sustainability objectives and their relative significance using the appraisal scoring system. In order to address this, evidence for the analysis was drawn from the LDF evidence base documents as well as the expertise of colleagues from around the Council. A key assumption was made that the options would be fully implemented although in some areas tensions have been identified between priorities. Where this is the case, the report tries to highlight the potential implications.

3.9 Another key issue has been the changing political arena and the change in the approach to planning policy. The adoption of the Localism agenda and abolition of Regional Spatial Strategies has led to uncertainty in surrounding the approach to policy previously stated at the regional level and which has led to a further review of appropriate policies at the York level. In order to deal with this, the SA relies other evidence base in order to help underpin the decisions made both within the Core strategy document and the sustainability appraisal.

Structure of this report

3.10 This SA report is set out in two parts. The first provides an audit trail of previous sustainability analysis and comments provided for the Issues and Options and Preferred Options Stages of the Area Action Plan preparation. It also details the approach taken to progress the SPD. The second is a chapter on each of the theme topics set out in the SA framework (figure 5). Each of the theme chapters is structured as follows:

- Introduction
- Relevant Sustainability Issues
- Baseline data
- Future trends
- Key SA objectives relevant
- Appraisal findings
- Post consultation Analysis

- Proposed recommendations and mitigation
- Proposed Monitoring

4 Previous work on York Northwest

- 4.1 Previously, the York Central and British Sugar site was being pursued as an Area Action Plan. As part of this process the sites went through the Issues and Options process, including a full consultation (July 2007), which was accompanied by a Sustainability Statement prepared by Nathaniel Litchfield and Partners.

Issues and Options Appraisal Summary (by Nathaniel Litchfield and Partners)

- 4.2 In order to understand the issues for the site at this time, the report followed the structure set out the AAP report and split into the following sections:
- Vision and Objectives
 - Creating a Sustainable community
 - Employment
 - Housing
 - Social Infrastructure
 - Transport and Accessibility
 - Culture and Tourism
 - Openspace and Built Sports Facilities
 - Urban Design
- 4.3 A short summary of the issues regarding these themes is set out from paragraph 4.5. The full analysis is available on the City of York website at:
http://www.york.gov.uk/environment/Planning/Local_development_framework/Sustainability_appraisal/
- 4.4 In addition to this, further analysis was undertaken of each option in-house to highlight the key positive effects, key constraints/ uncertainties and key opportunities /enhancements from each option in more detail. This information fed into the Preferred Options process before the site was changed to a strategic allocation within the Core Strategy. The Preferred Options work has been used as an evidence base for taking forward the SPD and the SA analysis. The write-up of this is available within an annex of the main report.

Summary of Issues and Options SA

Vision and Objectives:

- 4.5 The vision and objectives were well received by the SA as they aligned with the Sustainable Community Strategy and the majority of the SA objectives. It was recommended that they be revised to more fully address the environmental sustainability appraisal objectives regarding waste, flooding, use of brownfield land and reducing the impact of flooding and social objectives regarding design and affordable housing. It was also noted that the vision and objectives alone will not have an impact on the future sustainability of the York Northwest area as it is an appropriate strategy and policies that are needed to ensure these objectives can be reached and development is implemented appropriately.

Creating a Sustainable Community:

- 4.6 The section related well to the SA framework as it drew on principles set out in York's Local Agenda 21 and the Without Walls strategy Community Strategy. However, it was recommended that further work on this site should prioritise matters relating to sustainable construction, including more resource efficient buildings. It also wanted more detail in relation to climate change, particular with reference to flood risk and water efficiency technologies.

Employment:

- 4.7 The York Northwest sites were identified as having a key role to play in the delivery of employment land within York. It was acknowledged that the development of these sites would assist in achieving the economic objectives. Their status as brownfield sites also helped to achieve EN1 regarding the development of brownfield land and achieve social objectives regarding accessibility and reducing the need to use a car. It was concluded that future work on the site should place employment land where it maximises access to public transport routes to limit the impact overall on traffic and help to reduce the need to use a car.

- 4.8 The SA concluded that B1 office space was more suitable on the York Central site given its proximity to the train station and access /connections with the city centre as opposed to the Former British Sugar Site. It was also concluded that larger uses on this site for B2 or B8 use would be detrimental to the character of the city centre site but would be more suitable on British Sugar subject to scale and with an acknowledgment of the potential noise and increase of traffic movements. It was also stated that there was the potential to replace jobs on site with those similar to the ones lost with the closing of the Factory. There was a concern that the large land take-up on site of B2 and B8 uses may be in conflict with EN1 as it may not maximise the potential of the brownfield land.

- 4.9 Several options were brought forward describing the location of different types of employment land that were recognised not to be mutually exclusive and therefore it was anticipated that a combination of options may be taken forward at the Preferred Options stage. Furthermore, should the tram-train be taken forward, it was recognised that British Sugar may be suitable for B1 office use. It was also recognised that the Issues and Options document did not set out the exact amount of employment land to be accommodated on site and that this evidence would need to be inputted and taken into account at the Preferred Options stage.

Housing:

- 4.10 The AAP stated that a proportion of land at York Northwest would be allocated for housing, which would be positive in contributing to meeting the housing need within York. The main issues arising from the various housing options were in relation to density and housing mix. It was concluded that density needed to be of appropriate scale but that a higher density may be more suitable to the York Central site rather than British Sugar, particularly due to the existing sustainable transport connections. The analysis also stated that the provision of different densities in each area would help to contribute to the development of a vibrant and mixed community. In relation to this, it was also considered that the housing mix type on each site should be carefully considered to balance the overall requirement for housing with maximising the use of the site, including the need for particular types of accommodation, and the character and scale of the surrounding areas. The SA agreed the benefits in providing dwellings in line with the Strategic Housing Market Assessment as opposed to reducing or increasing the amount of houses and flats provided. It was stated that the number of affordable dwellings provided need to be carefully considered to meet the overall requirements of the city and that the balance of dwelling types and densities should be provided in order to fully achieve the SA objectives.

- 4.11 The SA recognised that the provision of the mixed use on site would also help to locate the workforce near employment opportunities. Providing local services within the development is also stated as an issue which would need to be addressed in order to meet social objectives on site. Potential conflicts were also discussed in terms of housing development potentially leading to more congestion and worsening air quality. It was stated that the preferred options would need to identify ways to reduce any potential conflicts.

Social Infrastructure:

- 4.12 The Social Infrastructure section made clear that the provision of additional local services such as retail, community, health and educational facilities would all be necessary to cater for the future needed of residents and employees on site. This approach was deemed sustainable but the following issues were raised in relation to both sites:
- The need for facilities to be accessible to the majority of people via sustainable modes of transport, including walking and cycling.
 - The scale of retail provision should be sufficient for the residents and employees on site and that only complementary retail opportunities should be provided in order to maintain the vitality and viability of the other centres.
 - Any additional facilities should not increase traffic congestion
 - New community facilities should be provided to cater for the needs of the new population and should include openspace and health care facilities as well as other community led buildings in close proximity to each other.
 - Provision of educational facilities will need to be appropriate for amount of anticipated population based upon the mix of housing types.

- 4.13 The SA deemed that the Social Infrastructure stated would help to deliver a number of SA Objectives, although it recommends that the results of the City of York Retail Study (under preparation at the time) should be used to scale the facilities on each site. Quantum's of land for other social infrastructure, except for the distribution of community and social facilities, were not provided. Positive outcomes in relation to the social infrastructure options included that it could encourage use of sustainable transport and linked trips as well as the development of a community focus/hub enabling a vibrant community. Potential conflict identified were in relation to ensuring the scale of provision, particularly retail, was not detrimental to other local centres in the city and if they were not located together, the resultant difficulties in promoting shared parking and potential vehicular movement.

Transport and Accessibility:

- 4.14 The overarching issue highlighted within the SA analysis is the promotion of sustainable travel on and through the York Northwest site. The development of this is key to the success of the development, particularly in terms of meeting social objectives for reducing the need to travel by car and also in environmental terms regarding the reduction of greenhouse gas emissions and the need to address climate change. It was deemed that the provision of a connected development in terms of public transport accessibility is one of the key ways in which it can have a positive impact on achieving more sustainable development, particularly if cycling and walking is considered from the outset.
- 4.15 Gaining increased access to the site is also highlighted as an issue through various options. The SA advocated that pedestrians and cyclists need to be considered as a priority and that any additional road access should not have significant adverse impacts on any adjacent residential areas. Alongside this, there is an acknowledgment that different transport options will also have an impact on air quality and different access

options try to avoid shortcuts through the site to the city centre, which would have a potentially negative effect on the transport network. Parking is also limited in the options to help reduce vehicle movements and promote sustainable travel.

- 4.16 Freight consolidation was also put forward as an option for British Sugar to help minimise adverse impacts environmental impacts in relation to air quality and historic character and setting. It was deemed that the next stage of the appraisal process should understand the combination of options for access and transport issues in more detail as it was evident that certain access and transport options had varying impacts on sustainability objectives. It was also recognised that impacts will need to be mitigated.

Culture and Tourism:

- 4.17 Some of the key analysis revolves around the merits of linking any additional cultural facilities in close proximity to the National Railway Museum on the York Central site in order for good access between facilities as well as to the city centre. Furthermore, the tourism benefits of a new pedestrian link would potentially offset the conflict with using openspace for improved accessibility between York Central and the City Centre. However, one of the concerns raised by the SA was around vehicle movements and the potential for increased traffic and congestion which would need to be mitigated. Improving the cultural offer of York however, would help to meet sustainability objectives regarding improving conditions for business success by encouraging visitors to stay longer in the city.

- 4.18 The SA states it is also crucial that new development gives due regard to the historic environment (objective EN2) adjacent to the site as this is one of keys to York's success as both a tourist destination and somewhere to live and work.

Openspace and Built Sports:

- 4.19 The SA acknowledged that the provision of recreational and openspace on site is fundamental to the creation of sustainable settlements and the promotion of health and well-being. Existing openspace is stated to be limited with a small area of conservation value on the British Sugar site. There are some identified sports facilities near York Central but further facilities are recognised as a necessity. The SA considers that the British Sugar site is currently poorly provided for in terms of openspace and public transport which would need to be vastly improved given the potential population numbers anticipated on site and the potential impacts from new provision. The SA stated concerns regarding access and that there is potential for conflict with S6 should additional facilities not be accessible by sustainable modes.

Urban Design:

- 4.20 The Importance of good design is acknowledged by the SA as critically important in assisting the achievement of sustainable development. The main issues picked up in the analysis were:
- Continuing consideration for the Central Historic Core Conservation Area
 - Use of sustainable design and construction techniques to minimise the use of non renewable resources and minimise greenhouse gas emissions as well as those defined by the Code for Sustainable Homes and BREEAM..
 - The relation and connectivity of developments to public realm, routes and openspaces across the sites.
 - Maximising the conservation of existing features.

- 4.21 Further to the above the SA states there is a need for new development to draw on the qualities of the historic environment but without trying to mimic them and encourage high quality architecture and design which complements the historic fabric. It also states that

there is a need to have regard for ecologically sensitive species and habitats on site as part of landscape considerations.

SA Conclusions (as stated in Issues and Options SA):

- 4.22 Overall the Issues and Options document for York Northwest contains many policy approaches that should help to ensure that new development is compatible with the sustainability appraisal objectives.
- 4.23 The Issues and Options document considers a range of topics and sets out a range of possible approaches towards these topics. It is evident from the Sustainability Statement that further work is needed to assess the implications of a range of spatial strategies, as in reality the impacts of individual policy decisions are not felt in isolation. For this reason, in determining the preferred option for development at York Northwest, it will be necessary to consider the cumulative impact of policy decisions. This will allow for further discussion of alternative approaches, in line with proper plan making , and the sustainability appraisal of alternatives to help in the selection of the preferred options.

Consultation comments on the Issues and Options Sustainability Statement

- 4.24 The statutory consultees all received the SA as part of their consultation pack on the Issues and Options Report. Comments were received from English Heritage which asked the SA to give further consideration for the following issues
- Height and density of the potential buildings
 - The impact of increased congestion on the character of the historic environment
 - Potential conflicts between the scale of development against the impact on the character and setting of the city.
 - More understanding of the historic assets and why they make York special in order to provide a comprehensive analysis against objective EN2.
- 4.25 The Council agreed that the issues raised by English Heritage will be picked up as part of this appraisal where applicable.

Preferred Options Sustainability Appraisal

- 4.26 The decision was taken in March 2010 to progress both of the York Northwest sites as Strategic Sites in the Core Strategy and produce Supplementary Planning Documents to take the site forward to fruition. Whilst the Area Action Plan (AAP) was not progressed to the Preferred Options Consultation Stage, work on appraising the different options in more depth and working towards a preferred option was undertaken and fed into the development of the Supplementary Planning Document. The sustainability appraisal documents produced as part of this process were presented to Members at the Local Development Framework Working Group alongside progress reports on the following occasions:
- LDF Working Group 15th July 2008
An initial Sustainability Appraisal was produced with more specific analysis of the initial options put forward at Issues and Options stage to accompany a progress report on the AAP's progress on the appraisal of options and moving towards Preferred Options for the site. This report covered the economic, housing, social infrastructure, cultural and stadium options put forward in the AAP. The analysis can be accessed via the following link:

<http://democracy.york.gov.uk/ieListDocuments.aspx?CId=128&MId=3619&Ver=4>

- LDF Working Group 4th October 2010
The work produced for the 25th July Working Group, together with subsequent analysis of the transport options, was included as part of the York Northwest Area Action Plan Options Appraisal report presented to Members of the LDF Working Group on 4th October 2010. The report was produced to show an audit trail of options considered in progressing to Preferred Options. The report states: “A set of criteria has been produced based on the 3 components of soundness together with other relevant factors, such as sustainability appraisal, community engagement. These are used to evaluate each option from the Issues and Options stage of work. The criteria follows relevant guidance for Development Plan Documents in PPS12, LDF Options generation and appraisal by PAS (March 2008) and by the Planning Inspectorate.”

The document can be accessed via the following link:

<http://democracy.york.gov.uk/mgAi.aspx?ID=22307#mgDocuments>

Sustainability Appraisal Analysis

5 Population

Introduction

5.1 This chapter discusses the population within York, including its composition and distribution now and in the future. Population issues underpin demand for housing, employment and social infrastructure, which are critical elements within the SPD.

5.2 Relevant Sustainability Issues

- Increasing and aging population
- Increasing and changing of household types
- Provision of housing for all
- Provision of local facilities, services and openspace

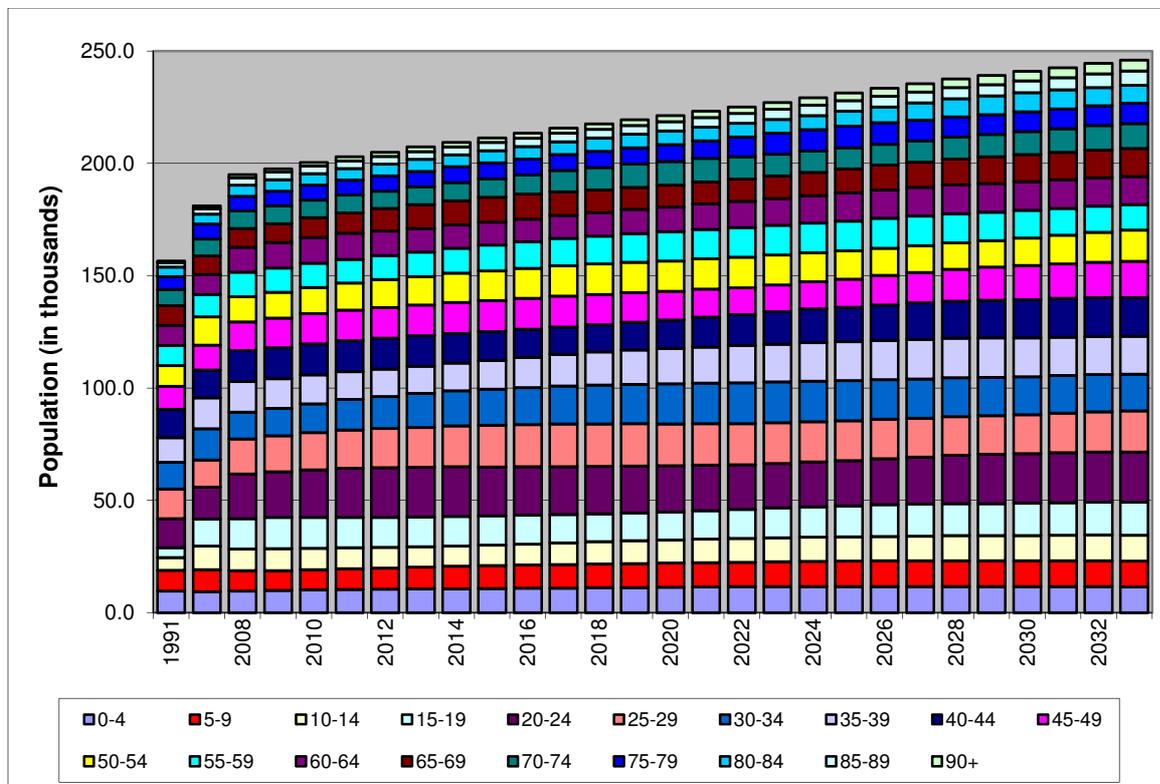
Baseline data

Issue	Baseline	Considerations for SA analysis
The increasing and aging population	The 2009 Mid Year Estimate states that York has a population of 198,800. Population projections for York (2008 based) stated that the population is expected to increase by 23% between 2008 and 2030 (see figure 7). This increase compares to a national increase of 16% over the same period. There is also an expected increase in the number of people aged over 65 in line with the national aging population trend. The cohorts expected to increase the most are for people aged 80-84 (68% increase) and 85 plus (111% increase). York has been acknowledged to have experienced one of the highest growth rates of all small cities in the country ⁴ .	Currently there is no housing on the British Site which would mean an increase in the amount of population in this area. The site will support a large proportion of population once it is developed and in planning for the population increase, a number of considerations will need to be factored in: <ul style="list-style-type: none"> ○ the complex needs of different age ○ necessary facilities and services ○ housing mix and types ○ transport solutions to make sure people are socially included and have access to amenities.
Changing household types.	The 2001 Census revealed that York had an above average number of single person households. Of these 50% were pensioner households. The 2006 based household projections show that overall the number of households in York is expected to increase between 2009 and 2031 by 30%. In the future the largest growth will be in cohabiting couples followed by houses in multiple occupation. There is also an anticipated rise in single person households. Household size is set to decrease from 2.27 persons in 2004 to 2.08 persons in 2031. The main driver for this is the increase in single person households, which is set to increase by 60% between 2006 and 2031. The implications for this	There are currently no households on the York Northwest site. Given the changing household types it will be paramount that the York Northwest site includes for a variety of household types in order to provide for the various households in the future.

⁴ Centre for Cities Report (2010)

	<p>in the future are on housing provision and types of dwelling required. It is obvious that there will need to be a mix of household types within York to accommodate the future household trends. For example, the increase in single person households will increase the overall need for housing while larger properties may be more in demand from multiple occupant living.</p> <p>The Strategic Housing Market Assessment (2006) sets out more specifically the needs for types of homes in York and who they should be aimed at. A summary of this is contained with the Housing chapter.</p>	
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Figure 7: Summary of 2008 Population Projections for York



(Source: 2008 Based Population Projections, CLG)

Future trends

- 5.3 The population of York will grow but understanding to what extent will be determined by levels of natural change and migration as well as planning policy decisions. Currently the population is estimated to be 198,800 (ONS, 2009) rising to 233,300 in 2026 and 246,000 in 2033. It is anticipated that the number of people aged 18-24 will increase as this would be inline with the student population at the higher educational establishments in York. Similarly, the number of older people is increasing which will put different pressures on service provision and housing needs.
- 5.4 Without policy intervention it is likely that the population will still grow in York and given the population projections are trend based, it is not unreasonable to assume that an increase of population will occur. Recent evidence base for York regarding a review of housing assumptions for the Core Strategy in light of the economic downturn has

indicated that migration levels have slumped and this estimate refers to a period of economic boom. This evidence suggests that the rate of growth will have reduced during the recession, mainly due to a drop in migration and therefore population growth may not be as high as indicated by the 2008 projections.

- 5.5 The Core Strategy will set a quantum target for the number of houses to be built per year until 2030. This will help deliver market and affordable homes in York to accommodate the anticipated population growth. However, this number of homes is below the anticipated growth in households and population so it will be likely that the planning policy will constrain the overall population and household growth within the city. Another issue will be the availability of affordable homes given the reduced volume of properties to be built.

Key SA objectives relevant

- 5.6 S5: Vibrant Communities who participate in decision making
 S9: Quality affordable housing for all
 S10: Social Inclusion and equity across all sectors
 EC1: Good Quality employment opportunities for all
 EC2: Good education and training opportunities for all which build the skills capacity of the population
 EC4: Local food, healthcare, education/training needs and employment opportunities to be met locally

Appraisal findings

- 5.7 Development at the Former British Sugar / Manor school site is anticipated to deliver around 1291 homes on the site and is a key site for housing provision for York for the future. Using the existing household size of 2.23 persons per household, this would equate to an additional population of nearly 2900 people.

Post Consultation Analysis

How has the SPD changed?
The population information set out under Principle 1 has been updated to reflect the latest trends. No further amendments will affect the population or its growth. The Delivery and Implementation Section does set out however, that a community forum including a range of representatives should be developed to strengthen public engagement.
What are the sustainability implications of the changes made?
The development of a community forum will have positive benefits for public participation and engagement as well as social inclusion.
Have the previous recommendation been taken on board?
n/a

Outstanding recommendations and mitigation

- 5.8 N/A

Proposed Monitoring

- 5.9 Up-to-date population projections and estimate data

6 The Economy and Employment

Introduction

6.1 Economic performance is a fundamental part of achieving sustainability. There are both positive and negative impacts on and from the economy on other sustainability factors through its development, location and type of use. Potential negative impacts may be pollution and congestion but this must be balanced against the positives of provision of employment opportunities, investment and generating wealth for local people. Given that the British Sugar site is an existing employment site and going forward as a mixed use site including employment, it is important to understand the context and impacts on the site and surrounding area.

6.2 Relevant Sustainability Issues

- Encourage sustainable economic growth
- Address areas in need of economic regeneration and stimulate growth
- Balancing job growth and number of employees
- Providing sustainable tourism
- Maintaining the viability and vitality of the City Centre

Baseline data

Issue	Baseline	Considerations for SA analysis
<p>Encourage sustainable economic growth</p> <ul style="list-style-type: none"> - high Job growth forecast within York - York to be a sub-regional centre 	<p>The Employment land Review (ELR) Stage 1 and 2 studies have forecast a large net increase in the number of jobs to be created in York over the forthcoming years. Figure ?? sets out the amount of anticipated jobs in different sectors and the overall requirement for land up until 2026. Overall, the Stage 2 ELR estimates that York will have a growth of 1000 jobs per year. The number of land and jobs associated with Office (B1a) has the highest forecast and further demonstrates York's transition away from manufacturing / B2 uses to office based businesses. The Council's support for the Science City Initiative is a key driver for this and is expected to contribute to jobs in B1 uses primarily in the future. Recent evidence from Arup for the Core Strategy suggests that this figure may have been constrained recently due to the economic downturn and that York can expect approximately 960 jobs per annum, provided that migration into York remains high.</p> <p>There are currently low levels of unemployment in the city compared to the national trend. York does have however, comparably high levels of relatively poorly paid jobs, most associated with the tourism sector. In terms of wages, there is also a discrepancy between the amount people earn and the cost of living in York. Wages in York are above the regional average currently at £31,032 per annum but below the equivalent national figure. There is also a disparity between male and female earnings.</p> <p>The preservation of York's heritage assets will also</p>	<p>The SA needs to understand the balance of the number of jobs versus the number of employees within the city and any wider impacts on the environment from commuting for example.</p> <p>Given the British Sugar site is an existing employment site, an understanding of losing the site to a mix of uses needs to be understood.</p>

	<p>be important to maintain economic growth as this forms the basis for the tourism sector in York.</p>	
<p>Provide for sustainable tourism</p>	<p>York will always be a popular tourist destination because of the high number of historic assets within the city.</p> <p>The historic environment is a primary driver of attracting people to York and needs to be protected and safeguarded, yet at the same time the city needs to be commercially successful. Having buildings in occupation is the best way to ensure they are maintained, given that the overwhelming majority are in private hands.</p> <p>York receives approximately 7 million visitors a year. This vast number, whilst good for the economy, does cause some tension due to the sheer volume of people influencing traffic congestion, maintenance of the historic assets and the environment. Attracting tourists is a sustainable way also paramount. 22.5% of visitors come to the city by train, 65.5% by car. Visitor spend and length of stay has risen faster than visitor numbers (which are basically static).</p>	<p>This SPD focuses on the development of British Sugar and Manor School for residential use with a local centre and small scale business opportunities. It is not envisaged that the development will have a great impact on tourism in the city but consideration will need to be given as to how far it enables or contributes to sustainable tourism.</p>
<p>Town centre vitality and viability, including Acomb District Centre</p>	<p>York City Centre is essentially healthy, having a low overall vacancy level and a continued high level of interest from operators. However, the city lacks a high-profile department store, a new-format supermarket and higher order fashion outlets, partly because of its historic design and layout.</p> <p>In order for the city to remain competitive nationally and within the region, it is important that the city increases its market share through the development of further retail spaces. It is paramount that any new retail development will be complementary to the existing offer and does not damage the integrity of the existing city centre offer in any way.</p> <p>It will also be paramount that in conjunction to the retail offer there will also be office and leisure uses within the city centre as this also forms part of the vibrancy of the city centre. In planning for the city centre there needs to be co-ordination of approaches between retail, business and leisure.</p>	<p>Consideration for the amount of proposed retail on both York Northwest sites and their location will need to be considered in order to not detrimentally effect the viability of the city centre or Acomb District Centre. The scale of the centre should be commensurate with the new population being accommodated and the centre should be able to meet local shopping needs.</p>
<p>Provision of working age and skilled employees in York</p>	<p>In order for the economy in York to function optimally, there will always be a need for an appropriately skilled workforce in York. Figures for 2008-09 (ONS) estimate that there are 127,000 people of working age in York aged between 16-65, 106,900 of which are economically active.</p> <p>York has 2 universities, an agricultural college, a law college and sixth form college. These institutions provide training and skills to a variety of people which will always provide skilled labour within the authority. There is a particular link between the universities and businesses associated with Science City. The University of York expansion will also provide further B1(b) uses</p>	<p>A fundamental issue is the amount of employees and the types of skills they have in order to support the economy.</p> <p>In terms of the British Sugar site it is necessary to understand the implications of development on this issue.</p>

	on site. It has also been stated that there is a link between skills and jobs which has made York more resilient to the economic downturn.	
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Figure 8: Stage 2 ELR employment / jobs projection

Use Class	Job Change 2006 –2026	Floor Space (Sq Metres) to 2026	Land Requirement (Ha)
Offices (B1a)	+ 8,592	+167,544	+13.1
R & D (B1b)	+266	+8,379	+1.05
Industry (B1c & B2)	-770	0	0
Storage & Distribution (B8)	+2130	+115,659	+28.9
Total	+10,218	+291,582	+43.05

Future trends

- 6.3 York's economy will be affected by national market conditions and to a large extent things out of the control of planning policy. However, in order to maintain this position in the region it will be necessary to develop and attract investment into the city through employment development and job growth. Planning policy for employment in the Core Strategy does not identify specific sites as this will be taken forward through the allocations document but the retail policy highlights city centre sites which will direct development to certain locations, namely Castle Piccadilly within the City Centre. It also specifies that the city wishes to create up to 1,000 jobs per year. This will help the vitality of York's economy through increasing development space for future employment and retail potentially helping York keep up with comparable centres in terms of regional attractiveness and investment.
- 6.4 Future employment development will need to encourage jobs accessible to local people to discourage high levels of in-commuting or out commuting for skilled jobs through a co-ordinated approach with Housing. Should this balance not be addressed a situation may arise where the in-commute increases into the city causing associated problems with infrastructure. The associated social and environmental impact of growth will also need to be captured.
- 6.5 **Key SA objectives relevant**
- EC1: Good Quality employment opportunities for all
 - EC2: Good education and training opportunities for all which build the skills capacity of the population
 - EC3: Conditions for business success, stable economic growth and investment
 - EC4: Local food, healthcare, education / training needs and employment opportunities met locally

Appraisal findings

- 6.6 This site incorporates a former sugar beet processing plant as well as the site of a secondary school which has been relocated. It is being redeveloped predominantly for residential development with a local centre and small scale B1 units located within the centre to ensure its viability and viability. Principles 2, 3, 8 and 9 predominantly will support the economic objectives set out above.
- 6.7 Employment opportunities will be provided in the short term through construction of the site although there are some limited opportunities for longer-term employment. Principle 3 in the SPD sets out the requirement for small scale B1 office space at the local centre, which will allow people to work in close proximity to their potential place of residence on site. Statement 7 also promotes the potential for live/work units to be

developed. As this is small scale business development, there will be limited job opportunities, although further jobs will be provided within the local centre. Larger scale business development has been deemed unsuitable given the existing provision in the city as well as the sites location and proximity to existing employment centres. The SA acknowledges that potential places of employment nearby are York Business Park, Millfield lane Industrial Estate and Northminster business Park.

- 6.8 Given that there have been job losses from the site as a result of its closure, the provision of jobs is paramount to help alleviate unemployment caused by the sites redevelopment. However, the skills required in York in the future may be different due to the changing industrial base in the city moving to more technological, research and development and tourism type industries. The SPD specifies through Statement 8 that a programme for the development of skills and training will need to be run during construction and once the development is completed relating to sustainable design. This has proved a successful scheme elsewhere in the city and the SA welcomes this approach in taking forward this site, particularly as the programme of events needs to be set out at the planning application stage. The SA anticipates that this is likely to help re-skill former workers at this site as well benefit other working age people.
- 6.9 Further to the skills and training academy proposed, there is a requirement to provide community facilities which will help to increase places where educational courses and learning can take place, helping to support the skills and training programme into the future.
- 6.10 The development of this site primarily for residential will help to provide housing for the workforce anticipated in creating a number of jobs per year within York. Supporting this workforce with various social infrastructure as well as services and facilities relating to health and well-being is paramount in ensuring conditions for economic success within York. This includes the provision of primary schools to enable education for young people on site and a nursery for very young children. Providing adequate facilities will be essential to reduce any pressures on existing facilities once the site is developed so schools can maintain and improve their educational attainment. Contributions will be sought for offsite secondary education elsewhere in the city. This is stipulated to be due to the large area required for secondary education but modelling has shown that there is sufficient capacity for secondary schools age pupils to attend schools nearby which continues the development of skills. The local centre is anticipated to not have a negative impact on the city centre as it will be for small scale shops for local provision and will help to achieve SA Objective EC4. Principle 2 primarily supports this approach.
- 6.11 In understanding the implications of the development of British Sugar and the Manor School site on York, it should be understood that transport and accessibility to and from the site for residents, commuters and visitors to the area should be undertaken in a sustainable, safe and easy way. Principle 8, 9 and 10 work to support the transport infrastructure reinforcing the need for sustainable transport modes to be accessible on site as well as pedestrian and cycle access. Principle 7 also aims to provide multi functional spaces to include pedestrian and cycle routes linked to existing routes and to the wider area. The Transport masterplan will draw together accessibility and connectivity issues taking into account vehicular access, sustainable transport and wider implications.
- 6.12 The provision of more people in York will help to supply customers for business within the city and making the workforce accessible to jobs both physically through infrastructure and mentally through appropriate training and skills will ensure that this development helps to achieve the economic objectives and issues set out by the baseline.

Post Consultation Analysis

How has the SPD changed?	
There have been no significant changes in relation to this topic although Statement 7 has amended its skills and training reference to targeted training and recruitment model set out for York and links to the potential opportunities on site	
What the sustainability implications of the changes made?	
The amendment is positive and consistent with that in the Core Strategy Submission (Publication) version. No further analysis of this theme is necessary	
Have the previous recommendations been taken on board?	
<ul style="list-style-type: none"> • Further understanding of the transport implications through the masterplanning process and its relativity to the economy needs to be undertaken, potentially in connection with LTP3. 	Yes
<ul style="list-style-type: none"> • The provision of Live/work units could be more fully explained in the text to further an explanation of statement 6. 	No
<ul style="list-style-type: none"> • The masterplanning process could locate the small business uses on upper floors of the local centre to maintain vibrancy and maximise the use of space 	Not yet relevant

6.13 Outstanding recommendations and mitigation

- Live/work units could be more fully explained in the text to further an explanation of statement 6.
- The masterplanning process could locate the small business uses on upper floors of the local centre to maintain vibrancy and maximise the use of space

6.14 Proposed Monitoring

- Monitoring the “Construction Skills Academy” programme of skill and training
- Unemployment % of working age population
- Annual audit of local centre and business facilities
- Educational attainment at Primary and GCSE

7 Housing

Introduction

- 7.1 The provision of housing will be fundamental to achieving sustainable communities and addressing any deficiencies within York currently. Evidence base suggests that there is a requirement to plan and provide for a variety of households in York to not only meet existing demand but also meet the demand for housing in the future.
- 7.2 Included within the remit of housing are links to sustainable communities and associated service provision as well as sustainable design and construction. Both of these issues will more thoroughly be examined through the Environment chapter.
- 7.3 **Relevant Sustainability Issues**
- Providing decent and affordable housing for all
 - Improving health and well-being
 - Creating sustainable communities
 - Promoting Social Inclusion and reducing inequality
 - A safe place to live

Baseline data

Issue	Baseline	Considerations for SA analysis
Provide housing for all	<p>House prices are consistently high across York and the rest of the North Yorkshire area. In 2008 the peak average house price in York was £194,000. During the economic downturn the average house price decreased to £166,623 in 2009 (January to March) compared to £124,000 in the Yorkshire and Humber region. The average house price in York in August 2010 was £186,000 which again is above the regional average. Consistently high house prices make it difficult for people to afford to buy homes as the average wages in York would not raise a mortgage enough to afford the average price for a house. York is one of 5 districts within the region where a third or more of young working households do not earn enough to raise a mortgage on a starter home. Consequently York has a high affordable housing need.</p> <p>The estimated net annual housing need in York is 1,218 per annum. Older person households show much lower levels of net need than households with children or other households. The largest demand for housing is 2 and 3 bedroom properties. In terms of tenure, the greatest demand is for owner occupied properties, followed by Social rented..</p> <p>There are currently 3,163 people on the City of York housing waiting list (as per July 2010), which also includes 600 people existing council tenants requesting a transfer. The 2007 HMA showed that in terms of affordable housing, the backlog of existing need together with projected need concludes a total affordable need of 727 households per annum over the next five years.</p>	<p>There is currently no housing on the British Sugar site. In order to address this issue it will be necessary to fully understand how the Northwest site, and British Sugar in particular, will address provision of housing within the policy.</p>

	<p>During the 2008/09, housing monitoring figures show that 130 affordable homes were completed (this includes those which came forward outside of the planning system).</p> <p>There is a growing proportion of single person households causing a drop in average household size. As household sizes decrease and there are changes in household formation, the types of property required to be built may change to suit the types of households within York</p> <p>The main priority is to provide family accommodation for affordable rent.</p>	
Provision of Decent and sustainable homes	<p>There is a clear steer from national and local planning policy that the provision of homes should be to the Government's "Decent Homes" standard. In addition to this, the "Code for Sustainable Homes" outlines sustainability measures should be included to meet the different incremental stages of the Code.</p>	<p>The SA will need to look at the provision for which these standards are included in the development of homes within the British Sugar site.</p>
Social Inclusion and sustainable communities	<p>At the heart of a sustainable community is the population which resides within it. In order to create a balanced and sustainable community, the types of housing and population residing in an area should be mixed. No one sect of society should be discriminated against in terms of housing provision, services needs or accessibility for example.</p>	<p>A discussion of how far the SPD goes in order to address housing mix and types of properties will need to be undertaken.</p>

Future trends

- 7.4 The requirement for homes in York is currently high. It is likely that the house prices, although experiencing a dip in the current market due to the recession (2008-2010), will not lower to such an extent that they become affordable for all who currently work in the city. This is likely to be a long-term problem which will heighten the need for affordable housing.
- 7.5 Core Strategy planning policy constrains the amount of land available for development overall. Land has been identified for housing, of which the York Northwest Corridor is identified and the British Sugar site is a primary site for housing delivery. The Dynamic Viability Model set out in the Core Strategy aims to deliver affordable housing by setting a percentage able to be developed for affordable dwellings whilst taking account of the sites viability and associated costs on site. Nationally the focus is on developing brownfield sites, which is a trend set to continue into the future to limit any development on greenfield sites.
- 7.6 The compulsory quality of homes provided on the British Sugar site will largely be dependent upon national guidance. Any changes to this guidance should be reflected in the development and therefore the provision of good quality and decent homes in the future. Currently, the Government's Decent Homes Standard, Lifetime Homes – Lifetime Neighbourhoods, the Code for Sustainable Homes and Building Regulations set out the criteria for the quality of housing to be provided.
- 7.7 **Key SA objectives relevant**
- S9: Quality affordable housing for all
 - S10: Social inclusion and equity cross all sectors

Appraisal findings

- 7.8 The British Sugar/ Manor School development will be primarily residential with around 1300 new homes. The provision of new homes in York is paramount in order to keep up with both market and affordable demand for homes within the city.
- 7.9 Principle 1 in the SPD specifically aims to deliver quality housing which provides a variety of different types of housing to cater for various household types. There is a focus under Statement 2 for this to mainly focus on the provision of family houses although some flatted development will be expected to maintain an overall mix of properties. This is in line with the findings of the SHMA which details that the requirement for houses is higher than flats. Consequently, the SA welcomes that the provision of housing is mainly focussed on family housing in order to meet the need identified through the evidence base whilst also acknowledging some need for flats.
- 7.10 The SA particularly supports the SPD specifying that affordable housing provision will be incorporated on site in line with the Dynamic Viability Model, as set out by the Core Strategy Policy, as well as up-to-date evidence base such as social housing waiting lists and SHMA (2007) results when negotiating for affordable homes. This should help to strengthen the case for social housing provision on site in a market where it is known that the need for affordable homes is high. As part of this negotiations, the SA welcomes the approach to support for the provision of homes for people with housing support needs across both market and affordable housing.
- 7.11 In considering the sites development it is also important that the residential element creates vibrant and inclusive communities. Statement 3 under Principle 1 sets out the intention for housing densities to reflect the different housing types and the incorporation of other design and place-making issues such as sustainable transport provision, openspace and other social infrastructure as well as amenity considerations. Theme 3 in the SPD sets these out more clearly the principle associated with social infrastructure and in openspace (analysed in more detail in Section 8 of this Report).
- 7.12 Whilst the standard of homes on site is largely governed by national guidance, the SA welcomes the inclusion of Code for Sustainable homes under Principle 4 to stipulate the level to which the development will need to adhere.

Post Consultation Analysis

How has the SPD changed?	
<ul style="list-style-type: none"> • The SPD within Principle 1 has updated the housing need requirements using up-to-date evidence base. This amends the annual affordable housing need to 790 dwellings per annum and the baseline data regarding house prices, affordable rents and overall requirements for different types of homes. • Statement 1 has been amended (underlined) to read: “<i>Affordable housing will be negotiated against current council targets for brownfield sites, <u>having regard to market conditions and an agreed economic viability assessment</u>, together with on-site developer provision secured through Section 106 Agreement</i>” 	
What the sustainability implications of the changes made?	
None. The previous SA analysis welcomed that there was a mix of dwelling type and the need to provide affordable housing on site. The updated information does not change this. Furthermore the SA accepts that the Affordable Housing Viability Model uses economic and market conditions to review targets which will be negotiated on.	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> • Principle 2 could mention ‘Lifetime Homes’ to encompass the concept for changing households and the needs for different 	Yes, under statement 2

types of accommodation.	
<ul style="list-style-type: none"> Amend Statement 2 under Principle 1 to reference the emphasis on family housing alongside provision for a cross section of the community. 	Yes
<ul style="list-style-type: none"> The SA would welcome more detail directing the level of affordable housing and other specialist homes to make sure they are full integrated within the development to aid social inclusion. 	Yes

Outstanding recommendations and mitigation

7.13 None

7.14 **Proposed Monitoring**

- Number and type of housing completions
- Number of affordable units provided

8 Social Infrastructure

Introduction

8.1 This chapter focuses on various aspects of social infrastructure. As part of the appraisal process it is important to consider the central theme of sustainable communities which has many associated issues relevant to social infrastructure.

8.2 The importance of how deprivation, services and facilities, openspace, leisure and healthcare provision interrelate will be paramount in understanding the impact against the sustainability objectives and how successful the development will be in achieving sustainability objectives.

8.3 Relevant Sustainability Issues

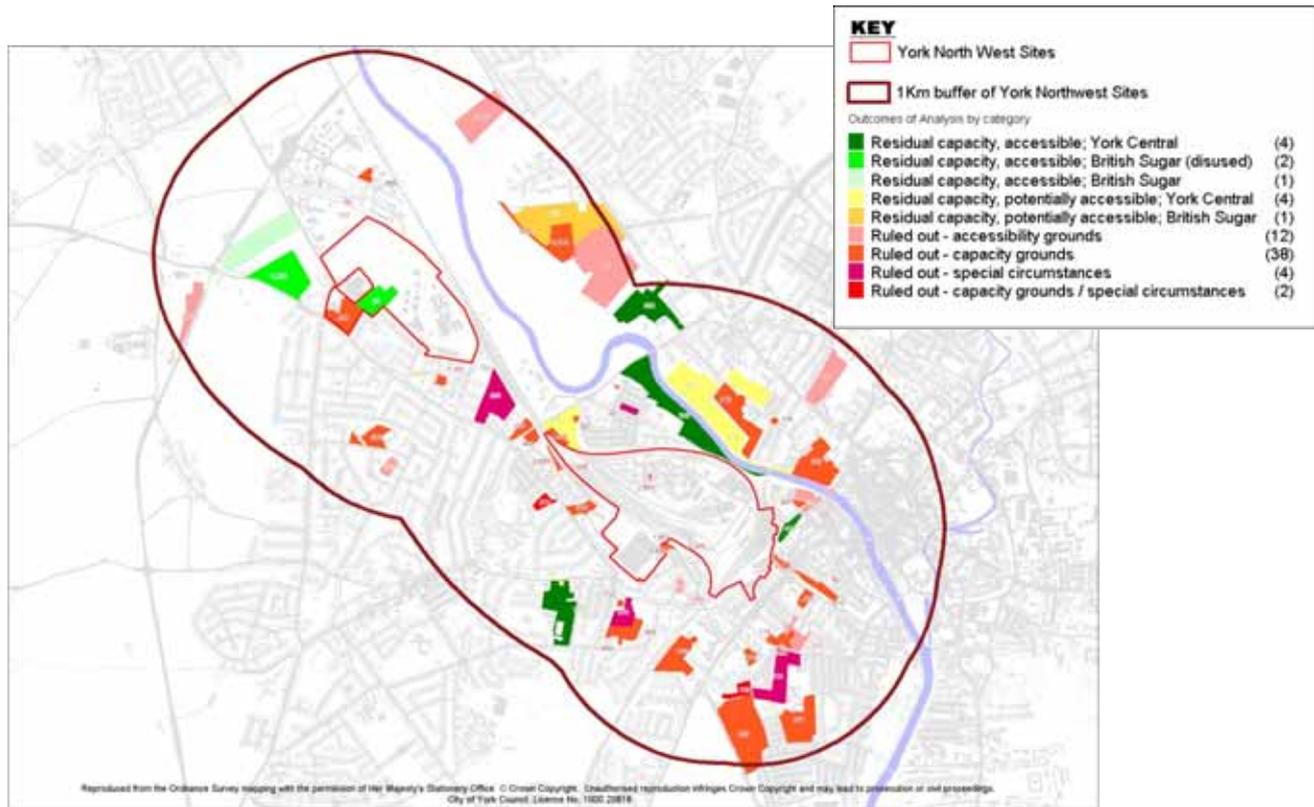
- Creating sustainable communities
- Reduce income inequality and deprivation
- Improve access to and provision of services and essential facilities, including shops, healthcare, openspace, leisure and cultural activities.
- Accessibility by public transport
- Improving health and well-being
- A safe place to live

Baseline data

Issue	Baseline	Considerations for SA analysis
Varying levels of poverty and affluence across the City	<p>The IMD 2007 has 8 Local Super Output Areas (LSOAs) that fall within the most deprived 20% nationally, 1 within the 10% most deprived. This is an improvement on the 11 LSOAs that fell within the most deprived 20% nationally in the IMD 2004.</p> <p>The City of York is ranked 242nd out of 354 areas where a rank of 1 is the most deprived in the country and a rank of 354 is the least deprived. This is an improvement on the IMD 2004 where York was ranked 219th and shows the authority has become overall less deprived. Looking at income specifically, the City of York is ranked 127th out of 354 Local Authorities, which is also an improvement from the rank of 120 in 2004. With the national average being 177 it shows York has more income deprivation than the average authority.</p>	<p>The British Sugar site does not currently have anyone living on site. Analysis should determine to what extent any issues regarding deprivation in this area will be met through the development of the British Sugar site.</p>
Improve access to services and essential facilities	<p>Further work is being undertaken to understand where there are gaps in provision of local services and facilities across York. This work is emerging through the Neighbourhood Parades Study and the Area Asset Management Plans which will also identify the types of parades and facilities which are available and the needs of the local communities around York.</p> <p>Previous work on the York Northwest development establishes that new facilities will be needed on both sites in order to provide local services in close proximity as service provision is currently ad hoc near the site.</p>	<p>In planning for the future, the facilities which need to be provided are:</p> <ul style="list-style-type: none"> ○ local shops ○ community facilities ○ healthcare ○ educational facilities. <p>Analysis will need to determine how the provision of these has been catered for through the development of the British Sugar site by way of the SPD.</p>
Improve health and well-being	<p>Generally, the health of the City is good and life expectancy continues to rise with an overall average</p>	<p>The definition of health relates to mental, physical and overall</p>

<p>through creating sustainable communities</p>	<p>life expectancy of 81.3. The average life expectancy from birth for males in York is 79.4 and for females it is 83.2. However, the population is aging and this will require additional services and facilities to support its well-being. In order for the continuation of good health, local healthcare provisions as well as spaces for recreation and leisure are required.</p> <p>The provision of openspace and recreational facilities will be particularly important on the British Sugar site. See the section below for more detailed information.</p> <p>Improving air quality in York is also inextricably linked to improving health. Fundamental to this is the need to reduce greenhouse gas emissions, particularly carbon, as well as other air pollutants such as nitrous oxides and particulate matter, The city has breached or nearly breached the set targets for NO2 in several locations resulting in 2 AQMAs in York. There are known links between air pollution and respiratory diseases, the instances of which will only improve if air quality improves.</p>	<p>well-being. Although this is a broad subject, the SA should consider how the British Sugar site will impact on people's health through development of the site for mixed use. This includes analysis of:</p> <ul style="list-style-type: none"> ○ housing, ○ openspace ○ healthcare provision ○ accessibility ○ environmental impacts on health
<p>Improving provision to openspace</p>	<p>The provision of openspace and recreational facilities will be particularly important on the British Sugar site which currently has very limited provision in close proximity. This will need to be in accordance with the PPG17 openspace standards to make sure there is adequate provision relative to the households on site and using the YNW Openspace Topic Paper (Aug 2010). Figure 10 summarises the sites to be considered. In summary, the existing site which have capacity and could be made accessible to the British Sugar site are: The Former British Sugar Sports Ground, the civic sports ground (disused) and the Clifton Park natural/semi natural greenspace.</p>	<p>The SA needs to assess whether any proposed openspace is adequate for the population living on site in the future.</p>
<p>A safe place to live</p>	<p>The number of crimes in York is decreasing year on year and the average crime rate for various offences is generally lower than the national average. The Community Safety Strategy 2008-2011 identifies the following priorities for York: Safer neighbourhoods, violent crime, drugs and alcohol and Violent Crime. Planning safety into new developments will be paramount in order to address these priorities.</p> <p>Perception of crime however is low when compared to the regional average. Of those residents surveyed, 64% felt that York is a safe place to live (2008/09)</p>	<p>The SA needs to understand how this objective how safety has been considered within the SPD in order to address this issue.</p>
<p>Improving educational attainment</p>	<p>The site will also need to make sure that there is availability in primary and secondary schools in order to cater for the uplift of numbers of children on site. The success of the development in terms of creating a sustainable community will come from how this is implemented across the site. Modelling of proposed number of households in the emerging Education Paper has indicated that:</p>	

Figure 10: York Northwest Openspace Capacity Analysis Outcome Summary Plan



Future trends

8.4 The policies set out in the Core Strategy, including the York Northwest Policy form the basis on which the principles set out in the SPD stand. The Core Strategy has policies relating to access to community facilities, educational establishments, provision of openspace etc, which will need to be adhered to throughout the city and on strategic development sites. Evidence bases set out the requirements for different elements of social infrastructure in order to achieve a vibrant and sustainable communities across York. Previous comments for the Core Strategy from the SA is that development of social infrastructure should be developed in tandem with housing and employment to make sure there is sufficient provision from the time residents inhabit the site.

8.5 Key SA objectives relevant

- S1: Enhance access to York’s urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all
- S2: Maintain or reduce York’s existing noise levels
- S3: Improve the health and well-being of the York population
- S4: Safety and security for people and property
- EC2: Good education and training opportunities for all which build the skills capacity of the population
- EC4: Local food, healthcare, education/training needs and employment opportunities to be met locally

Appraisal findings

8.6 The provision of social infrastructure on site is necessary to complement the development of a new large community in this area of the city. Principle 2 primarily sets out the requirements for which local facilities are needed on site to adequately serve the new population and ensure that there is limited pressure on existing sites in the

area. The Principle establishes that the following are required on site and may form part of the required local centre:

- A small supermarket to meet local needs
- Smaller shop units comprising a range of A2 A3 A4 and A5 Uses
- Healthcare facilities potentially including a new GP surgery, dentists, pharmacy, and/or other community services such as health visiting, school nursing and district nursing.
- Community hall facilities
- Electronic Information and workspace facilities
- Education facilities, including early years, primary, and secondary provision.
- Built sports facilities.

8.7 The SA welcomes the setting out of facilities in this way to ensure an understanding through the masterplanning process of the Council's expectations of what should be co-located with housing to make a sustainable and vibrant community. Principle 2 will primarily achieve sustainability objectives EC4 and S1. Provision of healthcare and local food provision is essential so people have access to food close by where they live as well as being able to maintain their health through access to a GP. Also, community halls will have positive effects on participation in the new community and could become the hub for functions and meetings within the area. Likewise, provision of openspace on site will provide locations for recreation and is important for health and well-being. It is acknowledged that some built sports facilities and secondary education will be provided offsite using S106 contributions as the land requirement for such facilities is large. The SA acknowledges this conflict and accepts that the success of locating these off-site will be determined through the masterplanning and development process as well as through dialogue with agencies such as Sport England and education departments. It will be paramount that any facilities off-site should be linked well with public transport and walking and cycling routes to ensure maximum accessibility from the site.

8.8 Principle 6 and 7 will be particularly important for creating areas which allow formal and informal recreation and leisure use as well as forming key routes for pedestrians and cyclists. The SA welcomes in Principle 6 the aim to create a people friendly environment and promote social and community interaction through the a framework of linked and multifunctional space. Access to a green spine and green infrastructure network will be multipurpose for both recreational and leisure purposes as well providing being key to accessibility and connectivity to social infrastructure. Key aims of Principles 7, 8 and 9 will be giving sustainable access to and between facilities and well as the wider area.

8.9 Principle 2 also includes the provision of primary schools to enable education for young people on site and a nursery for very young children. Capacity assessments indicate whilst there is some existing capacity for pupils available in the catchment area, there will need to be more facilities provided. Providing adequate facilities will be essential to reduce any pressures on existing schools once the site is developed so they can maintain and improve their educational attainment. Contributions will be sought for offsite secondary education elsewhere in the city which will be needed when the present capacity in the catchment area is filled. Currently, it is anticipated that there is capacity on catchment secondary schools until 2017 which allows the site not to include a secondary school. The SA suggests that the need for pupils is not underestimated on site and that further modelling work is undertaken alongside the masterplanning process to make sure any facility provided is adequate for the number of anticipated children.

- 8.10 Issues of safety in the provision of social infrastructure also needs to be designed in. The SA acknowledges that this will need to be undertaken as part of the masterplanning process and will depend upon the layout and design of the site. The SA welcomes that this is initiated upfront in Principle 6.

Post Consultation Analysis

How has the SPD changed?	
<ul style="list-style-type: none"> • The local centre requirements set out by Principle 2 has been amended to include a neighbourhood food store primarily to meet newly arising need instead of “a small supermarket”. • Changed Built sport hall from “will be sought” to “will be provided”. • Text following Statement 15 now includes: “In the first instance the presumption will be to provide all open space typologies within the site and ensure there is no overall loss of open space.” 	
What the sustainability implications of the changes made?	
<p>The change to the sports hall being provided on site is more definite compared to the previous wording, which the SA considers as positive for sports and recreation provision. Furthermore, the presumption now in favour of on site provision of different types of openspace is positive for health and recreational purposes. The SA considers that the SPD has strengthened its requirements for this land use.</p>	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> • Further modelling with respect to numbers of families and children be undertaken alongside the masterplanning process to make sure adequate facilities are provided for the new community’s needs. 	Not yet required

8.11 Outstanding recommendations and mitigation

- Further modelling with respect to numbers of families and children be undertaken alongside the masterplanning process to make sure adequate facilities are provided for the new community’s needs.

8.12 Proposed Monitoring

- Number of facilities developed on site
- Amount of openspace provided
- Deprivation indicator monitoring

9 Transport and the Pattern of Movement

Introduction

9.1 Sustainable transport forms a key element to the wider sustainable development agenda. The theme of transport is not mutually exclusive but feeds into other themes set out in the this sustainability appraisal. Accessibility by a more sustainable transport network will be vital in order to achieve significant elements of York’s social and environmental sustainability objectives. For example, a safe and accessible route is key to social objectives whilst a low carbon and more sustainable mode network will help to mitigate climate change and the local environment.

9.2 Relevant Sustainability Issues

- Provision of a comprehensive, accessible and sustainable transport network
- Improving access to services and facilities
- Reducing traffic intrusion and congestion
- Reduce greenhouse gas emissions (mitigating climate change)
- Improving air quality
- Improving health and well-being
- Reducing social exclusion

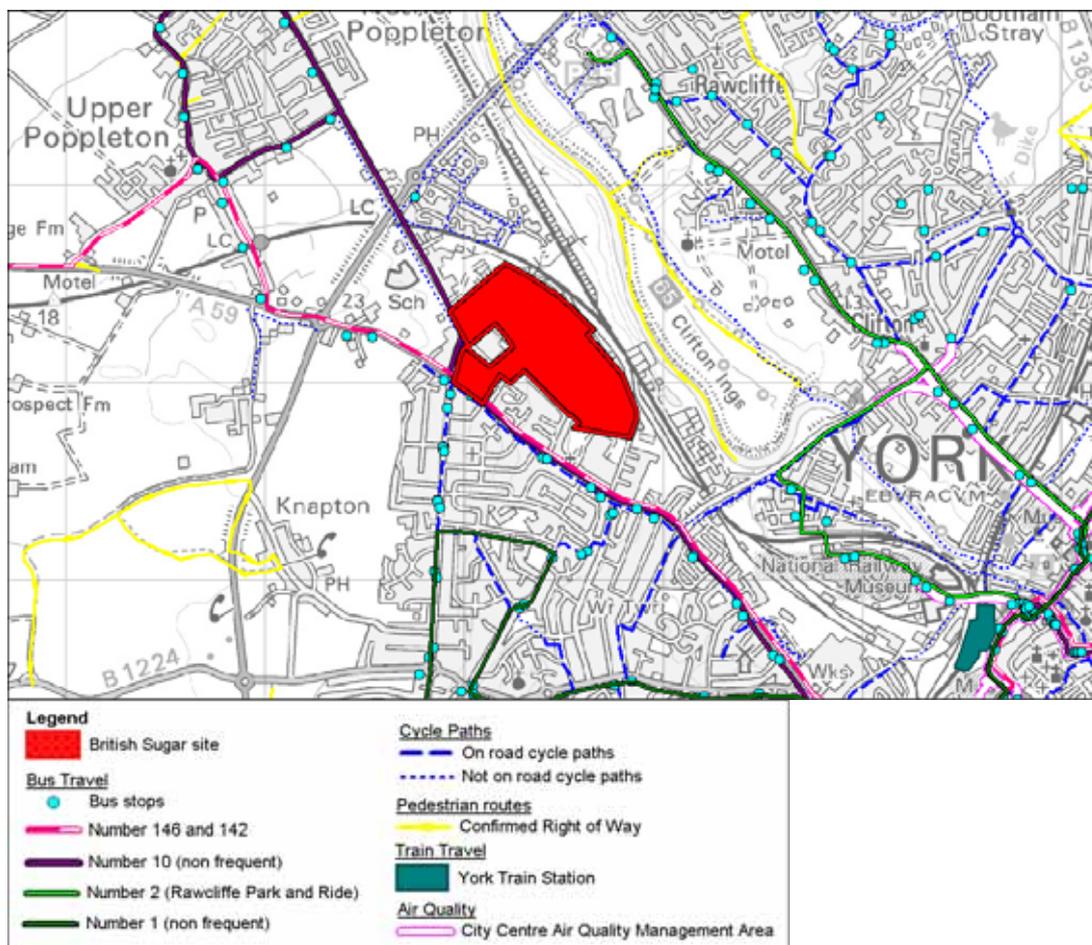
Baseline data

Issue	Baseline	Considerations for SA analysis
Provision of Sustainable transport modes	<p>Currently running alongside the British Sugar sites are a number of bus routes. The most frequent of these is the number 10 at every 20-30 minutes, whilst the majority of other routes are non frequent. (see figure ??)</p> <p>Whilst the site is adjacent to the railway line there is no current access to trains. York rail station is located approximately 1 mile to the south east of the site.</p> <p>The site itself does not currently have any transport infrastructure to support a mixed use development on it.</p> <p>The Transport Topic Paper has set out that sustainable travel modes and promoting behavioural change will be particularly important in order to minimise the impacts of development. Options included for the sustainable case put forward were:</p> <ul style="list-style-type: none"> ○ Maximising accessibility to a range of destinations via walking and cycling ○ Ensuring cyclists are accommodated with dedicated routes and segregated from pedestrians and vehicles but integrated wherever possible ○ Ensure high quality appropriate frequency public transport provision from identified origins ○ Facilitate optimal use of the Park and ride sites ○ Minimise public transport times ○ Ensure easy availability of public transport ○ Promote public transport options as the travel option for residents ○ Potential for a tram-train ○ Minimise parking availability 	<p>British Sugar will be providing a mix of uses on site that will require a transport infrastructure able to support a mix of uses, densities and populations. The SA will need to evaluate the options included within the SPD for compatibility with sustainable transport objectives as well as any social and environmental constraints.</p>

	<ul style="list-style-type: none"> ○ Reduce direct vehicular trips to the city centre ○ Establish car clubs in low parking zones ○ Promote the use of environmentally friendly vehicles ○ Mitigating the residual impacts of car users on site 	
Improving and mitigating Traffic congestion	<p>Included within any residential development will be an element of car ownership. Increasing car ownership coupled with traffic generated by new housing/employment development could increase congestion if no action is taken to manage growth.</p> <p>Some of the key radial routes around the city are also known to be at or close to capacity. It will be necessary to direct development to areas where there is greater capacity for sustainable transport movements. The Transport Topic Paper for York Northwest summarises that the Standard approach, or 'Reference Case' predicted:</p> <ul style="list-style-type: none"> ○ The impact on the transport network in terms of congestion and delay to be significant ○ It would result in a 24% increase in network delay and result in a significant number of junctions operating over capacity ○ Impacts on the strategic network, principally the A59 and the A1237, were particularly significant and would require mitigation works ○ That the "standard" approach would not deliver the objective of reducing the impact of travel on the environment." <p>The conclusions taken from this work were that development across the YNW site will have to be sustainable in order to minimise potential impacts of the development. This will require people to employ sustainable patterns of travel, achieving a high non-car modal split and network mitigation measures. A sustainable case built as a comparison showed that a number of measures, including walking and cycling, public transport and tackling privatised motor vehicles need to be implemented in order to minimise the impact of the development. This approach also identified that a positive attitude to travel behavioural change is necessary to make successful the sustainable approach drawn up.</p>	<p>The SA will need to consider the impacts of the proposals set out by the SPD in terms of the congestion implications and how far they meet the requirements set out the transport topic paper in order to cause minimum adverse impact on the city's transport network.</p>
Improve air quality	<p>Currently 26% of York's carbon emissions come from transport. In order to help tackle air quality reductions in carbon, nitrous oxide and other particulates needs to take place. The council declared its first AQMA in January 2002 due to predicted exceedances of the annual average air quality objective for nitrogen dioxide in some areas of the city, of which the main source in York is traffic. A second AQMA was declared in Fulford in April 2010 due to the continual breach of the annual average objective for nitrogen dioxide specified in Air Quality Regulations 2000. Development within York will need to take account of this and aim to limit further exceedances of air quality around the city, particularly with consideration for the development of the York Northwest corridor. The aim will be that the</p>	<p>The needs to consider the measures taken in order to minimise poor air quality on this site and how this will relate to the emerging LES. The SA should also consider what impacts the transport options will have on health related to the transport modes envisaged on site.</p>

this will be a exemplar low emission development, which will aim to minimise impacts on air quality in adjacent areas. Consideration for sustainable transport measures and support for air quality improvement measures such as electric and bio-methane vehicles and charging points need to be considered at a policy level in order to improve air quality in York. Further to this it will have added health benefits across the population. A Low Emission Strategy is currently being drawn up, which will aim to embed low emission policies into all aspects of land use and transport planning. The LES aims to accelerate the uptake of low emission fuels and technologies as well as changing lifestyles across the city to work in a low emission way. This may involve development contributions towards low emissions commercial vehicles such as lorries, waste trucks and buses used with the city. Developers will also be expected to contribute towards the cost of tackling poor air quality and use best endeavours to minimise emissions from heating/ power and transport systems. The British Sugar site is not currently monitored for air quality but all major roads in the area are monitored. The development of the site is likely to have in combination effects on air quality on these roads and the wider area which will need to be monitored. Further information regarding this is set out in section ?? on air quality.

Figure 11: Existing transport routes near British Sugar



Future trends

- 9.3 Improvements to the transport system throughout the city would occur as per those set out in the emerging City of York's Local Transport Plan 2011 and beyond (LTP3). This is due to be in place by 01 April 2011 and will replace the city's current Local Transport Plan 2006-2011 (LTP2).
- 9.4 The LDF and LTP3 are inextricably linked, as the future housing and employment rates from the Core Strategy form the crucial element in setting the long-term strategy for LTP3. Conversely, the deliverability of the strategy and actions within LTP3 will determine to a large extent how the LDF Core Strategy is realised.
- 9.5 These two complementary documents help to make improvements not only to the road network but also aim to achieve a modal shift towards using more sustainable modes of transport. In addition to this, the air quality policy in the Core Strategy will support the Climate Change Action Plan and Low Emissions Strategy to help set out ways in which to decrease carbon emissions and other air pollutants, particularly from vehicles and using low emission technologies. Promotion of cleaner fuels such as electric vehicles and associated charging points will be promoted throughout the city.
- 9.6 **Key SA objectives relevant**
- Headline objective: Reducing York's ecological and carbon footprints.
 - S6: Reduce the need to travel by private car
 - S7: Developments which provide good access to and encourage use of public transport, walking and cycling
 - S8: A transport network that integrates all modes for effective non car based movements
 - EN4: Minimise greenhouse gas emissions and develop a managed response to the effects of climate change
 - EN5: Improve air quality

Appraisal findings

- 9.7 The SPD aims to incorporate sustainable transport solutions for accessibility and connectivity into and out of the British Sugar site. Predominantly the SPD advocates walking, cycling and public transport movements above the use of the car supporting SA objectives S6, S7 and S8 as well as the headline objective regarding the eco-footprint. Evidence base has proven that a step change in transport use is necessary in order for the development to not cause excessive disruption to the existing transport infrastructure within the city and limit its environmental impact.
- 9.8 Central to the package of transport solutions is to encourage walking and cycling (together with encouraging more use of public transport) using the Green Infrastructure network set out by Principles 6 and 7. These principles set out the intention to incorporate a Green spine and linked public realm connected to the wider area to deliver safe and pleasant environments for walking and cycling. Linking this together should encourage people, particularly on shorter journeys, to avoid using the car. It will also be paramount that that these routes connect with services and facilities provided such as the local centre. Principle 2 also specifies that local facilities should be accessible via sustainable means. The success of this however will be determined through the transport masterplanning process which will need to make sure alternative modes of transport are accessible and are a realistic alternative to the car.
- 9.9 Principle 8 sets out the intention for a public transport network which connects "pedestrian, cycling, public transport and vehicular routes between the development area and key destinations", which is furthered by Principle 9's aims to facilitate the step change in using alternative modes of transport to the car. Part of this process will be to

limit access at some points in the development to public transport only and prioritising more sustainable modes above the car. It has been evidenced that the majority of trips will be towards the city centre and that the proposed measures intend to direct people around the site. Expectations are that some existing bus routes will be redirected through the site and that new bus stops will be implemented which will help to connect the site to routes to the city centre. Also, Principle 9 intends for car ownership on site to be reduced through introducing strict parking standards on the site as the evidence base shows that existing standards would cause problems on the road network and have unacceptable environmental impacts. Limiting the availability of parking aims to prioritise and encourage the use of public transport but will be dependent upon implementation and behavioural change for residents who live on the site.

- 9.10 Principle 10 advocates using electric vehicles on site. The SA supports the change to vehicles that are less damaging to the environment, to minimise adverse impacts on air quality and the ecological footprint. Incorporating vehicle charging points and dedicated parking spaces should encourage residents to choose and use electric vehicles. However, the SA identifies a potential conflict between supporting the use of more environmental friendly cars on site and objective S6 to reduce the use of cars overall. Statement 24 aims to mitigate the residual effects on the road network through a variety of proposed improvements. Improvements in the road network should be carefully managed as not to encourage further car ownership on site but will need to complement the package of measures proposed. However, the development will have some impact on the existing road network and improvements will need to be put in place in order to mitigate its effect and make the development successfully integrate into the city.

Post Consultation Analysis

How has the SPD changed?
<ul style="list-style-type: none"> • Text for statement 13 has been amended to include: <u>“These paths should have primacy within the movement hierarchy with direct routes to link main destinations to encourage modal shift from the car.”</u> • Text for statement 18 (para 7.14) has been revised to ensure that the traffic on existing routes such as Plantation Drive and Ouse Acres are restricted and monitored. It also has a new acknowledgement for issues of safety, parking and environmental attractiveness is movements are increase on the roads identified. • The text for Statement 19 (para 7.15) now clarifies that pedestrian and cycle routes can be integrated on all purpose routes as well as dedicated routes where appropriate. • Para 7.16 details the expansion of linkages from British Sugar to green infrastructure in the requirement for a new pedestrian/cycle bridge over the railway helping to link different routes together currently divided by the railway line. It is intended that this will also link to York Business Park and a potential new tram-train halt. • Para 7.17 now includes: “Shorter walk distances may also need to be considered from bus stops to community facilities etc.” • Para 7.18 now includes: “The design of the development should not prejudice future provision of a tram train facility. It is intended that the council will pursue delivery of tram-train facilities and engage with the appropriate parties to take this forward.” • Principle 9 has been amended to : <u>“Principle 9: To minimise the need to travel, but where travel is necessary, to ensure as many trips as possible are able to be taken by sustainable travel modes and to promote and facilitate modal shift from the car to sustainable forms of travel by maximising opportunities for walking, cycling and public transport use”.</u> • Safety considerations are referred to through a link to the Council’s emerging 20mph speed policy.

<ul style="list-style-type: none"> Text associated with Statement 23 has been amended to reference modelling and mitigation required/ set out by the York Northwest Transport Masterplan. It also details that ongoing monitoring will be required and provision made in the transport masterplan for further amendments should be become apparent through the monitoring. Text for Statement 23 also sets out how contributions to offset the impacts of the strategic infrastructure needed will be sought through Community Infrastructure Levy, negotiated a part of the planning process. 	
What the sustainability implications of the changes made?	
<p>The changes made in the text are positive for objective S6, S7 and S8. Through the additions and amendments the SA considers that the changes have strengthened the promotions of sustainable transport use as well as minimising travel, particularly by car. Furthermore, the York Northwest Transport Masterplan provides a further detailed evidence base for considerations and the SA welcomes its inclusion. This evidence base will be incorporated into the Transport Chapter.</p>	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> Mitigation measures will need to be fully enforced to prevent adverse effect on congestion in the area and across the city and to minimise the associated adverse environmental impacts 	Yes – text has been included. Actual mitigation not yet required.
<ul style="list-style-type: none"> The site will require a full environmental impact assessment, which should include a transport assessment for the area using the transport masterplan as a basis for analysis. 	Yes but not yet required.

9.11 Outstanding recommendations and mitigation

- The site will require a full environmental impact assessment, which should include a transport assessment for the area using the transport masterplan as a basis for analysis.

9.12 Proposed Monitoring

- Congestion monitoring in the local area and across the wider network
- Modal splits (Bus usage, cycle counts and pedestrian counts etc.)
- Parking audit
- Trip rates (for cars) to/from the development
- Air quality monitoring

10 Culture and Heritage

Introduction

10.1 The most significant of York's defining characteristics is its cultural heritage consisting of complex relationships between internationally important buried archaeological deposits, a visible built heritage from Roman to Early Modern and a suburban and rural setting which includes some of Britain's best preserved 19th and 20th century housing, medieval backs and strays and clusters of important villages. The Minster itself dominates the skyline and significant views of it can be had from a variety of locations both near and far. Both visitors and residents highly value this cultural heritage and it is a key element of the local economy and a unique international resource. The sustainable management of this cultural heritage including maintaining and enhancing the setting of heritage assets are key policy requirements.

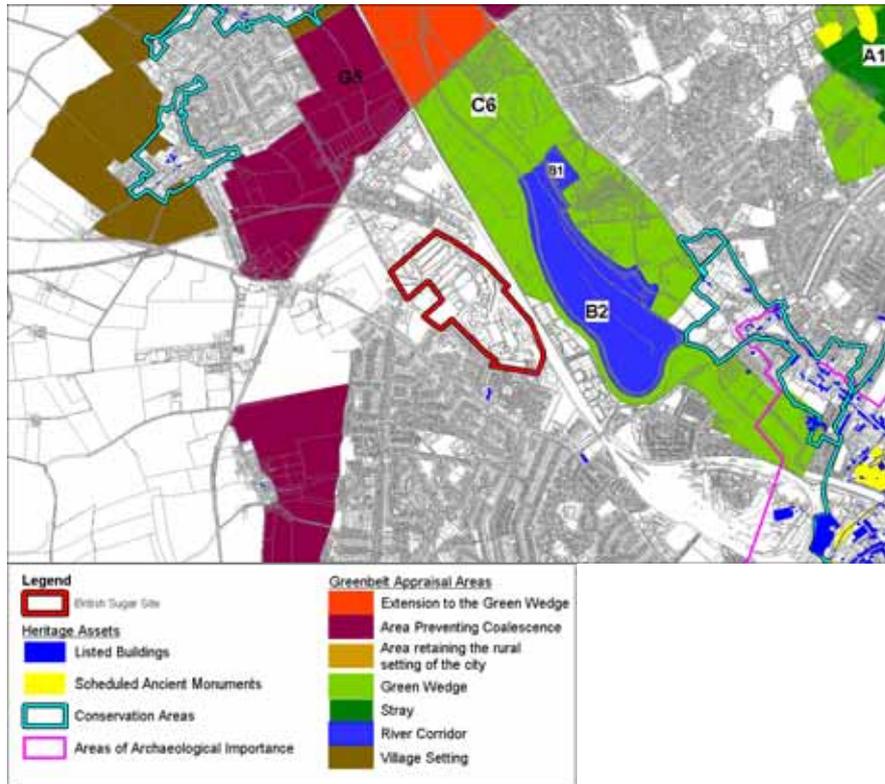
10.2 Relevant Sustainability Issues

- Protection and enhancement of the built heritage and other heritage assets.
- Protection and enhancement of the character and setting of the historic environment of the City of York

Baseline data

Issue	Baseline	Considerations for SA analysis
Protection and enhancement of York's built heritage and other heritage assets,	<p>The City, its historic core, the suburbs and surrounding countryside is a heritage rich landscape and townscape dominated by the Minster, one of Europe's most important Gothic Cathedrals. This heritage includes visible remains of the Roman, Viking and medieval city as well as York's 18th and 19th century industrial past. These heritage assets include:</p> <ul style="list-style-type: none"> ○ 35 Conservation Areas ○ 22 Scheduled Ancient Monuments ○ 1,580 Grade I, II and II* listed buildings ○ 4 registered Historic Parks and Gardens ○ 4,926 non-designated sites and monuments recorded in the Historic Environment Record ○ 121 sq km of significant or complete historic landscape set out in the North Yorkshire Landscape Character Study although the whole authority has been included within the study 	<p>The SA will need to consider how the SPD not only incorporates and respects the existing fabric and character of the city but how it will enhance existing character and make a positive contribution to future character through:</p> <ul style="list-style-type: none"> Public realm design; Building design; Greenspace provision
Protection and enhancement of the character and setting of the historic environment of the City of York	<p>The skyline of the City, views of the Minster and views towards and from its other heritage assets such as the City Walls and Clifford's Tower are key elements which contribute towards the special character of the City. This character is reinforced by the existing suburban urban forms, natural areas, green wedges and strays as well as the existing layout of roads.</p> <p>A views analysis and Historic Core Conservation Area Appraisal has now been commissioned and expected to be completed to consultation draft in April 2011.</p>	<p>The SA will need to consider how the SPD will ensure that development proposals will be informed by appropriate views and setting analysis that take account of all the setting issues.</p>
Green Belt land	<p>The Green Belt surrounding York is not adopted but has a draft boundary. There is a requirement to set a boundary for the Greenbelt around York. It will be necessary to balance the need to allow space for development into the future, which will help to provide housing and employment, against the need to protect the historic character and setting of the city.</p>	

Figure 12: Heritage assets in the vicinity of the Former British Sugar and Manor School site



Future trends

- 10.3 York has 35 existing conservation areas which have undergone an appraisal and formally identified. It is within the Council’s control whether further areas are designated or if amendments are made. It is likely that in the future, a review of the conservation will be undertaken but no areas will have this status removed. 3 of the conservation areas are currently on English Heritage’s National “At Risk” register as they are judged to have a trend of deterioration. These areas are:
 - o Towthorpe,
 - o Strensall; and
 - o The Racecourse and Terry’s Factory.

- 10.4 The city has a large number of listed buildings and scheduled ancient monuments. It is likely that this number will continue to increase as further buildings currently undesignated become of more interest. The City Council also intends to support the establishment of a Local List of historic buildings, monuments and sites.

- 10.5 The Core Strategy’s spatial principles will help direct development away from sensitive areas, such as areas identified as Greenbelt, particularly those identified in the Greenbelt Character Appraisal. In addition to this, the main policy sets out how important the different and combined elements of the historic built and natural landscape contribute to the city and the intention of preserving and enhancing these in the future. The Heritage Impact Assessment will also aid understanding of the City’s vulnerability to change by identifying what makes York special. The York Historic Core Conservation Area Appraisal and views analysis will contribute to this understanding. They will be a valuable aid in the future to evaluate large schemes against various

criteria to understand their contribution to, or impact on the city's culture and heritage overall.

10.6 **Key SA objectives relevant**

- EN2: Conserve and enhance the historic environment and cultural heritage of York and preserve the character and setting of the historic city

Appraisal findings

- 10.7 Throughout the appraisal of the SPD Principles it was apparent that design principles on site will form the basis for how this development will impact on the city. The majority of the appraisal concludes therefore that the impacts are unknown or depend upon implementation at this stage. The SA recommends that alongside the masterplanning process, a heritage impact assessment is undertaken to understand how the development will impact the city.
- 10.8 Principle 5 primarily aims to address how heritage assets and the character of the area will be considered through the design principles on site. Statement 11 considers the creating new distinctive areas within the site which would "reflect its context". The justification for this statement lists the different elements that the masterplanning process should take on board to make sure the new development has a relationship with the existing site although consideration will also be given to the wider context, character and setting of York. The SPD sets out that it requires this development to be locally distinctive with definite character areas through the masterplanning process. The SA also welcomes that a design code needs to be developed alongside the masterplanning process and would recommend that this is in tandem with understanding the impacts through the heritage impact assessment.
- 10.9 Statement 12 wishes for the site to maintain a connection to its historic use and suggests key aspects of this could be incorporated into public art and street furniture for example. The archaeological desktop survey has revealed that onsite archaeology is likely to be low but the SA recommends that any findings on site could be incorporate into the design. Inspiration for this however, could be drawn from across York to make the new community locally distinctive.
- 10.10 The SA welcomes the approach of Statement 13 whereby key views should be maintained and incorporated into the design and masterplanning of the site. The topography of York allows excellent views across the city and in order for this development to reflect its location, incorporating significant views will be important. Whilst the SA acknowledges that work through the Landscape Assessment identified key views, it will be paramount to understand how the masterplan will incorporate these and could use 3D modelling to further understand the success of this before actual development on site.
- 10.11 A key theme throughout the SPD is sustainable travel and encouraging people to use alternative modes to the car. Congestion and vehicle use on the existing road network has knock on effects on the city's historical fabric and the modal shift change should help to reduce the amount of additional traffic moving towards the city centre. Central to this will be the development of cycle and pedestrian routes within and to the wider area combined with a Green Infrastructure network. Green wedges coming into the city form part of York's distinctive character. Including Green Infrastructure and linking this into the identified green infrastructure adjacent to the site is likely to enhance the character of the green wedges as well as the urban form of the development and should prove positive for the site. This will however, depend upon implementation.

10.12 Whilst the SPD does not plan for an increase in major cultural facilities, there will be a change in social culture associated with, for example, low emission and sustainable design. This site is aiming for exemplar status in terms of sustainability through design and construction methods to create a community which has a low footprint and environmental impact. Part of this success will be with regards to transport through a modal shift away from a high dependence on the car. This will be a culture change for residents living in the new community.

Post Consultation Analysis

How has the SPD changed?	
<ul style="list-style-type: none"> Statement 3's text now includes: "For transitional residential areas adjacent to the boundaries of the site, regard will be given to the character of surrounding residential development". The wording of Principle 5 has been amended to read: "Principle 5: To create a high quality locally distinctive place which relates well to <u>both</u> the surrounding area <u>and the city as a whole.</u>" 	
What the sustainability implications of the changes made?	
Both of these changes are positive for this theme and in meeting objective EN2 of the SA framework.	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> Heritage Impact Appraisal should be undertaken alongside the masterplanning process to understand the impact on the character and setting of the city. 	Yes - but Not yet required
<ul style="list-style-type: none"> 3D modelling could be used to understand how views have been incorporated into the site. 	Not yet required

10.13 **Outstanding recommendations and mitigation**

- 3D modelling could be used to understand how views have been incorporated into the site.

Proposed Monitoring

10.14

- % of planning permissions granted against objections made by English Heritage
- Assessment of implementation of outcomes from Heritage Impact Assessment and Appraisal

11 The Environment

Introduction

- 11.1 There are many varied topic which fall within this chapter. In looking at these issues, the chapter has been subdivided into the following sections:
- Climate change
 - Water
 - Air quality
 - Biodiversity
 - Energy and Waste
 - Soils and contamination

11.a Climate Change

Introduction

- 11.2 Addressing Climate change is a key principle that needs to be embedded throughout any planning or policy development and analysis and is underpinned in planning policy through PPS1. Tackling Climate Change is a massive issue which interlinks with every aspect of development. In recent decades evidence has been collated to understand the cause and effect of climate change. It is known widely accepted that the accumulation of greenhouse gases within the earth's atmosphere help to trap in heat causing a global temperature and effects such sea level increases, increasing freak weather incidents and changes to the seasons.
- 11.3 As a result of the change in global temperature there are also indirect impacts in that it is likely to effect the availability of water resources, change and damage to biodiversity and habitats and have impacts on infrastructure and buildings. As a consequence, there would be obvious associated impacts to all aspects of sustainability.
- 11.4 Although Climate Change overlaps with other issues, any associated issues, such as flood risk, are dealt with separately although referenced where applicable.
- 11.5 **Relevant Sustainability Issues**
- Reducing York's ecological footprint
 - Reduce the impact of climate change
 - Protection and enhancement of biodiversity, the natural environment, water quality and built heritage
 - Reduce the amount of waste generated and going to landfill
 - Reduce the impact of flooding.

Baseline data

Issue	Baseline	Considerations for SA analysis
Reduce the impact on climate change	The National Performance Indicators 188 and 186 show that York is making some progress towards climate change. NPI186 shows that between 2005 and 2007 a 10.4% carbon reduction in per capita emissions took place. NPI188 shows we have achieved Level 1 of the indicator. As part of this, York has undertaken a Climate Change Impact Profile. This risk based assessment considers the significant vulnerabilities to weather and climate now and in the future. The study concludes that with changes in the	Currently the British Sugar site does not incorporate any development but is being promoted through the Leeds City Region as an Urban Eco-Settlement incorporating eco-principles and technologies. A demonstration scheme will be taken forward prior the

	<p>climatic parameters, the main and direct impact on the City of York are likely to be :</p> <ul style="list-style-type: none"> • Increased flooding (pluvial and fluvial) • Overheating • Changes to biodiversity and ecosystem health • Pressures in water resources • Increased risk of disease and pests (non human) • Increased physical stress on cultural heritage. <p>In order to limit the impact of these impacts, planning policy will need to plan to adapt to and mitigate these effects.</p> <p>York has also committed to tackling climate change through the development of the climate change Framework and Action Plan. This will form the foundation for a coordinated response to climate change across the city and aims to:</p> <ul style="list-style-type: none"> • Reduce carbon emissions and other greenhouse gas emissions in line with national and regional targets • Better prepare the city to adapt to likely future climatic changes. <p>The aspirations of this document should be embedded within the LDF in order to achieve a co-ordinated response and delivery of adaptation and mitigation measures against climate change.</p> <p>The main source of carbon dioxide is from combustion of fossil fuels is through electricity generation or vehicle emissions. Buildings are also a big source of carbon dioxide emissions in the UK. Encouraging the use of renewable energy and sustainable design and construction techniques as well as supporting and implementation sustainable travel modes will be key in addressing this aspect of climate change (see also Air Quality).</p>	<p>rest of the development to demonstrate best practice</p> <p>The SA will need to consider how any measures will deal with the baseline issues and meet the SA objectives for climate change, flood risk and reducing the eco/carbon footprints.</p>
<p>Flood risk and water management</p>	<p>Flood risk is already a threat in York. An direct impact of climate change is to change global temperature which will inevitably lead to a rise in sea level and changing precipitation patterns. This will create a heightened risk of both fluvial and pluvial flooding which new development should mitigate to limit any adverse effects.</p>	<p>The SA will consider this issue in more detail in the section on Water.</p>
<p>Increase energy efficiency</p>	<p>Given the increase in population and intentions to provide housing and employment opportunities, it is important that York plans to be increasingly energy efficient. The Code for sustainable Homes and BREEAM (for industry) help to define the building and energy efficiency standards. Currently there is limited use of large-scale renewable energy schemes within York and encouraging renewable energy and sustainable construction techniques within developments will help to increase energy efficiency.</p> <p>The emerging Renewable Energy Study will set out suitable technologies to be used in different locations around York and will need to be taken into consideration to in terms of planning for renewable energy on the Former British Sugar Site / Manor School.</p>	<p>The SA needs to assess whether the measures set out by the SPD will satisfy the sites need to provide renewable energy and minimise energy use.</p>

Future trends

- 11.6 If climate change is not addressed through policy, it is likely that the situation will exponentially get worse. The baseline sets out the results of the Climate Change impact assessment which states that the likely major impact on York will be:
- Increased flooding (pluvial and fluvial)
 - Overheating
 - Changes to biodiversity and ecosystem health
 - Pressures in water resources
 - Increased risk of disease and pests (non human)
 - Increased physical stress on cultural heritage.
- 11.7 One of the main culprits leading to climate change will be the transport sector who continue to emit greenhouse gases from their consumption of fuel. In addition to this, road traffic and congestion will continue and there is an increasing need to change peoples habits in terms of using more sustainable modes and fuel types. New more energy efficient and sustainable technologies are being explored by larger companies but the technologies are yet to be incorporated as standard.
- 11.8 It is also likely that as the population grows the need for energy will continue to increase. The future need for more energy will have a direct impact on climate change if renewable technologies are not more readily adopted. Fossil fuels are still used in the majority of power stations and will continue to have a negative impact on climate change whilst they emit greenhouse gas emissions.
- 11.9 Reducing waste going to landfill will also help to reduce the amount of methane being released into the atmosphere. Harnessing the waste for energy in the future and by promoting reuse and recycling will help to diminish this at the local level.
- 11.10 The Core Strategy sets out policies for waste, renewable energy and tries to embed climate change within each policy. As the strategic policy document it hopes to help minimise waste, increase renewable energy generation and address, mitigate and deal with the effects of climate change through various policies within the plan.
- 11.11 **Key SA objectives relevant**
- **Headline objective:** Reduce the ecological and carbon footprints
 - **EN4:** Minimise greenhouse gas emissions and develop a managed response to the effects of climate change.
 - **EN6:** The prudent use of energy, water and other natural resources
 - **EN7:** Reduce pollution and waste generation and increased level of reuse and recycling
 - **EN9:** reduce the impact of flooding to the people and property in York.

Appraisal findings

- 11.12 The SA supports the approach of Principle 4 and Statement 9 which states that sustainability standards will be the highest achievable standards and that sustainability will be embedded throughout each stage of development. The site also aims to be have urban eco-settlement status and therefore wants to incorporate further sustainability measures to achieve this in a viable way. The SA would like more clarity as to how urban-eco settlement funding set out in Statement 10 would increase sustainability standards set out by Principle 4 as currently this is inadequately explained. The SA also suggests that in order to maximise the achievement of Objective EN4 and the headline indicator, the development should maintain a high sustainability standard across the site.

- 11.13 Several of the SPD Principles aim to address specific aspects which in the long term may have adverse effects on climate change. The main environmental aspects of sustainability will be addressed through high quality design on site. This will including incorporating sustainable design, construction and technologies helping to reduce Carbon emissions and resource use with the new development. Principles 4 and 5 directly meet the headline objective to reduce the ecological footprint and objective EN4. This principle relates to ensuring the highest standards of sustainability are embedded at all stages of the development of the York Northwest site. Statement 9 in particular aims to reduce the environmental impact of development over its lifetime through sustainable design and construction. The SA welcomes in this statement the acknowledgement for current Code for Sustainable Homes and BREEAM which will incorporate increasingly high standards for materials, construction, energy and resource use throughout the design of homes, commercial and public buildings. The aim for carbon neutral homes will have a long-term positive impact on limiting environmental impacts which impact on climate change. However, whilst principle 4 does meet objective EN4, it is considered that there is no clear link specifically encapsulating how the development will deliver a managed response to climate change. The SA suggests that this needs to be addressed via incorporating adaptation design into the brief. The SA also suggests the entire site is developed at a similar high standard to maximise the extent to which it meets SA objectives regarding climate change.
- 11.14 In the long-term, the transport principles under theme 3 should also help to mitigate the effects of a new community living in this location through the development of a sustainable transport network. Interlinking sustainable transport with other pedestrian and cycle routes will help to create a network which should help to reduce the need to use the car on site and for short journeys, particularly toward the city centre. Keeping transport emissions low on site by limiting the number of parking spaces and using electric vehicles will have a positive long term impact not only on climate change but also resource and energy use. The SA acknowledges that this is subject to a step behavioural change in transport use by new residents and the success of this will only be able to be fully understood after implementation.
- 11.15 In conjunction to this, Principle 7 aims to incorporate a comprehensive Green Infrastructure network which includes multifunctional space as well as pedestrian and cycle routes. Multifunctional greenspace can help to mitigate the effects of climate change as trees and flora act as a carbon sink as well as helping to regulate temperature through shading, for example. Also, the provision of green space helps to maintain natural drainage and prevent excessive surface runoff and pluvial flooding, which York is vulnerable to in the future. However, this again depend upon design of the masterplan and the implementation of the green infrastructure. .

Post Consultation Analysis

How has the SPD changed?
<ul style="list-style-type: none"> Extensive changes have been made to the text associated with Principle 4. In particular: Para 6.2: “The Climate Change Framework outlines the objective of reducing greenhouse gas emissions within the city, with a 40% reduction in carbon dioxide emissions by 2020 and 80% by 2050. The Sustainable Community Strategy seeks to reduce York’s ecological footprint and promote more sustainable lifestyles. New development within the city should contribute towards this with low carbon development and use of renewable energy sources, using a sustainable approach to design and construction to encourage sustainable living...Consideration should be given to offsetting the impact of the

<p>development on all aspects of the natural environment previously provided by the site (eg, water retention/conservation habitat).”</p> <ul style="list-style-type: none"> • Text associated with Statement 8 now advocates solar passive design which makes the use of the site layout and buildings. This section also strengthens the requirement for development to include renewable energy generation within the masterplan as well as ensuring the development is resilient to a changing climate and well adapted for such changes as a result of this. • The SPD sets out (para 6.6) that the masterplan will have to have an associated Local Carbon Framework • The SPD clarifies that whilst the eco funding bid has not been pursued, there is still an aspiration to deliver highly sustainable homes and an eco/community hub building providing a meeting and information exchange venue as well as examples of sustainable technologies. • The text associated with statement 15 now includes in para 6.26 additional text: “Provision of green infrastructure should also demonstrate how the development will adapt to future climate change and address issues such as effect on biodiversity/habitat, rainfall variations, and the provision of cooling through the natural environment.” • Through Theme 3 there is more reference made to reducing the need to travel and low emission / sustainable travel modes. See Transport theme for further details. 	
<p>What the sustainability implications of the changes made?</p>	
<p>The reference to tackling climate change has been integrated more into the SPD with overt references to the Climate Change Framework, adaptation techniques, mitigation and offsetting measures. Furthermore, there is strengthened reference as to the requirements of renewable energy provision and ensuring buildings are sustainable from the materials they use to their energy consumption. Whilst this has been discussed in previous SA analysis, these changes will help to meet SA objective EN4 (Minimising greenhouse gas emissions and tackling climate change) and the Headline indicator (to reduce York’s ecological footprint) more definitely. The SA particularly welcomes the Local Carbon Framework to set out and agree low carbon development options in the next stages of the process.</p>	
<p>Have the previous recommendation been taken on board?</p>	
<ul style="list-style-type: none"> • Principle 4 sets an overarching theme for the whole SPD. The SA considers that this should be the first theme to be addressed within the SPD to highlight and embed this issue up front. 	<p>No. This theme has been strengthened however.</p>
<ul style="list-style-type: none"> • There is no link to develop a managed response to the effects of climate change. The SA suggests that this is addressed throughout relevant sections of the SPD via minimising, through design, the impacts of a changing climate on the built and natural environment 	<p>Yes</p>
<ul style="list-style-type: none"> • Paragraph 6.3 references sustainability as a guiding principle to development. It would be beneficial for climate change to also be referenced, particularly given that this is a fundamental cause for being sustainable. 	<p>Yes</p>
<ul style="list-style-type: none"> • The SA would like further clarity with regards to how statement 10 fits under Principle 4 as principle 4 advocates that “the <i>highest</i> achievable standards of sustainability are embedded at all stages of the development” but statement 10 states “subject to the availability of funding”. Should the approach be that areas which achieve funding are required to meet the standards of eco town principles because this provides a clear steer for development. The SA strongly disagrees that “subject to 	<p>No. However, the statement does now set out its aspiration to continue to deliver highly sustainable homes. The statement has also been revised to detail that eco-</p>

<p>funding” should be the premise for this statement as it gives a ‘get out’ clause for high sustainability standards, particularly as the justification states that this is an “exemplar scheme, which will act as a benchmark for later stages of the development.”</p>	<p>settlement funding hasn’t been available and that alternate funding may be used to provide an eco hub community building.</p>
<ul style="list-style-type: none"> • Operation is absent and it is unclear how this will be delivered. The SA recommends that this need to be addressed. 	<p>Yes. The Climate Change Framework is referenced and there is now a requirement for a Local Carbon Framework for York Northwest. Furthermore, the delivery chapter requires the planning documents to set out delivery of sustainability solutions.</p>
<ul style="list-style-type: none"> • There is no link between this principle and the objective relating to develop a managed response to the effects of climate change. The SA suggests that this needs to be addressed via incorporating adaptation design into the brief. 	<p>Yes.</p>
<ul style="list-style-type: none"> • The SA recommends that the site uses grey water systems in order to minimise water consumption. 	<p>Yes, although grey water systems are not explicitly mentioned, the SPD references water conservation and a water strategy under Principle 4.</p>
<ul style="list-style-type: none"> • The SA also recommends that cross references should be made to ensure landscaping is considered alongside climate change as a mitigation measure which can be flexible and used to adapt to the changing climate. 	<p>Yes.</p>

11.16 Outstanding recommendations and mitigation

- The SA would like further clarity with regards to how statement 10 fits under Principle 4 as principle 4 advocates that “the *highest* achievable standards of sustainability are embedded at all stages of the development” but statement 10 states “subject to the availability of funding”. Should the approach be that areas which achieve funding are required to meet the standards of eco town principles because this provides a clear steer for development. The SA strongly disagrees that “subject to funding” should be the premise for this statement as it gives a ‘get out’ clause for high sustainability standards, particularly as the justification states that this is an “exemplar scheme, which will act as a benchmark for later stages of the development.”

11.17 Proposed Monitoring

- Eco footprint modelling
- National Performance Indicators 186 and 188
- A combination of relevant indicators used in the following sections.

11.b Water

Introduction

11.18 Water use, abstraction and conservation is a topic which forms part of the essential infrastructure of any development. The efficient use of water must take into account its long-term availability and quality in order to achieve sustainable development.

11.19 Relevant Sustainability Issues

- Increase water usage efficiency
- Maintaining water quality
- Reduce the impact of flooding

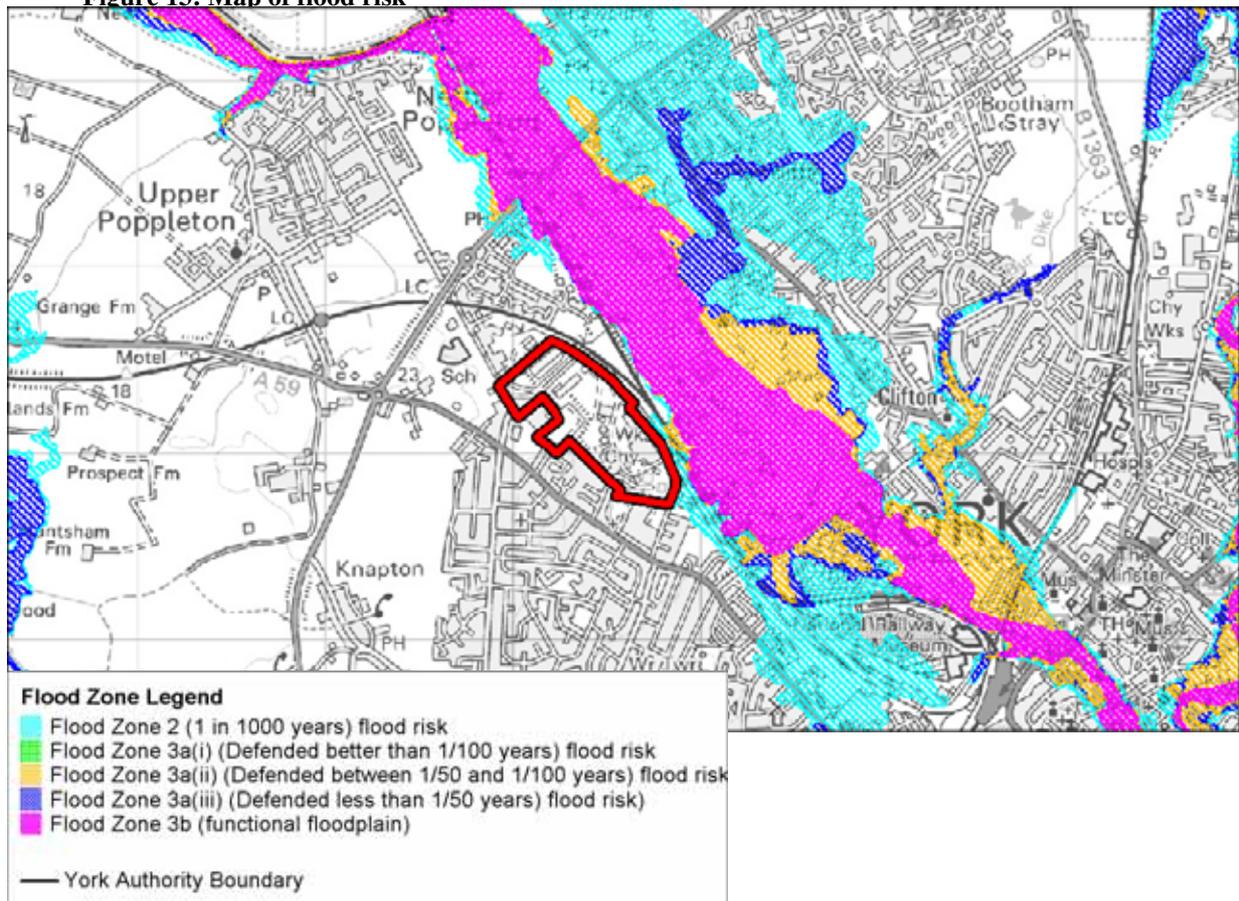
Baseline data

Issue	Baseline	Considerations for SA analysis
Flood risk	<p>Risk of flooding from both rivers and surface water runoff requires assessment and mitigation. This risk may well worsen in years to come as a result of more extreme weather events and climate changes. Flooding in York is an ongoing concern, and limiting the impact of flood risk is a key issue for the city. The city has 3 key rivers, the Rivers Ouse, Foss and Derwent, the Foss and Ouse run through and converge within the city centre. Although successful flood alleviation structures and procedures are in place it will be important to limit any potential increase in flood risk particularly that generated by new development in this area. In assessing the policies it will be important to consider the potential impact on all types of flooding across York and any mitigation factors which can be or have been incorporated. Feeding into this is the existing Strategic Flood Risk Assessment prepared as part of the evidence base for the emerging Core Strategy. The SFRA sets out different flood risk zones, a procedure for considering suitability of development and guidance on the use of Sustainable Drainage methods (SuDS) to minimise the increased load on existing drainage infrastructure. The latest flood risk map is shown as Figure 13.</p> <p>The Flood & Water Management Act (2010) makes City of York Council a Lead Local Flood Authority (LLFA) which has to work in Partnership with identified local Risk Management Authorities such as the Environment Agency, Water Companies, Internal Drainage Boards, Highway Authorities. As an LLFA we are required to 'develop, maintain, apply and monitor' a local strategy for the management of local flood risk consistent with this national strategy, including for: Surface Runoff, Groundwater and Flooding from Ordinary Watercourses. The Council has a number of duties to which it will have to carry out as part of this Act and it will be important that this work continues to feed into the evidence base for the emerging LDF.</p>	The River Ouse runs near to the British Sugar site and an assessment of its potential effects on the river, surrounding existing developed areas and the city's drainage network will need to be made using the SFRA and other relevant parts of the LDF evidence base.
Water abstraction	Water for York is abstracted from the River Ouse and River Derwent. Increase in development and population	This issue has already been evaluated in the

	<p>will lead to further water resource abstraction. The depletion of the Sherwood aquifer is a priority consideration for development in the York sub zone. Yorkshire Water's final Water Resources Management Plan 2009: "Striking the Balance" has weighed up the demand and supply of water for the forthcoming 25 years. The document forecasts demand and the measures which will help to ease any deficit in the future. The final WRMP supply-demand balance assessments showed no deficits in the dry year annual average scenarios for all three water zones. It also says that the Grid SWZ zone will remain in surplus throughout the planning scenarios both with and without the integration of the East GWZ in 2011/12. The two resource management options selected from the draft plan were the Swale groundwater source option and the River Ouse treatment works extension option. As a result of the revised demand forecast, Yorkshire Water are no longer forecasting a deficit in the supply/demand balance and remain in surplus throughout the planning period to 2034/35. This was including the potential impact of climate change on supply and demand forecasts.</p> <p>The 'Water for Life' White Paper (2012) focuses on water quality, control of abstraction and the future affordability of water provision. There is the potential that this may require 'catchment approach' to water management which pulls in quality and quantity issues (e.g. Agricultural land use change which has water quality and FRM impacts). What this means for York is currently unclear but the evidence base should be kept up-to-date of its requirements and implementation strategy.</p>	<p>Yorkshire water Management Plan. Given that this plan takes into account population growth and household changes, it is considered that SPD will not have influence on water abstraction over and above those assumptions included within the Yorkshire Water management Plan.</p>
<p>Water quality</p>	<p>The 2008 survey results from the Environment Agency state that the quality of the Rivers Ouse and Foss are very good in terms of their chemistry, biology, phosphates and nitrate concentrations. Tang Hall Beck is stated to be of lower quality than the main rivers.</p> <p>The European Water Framework Directive (WFD) also focuses on Water Quality. The WFD came into force in December 2000 and became part of UK law in December 2003. It gives us an opportunity to plan and deliver a better water environment, focusing on ecology, although the lead authority for its implementation is the Environment Agency through monitoring against set objectives and developing River Basin Management Plans . The Water Framework Directive will help protect and enhance the quality of:</p> <ul style="list-style-type: none"> • surface freshwater (including lakes, streams and rivers) • groundwaters • groundwater dependant ecosystems • estuaries • coastal waters out to one mile from low-water 	<p>The SA will need to consider if the development of the site will have an impact on water quality.</p>
<p>Water Management</p>	<p>The River basin Management Plan for the Humber River Basin District forms part of the EAs response to</p>	<p>This is ongoing work feeding into the evidence</p>

	<p>the WFD (as above). This document sets out what the pressures are facing the water environment in the Basin District and the actions that will address them. It forms the first of series of a series of six-year planning cycles. The report recognises that whilst progress has been made in mitigating previous water environment problems, a number of challenges still remain:</p> <ul style="list-style-type: none"> ○ Point source pollution from water industry sewage works ○ Diffuse pollution from agricultural activities ○ Diffuse pollution form urban sources ○ Physical modification of water bodies ○ Disused mines, point and/or diffuse pollution source. <p>This document allows partnership working by understanding local issues and actions to improve the water environment. The Swale, Ure, Nidd and Upper Ouse catchment covers York with point source discharges from industry sewage works, water industry storm discharges and diffuse pollution from agriculture the key reasons for failures in the catchment. Physical medications due to water storage and supply, urbanisation and land drainage also play a key role in determining the status of rivers and lakes in this catchment.</p>	<p>base and the SA needs to note it outcomes at this stage.</p>
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Figure 13: Map of flood risk



11.20 Key SA objectives relevant

- EN6: The prudent and efficient use of energy, water and other natural resources.

- EN8 Maintain and improve water quality
- EN9: Reduce the impact of flooding to people and property in York

Appraisal findings

- 11.21 The appraisal found that the majority of references to water in the SPD relate to water as a resource, particularly minimising consumption through design, and minimising flood risk. Statement 9 specifically sets out that two aspects important to the design of the development are: Minimising water consumption and managing surface water sustainably through a water strategy. Whilst the SA accepts this as positive in meeting objective EN6, it considers that this could be more successful through referencing examples of how to minimise water consumption such as through grey water systems for example. The inclusion of the Code for Sustainable Homes and BREEAM should ensure that sustainable solutions to minimising water consumption are incorporated into the development and help to meet the objectives.
- 11.22 Other principles should also have a positive impact on flooding in York. Whilst there is no major flood risk on British Sugar, it will be important that the development does not have an adverse impact on overall flood risk in the vicinity of the site or the wider authority, particularly given its relatively close proximity to the River Ouse. Making the development sustainable will help to minimise any adverse impacts on flooding in the long-term which may arise from climate change. In addition to this, Principle 7 sets out the Green Infrastructure Strategy which incorporates measures for blue infrastructure, including SUDs. The provision of green space helps to maintain natural drainage and prevent excessive surface runoff and pluvial flooding, which York is vulnerable to in the future. However, this again depend upon design of the masterplan and the implementation of the green infrastructure.
- 11.23 An in-combination approach to water on site involving water use, surface runoff and other flooding mitigation measures should have a positive outcome for minimising adverse impacts on all aspects of water after the implementation of the development into the future. The SA would encourage more links here with the water strategy mentioned under principle 4 and that the principles of the water strategy are set out more definitely to aid transparency and what will be required.

Post Consultation Analysis

How has the SPD changed?	
<ul style="list-style-type: none"> • Rainfall variations are to be considered in climate change adaptation techniques. 	
What the sustainability implications of the changes made?	
There are no additional sustainability comments for Water.	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> • Set out more clearly the requirements for a water strategy to accompany masterplanning 	Yes
<ul style="list-style-type: none"> • Link Principle 7 to the water strategy outlined in Principle 4. 	No. The water strategy isn't directly mentioned but there is now a reference to rainfall variations which is considered as part of the water strategy under principle 4.
<ul style="list-style-type: none"> • The SA recommends expanding on the issue of blue infrastructure and its linkages to the site. 	No.

11.24 Outstanding recommendations and mitigation

- The SA recommends expanding on the issue of blue infrastructure and its linkages to the site.

11.25 Proposed Monitoring

- Surface runoff
- Reported flooding events in local area
- % of local planning authority’s decision made against Environment Agency’s flood risk objections
- % of SuDS implemented in new developments
- EA’s Water Quality Data (chemical and Biological)
- Change in statuses from the Catchment Abstraction Management Plans.

11.c Air Quality

Introduction

11.26 The main cause of deteriorating air quality in York today is transport, with additional minor contributions from industry and commercial/domestic heating appliances. All combustion processes give rise to nitrogen dioxide and particulates - the main pollutants of local concern in York. Although the combustion of fossil fuels in vehicle engines is the main source of emissions, there is a growing contribution from the combustion of wood in domestic stoves and commercial biomass installations. Poor air quality has a detrimental impact on public health and can affect the natural and built environment in the longer term.

11.27 Relevant Sustainability Issues

- Improving air quality
- Improving health and well-being

Baseline data

Issue	Baseline	Considerations for SA analysis
Improve air quality	The Environment Act, 1995, requires Local Authorities to monitor air quality and declare Air Quality Management Areas (AQMAs) where health based air quality objective values are unlikely to be met in certain areas. The council declared its first AQMA in January 2002 due to predicted exceedances of the annual average nitrogen dioxide objective in some areas of the city. Source apportionment studies have revealed that the main source of nitrogen dioxide in York is traffic. A second AQMA was declared in Fulford in April 2010 due to further breaches of the annual average objective for nitrogen dioxide in the village. Development within York will need to take account of this, and aim to minimise emissions as far as practically possible to help prevent further air quality deterioration in the city. This requires consideration of sustainable transport measures and support for low emission technologies such as electric and bio-methane vehicles. The provision of facilities such as electric car charging points and gas refuelling facilities need to be considered at a policy level in order to reduce emissions and improve air quality in	The SA needs to consider how the British Sugar development will impact on air quality. Specifically, it will need to look at emissions of air pollutants (and resulting air quality) both on and off site. The degree to which members of the public are exposed to poor air quality is also an important consideration. Sufficient measures must in place to adequately mitigate any air quality impacts.

	<p>York.</p> <p>City of York Council does not currently monitor air quality on the British Sugar site, but an extensive network of monitors can be found on the surrounding road network. Development of the site is likely to have a dramatic impact on traffic flows in the local area. Further air quality monitoring, both in the vicinity of the site and further afield will be required. (see figures 14 and 15)</p>	
<p>Improve health and well-being of the York population</p>	<p>Generally, the health of the City is good and life expectancy continues to rise with an overall average life expectancy of 81.3. The average life expectancy from birth for males in York is 79.4 and for females it is 83.2.</p> <p>Poor air quality leads to poor human health. There are short-term effects on, for example, the respiratory system, and more serious impacts due to long-term exposure, including permanent reductions in lung function. Air pollution has been linked to asthma, chronic bronchitis, heart and circulatory disease, and cancer. Some age cohorts are also more sensitive to poor air quality, such as children and the elderly.</p>	<p>The definition of health relates to mental, physical and overall well-being. Although this is a broad subject, the SA should consider how the British Sugar site will impact on people's health through development of the site for mixed use.</p>

11.28 Monitoring is not currently undertaken on the British Sugar site, but is undertaken on all major roads in the area (Boroughbridge Rd to the south, Water End, Clifton Green and Shipton Road). Extensive monitoring is also undertaken around the inner ring road / AQMA. Traffic generated by the site during operational phases, together with the proposed site access arrangements, will inform the most suitable locations for baseline air quality monitoring.

11.29 Figure 14 shows the location of the nearest nitrogen dioxide diffusion tube monitoring locations. The results from these sites are shown in Figure 15. As can be seen current air quality in the immediate vicinity of the site is good with average concentrations well within the 40µg/m³ health based objective.

Figure 14 : Nitrogen dioxide diffusion tube monitoring sites in the vicinity of the British Sugar site

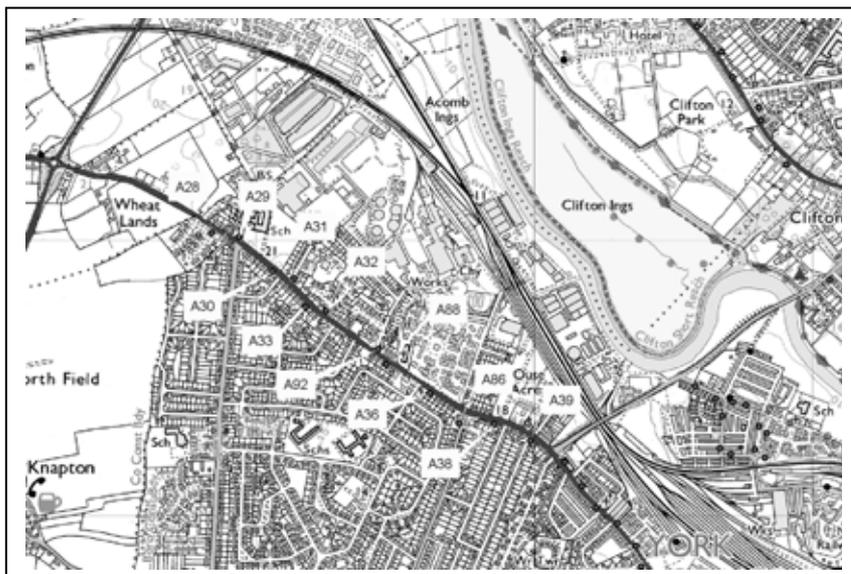


Figure 15: Nitrogen dioxide concentrations in the vicinity of the British Sugar site

Tube reference	Location	2007	2008	2009
A28	Trenchard Road -Boroughbridge Road	22.97	22.85	22.89
A29	Low Poppleton Lane	25.06	28.06	29.44
A30	Boroughbridge Road	24.54	27.84	24.87
A31	Millgates	19.84	23.74	23.37
A32	The Paddock	20.88	24.44	24.33
A33	Wheatlands Ave (previously 60 tube)	20.88	24.62	22.39
A92	Entrance to Plantation Drive	25.14	29.32	28.20
A88	111 Boroughbridge Road,	22.28	25.86	21.87
A36	Boroughbridge Road	21.93	27.28	19.45
A86	Drainpipe of 160 Carr Lane	23.15	25.68	24.81
A38	Boroughbridge Road	22.62	25.68	24.06
A39	Manor Drive North	23.49	27.81	23.51
	Average	22.7	26.1	24.1

11.30 Although air quality in the immediate vicinity of the site is good, traffic accessing the site has the potential to pass through other areas of the city where the air quality objectives are currently being breached or close to being breached. It is therefore important to ensure that the areas of maximum emission impact are identified as part of the planning process and that mitigation measures are put in place on the site to reduce this impact. This is likely to be achieved primarily by promoting alternatives to the car and by ensuring that vehicles that do use the site have the lowest emissions possible.

Future trends

11.31 City of York Council's Low Emission Strategy (LES), due for publication in 2011, will sit alongside the Climate Change Action Plan. The Climate Change Action Plan is focused primarily on reducing emissions of greenhouse gases such as carbon dioxide. The LES will aim to reduce all emissions to air and ensure a balanced approach is taken to reducing greenhouse gas emissions and managing air pollutants of specific local concern.

11.32 Areas of poor air quality are generally associated with high levels of carbon dioxide (CO₂) emissions as both types of emission arise from combustion sources. In most cases, air quality improvement measures will also reduce carbon emissions. However, some air quality improvement measures and carbon reduction policies can have conflicting outcomes so must be carefully managed. One example of this is biomass burners, which can reduce carbon dioxide emissions but can increase local emissions of nitrogen dioxide and particulates. These increases may be acceptable in rural environments where there is no population and relatively low background pollutant concentrations, but in city centre and suburban environments, single large scale biomass burners, or clusters of smaller installations can result in a deterioration in local air quality. Through the policies contained in these documents, and ongoing national advances in vehicle technology, some improvement in local air quality is likely in future years.

11.33 The Air Quality Management Areas will be in place until the health based air quality objectives for nitrogen dioxide are met at all relevant locations in the city. A 'relevant' location is a place where members of the public are regularly exposed to pollution. Monitoring of air quality around the city will continue for the foreseeable future and other AQMAs may be designated should other areas of air quality exceedance be identified.

11.34 Key SA objectives relevant

- EN5: Improve air quality
- S3: Improve the health and well-being of the York population

Appraisal findings

- 11.35 Principle 4, 7 and 9 have all been appraised to have a positive impact on air quality for different reasons. However, the SA has found that predominantly these measures relate to reduction in carbon emissions as opposed to all air pollutants apart from in the principles regarding transport where the Low Emission Strategy is referred to.
- 11.36 Principle 4 sets out sustainable design expectations, including the Code for Sustainable Homes and BREEAM. These standards aim to minimise carbon emissions leading to low emission buildings through energy efficiency and the use of renewable energy which would have a positive effect on reducing carbon. They also advocate the use of renewable energy technologies on site which will need to be suitable for the location and not have adverse impacts on air quality as some urban locations incorporating biomass can find deteriorating air quality in monitoring. Reducing the use of fossil fuels on site is likely to have positive impacts for overall air quality.
- 11.37 Principle 7 will be positive in helping to provide carbon sinks positive for both climate change and air quality. Green infrastructure could also be used to screen roads where air quality may be poorer than elsewhere on the site. It will be important that if this mitigation measure is implemented, the species of vegetation and/or trees used actively contribute to improving air quality without contributing to the formation of new pollutants.
- 11.38 Primarily, the worst influence on air quality is transport. Theme 3 regarding transport and connectivity aims to encourage a step change from journeys predominantly undertaken by car, to sustainable travel patterns and recognises that using low emission vehicles and modes will be necessary in order to minimise and mitigate adverse impacts on air quality. The Low Emissions Strategy is referenced as a source to which the SPD must adhere under Principles 9 and 10. The justification for Statement 21 refers to the transport masterplan incorporating electric vehicle charging points and the implementation and management of car clubs, incorporating electric vehicles. There is an emphasis on reducing the need to use a car on site and therefore if electric vehicles are available for use, it should help to minimise additional air pollutants emitted on the site and wider area. In this context, 'green' electricity tariffs for recharging electric vehicles is also an important consideration. Statement 23 sets out the intentions to provide the right facilities in order to enable uptake of electric vehicles on site. It also seeks to obtain off-site contributions to provide lower emission vehicles such as buses and refuse collection, in addition to provision of low emission infrastructure elsewhere in the city
- 11.39 The SA supports this approach as not only will it help to limit adverse impacts on air quality, it should also prove beneficial in preventing further deterioration in air quality, which is detrimental to the health of the population. Measures to implement this should be agreed prior to development at the planning application stage in line with the requirements of the low emission strategy.

Post Consultation Analysis

How has the SPD changed?
<ul style="list-style-type: none">• The SPD now references low carbon development and specifies that a Local Carbon

<p>Framework is required. It is anticipated that this will set out a managed approach and mitigation techniques and well as monitoring as part of the development process.</p> <ul style="list-style-type: none"> • Principle 9 (para 7.19) now acknowledges that: “Traffic from the development will have an impact on nearby air quality management areas.” • Through Theme 3 there is more reference made to reducing the need to travel and low emission / sustainable travel modes. See Transport theme for further details. 	
<p>What the sustainability implications of the changes made?</p>	
<p>The specification of a Local Carbon Framework as well as low carbon transport and construction will have positive impacts on SA objective EN5 (Improving Air Quality). Further more, there is now a clear acknowledgment that these will be an impact on air quality management zones. This goes alongside the Council’s commitment to reducing carbon emissions and is now an explicit element of the site’s development that will need mitigation. The SA welcomes this reference as it will strengthen how the development meets objective EN5.</p>	
<p>Have the previous recommendation been taken on board?</p>	
<ul style="list-style-type: none"> • Due to the potential impact on air quality across the city, alternatives to the car must be researched and strongly promoted within any scheme to develop this area. Planning applications will be expected to include measures such as provision for electric vehicle infrastructure, car clubs (incorporating electric vehicles), green travel plans and funding / monetary contributions for low emission refuse trucks and buses. City of York Council’s Sustainable Transport team should be contacted for advice. Where vehicles are considered necessary, any developer of the site should actively promote the uptake of smaller/ cleaner / low emission vehicles as far as possible via provision of necessary infrastructure and incentives for their use such as priority access, reduced charges and provision of a significant number of electric vehicle recharge points. An early discussion with the Environmental Protection Unit (EPU) is encouraged to determine low emission measures that are suitable for the site. 	<p>Yes – Theme 3 has strengthened its requirements set out in this recommendation. Also, the delivery and implementation sections sets out that a Sustainable Travel Plan and Transport Assessment is required.</p>
<ul style="list-style-type: none"> • In line with the Council’s emerging Low Emission Strategy (LES) any developer needs to demonstrate how they are meeting ‘best endeavours’ for reducing emissions on the site during both construction and operation phases. This will include a full appraisal of methods for heating and supplying power to the site to ensure that the correct technologies are chosen in terms of both carbon and local air quality emissions (NO_x and PM₁₀). 	<p>Yes through the requirement for a Local Carbon Framework</p>
<ul style="list-style-type: none"> • Prior to any works commencing on site, a construction environmental management plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall identify the steps and procedures that will be implemented to minimise the creation and impact of noise, vibration and dust resulting from the site preparation, demolition, groundwork and construction phases of the development. 	<p>Yes. In the Delivery and implementation section.</p>

11.40 **Outstanding recommendations and mitigation**

None

11.41 Proposed Monitoring

- Continue to monitor air quality on local roads in the vicinity of the British Sugar site. It is recommended that monetary contributions should be made to support the continuation of air quality monitoring in the area for a minimum of 10 years after the first occupation of the development. This will allow monitoring to be undertaken for a ten year period at diffusion tube monitoring sites used to draw up the baseline air quality data (figures 13 and 14) and allow future changes to be tracked. An assessment of traffic generated by the site during operational phases, together with the proposed site access arrangements, will inform the most suitable locations for any additional air quality monitoring considered necessary. This should be discussed with the Environmental Protection Unit at City of York Council.

11.d Biodiversity

Introduction

11.42 Biodiversity refers to life on earth at all levels, from flora to fauna and habitats to ecosystems. The main threats to biodiversity today is human interaction on both a local and global level from causing habitat loss and damage, disturbance to and pollution of ecosystems, loss of protected species and a risk to unprotected habitats. Conserving biodiversity is key in maintaining life of earth and needs to start at the local level through conservation and enhancement of existing interest.

11.43 Relevant Sustainability Issues

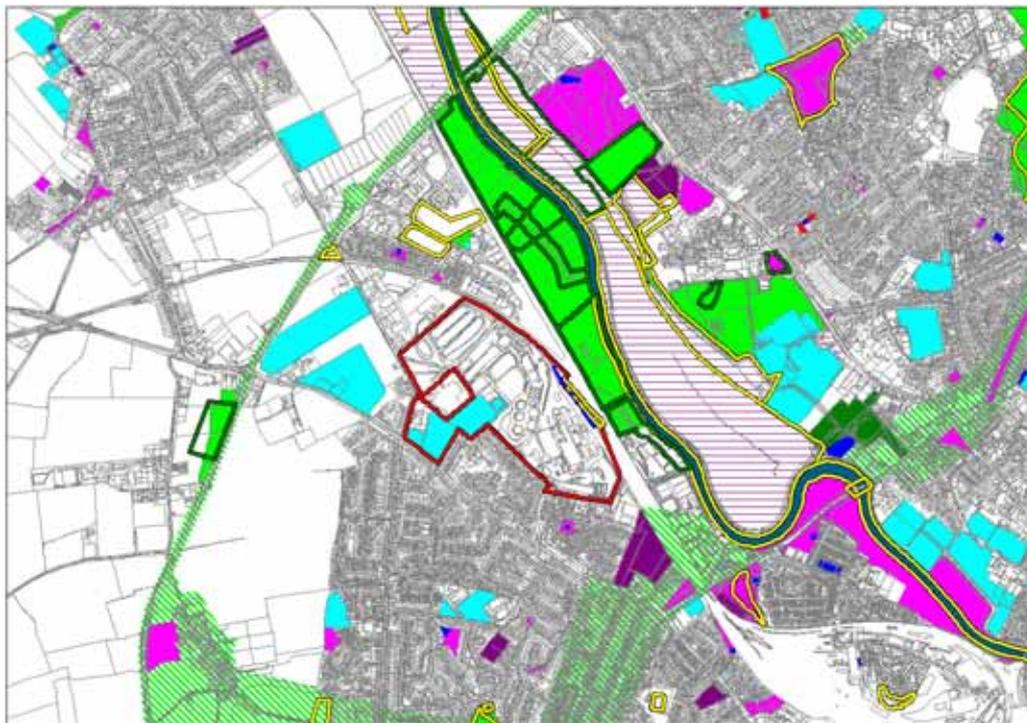
- Protection and enhancement of biodiversity and the natural environment

Baseline data

Issue	Baseline	Considerations for SA analysis
Protection and enhancement of biodiversity and nature conservation	<p>Within a relatively small area, City of York boasts a range of sites and habitats, which provide for some of Britain’s rarest breeding birds and a diverse range of plant life and are recognised as being of exceptional nature and conservation value. They include ancient flood meadows, species-rich grasslands, lowland heath, woodlands and wetlands.</p> <ul style="list-style-type: none"> ▪ 9 SSSIs covering a land area of over 895 hectares. ▪ 3 sites of international importance which comprise 3 Special Areas of Nature conservation and also a Special Protection Area ▪ 1 RAMSAR site <p>City of York have also completed a biodiversity audit whereby 101 Sites of Importance for Nature Conservation have been identified. These are strategically important sites that also need to be recognised for their value. New development should not affect the integrity such sites or the favourable status of important</p>	<p>The SA will need to consider how the site will effect nature conservation. Particular emphasis will need to be given for the ‘bee bank’ and what contribution the site will make to biodiversity overall.</p> <p>Impacts on the internationally important sites have been taken into consideration by the Habitat Regulation Assessment for the Core Strategy.</p>

	<p>species..</p> <p>On the British Sugar site, an area has been identified as a Site of Importance for Nature Conservation due to its population of rare Aculeates (bees, wasps and ants), including a regionally scarce bee <i>Melecta albifrons</i> (Cuckoo Bee). (see figure 16). The site identified covers just the bank in which the bees breed, however, an undefined area around is also of value covering the foraging range of the bees.</p> <p>Elsewhere within the site are other areas of interest which support a variety of birds mammals and other invertebrates. These are not considered to be of specific conservation value although further evidence prior to development will need to established their value in the local context. Where feasible, these should be incorporated into the overall design of the site.</p>	
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Figure 16: Nature Conservation and the Bee bank at British Sugar



Legend		
	Former British Sugar / Manor School Site	OpenSpace
	Rivers in York	
Nature Conservation		
	Bee Bank	
	All SINC Sites 2010	
		Green Infrastructure

Future trends

- 11.44 The emerging Habitat Regulation Assessment for the Core Strategy Submission document established that there would be no significant effects on the internationally important Natura 2000 sites through further development at the York North West site. The Core Strategy will continue to retain, protect and maintain the local nature conservation interest within York.
- 11.45 No development at the York Northwest site would lead to a continuation of the current situation with regard to the present wildlife interest. Development of the site may effect the normal patterns for some of this interest. Also, the Bee Bank has been designated as a Site of Interest to Nature Conservation within the Biodiversity Audit and will therefore continue to be significant on the site in the future regardless of development.
- 11.46 **Key SA objectives relevant**
- o EN3: Conserve and enhance a biodiverse, attractive and accessible natural environment

Appraisal findings

- 11.47 The appraisal has identified that the overall effect on biodiversity will be determined upon implementation of the development and the design for Green Infrastructure within the masterplanning process. Principles 4, 6 and 7 are predicted to have a positive impact on biodiversity although as stated, this will depend upon implementation.
- 11.48 Principle 7 recognises the importance of the Bee Bank and that it has important nature conservation value. The SPD supports the maintenance of this site through requiring the developer to assess and demonstrate to the Council how this area will be maintained and protected. The SA supports this approach but would like to strengthen it in the SPD by requiring that a buffer of a least 20m of greenspace is used adjacent to the bank in order to protect the rare bee populations identified. Creation of natural habitat in this area would help to protect the bee bank and also link it to a wider greenspace network . in and around the site to create a natural corridor within this wider area, linking into the green spine proposed in the SPD. This would benefit both the identified bee species and other wildlife.
- 11.49 Creation of a green infrastructure network is supported by the SA as positive for biodiversity and the natural environment. It is envisaged that as part of the multifunctional greenspaces to be provided, different habitats should be created to encourage biodiversity and provide links in the biodiversity network of sites across York. Although some natural; and semi-natural greenspace may be proposed off-site, the SA anticipates that some natural and semi natural greenspace will be established within the site and, in conjunction with other greenspaces and residential gardens, will promote and attract flora and fauna to the area.

- 11.50 Principle 7 also acknowledges the importance of trees on the site and that some are identified with tree preservation orders on the Manor School site. Whilst no trees are protected within the rest of the site, the SA supports the approach that the SPD takes in retaining any trees of value on site, particularly where they may provide amenity value and where a link has been made between incorporating them into the proposed green spine and any retained green assets under statement 18. The SA also supports the approach that new trees are required through the SPD to be planted on openspace sites to complement those retained. However, the SA would suggest amending this wording to make sure this is interpreted not just for openspace sites but throughout the site using a planned landscape / tree planting scheme linked into the wider green infrastructure network.
- 11.51 The SA remains unsure about the effects and potential conflict of transport movements in relation to biodiversity. If transport improvements to the area effect any greenspace which has biodiversity value, there will need to be mitigation. Promoting sustainable transport modes, including walking and cycling, should help to reduce pollution and noise disturbance but may encourage interference on any existing natural habitats. The main concern will be with the existing bee bank and conserving the integrity of the site for the rare species identified. The extent to which the development is successful in not having adverse effects on the natural environment will be dependent upon the design and layout of the site. Understanding this at the masterplanning stage is critical.
- 11.52 Whilst the SA supports the inclusion of blue infrastructure (waterways etc) and it associations, a further explanation of what this entails for the British sugar site and biodiversity would be welcomed.

Post Consultation Analysis

How has the SPD changed?
<ul style="list-style-type: none"> • Principle 4 now sets out that: “Consideration should be given to offsetting the impact of the development on all aspects of the natural environment previously provided by the site (eg, water retention/conservation habitat)” in relation to delivering the highest level of sustainability • The Bee Bank on site is now recognised as a Site of Interest for nature Conservation (SINC). • Statement 15 (para 6.26) has additional wording: “Provision of green infrastructure should also demonstrate how the development will adapt to future climate change and address issues such as effect on biodiversity/habitat, rainfall variations, and the provision of cooling through the natural environment.” • The provision of an additional pedestrian/cycle bridge from British Sugar across the Railway into Clifton Ings. • The development of the site will also have to take account of an emerging Tree Strategy as referenced in text associated with Statement 17. • As part of the Delivery and Implementation the SPD requires that: “The provision of strategic landscaping including green infrastructure should be specified within the overall masterplan.”
What the sustainability implications of the changes made?
<p>The SA welcomes the recognition of formal designation of the Bee Bank for nature conservation and stands by previous comments relating to ensuring that this is buffered thoroughly in order for its protection. It also welcomes further acknowledgment for consideration of the need to mitigate /offset the potential impacts from developments for nature conservation and biodiversity in several places within the SPD. The SA also welcomes</p>

<p>that a Tree Strategy is emerging for the site as this will promote biodiversity and protect existing trees as well as the SPD requiring that Strategic Landscaping is considered at the beginning of the planning process. All of these elements are positive for SA Objective EN 3 (Conserve and enhance a biodiverse, attractive and accessible natural environment).</p> <p>The SA remains unsure of the potential impact of transport schemes connected with the site. The new potential bridge would have to for example show how potential impacts were to be mitigated. The SA however, does welcome more explicit regard for the impacts on the natural environment.</p>	
<p>Have the previous recommendation been taken on board?</p>	
<ul style="list-style-type: none"> In addition to ensuring the retention of existing areas which provide valuable habitat, it is recommended that greenspaces interlink throughout the site to form a network and that, where appropriate, landscaping schemes use native species and wildlife planting. 	<p>Yes although explicit schemes will need to be submitted alongside the planning application.</p>
<ul style="list-style-type: none"> The long-term management plan should consider how the landscape and Green Infrastructure network on the site could be managed in a way that promotes biodiversity. 	<p>Yes.</p>

11.53 Outstanding recommendations and mitigation
None

11.54 Proposed Monitoring

- None Proposed

11.e Energy and Waste

Introduction

11.55 Energy consumption is a major issue for the future. Minimising the use of fossil fuels and maximising the use of renewable energy sources across new and old development for commercial and domestic use is important in order to mitigate climate change and other environmental impacts. In addition to this, the minimisation, reuse and recycling of waste is increasingly recognised as fundamental to minimise resource use. Additional environmental impacts from waste associated with landfill are increasingly being addressed through implementation of the waste hierarchy and more stringent methods for disposing of waste which need to be continued to be delivered to the public.

11.56 Relevant Sustainability Issues

- o Headline objective: Reduce York’s ecological and carbon footprint
- o Increase energy and water usage efficiency
- o Decrease the use of non renewable energy and increase the generation of renewables
- o Decrease levels of waste generated and going to landfill
- o Increase levels of waste generated and going to landfill.

Baseline data

Issue	Baseline	Considerations for SA analysis
Increase energy	Given the increase in population and intentions to provide housing and employment opportunities, it	The SA will need to consider how far the SPD

<p>efficiency</p>	<p>is important that York plans to be increasingly energy efficient. The Code for sustainable Homes and BREEAM (for industry) help to define the building and energy efficiency standards. Currently there is limited use of large-scale renewable energy schemes within York and encouraging renewable energy and sustainable construction techniques within developments will help to increase energy efficiency.</p> <p>The British Sugar site is being taken forward as an exemplar sustainable development with an initial development of eco-town status homes which will have to adhere to strong sustainability principles, including the provision of renewable energy.</p> <p>The emerging Renewable Energy Study should also set out technologies and suitable areas for implementing renewable energy in York This should form part of the baseline evidence and be taken into consideration when it is available.</p>	<p>goes in stipulating the provision for renewable energy on site and the potential outcomes in the future.</p>
<p>Waste reduction, waste treatment and increased recycling</p>	<p>Waste management is a serious concern for York, with an increasing population producing more waste and the Government introducing ever higher recycling targets and fines for landfill.</p> <p>The kg of waste collected per head of the population in York is decreasing. The amount of waste sent to landfill is also decreasing alongside an increasing trend for recycling and composting of waste. The proportion of the population served by kerbside collection of one and two renewables also continues to grow. With the increasing population and planned development it will be important that this positive trend is continued and recycling schemes are rolled out across any new development .</p> <p>In dealing with waste in the future, any new proposals for waste sites could also link in with energy generation to help recover energy from waste through the implementation of different treatment methods. This links to the authority's PFI project.</p>	<p>The SA will need to understand the provision for waste treatment over and above that set out in the Core Strategy.</p>

Future trends

11.57 The core strategy has both a policy on Renewable Energy Generation and Waste. The Core Strategy has set the overarching principles of what is expected by developments in terms of provisioning for cleaner and more efficient use of energy. Likewise, the Core Strategy sets out the way in which waste will be dealt with over the planning period. Due to this the provision of renewable energy across developments is anticipated to increase across the city and the amount of landfilled waste will continue to decrease inline with a continued increase in recycling.

11.58 National standards have also been set for the residential and commercial buildings, the Code for Sustainable Homes and BREEAM, require certain standards to be achieved on site with respect to energy generation and waste processing. Development in the future will need to adhere to these standards.

11.59 **Key SA objectives relevant**

- EN6: The prudent and efficient use of energy, water and other natural resources.
- EN7: Reduce pollution and waste generation and increase levels of reuse and recycling.

Appraisal findings

11.60 Under the justification for Statement 8, the SPD recognises that in order to achieve high sustainability standards it will need to “(deal) with waste from the future use of the area through a sustainable waste and resources plan”. This is the only acknowledgement for waste throughout the SPD and whilst the SA welcomes the inclusion of this statement it would recommend that it could be expanded to set out to explain the expectations of this plan. Also, the SA would recommend that the statement within the SPD itself includes for waste generated through the development process to make sure all waste arising from development inception to the future uses on site are captured in planning policy and encouraged to be processed in a sustainable way.

11.61 Principle 4 sets out the main approach to energy use on the British Sugar site in terms of both generation of energy and minimisation of its use. Standards set out in this principle such as Code for Sustainable Homes and BREEAM will both require high standards to be met in order to achieve different levels of sustainable development set out by each standard. Further to this, the justification for Statement 8 sets out aspects which are important to achieve high standards for sustainability on the site:

- Minimising energy consumption in all buildings, including passive solar design.
- Providing, subject to feasibility, sustainable localised low carbon/ renewable energy generation on-site, utilising where possible natural energy sources (at least 10% of the sites energy demand will need to be met by low carbon renewable energy generation, as required in York’s Sustainable Design and Construction Interim Planning Statement).

The SA welcomes the inclusion of these aspects as well as further clarification within the Statements justification that a Low Carbon Energy Generation Strategy should inform the masterplanning and development process. This strategy is to be informed by the emerging citywide Renewable Energy Strategy which suggests a number of schemes that could be suitable on the site, including Combined Heat and Power (CHP) due to the site having a large and stable heat load. A combination of approaches will be necessary to make sure generation of energy from renewable sources to mitigate the impact of the use of fossil fuels brought about through the site’s development and to maximise the potential to achieve SA objective EN6

11.62 The SA also supports the approach to make sure any implemented technologies and approaches are suitable for retrofit in the future to be able to maximise the amount of energy generated. Likewise, the SA welcomes the inclusion of examples to maximise energy efficiency using a number of different techniques such as high standards for insulation and maximising light and heat from the sun. It is anticipated that specifications for this will adhere to the relevant code levels for the building standards applicable on site (CfSH and BREEAM).

11.63 The standards set out for the urban eco-settlement (Statement 9) require higher standards to be met in terms of energy efficiency. The SA would welcome further

explanation of what this would entail over and above the measures set out under Statement 8.

Post Consultation Analysis

How has the SPD changed?	
<ul style="list-style-type: none"> • The first statement of Principle 4 has been amended to read: “New development within the city should contribute towards this with low carbon development and use of renewable energy sources, using a sustainable approach to design and construction to encourage sustainable living”. • Statement 8 (para 6.5) has been amended to read: “Minimising energy consumption in all buildings and adopt Solar Passive Design and in particular site design and layout that favours south facing roof spaces which buildings are likely to have pitched roofs”. Another bullet point has also been amended to read: “All major developments must incorporate on site renewable/low carbon energy generation equipment to reduce predicted carbon emissions by at least 10% as set out in York’s Sustainable Design and Construction Interim Planning Statement.” • The SPD now requires a Local Carbon Framework for York Northwest. • The Delivery and Implementation section requires that: “The provision of renewable energy technologies should be considered at the beginning of the planning process, if appropriate and viable to providers”. 	
What the sustainability implications of the changes made?	
<p>The amendments within the SPD strengthen the requirements for renewable energy use and energy consumption. In particular, the type of systems to be used and amount of renewable energy to be produced has been made more explicit. Furthermore, the Delivery and Implementation section now make it clear that this has to be considered at the beginning of the process. Setting this out is positive in terms of meeting SA objective EN6 (the prudent use of energy, water and other natural resources).</p> <p>There are no additional sustainability comments for waste.</p>	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> • Both the sustainable waste and resources plan and the Low Carbon Energy Generation Strategy are presented at the same time as the masterplanning process to understand how the measures are incorporated throughout the site 	<p>Yes. This is required within the submission documents alongside the planning application.</p>
<ul style="list-style-type: none"> • The SA would welcome further explanation of what standards are required on the urban eco-settlement (statement 9) over and above the measures set out under Statement 8. 	<p>No but the specification for measures in statement 8 has been strengthened.</p>

11.64 Outstanding recommendations and mitigation

None

11.65 Proposed Monitoring

- Implemented energy generation schemes and amount of energy generated.

11.f Soil and Contamination

Introduction

- 11.66 Certain substances are known to be hazardous to people and the environment and the presence of these harmful substances in the ground causes land contamination. Past industrial activities often give rise to land contamination, which mainly derives from waste disposal activities, the storage of chemicals and the production of by-products.
- 11.67 Past activities at the British Sugar site are likely to have given rise to land contamination. The British Sugar site is large and complex but the areas of most concern include the landfill site, fuel tanks, ash pits, ponds, chemical storage areas and railway land. Asbestos is also likely to be present at the site.
- 11.68 **Relevant sustainability issues**
- Making efficient use of land
 - Improving and remediating sites which are known to be contaminated to protect human health, controlled waters and ecological systems.

Baseline data

Issue	Baseline	Considerations for SA analysis
Contamination on the British Sugar Site	<p>Past activities at the British Sugar site are likely to have given rise to land contamination. The British Sugar site is large and complex, but the areas of most concern include the landfill site, fuel tanks, ash pits, ponds, chemical storage areas and railway land. Asbestos and made ground is also likely to be present at the site.</p> <p>A number of ground investigations have taken place at the British Sugar site since 2006, including the York Sugar Factory Site Protection and Monitoring Programme (SPMP) First Phase reporting: Assessment of Reference Data (Aug 2006). This report observed that contamination was found at the site, particularly in the vicinity of the northern waste water treatment plant (NWWTP), the southern waste water treatment plant (SWWTP), the central tank farm and the main factory east. Contaminants of concern include polycyclic aromatic hydrocarbons (PAHs), petroleum hydrocarbons, asbestos, ammoniacal nitrogen and ground gases. It was recognized that the 2006 report was not fully comprehensive in terms of its site coverage and it is likely that future surveys will be required.</p> <p>Remedial work is required to clean up the contamination, which includes hotspots of petroleum hydrocarbons in soil, groundwater contamination and elevated ground gas levels. The site must be cleaned-up to a level suitable for its proposed future use i.e. residential properties with gardens require a higher level of remediation than flats or commercial buildings.</p>	The SA will need to consider how contamination issues will be dealt with through the development process.

Future trends

- 11.69 Certain substances are known to be hazardous to people and the environment and the presence of these harmful substances in the ground causes land contamination. Past

industrial activities often give rise to land contamination, which mainly derives from waste disposal activities, the storage of chemicals and the production of by-products.

- 11.70 Inline with Annex 2 of PPS23 (Development on Land Affected by Contamination) it is the developer's responsibility to ensure that the site is safe and suitable for its proposed future use. The site must be investigated and cleaned-up (remediated) to protect future site users, the environment and property.
- 11.71 Contamination issues on development sites are required to be dealt with prior to any development. Any proposed investigation and remedial works should be submitted and approved by City of York Council prior to commencement of any development.
- 11.72 Contamination at the British Sugar site includes hotspots of petroleum hydrocarbons in soil, groundwater contamination and elevated ground gas levels. Remedial work must be undertaken prior to redevelopment to clean up the contamination. The site must be cleaned-up to a level suitable for its proposed future use i.e. residential properties with gardens require a higher level of remediation than flats or commercial buildings.
- 11.73 **Key SA objectives relevant**
 - EN7: Reduce pollution and waste generation and increase levels of reuse and recycling.
 - EN8: Maintain and improve water quality.
 - S3: Improve the health and well-being of the York population.

Appraisal findings

- 11.74 Contamination is an issue dealt with in the SPD upfront through acknowledging the potential for contamination issues on site given in the vicinity of the landfill site, fuel tanks, ash pits, settlement ponds, storage areas and buildings. Any future development proposals would need to deal with this issue before any development could commence. The remediation scheme should assess the risk to all receptors, including local water courses and groundwater and be submitted to the council for approval prior to development to be agreed.

Post Consultation Analysis

How has the SPD changed?	
<ul style="list-style-type: none"> • The evidence base conducted on site is referenced 	
What the sustainability implications of the changes made?	
Contamination issues were picked up previously in the SA. No further analysis is necessary although the new evidence base will be referenced explicitly.	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> ○ The developer's environmental consultants must conduct an options appraisal to determine the most appropriate remediation techniques. Remedial works may include the excavation of contaminated soils and removal to a suitable licensed landfill site, the importation of clean topsoil for use in residential gardens and areas of soft landscaping, the treatment of contaminated groundwater and the installation of gas protection measures. 	Not yet required

- 11.75 **Proposed recommendations and mitigation**
 - The developer's environmental consultants must conduct an options appraisal to determine the most appropriate remediation techniques. Remedial works may include the excavation of contaminated soils and removal to a suitable licensed landfill site, the importation of clean topsoil for use in residential gardens and areas

of soft landscaping, the treatment of contaminated groundwater and the installation of gas protection measures.

11.76 Proposed Monitoring

- Verification testing of the site following remedial works, to confirm whether the remedial works were successful and whether the site is now suitable for its proposed use.
- Possible requirement for long-term monitoring and maintenance scheme, dependant upon the chosen remediation techniques.

12 Cumulative Impacts

Figure 17: Cumulative impacts of the former British Sugar and Manor School Supplementary Planning Document

Key to the appraisal matrices		Likely effect on the SA Objective																						
++		The option is likely to have a very positive impact																						
+		The option is likely to have a positive impact																						
0		No significant effect / no clear link																						
?		Uncertain or insufficient information on which to determine impact																						
-		The option is likely to have a negative impact																						
--		The option is likely to have a very negative impact																						
I		The option could have a positive or a negative impact depending on how it is implemented																						
Objectives	Headline Objective	EC1	EC2	EC3	EC4	S1	S2	S3	S4	S5	S6	S7	S8	S9	S10	EN1	EN2	EN3	EN4	EN5	EN6	EN7	EN8	EN9
Principle 1	0	+	0	+	I	0	I	+	0	0	0	0	0	++	I	++	0	0	0	0	0	0	0	0
Principle 2	I	+	+	+	++	++	I	+	0	+	++	I	I	0	I	+	?	0	0	0	0	0	0	0
Principle 3	0	++	++	+	+	0	0	0	0	0	+	?	0	0	0	I	I	0	I	0	I	0	0	0
Principle 4	++	0	0	?	0	0	0	I	I	0	?	?	?	+	0	+	I	++	+	++	?	?	0	I?
Principle 5	+	0	0	?	I	?	I	0	I	0	I	I	0	0	0	++	+	?	+	0	0	0	0	0
Principle 6	+	0	0	0	0	++	0	+	+	+	+	++	+	0	+	+	+	I	+	I	0	0	0	0
Principle 7	+	0	0	0	0	++	+	+	I	0	+	I	+	0	0	+	+	I	+	+	I	0	?	+
Principle 8	+	0	0	+	+	+	0	+	+	0	++	++	++	0	+	+	?	?	?	I	I	0	0	I
Principle 9	+	0	0	+	0	+	0	+	+	0	++	++	++	0	+	+	I?	I?	I	+	+	+	0	I
Principle 10	+	0	0	+	I	?	?	+	I	0	?	?	-	0	0	0	?	+	I	+	+	?	?	0

- 12.1 The SEA Directive requires the consideration of cumulative impacts arising from the plan or policies being suggested.

An Environmental Report under the SEA Directive should include:
“the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors”
 (1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects” Annex 1(f)

- 12.2 Cumulative effects are the total effects of multiple actions on a receptor (e.g. the combined impacts of several policies together). It is anticipated that many of the impacts arising from the policies will be cumulative given that some policies will likely impact on another.

The Former British Sugar and Manor School SPD Cumulative Effects

- 12.3 The 10 Spatial Principles and their associated Statements have been assessed against the SA Framework to make an assessment of their social, economic and environmental impacts. This analysis has been used as a basis for examining the cumulative impacts of the policies.
- 12.4 The cumulative impacts of the policies will need to be kept under review through the monitoring process and assessment of planning applications to measure the success of implementing the policies and inform any amendments that may be needed to policies and guidance.

Figure 18: Summary of cumulative impacts on the SA Objectives

SA Objective	Potential Cumulative impacts	Duration of impact:		
		Short term	Medium term	Long term
Headline objective	The Principles will have an overall positive effect on reducing the ecofootprint as they propose to incorporate high quality sustainability principles. Notably, Principle 4 will have the most positive effect. There is also expectations that the overall outcome will be dependent upon implementation in order to judge progress towards meeting the objective.	+	+/l	++/l
EC1	Principle 1, 2 and 3 which apply to this objective will have a positive effect in the short to long-term. Principle 3 is shown to meet this objective directly.	+	+	++
EC2	Applying Principles 2 and 3 is likely to have a positive effect on education and training opportunities in the long-term	?	+	+
EC3	The majority of the principles are shown to have positive effects for conditions of business success. Several of the principles have shown to have uncertain effects and depend upon implementation.	l	l/+	++
EC4	The overall impact on this objective is positive.	+	+	+
S1	The overall impact on this objective is likely to be very positive due to Principle 2, 6 and 7 regarding the provision of social and transport infrastructure.	+	++	++

S2	The impacts on noise are currently unknown and will be determined upon implementation based upon the layout and design of the site. There are likely to be impacts in the short term from the development process.	?/-	?	?
S3	The majority of Principles are likely to effect this object regarding health. The cumulative outcome is likely to be positive in the long term based upon anticipated improvements to the baseline data.	?	+	+
S4	The majority of the principles indicate that the effects on safety and security will depend upon implementation and the masterplanning process due to a current gap in the specific understanding of design and layout of the site.	?/!	?/!	?/!
S5	Decision-making is likely to be positively affected by Principle 2 and 6.	?	+	+
S6	The overall impacts on reducing the need to use the car is positive given that the SPD is promoting sustainable transport, pedestrian and cycle routes as well as limiting car parking spaces. However, the SA notes that Principle 10 regards includes electric cars. Whilst this is in conflict with the objective to reduce car use, it will need to be balanced against the environmental benefits experienced from reduced fossil fuel consumption, lower emissions and potential improvements to other sustainable modes which may mitigate additional electric vehicles being in use. Likewise, principle 3 is likely to encourage more commuting from this area of town to existing employment centres. Alternatives modes to the car need to be in place in order to make sure this objective is achieved. This impact is potentially negative but will depend upon implementation of the sustainable transport network.	+/!	+/!	+/!
S7	The impact on this objective is mixed. Principles 2, 6, 8 and 9 will have a very positive outcome but the impact of some of the other principles is unknown or dependant upon implementation. Overall, the SA considers that further information will be needed at the masterplanning stage to understand the overall impact on this objective.	?/+	?/+	?/+
S8	The SA identifies that the approach taken by the SPD is positive for this objective, particularly for Principles 8 and 9. It also identifies that there is a potential conflict with Principle 10 to reduce car use as it promotes electric vehicles. This will need to be balanced against the environmental benefits experienced from reduced fossil fuel consumption, lower emissions and potential improvements to other sustainable modes which may mitigate additional electric vehicles being in use.	+	+	+
S9	The impacts on this objective will be very positive as it will be directly meeting housing demand and social needs.	++	++	++
S10	The impacts on this SPD are positive but also depend upon implementation as further details were identified to be needed to fully understand further impacts.	!/+	!/+	!/+
EN1	The overall impact of the SPD on this objective is positive.	++	++	++

EN2	Analysis has revealed that the overall impact of the development on the Heritage and cultural objectives is unknown or depends upon implementation. Further analysis is needed during the masterplanning planning process and alongside the development of the design code in order to take this analysis further.	?	?	?
EN3	This impact on biodiversity is likely to depend upon implementation of the green network, the specific approach of which is currently unknown. Also, Principle 8 and 9 both have identified conflicts with biodiversity given that transport can have a negative effect on wildlife. The full extent of the potential impact will need to be monitored alongside the masterplanning process.	?	?	?
EN4	Overall, the impact on minimising greenhouse gas emissions and the approach to climate change is positive given the in combination effects of planning a highly sustainable development. It is acknowledged that the full extent of the impacts will need to be monitored in the future and alongside the masterplanning to fully understand how this site affects and adapts to climate change in the future.	?	+	+
EN5	The majority of the Principles aim to support this objective to improve air quality. Principle 4, Principle 7 and Principle 9 have been assessed as particularly positive for the objective.	?	+/I	+/I
EN6	The effect on energy and resources is currently unpredictable as it will depend upon implementation of different technologies on site which are yet to be specified through the planning process. It is anticipated that the implementation of Principle 4 will be the direct influence on the overall achievability of this objective.	I	I	+/I
EN7	The influence of the SPD on this SA objective is likely to be positive as it advocates sustainable techniques to be implemented. This will also be determined upon implementation as the SPD specifies a waste strategy will need to be outlined separately and contamination issues dealt with prior to development of the site.	?	?	?
EN8	The analysis has shown that there are no clear links between the SPD and its link to water quality apart from an uncertain impact from Principle 7. This is due to the impacts of the development on incorporating the river as part of the GI network and recreational purposes.	O	O	O/?
EN9	The overall impact of the SPD on flooding will be determined through implementation. It is anticipated that flood mitigation measures will limit the impact on site although it will depend upon the design, construction and layout the development. In the long-term, measures to address climate change should help to limit the effect on flooding.	I	I	I

13 Monitoring

13.1 As part of the Planning and Compulsory Purchase Act 2004, local planning authorities must prepare an Annual Monitoring Report setting out, amongst other things, the extent to which the policies set out in the DPDs and SPDs are being achieved. In addition this the SEA Directive, the significant environmental effects of the plan or programme in question must be monitored. The SEA regulations also require that the measures taken to monitor significant environmental effects are outlined in the statement prepared following adoption.

The Environmental Report' required under the SEA Directive should include:
 “ a description of the measures envisaged concerning monitoring in accordance with Article 10” (Annex 1(i))

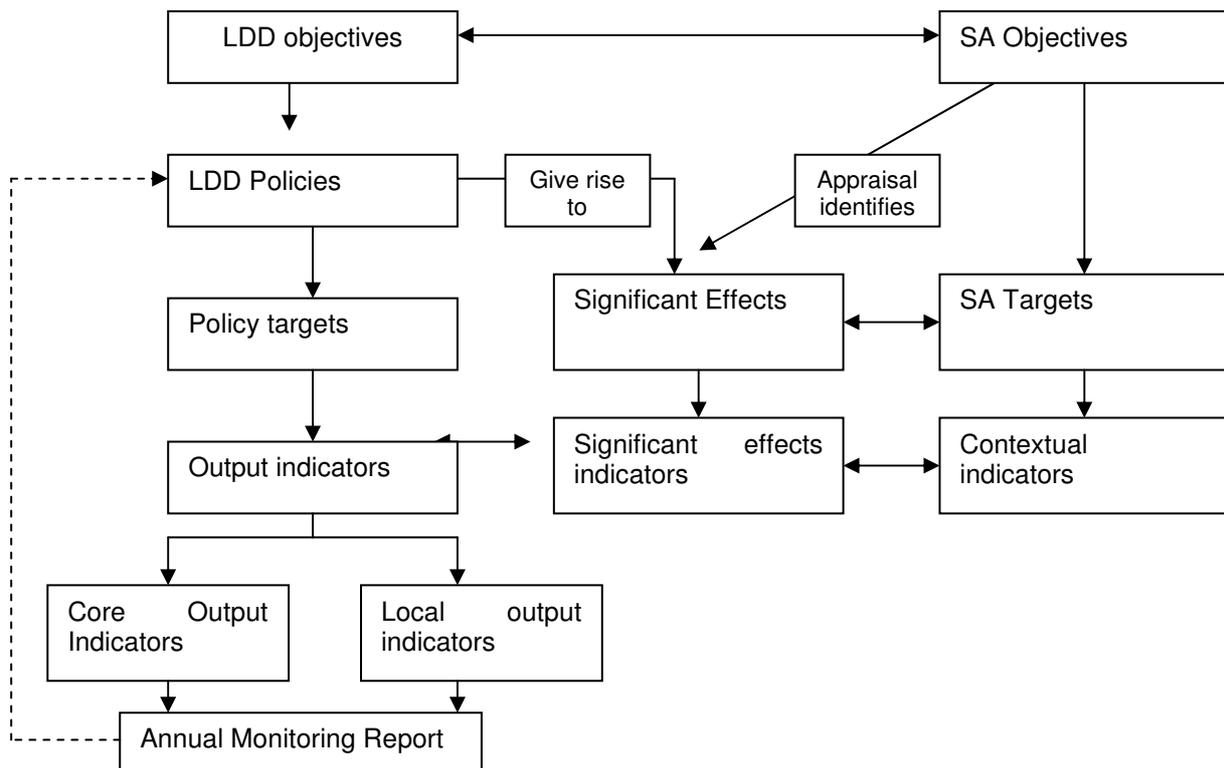
“Member States shall monitor the significant environmental effects of the implementation of plans and programmes...” (Article 10(1))

13.2 The Government have produced a “Local Development Framework Monitoring: A good Practice Guide”. This proposes three types of indicators for monitoring the LDF:

- Contextual indicators – for monitoring the wider background against which the plan operates
- Output indicators – for monitoring plan policies
- Significant effects indicators – for monitoring important effects identified by the SA

13.3 The significant effects indicators that have been identified by the SA process are set out within Annex 1 and relate to the objectives in the SA framework. The majority of these indicators overlap with those set out by the AMR and identified for monitoring by the Core Strategy. It is anticipated that the effects and indicators to monitor the Former British Sugar and Manor School SPD will therefore be monitored as part of the AMR process, which monitors performance of the development plans.

Figure 19: Local Development Framework Monitoring



14 What Happens Next?

- 14.1 Following the consultation period of the Core Strategy Preferred Options document and this accompanying Sustainability Appraisal, Officers will assess the comments received and revise the Core Strategy to produce a final version. The final version of the Core Strategy will then be subject to further Sustainability Appraisal Analysis and a report produced to document the findings and detailing the SA process throughout the preparation of the Core Strategy. The final version of the Core Strategy and SA reports will then be subject to public consultation ahead of it being submitted to the Secretary of State. Following this, it will be assessed at an Examination in Public before being adopted by the Council.

How to comment on this report

- 14.2 The Council welcomes feedback on the issues and analyses on the Former British Sugar and Manor School SPD set out by the Sustainability Appraisal. The consultation on the this document runs until **26th January 2011**.
- 14.3 There are 2 ways to comment on this report:
1. Use our online consultation finder for free on the City of York Website
<http://www.york.gov.uk/consultation/>
 2. Download a consultation response form from the City of York Website and submit it to:
City of York Council
City Strategy
City Development Team
York
YO1 7ET

Fax: 01904 551392
Email: citydevelopment@york.gov.uk

Further Information

- 14.4 If you would like further information regarding the Sustainability Appraisal process please contact Alison Cooke in the City Development: Research and Information team using the details below:
- Telephone: 01904 551467
Email: alisonsarah.cooke@york.gov.uk

Annex 1: Glossary

Affordable Housing: Residential accommodation that is provided with a subsidy to ensure that rents/prices remain at a level that is genuinely affordable to local people whose income means that they are unable to meet their housing needs through the housing market

Air Quality: The Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets maximum objectives (targets) for the following pollutants: Benzene, 1-3 Butadiene, Carbon Monoxide, Lead, Nitrogen dioxide, Particles (PM10), Sulphur dioxide and Polycyclic aromatic hydrocarbons. These pollutants, which largely result from traffic and industrial processes, are monitored and the identified levels are used to measure air quality.

Allocated site: Site identified in the Plan for a specific use.

Annual Monitoring Report (AMR): part of the *Local Development Framework*, the annual monitoring report will assess the implementation of the Local Development Scheme and the extent to which policies in *Local Development Documents* are being successfully implemented.

AONB : Areas of Outstanding Natural Beauty

Aquifer: Rock, which provides a natural underground store for water.

Archaeological Sites: Evidence of the past development of our civilisation, including places of worship, defence installations, burial grounds, farms and fields, housing and sites of manufacture.

Area Action Plan: used to provide a planning framework for areas of change and areas of conservation. Area Action Plans will have the status of *Development Plan Documents*.

Biodiversity - the different plants, animals and micro-organisms, their genes and the ecosystems of which they are a part.

Biodiversity Action Plan (BAP): A plan prepared by the Council and nature conservation organisations to reverse the decline in the variety of species of animals and plants.

Biomass: is the shared description for the controlled release and use of the energy potential locked up in **trees and plants** – straw, reeds or willow - or created as a part of regularly recurring natural processes – the bi-products of the process of decomposition or the bacterial **digestion** of natural things i.e. sewerage, various farm wastes or decaying material such as garden clippings and/or other largely natural materials such as paper.

Birds Directive: Council Directive 79/409/EEC on Conservation of wild birds, commonly referred to as the Birds Directive.

Brownfield land or site: Brownfield land is another term for previously developed land, or land that contains or contained a permanent structure and associated infrastructure.

Carbon Emissions - Emissions to the atmosphere principally from the burning of fossil fuels and deforestation.

Cofiring - Cofiring is a near term, low-cost option for efficiently and cleanly converting biomass to electricity by adding biomass as a partial substitute fuel in high-efficiency coal boilers.

Community Strategy: the plan which local governments are required to prepare through community partnerships.

Contaminated Land: Statutorily defined as ‘any land which appears to the local authority in whose area it is situated to be in such a condition by reason of substances in, on or under the land that – a) significant harm is being caused or there is a significant possibility of such harm being caused; or b) pollution of controlled waters is being or is likely to be caused’.

Core Strategy: set out the long-term spatial vision for the local planning authority area, the spatial objectives and strategic policies to deliver that vision. The Core Strategy will have the status of a *Development Plan Document*.

Development Plan: as set out in Section 38(6) of the Act, an authority’s development Plan consists of the relevant *Regional Spatial Strategy* (or the Spatial Development Strategy in London) and the *Development Plan Documents* contained within its *Local Development Framework*.

Development Plan Documents (DPDs): spatial planning documents that are subject to independent examination, and together with the relevant Regional Spatial Strategy, will form the *development plan* for a local authority area for the purpose of the Act. They can include a *Core Strategy*, Site Specific Allocations of land, and *Area Action Plans* (where needed). Other Development Plan Documents, including generic Development Control Policies, can be produced. Individual Development Plan Documents or part of a document can be reviewed independently from other Development Plan Documents. Each authority must set out the programme for preparing its *Development Plan Documents* in the *Local Development Scheme*.

Development Control Policies: these will be a suite of criteria-based policies which are required to ensure that all development within the areas meets the spatial vision and spatial objectives set out in the *Core Strategy*. They may be included in any *Development Plan Document* or may form a standalone document, such as a Development Control DPD.

Ecological Footprint (Ecofootprint): a measure of the land area (in global hectares or gha) that is required to sustain human activity, including through food production and transport, provision of resources, energy generation, waste assimilation and greenhouse gas generation. Calculating an ecofootprint helps to explore and understand our impact on the environment and the planet, and to identify ways to reduce it.

Environmental Impact Assessment (EIA): a systematic procedure to determine the likely significant effects of a proposed development project on the environment. The EIA is prepared by and is the responsibility of the applicant and the resulting documentation is termed an ‘Environmental Statement’. The EIA aims to ensure the likely environmental effects of proposed developments are highlighted at an early stage in the process to assist the decision-making authority in determining planning permission.

Greenhouse Gases (GHG) – a group of gases that absorb solar radiation, storing some of the heat in the atmosphere. The major natural greenhouse gases are water vapor, carbon dioxide, and ozone. Other greenhouse gases include, but are not limited to: methane, nitrous oxide, sulfur hexafluoride, and chlorofluorocarbons.

Historic Environment: refers to the historic buildings, streetscapes, landscapes and parks which together form an important aspect of the character and appearance of York.

Ground source heat pumps (GSHP)- transfer heat from the ground into a building to provide space heating and, in some cases, to pre-heat domestic hot water. They rely on the absorption of the heat produced by the sun being drawn into a compression unit with an evaporator coil heat

exchanger which works like a fridge in reverse; making it possible to produce heat from external air temperatures of as little as -15°C , or constant UK ground (12°C), or water temperatures.

Habitats Directive: Council Directive 92/43/EEC 21st May 1992 on the Conservation of natural habitats and wild fauna and flora.

Habitats Regulations Assessment: The Habitats Regulations Assessment is required under the European Directive 92/43/EEC on the Conservation of natural habitats and wild fauna and flora' for plans that may have an impact on sites designated at a European level for nature conservation.

Hydroelectric power - Hydroelectric power is electricity produced from the energy of falling water. The basic theory of hydroelectricity is to harness the potential energy within falling water. The potential energy is harnessed with the same principles used by a water wheel, the force of gravity makes the water fall making the wheel turn.

Issues and Options: produced during the early production stage of the preparation of *Development Plan Documents* and may be issued for consultation.

Local Development Document (LDDs): the collective term in the Act for *Development Plan Documents*, *Supplementary Planning Documents* and the *Statement of Community Involvement*.

Local Development Framework (LDFs): the name for the portfolio of *Local Development Documents*. It consists of *Development Plan Documents*, *Supplementary Planning documents*, a *Statement of Community Involvement*, the *Local Development Scheme* and *Annual Monitoring Reports*. Together these documents will provide the framework for delivering the spatial planning strategy for a local authority area and may also include local development orders and simplified planning zones.

Local Development Scheme (LDS): sets out the programme for preparing *Local Development Documents*. All authorities must submit a Scheme to the Secretary of State for approval within six months of the commencement of the Act.

Local Nature Reserves (LNRs):

All LNRs are owned or controlled by local authorities and some, but not all, are SSSIs. Local authorities consult English Nature on all new proposals for LNRs in England.

Local Plan: A document which, together with the *Structure Plan*, forms part of the *Development Plan* for a specified area. The Local Plan consists of a written statement and a proposals map. It sets out detailed policies and proposals for the development and use of the land within the District. Local Plans are prepared by local planning authorities at District level, following statutory procedures, including public consultation exercises and if necessary, a Local Plan Inquiry. The Planning and Compensation Act 1991, requires that new plans provide district wide coverage.

Local Strategic Partnership: an over arching partnership of key stakeholders responsible for producing the Community Strategy for the city.

Local Transport Plan (LTP): 5-year strategy prepared by each local authority for the development of local, integrated transport, supported by a programme of transport improvements. It is used as a bid to Government for funding transport improvements.

Mitigation measures: Actions to prevent, avoid or minimise the actual or potential adverse effects of a development, action, project, plan, policy etc.

Natura 2000: A European Union wide network of nature protection areas established under the 1992 Habitats Directive. It is comprised of Special Areas of Conservation (SAC) designated by Member States under the Habitats Directive and also Special Protection Areas (SPAs) designated under the 1979 Birds Directive. These sites are part of a range of measures aimed at conserving important or threatened habitats and species.

Offshore wind – wind turbines situated a distance from the shore

Onshore – wind turbines situated near or in the sea

Photovoltaic – solar cells which directly convert sunlight into electricity, are made of semi conducting materials.

Preferred Options: A report on the Council's Preferred Options will offer alternative proposals and policy options for consultation over 6 weeks, however the Council will highlight those options which it feels is most appropriate and why alternatives discarded.

Proposals Map: the adopted proposals map illustrates on a base map, (reproduced from, or based upon a map to a registered scale) all the policies contained in the *Development Plan Documents*, together with any saved policies. It must be revised each time each new *Development Plan Documents* is adopted, and it should always reflect the up-to-date planning strategy for the area. Proposals for changes to the adopted proposals map accompany submitted *development plan documents* in the form of a submission proposals map.

RAMSAR: The UK Government signed the Convention on Wetlands of International Importance Especially as Waterfowl Habitat (the Ramsar convention) in 1973. Under the Convention the Government is committed to designate 'Wetlands of International Importance' (Ramsar sites) and to use the wetlands within its territory wisely.

Regional Spatial Strategy (RSS): sets out the region's policies in relation to the development and use of land and forms part of the development plan for local planning authorities. Planning Policy Statement 11 'Regional Spatial Strategies' provides detailed guidance on the function and preparation of Regional Spatial Strategies.

Renewable Energy: Term used to describe energy that occurs naturally and repeatedly in the environment – e.g. energy from the sun, wind, water, land, plant material. Combustible or digestible waste materials are also regarded as renewable sources of energy.

SEA Directive: European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

Site Allocations: allocation of development sites for specific or mixed uses or development to be contained in a DPD. Policies will identify any specific requirements for individual proposals.

Solar Water Heating (SWH) - is a system for heating water using energy from the sun. Solar energy is collected by a panel, which is connected by pipes to a hot water storage device such as a hot water cylinder.

Special Area of Conservation (SAC): SACs are areas which have been given special protection under the European Union's Habitats Directive. They provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world's biodiversity.

Special Protection Areas (SPA): The Government is bound by the European Communities Council Directive of April 1979 on the Conservation of Wild Birds. Under this directive the

Government has to designate Special Protection Areas to conserve the habitat of certain rare or vulnerable birds (listed under the directive) and regularly occurring migratory birds. It has to avoid any significant pollution or disturbance to or deterioration of these designated sites.

Sites of Special Scientific Interest (SSSIs):

Sites of Special Scientific Interest are notified by English Nature because of their plants, animals, or geological or physiographical features. Most SSSIs are privately owned or managed. About 40% are owned or managed by public bodies such as the Forestry Commission, Ministry of Defence and The Crown Estate, or by the voluntary conservation movement.

Statement of Community Involvement (SCI): sets out the standards which authorities will achieve with regard to involving local communities in the preparation of local development documents and development control decisions. The Statement of Community Involvement is not a *development plan document* but is subject to an independent examination.

Strategic Environmental Assessment (SEA): a generic term used to describe environmental assessment as applied to policies, plans and programmes. The European 'SEA Directive' (2001/42/EC) requires a formal 'environmental assessment of certain plans and programmes, including those in the field of planning and land use'.

Strategic Flood Risk Assessment: is a planning tool, which is used to assess flood risk within an area. It is designed to inform the spatial planning process of relevant issues of flood risk.

Sustainability Appraisal (SA): tool for appraising policies to ensure they reflect sustainable development objectives (i.e. social, environmental and economic factors) and required in the Act to be undertaken for all local development documents.

Sustainable Development: environmentally responsible development, commonly defined as 'development, which meets the needs of the present generation without compromising the ability of future generations to meet their own needs'.

Sustainable energy - Energy which is replenishable within a human lifetime and causes no long-term damage to the environment or future generations.

Supplementary Planning Documents (SPDs): provide supplementary information in respect of the policies in the Development Plan Documents. They do not form part of the Development Plan and are not subject to independent examination.

Wind turbines – convert power in the wind into electrical energy using rotating wing-like blades which drive a generator.

Annex 2: Full SA Analysis Matrices

Theme 1: Sustainable, interactive and inclusive communities

York Northwest SPD Principle 1: To create a sustainable, balanced community through the provision of an appropriate range of housing.				
<ul style="list-style-type: none"> ○ Statement 1: Affordable housing will be negotiated against current council targets for brownfield site, and on-site developer provision secured through Section 106 Agreement ○ Statement 2: Housing size and type will contribute to achieving a balanced housing market through meeting the needs of an identified cross section of the community, This will be achieved through taking into account the SHMA's findings in the context of the sites location and anticipated future needs. ○ Statement 3: Housing density will make best use of brownfield land and help to deliver key place making objectives. 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	General comments			Statements 2 and 3 regarding the provision of housing types and site density at the development are intrinsically linked and may benefit from becoming one statement.
	Headline objective: Reduction of York's Ecological Footprint	O	N/a	There is no clear link between this principle and the objective
EC1	Good quality employment opportunities for all	+	ST	The development of housing will provide jobs associated with the construction industry in the short term. In the longer term the potential incorporation of small-scale employment development (such as live/work units) could generate jobs for residents living in the development.
EC2	Good education and training opportunities for all which build the skills of the population	O	N/a	There is no clear link between this principle and the objective
EC3	Conditions for business success, stable economic growth and investment	+	LT	Provision of housing will be positive in supporting the needs of the work force in York. Supporting the needs of the workforce is paramount in helping to create conditions for business success.
EC4	Local food, health care, education / training needs and employment opportunities met locally.	+/I	N/a	In the longer term the potential incorporation of small-scale employment development (such as live/work units) could generate jobs for residents living in the development.

S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	O	N/a	There is no clear link between this principle and the objective.
S2	Maintain or reduce York's existing noise levels	I	LT	The redevelopment of the site for housing may have a positive impact as less noise may be made than the previous industrial use. Noise, if created, is likely to be of a different cause, i.e. vehicle travel.
S3	Improve the health and well being of the York population	+	LT	The development of housing will provide a range of accommodation on site, which will help meet the needs of different groups and household types. There is a particular emphasis in the accompanying text on family housing in this area, of which there is a shortage across the city. Provision would therefore be positive for maintaining well-being as the site will try and align its provision to the different social needs in York.
S4	Safety and security for people and property	O	N/a	There is no clear link between this principle and the objective.
S5	Vibrant communities that participate in decision-making	O	N/a	There is no clear link between this principle and the objective
S6	Reduce the need to travel by private car	O	N/a	There is no clear link between this principle and the objective
S7	Development which provide good access to and encourage use of public transport, walking and cycling	O	N/a	There is no clear link between this principle and the objective
S8	A transport network that integrates all modes for effective non-car based movements	O	N/a	There is no clear link between this principle and the objective
S9	Quality affordable housing available for all	++	LT	This principle directly meets the objective through the promised provision of a mix of housing size and type across the site. In addition, the site will also support housing for a wider needs of specific communities, such as the elderly and those with disability needs. The general approach to the site is with an emphasis on family housing as the majority of the provision and only a small proportion of flatted development. This is in alignment with the overall need within the city and aims to address issues set out in the baseline and evidence base with regards to housing needs within York.

S10	Social inclusion and equity across all sectors	I	ST / LT	The principle does not state how the affordable housing provision will be distributed. A steer on this would be welcomed to make sure future developers spread out affordable homes to aid social integration.
EN1	Land use efficiency that maximises the use of brownfield land	++	LT	The overall development of this site meets this objective. Statement 3 also aims to make the best use of brownfield land directly through the provision of housing on site. However, the SA is unsure if low density levels may impact on the provision of housing which may conflict with the delivery of family housing.
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	O	N/a	There is no clear link between this principle and the objective. Design issues with regard to housing are addressed through other statements within the SPD.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	O	N/a	There is no clear link between this principle and the objective though biodiversity features can be incorporated into any building depending on its height and structure.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	O	N/a	Buildings are a main source of Co2 emissions which can be mitigated through sustainable design and construction techniques. The development of this site for mainly housing will mean that this issue needs to be minimised before being developed and linked to urban design principles to be adhered to within the development.
EN5	Improve air quality in York	O	N/a	There is no clear link between this principle and the objective
EN6	The prudent and efficient use of energy, water and other natural resources	O	N/a	There is no clear link between this principle and the objective
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	O	N/a	There is no clear link between this principle and the objective. The SA would however, like it be clear the expectation of processing the contaminated waste present on site.
EN8	Maintain and improve water quality	O	N/a	There is no clear link between this principle and the objective
EN9	Reduce the impact of flooding to people and property in York.	O	N/a	There is no clear link between this principle and the objective
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ Statement 2 should reference an “emphasis on family housing” like elsewhere in the document. ○ Statement 3 references “place-making objectives” but these are not defined. The reference is too generic and should be made specific in order to fully understand what objectives are to be met through this statement. ○ Although the Principle and associated statements deal with provision of housing, the SA would welcome a steer from the explanation about directing the level of affordable and other specialist homes to make sure they are integrated fully within the development to aid social inclusion. 				

York Northwest SPD Principle 2: To ensure that social infrastructure requirements of the new community are met through provision of facilities and services in a planned, phased manner which compliments and integrates with existing facilities.				
<ul style="list-style-type: none"> ○ Statement 4: New social infrastructure should be provided at a local scale and in a timely manner to meet the needs of the new community. ○ Statement 5: An accessible new local centre will be provided within the Site and would e served by sustainable transport and integrated with green infrastructure 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	Headline objective: Reduction of York's Ecological Footprint	I/+	LT	The positive impact of providing social infrastructure within close proximity to a residential population is that it encourages sustainable travel, particularly walking and cycling. In turn, this is likely to help reduce vehicle emissions and energy use on site, which is positive for lowering the ecofootprint in this location.
EC1	Good quality employment opportunities for all	I	ST	It is anticipated that a small number of jobs would be created to work within the services and facilities provided for running and maintenance reasons. Also, in the short-term, the development of the site would employ construction industry workers.
EC2	Good education and training opportunities for all which build the skills of the population	+	LT	Statements 4 and 6 aim to provide a quantity of educational facilities on site in line with the anticipated population and need. New provision will be necessary to not over populate current schools which may be within a short distance. Statement 6 insinuates that some facilities, such as a secondary school, may not be on site. The rationale behind this is that existing schools may be able to expand in order to cater for the projected level of new pupils, although considerations with regards to openspace and catchment area would need to be looked at in more detail. In addition to this, the provision of new community facilities would also provide space where people could learn and develop skills or where training events could be hosted.
EC3	Conditions for business success, stable economic growth and investment	+	LT	Social infrastructure is an important requirement in order for a community to function sustainably and happily. The development of this therefore alongside new homes will all feed into creating a place which supports the economy with workers but also would be attractive for investment.

EC4	Local food, health care, education / training needs and employment opportunities met locally.	++	LT +	This principle directly meets this objective. It should make sure that the requirement for facilities and services within the development site incorporates adequate provision for food, healthcare, built sports, built community facilities and education.
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	++	LT +	Statement 4 aims for the site to provide a range of services, including built sports and leisure facilities as well as community facilities such as halls etc. In addition to this, statement 5 aims to ensure that these facilities will be accessible by sustainable transport and integrated green infrastructure networks. Not only will new facilities in this area be provided for the new resident population but people living outside of this area should benefit from the increase in available facilities.
S2	Maintain or reduce York's existing noise levels	I	LT ?	The noise implications from the uses set out by this principle may arise from some of the uses and vehicle movements. However, master-planning of the site should consider how to minimise noise across the site when the local centre is developed.
S3	Improve the health and well being of the York population	+	LT +	Social infrastructure is an important part of any community which wishes to remain healthy and happy. The justification for Statement 4 sets out that healthcare facilities will potentially be provided on site. This needs to be ensured in order for residents at the British Sugar site to be have local access to healthcare of an adequate scale and distance. Other services outlined should also provide activities and places to meet which will aid overall well-being.
S4	Safety and security for people and property	O	N/a	There is no clear link between this principle and the objective.
S5	Vibrant communities that participate in decision-making	+		The provision of community facilities will help to increase the formulation of a vibrant community who, hopefully, will engage within the community. Developing halls, educational facilities, built sports and other meeting spaces should help to encourage the new population to participate in decision-making for the local area.
S6	Reduce the need to travel by private car	++	LT	The positive impact of providing social infrastructure within close proximity to a residential population is that it encourages sustainable travel, particularly walking and cycling. This should be positive in helping to reduce the numbers of people travelling, at least short distances, by car from this location.

S7	Development which provide good access to and encourage use of public transport, walking and cycling	+/I		The close proximity of the anticipated facilities should encourage people to particularly walk or cycle to the new local centre. Statement 5 particularly supports this approach and encourages that sustainable transport and green infrastructure should serve the local centre to support this type of access. The extent to which this will be successful will depend upon the layout and site design.
S8	A transport network that integrates all modes for effective non-car based movements	+/I		Statement 5 aims to link in sustainable transport routes and the GI network to the local centre which should encourage non car based travel across the site to use these facilities. The extent to which this will be successful will depend upon the layout and site design.
S9	Quality affordable housing available for all	O		There is no clear link between this principle and the objective.
S10	Social inclusion and equity across all sectors	I		The provision of community facilities will help to bring the community together to undertake activities and events. This should aid social inclusion within this area.
EN1	Land use efficiency that maximises the use of brownfield land	+	LT +	The SA considers that the development of social infrastructure on this site is important for the associated residential development. Given this, it is considered an appropriate use on this site and will make good use of the brownfield location.
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	?		The provision of social infrastructure should help to integrate the site into the city. The success of this will depend upon implementation and design of the site overall.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	O	N/a	There is no clear link between this principle and the objective
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	+		Locating development within close proximity to services should help to minimise vehicle movements. This will have a direct effect on minimising the amount for greenhouse gases emitted on site.
EN5	Improve air quality in York	O	N/a	There is no clear link between this principle and the objective
EN6	The prudent and efficient use of energy, water and other natural resources	O	N/a	There is no clear link between this principle and the objective
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	O	N/a	There is no clear link between this principle and the objective
EN8	Maintain and improve water quality	O	N/a	There is no clear link between this principle and the objective

EN9	Reduce the impact of flooding to people and property in York.	O	N/a	There is no clear link between this principle and the objective
Recommendations:				
○ none				

York Northwest SPD Principle 3: To maximise the benefits of sustainable economic growth for the local community				
<ul style="list-style-type: none"> ○ Statement 7: To promote opportunities for small scale B1 employment uses in association with the local centre or in a live/work format in order to reduce the need to travel ○ Statement 8: A programme of training and skills development will be expected to accompany detailed planning applications in order to facilitate training opportunities and provide educational opportunities with particular emphasis on new sustainable technologies 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	Headline objective: Reduction of York's Ecological Footprint	O	N/a	Providing some degree of sustainable mixed use within the development could reduce the need to travel, thereby having a beneficial effect on York's ecological footprint.
EC1	Good quality employment opportunities for all	++	ST / I	This principle and its associated statement would help to achieve this objective through the provision of employment opportunities on site. Although this would be small scale, it may counteract some of the lost jobs from the closing of the sugar beet factory. The skills needed to undertake the jobs may be different to those previously needed however, which would involve an element of training. This would be supported, particularly throughout the development of the site by statement 8. Construction and associated skills, including sustainable technologies, linked to the development would be particularly appropriate although this may be short term for the duration of the development. However, it is not guaranteed that the jobs on site would be taken not be taken by non-resident construction workers.
EC2	Good education and training opportunities for all which build the skills of the population	++	St /LT +	Statement 8 directly meets this objective through a training and skills programme after the developments completion. However, it is considered that this should also specify that the potential for training opportunities should be maximised as the development is taking place as this would be beneficial for skills development in the short-term.

EC3	Conditions for business success, stable economic growth and investment	+	LT	This principle and the associated statements should help to support this objective through the provision of jobs and the programme of skills training.
EC4	Local food, health care, education / training needs and employment opportunities met locally.	+	LT +	Statement 8 directly meets this objective through a training and skills programme after the developments completion. However, it is considered that this should also specify that the potential for training opportunities should be maximised as the development is taking place as this would be beneficial for skills development in the short-term.
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	O	N/a	There is no clear link between this principle and the objective.
S2	Maintain or reduce York's existing noise levels	O	N/a	There is no clear link between this principle and the objective.
S3	Improve the health and well being of the York population	O	N/a	There is no clear link between this principle and the objective.
S4	Safety and security for people and property	O	N/a	There is no clear link between this principle and the objective.
S5	Vibrant communities that participate in decision-making	O	N/a	There is no clear link between this principle and the objective.
S6	Reduce the need to travel by private car	+/-	?	Locating jobs within close proximity to residential should have a positive effect in minimising commuting. However, the number of jobs anticipated is small but would help to reduce the need to travel by car for those who did work and live in close proximity. However, the majority of British Sugar residents will travel to existing centres to access employment. This may lead to an increase in traffic due to the number of residents.
S7	Development which provide good access to and encourage use of public transport, walking and cycling	?		Whilst this principle and its associated statements do not clearly meet the objective, it will be important in the masterplanning stages of the development to give regard to how transport networks interlink with any employment opportunities.
S8	A transport network that integrates all modes for effective non-car based movements	O	N/a	There is no clear link between this principle and the objective.
S9	Quality affordable housing available for all	O	N/a	There is no clear link between this principle and the objective.
S10	Social inclusion and equity across all sectors	O	N/a	There is no clear link between this principle and the objective.

Sustainability Appraisal of the British Sugar SPD

EN1	Land use efficiency that maximises the use of brownfield land	I	N/a	The provision of B1a office as part of the local centre through Statement 7 would maximise the use of the brownfield land if it was provided in scale to the development, possible as part of the upper floors of the local centre. This will be determined through the masterplanning process.
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	I	N/a	Any development would need to adhere to strong design principles and be in keeping and scale to the surroundings and the setting of York.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	O	N/a	There is no clear link between this principle and the objective.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	I	N/a	Locating training and small businesses alongside a local centre and in the vicinity of residential development may help to cut vehicular trips which would be positive for reducing greenhouse gas emissions. The offer however, is likely to be small and therefore may have only a small impact overall. This will depend upon implementation.
EN5	Improve air quality in York	O	N/a	There is no clear link between this principle and the objective.
EN6	The prudent and efficient use of energy, water and other natural resources	I	N/a	The training opportunities outlined by statement 8 are for sustainable technologies which may help to support the development of this objective throughout the city.
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	O	N/a	There is no clear link between this principle and the objective.
EN8	Maintain and improve water quality	O	N/a	There is no clear link between this principle and the objective.
EN9	Reduce the impact of flooding to people and property in York.	O	N/a	There is no clear link between this principle and the objective.
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ Live-work units could be provided and acceptable on site. ○ The small business uses could be located on upper floors of the local centre to maintain vibrancy and maximum use of space. 				

York Northwest SPD Principle 4: To ensure the highest achievable standards of sustainability are embedded at all stages of the development				
<ul style="list-style-type: none"> ○ Statement 9: To ensure that the design, construction and occupation of the development minimises environmental impact over its lifetime ○ Statement 10: Subject to the availability of the Urban Eco-settlement funding those aspects of the development to which funding is directed will be expected to be delivered to an agreed higher environmental specification, guided by eco town principles and site characteristics, and enabled through the general approach to masterplanning the whole site. 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	General comments			Principle 4 is an overarching theme for the whole SPD. It would be useful to have this concept up front as a preliminary principle to make sure the highest standards are achieved on site.
	Headline objective: Reduction of York's Ecological Footprint	++	LT +	This principle will directly meet this objective should it be implemented effectively. This principle should help to minimise the impact of development of this site on the overall ecological footprint of York particularly statement 9.
EC1	Good quality employment opportunities for all	○	N/a	There is no clear link between this principle and the objective
EC2	Good education and training opportunities for all which build the skills of the population	○	N/a	There is no clear link between this principle and the objective
EC3	Conditions for business success, stable economic growth and investment	?	N/a	The approach to the design of the site in terms design and uses should enhance the attractiveness of the area and may attract investment to the overall York Northwest area.
EC4	Local food, health care, education / training needs and employment opportunities met locally.	○	N/a	There is no clear link between this principle and the objective. However, if the development uses local construction materials this would link this objective to statement 8 regarding skills.
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	○	N/a	There is no clear link between this principle and the objective
S2	Maintain or reduce York's existing noise levels	○	N/a	There is no clear link between this principle and the objective
S3	Improve the health and well being of the York population	I	N/a	A well designed development using sustainable principles should create a high quality environment which will aid health and well-being of the population in the area.

S4	Safety and security for people and property	I	N/a	The overall design of the site should take this into consideration.
S5	Vibrant communities that participate in decision-making	O	N/a	There is no clear link between this principle and the objective
S6	Reduce the need to travel by private car	?	N/a	There is no link between the statements set out in this principle to the sustainable transport principles. It is considered that this linkage should be addressed as it will be an important element of the design, construction and occupation of the site.
S7	Development which provide good access to and encourage use of public transport, walking and cycling	?	N/a	There is no link between the statements set out in this principle to the sustainable transport principles. It is considered that this linkage should be addressed as it will be an important element of the design, construction and occupation of the site.
S8	A transport network that integrates all modes for effective non-car based movements	?	N/a	There is no direct link between the statements set out in this principle to the sustainable transport principles. It is considered that this linkage should be addressed as it will be an important element of the design, construction and occupation of the site.
S9	Quality affordable housing available for all	O	N/a	There is no clear link between this principle and the objective
S10	Social inclusion and equity across all sectors	O	N/a	There is no clear link between this principle and the objective
EN1	Land use efficiency that maximises the use of brownfield land	O	N/a	There is no clear link between this principle and the objective
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	?	LT	In the long-term, creating a sustainable development will help to preserve the quality of the built environment in York. This is subject to wider principles set for the site in terms of heritage assets and setting, including the setting of York as an internationally significant place. It also includes issues connected with the city's massing and density as well as its landscape design. Any techniques which are applied in order to minimise the environmental impact should take consideration therefore of the wider heritage issues within the city as a whole.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	I/+	N/a	Whilst this principle does not directly link to this objective there should be link made to the value of incorporating natural environments / biodiversity in a development to minimise environmental impacts. For example, trees help to offset carbon emissions and minimise urban heat effects and also act as successful measures for adapting to a changing climate. This development will need to consider predicted changes in climate and how these changes can be mitigated via adaptation

				measures such as trees for shade, green roofs, SUDS - all of which can be of biodiversity benefit.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	++	ST LT	<p>This Principle and associated statements should directly help to meet this objective by minimising environmental effects of development through design and construction. The justification for statement 9 refers to the Breeam (for commercial buildings), the Code for Sustainable Homes and minimising energy and resource use. Statement 10 however, makes this seem subject to funding for the urban eco-settlement site. The text is in conflict to the principle which refers to the highest standards being provided and should be revised.</p> <p>This principle should also cross reference sustainable transport options set out in theme 3 as this will be a fundamental way that the site will be minimising carbon emissions through the promotion and integration of walking, cycling and public transport routes.</p> <p>The principle references renewable energy generation and the potential for CHP on site. However, there should be strengthening of this principle and associated sections through linking to the standard BREEAM and future commercial stock, Building Regulations tightening to Zero Carbon, Passive solar design and carbon reduction, design, and the current regard to York's IPS: Sustainable Design and Construction 2007.</p> <p>Operation is absent and it is unclear how this will be delivered. The SA recommends that this need to be addressed.</p> <p>There is no link between this principle and the objective relating to develop a managed response to the effects of climate change. The SA suggests that this needs to be addressed via incorporating adaptation design into the brief.</p>
EN5	Improve air quality in York	+	LT	<p>Helping to minimise environmental impact through construction, design and occupation should lead to a modal shift in transport and energy use. Both of these should help to improve air quality within the immediate area and minimise an impact on the overall city. The cumulative effect of the development proposals on air quality should be appraised alongside the development of the masterplan.</p>

EN6	The prudent and efficient use of energy, water and other natural resources	++	LT	This principle directly includes this within the text following statement 9. It is also acknowledged that a key governmental aim is to achieved the highest standards for residential development and there is the potential for the SPD to specify the aspiration for carbon neutral homes. The standards being set for the site should feed more directly into the sites overall objectives as they set the context for a highly sustainable development. The standards set out cover energy and water. More explicit intention on site for low carbon/ renewable energy resources should be set out within the SPD to make sure proper consideration is given within planning the development and in line with the current IPS: Sustainable Design and Construction 2007.
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	?	?	Following statement 9, waste issues are addressed through the intention to produce a Sustainable Waste and Resources Plan. This is the only reference to dealing with waste. Although this issue is subject to a plan, it should be further explained through examples of the potential for the site. For example, the standards for recycling on site and sourcing local materials at the very minimum.
EN8	Maintain and improve water quality	O	N/a	This principle refers to minimising water consumption but does not specify any examples of how this could be achieved. Specifying the use grey water systems would be beneficial to minimising water use particularly given the predicted effects of climate change with drier summers and wetter winters. It would also help to minimise the demand from the mains supply.
EN9	Reduce the impact of flooding to people and property in York.	I/?	N/a	Managing surface water sustainably through a water strategy is stated under the standards for the site. This should help to control additional fluvial flooding which may be caused by development of the site. The site is within proximity of the River Ouse and should aim to not have any adverse impact on flooding in the city from its development. Such a water strategy also needs to take into account flooding and future climate change. Suggest this is a recommendation that needs to be addressed via incorporating adaptation design into the brief.
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ Principle 4 sets an overarching theme for the whole SPD. The SA considers that this should be the first theme to be addressed within the SPD to highlight and embed this issue up front. ○ There is no link to develop a managed response to the effects of climate change. The SA suggests that this is addressed throughout relevant sections of the SPD via minimising, 				

- through design, the impacts of a changing climate on the built and natural environment
- Paragraph 6.3 references sustainability as a guiding principle to development, It would be beneficial for climate change to also be referenced, particularly given that this is a fundamental cause for being sustainable.
 - Statement 10 conflicts with the principle under which it sits. The Principle states that “the *highest* achievable standards of sustainability are embedded at all stages of the development” but statement 10 states “subject to the availability of funding”. Should the approach be that areas which achieve funding are required to meet the standards of eco town principles because this provides a clear steer for development. The SA strongly disagrees that “subject to funding” should be the premise for this statement as it gives a ‘get out’ clause for high sustainability standards, particularly as the justification states that this is an “exemplar scheme, which will act as a benchmark for later stages of the development.”
 - Paragraph 6.5 and 6.6. should include the following additional standards to BREEAM for commercial properties: on-site Low carbon / renewable energy generation (including possible use of CHP as per the emerging renewable energy viability(REV) study for York) plus a 10% onsite carbon reduction target could be set linked to the REV and Passive solar design. Further to this the SPD should acknowledge and reference York’s current IPS: Sustainable Design and Construction 2007 and its minimum requirements.
 - Paragraph 6.6 should include the following as standards to be achieved on the development: sustainable travel using low emission technologies and minimising adverse impacts to air quality.
 - Operation is absent and it is unclear how this will be delivered. The SA recommends that this need to be addressed.
 - There is no link between this principle and the objective relating to develop a managed response to the effects of climate change. The SA suggests that this needs to be addressed via incorporating adaptation design into the brief.
 - The SA recommends that the site uses grey water systems in order to minimise water consumption.
 - The SA also recommends that cross references should be made to ensure landscaping is considered alongside climate change as a mitigation measure which can be flexible and used to adapt to the changing climate.

Theme 2: Quality Place / Environment

York Northwest SPD Principle 5: To create a high quality locally distinctive place which relates well to the surrounding area.				
<ul style="list-style-type: none"> ○ Statement 11: To achieve a high quality of design throughout the area with distinctive character areas that expresses the site's sustainable credentials whilst reflecting its context. ○ Statement 12: To maintain a strong connection to the site's historic use and the social heritage of the area. ○ Statement 13: To utilise opportunities for key views into, out of and through the area from accessible public areas 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	General comments			Statements 11, 12 and 13 cover issues which are inherently interlinked through the concept of design and heritage
	Headline objective: Reduction of York's Ecological Footprint	+		High quality design will incorporate sustainability principles which will aim to minimise the developments impact on the overall footprint of York.
EC1	Good quality employment opportunities for all	○	N/a	There is no clear link between this principle and the objective
EC2	Good education and training opportunities for all which build the skills of the population	○	N/a	There is no clear link between this principle and the objective
EC3	Conditions for business success, stable economic growth and investment	?/ I	N/a	Enabling development which adheres to strong design principles and delivers a successful site will help to attract investment to the city depending on the mix of uses on site.
EC4	Local food, health care, education / training needs and employment opportunities met locally.	○	N/a	There is no clear link between this principle and the objective
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	+/I	N/a	High quality design will be paramount in order to develop the site in an accessible way which links in with the surrounding communities and the wider city. Statement 13 also offers a direction for developing an approach to views and streetscapes within the development which has the potential to provide a high quality environment linked with accessible routes etc. Further information is given within Principle 6 but this principle should recognise how design contributes to enhancing the urban landscape through not only buildings, but openspace and the public realm. The SA would recommend that this needs integrating

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				into principle 5.
S2	Maintain or reduce York's existing noise levels	+	LT +	The justification for statement 11 recognises the need to screen and mitigate noise levels from adjoining industrial uses and the railway lines which is positive for this objective.
S3	Improve the health and well being of the York population	O	N/a	There is no clear link between this principle and the objective
S4	Safety and security for people and property	I	N/a	In order to maximise the achievement of this objective, the SPD should consider how to design out crime using the design element within the section. Good quality design would inherently use this when considering the masterplanning of the site.
S5	Vibrant communities that participate in decision-making	O	N/a	There is no clear link between this principle and the objective
S6	Reduce the need to travel by private car	I	N/a	This principle should relate to Principle 7 and Theme 3 regarding transport and connectivity given that accessibility and the public realm are interconnected to high quality sustainable design.
S7	Development which provide good access to and encourage use of public transport, walking and cycling	I	N/a	This principle should relate to principle 7 and Theme 3 regarding transport and connectivity given that accessibility and the public realm are interconnected to high quality sustainable design.
S8	A transport network that integrates all modes for effective non-car based movements	O	N/a	There is no clear link between this principle and the objective
S9	Quality affordable housing available for all	O	N/a	There is no clear link between this principle and the objective
S10	Social inclusion and equity across all sectors	O	N/a	There is no clear link between this principle and the objective
EN1	Land use efficiency that maximises the use of brownfield land	++	LT	Using high quality and sustainable design on British Sugar will help to maximise the sites potential as a brownfield site. As part of this is will be important that the wider context of the site is considered in order to make sure this large development integrates well into the existing city.
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	+/ ?	ST, MT and LT	This principle aims to address how heritage assets and the character of the area will be considered through the design principles on site. Statement 11 considers the creating new distinctive areas within the site which would reflect how the present city has been developed today. It also wants the design to "reflect its context". The justification for the policy lists the different elements the masterplanning will take on board to make sure the new development has a relationship with the existing site. The justification states

			<p>that consideration in the masterplan will be given to the wider context, character and setting of York. This is paramount in understanding the relationship of the site to York as the development will have a marked impact on the landscape character of the area. It will be important to ensure that the opportunity is taken to develop the site in a locally distinctive way which harmonises with the existing character and fabric of the city, whilst understanding that the end result will be an alteration to the landscape of the site. Part of this success will be determined through how the site brings together the sites its industrial past and its contemporary context as a cleared site to achieve a true reflection of its context and maintain a strong connection to the site's historic uses and setting. An understanding of the key views will also need to be carefully thought through. Ultimately, the success of which will be determined through masterplanning and implementation of the development.</p> <p>Statement 12 aims to maintain a strong connection to the sites historic use and social heritage explained as the British Sugar factory legacy and archaeology. The design of the site would also like to include key aspect aspects of the historic use with the design. The SA supports an approach which aims to honour the city's heritage through art and street furniture to make it locally distinctive.</p> <p>Statement 13 focuses on key views. This element should not be considered mutually exclusive to statement 11 but as part of implementing high quality design. Creating new views through the site to focal points will help to focus attention on areas such as community spaces. This should also include the potential for views towards other aspects in the city. Creating new views has the potential to make the character of this area in keeping to the wider setting of the city to emulate views towards the Minster for example.</p> <p>The success in meeting this objective lies within the development of the masterplan and its implementation. However, the SA suggests that more examples and consideration should be given to how the SPD deals with heritage and landscape aspects relating to the adjacent and wider city more explicitly to reflect its importance as a theme within the city.</p>
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EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	?	N/a	Statement 11 relates to the design expressing its sustainable credentials and reflecting its context. The bee bank in particular is one of the sustainable issues and part of the context of the site. As such, it should be reflected in the design. There is no reference to this within Principle 5 as it is covered more explicitly within Principle 6. There should be a cross reference or amalgamation of the two principles to fundamentally link the two concepts under design principles for the site.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	+	?	Statement 11 refers to the site sustainability credentials. Sustainability will be key to the high design principles on site and the SA welcomes this reference but thinks it could refer more to what is expected on site or link more effectively to principle 4.
EN5	Improve air quality in York	O	N/a	There is no clear link between this principle and the objective
EN6	The prudent and efficient use of energy, water and other natural resources	O	N/a	There is no clear link between this principle and the objective
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	O	N/a	There is no clear link between this principle and the objective
EN8	Maintain and improve water quality	O	N/a	There is no clear link between this principle and the objective
EN9	Reduce the impact of flooding to people and property in York.	O	N/a	There is no clear link between this principle and the objective
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ The SA recommends that statement 11, 12 and 13 should be amalgamated as the issues are dependent upon each other. A revised statement could focus on design issues which incorporates considerations for sustainability and the historic environment. ○ The SA considers that Principles 5 and 6 would present a stronger focus what can and should be produced through good quality and sustainable design on site if they were amalgamated. This would allow heritage and contact, public realm and green infrastructure to be fundamentally interlinked into the sites design characteristics. ○ The SA suggests that more examples and consideration should be given to how the SPD deals with heritage and landscape aspects relating to the adjacent and wider city more explicitly to reflect its importance as a theme within the city. 				

York Northwest SPD Principle 6: To create a people friendly environment which promotes opportunities for social/community interaction				
<ul style="list-style-type: none"> ○ Statement 14: To provide a framework of linked public realm spaces and routes within which pedestrian / cycle movements have primacy in a safe, pleasant, inclusive and accessible environment ○ Statement 15: To provide multifunctional spaces and facilities within which complementary community activities can take place on a formal and informal basis 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	General comments			This principle could make stronger references and links to Principle 5 regarding high quality design.
	Headline objective: Reduction of York's Ecological Footprint	+	LT	Both statements under this principle aim to make sure cycle and pedestrian routes throughout the city are integrated into the site. Promoting these routes and making them attractive to people will help to minimise the number of vehicle movements of site which will be positive in minimising any additional effects on York's ecological footprint.
EC1	Good quality employment opportunities for all	○	N/a	There is no clear link between this principle and the objective.
EC2	Good education and training opportunities for all which build the skills of the population	○	N/a	There is no clear link between this principle and the objective.
EC3	Conditions for business success, stable economic growth and investment	○	N/a	There is no clear link between this principle and the objective.
EC4	Local food, health care, education / training needs and employment opportunities met locally.	○	N/a	There is no clear link between this principle and the objective.
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	++	LT +	This principle will directly meet this objective as it sets out its aspiration for a hierarchy of streets allowing permeability through the site as well as paths which connect homes and community facilities. Statement 14 in particular will directly help to meet this objective by working into the development linked public realm accessible in a sustainable way, primarily walking and cycling. Statement 5 also reinforces the use of multifunctional spaces to be provided for community and leisure activities. The justification for the latter statement should be more explicit as to what would be considered good types of space and uses on site.

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S2	Maintain or reduce York's existing noise levels	O	N/a	There is no clear link between this principle and the objective
S3	Improve the health and well being of the York population	+	LT	Promoting walking and cycling on site as well as space where people can enjoy leisure time will encourage the resident population to be outside and partaking in activities which will be beneficial to their health and well-being.
S4	Safety and security for people and property	+	ST, LT	The justification for statement 14 references that the paths and public realm should be perceived as safe. This will involve high quality design and should link with principle 5.
S5	Vibrant communities that participate in decision-making	+ /I		This principle will help to lead the population in partaking in activities in the multifunctional openspace, which will help to bring together the community and get them involved in the local area. Community facilities which provide meeting spaces as per the justification for Statement 15 will help to meet this objective directly. A link could be made to theme 1 which covers the provision of community facilities.
S6	Reduce the need to travel by private car	+	LT +	Planning in a network of linked public realm, particularly linked internal and external routes for pedestrian and cyclists primarily, will help to discourage short journeys by car. Joining this with It is anticipated that this should have a positive impact on this objective.
S7	Development which provide good access to and encourage use of public transport, walking and cycling	++	LT	This principle encourages walking and cycling through the network of linked public realm. It is considered that this will have a positive impact on this objective.
S8	A transport network that integrates all modes for effective non-car based movements	+	LT +	This principle denotes a framework of public realm linked by accessible paths for pedestrians and cyclists primarily. This links well with other strategies promoted by principle 7 and theme 3 regarding the green Infrastructure network and transport and connectivity through the site, which could be cross referenced in this section. It is considered that this will therefore have a positive impact on this objective.
S9	Quality affordable housing available for all	O	N/a	There is no clear link between the principle and the objective

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S10	Social inclusion and equity across all sectors	+	N/a	This principle will help to lead the population in partaking in activities in the multifunctional openspace, which will help to bring together the community and get them involved in the local area. Including flexible facilities can promote interaction between different groups of people creating community cohesion within an area.
EN1	Land use efficiency that maximises the use of brownfield land	+	LT +	Given the size of this site a public realm strategy which interlinks spaces and facilities by sustainable modes is a valuable use of the site as this will help to integrate this brownfield site into the wider context of the city.
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	+/?	LT	Having a high quality public realm will help to achieve a quality built environment. For this reason it is anticipated that this principle will be positive on this objective. Ensuring that existing features from York's character or green Infrastructure network will be planned in will be instrumental in the success of achieving this objective.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	+/I	LT	This principle does connect with this objective in that it promotes linkages between spaces and the public realm. Incorporating biodiversity and natural greenspace into the design is accepted as a way of establishing an attractive setting which promotes social wellbeing and cohesiveness. Statement 14 could link more extensively with Principle 7 which specifically references Green Infrastructure and the framework and pedestrian/cycle links to which this statement refers will form a key part of the GI network.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	+	LT	Both statements under this principle aim to make sure cycle and pedestrian routes throughout the city are integrated into the site. Promoting these routes and making them attractive to people will help to minimise the number of vehicle movements of site which will be positive in minimising greenhouse gas emissions.
EN5	Improve air quality in York	+/I		Promoting walking and cycling around the site should encourage fewer cars which should minimise the deterioration of air quality in this location.
EN6	The prudent and efficient use of energy, water and other natural resources	O	LT	There is no clear link between this principle and the objective
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	O	LT	There is no clear link between this principle and the objective

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EN8	Maintain and improve water quality	○	LT	There is no clear link between this principle and the objective
EN9	Reduce the impact of flooding to people and property in York.	○	LT	There is no clear link between this principle and the objective
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ The SA recommends cross referencing the links from GI to transport and connectivity in Theme 3. 				

Theme 3: Sustainable Movement and Connections

York Northwest SPD Principle 7: To deliver new development within a framework of linked, multifunctional green infrastructure incorporating existing landscape areas and biodiversity value, and maximising linkages with the wider green infrastructure network.				
<ul style="list-style-type: none"> ○ Statement 16: New and improved Green Infrastructure should be provided and maintained to meet new needs for formal and informal recreation and leisure use ○ Statement 17: A multifunctional green spine should be created which links new and existing green assets both within the site and the surrounding area ○ Statement 18: To retain existing green assets of value within the site and incorporate these within the new green infrastructure network where possible. 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	General comments			
	Headline objective: Reduction of York's Ecological Footprint	+	LT +	The development of multifunctional Green Infrastructure will be positive for the minimising the developments impact environmentally. This will be through making walking and cycling more attractive along the linked green space helping to reduce the impact on vehicles on site. Further to this, Green Infrastructure is a natural way to mitigate carbon emissions and can provide essential shade to different areas to mitigate urban heat islands.
EC1	Good quality employment opportunities for all	○	N/a	There is no clear link between this principle and the objective
EC2	Good education and training opportunities for all which build the skills of the population	○	N/a	There is no clear link between this principle and the objective
EC3	Conditions for business success, stable economic growth and investment	○	N/a	There is no clear link between this principle and the objective
EC4	Local food, health care, education / training needs and employment opportunities met locally.	○	N/a	Its important for people to have access to recreational space in close proximity to where they live. This principle and the accompanying statements will ensure that that new accessible space is identified on site. Linking the site with a GI network will also make residents from adjacent have more easy access across the site to the Clifton lngs increasing accessibility and connectivity for all.
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and	++	LT +	This objective will be directly achieved through the implementation of openspace and green infrastructure. The inclusion of pathways for pedestrians and cyclists will aid people moving through the area whilst also

	cultural facilities for all			providing leisure and recreational space. The provision of openspace will be developed in line with the core Strategy policy and should provide different types of space for the residential population to use. The principle also states that the built sports provision on site will retained in line with Playing Pitch strategy to be submitted and in consultation with Sport England. This is positive as a way to retain existing facilities which are needed on site. Where the urban eco principles are implemented, it is stated that there should be exemplar levels of openspace. The SA welcomes this approach. The multifunctional green spine links well with a green infrastructure network which will enhance accessibility across the site, potentially to Clifton Ings, for residents adjacent to British sugar enhancing access for all. The success to which this objective is met will be determined through the inclusion and regard for openspace and how the green infrastructure network in included in the masterplanning process.
S2	Maintain or reduce York's existing noise levels	+/I	N/a	Greenspace can be used an effective screen for noise from roads and industrial noises for example. We the site is adjacent to Millfield Lane industrial estate, green Infrastructure could be used to shield and screen noise from any adjacent residential properties. This will essentially depend on masterplanning of site but the SA suggests that this could be referenced within the SPD.
S3	Improve the health and well being of the York population	+	LT	This principle and its associated statements will have a positive impact on this objective. The provision of openspace and greenspace which can be used for leisure and recreation enables both space for physical activity for fitness and places in which relaxation can take place. Evidence suggests that provision to greenspace is positive on people's well-being.
S4	Safety and security for people and property	I		The provision should be planned to be safe for all. The provision of cycle paths and pedestrian routes should consider how safety can be inbuilt through, for example, streetlighting where appropriate.
S5	Vibrant communities that participate in decision-making	O	N/a	There is no clear link between this principle and the objective

S6	Reduce the need to travel by private car	+		Implementing green infrastructure with a focus on routes for pedestrians and cyclists will work toward achieving this objective. It will encourage people to go short distances and use the GI network for access instead of using their car. Essential to this will be the connectivity of the GI network on site to other GI in the city and to the York Central site in order to create sustainable routes across throughout the whole York Northwest site and surrounding area.
S7	Development which provide good access to and encourage use of public transport, walking and cycling	+/I		Implementing green infrastructure with a focus on routes for pedestrians and cyclists will work toward achieving this objective. It will encourage people to go short distances and use the GI network for access instead of using their car. Essential to this will be the connectivity of the GI network on site to other GI in the city and to the York Central site in order to create sustainable routes across throughout the whole York Northwest site and surrounding area. It would also be SPD to pick this issue up more comprehensively within theme 3 as linking this to public transport routes will also help maximise the achievement of this objective.
S8	A transport network that integrates all modes for effective non-car based movements	+		This principle will help to promote connectivity across the site through a GI network. Specifying that there will be specific provision for pedestrians and cyclists will promote this as a good alternative to the car. The impact on this objective is therefore positive.
S9	Quality affordable housing available for all	O	N/a	There is no clear link between this principle and the objective
S10	Social inclusion and equity across all sectors	O	N/a	Provision of openspace on site will be positive in allowing access to recreational space for the new population and may enhance access for adjacent residents where there are known deficiencies.
EN1	Land use efficiency that maximises the use of brownfield land	+	LT	Given that this site is large and of mixed use, the SA considers that the provision of green infrastructure linked throughout the site in a comprehensive way is making good use of the land. Greenspace is demonstrated to be important for health and well-being as well as key to sustainable travel. It also have benefits for adapting to climate change. Instating greenspace on this site is valuable in increasing access across the city and making it attractive for people to live.
EN2	Maintain and improve a quality built environment and the cultural heritage of	+/I		Across the city there is an existing network of green infrastructure which the Core Strategy is aiming to manage as a GI

	York and preserve the character and setting of the historic city of York			network. Forming a green infrastructure on site is therefore in keeping with the character of York.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	+/-		It has been recognised that there is an area of the British Sugar site which is of significant biodiversity value for its solitary bee populations. The SPD sets out in Statement 18 that the Bee Bank that as a designated SINC site the bee bank should be retained within the development of the site. This would also apply, though to a lesser degree, to other areas of interest that may be present. There is also acknowledgment for groups of trees which need protecting to be taken into consideration and the potential for tree preservation orders to be issued. Further to this, the provision of a new green spine throughout the site will make the existing area more diverse by creating further natural habitats for wildlife to live. It is specified that some natural and semi-natural greenspace may be provided off site but it is considered that creating new habitats in openspace, green corridors and peoples gardens will enhance the areas flora and fauna. These should though, as far as is feasible, incorporate existing areas of interest. A consideration for the impact of traffic onsite needs to be incorporated as this may have a negative impact on some species. It will be paramount that the impact of traffic does not affect the rare species on site. The SA welcomes the inclusion of blue infrastructure in this section as well but would like to see an expansion of what this entails for the British Sugar site specifically.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	+	LT	Well designed and multifunctional open and greenspace is important for making urban areas resilient to climate change. As this is a former industrial site, emphasis should be on making it as adapted to climate change as possible in order to minimise its development as a mixed use site on any adverse impacts. Including areas of greenspace is a critical part of this as it acts in a multifunctional way. Plants help to store water not only in themselves but in the soil, which has positive implications for any drainage issues on site and both a fluvial and pluvial flooding. Trees and flora also act as natural carbon sinks which ill help to mitigate greenhouse gases as well as acting to regulate temperatures in particularly dense areas through shade. Whilst this

				principle sets out how greenspace will be used for green routes, sustainable transport links and access, it is only the reference to SUDs which address the potential adapt and mitigate to climate change. The principle should therefore outline more clearly how the multi-functional and linked greenspace links with adapting and mitigating climate change.
EN5	Improve air quality in York	+		Flora, especially trees, act as carbon sinks which can help to mitigate and reduce adverse impacts on poor air quality. This may be particularly useful in areas where vehicles are permitted on site and areas of the site which are in close proximity to the ring road. Encouraging people to use GI for walking and cycling will also promote less use of vehicles which would also be beneficial in limiting vehicle emissions and poor air quality on site.
EN6	The prudent and efficient use of energy, water and other natural resources	+/l		Greenspace can be used effectively for energy conservation through providing essential shading to buildings and homes. Areas on site which are looking to achieve eco-homes status may use greenspace in this way.
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	0		There is no clear link between this principle and the objective
EN8	Maintain and improve water quality	?		The SPD outlines that the site is adjacent to the River Ouse and associated lngs and that any GI network will need to link to this as blue infrastructure. More explicit mention of the role this has to play would be beneficial however. There may a conflict in positioning recreational space next to the river which may result in adverse impacts. However, the SA considers that this will need to be lead by management of the area.
EN9	Reduce the impact of flooding to people and property in York.	+/l		Greenspace on British Sugar is required to be multi-functional. It can be effective in helping to mitigate fluvial and pluvial flooding through areas which are allowed to be flooded and by letting water drain in the soil. Whilst SUDs are mentioned within this principle, further mention of the measures to be taken to limit flood risk using greenspace could be outlined further as part of mitigating to climate change measures.
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ As multi-functional greenspace is clearly outlined in Statement 17, the SA suggests that more examples of how this space will be used are included. For example, it could be used to screen noise, adapt to climate change, mitigate flooding of homes etc. 				

- Whilst this principle sets out how greenspace will be used for green routes, sustainable transport links and access, it is only the reference to SUDs which address the potential adapt and mitigate to climate change. The principle should therefore outline more clearly how the multi-functional and linked greenspace links with adapting and mitigating climate change.
- The SA recommends expanding on the issue of how blue infrastructure could be included.
- In addition to ensuring the retention of existing areas which are valuable habitat, it is recommended that where possible landscaping schemes use native species and wildlife planting. The long-term management plan should consider how the landscape on the site could be managed in a way that promotes biodiversity.

York Northwest SPD Principle 8:

To maximise integration, connectivity and accessibility to and from the site giving priority to sustainable travel in line with the hierarchy of transport users set out in LTP2 and the emerging LTP3.

- Statement 19: To optimise integration, connectivity and accessibility through provision of new and improved pedestrian/cycling, public transport and vehicular routes between the development area and key destinations, prioritising sustainable movement in line with the LTP2 hierarchy of transport users
- Statement 20: New access routes should be provided to serve the development. These should minimise the impact of traffic, and maximise permeability whilst giving priority to more sustainable modes of transport.

Ref	SA Objective	Score	Duration of effect	Appraisal
	Headline objective: Reduction of York's Ecological Footprint	+		Transport is a significant contributor to York's ecological footprint and any progress made to make transport more sustainable should help to reduce this. This principle aims to maximise sustainable transport within the British Sugar site which includes walking, cycling and public transport. Although there is a need to allow vehicle movement onsite, minimising the use of cars for short journeys with routes suitable for pedestrians and cyclists will help to minimise the use of the car. Ultimately a comprehensive travel plan should help to minimise the additional impact the site will have in terms of transport on the ecological footprint through the provision of sustainable routes. The potential provision of a tram-train in the longer term could also offer a solution for wider sustainable access into the site linking it sustainably with the anticipated A59 park and ride, the York Central site and through to the city centre which would have a direct impact on how people opt for moving around the site and through the site.
EC1	Good quality employment opportunities for all	0	N/a	There is not a clear link between this principle and the objective

EC2	Good education and training opportunities for all which build the skills of the population	O	N/a	There is no clear link between this principle and the objective
EC3	Conditions for business success, stable economic growth and investment	+		An effective transport network is essential as a condition for business success. It is paramount that an transport network is in place for the residential community to commute to work from this site to adjacent employment areas, the city or other areas in a sustainable way. Further to this, good multi modal access to the local centre will be critical in order to maintain its viability on site. The success of this will be through the implementation of the Transport masterplan for the site. Some conflict can be presumed from where people commute to and from. Should a vast majority choose t move outside the city in the car, this may have adverse impacts on ring road congestion. However, the SPD does stipulate intentions for different access points to mitigate adverse effects.
EC4	Local food, health care, education / training needs and employment opportunities met locally.	+		The site intends to accommodate a local centre which will be accessed by different sustainable modes of transport. This principle will help to achieve this objective through the provision of an adequate transport infrastructure and masterplan (and associated travel plan(s)) which will implement what is necessary to achieve this on site.
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	+		This principle will be positive for this objective by developing a transport strategy which will allow access to, across and through the site sustainably. The SPD states that connectivity is a major part of the theme and in providing this on site, it should link to wider areas. It is anticipated therefore that connectivity to York's urban and rural landscape as well as other facilities, including other informal openspace, will be included in its implementation.
S2	Maintain or reduce York's existing noise levels	O	N/a	Noise issues are captured within principle 10.

S3	Improve the health and well being of the York population	+		Sustainable transport solutions, especially if they include low emission technologies, should help to minimise the deterioration of air quality when the site has been developed. This will have positive impacts on peoples health. Also, promoting walking and cycling throughout the site in conjunction with green infrastructure will encourage physical activity which is always beneficial to peoples physical and mental health. This principle could link better with Principle 10 regarding addressing the environmental impacts.
S4	Safety and security for people and property	+/l		The approach taken in this principle is that there will be links pedestrians and cyclists segregated from roads around the site. This will help to maintain the safety of those travelling away from other vehicles.
S5	Vibrant communities that participate in decision-making	O	N/a	There is no clear link between this principle and the objective
S6	Reduce the need to travel by private car	++	LT	This Principle will directly help to achieve the objective. The transport requirements on site focus on the provision of sustainable transport across the site and linking into the wider transport infrastructure. The key to the principle is the preference of walking and cycling routes as well as public transport access, all of which will help to reduce the need to travel by car. Also, the site intends to restrict car use to various access points and use a zoning method for vehicle accessibility, which will encourage further use of public transport systems. Whilst this is positive for the objective, planning for cars on site presents a conflict. However, given the large number of residents on site there will be an increase of traffic in the area as a consequence of the development. An increase in the number of vehicles on site is however inevitable. People travelling to services and facilities not provided in near proximity to the British Sugar site will incur journeys on the network. The SA anticipates that the success of meeting the objective will only be seen through appropriate implementation and development.

S7	Development which provide good access to and encourage use of public transport, walking and cycling	++	LT	This Principle will directly meet this objective. In addition to comments for S6, Statement 20 sets out that the masterplanning should ensure that the design of routes through the site delivers a maximum 5 minute walk from all new residential property to bus stops, with shorter distances for areas of specialist housing.
S8	A transport network that integrates all modes for effective non-car based movements	++	LT	The evidence base predicts that the majority of trips from the site will probably be towards the city centre. The approach taken by the SPD is that a variety of measures will be put in place to direct people around and through the site. Cycle and pedestrian access is at the fore of this followed by public transport routes. Part of this is understood to be redirecting existing routes through the site alongside the creation of separate cycle ways. There is also a requirement that there are vehicles zones on site which will help to minimise where people can gain access to and egress from. In addition to these measures, a potential tram-train in the longer term would effectively link into the site adding the variety of methods to reach the city centre over the wider region. In conclusion, this principle and this associated statements will directly meet this objective. In order to fully maximise meeting the transport objectives, there should be more comprehensive reference to the green infrastructure as this directly links in with the provision of pedestrian and cycle routes in order to make an integrated transport network more sustainable.
S9	Quality affordable housing available for all	O	N/a	There is no clear link between this principle and the objective
S10	Social inclusion and equity across all sectors	+	LT	Accessibility to a range of transport modes that will make reaching the city centre and the wider area easier is key in addressing social inclusion. The provision of bus routes within 400m (5 minute walk) or less as proposed by the SPD, will ensure that people with special needs or disabilities should have facilities nearby for using sustainable travel. The success to which this occurs will be determined through the transport masterplan for the sites and the overall masterplanning process (including travel plan(s)) as it depends upon putting this principle into practice.
EN1	Land use efficiency that maximises the use of brownfield land	+	LT	Sufficient Transport infrastructure is essential on sites which were previously of a different use and aim to provide a mix of

				uses. In order to develop the site, a comprehensive understanding of the site requirements for the mix of uses need to be understood and developed. The transport Topic Paper sets out well the likelihood of where trips will be to and from, with key destinations as the City Centre, Clifton Moor, the university and the Foss Island road area as well as locally, Acomb District centre and the adjacent business parks. The SA therefore considers that this is a positive use for the site and the principle will deliver it well in terms of maximising the Brownfield land available.
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	?		One of the primary considerations within the transport work undertaken for the site was the built environment and historic character. The main concern for the SA to raise is the effect of additional traffic on the existing road network and the impact of this on the city itself. The current density of the traffic as well as the size of vehicles is having an adverse impact on the historic fabric and visitor/resident enjoyment of the city. New development needs to consider this very carefully in relation to what is proposed. Whilst LTP3 will be key to this, the promotion through the SPD of bus routes, cycle paths and the potential of tram-train in the longer-term with a Park and Ride facility in close proximity, all set out advantages in terms of decreasing the number of likely vehicles travelling to the city centre and elsewhere. This will make a significant contribution to relieving pressure on the historic core. The full extent to which the effect of the development and its transport options can mitigate adverse effects on the historic fabric of the city will be more fully understood at the masterplanning stage. The SA would advise that this forms part of an accompanying Heritage Impact Assessment.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	?/-		Provision of a transport network may be in conflict with this objective but this is dependent on how new green infrastructure and transport corridors are incorporated and managed on the site. A reduction in transport would be beneficial for wildlife.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	?	MT	The aim to provide and encourage the use of sustainable travel patterns across the site using pedestrian and cycle links as well as public transport is positive for this objective as it will help to minimise greenhouse gas emissions. However, there is an accepted

				level of car use planned on site which will continue to emit greenhouse gasses. Measures could be put in place to mitigate the impact of this.
EN5	Improve air quality in York	?	LT	The aim to provide and encourage the use of sustainable travel patterns across the site using pedestrian and cycle links as well as public transport is positive for this objective as it will help to minimise overall emissions and pollutants into the air. However, there is an accepted level of vehicle use planned on site which will continue to emit pollutants and should be addressed. Principle 9 sets this out more clearly. However, it would be useful for this principle to include information regarding low emission technologies and other measures which could be put in place to mitigate any adverse impacts on air quality.
EN6	The prudent and efficient use of energy, water and other natural resources	I		Using more sustainable modes of transport, particularly walking and cycling reduces fuel consumption for transport purposes. In addition to this, public transport routes will be implemented and the site should promote the use of low emission and energy saving vehicles in order to maximise meeting this objective.
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	O	N/a	It is intended that the levels of air pollution do not increase in this area. More information is given in Principle 9.
EN8	Maintain and improve water quality	O	N/a	There is no clear link between this Principle and the objective.
EN9	Reduce the impact of flooding to people and property in York.	+/I	LT	Helping to mitigate emissions by promoting sustainable travel modes will have a long-term benefit for climate change and therefore on additional flood risk associated with this.
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ The SA recommends that stronger links are made to the aims for Green Infrastructure to provide routes for pedestrians and cyclists. ○ A reference to low emission technologies could be included. ○ A Heritage Impact Assessment is undertaken alongside the masterplanning stage to understand the implications of the emerging transport options on the historic character and setting of the city. 				

York Northwest SPD Principle 9:				
To ensure as many trips as possible are able to be taken by sustainable travel modes and to promote and facilitate modal shift from the car to sustainable forms of travel by maximising opportunities for walking, cycling and public transport.				
<ul style="list-style-type: none"> ○ Statement 21: To optimise the availability and attractiveness of travel options for walking, cycling and public transport, in order to maximise the proportion of trips generated by the development that are undertaken by sustainable modes. ○ Statement 22: To minimise the availability of car parking in line with anticipated modal shifts of trips away from the car 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	Headline objective: Reduction of York's Ecological Footprint	+		Transport is a significant contributor to York's Ecological Footprint but maximising sustainable transport should help to minimise any additional adverse effects of transport emissions on the city. Optimising the use of public transport, walking and cycling will help to reduce the amount of vehicle emissions produced on site. It will also help to promote energy efficient modes for travel helping to reduce the energy consumed on site. Both of these elements will be positive in working towards reducing the ecological footprint.
EC1	Good quality employment opportunities for all	○	N/a	There is no clear link between this principle and the objective
EC2	Good education and training opportunities for all which build the skills of the population	○	N/a	There is no clear link between this principle and the objective
EC3	Conditions for business success, stable economic growth and investment	+		An effective transport network is essential as a condition for business success. It is paramount that an transport network is in place for the residential community to commute to work from this site to adjacent employment areas, the city or other areas in a sustainable way. Further to this, good multi modal access to the local centre will be critical in order to maintain its viability on site. The success of this will be through the implementation of the Transport masterplan for the site. Some conflict can be presumed from where people commute to and from. Should a vast majority choose to move outside the city in the car, this may have adverse impacts on ring road congestion. However, the SPD does stipulate intentions for different access points to mitigate adverse effects.

EC4	Local food, health care, education / training needs and employment opportunities met locally.	O		There is no clear link between this principle and the objective
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	+		This principle will be positive for this objective by developing a transport strategy which will allow access across and through the site sustainably. The SPD states that connectivity is a major part of the theme and in providing this on site, it should link to wider areas. It is anticipated therefore that connectivity to York's urban and rural landscape as well as other facilities will be included in its implementation.
S2	Maintain or reduce York's existing noise levels	O		Noise issues are captured within principle 10.
S3	Improve the health and well being of the York population	+		Sustainable transport solutions, especially if they include low emission technologies, should help to minimise the deterioration of air quality when the site has been developed. Air quality will also be managed through the Low Emissions Strategy which will help to ensure that the site manages and mitigates emissions into the air. This will have positive impacts on peoples p[physical and mental health. Also, promoting walking and cycling throughout the site in conjunction with green infrastructure will encourage physical activity which is always beneficial to peoples health.
S4	Safety and security for people and property	+		The justification for statement 21 sets out the need for attractive pedestrian and cycle routes with appropriate signage, lighting and cycle parking provision. Each of these elements should help to ensure that peoples safety whilst using the routes and their property.
S5	Vibrant communities that participate in decision-making	O	N/A	There is no clear link between this principle and the objective
S6	Reduce the need to travel by private car	++	ST-LT	This Principle will directly help to achieve the objective. The transport requirements on site focus on the provision of sustainable transport across the site and linking into the wider transport infrastructure. The key to the principle is the preference of walking and cycling routes as well as public transport access, both which will help to reduce the need to travel by car. Also, the site intends to restrict car parking, which will encourage further use of public transport systems. It also intends to provide a car club on site which will help reduce peoples perceived lack of car parking and need to own a car.

				Whilst this is positive for the objective, planning for cars on site presents a conflict. However, the car parking standards used as part of modelling work showed that the previous policy in the Draft Local Plan (2005) would have provided too many car parking spaces which would have resulted in more car use on site with negative effects for congestion in this area. A number of vehicles on site however is inevitable and the SA anticipates that the success of meeting the objective will only be seen through implementation and development.
S7	Development which provide good access to and encourage use of public transport, walking and cycling	++	ST-LT	This Principle will directly meet this objective. In addition to comments for S6, the justification for statement 21 sets out the importance of making the sustainable routes attractive for the residents to be persuaded to use alternative forms of travel to the car.
S8	A transport network that integrates all modes for effective non-car based movements	++	ST-LT	The evidence base predicts that the majority of trips from the site will probably be towards the city centre. The approach taken by the SPD is that a variety of measures will be put in place to direct people around and through the site. Cycle and pedestrian access is at the fore of this followed by public transport routes. In addition to this, the reduction of car parking at some points throughout the site will help to enforce that vehicles do not always gain priority on site. It is hoped that having a sustainable transport network coupled by the limited provision of car spaces will help to promote all people to use public transport.
S9	Quality affordable housing available for all	O	N/a	There is no clear link between this principle and the objective
S10	Social inclusion and equity across all sectors	+/-		Accessibility to a range of transport modes which will make reaching the city centre and the wider area easy is key in addressing social inclusion. The provision of bus routes within 400m (5 minute walk) or less as proposed by the SPD, will ensure that people with special needs or disabilities should have facilities nearby for using sustainable travel. There will still be a need to be access and parking spaces however, for car access and parking spaces for people with reduced mobility such as the elderly or disabled, who are dependent on care s and other vehicles (e.g. taxis) to be able to get around. The success to which this occurs will be determined through the implementation of the Transport Masterplan for the sites and the overall masterplanning

				process (including travel plan(s)) as it depends upon putting this principle into practice.
EN1	Land use efficiency that maximises the use of brownfield land	+		Transport infrastructure is essential on sites which are previously of a different use and aim to provide a mix of uses. In order to develop the site, a comprehensive understanding of the site requirements for the mix of uses need to be understood and developed. The transport Topic Paper sets out that the level of parking will be reduced to that stated in the Development Control Local Plan (2005) and that lower amount will be used. This is considered as positive and in line with this objective as it will maximise the ability to use the land for residential and other uses.
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	?/I		One of the primary considerations within the transport work undertaken for the site was the built environment and historic character. The main concern for the SA to raise is the effect of additional traffic on the existing road network and the impact of this on the city itself. The promotion of bus routes, cycle paths and, in the longer-term, the potential of tram-train and Park and Ride facility in close proximity, all set out advantages in terms of decreasing the number of likely vehicles travelling the city centre and elsewhere. Principle 9 aims to minimise the amount of additional cars on site and their impact. Reducing their environmental impacts by promoting reduced car dependency lifestyles should help to minimise any impacts on this objective. The SA suggests that a Heritage Impact Assessment is drawn up alongside the masterplanning process.
EN3	Conserve and enhance a bio-diverse, attractive and accessible natural environment	?/-		Provision of a transport network may be in conflict with this objective but this is dependent on how new green infrastructure and the transport network are incorporated and managed on the site. The reduction of traffic should be beneficial for wildlife but the effects will depend upon implementation.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	I		The aim to provide and encourage the use of sustainable travel patterns across the site using pedestrian and cycle links as well as public transport is positive for this objective as it will help to minimise greenhouse gas emissions. In addition to this, limiting car use on site through reduce car parking facilities aims to minimise emissions made from domestic car use. However, there is an accepted level of car use planned on site

				which will continue to emit greenhouse gasses. It is anticipated that measures could be put in place to monitor and mitigate the impact of this using through Low Emissions Strategy.
EN5	Improve air quality in York	+	LT	The aim to provide and encourage the use of sustainable travel patterns across the site using pedestrian and cycle links as well as public transport is positive for this objective as it will help to minimise overall emissions and pollutants into the air. However, there is an accepted level of vehicle use planned on site which will continue to emit pollutants and should be addressed although it is anticipated that the Low Emissions Strategy will help to manage and mitigate any adverse effects before or as they arise. This principle does state a variety of measures which could be taken forward such as electric vehicles in a car club, electric vehicle charging points to support low emission vehicle use in the area.
EN6	The prudent and efficient use of energy, water and other natural resources	+/I		Using more sustainable modes of transport, particularly walking and cycling reduces fuel consumption for transport purposes. In addition to this, public transport routes will be implemented and the site should promote the use of low emission and energy saving vehicles in order to maximise meeting this objective. Further to this, it is suggested that the site incorporates electric vehicles and charging points in order to promote the use of energy efficient vehicles.
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	+		It is intended that the levels of air pollution do not increase in this area. The Low Emissions Strategy will seek to manage both carbon dioxide and local pollutant levels in the area through the implementation of monitoring and low emission technologies on site.
EN8	Maintain and improve water quality	O	N/a	There is no clear link between this Principle and the objective.
EN9	Reduce the impact of flooding to people and property in York.	I		Helping to mitigate emissions by promoting sustainable travel modes will have a long-term benefit for climate change and therefore on additional flood risk associated with this.
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ Mitigation measures will be need to be fully enforced to prevent an effect on congestion in the area and causing associated environmental impacts ○ The site will require a full Environmental Impact Assessment which should include a transport Assessment for the area. 				

York Northwest SPD Principle 10:				
To minimise the environmental impact of vehicle trips to and from the development and mitigate the impact of residual car trips on the highway network where possible.				
<ul style="list-style-type: none"> ○ Statement 23: To promote the use of more environmentally friendly vehicles ○ Statement 24: To comprehensively mitigate the impact of vehicular traffic where possible through a phased scheme of network improvements to be agreed. 				
Ref	SA Objective	Score	Duration of effect	Appraisal
	Headline objective: Reduction of York's Ecological Footprint	+		Transport is a significant contributor to York's Ecological Footprint but maximising sustainable transport should help to minimise any additional adverse effects of transport emissions on the city. In conjunction with the sustainable travel modes set out in Principle 9, it is anticipated that lower emission vehicles will be in more use in the future. This will help to reduce the consumption of fossil fuels and overall energy consumption as well as promoting the use of smaller, cleaner and lower emissions vehicles. It is anticipated that this will have a positive impact on the ecological and carbon footprint.
EC1	Good quality employment opportunities for all	○	N/a	There is no clear link between the Principle and the objective
EC2	Good education and training opportunities for all which build the skills of the population	○	N/a	There is no clear link between this principle and the objective
EC3	Conditions for business success, stable economic growth and investment	+/!	LT	The justification and requirements for Statement 24 highlight that residual car trips and vehicle traffic will need to be mitigated through improvements to junctions on the local and strategic network. This will be important in order to minimise disruption to the transport network important for residents, commuters and commercial traffic for moving around and through the city. Potentially therefore, this principle will have an indirect positive effect in the long term for this objective.
EC4	Local food, health care, education / training needs and employment opportunities met locally.	○	N/a	There is no clear link between this Principle and the objective
S1	Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all	?	ST / LT	Helping to mitigate the impact of vehicular traffic throughout the phased development should be positive in helping to maintain access across York and to facilities and services set out in this objective. In the short-term, whilst the development is being

				constructed, it is anticipated that there may be a localised negative impact causing delay and congestion. However, this policy does aim to minimise this impact.
S2	Maintain or reduce York's existing noise levels	?		The issue of noise from vehicular traffic is not addressed in this chapter. The mitigation measures to be implemented could cross reference Green Infrastructure as a way to naturally screen any additional noise made.
S3	Improve the health and well being of the York population	+/I		The aim to minimise car use on site and favour lower emission vehicles will be beneficial for peoples health. Particulates and emissions from cars create poor air quality which in turn creates health problems for people within that area. This site will be managed and use mitigation measures as set out by the emerging Low Emissions Strategy, a principle aim of which is to help improve the city's health.
S4	Safety and security for people and property	+/I	ST-LT	Network improvements to mitigate the effects of vehicular traffic could also improve the safety of people travelling to and from the development.
S5	Vibrant communities that participate in decision-making	O	N/a	There is no clear link between this principle and the objective
S6	Reduce the need to travel by private car	?	I	This principle aims to address the environmental impact and in addition to principle 9, promotes the use of lower emission vehicles to run on site. This includes electric cars which are cleaner and lower in emission terms (at the point of use) than regular cars. Whilst this is still in conflict with this objective, there are environmental benefits which need to be balanced against the fact it is car use. However, the number of network improvements set out will be a necessary requirement in order to accommodate the anticipated increase in traffic. Improvement to junctions and the local network will have to be carefully managed however so as to not encourage further car ownership or movement to or from the site. The success of meeting this object and the resolution to this conflict will mainly be seen within further transport assessment and masterplanning and travel planning. It should also be monitored to see the take up rate of electric vehicles and the number of vehicles entering and exiting the development to examine success of its implementation.

S7	Development which provide good access to and encourage use of public transport, walking and cycling	?	I	This policy aims to include lower emission vehicles on site, the impact of which is unknown. Incorporating lower emission public transport vehicles is likely to be positive overall for the development. Improvement made to the network to mitigate the impacts of vehicular traffic could also improve walking, cycling and public routes to the development.
S8	A transport network that integrates all modes for effective non-car based movements	_/?	I	This principle conflicts with this objective as its promoting the use of cars on the site and road improvements which anticipate an increase in vehicle movements. However, the cars promoted are electric vehicles which are more environmentally friendly than normal vehicles at the point of use. It is recognised that given the environmental constraints of the historic environment, it will be paramount that a package of sustainable travel alternatives are included (as specified in Principle 9).
S9	Quality affordable housing available for all	O	N/a	There is no clear link between this Principle and the objective
S10	Social inclusion and equity across all sectors	O	N/a	Improvement to the network to mitigate the impacts of vehicular traffic could also improve walking, cycling and public transport routes into and out of the development thereby improving access for those people who do not have access to a private car and creating equity of access.
EN1	Land use efficiency that maximises the use of brownfield land	O	N/a	There is no clear link between this Principle and the objective
EN2	Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York	?	LT	Aiming to mitigate the environmental impacts of transport solutions for the British Sugar site should be positive for this objective as it is recognised that achieving a modal shift through the provision and use of sustainable transport is the only way to deal with traffic given the characteristics of the historic city. Under statement 23, further information regarding how the site aims to minimise its effect on the historic environment should be set out as it is widely appreciated that the urban form and road structure form an important historical aspect to the city. In addition to this, a further understanding is needed to how environmental effects will impact on the wider historical environment which will be attained through the Heritage Impact Assessment.
EN3	Conserve and enhance a bio-diverse, attractive and	?	I	Improving transport links will be positive in terms accessibility across the site to wider

	accessible natural environment			areas across the city. However, there is potentially a conflict with conserving a biodiverse environment if any of the improvements to be made will effect areas of greenspace which have biodiversity value. Reducing vehicle movements however, will have a positive benefit on the wildlife interest. The SA would recommend that consideration for greenspace alongside any improvements is included in this principle as a measure for mitigation.
EN4	Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	+/I	I	The use of lower emission vehicles as proposed would help to minimise the carbon and greenhouse gas emissions which is important to achieve this objective. However, the promotion of highway mitigation and improvement will need to make sure this does not encourage further car use in and around the site. The success of this will however be through the how this is worked into the masterplan (including travel plan(s)) and the take-up success upon completion of the site.
EN5	Improve air quality in York	+/I	I	Improvements to air quality in this area should be seen through the encouragement to use electric vehicles on site through car clubs, charging points and designated parking spaces. The use of electric vehicles will try to minimise the air pollutants which would otherwise potentially lead to poor air quality. The success of this will however be through the how this is worked into the masterplan and the take-up success upon completion of the site.
EN6	The prudent and efficient use of energy, water and other natural resources	+/?		Using electricity as the fuel for an electric car is more energy efficient that fossil fuels. In terms of the transport footprint, this should help minimise any additional impact. To maximise the positive effect the electricity used within these vehicles should be locally from locally renewable sources. The SA is unsure of the impacts for the road improvements and other mitigation measures on this objective.
EN7	Reduce pollution and waste generation and increase levels of reuse and recycling	+/I		Electric vehicle are cleaner and produce much lower emissions compared to other vehicles. It is anticipated that this will help to reduce air pollution in the new site. There is no anticipated impact on the waste, recycling and reusing materials.
EN8	Maintain and improve water quality	O		There is no clear link between the principle and the objective.

EN9	Reduce the impact of flooding to people and property in York.	O	LT	There is no direct link between the Principle and the objective. However, lower emissions will help to mitigate vehicles effect on climate change which could have a long-term positive influence on additional flooding.
<p>Recommendations:</p> <ul style="list-style-type: none"> ○ The principle refers to environmental impact of vehicles but the only issue referred to is air quality and CO2 reduction through statement 23 regarding environmentally friendly vehicles. Some consideration should be given to noise and its appropriate mitigation, e.g. green infrastructure. 				

Annex 3: Consultation Responses Received

The Former British Sugar/Manor School Draft SPD and accompanying Sustainability Appraisal went out for Consultation in December 2010. As part of the requirements for SA, we are obliged to consult Natural England, the Environment Agency and English Heritage as part of any consultation on the Sustainability Appraisal. The Council received the following responses from the Statutory Bodies:

Statutory Body	CYC Response
Environment Agency	
1. Support SA objectives and the proposed recommendations and mitigation that will take place. Consider that it will have a positive impact on the sustainability of development in the Former British Sugar Manor School Site	No response required.
2. The Water Framework Directive (WFD) is not discussed in Section 11b regarding water conservation and needs to be included for reason that the WFD is now the key piece of EU legislation that applies to all surface water bodies (including lakes, streams and rivers, groundwaters, groundwater dependent ecosystems, estuaries and coastal waters. As part of this inclusion, the Humber River Basin Management Plan should be included as it is a key plan for the protection and improvement of the water environment and contains key measures for Local Authorities.	We agree to add in the WFD and Humber River Basin Management Plan as part of the Baseline in Section 11b.
3. The Baseline data needs to be more clearly referenced in section 11f.	We agree to more clearly reference where the baseline data has come from.
4. Suggest the following for monitoring indicators for section 11b: <ul style="list-style-type: none"> • % of local planning authority's decision made against Environment Agency's flood risk objection • % of SuDS implemented in new developments • EA's water quality data (chemical and biological) • Change in statuses from the Catchment Abstraction Management Plans. 	We agree to add these monitoring indicators to this section. It should also be noted that, as part of the Annual Monitoring Report (AMR), the Council already monitor the first and third bulleted points.
English Heritage	
1. Broadly agree with the assessment of likely affects which the Policy Principles and Statements might have upon those aspects of the City.	No response required.
2. Suggest it would be useful for the Council to state why it considers that an SA is necessary for this SPD given the Town and Country Planning Act 2008's removal of the requirement	We agree to include as statement within the Introductory Section. The guidance requires the appraisal of Area based SPDs which adds detail not covered in higher level documents. This SPD expands upon the detail set out by the Strategic Allocation of British Sugar as

	part of Policy CS4 in the Core Strategy Submission (Publication) and therefore the Council deemed it necessary to undertake a separate Sustainability Appraisal.
3. Figure 4, objective EN2: consider that the it would be preferable if the objective used the same language as PPS5 and suggests: “To conserve those elements which contribute to the significance of York’s historic environment including the special character and setting of the historic city”.	This objective is consistent with the objective in the Scoping Report and Core Strategy suite of SAs. It is therefore considered that this change does not need to be made.
4. Figure 4, objective EN2 sub-objective: suggest amendment to read: “To conserve those elements which contribute to the significance of archaeological sites, historic buildings...etc”	We agree that this change can be made.
5. General: The area covered by the SPD is an extremely large site. In conjunction with York Central Site top the south, the development of these two areas could have a significant impact upon York (not least in terms of traffic movement in the north-western part of the City). It is essential that the British/Sugar manor School site is not considered in isolation but, rather, as part of a comprehensive strategy for this sector if the City which fully considers the likely impacts which the development of these site might have upon the special character rand setting of the historic City.	The Council Note this comment. It should also be noted that an assessment of the strategic sites being taken forward in the city forms part of the Core Strategy Submission (Publication) DPD and further strategic analysis of both the British Sugar and York Central sites can be found in the accompanying SA to the Core Strategy.