

**THE CONSULTATION DRAFT SUSTAINABILITY APPRAISAL
SCOPING REPORT**

**Comments of the Local Development Framework Working
Group**

General

- (i) That site specific information should be added to each section of the report.

Section 1 – Introduction

- (i) That the third bullet point of paragraph 1.2.2 should refer to identifying the key issues for York and particularly for York Central.

Section 2 – Objectives and Structure of the Scoping Report

- (i) That paragraph 2.1.5 should detail the research that has been undertaken and where this information can be accessed.
- (ii) That the paragraph numbering should be corrected.

Section 3 – Integrating Sustainability Appraisal, Strategic Environmental Assessment and the Local Development Framework

- (i) That paragraph 3.1.2 should reiterate the definition of sustainable development given in paragraph 1.1.2.

Section 4 – Environmental and Sustainability Context for City of York

No comments.

Section 5 – Baseline Information

- (i) That paragraph 5.1.2 should be amended to refer to the situation in the York Central area in particular and appropriate data on this should be provided throughout the section.
- (ii) That consistent units of measurement should be used throughout paragraph 5.2.1.
- (iii) That paragraph 5.2.3 created a misconception by stating that York was a relatively affluent city and should be rephrased to refer to the significant pockets of deprivation that existed.
- (iv) That a separate sub-section should be added on incomes, including further information on average incomes to illustrate the significant number in the workforce on low incomes and the disparity between incomes for men and women.
- (v) That it should be ensured that all data included in this section was as up to date as possible.
- (vi) That average house prices for the start of 2006 should be included in paragraph 5.2.19.
- (vii) That figures given in paragraph 5.2.64, regarding the standardised mortality rate for coronary heart disease and strokes being higher than the national average, should be double checked.

- (viii) That the employment and unemployment sub-section should include references to the existing employment base in York and the workforce flows into and out of York.
- (ix) That further details should be provided on travelling families in paragraph 5.2.8.
- (x) That reference should be made to all labour resources in paragraph 5.2.10.
- (xi) That reference should be made to the Interim Housing Needs Assessment in paragraph 5.2.21 and information in the paragraph should be updated.
- (xii) That the housing sub-section should include references to housing market standards.
- (xiii) That a number of different headings should be included in the environment sub-section.
- (xiv) That paragraph 5.2.25 should make reference to the dominance of the city centre by the Minster.
- (xv) That paragraph 5.2.27 should refer to ecology issues that are relevant to York Central.
- (xvi) That paragraph 5.2.29 should make reference to Holgate Beck.
- (xvii) That paragraph 5.2.37 should be checked and updated with reference to York Central.
- (xviii) That Figure 6 should be printed in colour or re-formatted so that it was clear in black and white, and should relate to the text in paragraph 5.2.35.
- (xix) That the unit of measurement in paragraph 5.2.40 should be kilowatt hours.
- (xx) That paragraph 5.2.41 should include reference to the negative aspects of transport, as well as the positive.
- (xxi) That the transport sub-section should include information which is site specific to York Central, with data from local wards.
- (xxii) That paragraph 5.2.45 should explain that the current traffic levels have been achieved by parking management and promotion of alternative forms of transport.
- (xxiii) That the education sub-section should include site specific information on education provision, with data from local wards.
- (xxiv) That an open space, leisure and social facilities sub-section should be added, including site specific information on current provision.
- (xxv) That the final sentence of paragraph 5.2.55 relating to average earnings should be included in the deprivation sub-section.
- (xxvi) That paragraph 5.2.55 should include information on participation in the adult education programme for wards near to the York Central site.
- (xxvii) That the statistics included in paragraph 5.2.72 should be appropriate to an urban area.
- (xxviii) That the access to services sub-section should make reference to GPs, dentists, pubs and other facilities.

Section 6 – Sustainability Issues Facing City of York

- (i) That Figure 7 should include water usage efficiency, reduction of poor air quality and generation of renewable energy on site.

Section 7 – Ecological Footprint

- (i) That paragraph 7.3.2 should begin by explaining that the eco-footprint is the best current overall objective test for ecological sustainability and that the final sentence should be rephrased to ensure that it is accurate.
- (ii) That paragraph 7.3.3 should be re-written to make it relevant to the York Central site specifically.
- (iii) That eco-footprint data from 2001 should be included in paragraph 7.5.1 to allow comparison with the 2006 data.
- (iv) That the figures shown in Figure 9 should be checked and clarified.

Section 8 – Framework and Setting of Objectives

- (i) That an explanation should be included that Figure 11 does not indicate all of the tensions between objectives and that these will be assessed during the Sustainability Appraisal process.
- (ii) That, in relation to objective EC3 in Figure 12, the indicator relating to % growth per annum in tourism earnings should be amended to relate to all earnings and an additional indicator relating to the growth of other jobs should be added.
- (iii) That, in relation to objective S1 in Figure 12, the indicator relating to % of playgrounds meeting National Playing Fields Association (NPFA) standards should be amended to include playing fields and the indicator relating to % increase in public open space and public realm within the area should be amended to show comparison against Local Plan standards.
- (iv) That, in relation to objective S7 in Figure 12, the sub-objective relating to promotion of a reduced modal share target should be amended to refer specifically to car usage.
- (v) That, in relation to objective EN4 in Figure 12, an indicator should be added to measure the sub-objective relating to reduction of greenhouse gas emissions from domestic, commercial and industrial sources.
- (vi) That, in relation to objective EN6 in Figure 12, the sub-objective relating to renewable energy generation within the area should be amended to ensure this, rather just promote it, and the indicator relating to the number of developments that have Building Research Establishment Environmental Assessment Method (BREEAM) standards very good and above should be amended to relate to % of floorspace.
- (vii) That, in relation to objective EN7 in Figure 12, the sub-objective relating to provision of recycling facilities in the design of the development should be amended to ensure this, rather than just encourage it.

Section 9 – What Happens Next?

No comments.

Section 10 – Questionnaire

No comments.