



City of York

LDF | Local
Development
Framework

ANNEX D

**Core Strategy
Submission DRAFT
Sustainability
Appraisal Annexes**
June 2011

Annex 2: Submission Policies and Associated Sustainability Appraisal Matrices

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| Spatial Principle 1: | | | |
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| <p>Future development will be directed to existing settlements in conformity with the following settlement hierarchy (shown on the Key Diagram):</p> <p>i. <i>The Sub Regional City</i></p> <p>York’s main urban area will be the focus for the majority of new development.</p> <p>Within the Sub Regional City, York City Centre is identified as the main focus for retail, leisure and office employment. Acomb is also identified as a District Centre with a key role in delivering retail and other services.</p> <p>ii. <i>Large Villages</i></p> <p>Haxby and Wigginton Strensall/Towthorpe Upper and Nether Poppleton</p> <p>Large Villages will have limited development in proportion to their size to support economic diversification and to meet the needs for both market and affordable housing.</p> | | <p>Haxby is identified as a District Centre with a key role in delivering retail and other services.</p> <p>Villages</p> <p>Bishopthorpe Copmanthorpe Skelton Dunnington</p> <p>Villages are appropriate for small scale development which is appropriate in scale and nature and helps support the viability of some of the existing facilities or addresses local needs, such as, for affordable housing.</p> <p>Small Villages</p> <p>Villages and settlements not identified in (i) (ii) and (iii). In such locations, growth will be restricted to redevelopment and infill only.</p> | |
| | <p>Headline objective: Reduction of York’s Ecological Footprint</p> | <p>++</p> | <p>Comments stand as per the Preferred Options analysis. This Principle supports this objective through directing the majority of the development to the sub-regional area and limiting development in the villages identified settlement hierarchy. The concerns raised in the Preferred Options analysis regarding apportioning development to the villages and the potential for conflict due to increasing the footprint for access to services is abated by the specific inclusion of point 3 linking to SP2. It is still anticipated that there will be a high footprint in villages due to the limitations of public transport although it is acknowledged that only limited development will be allowed in line with location principles in SP2 which cover access to public</p> |

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| | | | transport. |
| EC1 | Good quality employment opportunities for all | +/I | Comments stand as per the Preferred Options analysis, which stated that whilst employment opportunities will not directly be provided, this spatial principle recognises the importance of major development opportunities in supporting economic growth and stability. |
| EC2 | Good education and training opportunities for all which build the skills of the population | + | Comments stand as per Preferred Options analysis, which were positive towards this objective as it recognises that development will be directed to places which have services, such as schools, which can support the community's need. |
| EC3 | Conditions for business success, stable economic growth and investment | + | Comments stand as per the preferred Options analysis. This detailed that although this will not directly bring about development of employment opportunities, it will determine where development will be located which is important for business success. Locating development in this hierarchical should be positive for this given it will be in the more accessible locations with good connectivity to an existing workforce. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | + | Comments stand as per Preferred Options analysis, which were positive towards this objective |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | I | Comments stand as per Preferred Options analysis, which were positive towards this objective although it will be dependent upon implementation of the policy. |
| S2 | Maintain or reduce York's existing noise levels | O | Comments stand as per Preferred Options analysis, which identified there was no clear link with this objective |
| S3 | Improve the health and well being of the York population | +/I | Comments stand as per Preferred Options analysis, which were positive towards this objective |
| S4 | Safety and security for people and property | O | Comments stand as per Preferred Options analysis, which identified there was no clear link with this objective |
| S5 | Vibrant communities that participate in decision-making | I | Comments stand as per Preferred Options analysis, which identified that this could be positive for this objective but it will be determined upon implementation |
| S6 | Reduce the need to travel by private car | +/ I | Comments stand as per the Preferred Options Stage stand for this objective. This was positive with regards to directing development to the urban area to focus employment and housing within areas accessible by public transport helping to encourage a reduction in car use. As |

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| | | | there is also less scope for improving transport accessibility in rural areas and villages, the SA still supports the approach to limit development where there is limited public transport options where it is anticipated that there will still be a reliance on the car. This should be a particular consideration if new small scale developments, which will be also subject to principles in SP2, are proposed to make sure this does not encourage a significant increase in car travel |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | +/ I | Comments stand as per the Preferred Options Stage which is positive in supporting that developments will be located in the most accessible locations as the majority will be located within the urban area and subject to constraints, including accessibility, in SP2. |
| S8 | A transport network that integrates all modes for effective non-car based movements | +/ I | Comments stand as per the Preferred Options Stage which is positive in supporting that developments will be located in the most accessible locations as the majority will be located within the urban area and subject to constraints, including accessibility, in SP2. |
| S9 | Quality affordable housing available for all | +/I | The comments from the Preferred Options stage remain valid for the revised policy against this objective. Affordable and market housing is directly addressed through each stage of the settlement hierarchy. The SA particularly welcomes the specific mention of affordable housing as an appropriate use in Villages as it is known that house prices are high and this will allow people on less income to remain or move to these villages should land be developed for this purpose. Should the need for further housing arise over and above that identified elsewhere in the document, this policy will help to locate it in the most sustainable locations using the settlement hierarchy and furthermore, in locations specifically set out in SP3. |
| S10 | Social inclusion and equity across all sectors | +/I | Comments stand as per Preferred Options analysis, which identified that this could be positive for this objective but it will be determined upon implementation |
| EN1 | Land use efficiency that maximises the use of brownfield land | +/I | Comments stand as per Preferred Options analysis, which identified that this could be positive for this objective but it will be determined upon implementation. The settlement hierarchy directs development to the sub-regional centre which will mean any major brownfield developments will have the opportunity to be(re)developed. Fewer sites would come forward in the villages and only infill or redevelopment would be allowed in the smallest villages. In conjunction with Policy SP2, which prioritises development on previously developed land, this principle will help meet this objective. |
| EN2 | Maintain and improve a quality built environment and the cultural heritage of York and preserve the | +/I | Comments stand as per Preferred Options analysis, which identified that this could be positive for this objective but it will be determined upon implementation. In summary, this included acknowledging that promoting development through the settlement hierarchy would play a vital |

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| | character and setting of the historic city of York | | role in retaining the character and setting of the urban areas, large and small villages. The SA also supported that development in the villages should be complementary to the size of the village and should be subject to strong design principles to reduce any localised impacts. Further analysis of this has been undertaken as part of the Heritage Impact Assessment which identified that compactness is one of York's key characteristics and development in this way could support the overall historic characteristics of the city. This will depend upon implementation of the masterplanning of the site. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | I | The comments from the Preferred Options stage remain valid for the revised policy against this objective. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | + | The comments from the Preferred Options stage remain valid for the revised policy against this objective. |
| EN5 | Improve air quality in York | + | The comments from the Preferred Options stage remain valid for the revised policy against this objective. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | + | Comments stand as per Preferred Options analysis, which were positive towards this objective. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ? | Comments stand as per Preferred Options analysis, which were unclear for this objective. |
| EN8 | Maintain and improve water quality | O | Comments stand as per Preferred Options analysis, which identified there was no clear link with this objective |
| EN9 | Reduce the impact of flooding to people and property in York. | + | Comments stand as per Preferred Options analysis, which were positive towards this objective. |

Spatial Principle 2:

The identification of sites or future areas for development will give priority to previously developed land and buildings and will be subject to

ensuring that such locations meet the following requirements:

- i. York's special historic and built environment including the City's character and setting is preserved and enhanced;
- ii. they are accessible to sustainable modes of transport and a range of services and would not lead to unacceptable levels of congestion, pollution and/or air quality;
- iii. flood risk is appropriately managed to ensure that new development is not subject to, nor contributes to, inappropriate levels of flood risk from the Rivers Ouse, Foss and Derwent and other water courses; and
- iv. they do not adversely effect internationally, nationally and locally significant nature conservation sites, regional, district and local level green corridors and areas with an important recreation function.

No additional Analysis undertaken.

Spatial Principle 3:

In accordance with Spatial Principles 1 and 2 the following sequential approach will be taken to meeting York's future development needs.

- i. Prioritise, development within the Sub Regional City of York (the main urban area).

This will include the delivery of the Major Development Opportunities highlighted on the Key Diagram. Central to this approach is the need to ensure that the considerable potential offered by the York Northwest Strategic Allocations (York Central and Former British Sugar/Manor School) in meeting the City's economic, housing and retail needs is fully realised.

- ii. Brownfield or infill development within identified Large Villages and Villages which is appropriate in scale and nature and helps support the viability of some of the existing facilities or addresses local needs.

- iii. Expansion of the Sub Regional City of York to meet future housing need sequentially in areas A1, A2 and B (shown on the key diagram).

New Strategic Open Space has been identified to be brought forward with each area should they be required.

- iv. To meet future need for employment land the expansion of existing employment uses adjacent to the existing Northminster Business Park, area C (shown on the Key Diagram).

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| <p>The delivery of land for housing and employment will be monitored through the LDF Annual Monitoring Report. The options covered under (iii) and (iv) would only be pursued if necessary to maintain a 10 year supply of potential sites.</p> <p>Small scale non-strategic expansions of settlements for housing or any additional provision of employment land outside the settlements identified will be guided by Spatial Principle 2.</p> | | | |
| | <p>Headline objective: Reduction of York's Ecological Footprint</p> | +/I | <p>Comments stand as per the Preferred Options stage which stated that development in York will inevitably impact on the ecological footprint of the city given the potential population and employment growth, particularly on the consumption of goods, services and resources. It also stated that this policy, in conjunction with the other spatial principles will aim to direct development to the most accessible and least environmental damaging areas which will contribute to making a positive contribution towards this objective and minimising the developments impacts on the carbon / ecofootprint. The identification of the areas of search for urban extensions would allow a comprehensive development to be built incorporating high standards of sustainable design and construction to include accessible facilities, improved access via new transport routes, renewable energy , water and waste systems and low carbon development. Two of the urban extensions that have been identified, extensions Ai and Aii, particularly have the potential to allow CHP energy schemes to be developed given their proximity to Monks Cross retail and business parks. This would help to mitigate the amount of energy and resources used by the new development.</p> |
| EC1 | <p>Good quality employment opportunities for all</p> | +/I | <p>Comments stand as per the Preferred Options stage. This identified that whilst the development will not directly provide jobs it recognises the importance of major development opportunities and the need to deliver employment land sites as well as housing. In particular, the York Northwest development and the site along the A59 have both been identified for employment use.</p> |
| EC2 | <p>Good education and training opportunities for all which build the skills of the population</p> | I | <p>Comments stand as per the Preferred Options stage which identified that this objective will not directly deliver educational facilities but that they should be provided in line with development where necessary to avoid undue stress on existing facilities.</p> |
| EC3 | <p>Conditions for business success, stable economic growth and investment</p> | ++ | <p>Comments stand as per the Preferred Options stage which stated that this spatial principle will help to support economic development given as it supports overall development in the city in terms of the where they should be built. The development of brownfield sites within the sub-regional centre will support the workforce through locating development in close proximity to</p> |

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| | | | other economic functions as well as the majority of the workforce. The identification of the A59 site for employment use should there not be a 10 year supply of sites through the plan period, shows particular support for supporting future economic growth within the city and may attract additional investment. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | +/- | Comments stand as per the Preferred Options stage which stated that this spatial principle will direct development primarily to the sub-regional centre and should therefore help to support existing facilities as well as enable the creation of new ones in line with need. Should any urban extension developments be undertaken in future, these sites will need to ensure that in tandem with the development of housing, facilities and services should not lag behind the development. It also identified the challenge of meeting this objective through infill development which should be considered cumulatively as well as individually in order to ensure adequate access to facilities. The potential urban extensions in the future should also develop in a sustainable way which involves the integration of facilities for people who live and work there. Sites Ai and Aii will already be served by the existing services and retail at Monks cross but should also have additional local facilities incorporated for essential items. |
| S1 | Enhance access to York's urban and rural landscapes, public open space / recreational areas and leisure and cultural facilities for all | I | Comments stand as per the Preferred Options stage. This stated that new development will increase the need for additional open space. This will need to be provided on site as well as help to address any deficiencies within the local vicinity. Furthermore, the spatial principle and key diagram identify new strategic open spaces in line with the potential areas of search for urban extensions. This will be positive for this objective. |
| S2 | Maintain or reduce York's existing noise levels | O | Comments stand as per the Preferred Options stage which identified that there was no direct link between this spatial principle and the objective. |
| S3 | Improve the health and well being of the York population | O | Comments stand as per the Preferred Options stage which identified there was no direct link between this policy and the objective. However, there was recognition that directing the development towards the sub-regional centre may require more health facilities to be developed to ensure sufficient supporting facilities for the population. |
| S4 | Safety and security for people and property | O | Comments stand as per the Preferred Options stage which identified that there was no direct link between this spatial principle and the objective. |
| S5 | Vibrant communities that participate in decision-making | I | Comments stand as per the Preferred Options stage of the process which identified that bringing forward land for development such as the areas of search for urban extensions should allow for the creation of new sustainable communities. This should include additional community facilities leading to greater participation and access to decision making processes. |

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| | | | Community development and effective working with both existing and new communities of essential to the success of sustainable urban neighbourhoods. |
| S6 | Reduce the need to travel by private car | + | Comments stand as per the Preferred Options stage. This stated that this Spatial Principle will primarily direct development to the sub-regional centre followed by the large villages will both have greater accessibility to existing services, facilities and transport routes. This proximity should encourage more walking cycling and use of public transport for travel in and around York. The SA supports the principle in limiting development to smaller villages and other areas as this helps to meet this objective. The revised policy does advocate employment development in the vicinity of the A59 which will need to have enhanced public transport access in order to be sustainable. A proposed park and ride facility set out in LTP3 (which is subject to funding) in this area would make this location more accessible for employees and businesses. The SA suggests that without this facility, this location would increase peoples use of the car for commuting purposes and conflict with this objective. The sustainability of the potential urban extensions is dependent on securing a good public transport service into these areas and to the city centre. The success of these sites are dependent upon the public transport package and the promotion of walking and cycling. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | ++/l | Comments stand as per the Preferred Options stage. This stated that this Spatial Principle will primarily direct development to the sub-regional centre followed by the large villages will both have greater accessibility to existing services, facilities and transport routes. This proximity should encourage more walking cycling and use of public transport for travel in and around York. The SA supports the principle in limiting development to smaller villages and other areas as this helps to meet this objective. The revised policy does advocate employment development in the vicinity of the A59 which will need to have enhanced public transport access in order to be sustainable. A proposed park and ride facility set out in LTP3 (which is subject to funding) in this area would make this location more accessible for employees and businesses. The SA suggests that without this facility, this location would increase peoples use of the car for commuting purposes and conflict with this objective. Furthermore, any development on sites Ai, Aii and B should ensure there are suitable cycle and pedestrian routes to main destinations and local bus stops within close proximity to promote sustainable travel on site. |
| S8 | A transport network that integrates all modes for effective non-car | + | Comments stand as per the Preferred Options stage which identified that this principle should promote use of the existing infrastructure available. It will need to ensure that all of the major |

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| | based movements | | development sites identified are well connected to the existing transport network to promote sustainable transport use and minimise the use of the car as a primary mode of travel. |
| S9 | Quality affordable housing available for all | + | Comments stand as per the Preferred Options stage. This stated that the majority of housing will be directed towards the sub-regional centre and are particularly reliant on the major strategic allocations. The spatial principle should support this objective by directing development to the main sub-regional centre but also allowing other development in the villages to ensure affordable housing can be built in response to need. Furthermore, should there be a lack of a 10 year supply for housing, the areas of search for urban extensions will allow development to continue and meet the housing need identified through the evidence base studies. |
| S10 | Social inclusion and equity across all sectors | +/- | Comments stand as per the Preferred Options stage which identified that bringing forward the majority of development within the sub-regional centre should help to lessen the extent of deprivation and spur regeneration in certain areas. It will be important to ensure that development does not exacerbate inequalities between areas but help to achieve this objective. |
| EN1 | Land use efficiency that maximises the use of brownfield land | +/? | Comments stand as per the Preferred Options stage which identified that this spatial principle will help to meet this objective. However, it is acknowledged that the future areas of search for urban extensions conflicts with this objective as they are Greenfield sites. The SA supports however, that these sites will only be considered should a lack of 10 years supply of sites become apparent. Furthermore, the social benefits which the site will provide should also prove a positive case for their development and it should help to also support economic objectives whilst minimising other environmental impacts. |
| 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 | +/- | Comments stand as per the Preferred Options stage. This stated that the hierarchy for development locations and types of sites reinforce the preservation of York's character. Development will still need to be complementary to its historic context in both the sub-regional centre and particularly in the villages. Further analysis at this submission stage would also like to support the approach to the search for potential urban extensions which have taken into consideration important environmental and social constraints, including the areas designated in the Greenbelt Appraisal evidence base. The sites identified are areas outside of the designated constraints. Many of the impacts will depend upon implementation and masterplanning of the site but the Heritage impact appraisal has identified that the creation of new strategic openspace could help to create new green wedges and will develop York to the city's natural |

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| | | | limit. Development in these locations would need to minimise its impact upon identified views to the Minster but would support a more modern development that added a new layer of history to the built footprint of the city. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | + | Comments stand as per the Preferred Options stage, which stated that the potential areas search for urban extensions could potentially have negative impacts on this objective. However, the location of designated sites for nature conservation have been taken into consideration when identifying these locations. The sites would also be accompanied by new strategic openspace which may offer the potential to increase biodiversity in these areas. The impact of these potential sites will depend upon their implementation. The SA still also supports that directing the majority of development to the sub-regional area should also help to minimise effects on biodiverse areas in the city. All major sites for development will have to have a comprehensive understanding of the sites biodiversity to ensure any areas of high value will be maintained. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | +/- | Comments stand as per the Preferred Options stage. Comments detailed that directing the majority of development to the areas with the most services and accessible public transport services will help to minimise the number of cars journeys and could have positive influence on carbon emissions. In conjunction with other policies set out in the Core Strategy, development will have to adhere to high standards of design and construction which should have a positive influence in minimising any environmental impacts of the development. The major development sites have particularly good opportunities to implement large scale sustainable schemes which incorporate measures to deliver low carbon development. The identified sites Ai and Aii of the areas of search for urban extensions also have the potential to develop sustainable communities which have particularly high environmental standards. Of note, is the potential to develop CHP technology linked to Monks Cross business and retail parks. |
| EN5 | Improve air quality in York | ? | Comments stand as per the Preferred options stage. Development within the sub-regional centre will need to be sensitive to air quality but should help to encourage people to use more sustainable forms of transport, which should have positive impacts on reducing related greenhouse gas emissions. Concentrating development in this location however, has the potential to adversely impact the identified AQMAs. Development proposals will need to ensure that it will not adversely impact air quality and ensure mitigation measures are taken where necessary. |
| EN6 | The prudent and efficient use of | I | Comments stand as per the Preferred Options stage which stated that this policy does not |

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| | energy, water and other natural resources | | directly influence this objective. However, the strategic development identified and the location of potential urban extensions Ai and Aii have the opportunity of maximising energy, water and resource efficiency measures. Implementing these measures will have to be in scale and context to the historic character and context of the site to minimise environmental impacts. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ? | Comments stand as per the Preferred Options stage. In summary this acknowledges that development will lead to an inevitable rise in waste. However, this should be mitigated through sustainable waste processing. |
| EN8 | Maintain and improve water quality | O | Comments stand as per the Preferred Options stage which identified that there was no clear link between this spatial principle and the objective. |
| EN9 | Reduce the impact of flooding to people and property in York. | +/- | Comments stand as per the Preferred Options version which stated that flooding has been taken into consideration a key constraint to development as part of Spatial Principle 2. Consideration for flooding will also be influence whereabouts this development can take place within the sub-regional centre and on any future areas of search for urban extensions. Developments should ensure they do not adversely impact on flood risk. |

Policy CS1: The Role of York's Green Belt

The primary purpose of York's Green Belt is to preserve the historic character and setting of York. It also has a valuable role in conserving the countryside.

The general extent of York's Green Belt, illustrated on the Key Diagram and detailed boundaries to be established through the Allocations DPD, will ensure development is in accordance with Spatial Principles 1, 2 and 3.

Land outside the Sub Regional City, Large Villages and Villages as identified in Spatial Principle 1, will be included within the general extent of York's Green Belt, with designated Small Villages being washed over.

The general extent of the Green Belt and detailed boundaries will endure until at least until 2031.

Only very restricted types of development appropriate to the purposes of the Green Belt will be permitted.

No additional Analysis undertaken.

Policy CS2: York City Centre

The Local Development Framework (LDF) Vision for the City Centre is to preserve its special qualities and distinctiveness whilst helping to achieve the economic and social aspirations of the plan. This will be delivered by the production of an AAP that addresses the key elements highlighted below.

1. Delivering the following quantum of development in the City Centre:
 - i. provision of between 99,000 and 112,000sq m of offices (B1a) by 2031 at Hungate Major Development Opportunity and York Central Strategic Allocation (as identified on the Key Diagram);
 - ii. provision of around 28,000sq m of comparison retail by 2020 at Castle Piccadilly Major Development Opportunity and the Stonebow area;
 - iii. provision of between 20,000 and 25,000 sq m net of comparison retail on York Central Strategic Allocation post 2020, following the development of Castle Piccadilly Major Development Opportunity (as identified on the Key Diagram) and the Stonebow Area, subject to detailed impact testing; and
 - iv. provision of around 987 dwellings by 2031. This will include 557 dwellings at the Hungate Major Development Opportunity (site with planning permission) and the remainder on other sites within the City Centre.
2. Achieving the following principles:
 - i. preserve and enhance the existing heritage and historic character of York City Centre whilst encouraging contemporary high quality developments that add to the sense of place and create a prestigious and desirable location for thriving businesses;
 - ii. enhance the quality of the City Centre as a place and rediscover the outstanding heritage of the City with reanimated and revitalised streets, places and spaces such as Parliament Street and Library Square and with improved settings to showcase important assets such as the Minster and Clifford's Tower;
 - iii. enhance the gateway streets leading into the City Centre to give a better sense of arrival, to improve pedestrian and cycle routes and to encourage visitors to explore further. Streets include Gillygate, Goodramgate, Peasholme Green and Stonebow, Walmgate and Fossgate, Piccadilly, Micklegate and Bootham;
 - iv. design streets around function, not vehicle movement, creating civilised streets that make the City Centre easy, enjoyable and safe to move around;

- v. create a strong evening economy by diversifying the current functions of the City Centre to provide more for families and older people and encouraging activities to stay open later in the evening;
- vi. add to the City Centre's retail offer and retain and strengthen independent shops;
- vii. positively promote and integrate the presence, roles and contributions of the University of York and York St John University in the City Centre;
- viii. deliver sustainable homes that provide quality, affordability and choice for all ages, including a good mix of accommodation;
- ix. provide community and recreation facilities to encourage healthy, active lifestyles including the provision of green amenity spaces in the City Centre to help to combat the effects of higher temperatures, air pollutants, flooding and climate change; and
- x. support the provision of strategic leisure facilities and investigate land availability to build a city centre swimming pool and ancillary facilities.

3. Delivering the enhancement and development of eight 'Areas of Change':

i. Heart of the City

Creating redesigned, revitalised and civilised streets, squares and spaces within the Heart of the City that provide a high quality environment to showcase events, festivals and markets with improved links between the walls, rivers and other public open spaces, aided by an increased area of Footstreets to improve pedestrian permeability.

ii. York Central Strategic Allocation

Delivering improved access and movement between the York Central Strategic Allocation and the wider City Centre. Part of the York Central Strategic Allocation will form a major extension to the City Centre. A Supplementary Planning Document (SPD) for York Central will deliver a new urban quarter with retail, leisure and cultural facilities and a new central business district adjacent to York Railway Station.

iii. City Cultural Park

Creating a City Cultural Park by connecting and unifying the range of existing open spaces and promoting the contribution and activities of the institutions in the Cultural Park with high quality public realm enhancements, improved links and interpretation of the historic environment.

iv. Hungate Major Development Opportunity

Supporting the completion of the development of the Hungate Major Development Opportunity which will increase the provision of high quality homes, office and ancillary retail space in the City Centre and ensuring that the Hungate area is well integrated with the City Centre.

v. *Layerthorpe and York's Production Park*

Creating new employment opportunities and improving the appearance of the area to create a fitting gateway to the city centre. Supporting the creation of a new 'Production Park' facing the River Foss for creative enterprises and green technologies.

vi. *Castle Piccadilly Major Development Opportunity and York's Civic Park*

Supporting the redevelopment of the Castle Piccadilly Major Development Opportunity, predominantly for the provision of retail space. This development will enhance the setting of the Castle Piccadilly area including creating a world class civic space around Clifford's Tower. Also supporting the creation of a 'Civic Park' where the Rivers Ouse and Foss meet, and where the Eye of York and Clifford's Tower are found to complement the improvements at the Castle area and provide a new amenity and leisure facility.

vii. *The Barbican*

Supporting the redevelopment of the Barbican Centre and adjacent land and ensuring the Barbican Centre is easily accessible and well integrated with the City Centre.

viii. *Micklegate*

Revitalising the environment of Micklegate and connecting streets and protecting the retail and leisure offer.

4. Promoting accessibility and movement, particularly between the Areas of Change:

The LDF will provide a high quality public transport system to improve access into and across the City Centre, helping to reduce congestion and improve air quality. The LDF will support the prioritisation of pedestrian and cycle movement, including secure cycle parking and improvement of linkages between key places such as the railway station; York Central Strategic Allocation and the National Railway Museum; the Minster; Castle Piccadilly Major Development Opportunity; Hungate Major Development Opportunity; and the universities.

Pedestrian permeability through the City Centre will be improved through new developments that improve legibility. The LDF will increase access to and make better use of the city walls and riversides and better integrate peripheral gateway streets into the *Heart of the City Area of Change*.

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| | <p>Headline objective: Reduction of York's Ecological Footprint</p> | <p>++/l</p> | <p>One of the key elements of the policy focuses on the promotion of accessibility and movement through the city centre. Section 4 details the Council's intention to provide a high quality public transport system to improve access in and across the city centre, particularly</p> |
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| | | | <p>promoting pedestrian permeability as well as improving key linkages between the areas of change outline in the policy and footstreets, river sides, the city walls and other green spaces. These actions may have a positive impact for the reduction of the ecological and carbon footprints by encouraging people to use sustainable transport modes. This will have a positive impact on emissions reduction. Further to this the key principles set out in section 2 of the policy states that they anticipate using green amenity spaces in the city centre to help combat the effects of higher temperatures, air pollutants, flooding and climate change, all of which are positive of this objective.</p> <p>The quantity of development to be taken forward by the plan will have an inevitable impact on the ecological footprint of the city. This should be minimised however using sustainable design and construction as well as other methods to minimise its impact on the city centre as well as the ecological footprint.</p> <p>The SA welcomes this level of detail in the Core Strategy to set the strategic approach for the CCAAP overall. The success of meeting this objective however will depend upon further detail presented in the AAP as well as through implementation. The SA considers the Core Strategy to have a potentially positive impact in the long-term.</p> |
| EC1 | Good quality employment opportunities for all | ++ | <p>The revised policy sets out several strategies that indicate a variety of employment opportunities within York City Centre. The Core Strategy policy states this will occur through: expanding and diversifying the early evening economy, enhancing the retail function, strengthening the city's cultural and tourism role as well as the support for the universities. This is more specific than previous versions of the policy and will be further defined in the CCAAP, which will be accompanied by a separate SA.</p> |
| EC2 | Good education and training opportunities for all which build the skills of the population | + | <p>The revised policy states the CCAAP will support and integrate the growth and promote the contributions of the two universities who have a strong representation in the city centre. This is directly positive for this objective. There is no mention of other educational establishments and their connection with the CCAAP. It is anticipated that there will be some crossover from the education and training policy into the CCAAP which will be picked up in the main AAP document.</p> |
| EC3 | Conditions for business success, stable economic growth and | ++ | <p>Comments stand as per Preferred Options analysis, which were positive towards this objective. The revised City Centre policy recognises that the heritage assets in the city centre</p> |

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| | investment | | <p>has a direct influence on tourism within the city. It aims to promote contemporary high quality developments and a desirable location for thriving business as well as the conservation of heritage assets which already make the city special and unique. The policy also wants to improve the evening economy by diversifying the current functions of the city centre to make it appeal to a wide audience after the main retail hours have finished. Further to this, the policy details areas of change which will enhance and link the city more comprehensively to existing adjacent area of the city to maximise the overall experience and quality of the York environment. In combination with the variety of other principles set out in the policy, this ambition to preserve, enhance and add to the historic environment, will have a significantly positive influence on this objective.</p> <p>Accessibility is also key agenda for this policy. Section 4 details the Council's intention to provide a high quality public transport system to improve access in and across the city centre, particularly promoting pedestrian permeability as well as improving key linkages between the areas of change outline in the policy and footstreets, river sides, the city walls and other green spaces. This will have a positive impact on enabling conditions for business success and easy access for tourist, residents and businesses.</p> |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | + | <p>Comments stand as per Preferred Options analysis, which were positive towards this objective. The policy aims to continue to deliver the city's retail and add to the offer through the development of Castle Piccadilly and the Stonebow area. In addition to this the policy strongly supports all uses within the city centre which should help to make sure that a variety of jobs are maintained as available. In addition to this the policy aims to deliver a proportion of housing development which will house people locally to the services and help to maintain the viability of some of the city centre's services and facilities as well as deliver strategic facilities to support the overall population, such as a new swimming pool.</p> |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | + | <p>The revised justification to the policy refers to a Public Realm Strategy and Movement and Accessibility Framework to underpin the AAP to help deliver enhanced routes and connectivity around the city centre. The policy also promotes the principle "provide community and recreation facilities to encourage healthy, active lifestyles including the provision of green amenity spaces in the City Centre to help to combat the effects of higher temperatures, air pollutants, flooding and climate change". This should have a positive influence on this objective. Maintaining and enhancing the cultural aspects of the city centre is also a key to</p> |

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| | | | this policy and will help to meet the objective. |
| S2 | Maintain or reduce York's existing noise levels | O | Comments stand as per Preferred Options analysis, which identified there was no clear link between this policy and the objective. The SA for the CCAAP could consider any indirect impacts caused by the late opening of facilities and activities when more detail is provided of how this is to be achieved. |
| S3 | Improve the health and well being of the York population | +/I | The revised policy sets out that the CCAAP wants to encourage facilities and services that aid active, healthy lifestyles. This element will help to meet this objective in addition to enhancing the connectivity and functionality of the city centres transport routes and public realm enabling better access on foot and by bicycle, both of which will improve fitness and health. |
| S4 | Safety and security for people and property | I | Comments stand as per Preferred Options analysis, which indicated that the effects would be determined upon implementation. |
| S5 | Vibrant communities that participate in decision-making | ? | The policy no longer references a framework for decision making, which was originally positive for this objective. The SA recommends that this is reinstated in the strategic policy to be carried through into the CCAAP. However, the Area Action Plan will present an opportunity for people to get involved in determining what is required in the city centre and how this may be implemented. The SA is unsure of the outcome of this at this stage however. More detail will be needed through the City Centre AAP process. |
| S6 | Reduce the need to travel by private car | +/I | Comments stand as per Preferred Options analysis, which were positive towards this objective although it will be determined upon implementation of the AAP. The Public Realm Strategy and Movement and Accessibility Framework aim to improve linkages as well as encourage sustainable transport, which is supported by the SA. Section 4 of the policy directly achieve this objective through promoting pedestrian permeability through the city centre. Two of the key principles set out in section 2 of the policy also have a directly positive influence on this objective. These are: "enhance the gateway streets leading into the City Centre to give a better sense of arrival, to improve pedestrian and cycle routes and to encourage visitors to explore further" and "design streets around function, not vehicle movement, creating civilised streets that make the City Centre easy, enjoyable and safe to move around". This should help to make the city more accessible as well as minimising the vehicle movement. The measures to enable this are yet to be detailed in the CCAAP and therefore at this stage the effects will be determined upon implementation. |
| S7 | Development which provide good access to and encourage use of | ++/I | As above (objective S7) In addition to these comments the proposed development site will also make use of existing |

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| | public transport, walking and cycling | | networks and the aims to improve linkages between them as well as throughout the city centre will have a positive impact on this objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | +/l | As above (objective S7) |
| S9 | Quality affordable housing available for all | + | <p>The revised policy sets out in section 1 of the policy that the city centre will provide around 987 new dwellings by 2031 of mixed tenure and type. 557 dwellings will be provided at the Hungate Major Development Opportunity while the rest are provided on other city centre sites. This is positive for this objective in making sure properties in this area will be available in the future for people of all incomes and needs. Further to this one of the principle for the future of the city centre is to: "deliver sustainable homes that provide quality, affordability and choice for all ages, including a good mix of accommodation". The SA supports this approach and anticipates that more information will be provided through the associated Area Action Plan.</p> <p>The numbers of properties feed into the overarching housing Policy (CS6): The Scale and Distribution of Housing". The SA recommends reading the analysis of this policy to understand the whole context for housing development within the city.</p> |
| S10 | Social inclusion and equity across all sectors | +/l | The statement referring to a "framework for decision making" has been removed which weakens the policies achievement of this objective compared to its previous inclusion. It could be argued that the AAP itself will provide this in due course. The policy does detail a number of improvements which should prove positive for the different sectors of society through enhanced accessibility, new functions and different community and recreational facilities. In addition to this there is are several points which encourage the inclusion of different institutions such as the universities and those in the cultural quarter between the station and the Minster. This will enable a variety of people to engage with the CCAAP and associated activities process.. |
| EN1 | Land use efficiency that maximises the use of brownfield land | + | The policy specifically mentions Hungate, Castle Piccadilly and the Stonebow area of the city in terms of development. In addition to this, redevelopment of the Barbican Centre is detailed. The seven areas of change detailed are all locations which either need to be redevelopment or are in need of enhancement. Any redevelopment of these areas would help to meet this objective although it is acknowledged that maximising the use of the sites will require a |

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| | | | balance of competing land use pressures.. Previous SA comments regarding the city centre remaining as the focus for retail, employment and leisure as a hook to direct development still stand. |
| 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 principle roles of the policy is to preserve and enhance the setting and character of the city centre in as many ways as possible. The policy acknowledges not only the historic assets of the city but also the built fabric which contributes to the overall quality and special sense of the that the city centre offers. The policy will undertake this through the conservation of existing assets, redevelopment or enhancement of certain areas to help them make more of a significant contribution to the city overall, promoting and strengthening existing uses and improving accessibility and movement into and through the city centre. The policy will directly meet this objective is this is all successfully undertaken. More specific detail is anticipated to be presented through the City Centre AAP. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ? | The policy does not specifically reference biodiversity but does have want to pursue greenspace as a key theme within the City Centre. The justification states that the AAP will take forward enhancing nature conservation and green infrastructure, which is positive for this policy. The justification also states the intention for the AAP to bring the waterfront and rivers back as a central focus for the city centre. This should have appositive influence on this objective. In addition to this, one of the areas of change is for a new civic park which may provide an opportunity to include aspects of the natural environment. the policy acknowledges the role of the It is recommended that more information ill be included in the final AAP document. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | +/l | The SA recognises the revised policy details how greenspace will be considered to help combat higher temperatures, air pollutants, flooding and climate change impacts. This is positive in its emphasis for meeting this objective. The SA anticipates that the Public Realm Strategy and Movement and Accessibility Framework will also set out more clearly measures for sustainable transport and walking/cycling across the city which will help to minimise emissions and fulfil this objective in addition to section 4 of the policy. The SA would like more information regarding how renewable energy may be scoped into redevelopments and what may be applicable to this area but this may be set out further within the CCAAP SA and draw upon other policies within the Core Strategy. Further analysis of this will be made within the SA for the AAP. |
| EN5 | Improve air quality in York | +/l | Improving air quality is mentioned in different parts of the revised policy. The policy aims to |

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| | | | use greenspace to help combat air pollutants. The policy also hopes that improvements to the transport system will deal with both improved congestion and improving air quality. The SA welcomes this approach set out n be expanded upon within the CCAAP. The SA suggests that specific measures are included within the CCAAP in order to implement these intentions and achieve this objective and that cross reference is made to the new Air Quality policy within the Core Strategy. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | ? | The SA would like more information regarding how renewable energy may be scoped into redevelopments and what may be applicable to this area but this may be set out further within the CCAAP SA and draw upon other policies within the Core Strategy. Further analysis of this will be made within the SA for the AAP. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ○ | Comments stand as per Preferred Options analysis, which stated that this policy was not related to this objective. |
| EN8 | Maintain and improve water quality | ○ | Comments stand as per Preferred Options analysis, which stated that this policy was not related to this objective. |
| EN9 | Reduce the impact of flooding to people and property in York. | ? | Flooding is an important consideration for this city centre and this policy has included it as such indicating that the use of greenspace could be used to combat flooding. The remit of redesign and the high quality environment could also be widened to be a mitigation measure. Development must take consideration of other policies set out in this plan and evidence base such as the Strategic Flood Risk Assessment and its associated sequential tests for development. It is anticipated that this issue will be dealt with in more detail in the CCAAP. |

Policy CS3: York Central Strategic Allocation

The LDF will provide a new piece of City with exemplar mixed development including a world class urban quarter forming part of the City Centre with a new central business district, expanded and new cultural and visitor facilities, retail and residential uses and a new vibrant residential community.

The York Central Strategic Allocation will provide:

- i. Offices (B1): 87,000 to 100,000 sq m;
- ii. Retail (comparison): 20,000 to 25,000 sq m net post 2020 and following the development of Castle Piccadilly, subject to detailed impact

testing showing no significant impact on city centre retail, that traffic and air quality implications are acceptable and that effective pedestrian linkages and other measures to integrate it effectively with the City Centre can be achieved;

- iii. Residential: around 1,165 dwellings;
- iv. Culture, leisure and tourism facilities: to be determined through masterplanning.
- v. Open space, high quality public realm and supporting social infrastructure.

The site is being promoted within the Leeds City Region as an Urban Eco-Settlement, with sustainable living as the core concept in the creation of the new development. Development will seek to deliver PPS1 standards for Eco Towns within the context of its brownfield location.

Development within the York Central site will be permitted in accordance with the principles of development set out below, to be defined further through the preparation of a Supplementary Planning Document (SPD) produced with the involvement of stakeholders and the community.

The principles of development are:

- i. to create a new mixed-use urban quarter for York including a range of commercial, residential and leisure uses together with new retail provision which helps to meet identified future capacity in the city;
- ii. to provide a new central business district with exemplar high quality new offices;
- iii. to enhance the cultural area around the NRM within high quality public realm and improving connectivity of the area to the rest of the city centre;
- iv. to create a distinctive new place of outstanding quality and design which complements and enhances the existing historic urban fabric of the city;
- v. to maximise the benefits of sustainable economic growth;
- vi. to create a sustainable new community with a range of housing types and tenures;
- vii. to ensure provision of social infrastructure which meets the needs of the new community including sports, leisure, health, education and community facilities and open space;
- viii. to maximise integration, connection and accessibility, particularly at York Station;
- ix. to ensure as many trips as possible taken by sustainable travel modes and to promote and facilitate modal shift from the car;
- x. to minimise the environmental impact of vehicular trips;
- xi. to deliver development within a Green Infrastructure framework which maximises linkages with the wider green infrastructure network and integrates with wider public realm in the city; and
- xii. to ensure sustainability principles are embedded at all stages of the development.

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| <p>The SPD will establish a co-ordinated planning approach to ensure delivery of high quality sustainable development in a complementary manner. The SPD will provide the planning framework, outlining the principles for development with associated statements, which will set out the requirements to be sought. It will also outline infrastructure, facilities and services to meet the needs of the new development.</p> | | | |
| | <p>Headline objective: Reduction of York's Ecological Footprint</p> | I | <p>The York Central site aims to deliver a comprehensive urban development which embeds strong sustainability principles throughout. The success of meeting this headline indicator will be through how the development incorporates measures into each aspect of the site. The provision of office space, housing, retail and possible leisure facilities will need to minimise and mitigate any impacts they might have in terms of construction and occupation. This includes:</p> <ul style="list-style-type: none"> • implementing and adhering to sustainable design and construction techniques and standards such as the current BRE AAM and Code for Sustainable Homes, • Energy efficiency through minimising energy consumption as well as implementing renewable energy technologies, • minimising waste and treating commercial and domestic waste according to the waste hierarchy, • sustainable transport networks servicing the site to maximise cycling, walking and public transport use; and • implementation of green infrastructure to provide access to openspace, the natural environment as well as leisure and recreational opportunities. <p>Whilst the policy does not give too much detail on this, the Supplementary Planning Document to be produced should. This policy sets up the intention for this site to be developed in conjunction with Eco Town principles which is positive for this objective, although the SA questions what is meant by "within the context of its brownfield location".</p> |
| EC1 | <p>Good quality employment opportunities for all</p> | +/I | <p>This policy offers the potential for new office, retail and leisure/tourism facilities. These will all offer a degree of employment opportunities in a range of occupations helping to provide employment opportunities for all. The timescales for this will depend upon their development and occupation.</p> |
| EC2 | <p>Good education and training opportunities for all which build the skills of the population</p> | +/I | <p>There is an intention set out in the policy to provide social infrastructure including educational facilities which will be required due to the increase in population. Also, there may be training for skills associated with the office development.</p> |

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| EC3 | Conditions for business success, stable economic growth and investment | + | This site aims to be a world class urban quarter forming part of the city centre with a new central business district. The intention to supply further office development is positive for this objective in terms of providing space for business growth but furthermore, in combination with the other aspects intended on the site, it should be attractive for investment, particularly given that the policy states the offices are to be “exemplar high quality offices”. Also, the site is adjacent to the railway station which will be positive in connecting the new CBD nationally and internationally making it an attractive location in which to locate business. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | +/I | There is an intention set out in the policy to provide social infrastructure to meet the needs of the local communities including: sports, leisure, health, education and community facilities and openspace. There is also a quantity of provision for retail. In addition to this, the policy wishes to maximise connectivity and movement which is positive in terms of accessing the facilities from across the site and surrounding areas. All of this is positively working towards this objective. |
| S1 | Enhance access to York’s urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | +/I | Success in meeting this objective will be dependent upon the implementation of several key aspects of this development. This includes: sustainable transport and connectivity, social infrastructure and the green infrastructure network. The policy includes a particular reference to open space, high quality public realm and supporting social infrastructure, all of which is important for achieving this objective. The SA welcomes that development on the site is to be delivered in context with the Green Infrastructure framework and that this must relate to existing and newly built public realm. The SA welcomes that, openspace, public realm and green infrastructure which maximises linkages is important for the development is set out within the development principles and reinforces that this should be set out in a comprehensive and complementary manner in the SPD. Consideration for how these areas could incorporate the natural environment and link to biodiversity should also be considered. |
| S2 | Maintain or reduce York’s existing noise levels | ? | The development of this site will have inevitable noise issues in the short-term through development. The mix of uses on site will mean that different areas may be more susceptible to noise than others. It will be particularly important that residential properties are screened from adverse noise from new uses on the site, but also from the existing rail track. These need to be vital consideration in the masterplanning process and development of the SPD. |
| S3 | Improve the health and well being of the York population | O | There is no direct link between this policy and the objective |
| S4 | Safety and security for people and | I | Safety should be a consideration in the SPD and masterplanning stages of this site. |

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| S5 | Vibrant communities that participate in decision-making | +/I | The development of this site will, in effect, create a new community. In order for that community to function sustainability and participate together in activities there needs to be places where people can interact socially. The policy outlines that social infrastructure will be provided in terms of community and leisure facilities as well as through openspace, which is positive for this objective. The consultation process in developing the SPD and masterplan will also provide opportunities pre-development of the site to take place. |
| S6 | Reduce the need to travel by private car | +/I | The site wants to prioritise sustainable modes of transport on site as well as sustainable travel in general. In conjunction with the green infrastructure policy, this should maximise connectivity and linkages into, across and out of the site in a sustainable manner and discourage the use of the car. The railway station is also located adjacent to the site which is positive for businesses and retail which may be located there so that people can access the site using existing alternative mode. The SA supports the long-term aspiration to provide a transport interchange at the station which reinforces this objective. In addition to this, the potential for a tram-train is also highlighted in the justification for the policy. This will be positive in encouraging people to access to the city centre via frequent sustainable means. Should this be taken forward, a planned route which is accessible to the majority of people will need to be established and a link made to the proposed park and ride site set out in the Transport policy to maximise the reduction of car trips as well as to the interchange at the station. The city centre is also within close proximity and the development of the site should make sure that there are strengthened links between the two to minimise any vehicle travel between the two locations. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | +/I | This site wants to prioritise sustainable travel on site. Although the modes are not set out, the SA would expect this issue to be picked up in more detail through the SPD. What the policy does refer to is Green Infrastructure maximising linkages which is positive for both cycling and walking and that sustainable forms of travel will be prioritised. |
| S8 | A transport network that integrates all modes for effective non-car based movements | +/I | This site wants to prioritise sustainable travel on site and minimisation car trips. The long-term strategy for the tram-train should help to progress this by providing a frequent link between York Central and the British sugar/ former manor school strategic allocation. Should this be taken forward, a planned route which is accessible to the majority of people will need to be established and a link made to the proposed park and ride site set out in the Transport policy to maximise the reduction of car trips. The tram-train should also feed into any proposed |

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| | | | transport interchange points to be designed in n the site. . Although the modes are not set out, the SA would expect this issue to be picked up in more detail through the SPD. What the policy does refer to is Green Infrastructure maximising linkages which is positive for both cycling and walking and that sustainable forms of travel will be prioritised. The justification to the policy clarifies that the York Northwest development must be served by sustainable transport modes and take advantage of opportunities associated with its location, including: pedestrians, cycle, P&R, tram train, rail and bus services as well as a potential interchange at the railway station. The SA welcomes this section in the justification, which supports the wider transport objectives for an integrated sustainable transport system. |
| S9 | Quality affordable housing available for all | +/l | This site is a key driver in delivering strategic housing in York and aims to deliver around 1165 dwellings. In order for the housing development to maximise the potential for meeting this objective overall, the residential element York Central will need to be successfully implemented. The SPD will need to take account of up-to-date evidence base regarding housing mix and tenure requirements for the authority as well as the affordable housing policy set out in the Core Strategy to deliver suitable housing for all. |
| S10 | Social inclusion and equity across all sectors | l | The aim of the policy is to provide a mixed use development which form a new piece of the city and create a sustainable, vibrant residential community. It is anticipated that this will help the achievement of this objective but will need to be fully addressed as part o the SPD. |
| EN1 | Land use efficiency that maximises the use of brownfield land | ++ | This development will directly meet this objective as it is a large brownfield development site. The SA anticipates that there will be competing demands for different uses and their locations on site but the SPD will need to take a balanced approach to maximise the potential from the land in this particular location. The SA considers that the site will need to complement uses within the city centre in order to be successful and will strengthen investment potential within York. |

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| 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/? | The impact of the development on this objective will depend upon the quality of the development, its scale, design, construction and operation. Part of its success will also be how it complements and links to the city centre. It is difficult to analysis the overall impact at this time given the lack of detail. However, one of the principles of development is to “create a distinctive new place of outstanding quality and design which complements and enhances the existing historic urban fabric of the city”, which is positive for this objective. Furthermore, the policy states that any additional retail development on site will be subject to detailed impact testing showing no adverse impact on the city centre. This is positive in maintaining the character and function of the city centre helping to meet this objective. Further information has been included within the Heritage Impact Assessment accompanying the Core Strategy. The SPD will also be subject to a separate and comprehensive sustainability assessment. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | I | The focus of this site in providing a strategic level of different uses will be positive in limiting the development of other locations which may have biodiversity value. Any biodiversity value on site needs to be conserved however. There is the potential for a positive contribution from this site to this objective through the implementation of green infrastructure. These networks can act as wildlife corridors and increase habitat creation in new green spaces. This will depend upon implementation. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | I | The aim of the site to adhere to eco-town principles should include sustainable measures which will all aim to meet this objective. The justification for this policy wants principles set out on the site to be a catalyst for sustainable living which should only be positive for this objective. More detail is required however and should analysed through the SA for the SPD. |
| EN5 | Improve air quality in York | I | Although air quality is not referred specifically, there is an opportunity for this site become a n exemplar low emission site incorporating specific measures to improve poor air quality. The SA suggests that this is included within the SPD and that it adheres to the Air quality policy set out in the Core Strategy, including the LES. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | I | As this site is being promoted as embedding sustainable principles, the SA anticipates that measures to be prudent and efficient the resources will be included. This needs to be comprehensively set out in the SPD. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | I | Consideration for waste processing on site should follow the waste hierarchy in accordance with the Core Strategy policy. The SPD should set out its requirements for the site however to process waste in s sustainable through all stages of the sites development and occupation. |

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| EN8 | Maintain and improve water quality | I | All strategic development should take consideration of water as a resource. The SA would suggest that a water management strategy be included alongside the planning process for the York Northwest developments. |
| EN9 | Reduce the impact of flooding to people and property in York. | I | Flooding is major consideration for York and this site will need to implement a comprehensive approach to minimising and mitigating any potential adverse effects to flood risk. At the scale of individual buildings, the priority should be to allow water to percolate naturally into the soil and groundwater. Different methods could be used for this such as green infrastructure and construction materials. Buildings could also incorporate green roofs, grey water systems and SuDs to maximise the potential to minimise flood risk. More detailed ways for mitigation should be outlined in the SPD and will be subject to further SA analysis. |

Policy CS4: Former British Sugar/Manor School Strategic Allocation

The Council will seek to bring forward the redevelopment of the former British Sugar and Manor School sites to provide a new sustainable and inclusive residential community centred around a new neighbourhood Local Centre, which will cater for arising local needs and provide a community focus.

The former British Sugar/Manor school site will provide:

- Residential development: around 1,295 units;
- Open Space; and
- A local centre/community hub incorporating health, education, leisure and community facilities to meet local needs and 1,000 to 1,500 sqm gross floorspace for retail, services and food and drink uses, including local convenience retail of between 200 and 600 sq m gross, subject to a retail impact assessment.

The site is being promoted within the Leeds City Region as an Urban Eco-Settlement, with sustainable living as the core concept in the creation of the new development. Development will seek to deliver PPS1 standards for Eco Towns within the context of its brownfield location.

Development within the former British Sugar/Manor school site will be permitted in accordance with the principles of development set out below to be defined further through the preparation of a Supplementary Planning Document produced with the involvement of stakeholders and the community.

The principles of development are:

- to create a sustainable, balanced community through provision of an appropriate range of housing;
- to ensure that social infrastructure requirements of the new community are met through provision of facilities and services in a planned and phased manner which compliments and integrates with existing facilities;
- to maximise the benefits of sustainable economic growth for the local community;
- to ensure the highest standards of sustainability are embedded at all stages of the development;
- to create a high quality, locally distinctive place which relates well to the surrounding area;
- to create a people friendly environment which promotes opportunities for social and community interaction;
- 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;
- to maximise integration, connectivity and accessibility to and from the site giving priority to sustainable travel in line with the hierarchy of users set out in LTP2 and the emerging LTP3;
- 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; and
- 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.

The Council will prepare a Supplementary Planning Document (SPD), which will establish a co-ordinated planning approach to ensure delivery of high quality sustainable development in a complementary manner. The SPD will provide the planning framework, outlining the principles for development with associated policy statements, which will set out the requirements to be sought. It will also identify infrastructure, facilities and services to meet needs associated with the new development.

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| | <p>Headline objective: Reduction of York’s Ecological Footprint</p> | <p>I</p> | <p>The British Sugar site aims to deliver a new sustainable and inclusive residential community centred. The premise for the site will be around providing local centre providing local amenity. The success to which this new development will impact on this objective will be seen through the implementation if different measures to include:</p> <ul style="list-style-type: none"> • implementing and adhering to sustainable design and construction techniques and standards such as the current BREAAAM and Code for Sustainable Homes, • Energy efficiency through minimising energy consumption as well as implementing renewable energy technologies, |
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| | | | <ul style="list-style-type: none"> • minimising waste and treating commercial and domestic waste according to the waste hierarchy, • sustainable transport networks servicing the site to maximise cycling, walking and public transport use; and • implementation of green infrastructure to provide access to openspace, the natural environment as well as leisure and recreational opportunities. <p>Also, an element of this will be determined upon peoples behaviour whilst they live on site which can be influenced to living more sustainably. The justification for this policy states a key aim for this development is to contribute to reducing York's eco-footprint over time and that the SPD will set out a comprehensive plan for sustainable living. This policy sets up the intention for this site to be developed in conjunction with Eco Town principles which is positive for this objective, although the SA questions what is meant by "within the context of its brownfield location".</p> |
| EC1 | Good quality employment opportunities for all | I | This policy concentrates on the provision of a residential community but there will be some opportunities for employment within the local centre. Also the site is in close proximity to existing employment locations which may prove beneficial. |
| EC2 | Good education and training opportunities for all which build the skills of the population | +/I | There is an intention set out in the policy to provide social infrastructure which is needed and complement existing facilities in the area. Given that this site will be primarily residential, it is anticipated that education will be comprehensively considered. The justification for this policy recognises the need for this. The relocated Manor School (secondary school) is within close proximity of the site. It will be important that the capacity of existing facilities is considered as part of the development to make sure adequate educational spaces are available to all who require them. |
| EC3 | Conditions for business success, stable economic growth and investment | + | The site aims to support economic success through the development of a new community. This site is of strategic importance in providing housing for the city and therefore economic growth through the supply of a workforce. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | +/I | There is an intention set out in the policy to provide social infrastructure to meet the needs of the local communities including: sports, leisure, health, education and community facilities and openspace. There is also a quantity of provision for local retail. In addition to this, the policy wishes to maximise connectivity and movement which is positive in terms of accessing the facilities from across the site and surrounding areas. |
| S1 | Enhance access to York's urban | I | Success in meeting this objective will be dependent upon the implementation of several key |

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| | and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | | aspects of this development. This includes: sustainable transport and connectivity, social infrastructure and the green infrastructure network. It is recognised that openspace and green infrastructure which maximises linkages is important for the development and should be set out in a complementary manner in the SPD. Consideration for how these areas could incorporate the natural environment and link to biodiversity should also be considered. |
| S2 | Maintain or reduce York's existing noise levels | ? | The development of this site will have inevitable noise issues in the short-term through development. The mix of uses on site will mean that different areas may be more susceptible to noise than others. It will be particularly important that residential properties are screened from adverse noise from new uses on the site, but also from any existing adjacent uses such as the industrial site. These need to be vital consideration in the masterplanning process and development of the SPD. |
| S3 | Improve the health and well being of the York population | O | There is no direct link between this policy and the objective |
| S4 | Safety and security for people and property | I | Safety should be a consideration in the SPD and masterplanning stages of this site. |
| S5 | Vibrant communities that participate in decision-making | +/I | The development of this site will create a new community. In order for that community to function sustainability and participate together in activities there needs to be places where people can interact socially. The policy outlines that social infrastructure will be provided in terms of community and leisure facilities as well as through openspace, which is positive for this objective. The consultation process in developing the SPD and masterplan will also provide opportunities pre-development of the site to take place. |
| S6 | Reduce the need to travel by private car | +/I | The site wants to prioritise sustainable modes of transport on site as well as sustainable travel in general. In conjunction with the green infrastructure policy, this should maximise connectivity and linkages into, across and out of the site in a sustainable manner and discourage the use of the car. The site is in close proximity to the ring-road and will have access b road. The site will need to make sure that alternative modes of transport are implemented alongside any development to make sure that they are available to use from the outset of people living there. The policy states that it wishes to promote and facilitate a modal shift away from the use of the car which directly meets this objective. |
| S7 | Development which provide good access to and encourage use of public transport, walking and | +/I | This site wants to prioritise sustainable travel on site. The policy want to encourage a modal shift to sustainable forms of transport on site and facilitate a shift away from the use of the car. The policy also refers to Green Infrastructure maximising linkages which is positive for |

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| | cycling | | both cycling and walking and that sustainable forms of travel will be prioritised. Overall it is anticipated that this should be positive in meeting the objective, subject to implementation and the SPD/masterplanning process. |
| S8 | A transport network that integrates all modes for effective non-car based movements | +/l | The policy want to ensure as many trips as possible are taken via sustainable transport modes to facilitate a modal shift away from the use of the car towards walking, cycling and public transport use. The long-term strategy for the tram-train should help to progress this by providing a frequent link between the city centre / York Central and the British sugar/ former manor school strategic allocation. Should this be taken forward, a planned route which is accessible to the majority of people will need to be established and a link made to the proposed park and ride site set out in the Transport policy to maximise the reduction of car trips. The tram-train should also feed into any proposed transport interchange points to be designed in n the site. This policy should help to create and extend the current transport network for non car based modes and prove positive towards this objective, subject to implementation. |
| S9 | Quality affordable housing available for all | +/l | This site is a key driver in delivering strategic housing in York and aims to deliver around 1295 dwellings. In order for the housing development to maximise the potential for meeting this objective overall, this new residential development will need to be successfully implemented. The SPD will need to take account of up-to-date evidence base regarding housing mix and tenure requirements for the authority as well as the affordable housing policy set out in the Core Strategy to deliver suitable housing for all. Justification for this policy aims to take consideration for the SHMA to concentrate and mostly concentrate family housing on the site to make a significant contributing to the city's housing needs. |
| S10 | Social inclusion and equity across all sectors | +/l | The aim of the policy is to provide an inclusive sustainable residential community. It is anticipated that this will help the achievement of this objective and should be fully addressed in more detail as part o the SPD. |
| EN1 | Land use efficiency that maximises the use of brownfield land | ++ | This development will directly meet this objective as it is a large brownfield development site. The SA anticipates that there will be competing demands for different uses and their locations on site but the SPD will need to take a balanced approach to maximise the potential from the land in this particular location. The SA supports using this site predominantly for a residential community. |

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| 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 | l | The impact of the development on this objective will depend upon the quality of the development, its scale, design, construction and operation. Part of its success will also be how it complements and links to the city as a whole. It is difficult to analyse the overall impact at this time given the lack of detail. However, one of the principles of development is to “create a high quality distinctive place which relates well to the surrounding area”. Whilst this is positive, the SA considers that wording could be amended to be stronger in relation to how this will effect the character and setting of the city overall rather than just the “surrounding area”. Further information has been included within the Heritage Impact Assessment accompanying the Core Strategy. The SPD will also be subject to a separate and comprehensive sustainability assessment. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | l | Any biodiversity value on site needs to be conserved however, such as the identified bee bank and sufficient land allowed for the maintenance of the integrity of the biodiversity. There is the potential for a positive contribution from this site to this objective through the implementation of green infrastructure. These networks can act as wildlife corridors and increase habitat creation in new green spaces. This will depend upon implementation. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | l | The aim of the site to adhere to eco-town principles and the “highest standards of sustainability are embedded” should include sustainable measures which will all aim to meet this objective. The justification for this policy wants principles set out on the site to be a catalyst for sustainable living which should only be positive for this objective. More detail is required however and should analysed through the SA for the SPD. |
| EN5 | Improve air quality in York | i | Although air quality is not referred specifically, there is an opportunity for this site become an exemplar low emission site incorporating specific measures to improve poor air quality. The SA suggests that this is included within the SPD and that it adheres to the Air quality policy set out in the Core Strategy, including the LES. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | l | As this site is being promoted as embedding sustainable principles, the SA anticipates that measures to be prudent and efficient the resources will be included. This needs to be comprehensively set out in the SPD. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | | Consideration for waste processing on site should follow the waste hierarchy in accordance with the Core Strategy policy. The SPD should set out its requirements for the site however to process waste in s sustainable through all stages of the sites development and occupation. |

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| EN8 | Maintain and improve water quality | I | All strategic development should take consideration of water as a resource. The SA would suggest that a water management strategy be included alongside the planning process for the York Northwest developments. |
| EN9 | Reduce the impact of flooding to people and property in York. | | Flooding is major consideration for York and this site will need to implement a comprehensive approach to minimising and mitigating any potential adverse effects to flood risk. At the scale of individual buildings, the priority should be to allow water to percolate naturally into the soil and groundwater. Different methods could be used for this such as green infrastructure and construction materials. Buildings could also incorporate green roofs, grey water systems and SuDs to maximise the potential to minimise flood risk. More detailed ways for mitigation should be outlined in the SPD and will be subject to further SA analysis. |

Policy CS5: Urban Design and the Historic Environment

The following assets have been identified as being of strategic importance to the special character and setting of York, those elements which contribute to their significance will be conserved in perpetuity:

- the City's strong urban grain, townscape, layout of streets and squares, building plots, snickleways, arterial routes, and parks and gardens;
- the City's compactness;
- the City's landmark monuments, in particular the City Walls and Bars, the Minster, churches, Guildhalls, Clifford's Tower and the main railway station. The legacy of factories, housing, buildings, structures and spaces associated with the City's railway and chocolate manufacturing heritage;
- the City's architectural character and craftsmanship;
- the City's archaeological complexity: the extensive and internationally important archaeological deposits beneath the City. Where development is permitted, the potential to utilise this resource for socio-economic and educational purposes for the benefit of both York's communities and those of the wider archaeological sector will be explored; and
- the City's setting within its rural hinterland and the open green strays and river corridors and lngs, which penetrate into the heart of the urban area.

The Council appreciates the outstanding quality of the historic and built environment, its inherent value to the City, and the central role it plays in York's success. The LDF will promote understanding and appreciation of this important asset. Priorities for the LDF will include the adoption of a Heritage Strategy, preparation of a Conservation Area Character Appraisal for the Central Historic Core, heritage statements for key strategic sites and an assessment of key views. The Council will also support the production of Conservation Area Character Appraisals, York's Local List,

Parish Plans, Village Design Statements and Conservation Management Plans for important heritage assets, to ensure that future development is based on a thorough understanding of local character and context. To help achieve this, the Council will work with local communities to identify those aspects of the historic environment which they consider to be important to the character of their locality and help them to secure their protection and enhancement. Where appropriate, these studies will be adopted as SPDs. Such guidance will be used to inform the allocation of sites and in assessing proposals for development.

Applications for development should clearly describe the significance of heritage assets likely to be affected by development. The Council will work with developers, landowners and investors to raise awareness of the opportunities and potential for York's special character to shape development proposals. With reference to the current or emerging contextual guidance, as above, development proposals will be supported where they are designed to:

- i. conserve those elements and settings which contribute to York's historic and architectural environment, including nationally and locally designated sites, buildings and other heritage assets, their features, character, flora and fauna. New development should avoid damage to archaeological deposits wherever possible and put in place appropriate mitigation measures where damage is unavoidable;
- ii. encourage a strong sense of place through maintaining and enhancing local townscape and landscape character, river corridors and becks, street patterns and frontages (in particular York city centre's medieval street patterns, urban spaces, burgage plots and snickleways). Development should respect local form, scale and density, address the need to reduce CO₂ emissions and York's ecofootprint in a sympathetic way, and promote high quality standards of contemporary design in buildings and the spaces between them in response to the outstanding value of the existing townscape, in terms of:
 - a) urban grain, with respect to the arrangement of street blocks, plots and buildings in determining the texture of the city;
 - b) urban structure, and the framework of routes and spaces connecting locally and more widely;
 - c) the character and appearance of landscape, city parks, landforms, open space, planting boundaries and treatment;
 - d) density and mix, allowing for the provision of appropriate on-site amenity space;
 - e) scale, in relation to its surroundings, views, vistas and skylines, in particular the prominence of York Minster both from within the city and in longer distance views across the open countryside;
 - f) massing in relation to other buildings and spaces, particularly buildings of architectural or historic significance; and
 - g) the texture, colour, pattern and durability of materials, and techniques and elements of detailing used.
- iii. allow inclusive access and movement for pedestrians and cyclists, and promote public spaces and routes that are attractive, safe, uncluttered and easy to move through for all; and
- iii. improve the quality of the public realm and environment presenting positive first impressions to those arriving in, exploring or passing through

| York. | | | |
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| | Headline objective: Reduction of York's Ecological Footprint | I | There is a strong link between urban design and achieving a reduction in York's Ecological Footprint. The elements that this policy concentrate on are with regards to the historic environment and urban form which afford York its special character. Factors linked to the achievement of this objective are within Section 18: Sustainable Design and Construction (policy CS21) of which there is a link in the justification part of the policy. |
| EC1 | Good quality employment opportunities for all | + | Comments as per the Preferred Options analysis which states that there is no direct link between the policy and the objective. However, the historic environment is a strong driver for tourism and the economy which is at the heart of this objective. This policy should therefore have a positive contribution to this objective in terms of providing an attractive setting within which business can operate. |
| EC2 | Good education and training opportunities for all which build the skills of the population | O | Comments stand as per the Preferred Options analysis which identified that there is no direct link between this policy and the objective. However, It also identified that the historic attributes of the city support specialist skills. |
| EC3 | Conditions for business success, stable economic growth and investment | ++ | Comments stand as per the Preferred Options analysis which stated that policy directly meets the objectives. The historic environment is a key driver for the economy in terms of underpinning tourism, one of the city's main industries. The heritage assets presented within the city centre are a particular pull for tourists and visitors and form the main hub for the industry. One of the design considerations for development proposals is to "improve the quality of the public realm and environment presenting positive first impressions to those arriving in, exploring or through York". This positive first impression is key to tourism and in attracting visitors back time after time. The aim of the policy is actually "to continue to protect, preserve and enhance York's exceptional legacy, including its architecture and archaeology, significant views, landscape setting and the distinctive characteristics of York's villages and neighbourhoods". Consequently, the conditions for economic success, growth and investment will continue into the future by a continuing effort to cherish and enhance the historic features that York has to offer. Further to this, the SA supports the requirement for the completion of Conservation Area Appraisals for the Central Historic Core, heritage statements for key strategic sites and an assessment of key views as well as Heritage Assessment for all key planning documents within the umbrella of the LDF, and all submitted development proposals, relative to the scale of development. The completion and requirement for these documents |

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| | | | will help to monitor and maintain the impact of change city's heritage assets, which is suitable under the requirements of this policy. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | I | Comments stand as per the Preferred Options analysis which identified that there is no direct link between this policy and the objective. However, as the historic character of the city is key to tourism, this will indirectly support local jobs associated with the industry. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | + | Comments stand as per the Preferred Options analysis which identified that this policy will help to achieve this objective as the policy actively aims to preserve and enhance the city's townscape and landscape character which includes the city's strong urban grain, street layout, building plots, snickleways and arterial routes. The policy includes for allowing inclusive access and movements for pedestrians and cyclists and promoting public spaces and routes is an important element of development proposals. This all aids accessibility into, around and out of the city. In addition to this, the policy aims to conserve the landscape character of York which includes a remit for the natural environment. In particular this relates to the policy's identification of "the city's setting within its rural hinterland and with the green strays penetrating the urban area". Further to this, the policy states that development proposals must consider the landscape, landforms, openspace, planting boundaries and treatment within any development proposals. All of these aspects have to be successful in adhering to the policy and will have a consequential positive effect on this objective. |
| S2 | Maintain or reduce York's existing noise levels | O | Comments stand as per the Preferred Options analysis which identified that there is not a direct impact on the objective. |
| S3 | Improve the health and well being of the York population | + | Comments stand as per the Preferred Options analysis which stated that good design can positively influence this objective through ensuring people are living and working in good quality environments and conditions. |
| S4 | Safety and security for people and property | + | Comments stand as per the Preferred Options analysis which stated that design plays an important part of quality design. This policy should help to design in principles to address safety of people an property in different places and spaces. The policy states that it will promote public spaces and routes which are safe, uncluttered and easy to move around which forms a key principle of urban design. This policy should help to therefore make sure that any proposals have a positive influence safety for people and property. |
| S5 | Vibrant communities that participate in decision-making | ++ | This policy refers to the Council working with local communities to identify those aspects of the historic environment which they consider important for the character of their locality and help to secure their protection and enhancement. Further to this there is the commitment to |

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| | | | working with local groups to produce policy guidance such as Parish Plans and Village design statements. In light of this, it can be deemed to have a positive influence on this objective. |
| S6 | Reduce the need to travel by private car | + | This policy sets out that inclusive access and movement for pedestrians and cyclists is a key design requirement for development proposals. In addition to this the whole policy promotes enhanced access reinforcing the city's network of streets and spaces. This will obviously have a positive impact on this objective as people will be encouraged to use the enhanced routes, particularly for moving through and around the City centre, rather than use their car. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | + | This policy sets out that inclusive access and movement for pedestrians and cyclists is a key design requirement for development proposals. In addition to this the whole policy promotes enhanced access reinforcing the city's network of streets and spaces. This will obviously have a positive impact on this objective as people will be encouraged to use the enhanced routes, particularly for moving through and around the City centre, rather than use their car. |
| S8 | A transport network that integrates all modes for effective non-car based movements | +/I | The policy is supportive of this objective through its acknowledgement for the historic street patterns, public realm and urban structure which help to link together routes and networks for pedestrians and cyclists. Respect for this in the long term should to enhance the achievement of this objective depending on how it is implemented. |
| S9 | Quality affordable housing available for all | O | Comments stand as per the Preferred Options analysis which found there was no clear link between this policy and the objective. However, the implementation of this policy in conjunction with policy CS21 regarding sustainable design and construction, should help to develop decent and quality homes which reflect the character of York well. |
| S10 | Social inclusion and equity across all sectors | + | This policy should work well in achieving this objective. Not only does it promote working with communities to determine how important different aspects of the historic character are, the policy aims to enhance and maintain inclusive access and movement and space which are easy to move through for all. |
| EN1 | Land use efficiency that maximises the use of brownfield land | I | There is no direct link to this policy. However, implementing design which complements, reflects and enhances the historic and built environment of York will maximise the use of space efficiently. |

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| 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 principle role of this policy is to achieve what is set out by this objective and the SA welcomes all aspects of the policy. The policy is comprehensive in describing more precisely the important characteristics and settings of the city which make it unique and afford it a special sense of place. By the policy setting these factors out up front it sets the context for why the city's heritage is of up-most importance and what the key themes are that will need to be considered through any development proposal. The SA welcomes the approach to set out clearly the requirements for developers, landowners and investors in terms of key urban design principles and characteristics to be considered in the context of the historic environment as it will enable better quality design. Masterplanning will maximise the preservation of existing assets but also enable a contribution from the development to the city overall. The city's characteristics, which are listed in the policy will form part of Heritage Assessments for all development proposals and to influence spatial policy and guidance. It also sets a common baseline which can be added to for other documents set out in the policy such as the Conservation Area Character Appraisal for the Central Historic Core, Parish Plans, Village Design Statements and Assessments of Key Views. The SA welcomes this approach as it will induce consistency across assessments and appraisals in plans and development proposals in the future. The SA interprets this as a positive way to carefully guide new development. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | + | The policy aims to conserve the landscape character of York which includes a remit for the natural environment. In particular this relates to the policy's identification of "the city's setting within its rural hinterland and with the green strays penetrating the urban area". Further to this, the policy states that development proposals must consider the landscape, landforms, openspace, planting boundaries and treatment within any development proposals. All of these aspects have to be successful in adhering to the policy and will have a consequential positive effect on this objective. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | + | Comments stand as per the Preferred Options policy analysis. This stated that the policy has an indirect positive contribution for this objective in that the whole historic environment is a carbon sink as the carbon has been locked into the existing built structures. Conservation, maintenance and enhancement to the existing stock of buildings (particularly in relation to energy efficiency) will mean that additional carbon is not released. In addition to this, the policy promotes high standards of quality contemporary design and that the texture, durability of materials and techniques used should promote the outstanding value of York's townscape. |

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| | | | This links to policy CS21 regarding Sustainable Design and Construction, which is an important crossover with this policy. Putting into practice a combination of these design policies will require a balance to be achieved between design which incorporates sustainable techniques but also complements the existing historic city. This policy states that “Development should respect local form, scale and density, address the need to reduce CO ₂ emissions and York’s ecofootprint in a sympathetic way and promote high quality design standards of contemporary design in buildings and the spaces between them”. There is the potential for conflict here but the resolution to this should be through quality design and the ability to be able to manage, adapt and mitigate the effects of development and the historic environment on climate change as much as climate change on development and the historic environment. |
| EN5 | Improve air quality in York | I | Comments stand as per the Preferred Options policy analysis which stated that there is no direct link between this policy and the objective. However, there should be some positive outcomes indirectly from the promotion of accessibility and connectivity for pedestrians and cyclists, which will help to minimise vehicle emissions, particularly in the city centre, positive for this objective. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | O | Comments stand as per the Preferred Options policy analysis which stated that there is no direct link between this policy and the objective. This aspect of design is covered by Policy CS21. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | O | Comments stand as per the Preferred Options policy analysis which stated that there is no direct link between this policy and the objective. |
| EN8 | Maintain and improve water quality | I | The policy does include the river corridors as part of design consideration in this policy. This may help towards this objective depending upon implementation of the policy. |
| EN9 | Reduce the impact of flooding to people and property in York. | I | Comments stand as per the Preferred Options policy analysis which stated that there is no direct link between this policy and the objective. However, flooding will be an important consideration for the historic environment in the future as it is likely to increase in line with climate change although flood zone 3b is used as a primary constraint for development. Design will be an important way to make sure that development does not put the historic environment under more threat but helps it adapt and mitigate the effects of flooding on the landscape and urban environment. |

Policy CS6: The Scale and Distribution of New Housing

Policy CS6: The Scale and Distribution of New Housing

The Local Development Framework (LDF) will make provision for at least 16,000 dwellings in the City of York between 2011 and 2031, directed by Spatial Principles 1, 2 and 3. Provision to meet this requirement will be made as follows:

1. Identified Supply

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| - Sites with planning permission or part completed | 3,967 dwellings |
| - Former British Sugar/Manor School Strategic Allocation | 1,291 dwellings |
| - York Central Strategic Allocation | 1,165 dwellings |
| - Sites within the City Centre Area Action Plan | 430 dwellings |
| - Estimated completions on presently unidentified 'windfall' sites (less than 0.2 ha) | 3,108 dwellings |
| - Potential sites identified through the Strategic Housing Land Availability Assessment (SHLAA) | 2,306 dwellings |

Within the supply identified above the Major Development Opportunities highlighted on the Key Diagram make the following contribution to the overall supply:

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| - Hungate* | 557 dwellings |
| - Nestle South* | 315 dwellings |
| - Terry's* | 395 dwellings |
| - Germany Beck* | 700 dwellings |
| - Metcalfe Lane* | 538 dwellings |
| (*Sites with planning consent) | |

Housing allocations and windfalls will be assessed in accordance with Spatial Principles 1, 2 and 3. Sites should be in accessible locations and respect residential amenity.

2. Future Areas of Search for Urban Extensions

In accordance with the sequential approach set out in Spatial Principle 3, areas A1, A2 and B (shown on the key diagram) will be brought forward to meet future housing need if they are required to maintain a 10 year supply of developable sites.

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| | Headline objective: Reduction of York's Ecological Footprint | I | The comments stand as per the Preferred Options stages regarding the inevitability that development in York will affect the ecological and carbon footprint of the city. Increasing population will have a particular effect on consumption of resources, goods and services. The revised policy however is more specific about the strategic sites which are to be developed and the proportions which make up the housing trajectory. The policy aims to develop mostly sites which are identified and only allow for windfall developments below a threshold. The policy mostly identifies brownfield sites for housing. Developing the major development sites, which are mainly within the urban area, will help to reduce the amount of greenfield land developed in the future and will help to located development in close proximity to other developments. It is paramount that the cumulative effects of windfalls developments is considered to make sure adequate measures are taken for limiting adverse environmental effects. |
| EC1 | Good quality employment opportunities for all | I/+ | Comments stand as per the Preferred Options which stated that there is no direct link with this policy but in the development and construction stages, jobs will be sustained. |
| EC2 | Good education and training opportunities for all which build the skills of the population | O | Comments stand as per the preferred Option which stated that there was no direct link between this policy and the objective. |
| EC3 | Conditions for business success, stable economic growth and investment | +/I | Comments stand as per the Preferred Options stage. Provision of quality homes is needed in order to provide for the workforce in the city. The amount of homes is approximately in line with the identified need in the future from the evidence base and is an important element in supporting economic growth in the city. Developing sites primarily in the sub-regional centre should ensure people have good access around the city for commuting and the movement of goods, which again should be positive for this objective. In turn this will also enhance the needs for services and facilities and stimulate the retail and leisure economies. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | I | Comments stand as per the Preferred Options stage, which stated that housing mix policy does not directly deliver new services but can influence their location if they are required by an increasing population. The SA welcomes the cross reference to Spatial Principle 1, 2 and 3 with regards to determining housing allocations and windfalls as these expand the requirements for development to be accessible both in terms of public transport and local services and facilities. Development of sites within the urban area should help to maximise the use of existing facilities and keep them viable. However, ongoing development will need to make sure that services in the local vicinity are adequate for the increase in properties. |

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| | | | This will be especially relevant to large development site such as York Northwest and the strategic sites set out in the policy. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | l/+ | The intention to develop primarily brownfield sites, as per those set out in this policy will limit the overall take up of greenfield land. The spatial strategy also prioritises brownfield over greenfield sites although there are areas of search for urban extensions which could be developed subject to the need to keep a 10 year supply of housing throughout the lifetime of the plan. . The SA recognises that new housing development will require additional facilities such as various types of openspace and essential services. Should these urban extensions take place they will be accompanied by the designation of new strategic openspace which would not only serve the new communities but be beneficial for the existing adjacent communities as well. There are identified openspace deficiencies around the city which should be addressed through new development. The delivery of accessible leisure and recreational services should be in accordance with the spatial principles to ensure sufficient land is developed. |
| S2 | Maintain or reduce York's existing noise levels | l | Comments are as per the Preferred Options which stated that there may be short term adverse impacts from house building to residents in close vicinity of the new developments. The length of time this will impact will depend upon phasing of the sites. |
| S3 | Improve the health and well being of the York population | + | Comments are as per the Preferred Options which stated that the provision of quality homes will support healthy living standards and help provide a sense of well-being. |
| S4 | Safety and security for people and property | l | Comments are as per the Preferred Options which stated that design and construction standards should help to provide secure living environments. |
| S5 | Vibrant communities that participate in decision-making | l | Comments are as per the Preferred Options which stated that developing a sustainable community should be at the heart of housing development. This is particularly important for the large strategic sites and therefore housing should be accompanied by community and recreational facilities. Furthermore, any housing development should ensure that it integrates in the community which would be beneficial for both new and existing residents. |
| S6 | Reduce the need to travel by private car | l | Comments are as per the Preferred Options SA. In addition to this the SA welcomes that the policy specifically cross references the Spatial Principles, which refer to constraints and location principles as well as stating accessible locations which aim to minimise the additional number of car trips made. |
| S7 | Development which provide good access to and encourage use of | +/l | Comments are as per the Preferred Options SA which identified that the spatial strategy will help in directing development to the urban area. This will make use of existing transport |

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| | public transport, walking and cycling | | routes and services as well as enhanced footpaths and cycle routes as per the Green Infrastructure and Transport policies set out in the document. In addition to this the SA welcomes that the policy specifically cross references the Spatial Principles, which refer to constraints and location principles as well as stating accessible locations as a key consideration. This will be important when considering permission for windfall sites and any other housing allocations. How well this policy meets the objective therefore, will depend upon implementation. |
| S8 | A transport network that integrates all modes for effective non-car based movements | I | An integrated transport strategy will be important in linking together housing developments. The SA welcomes that this policy references accessible locations and suggests that there are strong links made to the transport policy. |
| S9 | Quality affordable housing available for all | ++ | This policy sets out the trajectory for housing growth over the lifetime of the plan as well as the quantities to be provided from strategic sites. The baseline and evidence base states that both market and affordable housing is required in York to accommodate population growth and to offset the current shortage of affordable dwellings. This policy goes some way to meeting objective S9 in terms of housing provision and in conjunction with Policy CS7, will develop sites for different household types as per the justification to the policy. This policy sets out the trajectory for housing growth over the lifetime of the plan as well as the quantities to be provided from strategic sites. The baseline and evidence base states that both market and affordable housing is required in York to accommodate population growth and to offset the current shortage of affordable dwellings. This policy goes some way to meeting objective S9 in terms of housing provision and in conjunction with Policy CS7, will develop sites for different household types as per the justification to the policy. The SA acknowledges that the high population growth outlined in the current evidence base will increase housing need in the future. The aim to deliver an average of 635 dwellings between 2011/12 and 2015/16 is a reflection of the current market but the policy takes a positive view and increases this target this to an average of 855 dwellings per annum for the rest of the plan period. Overall this leads to an overall average across the plan period of 800 dwellings per annum. It is anticipated that this will help to deliver enough housing to meet overall demand. This has positive connections with meeting affordable housing targets also and enabling everyone who wants to live in York to have the opportunity by stabilising the York housing market demand through supply and increasing availability to all household budgets. |

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| | | <p>The SA still acknowledges the risk over the inclusion of windfalls within the housing trajectory. The trajectory relies upon nearly 15% of the total provision of housing until March 2031 on windfall development, which by definition cannot be planned for in advance. This also equates to 27% of new build development, which does not include dwellings already committed in the planning process. Whilst the SA supports the capture of such small developments, acknowledged to be an historic trend for York, this has mixed implications. The SA is cautious over relying on windfall developments as part of the trajectory as they cannot be relied upon for meeting future housing delivery. However, windfall development does meet objective EN1 given that it is brownfield development and will maximise the use of this in the future. Furthermore, it effectively pushes back the development of greenfield development until the brownfield opportunities are exhausted. By their nature, it is impossible to predict all windfalls and the SHLAA aims to identify as many brownfield opportunities as possible. However, historically windfalls under 0.2 ha and changes of use/conversions have contributed to York’s housing supply and will continue to do so based upon a 10 year trend phased in over 18 months. Including these within overall housing trajectory therefore does include some risk for planning for development but it will also ensure that the release of greenfield sites will be minimised in the future, which is positive for environmental objectives.</p> <p>Including windfall developments also has some risk for meeting Policy CS7 to achieve a balanced housing market due to their unpredictable nature and location. However, these developments will be subject to the requirements set out in the Core Strategy, including meeting a balanced housing market and with regards to the provision of affordable homes and facilities such as openspace. It will be paramount that any such development should meet the different housing needs set out by the SHMA. Should there be further demand and a lack of 10 years supply of developable sites, the policy advocates that the areas of search for urban extension will play a crucial role in delivering housing and new sustainable communities. The SA would support this approach as it offers an opportunity to deliver key housing in York in the future and the ability to create a sustainable community.</p> <p>There is also significant emphasis on the delivery of major development sites for housing, the deliverability of which cannot be guaranteed. Given these elements of uncertainty the SA welcomes the approach to use urban extensions should there be a lack of a 10 year supply of</p> |
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| | | | <p>developable sites. This should ensure that housing is continued to be built to meet the needs of York in a balanced way.</p> <p>Overall, the SA advises that the combination of these policies should help to ensure delivery of housing which not only meets the needs of the population but the needs of a everyone who may wish to live in York</p> |
| S10 | Social inclusion and equity across all sectors | +/I | <p>Comments are as per the Preferred Options SA which stated that new housing has an important role to play in equity of access to quality housing The aim to deliver an average of 635 dwellings between 2011/12 and 2015/16 is a reflection of the current market but the policy takes a positive view and increases this target this to an average of 855 dwellings per annum for the rest of the plan period. Overall this leads to an overall average across the plan period of 800 dwellings per annum. It is anticipated that this will help to deliver enough housing to meet overall demand. This has positive connections with meeting affordable housing targets also and enabling everyone who wants to live in York to have the opportunity by stabilising the York housing market demand through supply and increasing availability to all household budgets.</p> |
| EN1 | Land use efficiency that maximises the use of brownfield land | +/? | <p>This policy will meet this objective as the main strategic sites identified are brownfield sites, with the exception of Germany Beck and Metcalfe Lane. The sequential approach to development set out by the Spatial Principles in conjunction with this policy should ensure that brownfield developments occur first and form the majority of new housing development within the sub-regional centre and subsequent villages. Previous SA comments recognised that there may be conflicting issues with regards to what should be developed on sites to maximise its potential. Consideration for maximising the potential will have to take consideration of the historic character and setting, flood risk etc in order to development the site is the best and most useful way. Should there be a lack of sites to maintain a predominantly brownfield led 10 year supply of developable sites, urban extension will be considered for development. These do conflict with this objective but should provide many positive social benefits and, given how they have been determined, minimise other environmental impacts</p> |

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| 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 | ? | Comments stand as per the Preferred Options analysis. The effect that housing has on this objective will be connected to the scale, type and location of the development along with the masterplanning and use of materials. Evidence base has been use to help assess the most sustainable locations for development, of which the historic character has been a consideration. The strategic sites stated in this policy, British Sugar and York Central, are both being taken forward as Supplementary Planning Documents to provide a more detail framework for developed. More detail with regards to their development is set out within policies CS2 and CS3. Directing the majority of development to the sub-regional centre will help to conserve the current setting of the city. However, the SA has some concern with regards to windfall development changing the character of the city centre given that it is unplanned development. There may be implications for the building mass and infrastructure which need to be considered on an individual and cumulative basis when determining applications. Furthermore, the areas of search for urban extensions should also take the historic setting of York as a key consideration for development and masterplanning. Comprehensive analysis of the site should be undertaken to ensure that key views, landscaping and a synergy with York's existing traits are built into the development. There is also further analysis in the Heritage Appraisal. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ? | The revised policy references that allocated sites will have to adhere to SP1, SP2 and SP3 and will therefore need to conform to location principles. The cumulative impact of this will be that these policies will help direct development away from areas of the natural environment which is of high value. Also, the approach to develop primarily on brownfield sites within the sub-regional centre will help to meet this objective by limiting uptake of any greenfield land. Should the development of the Greenfield urban extensions occur, there will be the designation of new strategic openspace which may have the ability to incorporate or develop areas of high biodiversity value. In determining their notional boundaries, designated nature conservation sites were taken into key consideration. Furthermore, identified Natura 2000 sites have been assessed through the Habitat Regulation Assessment and have been deemed to not be adversely effected by development in these locations. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | I | Comments stand as per the Preferred Options analysis, which identified that the effects for this objective will depend upon implementation of the policy. The main reason for this are that increased housing has the potential to adversely effect this objective. In the future however it has been identified that this could be mitigated through adhering to other policies set out in |

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| | | | accordance with the Core Strategy, such as sustainable design and construction SPD. This however will only be identified later in the process of development. In addition to this, the SA recognised that it is not only the development of housing which will effect this objective but also associated activity such as travel patterns, waste production and resource consumption. In order to fully meet this objective this policy will need to make sure that these aspects are considered at every stage to minimise adverse effects. The SA welcomes that SP2 is referenced within the policy as it relates to strong constraints for the location of development, including accessibility. |
| EN5 | Improve air quality in York | I | Comments stand as per the Preferred Options analysis which stated that directing development within the sub-regional centre will help located the new housing within proximity of local transport routes. Uptake of these will help to minimise car based emissions. Given that some of the developments are located in close proximity or within the city centre, incorporation of measures to minimise all emissions so air quality does not deteriorate will need to be made. Development should therefore adhere to the Low Emissions Strategy and policy 19 regarding Air Quality. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | I | Comments stand as per the Preferred Options analysis which identified that any housing development would incur an increase in the use of resources and energy. It will be paramount that housing development incorporates sustainable design and construction policies to deliver energy and resource efficiency measures, sustainable waste processing and water management techniques. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | I | Comments stand as per the Preferred Options analysis which identified that domestic waste will need to be processed from new housing development. This will need to be in line with the Core Strategy policy on Waste. The achievement of this objective will depend upon implementation. |
| EN8 | Maintain and improve water quality | O | Comments stand as per the Preferred Options analysis which identified that there was no direct link between this objective and the policy. |
| EN9 | Reduce the impact of flooding to people and property in York. | I | There is the potential for housing development to have a potential effect on flooding within York, particularly through runoff from buildings. New development will need to implement measures in order to minimise any potential effects from flooding using sustainable materials and urban drainage appropriate. |

| Policy CS7: Balancing the Housing Market | | | |
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| <p>Proposals for residential development must respond to current evidence base, including the findings of the <i>Strategic Housing Market Assessment (2007)</i>, <i>North Yorkshire Gypsy and Traveller Accommodation Assessment (2008)</i>, <i>North Yorkshire Accommodation Requirements of Showmen (2009)</i>, and/or other local assessments of housing need. The Local Development Framework (LDF) will support housing development which helps to balance York's housing market, address local housing need, and ensure that housing is adaptable to the needs of all of York's residents throughout their lives. This will be achieved in the following way:</p> | | | |
| <ul style="list-style-type: none"> i. identifying appropriate housing sites through the Allocations DPD and Area Action Plan in accordance with Spatial Principles 1 and 2; ii. identifying sites through the Allocations DPD and Area Action Plan for at least 36 additional Gypsy and Traveller pitches in the plan period, and land to accommodate at least 13 permanent plots for Showpeople by 2019; iii. securing the provision of new specialist housing schemes within major housing developments, including to accommodate those with severe learning disabilities, physical disabilities and dementia; iv. enabling higher density development in the most accessible locations, to provide starter homes for students and young people; v. delivering an overall mix of 70% houses:30% flats. Sites required for specific housing types and site-specific mix standards will be identified through the Allocations Development Plan Document (DPD) and Area Action Plan; vi. requiring that all new housing is built to Lifetime Homes standard; and vii. controlling the concentration of Houses in Multiple Occupation, avoiding the division of small properties, where further development of this type of housing would have a detrimental impact on the balance of the community and residential amenity. | | | |
| | Headline objective: Reduction of York's Ecological Footprint | I | The comments stand as per the Preferred Options stages regarding the inevitability that development in York will affect the ecological and carbon footprint of the city. The impacts related are mainly related to housing growth and delivery. This policy includes that higher density development will be allowed subject to the site being an accessible location. This is positive for minimising the number of journeys made in cars from new sites. Please see the analysis for policy CS6 for more information. |
| EC1 | Good quality employment opportunities for all | O | There is no direct link between this policy and the objective. |
| EC2 | Good education and training opportunities for all which build the skills of the population | O | There is no direct link between this policy and the objective. Indirectly however, this policy now directly caters more for young people through the acknowledged provision of higher density sites to provide starter homes. This will help to support the basic need of accommodation for students attending the higher and further educational establishments in York and the ability to gain further skills and education in this city. |

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| EC3 | Conditions for business success, stable economic growth and investment | I | Provision of quality homes meeting the needs of the population is important in order to provide for the workforce and the young person population in the city. The impacts on this objective also relate to housing growth and delivery. Please see the analysis for policy CS6 for more information. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | O | There is no direct link between this policy and objective. The impacts on this objective also relate to housing growth and delivery. Please see the analysis for policy CS6 for more information. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | O | There is no direct link between this policy and objective. The impacts on this objective also relate to housing growth and delivery. Please see the analysis for policy CS6 for more information. |
| S2 | Maintain or reduce York's existing noise levels | -/I | Comments are as per the Preferred Options which stated that there may be short term adverse impacts from house building to residents in close vicinity of the new developments. The length of time this will impact will depend upon phasing of the sites. In addition to this the guidance for the provision of Gypsy, Traveller and Showpeople sites specifies that noise should be avoided and the impacts considered on residents' privacy and amenity. This will be determined through designation of the sites. Noise impacts are also considered through the evidence base for Student Housing and will need to be monitored in line with point (vi) of this policy. |
| S3 | Improve the health and well being of the York population | + | Comments are as per the Preferred Options which stated that the provision of quality homes meeting the needs of the population will support healthy living standards and help provide a sense of well-being. This will have a particular influence on older people and the implementation of "Lifetime Homes". |
| S4 | Safety and security for people and property | O | There is no direct link between this policy and the objective. However, there are links with design and construction standards. For more information see analysis for policy CS5. |
| S5 | Vibrant communities that participate in decision-making | I/+ | Comments are as per the Preferred Options which stated that developing a sustainable community should be at the heart of housing development. This policy will directly meet this objective by aiming to build homes which respond to people's needs and the city's need for different types of accommodation into the future. This will have a positive influence on the creation of vibrant communities but will depend upon implementation of the policy through the lifetime of the plan. |

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| S6 | Reduce the need to travel by private car | O | There is no direct link between this policy and the objective. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | O | There is no direct link between this policy and the objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | O | There is no direct link between this policy and the objective. |
| S9 | Quality affordable housing available for all | ++/I | <p>This policy sets out the Council's way to meet and deliver different types of homes for different households in York. The policy aims to address the need for family housing, as identified through the Strategic Housing Market Assessment, by implementing a 70% houses to 30% flats ratio in the policy. The SA welcome this approach to achieve the target of 70% homes to be delivered as houses by the end of the planning period in response to the evidence base which identified a need for more family accommodation. In addition to this, the policy aims to meet the housing needs of different populations wishing to live in York, such as Gypsies, Travellers and Showmen, older people, young people/students and people with disabilities. This should enable different accommodation development to satisfy the needs identified through the evidence base and enable vibrant communities to establish. The justification to the policy states an overall understanding that "all people as they grow up and leave home, as they grow old and as their circumstances, options and preferences change" need to be accommodated. The intention for higher density development in accessible locations for young people/students also sets out the Council's intention to support the growth of this group in association with the thriving further and higher educational establishments within the city. This should reduce the pressure identified on existing housing stock to provide houses of multiple occupation for people of this age into the future. Furthermore, there is an overt acknowledgement in the justification that both permanent and temporary pitches for gypsies, travellers and show people will be found to address their specific needs. The success in meeting this objective however, will be through implementation but should be positive in the long-term.</p> <p>Including windfall developments in policy CS6 has some risk for achieving a balanced</p> |

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| | | | <p>housing market due to their unpredictable nature and location. However, these developments will be subject to the requirements set out in the Core Strategy, including meeting a balanced housing market and with regards to the provision of affordable homes and facilities such as openspace. It will be paramount that any such development should meet the different housing needs set out by the SHMA. Should there be further demand and a lack of 10 years supply of developable sites, the policy advocates that the areas of search for urban extension will play a crucial role in delivering housing and new sustainable communities. The SA would support this approach as it offers an opportunity to deliver key housing in York in the future and the ability to create a sustainable community.</p> <p>There is also significant emphasis on the delivery of major development sites for housing in related Policy CS6, the deliverability of which cannot be guaranteed. Given these elements of uncertainty the SA welcomes the approach to use urban extensions should there be a lack of a 10 year supply of developable sites. This should ensure that housing is continued to be built to meet the needs of York in a balanced way.</p> <p>The policy also outline the Council's intention to specify housing sites in the Allocations document. This link to analysis on Policy CS6 which details the Council's intentions for growth.</p> |
| S10 | Social inclusion and equity across all sectors | + | This policy will allow social inclusion and equity through the delivery of different housing types to satisfy the needs of the population. This is particularly relevant to Gypsies, Travellers and Showpeople who are populations often displaced due to their lifestyle. |
| EN1 | Land use efficiency that maximises the use of brownfield land | +/I | This policy should help to maximise this objective by requiring development to provide a housing mix in line with housing need. The policy does not specify where sites for Gypsies, Travellers and Showpeople are to be located but more information is given in policy CS8 with regards to this. |
| 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 | There is no direct link between this policy and the objective. Comments with regards to actual developments and site densities are in the analyses for policies CS6 and CS9 respectively. |
| EN3 | Conserve and enhance a bio- | O | There is no direct link between this policy and the objective. |

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| | diverse, attractive and accessible natural environment | | |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development is picked by in the analysis for policy CS6. |
| EN5 | Improve air quality in York | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development is picked by in the analysis for policy CS6. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development is picked by in the analysis for policy CS6. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development is picked by in the analysis for policy CS6. |
| EN8 | Maintain and improve water quality | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development is picked by in the analysis for policy CS6. |
| EN9 | Reduce the impact of flooding to people and property in York. | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development is picked by in the analysis for policy CS6. |

Policy CS8: Sites for Gypsies, Travellers and Showpeople

The LDF will support sites for Gypsies, Travellers and Show people which:

- i. provide safe and convenient vehicular and pedestrian access to the site;
- ii. provide for adequate on-site facilities for parking, storage, play and residential amenity;
- iii. are well located on the highway network;
- iv. offer safe and convenient access to schools and local facilities;
- v. provide adequate levels of privacy and residential amenity; and
- vi. make temporary plots available within larger sites.

In addition to the above criteria, plots for Showpeople will be considered acceptable where they are designed to:

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| <p>vii. offer the potential for living and working on-site; viii. permanently house a maximum of 12 families within any one site; and ix. provide Individual plots of minimum 0.5 acre.</p> | | | |
| | Headline objective: Reduction of York's Ecological Footprint | I/? | This policy aims to provide sites which are accessible by pedestrian access. This should help to minimise the amount of local vehicular movements for services and facilities. The SA recognises that the lifestyle led by Gypsies, Travellers and Showpersons revolve around travel and therefore minimise journeys through locating the site in close proximity of the road network should make appositive contribution. This will ultimately be determined upon the identification of sites. |
| EC1 | Good quality employment opportunities for all | O | There is no direct link between this policy and the objective. |
| EC2 | Good education and training opportunities for all which build the skills of the population | O | Comments stand as per the preferred Option which stated that there was no direct link between this policy and the objective. |
| EC3 | Conditions for business success, stable economic growth and investment | O | There is no direct link between this policy and the objective. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | I | This policy wants the sites and pitches to offer safe and convenient access to schools and local facilities which is positive for this objective. This will be determined upon the designation of the sites however. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | + | Comments stand as per the Preferred options analysis. This policy aims to include play and residential amenity space for residents which is positive in achieving this objective as it will be available on site. |
| S2 | Maintain or reduce York's existing noise levels | I/+ | Comments stand as per the preferred Options analysis. The good practice guide for Designing Gypsy and Traveller sites (DCLG, 2008) specifies that noise impacts will need to be avoided and the impact should be considered on residents privacy and amenity. This will be determined upon designation of the sites but should be positive in the long-term. |
| S3 | Improve the health and well being of the York population | I | Comments stand as per the Preferred Options policy which stated that by providing better needs for this population and engendering social inclusion, healthy lifestyles will be |

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| | | | encouraged. Further to this, the provision of sites and pitches for Gypsies, Travellers and Showpeople is important for their well-being and being able to maintain their way of life. The success of meeting this objective will be determined through the delivery of the pitches and sites. |
| S4 | Safety and security for people and property | + | Comments stand as per the Preferred Options analysis which determined that this policy is aimed at contributing towards a cohesive community and reducing crime (through illegal encampments) and the fear of crime. This policy will help to achieve security of places to live for Gypsies, Travellers and Showpeople who wish to make York a temporary or permanent home. |
| S5 | Vibrant communities that participate in decision-making | l/+ | Comments stand as per the Preferred Options analysis which recognised that this policy will help to redress inequalities that these groups currently face. The provision of pitches for Gypsies, Travellers and Showpeople will be positive in providing space for their communities to reside and congregate as well as integrate into surrounding communities within York. This is subject to where the delivery of sites but should be positive in the long-term. |
| S6 | Reduce the need to travel by private car | ? | The lifestyle of Gypsies, Travellers and Showpeople revolve around travel. The SA recognises that due to this there maybe some conflict with this objective but that this is intrinsically linked this minority group . However the policy does stipulate that sites should have pedestrian access and offer the potential to work on site as well as have access to local services, which should positively contribution to this objective. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | ? | The lifestyle of Gypsies, Travellers and Showpeople revolve around travel. The SA recognises that due to this there maybe some conflict with this objective but that this is intrinsically linked this minority group . However the policy does stipulate that sites should have pedestrian access and offer the potential to work on site as well as have access to local services, which should positively contribution to this objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | O | There is no direct link between this policy and the objective. |
| S9 | Quality affordable housing available for all | ++ | Comments stand as per the Preferred Option analysis which stated that the additional 36 pitches for Gypsies and Travellers and 13 plots for Showpeople should improve the availability of housing for this population. The implementation of this policy will allow places for Gypsies, Travellers and Showpeople to live in a lifestyle in which they wish to live, particularly given the provision of both temporary and permanent pitches. . The numbers of |

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| | | | pitches outlined responds to the need gathered from various evidence base and should help to answer to the immediate need for families in York. |
| S10 | Social inclusion and equity across all sectors | + | Comments stand as per the Preferred Option analysis which stated that the provision of pitches and plots for these population will help to redress inequalities which currently exist. In addition to this, it is therefore recognised that the delivery of future pitches and plots which meets the demand for this minority group will meet this objective. It will increase equity to more of the right type of places that Gypsies, Travellers and Showpeople wish to live. |
| EN1 | Land use efficiency that maximises the use of brownfield land | ○ | The locations for lots and pitches are yet to be determined and can therefore be assessed at this time. |
| 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 | Comments stand as per the Preferred Options analysis which identified that the pressure to provide sites could threaten the character and setting of York, as noted in the Design guide for Gypsy and Traveller sites (DCLG, 2008). The SA considers that the policy could make reference to the historic character and setting considerations for development. Reducing the incidences of illegal encampment however should have positive effect on this. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development are covered in the Housing Growth policy analysis. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | I | Comments stand as per the Preferred Options which identified that there will be less traffic associated with unsuitable pitches and places of work. This policy requires sites to have access to schools and facilities as well as the potential for employment on site. This should make a positive contribution to minimising trips. |
| EN5 | Improve air quality in York | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development are covered in the Housing Growth policy analysis. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | | Comments stand as per the Preferred Options which stated that renewable energy sources should be considered on Gypsies, Travellers and Showpeople sites to make a positive contribution to this objectives. Also, the caravans in which these populations reside do not correspond to government guidelines with regards to design and construction and therefore the site itself will need to be high spec in order to achieve this objective. |

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| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | I | Comments stand as per the Preferred Options analysis which identifies that providing adequate sites and facilities should help to reduce illegal encampments which can lead to problems of indiscriminate dumping of waste. Implementation of the waste hierarchy should also be promoted on sites. |
| EN8 | Maintain and improve water quality | O | There is no direct link between this policy and the objective. Comments with regards to housing development are covered in the Housing Growth policy analysis. |
| EN9 | Reduce the impact of flooding to people and property in York. | I | Comments stand as per the Preferred Options analysis which states that the laying of hard standing may result in increased pluvial flood risk and therefore, as part of the design and construction of sites, permeable surfaces should be used as well as the incorporation of greenspace. |

| Policy CS9: Housing Density | | | |
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| The LDF will ensure that new residential development will contribute to an efficient use of land through achieving the following minimum net housing densities: <ul style="list-style-type: none"> - City Centre 75 dwellings per hectare; - Urban area 50 dwellings per hectare; - Suburban area 40 dwellings per hectare; - Rural area 30 dwellings per hectare. | | | |
| | Headline objective: Reduction of York's Ecological Footprint | I/+ | This policy, in combination with the spatial strategy aims to develop more housing within the city centre and sequentially less towards the periphery and in rural areas. This will locate housing in areas which have good access to service, facilities and transport routes maximising the achievement of the headline objective through minimise trip generation. This should be positive in the long-term |
| EC1 | Good quality employment opportunities for all | O | There is no direct link between this policy and the objective. |
| EC2 | Good education and training opportunities for all which build the skills of the population | O | There is no direct link between this policy and the objective. |

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| EC3 | Conditions for business success, stable economic growth and investment | O | There is no direct link between this policy and the objective. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | I | This policy, in combination with the spatial strategy aims to develop more housing within the city centre and sequentially less towards the periphery and in rural areas. This will help to maintain the viability and vitality of shops and services within the city centre and sub-regional areas, including local shopping parades. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | O | There is no direct link between this policy and the objective. |
| S2 | Maintain or reduce York's existing noise levels | O | There is no direct link between this policy and the objective. |
| S3 | Improve the health and well being of the York population | O | There is no direct link between this policy and the objective. |
| S4 | Safety and security for people and property | O | There is no direct link between the policy and the objective. Comments |
| S5 | Vibrant communities that participate in decision-making | I/+ | Comments are as per the Preferred Options which stated that developing a sustainable community should be at the heart of housing development. This policy aims to provide more dense housing in the city centre compared to other areas of the city. Any development will need to make sure the density is intrinsically linked the housing mix and type in order for the right type of properties to be located within different areas to cater for demand and overall housing need. |
| S6 | Reduce the need to travel by private car | O | There is no direct link between this policy and the objective. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | O | There is no direct link between this policy and the objective. |
| S8 | A transport network that integrates all modes for effective non-car | O | There is no direct link between this policy and the objective. |

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| | based movements | | |
| S9 | Quality affordable housing available for all | + | The implementation of this policy is intrinsically linked to the need for the provision of housing and maximising the number of houses to be provided. It should be taken forward in conjunction with the other housing policies set out in this section and make sure that the density allows for all social infrastructure required with the number of dwellings. |
| S10 | Social inclusion and equity across all sectors | O | There is no direct link between this policy and the objective. |
| EN1 | Land use efficiency that maximises the use of brownfield land | ++ | <p>This policy directly works to maximise the amount of housing to be attained from land in different areas of York in keeping with the area types in which the development will take place. Pressure to maximise the outcomes from development and competing uses is particularly high within the city centre and this policy takes consideration of this by making this the zone with the highest density and reflects the need to maximise use of the land in this location. The policy advocates 75 dph in this location which is deemed acceptable given its proximity to local services and transport routes but should also reflect the need of the Housing Market assessment. It will be important that the density does not adversely effect the character and setting of York. This includes the historic infrastructure, consideration for important views as well as height, massing and existing density of buildings. Development in more rural areas are expected to develop at 30 dph. This will be more in keeping with the current character of rural locations in York but may not fully maximise the potential of the land to meet demand in these areas.</p> <p>The policy does not include information regarding the net to gross ratio for development compared to other site factors such as infrastructure on site as per the recommendation at the Preferred Options Stage. However, the evidence base has used the net to gross ratio on comparable site to determine the net density required on a site. This is now referenced in the policy and the SA welcomes this. This is something that the Allocations document needs to pursue in detail however on an individual basis where necessary.</p> <p>In implementing this policy it will be important that any identified issues regarding the historic character and setting or green infrastructure are taken into account as well as the other housing policies and spatial requirements set out in the Core Strategy.</p> |

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| 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 | ?/! | Zoning the city into areas which have different densities, to some extent, meets a need to consider the character and setting of the city. Evidence base has been used to determine these zones and which areas are likely to be able to take more dense or less dense development. Directing the majority of the development to the sub-regional centre, which identified in this policy as the City centre (75 dph), the urban area (50pdh) and the suburban area (40 dph) takes account of the existing city. However, the SA is conscious that development needs to take overall consideration for the cumulative impacts of development on the historic city and its associated historic assets. Concentrating development in the city centre needs to balance provision against preserving but also enhancing the historic city, its infrastructure and overall quality which makes it unique. Whilst the SA supports the use of a sliding scale for density, it should not preclude individual assessment of a developments impacts in the context of its surroundings or the overall city. More detail of this is given within the analysis for Policy CS5 regarding the Historic Environment. Further analysis has also been undertaken in the Heritage Impact Assessment which should be read in conjunction to this document. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | + | Directing higher density development in the city centre coupled with the spatial strategy which directs development predominantly to the sub-regional centre, will help to minimise the up take of other greenfield sites which is positive for this objective. Comments as per green space to be provided in conjunction to housing development is within the analysis for Housing Growth. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | + | The focus of higher density development within the sub-regional centre and to a lesser extent the suburban area as per SP1 will help ensure that development is located in close proximity to existing transport routes which should help to minimise vehicle trips an associated emissions. There is the potential for higher density development to link into larger scale renewable energy schemes or use combined heat and power to minimise energy consumption and maximise its contribution to mitigate effects which adversely impact on climate change. This could be particularly influential on large identified schemes within the city centre and urban area. It should be noted that any large scale renewable energy schemes take consideration of their location and be implemented where appropriate as it is identified through literature that Biomass, for example, can adversely effect air quality. |
| EN5 | Improve air quality in York | ? | The focus of higher density development within the sub-regional centre and to a lesser extent the suburban area as per SP1 will help ensure that development is located in close proximity |

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| | | | to existing transport routes which should help to minimise vehicle trips and associated emissions. However, higher density development within the city centre need to also adopt measures which minimise air pollution and emissions which would be detrimental to areas which already exceed or breach acceptable concentrations. The city centre is particularly vulnerable and already has an AQMA. Measures to mitigate this should be in line with those set out in the Air Quality policy. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development are covered in the Housing Growth policy analysis. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development are covered in the Housing Growth policy analysis. |
| EN8 | Maintain and improve water quality | ○ | There is no direct link between this policy and the objective. Comments with regards to housing development are covered in the Housing Growth policy analysis. |
| EN9 | Reduce the impact of flooding to people and property in York. | ? | Housing development overall needs to take consideration for flooding. The particular consideration for this policy is for the city centre. Housing growth could potentially have adverse effects through the construction of hard standing from buildings and infrastructure. Higher density development needs to take particular precautions in minimising adverse effects through surface run-off and should implement SUDs. Building materials and construction will play a particular role in this as well. Consideration for design and construction outline by Policy 21 should therefore be intrinsically linked to this policy. |

Policy CS10: Affordable Housing

To help improve affordability across the housing market, the Council will support residential development schemes involving 2 or more dwellings which:

- i. provide affordable housing in line with the *Affordable Housing Viability Study (2010)* (AHVS) current annual dynamic targets and thresholds;
- ii. reflect tenure split in terms of social rented and intermediate housing, as set out in the current SHMA;
- iii. reflect current assessments of local need, in terms of the size and type of housing provided, as set out in the current SHMA;
- iv. integrate affordable with market housing on a pro-rata basis, on-site. On sites of 5 or more homes, off-site provision or commuted payments for affordable housing will only be acceptable provided it is robustly justified and contributes to the creation of balanced,

- v. mixed and sustainable communities; and retain affordable housing at an affordable price for future eligible households, through implementing a planning condition or obligation, or if these restrictions are lifted, for subsidy to be recycled for alternative housing provision;

Where developers demonstrate to the Council’s satisfaction that the development would not be viable based on current affordable housing dynamic targets, the Council will adopt the following cascade mechanism to increase site viability:

- 1) Seek Homes and Communities Agency subsidy (or other public subsidy) to achieve the level and mix of affordable housing consistent with the policy;
- 2) Vary the tenure mix of the affordable component and/ or the type of units provided if appropriate; and
- 3) See a reduction in the overall amount of affordable housing sought.

To maximise affordable housing, the Council will seek Homes and Communities Agency subsidy (or other public subsidy) on eligible schemes to meet the long term need target, and negotiate with developers the inclusion of this within the scheme.

Exception Sites

As an exception to the normal operation of the above policy, in York’s rural area (as shown on Figure 9.1) planning permission will be granted for schemes of 100% affordable housing which are:

- designed to meet identified local housing needs;
- located on small sites within the settlement boundary. Sites adjoining the settlement boundary will only be allowed where there are no sites available within the settlement itself; and
- retained at an affordable price for future eligible households in perpetuity.

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| | Headline objective: Reduction of York’s Ecological Footprint | I | Comments stand as per the Preferred Options document which stated that the development of housing will have an inevitable impact on the ecological impact given that it has implications for on consumptions and travel patterns. Overall it was deemed that the impact would be determined upon implications as it will be affected through location and building standards. |
| EC1 | Good quality employment opportunities for all | I/+ | Comments stand as per Preferred Options, which stated that there was no direct link between this objective and the policy although house building in general will sustain job opportunities for builders, developers and associated tradesmen. |

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| EC2 | Good education and training opportunities for all which build the skills of the population | O | Comments as per the Preferred Options stage which stated there was no direct link between this policy and the objective. |
| EC3 | Conditions for business success, stable economic growth and investment | +/I | The provision of housing is essential in providing for the workforce in York. The provision of affordable housing is paramount in enabling people to afford to buy and rent properties within the authority. The overall aim of providing more affordable homes is positive in being able to achieve this. The approach set out in the revised policy is a percentage sliding scale approach dependent on the number of houses permitted to be developed. The approach will help to distribute affordable dwellings on sites of 5 dwellings and above around the city, which means it should provide benefits for people being able to live near to places of employment. Further to this, the provision of new housing will also help to support facilities in the local area in which they are built. This will be beneficial in maintaining or enhancing local viability for services and facilities. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | I | Comments stand as per the Preferred Options, which stated that housing development will help to maximise the use of existing facilities. The overall requirement of this should be for the entire housing site in order to capture the needs of services. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | I | Comments stand as per the Preferred Options analysis which identified that new housing development will incur a need for openspace and access to leisure facilities. The spatial strategy will direct development within the sub-regional area primarily, which contains the majority of these facilities. The SA acknowledges that this policy also considers exception sites for affordable housing. The SA will expect that relevant policies regarding green Infrastructure and openspace will be applied in order to make sure all sites have adequate access to recreational spaces. |
| S2 | Maintain or reduce York's existing noise levels | I | Comments stand as per the Preferred Options analysis which identified that the impacts will be in the short-term for the duration of any building works. |
| S3 | Improve the health and well being of the York population | + | Comments stand as per the Preferred Options analysis which identified that the impacts on health and well-being will be positive through the provision of affordable decent quality housing. |
| S4 | Safety and security for people and property | +/I | Comments stand as per the Preferred Options analysis which identified that the provision of affordable homes is important for peoples financial security. This is particularly important in York as it is seen in the baseline information that house prices currently outstrip income and therefore peoples ability to obtain mortgages and finance etc. The revised sliding scale |

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| | | | approach will provide more affordable housing across the city pepper potted in small and large development which should provide more people with the opportunity to be able to live in properties they can afford. |
| S5 | Vibrant communities that participate in decision-making | I | The SA welcomes the need to integrate affordable housing into housing developments in order to make sure they are an integral part of the community in both large and small housing developments as well through off-site provision. Inclusion of different types of homes in a new community, particularly large sites such as York Northwest, will provide residents with the opportunity to join in local events and be actively part of the community should they choose to do so. Ultimately the achievement of this objective will be determined upon implementation. |
| S6 | Reduce the need to travel by private car | ?/I | Comments stand as per the Preferred Options analysis which demonstrates that the impact on this objective is mostly in relation to the location of new housing development set out by the Core Strategy Policy relating to the Scale and Growth of Housing. Further to this, the revised policy includes for the potential for exception sites within the rural area. Depending on where this is located, it has the potential to increase the need to use the car given that the majority of villages have limited public transport access. In this scenario, the benefits of the housing development will need to be weighed up against the possible adverse environmental impacts with a scheme to minimise and mitigate any impacts identified. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | I | Comments stand as per the Preferred Options analysis which demonstrates that the impact on this objective is mostly in relation to the location of new housing development set out by the Core Strategy Policy relating to the Scale and Growth of Housing. |
| S8 | A transport network that integrates all modes for effective non-car based movements | I | Comments stand as per the Preferred Options analysis which demonstrates that the impact on this objective is mostly in relation to the location of new housing development set out by the Core Strategy Policy relating to the Scale and Growth of Housing. |
| S9 | Quality affordable housing available for all | ++ | The revised policy will directly meet this objective. The policy intends to seek affordable housing for any sites with more than 5 dwellings and financial contributions from developments of between 2-5 dwellings. Only in circumstances where this is proved otherwise will there be deviation from this as stated in the policy. This strong policy approach will help to maximise the amount of affordable housing provided in York where there is a proven need for affordable housing. The baseline and evidence base information states that the demand for affordable dwellings is higher than the permitted amount of housing development allowed for annually by the city set in Policy CS6. It is paramount therefore that |

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| | | | <p>the approach is proved viable and implemented on all applicable sites in order to achieve this objective. Given that this approach is based upon an annual review of viability which could increase or decrease the amount of affordable housing to be developed on each site, the SA supports the approach to try and make the site viable firstly using the annual review, followed by pursuance of Communities Agency grant, varying the tenure/mix and lastly by an overall reduction in the number of dwellings. The SA acknowledges that not all unviable sites will meet the requirements for grant funding and that a measure to revise the tenure /mix prior to reducing the number of homes is included. The SA welcomes this alternative approach to try to maximise the numbers of dwellings provided.</p> <p>SA also welcomes the inclusion of a direction to retain existing affordable housing at an affordable price for future eligible households and where this cannot be the case, the subsidy to be recycled for alternative housing provision. This should ensure the stock of affordable housing within the city continues to grow.</p> <p>The policy also states that the tenure and mix of housing to be developed will need to follow the latest need as per the evidence base (SHMA). This should ensure that the right type of housing is provided to meet the need identified.</p> |
| S10 | Social inclusion and equity across all sectors | +/? | <p>The provision of affordable housing will help to reduce barriers to housing within the city and provide greater equity of access to homes that are suitable, decent and affordable. The revised policy particularly addresses this through requiring sites above 2 dwellings to contribute to affordable housing within the city to maximise the number of dwellings provided.. Furthermore, the policy allows for 100% affordable housing sites within villages, and subject to other requirements, adjacent to villages where no sites are available within the settlement boundary. Rural areas of York can particularly exclusionary due to high house prices and this policy would help to progress sites, subject to other factors, to redress this to allow people to live in these areas.</p> |
| EN1 | Land use efficiency that maximises the use of brownfield land | + | <p>The Spatial Strategy will direct development sequentially around the authority. Any sites which are identified for housing in the Core Strategy or Allocations DPD will have a requirement for Affordable Housing under this policy, provided they are over 2 dwellings. The provision of affordable homes on sites is an appropriate use to maximise the use of the sites. The potential for conflict between site viability and the development of affordable homes as</p> |

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| | | | well as other site priorities has been reduced through the policy wording. The policy is directly influenced by viability to guide the percentage of development on site to make sure the Council's requirements are realistic and valid. The SA supports the approach to seek grant funding where lower viability levels are proved, followed by a revised housing tenure/mix and only then a reduced number of affordable dwellings. The strong policy approach can therefore take regard for individual circumstances as well as a standard approach for all developments. The SA deems that the overall approach will positively contribute to this objective for maximising the potential of affordable housing on all sites. |
| 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 | Any housing development will need to consider York's historic character and setting. The overall housing scheme will need to take consideration of wider factors to make sure that no aspects of the character of York is compromised. Given that the majority of development is aimed towards the sub-regional centre, the wider setting of York at the moment should be preserved. Affordable housing, in the majority of cases, will form part of an identified housing site and should incorporate the same characteristics as the rest of the site to not make them distinct. However, the development in this area must take account of the characteristics which combined make the qualities of York unique; particularly the cumulative impact of any windfall development, which by definition, is unable to be unidentified. Where any 100% affordable sites are granted in or adjacent to villages, this will need to complement the style, density and size of the village and be developed in areas which are not of value in maintaining the greenbelt. This will be determined upon implementation through submission of designs and layout for housing. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ?/I | Affordable housing is anticipated to form part of identified sites and located as per the spatial strategy. Given that this directs development away from areas outside of the settlement boundary, this should have a positive effect on this objective. Furthermore, development sites will need to take account of the green infrastructure policy and any identified nature conservation sites to make sure no development compromises the integrity of any biodiverse site. It will be important that green infrastructure associated with the developments is provided in tandem with the new dwellings to maximise accessibility to recreational and natural space. Development should also aim to incorporate areas which could enhance biodiversity through provision of different habitats, particularly on larger sites which could be linked to existing wildlife corridors. |
| EN4 | Minimise greenhouse gas | I | All housing will be subject to strong principles for sustainable design and construction which |

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| | emissions and develop a managed response to the effects of climate change | | should help to mitigate and offset the development through low carbon construction techniques, energy efficient design, renewable energy generation, sustainable resource use and water management techniques for example. The Spatial Strategy will also direct development to the sub-regional area primarily and the larger villages. Both of these locations have public transport links as well as access via established cycling routes. Directing development to these areas therefore should help to minimise trip generation via private car and encourage use of existing transport routes. Enhancements to these networks is also included within the Core Strategy to encourage uptake. The SA recommends for this to have maximum effect, that any improvements take place alongside development to avoid a lag-time to make sure people can travel in a sustainable way from the outset. In order to meet this objective, a real commitment to ensuring the continuation of high quality sustainable design and construction standards as well as improvements to travel modes is needed. |
| EN5 | Improve air quality in York | ?/I | The Spatial strategy will direct housing development to primarily the sub-regional area. Air quality action areas and hotspots have been identified in certain locations near the city centre and along Fulford Road as there have been breaches of certain air pollutants. Housing developments have to take account of additional air quality pressures which may result from their development and implement measure to mitigate any adverse impacts. Housing development is subject to Policy CS19 regarding Air Quality. This policy should help to encourage energy efficiency and cleaner fuel use as well as site specific measures to avoid worsening air quality. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | ?/I | There will be an inevitable impact from housing development of use of energy, water and other natural resources. Housing development will be subject to national standards as well as other policies within the plan setting out a clear direction for sustainable design and construction as well as resource use. This should help housing development adhere to high standards which help to minimise impacts on this objective through resource efficiency measures, water management techniques and sustainable waste processing. The impact on water may be less severe as the Water Management Plan release by Yorkshire Water takes development into consideration and states there should be no shortage over the plan period. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ?/I | New housing will have an inevitable impact of the generation of waste. It is paramount that any household or commercial waste arising from the sites is disposed of in line with the waste hierarchy. New housing development should be developed in line with the waste strategy set out in policy CS23. |

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| EN8 | Maintain and improve water quality | O | There is no direct link between this policy and the objective |
| EN9 | Reduce the impact of flooding to people and property in York. | ?/I | The development of housing has the potential to adversely impact on flood risk. All housing development should aim to minimise their impact and incorporate mitigation measures where they have identified adverse impacts to either fluvial or pluvial flooding. Construction techniques and materials will also be central to this approach. Any housing development will therefore need to adhere to policies within the Core Strategy relating to Flood Risk, Resource Efficiency and sustainable design and construction to fully achieve this objective. |

Policy CS11: Community Facilities

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| <p>LDF will promote community cohesion and the development of strong, supportive and durable communities through the creation of sustainable, low carbon neighbourhoods where every community has access to quality community facilities to meet day to day needs. This will be delivered through the following:</p> <ul style="list-style-type: none"> i. locating new residential development in locations with good accessibility to a range of community facilities and frequent public transport; ii. requiring new or improved community facilities to be provided to accompany new residential development where required, to ensure sufficient quality facilities for existing and future occupiers; iii. requiring any new community facilities to be in locations which are well served and linked by public transport and accessible by walking and cycling; iv. refusing proposals which fail to protect existing community facilities or involve the loss of facilities unless it can be demonstrated the use is no longer, or cannot be made, commercially viable or satisfactory alternative provision can be made; v. producing neighbourhood plans and implementing the actions arising from the Council's AAMPs to ensure community facilities and services are 'fit for purpose' and to work towards meeting any identified gaps in provision through the planning process; vi. facilitating the development of city wide and large scale built sports facilities to meet demand, including the provision of a new swimming pool and community stadium; and vii. supporting the provision of new small scale retail facilities in local centres and neighbourhood shopping parades, where they would provide for local needs and not be harmful to the vitality and diversity of nearby centres. | | | |
| | Headline objective: Reduction of York's Ecological Footprint | + | One of the key elements to this policy is that any new services need to be in locations met by local transport as well as walking and cycling. The promotion of sustainable transport options to these services and facilities will help to minimise car-based journeys which in turn will help to minimise greenhouse gas emissions. Depending on how this policy is implemented in |

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| | | | terms of available transport to the facilities, it will be positive in terms of helping to reduce the carbon footprint from transport. |
| EC1 | Good quality employment opportunities for all | + | The continued provision of facilities will ensure stability of existing within the community facilities. Also, the provision of new facilities would create a small number of additional posts in the local area. These opportunities may be specialist within certain community uses and there would be limited opportunities within smaller villages. |
| EC2 | Good education and training opportunities for all which build the skills of the population | + | The provision and maintenance of existing community facilities provide places for people to meet and the opportunity to learn. Whilst this policy does not specifically address educational opportunities (picked up instead by policy CS13) it does create the opportunity through different facilities (day centers, drop-in centres, meeting rooms, youth clubs and spaces for community groups) to be able to learn skills and provide training within the local area. The SA considers that this policy therefore meets this objective. |
| EC3 | Conditions for business success, stable economic growth and investment | + | The provision of services and facilities is important to support the workforce of York. The creation of a variety of facilities may also attract investment into the city as supporting and associated businesses may potentially expand or create links with the facilities provided. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | ++ | The policy meets this objective by seeking to provide communities within York with local community facilities. This policy, in combination with policy CS17 Retail and CS13 education, will help to ensure that sustainable development is achieved by residents having local access to food, healthcare, education and a community support network. This policy actively wants to meet any gaps identified within the city in terms of facilities to make sure they are accessible to all. The policy also provides a hook for the allocation DPD to be able to specify the locations of any identified built sports facilities. However, the policy no longer mentions which sports facilities may be suitable |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | + | This policy will enable access to a wider selection of leisure activities through the provision and maintenance of community and sports facilities in the local area. The provision of sports facilities will be inline with need although the specific sites will be pursued through the Allocations DPD. The Objectives for this policy aim to provide all communities with access to a range of community and leisure facilities, which will directly help to achieve this objective. |
| S2 | Maintain or reduce York's existing noise levels | l | The policy will not directly affect this objective. However, new facilities, particularly the proposed community stadium, will need to make allowance for noise issues which may effect local residents. |
| S3 | Improve the health and well being | + | The intention to maintain and increase provision of community and sports facilities within York |

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| | of the York population | | is positive in terms of improving peoples health and well-being. Access to more sports facilities would help to increase access to fitness activities and encourage people to actively participate. Access to a range of other communities facilities would also lead to a variety of other activities which would engage people for a broad range of activities aiding well-being. |
| S4 | Safety and security for people and property | ○ | There is no direct link between this policy and the objective. |
| S5 | Vibrant communities that participate in decision-making | + | This policy would contribute towards this objective for two reasons specifically. Firstly, the provision of different types of facilities and meeting facilities such as halls, meeting rooms etc would allow people to meet for various purposes, including for ward meetings for example and allow advertising of events to take place. Secondly, the policy refers to Area Assets Management Plans which involve a degree of public consultation and involvement. Using these documents as an evidence base for the policy is considered to help meet this objective. |
| S6 | Reduce the need to travel by private car | + | This objective is met by this policy with the explicit requirement of new services to be in locations which are well served by public transport and accessible by walking and cycling. It is anticipated that promotion of alternative modes of transport would help to reduce the number of car journeys and necessity of using the car to access the facility. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | l | This objective is met by this policy with the explicit requirement of new services to be in locations which are well served by public transport and accessible by walking and cycling. |
| S8 | A transport network that integrates all modes for effective non-car based movements | ○ | There is no direct link between this policy and the objective although developing new facilities within close proximity to public transport routes would be effective in reducing car movements. |
| S9 | Quality affordable housing available for all | ○ | There is no direct link between this policy and the objective. |
| S10 | Social inclusion and equity across all sectors | ++ | The continued provision and new development of community and leisure facilities will directly meet this objective. The policy aims to provide facilities which are accessible to the local community. Making sure that the facilities will be accessible by public transport and on foot/by cycling will also facilitate equity of access and would therefore further support is objective. |
| EN1 | Land use efficiency that | ○ | There is no direct link between this policy and the objective.. Issues concerning the location of |

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| | maximises the use of brownfield land | | the facilities will be dealt with in the Allocations DPD 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 | The policy aims to resist the loss of community facilities. This protection may help to prevent the character of an area changing and the development of new facilities may help to enhance the community character in others. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | O | There is no direct link between this policy and the objective |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | I | By providing services within distance of public transport services and with access on foot and by cycling, this would have a positive effect on the helping to minimise greenhouse gas emissions. |
| EN5 | Improve air quality in York | I | Promoting public transport access as well as walking and cycling to any new community facilities will have a positive effect on air quality through the reduction of car-based emissions. Also, there is a chance to promote improved air quality in new developments in line with the air quality policy in order for community facilities to meet this objective further. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | I | There is no direct link between this policy and the objective. However, any new development of community facilities would need to adhere to the sustainable design and construction standards set out by additional policies within the Core Strategy. It is assumed that this would include energy efficiency measures to minimise energy use and maximise water efficiency. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | O | There is no direct link between this policy and the objective |
| EN8 | Maintain and improve water quality | O | There is no direct link between this policy and the objective |
| EN9 | Reduce the impact of flooding to people and property in York. | O | There is no direct link between this policy and the objective. However, any new development of facilities would need to take consideration of the flood policy within the Core Strategy in order to locate in areas which would not adversely effect flood risk. |

| Policy CS12: Healthcare and Emergency Services | | | |
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| To contribute to residents living long, healthy and independent lives in sustainable neighbourhoods the LDF will support: | | | |
| <ul style="list-style-type: none"> i. the York Hospitals NHS Foundation Trust and North Yorkshire and York Primary Care Trust (and any subsequent body) to make the best use of their current sites within the City, in particular by facilitating improvements to York District Hospital (as identified on the Key Diagram) to enable it to remain on its existing site for the long term; ii. healthcare services that are responsive to current and projected needs of communities. This may include new services to meet the needs of future occupants from new development alongside the redevelopment of existing facilities. It will involve working collectively with the Primary Care Trust, York Health Group alongside other GPs and their communities; and iii. the emergency services to continue to provide an effective service, in particular through facilitating the development of the 'hub and spoke' system for the Ambulance service and meeting any requirements for new fire stations. | | | |
| | Headline objective: Reduction of York's Ecological Footprint | o | There is no direct link between this policy and the objective. |
| EC1 | Good quality employment opportunities for all | + | The continued support and provision of healthcare facilities will ensure stability of existing jobs within York. Any new opportunities would be specialist relating to healthcare but would be positive in providing skilled jobs within the authority. |
| EC2 | Good education and training opportunities for all which build the skills of the population | O | There is no direct link between this policy and the objective |
| EC3 | Conditions for business success, stable economic growth and investment | + | The provision of healthcare facilities is important to support the workforce of York. Support for the existing network of services is important in order to deal with future population issues arising such as the acknowledged aging population. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | ++ | The policy meets this objective by seeking to support local healthcare services at a variety of scales within the local authority. The policy aims to provide a healthcare service which responds to the current and projected needs of communities meaning that facilities will be provided where necessary and in line with any new development. Further to this, redevelopment of services is also stated which will help to make sure the services provided are the most effective for the local communities. |
| S1 | Enhance access to York's urban and rural landscapes, public | O | There is no direct link between this policy and the objective |

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| | openspace / recreational areas and leisure and cultural facilities for all | | |
| S2 | Maintain or reduce York's existing noise levels | O | There is no direct link between this policy and the objective |
| S3 | Improve the health and well being of the York population | ++ | This objective is directly met by this policy. The policy aims to help residents of York live long and healthy lives through the continued and effective provision of healthcare facilities for all. |
| S4 | Safety and security for people and property | O | There is no direct link between this policy and the objective. |
| S5 | Vibrant communities that participate in decision-making | O | There is no direct link between this policy and the objective |
| S6 | Reduce the need to travel by private car | I | The extent to which the policy meets this objective will depend upon implementation. Healthcare facilities provided in the local area would help to encourage people to walk to the facilities and would help to achieve this objective. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | I | The extent to which the policy meets this objective will depend upon implementation. Healthcare facilities provided in the local area would help to encourage people to walk to the facilities and would help to achieve this objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | O | There is no direct link between this policy and the objective although developing new facilities within close proximity to the communities in need may be effective in reducing car movements. |
| S9 | Quality affordable housing available for all | O | There is no direct link between this policy and the objective. |
| S10 | Social inclusion and equity across all sectors | O | There is no direct link between this policy and the objective. |
| EN1 | Land use efficiency that maximises the use of brownfield land | O | There is no direct link between this policy and the objective. |

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| 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 | There is no direct link between this policy and the objective. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | o | There is no direct link between this policy and the objective |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | o | There is no direct link between this policy and the objective. |
| EN5 | Improve air quality in York | o | There is no direct link between this policy and the objective. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | o | There is no direct link between this policy and the objective. However, any new or re-development of healthcare facilities would need to adhere to the sustainable design and construction standards set out by additional policies within the Core Strategy. It is assumed that this would include energy efficiency measures to minimise energy use and maximise water efficiency. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | o | There is no direct link between this policy and the objective |
| EN8 | Maintain and improve water quality | o | There is no direct link between this policy and the objective |
| EN9 | Reduce the impact of flooding to people and property in York. | o | There is no direct link between this policy and the objective. However, any new development of facilities would need to take consideration of the flood policy within the Core Strategy in order to locate in areas which would not adversely effect flood risk. |

Policy CS13: Education, Skills and Training

To support York's role as a world class centre for education and lifelong learning the LDF will:

- i. facilitate the provision of sufficient modern education facilities for the delivery of preschool, primary and secondary school education to meet

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| <p>identified need and address deficiencies in existing facilities. Including new provision to support the York Northwest Strategic Allocations (York Central and Former British Sugar/Manor School) and other Major Development Opportunities as indicated on the Key Diagram and to support major new housing sites;</p> <p>ii. support any future developments of Academies and Free Schools which reflect the aspirations of local communities;</p> <p>iii. ensure that all new schools have sufficient and appropriate playing field provision and take opportunities to deliver additional playing fields for existing schools identified as having a deficiency, as part of new developments in the vicinity of the schools;</p> <p>iv. support the continued success of all further and higher education institutions, including any further expansion of their teaching and research operations, other facilities and student accommodation at their existing sites and campuses as shown on the Key Diagram, namely:</p> <ul style="list-style-type: none"> - University of York (including the Heslington East expansion) - York St. John University - College of Law - Hull York Medical School - York College - Askham Bryan College; <p>v. All future increases in student numbers as a result of future Higher Education expansion proposals must be matched by a corresponding increase in purpose built student accommodation;</p> <p>vi. identify sufficient land to facilitate anticipated growth at York College and continued delivery of its facilities at one location; and</p> <p>vii. secure wider community access to existing sports and cultural facilities on all education sites and promote the development of new high quality education and related facilities which support community use of their facilities.</p> | | | |
| | Headline objective: Reduction of York's Ecological Footprint | ○ | There is no direct link between this policy and the objective. |
| EC1 | Good quality employment opportunities for all | ++ | Support for educational establishments of all levels will hopefully help to secure people within their teaching and academic, as well as research, roles within York. The two universities in particular will have a great role in this as well as any expansion or modernisation of schools. Continued educational success can also be a draw for employers who may provide quality employment. |
| EC2 | Good education and training opportunities for all which build the skills of the population | ++ | This policy will directly meet this objective through the support and provision of facilities and institutions themselves, including addressing any deficiencies which are currently identified. Opening up facilities for wider community access will be beneficial for the public in terms of greater access to training and building their skills. The SA also welcomes the inclusion of |

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| | | | “modernised education facilities” as part of the policy which should make sure that into the future, suitable upgrading and improvements are made to facilities to ensure skills and training can be carried out effectively. |
| EC3 | Conditions for business success, stable economic growth and investment | ++ | The support in this policy for education skills and training will achieve this objective through the provision of a competent and educated workforce. Also, support for the expansion of the universities including their research functions is positive for investment within York. In addition to the investment at the universities themselves, the SA anticipates that this will also have indirect positive effects on the economy as there may be strengthened links between the Science City initiative and universities in terms of research and provision of suitable employees. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | ++ | This policy will directly help to achieve this objective. It will be important through the implementation of the policy that new schools and training facilities are targeted to where they are needed the most, including taking into consideration the effects of potential development. |
| S1 | Enhance access to York’s urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | + | The policy will meet this objective by allowing wider access to established sports and community facilities to the wider community. This will not only enhance access to openspace and sports facilities but hopefully cultural amenities as well. This will be particularly important in any areas which currently have a lack of openspace or lack of access to sports and recreational facilities. Whilst the SA supports this agenda for the whole city, areas which lack access to these facilities should be seen as a priority. This, however, is dependant upon implementation. |
| S2 | Maintain or reduce York’s existing noise levels | 0 | There is no direct link between this policy and the objective. |
| S3 | Improve the health and well being of the York population | +/l | Improving access to sports and cultural facilities will have a positive effect on peoples health through improved ability to access and partake in activities. Access to recreational space, sports and other facilities is important to maintain a healthy lifestyle and a sense of well-being. Facilities and sports equipment available at schools should also be varied which will appeal to a broad range of people, provided that different activities are run. |
| S4 | Safety and security for people and property | 0 | There is no direct link between this policy and the objective. |
| S5 | Vibrant communities that participate in decision-making | 0 | There is no direct link between this policy and the objective. |
| S6 | Reduce the need to travel by | l | By widening access to existing facilities for education, skills and training, it should indirectly |

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| | private car | | help to meet this objective by making courses and activities closer to the community. This may therefore have a positive impact on people walking or cycling rather than using the car to travel. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | I | By widening access to existing facilities for education, skills and training, it should indirectly help to meet this objective by making courses and activities closer o the community. This may therefore have a positive impact on people walking or cycling rather than using the car to travel. |
| S8 | A transport network that integrates all modes for effective non-car based movements | O | There is no direct link between this policy and the objective. |
| S9 | Quality affordable housing available for all | +/I | Point v in this policy states that all increases in student numbers in the future as a result of expansion plans should be matched by a corresponding amount of purpose built student accommodation. The SA welcomes this as York has two successful Universities whose student numbers are increasing on an annual basis. Also, given that the University of York has a new campus which will further increase student numbers, the issue of accommodation is critical. Support for the provision of new student accommodation on existing sites is therefore welcomed and should take any further pressure off accommodating students within the existing dwelling stock in the city withint he rental market.It is paramount that this also adheres to other policies set out in the Core Strategy regarding design and construction and accessibility to transport routes, services and facilities as well as the spatial principles. |
| S10 | Social inclusion and equity across all sectors | +/I | Indirectly, this policy could help people feel more socially included if facilities were more accessible. Also, familiarity with school grounds or other facilities may also encourage people to partake and include themselves in any activities advertised. Furthermore, the provision of bespoke student accommodation subject to further expansion should allow more people access to attend the university and may reduce additional pressure on the rental market in the future. |
| EN1 | Land use efficiency that maximises the use of brownfield land | O | There is no direct link between this policy and the objective. |

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| 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 | ○ | There is no direct link between this policy and the objective. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ○ | There is no direct link between this policy and the objective. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | ○ | There is no direct link between this policy and the objective. However, should travel to educational facilities reduce by car, this will have a positive benefit on the production of greenhouse gases which would help to achieve this objective. |
| EN5 | Improve air quality in York | ○ | There is no direct link between this policy and the objective. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | ○ | There is no direct link between this policy and the objective. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ○ | There is no direct link between this policy and the objective. |
| EN8 | Maintain and improve water quality | ○ | There is no direct link between this policy and the objective. |
| EN9 | Reduce the impact of flooding to people and property in York. | ○ | There is no direct link between this policy and the objective. |

Policy CS14: Targeted Recruitment and Training

The LDF will create economic and social benefits for local communities through construction training and targeted recruitment linked to the development process. This will be achieved through building linkages between developers, contractors and jobseekers via the construction of major developments.

Planning applications for major schemes will be subject to an assessment to consider the skills and training requirements in the construction of the

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| project against the local labour market. Applicants will be expected to enter into a Section 106 Agreement to ensure, where feasible and viable, training opportunities are provided and labour is locally sourced. | | | |
| | Headline objective: Reduction of York's Ecological Footprint | O | There is no direct link between this policy and the objective. |
| EC1 | Good quality employment opportunities for all | ++ | This policy directly contributes to the achievement of this objective through training and skills development. Improving peoples' skills will enable them to obtain quality jobs and life-long skills for employment. It will have a vital role in helping to reduce unemployment by making the local workforce flexible and appropriately skilled for the positions available. |
| EC2 | Good education and training opportunities for all which build the skills of the population | ++ | This policy directly contributes to the achievement of this objective through training and skills development. Improving and building on peoples' skills is positive not only in terms of education and self-improvement but for the provision of a flexible and skilled workforce for York. This policy is directed at the construction and building industry, but the SA would like to see this scope broadened to the whole development process to both provide a wider variety of skills and appeal to a broad spectrum of people. |
| EC3 | Conditions for business success, stable economic growth and investment | ++ | This policy directly contributes to this objective by enabling conditions for business success through training opportunities and investment in practical skills within York and developing an able local workforce. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | + | This policy directly contributes to this objective by enabling conditions for business success through training opportunities and investment in practical skills within York and developing an able local workforce. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | O | There is no direct link between this policy and the objective. |
| S2 | Maintain or reduce York's existing noise levels | O | There is no direct link between this policy and the objective. |
| S3 | Improve the health and well being of the York population | O | There is no direct link between this policy and the objective. |
| S4 | Safety and security for people and property | O | There is no direct link between this policy and the objective. |

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| S5 | Vibrant communities that participate in decision-making | ○ | There is no direct link between this policy and the objective. |
| S6 | Reduce the need to travel by private car | ○ | |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | ○ | There is no direct link between this policy and the objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | ○ | There is no direct link between this policy and the objective. |
| S9 | Quality affordable housing available for all | ○ | There is no direct link between this policy and the objective. |
| S10 | Social inclusion and equity across all sectors | ○ | There is no direct link between this policy and the objective. |
| EN1 | Land use efficiency that maximises the use of brownfield land | ○ | There is no direct link between this policy 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 | ○ | There is no direct link between this policy and the objective. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ○ | There is no direct link between this policy and the objective. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | ○ | There is no direct link between this policy and the objective. |
| EN5 | Improve air quality in York | ○ | There is no direct link between this policy and the objective. |

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| EN6 | The prudent and efficient use of energy, water and other natural resources | ○ | There is no direct link between this policy and the objective. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ○ | There is no direct link between this policy and the objective. |
| EN8 | Maintain and improve water quality | ○ | There is no direct link between this policy and the objective. |
| EN9 | Reduce the impact of flooding to people and property in York. | ○ | There is no direct link between this policy and the objective. |

| Policy CS15: Sustainable Economic Growth | | | |
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| The LDF will support sustainable economic growth delivering increased prosperity. This will be achieved through: | | | |
| <ul style="list-style-type: none"> i. supporting the enhancement of the commercial, business, retail, leisure and tourism role of York city centre, including the delivery of a new urban quarter as a part of the York Central Strategic Allocation; ii. supporting the continued success of the further and higher education institutions; iii. ensuring the provision of a range of employment sites to meet the needs of existing businesses and to maximise inward investment; and iv. safeguarding existing employment, and commercial locations. | | | |
| | Headline objective: Reduction of York's Ecological Footprint | I | The revised economic policy will have a mixed impact on this objective and will mainly reply upon implementation of Policy CS16 regarding employment. Comments with regards to development and location of sites is contained in the analysis for Policy CS16 |
| EC1 | Good quality employment opportunities for all | ++ | Central to this policy is sustainable economic growth and support for a variety of industries within York. The targets for this policy state that the core strategy is aiming for 1000 new jobs per year. The types of jobs are anticipated to be mixed but in line with the enhancement of the commercial, business and tourism sectors and through support for educational establishments. This will be positive in providing a variety of jobs for all. |
| EC2 | Good education and training opportunities for all which build the | ++ | Comments stand as per the Preferred Options analysis which stated that this policy directly meets this objective. . In addition to these comments, the revised policy sets out that one of |

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| | skills of the population | | the key objectives in delivering sustainable economic growth is continued support for further and higher educational institutions. This is expanded within the justification to reflect the contribution that the Universities make towards the economy in terms of not only jobs but also research. In conjunction with policy CS16, which support development (B1b) at York University, this will help to strengthen links further and help to provide training opportunities for students. Also further and higher educational establishments continue to transfer knowledge to the economy through teaching, research and other activities and work towards the provision of a competent workforce. In addition to this the policy regarding education, skills and training builds upon what is outlined within the main economic policy. |
| EC3 | Conditions for business success, stable economic growth and investment | ++ | Comments stand as per the Preferred Options analysis which stated that this policy will directly achieve this objective. This policy supports a variety of measures for supporting business and education as well as the need to provide suitable premises. The achievement of this objective will be intrinsically linked to the implementation of Policy CS16. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | + | This policy will support the implementation and growth of jobs within different sectors of industry and education which will supply jobs for local people. In addition to this the revised policy has emphasis on supporting the education institutions within York. This will mean that quality provision of education is maintained in the local area. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | ? | There is no direct link between this policy and the objective. Impacts from specific sites or location of employment land should be read in policy analysis for CS16. |
| S2 | Maintain or reduce York's existing noise levels | I | This will depend upon implementation. |
| S3 | Improve the health and well being of the York population | ? | Comments are as per the Preferred Options analysis which identified that the effects upon this objective are associated with the types of industries which are present. There should be no deterioration for example in air quality which has adverse impacts on health. Developments should take consideration of the Low Emissions Strategy to be set for the city and any other contamination/ remediation standards /issues which may be detrimental to peoples health and well-being. |
| S4 | Safety and security for people and property | I | Comments stand as per the Preferred Options which state that encouraging and supporting the growth of the economy and jobs should decrease the unemployment rate and help to |

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| | | | stabilise the economy over the lifetime of the plan to counter any downturn in economic experience currently. Also, health and safety on industrial sites is paramount and development should also adhere to flood risk guidance to ensure security of any premises.. |
| S5 | Vibrant communities that participate in decision-making | O | Comments as per the Preferred Options analysis that identified there is no direct link between the policy and the objective. |
| S6 | Reduce the need to travel by private car | I | The location of development will impact on this objective. Comprehensive analysis regarding this is set out in more detail for CS16: Employment Land which gives more detail on this policy. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | I | The location of development will impact on this objective. Comprehensive analysis regarding this is set out in more detail for CS16: Employment Land which gives more detail on this policy. |
| S8 | A transport network that integrates all modes for effective non-car based movements | I | The location of development will impact on this objective. Comprehensive analysis regarding this is set out in more detail for CS16: Employment Land which gives more detail on this policy. |
| S9 | Quality affordable housing available for all | I | Comments stand as per the Preferred Options analysis which identified a link between the economy and housing. This stated that whilst this policy will not directly effect this objective, the provision of jobs and economic growth can influence housing demand and development. A potential conflict was identified between job growth exacerbating housing need relating to affordability and access to affordable homes. The provision of suitable housing is crucial for supporting the needs of the work force and economic growth so a strong link to policies CS6 and CS7 has been identified. The outcome of this policy on the objective will depend upon implementation of the policy. |
| S10 | Social inclusion and equity across all sectors | + | The intention to support commercial business, education and tourism in York will help to provide a variety of jobs which should caters for all skills available within the city. This will help with equity of access to jobs and cater for the diverse skills base in York. |
| EN1 | Land use efficiency that maximises the use of brownfield land | ? | This policy does not state the locations for development but works in conjunction with Policy CS16 for delivery of sites. The impact of this policy are as yet unknown but further analysis is provided alongside Policy CS16. |

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| 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 | <p>The impact upon this objective will depend upon the type, scale and location of development. All development should comply to strong design and buildings standards which should take into consideration the sites setting, surrounding built character and if the proposed use is suitable in order to achieve this objective.</p> <p>Further analysis is provided within the Heritage Impact Assessment which should be read in conjunction to this SA.</p> |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | I | <p>Where sites for employment development have identified biodiversity of high value or are in proximity to sites of high value, every effort should be made by the development to maintain the integrity of the habitat in order to minimise any adverse effects on this objectives. Landscaping on the site could take account and incorporate the natural environment as protection. The development of sites outside of the urban area may have a particular effect on this objective through loss of open land. The biodiversity audit and accompanying action plan framework should be used in determining effects on individual sites. The Habitat Regulation Assessment (HRA) for the Core Strategy and Allocations SA and HRA documents will pick this issue up in more detail for sites of local, national and international importance.</p> |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | I | <p>Employment development should be subject to strong sustainable design and construction guidelines, such as BREAM and other principles set out in the forthcoming design and construction SPD and Policy CS21. Development should include incorporation of energy efficiency measures, renewable energy generation, water management and waste processing in order to fulfill achieve this objective. Where businesses are retrofitting or interested in becoming more sustainable, guidance could also be provided or promotion of energy and resource solutions undertaken to further assist in helping the economy meet this objective.</p> |
| EN5 | Improve air quality in York | ? | <p>Currently York has areas which are in breach of concentrations of different air pollutants and currently has two AQMAs in York in place for this reason. Economic growth, depending on the types of buildings, industries and processing that take place, can influence this. The SA suggests that this policy references the Air Quality policy and Low Emission Strategy as they will need to work in combination with each other.</p> |

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| EN6 | The prudent and efficient use of energy, water and other natural resources | I | Comments stand as per the Preferred Options analysis which states that the achievement of this objective will largely be dependant upon implementation. It will be determined through it adherence to design and construction standards and the incorporation of energy efficiency measures, renewable energy generation, water management and waste processing. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ? | Comments stand as per the Preferred Options analysis which states that there is an inevitable link between economic growth and waste and pollution levels in the city, particularly in conjunction with other new developments. New development should adhere to the processing commercial and domestic waste as per the Waste policy set out in the Core Strategy. |
| EN8 | Maintain and improve water quality | ? | Comments stand as per the Preferred Options analysis which identified that there may be a potential impact on water quality to due to the by-products of some industrial processes. However, the extraction and quality of the rivers are controlled by licensing and permits but planning will play a part in directing development away from the most sensitive areas. |
| EN9 | Reduce the impact of flooding to people and property in York. | I | Comments stand as per the Preferred Options analysis which stated that that it is important to locate employment development where there is not a high risk of flooding or where development is likely to have adverse effects on flooding in York. |

Policy CS16: Employment Land

To ensure continued economic success and prosperity the LDF will providing sufficient land and protect existing employment sites to allow York's economy to realise its potential.

Provision of employment land

1. Provision of employment land for the period 2011–2031 will be made, through the Allocations DPD and City Centre AAP, to accommodate the levels of growth highlighted in Table 11.1. This will be in conformity with Spatial Principles 1 & 2 and address the points below.

(i) New office development (B1a) will be accommodated through:

- allocating sites within York City Centre through the City Centre AAP;
- delivering a new central business district (of 87,000-100,000 sqm) as a part of the YNW - York Central Strategic Allocation;
- utilising the Major Development Opportunities provided by the mixed use redevelopments at Hungate, Terry's and Nestle; and

- identifying land in the Monks Cross area and at York Business Park.
- (ii) Premises for Research & Development (B1b) will be provided through maximising the economic benefits of the city’s education establishments, this will include up to 25 ha of land at the University of York - Heslington East Campus.
- (iii) Additional land will be identified at Northminster Business Park (up to x ha) and vacant sites at existing industrial estates will be identified for the provision of Industry and Distribution (B1(c), B2 and B8) uses. This will include land at York Business Park.
- (iv) Facilitating the development of appropriate rural industries, businesses and enterprises through supporting rural diversification schemes.

Existing Employment Land

2. Proposals for non-employment uses which involve the loss of land and/or buildings which are either identified, currently used or were last used for industrial, business, office or other employment uses, will only be permitted where it can be demonstrated that the proposal would not have a detrimental effect on the future supply of employment land in either quantitative or qualitative terms.

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| | <p>Headline objective: Reduction of York’s Ecological Footprint</p> | <p>?</p> | <p>The revised economic policy will have a mixed impact on this objective. Allocating sites for development which are close proximity to the city centre should be beneficial in the long-term given that the workforce and businesses will be able to utilise existing routes and enhanced sustainable routes set out by the Transport Policy. For those people who live within York, this will encourage them to use their private car less in travelling to work and decrease the need to travel further. A potential conflict with this however, is the potential to identify sites on the periphery of the city which may encourage car use. Sites at Northminster Business park, Monks Cross and the Business Park may particularly attract this. The SA suggests that to mitigate the negative effects, routes are planned which incorporate them to deter car use, particularly at Northminster Business Park. More detail is provided in the transport policy which anticipates the development of a new Park and Ride in this location. The SA identifies that it is right to make a link between the provision of jobs, housing and transport due to the number of jobs projected each year outweighing the number of homes to be provided. The SA is concerned that a lack of housing will encourage more inward commuting into York which will have an overall detrimental impact on the eco and carbon footprint, subject to</p> |
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| | | | the types of transport modes used. Monitoring will need to take place to identify commuting patterns in order to be able to mitigate and offset adverse effects. This includes the issue of commercial traffic which economic growth may increase and not only have an impact on emissions but the overall carbon footprint. The development of new employment premises should also maximise their potential to minimally impact on this objective. The SA suggests that this should be through building standards such as BREAAAM, of which more information will be set out in the Design and Construction SPD. Any employment development adhering to these standards should also provide renewable technologies, resource and waste efficiency measures as well as any flood mitigation measures which may be required in order to work towards this objective. |
| EC1 | Good quality employment opportunities for all | ++ | Central to this policy is economic growth and the provision of employment premises and jobs. The targets for this policy state that the core strategy is aiming for 1000 new jobs per year. The types of jobs are anticipated to be mixed but in line with the enhancement of the commercial, business and tourism sectors. This will be positive in providing a variety of jobs for all. |
| EC2 | Good education and training opportunities for all which build the skills of the population | ++ | Comments stand as per the Preferred Options analysis. In addition to these comments, the revised policy sets out that one of the key objectives in delivering sustainable economic growth is continued support for further and higher educational institutions. This is expanded within the justification to reflect the contribution that the Universities make towards the economy in terms of not only jobs but also research. Allowing for research and development (B1b) at York University will help to strengthen links further and help to provide training opportunities for students. Also further and higher educational establishments continue to transfer knowledge to the economy through teaching, research and other activities and work towards the provision of a competent workforce. In addition to this the policy regarding education, skills and training builds upon what is outlined within the main economic policy. |
| EC3 | Conditions for business success, stable economic growth and investment | ++ | Comments stand as per the Preferred Options analysis which stated that this policy will directly achieve this objective by initiating the provision and retention of employment land to meet the anticipated economic growth targets for York. However the revised policy also includes the following elements: <ul style="list-style-type: none"> • In delivering the new Central Business District on the York Central Strategic Allocation, it will be important that it should not be in competition or be detrimental to |

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| | | | <p>the offer already existing with the city centre in order to maintain the vibrancy of the existing offices currently. It should also not compromise the delivery of site through the City Centre Area Action Plan in order to continue to support the city centre as the focus for employment opportunities.</p> <ul style="list-style-type: none"> • In addition to these comments the SA would like to draw attention to the fact that it is more explicit within the revised policy that existing employment land should be retained unless it can be demonstrated that it would not have a detrimental effect on future supply of land. The SA supports this approach in order to retain a mixture of premises for different types of business. Also, this approach in combination the acknowledgement for facilitating the development of rural industries and rural diversification should help to secure a viable future for established smaller industrial sites. The policy, targets and justification now include information and support for tourism within York. This is an additional element in the policy. In essence the policy aims to deliver growth in tourism and support this by enhancing the commercial business and tourism role of the city centre. The SA encourages this approach to support the city centre as this is currently the hub for tourism. The justification acknowledges that it is a major industry in York today with many jobs linked directly and indirectly to it and this will link to other policy's in the plan such as maintaining the city's character and setting and green infrastructure. • There is a fundamental link between the economy and housing. Whilst this policy will not directly effect this objective, the provision of jobs and economic growth can influence housing demand and development. A potential conflict was identified at Preferred Options between job growth exacerbating housing need relating to affordability and access to affordable homes. The provision of suitable housing is crucial for supporting the needs of the work force and economic growth so a strong link to policies CS6 and CS7 has been identified. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | + | This policy will support the implementation and growth of jobs within different sectors of commercial business and tourism which will supply jobs for local people. In addition to this the revised policy has emphasis on supporting the education institutions within York. This will mean that quality provision of education is maintained in the local area. |
| S1 | Enhance access to York's urban and rural landscapes, public | ? | Although the majority of development is directed towards brownfield locations, which is positive in deflecting development away from greenfield sites, there may be an impact |

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| | openspace / recreational areas and leisure and cultural facilities for all | | through the development employment land at Northminster and Monks Cross. Careful design and landscaping will be necessary to mitigate impacts of development. |
| S2 | Maintain or reduce York's existing noise levels | ? | Comments are as per the Preferred Options analysis which identified that the impact on this objective will be determined by the locations of different types of industry. This should be mitigated through design and landscaping to minimise any adverse effects, particularly for residential communities in close proximity. |
| S3 | Improve the health and well being of the York population | ? | Comments are as per the Preferred Options analysis which identified that the effects upon this objective are associated with the types of industries which are present. There should be no deterioration for example in air quality which has adverse impacts on health. Developments should take consideration of the Low Emissions Strategy to be set for the city and any other contamination/ remediation standards /issues which may be detrimental to peoples health and well-being. |
| S4 | Safety and security for people and property | I | Comments stand as per the Preferred Options which state that encouraging and supporting the growth of the economy and jobs should decrease the unemployment rate and help to stabilise the economy over the lifetime of the plan to counter any downturn in economic experience currently. Also, health and safety on industrial sites is paramount and that development should also adhere to flood risk guidance to ensure security of any premises.. |
| S5 | Vibrant communities that participate in decision-making | O | Comments as per the Preferred Options analysis that identified there is no direct link between the policy and the objective. |
| S6 | Reduce the need to travel by private car | I | The intention to develop employment sites within the city centre and utilise existing brownfield sites in close proximity to the city centre /within the sub-regional centre as per this policy and the spatial strategy, will be positive for this objective as people will be able to utilise existing (and in the future, new and enhanced) public transport modes and networks to access businesses and employers. The SA is cautious over the delivery of employment site on the periphery of the sub-regional area as this may increase car trips. The development at Northminster Business will need to be better connected to public transport routes should it be developed in order to minimise people travelling to site by car. The transport policy aims to build a park and ride in close proximity and the SA would suggest that without this, the site may adversely impact on reducing people use of their car. The policy also aims to support rural diversification |

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| | | | schemes which may also conflict with this objective as there will be a reliance on the car for access given that alternative modes to the car are less frequent or not available. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | ? | The intention to develop employment sites within the city centre and utilise existing brownfield sites in close proximity to the city centre /within the sub-regional centre as per this policy and the spatial strategy, will be positive for this objective as people will be able to utilise existing (and in the future, new and enhanced) public transport modes and networks to access businesses and employers. The SA is cautious over the delivery of employment site on the periphery of the sub-regional area as this may increase car. The development at Northminster Business will need to be better connected to public transport routes should it be developed in order to minimise people travelling to site by car. The transport policy aims to build a park and ride in close proximity and the SA would suggest that without this, the site may adversely impact on reducing people use of their car. The policy also aims to support rural diversification schemes which may also conflict with this objective as there will be a reliance on the car for access given that alternative modes to the car are less frequent or not available |
| S8 | A transport network that integrates all modes for effective non-car based movements | I | There is no direct link between this policy and the objective as it will not deliver transport itself. However, locating new development within the sub-regional area primarily will located development in areas where there is the availability of alternatives modes of transport to the car. Development may also act as a catalyst to more frequent transport if it is a large development. The SA identifies that the policy now does not explicitly include for freight transportation management. The SA considers that this is an important element in light of the expectations for the York economy to grow but also to balance with other environmental considerations. |
| S9 | Quality affordable housing available for all | I | Whilst this policy will not directly effect this objective, the provision of jobs and economic growth can influence housing demand and development. A potential conflict was identified at Preferred Options between job growth exacerbating housing need relating to affordability and access to affordable homes. The provision of suitable housing is crucial for supporting the needs of the work force and economic growth so a strong link to policies CS6 and CS7 has been identified. |
| S10 | Social inclusion and equity across all sectors | + | The intention to support commercial business, education and tourism in York will help to provide a variety of jobs which should caters for all skills available within the city. This will help with equity of access to jobs and cater for the diverse skills base in York. |

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| EN1 | Land use efficiency that maximises the use of brownfield land | +/I | This policy directly meets this objective through aiming to deliver the majority of strategic developments on identified brownfield sites. Sites that have been identified: The city centre, Hungate, Terry's, Nestle and York Central are mixed use developments adjacent to or in close proximity of the city centre. Incorporating business uses on these sites is positive is maximising the sites ability to deliver a sustainable development although the SA acknowledges that there are competing uses on site. In deciding the amount that can be delivered, it will be paramount that a balanced approach is taken so to provide a quality mixed use development incorporating a good combined mix of employment, housing, leisure and openspace etc. There is some conflict in the provision of sites at Northminster and Monks cross given that these are greenfield sites. Although they do not the meet this objective, they do meet other objectives in this SA but their development will need to minimise any environmental impacts incurred through their development. |
| 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 | The impact upon this objective will depend upon the type, scale and location of development. All development should comply to strong design and buildings standards which should take into consideration the sites setting, surrounding built character and if the proposed use is suitable in order to achieve this objective. Further analysis is provided within the Heritage Impact Assessment which should be read in conjunction to this SA. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | I | Where sites for employment development have identified biodiversity of high value or are in proximity to sites of high value, every effort should be made by the development to maintain the integrity of the habitat in order to minimise any adverse effects on this objectives. Landscaping on the site could take account and incorporate the natural environment as protection. The development of sites outside of the urban area may have a particular effect on this objective through loss of open land. The biodiversity audit and accompanying action plan framework should be used in determining effects on individual sites. The Habitat Regulation Assessment (HRA) for the Core Strategy and Allocations SA and HRA documents will pick this issue up in more detail for sites of local, national and international importance. |
| EN4 | Minimise greenhouse gas emissions and develop a | | Employment development should be subject to strong sustainable design and construction guidelines, such as BREAM and other principles set out in the |

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| | managed response to the effects of climate change | | <p>forthcoming design and construction SPD. Development should include incorporation of energy efficiency measures, renewable energy generation, water management and waste processing in order to fulfill achieve this objective. Where businesses are retrofitting or interested in becoming more sustainable, guidance could also be provided or promotion of energy and resource solutions undertaken to further assist in helping the economy meet this objective.</p> <p>The location of development primarily in the sub-regional centre and mostly within or in close proximity to the city centre allow the use of existing transport routes and therefore should also help to reduce carbon emissions related to private car use through commuting. Given the scale on anticipated job growth it will also been paramount that any development where there is a lack of public transport, cycling or walking access, it should be provided in order to continue to make a positive contribution to the objective.</p> |
| EN5 | Improve air quality in York | | <p>Currently York has areas which are in breach of concentrations of different air pollutants and currently has two AQMAs in York in place for this reason. Air pollution is detrimental to peoples health and so improving this through the promotion and implementation of sustainable transport should be positive for this objective and the economy with a healthy and able workforce. Another issue to take into consideration is that traffic flows during peak periods result in increased pollutant concentrations throughout the day and subsequently results in higher annual average nitrogen dioxide concentrations. Therefore reducing peak traffic flow through the capturing commuters through new or enhanced Park and Ride facilities as well as through behavioural change should combine to be positive in improving air quality as peak times in the day but the SA is cautious about how the development of the vast majority of employment sites will have in terms of an in-combination effect. The SA suggests that this policy references the Air Quality policy and Low Emission Strategy as they will need to work in combination with each other.</p> |
| EN6 | The prudent and efficient use of energy, water and other natural resources | | <p>Comments stand as per the Preferred Options analysis which states that the achievement of this objective will largely be dependant upon implementation. It will be determined through it adherence to design and construction standards and the incorporation of energy efficiency measures, renewable energy generation, water management and waste processing.</p> |
| EN7 | Reduce pollution and waste | | <p>Comments stand as per the Preferred Options analysis which states that there is an</p> |

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| | generation and increase levels of reuse and recycling | | inevitable link between economic growth and waste and pollution levels in the city, particularly in conjunction with other new developments. New development should adhere to the processing commercial and domestic waste as per the Waste policy set out in the Core Strategy. |
| EN8 | Maintain and improve water quality | | Comments stand as per the Preferred Options analysis which identified that there may be a potential impact on water quality to due to the by-products of some industrial processes. However, the extraction and quality of the rivers are controlled by licensing and permits but planning will play a part in directing development away from the most sensitive areas. |
| EN9 | Reduce the impact of flooding to people and property in York. | | Comments stand as per the Preferred Options analysis which stated that that it is important to locate employment development where there is not a high risk of flooding or where development is likely to have adverse effects on flooding in York. |

Policy CS17: Distribution of Retail Growth

The Local Development Framework (LDF) will support the vitality and viability of the City Centre, with the central shopping area continuing to be the primary focus for new comparison goods retail development. This will be achieved through the following:

i. future retail development will be phased as follows:

Phase 1: Central Shopping Area

Pre 2020, priority will be given to developing the Castle Piccadilly area and the Stonebow area for comparison retail (approximately 28,000 sq m net) and developing these as extensions to the central shopping area.

Phase 2: York Central

Post 2020, the next priority will be on the York Central strategic allocation (part of the York Northwest corridor), and it is anticipated that between 20,000 and 25,000 sq m net comparison floorspace could be supported in this location subject to detailed impact testing;

- ii. other out of centre retail development will need to be considered in light of the sequential approach and the impact on existing centres and retail allocations; and
- iii. convenience retail development will be directed to the City Centre, Acomb and Haxby District Centres and smaller centres (within other large villages, villages and small villages as well as neighbourhood centres) at an appropriate scale. This will include between 200 and 600 sq m gross to support a new local centre on the former British Sugar/Manor School site, subject to retail impact assessment.

No additional Analysis undertaken.

Policy CS18: Strategic Transport Priorities

The Local Development Framework (LDF) will ensure sustainable growth and development through the following:

i. The Location of Development

New development will be required to be in locations which are (or can be) well served by public transport, accessible by walking and cycling and have good access to a range of local facilities. The layout of sites should also give high priority to the needs of pedestrians, cyclists and public transport users.

ii. Strategic Infrastructure Improvements

The LDF will deliver the phased infrastructure programme outlined below to ensure that the growth levels identified in the plan can be delivered in an appropriate way. Infrastructure improvements will be progressed in association with measures to promote sustainable travel to minimise the generation of new trips taking up the additional road capacity. The list identifies the principal strategic schemes which need to be delivered – many smaller projects with more local impact will also be required.

PHASE 1: 2011 - 2015:

Access York Phase 1

- Provision of new Park & Ride sites at Poppleton Bar (A59) and at Clifton Moor (B1363) (as identified on the Key Diagram).
- Relocation and enlargement of the existing Park & Ride site at Askham Bar (A1036) (as identified on the Key Diagram).
- Enlargement to the A59/A1237 roundabout to increase capacity.
- Provision of an improved pedestrian/cycling crossing of the Outer Ring Road at the A59 junction.

Bus Network Improvements

- Bus priority measures on A59 and Wigginton Road corridors (as part of Access York Phase 1 project or subsequent investment programmes).
- Targeted junction enhancements to improve reliability, as set out in the Local Transport Plan 3 (LTP3) and subsequent investment programmes.

Strategic Cycling and Pedestrian Network Improvements

- Improvements to the strategic cycling network as set out in the LTP3 and subsequent investment programmes.
- Extension of Footstreets area, to be progressed through the City Centre Area Action Plan.

Highway Network Capacity Improvements

- James Street Link Road Phase II road improvement scheme.

PHASE 2: 2016 – 2021:

A1237 Outer Ring Road Improvements

- Improvements to the highest priority congested A1237 Outer Ring Road roundabouts to be identified in the LTP3.
- Further improvements to other A1237 Outer Ring Road junctions.

Bus Network Improvements

- Improvements to the bus interchange at the railway station.
- Further bus network improvements to be identified in the LTP3 and subsequent investment programmes.

Strategic Cycling and Pedestrian Network Improvements

- Restrict access for private motorised vehicles across City Centre bridges, to be taken forward through the City Centre Area Action Plan.
- New cycling/pedestrian bridge near Scarborough Bridge.
- Continued implementation of the strategic cycling network as set out in the LTP3 and subsequent investment programmes.

PHASE 3: 2022 – 2031:

A1237 Outer Ring Road Improvements

- Series of selected link upgrades to dual carriage way standard (including grade separation) on the busiest sections of the Outer Ring Road (Wetherby Road to Clifton Moor).

Bus Network Improvements

- Further bus network improvements to be identified through the LTP3 and subsequent investment programmes.

Strategic Cycling Network Improvements

- Continued implementation of the strategic cycle network as set out in the LTP3 and subsequent investment programmes.

It is anticipated that the infrastructure measures could reduce the projected increase in citywide delays by approximately 40% by 2031 however additional measures may be needed to minimise localised unacceptable increases.

The LDF will also support the longer term ambitions to develop a new station at Haxby and improve rail provision along the Harrogate railway line

through the introduction of tram-train. This could include provision for a rail halt within the Former British Sugar/Manor School Strategic Allocation.

iii. Smarter Choices and Demand Management for Travel

In accordance with the principles of the LTP3 the Council will deliver a sustained travel behaviour change programme, supported by low cost infrastructure and service improvements with the aim of achieving at least a 35% reduction in projected traffic delays by 2031. This will be delivered by a range of interventions including demand management, bus subsidy and sustainable travel promotion that will manage the increasing demand for travel into and within all parts of York. A critical element of demand management will be restricting the availability and cost of parking in existing areas and new developments. Further measures to improve the public transport offer will be progressed through the LTP3, such as cross ticketing between different transport providers.

iv. Protection for Residential Areas and City Centre Accessibility

To ensure that the quality of life of residents in existing areas of the City is not adversely affected by development growth access restrictions to discourage through traffic will be implemented. The areas requiring protection measures will be identified through the LTP3 and as part of the consideration of individual development sites.

To improve the City Centre and encourage economic activity, further City Centre transport schemes may be necessary to respond to the City Centre Area Action Plan and the outcomes of the City Centre Movement and Accessibility Framework.

v. Strategic Allocations and Future Areas of Search for Urban Extensions

A transport masterplan will be prepared for the York Northwest Corridor which will outline the package of transport infrastructure measures and interventions required to access and deliver the two strategic allocations.

Should urban extensions be required, a detailed master planning process will be undertaken for each area which will identify the specific transport infrastructure necessary to access and deliver the sites.

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| | <p>Headline objective: Reduction of York’s Ecological Footprint</p> | <p>+/I</p> | <p>The revised transport strategy sets out upfront its role in ensuring sustainable growth and development through locating development in accessible locations, improving the transport infrastructure and implementing smarter choices and demand management initiatives. Each of these elements should work towards achieving the objective to reduce York’s ecological footprint. Elements regarding infrastructure improvements have been carried forward from the Preferred Options stage but have been more clearly defined in what and where this will be set out. Further to this, the policy states under this section that “infrastructure improvements will</p> |
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| | | <p>be progresses in association with measures to promote sustainable travel to minimise the generation of new trips taking up the additional road capacity”. This is positive in helping to reduce car emissions and resource use through fewer trips, both of which feed into the footprint. It has been identified that there is a potential conflict between improving infrastructure and use of the car due to the road improvements stated. Although it will reduce congestion, the easier it is to drive around the city, the more people will want to and so could have the opposite effect of increasing trip generation by motor vehicles. The SA anticipates that some of this will be offset through the intention and overt acknowledgement for improvements to the bus and strategic cycling and pedestrian networks as well as the enhancing of York’s Park and Rides. The SA welcomes this change from the previous policy to include improvements to these networks throughout each time phase in order to continually encourage people to use sustainable transport routes throughout the lifetime of the plan and into the future. This will also work in conjunction to section 3 of the policy which states that “the Council will deliver a sustained travel behaviour change programme... with the aim of achieving at least a 20% reduction in projected traffic delays”. The success of this policy will be able to be measured in terms of peoples transport footprint which should lower if it is successful. It could also form part of a targeted campaign in order to achieve both the policy and this objective. However, the SA suggests that links are made to cross reference the environmental and social benefits from reducing trips and delays to positively reinforce this message. The SA acknowledges that the Park and Ride schemes provide a positive service through capturing residents and visitors from travelling into town but do rely for most people on an initial car journey to the site. This policy could be extended to help promote alternatives to the car in reaching the city. The longer-term plan for a tram-train would help to make this more effective by linking together the Park and Ride with the city centre, encouraging fewer vehicle trips.</p> <p>A new element in this policy to plan development which is accessible by walking and cycling to local facilities is positive in terms of limiting trips by private car. This will also have an positive impact on this policy but will be determined upon implementation and through monitoring.</p> <p>The SA also welcomes the inclusion for masterplanning for transport should the strategic</p> |
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| | | | allocations and extensions be developed. The SA envisages that this should support the overall sustainable drive to reduce emissions and promote the use of sustainable and low emission technologies in these areas. At this strategic level the SA would like to set out that this has the potential to not adversely impact on the overall carbon emissions and eco footprint. Where there is conflict with this, mitigation should undertaken to minimise any additional emissions from these areas. More detailed analysis will be undertaken alongside the production of the masterplanning process. |
| EC1 | Good quality employment opportunities for all | ○ | There is no direct link between this policy and the objective |
| EC2 | Good education and training opportunities for all which build the skills of the population | ○ | There is no direct link between this policy and the objective |
| EC3 | Conditions for business success, stable economic growth and investment | +/I | <p>Previous comments at the Preferred Options stage recognised that an effective transport network is key to successful business and investment. It allows commuters to travel to and from work as well as enabling visitors and commercial traffic into, around and out of the city. The Strategic Infrastructure Improvements set out in this revised policy will be especially important for this. In particular, the park and ride schemes, bus enhancements and ring-road improvements should help to meet this objective. The SA acknowledges that this policy no longer includes text specifically for coach parking improvements and extended rail links, which it supported previously. Both of these would enable easier transit into the city from elsewhere for economic reasons. It is recognised that some of the detail for this policy will be set out by the Local Transport Plan. This will under go a separate SA process.</p> <p>In addition to this, section 4 overtly states that in order to improve the city centre and encourage economic activity, further improvements may be outlined after the completion of the City Centre Area Action Plan. This shows direct support for this objective.</p> <p>Evidence base work shows that some roads in the city are reaching capacity and that that the infrastructure improvements stated will need to be undertaken to ensure an effective transport network in the future based upon the strategic sites outlined in the Core Strategy. The implications for the economy exist particularly at peak times of the day when people are travelling to or from work or for commercial purposes. A major influence on this will be the</p> |

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| | | | location of any other major development sites, including the potential urban extensions, and the amount of development they result in. The potential urban extensions to the east of the city have been identified in locations which the transport modelling evidence base deem to be the most suitable given the existing infrastructure available and the capacity to improve and implement other schemes. The SA welcomes as part of this chapter that the masterplanning of these sites should they be taken forward so that consideration can be given for new key commuting and travelling routes to employment areas from or to these locations. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | ++ | This policy directly meets this objective through section 1. This denotes that new developments need to be well served by public transport, accessible by walking and cycling and have a good range of local facilities. This will be particularly important for the development of the strategic allocations and, in the future, the potential urban extensions. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | + | Comments stand as per the Preferred Options. This stated that at the heart of this policy is accessibility across York in a sustainable which has positive connotations for this objective. |
| S2 | Maintain or reduce York's existing noise levels | ?/! | There is an inevitable link between transport and noise. Improvements to transport should consider the impacts of noise and mitigate its effects as far as possible in order to limit adverse effects on residents and businesses. The policy encourages reduced vehicle movements and where this is successful there should be a positive localised effect on noise. Noise impact assessments may be required to more fully understand the implications of some of the improvements suggested to coordinate an approach to mitigation. |
| S3 | Improve the health and well being of the York population | ? | Currently York has areas which are in breach of concentrations of different air pollutants. Air pollution, particularly from motor vehicles, is detrimental to people's health and so improving this through the promotion and implementation of sustainable transport should be positive for this objective. The SA particularly supports the improvements to the cycle and pedestrian networks in order to achieve this as this will promote activity and fitness whilst travelling. There could be more crossover to link this with Green Infrastructure as pleasant and safe surroundings combined with efficient routes help in the uptake of these travel modes. There are also strong linkages with the Air Quality Strategy in this policy which should be made known, perhaps in the justification. |

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| S4 | Safety and security for people and property | I | Safety on public transport routes is paramount to making sure peoples wish to use them. This is particularly relevant for cycle and pedestrian routes. No further information is provided on these and the SA anticipates this will be set out in the LTP. Where there are new facilities, such as Park and Rides, CCTV should be used to act as a deterrent to crime. |
| S5 | Vibrant communities that participate in decision-making | O | There is no direct link between this policy and the objective |
| S6 | Reduce the need to travel by private car | ++/I | <p>This policy should directly meet this objective. The primary focus of the policy is to encourage a modal shift away from use of the private car. The revised policy strengthens this approach through section 3 regarding “Smarter Choices and Demand Management for Travel”. This section sets out the Council’s intention to “deliver a sustained travel behaviour programme supported by low cost infrastructure and service improvements with the aim of achieving a 20% reduction in projected travel delays by 2031”. This statement should directly work towards meeting this objective. Further to this, the intention to limit parking and change the costing structure for this will have a direct impact on this objective. This will make people more aware of using their car and should help to influence them in using an alternative mode of transport.</p> <p>Sections 1 and 2 also support this objective. Section 1 aims to focus new development in accessible locations reducing the need to travel by car to local facilities. Section 2, regarding infrastructure improvements, includes improvements to cycle and pedestrian networks as well as buses. The new park and rides schemes will also help to capture people travelling to York and reduce the need to travel into the city centre by private car. The SA does acknowledge 2 potential conflicts however. The SA also acknowledges that the Park and Ride schemes provide a positive service through capturing residents and visitors from travelling into town but do rely for most people on an initial car journey to the site. This policy could be extended to help promote alternatives to the car in reaching the city. The longer-term tram-train initiative could provide a solution for this in helping to sustainably transport people on a frequent basis but a solution will need to be applied in the short-term to medium term. The road improvements must also be queried by the Sustainability Appraisal. Whilst these will reduce congestion, the easier it is to drive around the city, the more people may want to and so could have the opposite effect of increasing trip generation by motor vehicles. Any benefits seen in the short-term for the travel, the economy and potentially air, quality will be lost in the long-</p> |

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| | | | term through uptake of vehicles of the roads. In addition to this, it will be important that the strategic allocations and potential future urban extensions promote sustainable travel to and from the site as well as within it to ensure it minimise the needs to use a private car. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | ++ | This revised policy will now directly meet this objective. The aim of section 1 of the policy is to locate new development in locations which are well served by public transport routes, are accessible by walking and cycling and have access to a good range of local facilities. Furthermore, the policy now includes section five which denotes the importance of masterplanning in the infrastructure requirements for the strategic allocations and potential urban extensions. These sites are additional to the preferred options policy and the SA welcomes the specific consideration for these sites within the transport policy to ensure comprehensive planning and travel management on the sites. The specific requirements set out for these sites will be also subject to further SA. |
| S8 | A transport network that integrates all modes for effective non-car based movements | + | The policy aims to provide a comprehensive approach to all forms of transport within York. The primary approach is to encourage a behavioural change through the implementation of sustainable modes of transport. The revised policy talks of “network” improvements for various travel modes which is positive in providing citywide connectivity and effective non-car based movements. The SA also support the Park and ride schemes as this will capture people travelling into the city. The SA does acknowledge that for the majority, this will involve car travel to reach the P&R but it will limit adverse impacts on the inner city network and allow this to be more effective. The policy has included intentions for rail links and tram-train connectivity in the longer-term, which will also be positive in creating a new frequent route serving the west of the city. Whilst the SA supports the realistic and deliverable nature of the policy, the policy should include references to the importance of the railway station and its role in York’s future. The SA acknowledges that this will also be captured through the City Centre AAP and the York Central SPD. The CCAAP will also capture in more detail the movement strategy intended to work for the city centre. This is subject to a separate SA. |
| S9 | Quality affordable housing available for all | O | There is not direct link between this policy and the objective. |
| S10 | Social inclusion and equity across all sectors | +/I | The successful delivery of this policy should make all types of facilities and locations across the city more accessible via a variety of modes. This will be positive in working towards this objective. |

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| EN1 | Land use efficiency that maximises the use of brownfield land | O | There is not direct link between this policy 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 | ? | <p>Many aspects of this policy should help to preserve the character of the city by limiting the amount of private vehicle traffic within the city centre. The main driver of the policy is to enhance alternative options to the car via sustainable modes including buses, cycling and walking. Reduction in the number of vehicles to the city centre in particular will reduce its impact on the historic infrastructure network as well as enhancing the overall experience of the city, which is unique in nature. One of the main aspects of this would be to reduce the number of commercial vehicles in the city centre. Currently the policy does not specify any detail of this but it is anticipated that it may be picked up in the CCAAP. Further analysis of this will need to be undertaken in this document for this point. The SA also acknowledges that a balanced approach will need to be taken with regards to the environmental effects of new schemes and improvements on the character and setting of the city against the benefits they achieve in limiting vehicular traffic. This should be a significant consideration for any masterplanning of major sites, including the potential urban extensions, and subject to further impact assessment.</p> <p>A Heritage Impact Assessment has been undertaken for the Core Strategy and should be read in conjunction with this document.</p> |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | -/I | Comments stand as per the Preferred Options analysis. This identified that whilst the improvements to transport will improve accessibility to the natural environment, there may be conflicts with the location of potential improvements for conservation reasons. This will be particularly important for the development of new park and ride schemes, the strategic allocations and potential urban extensions. The effects of this will be through an assessment of the landscape and comparisons to evidence base, such as the biodiversity audit. Where conflicts are identified, mitigation measures should be enforced to maintain the integrity of the environment for biodiversity. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | I ST + LT | The successful implementation of this policy should be positive for this objective in reducing greenhouse gas emissions and more effectively managing an main element which lead to climate change. The overall aim of encouraging a sustained modal shift away from the use of a car to use an enhanced bus, cycle and pedestrian network should help deliver the Council's |

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| | | | <p>aim to be a leading environmentally friendly city. Cycle path and pedestrian routes will be particularly important for this. Further to this, the policy states under section 3 that “infrastructure improvements will be progressed in association with measures to promote sustainable travel to minimise the generation of new trips taking up the additional road capacity”. This is positive in helping to reduce car emissions and resource use through fewer trips, both of which are positive for this objective. It has been identified that there is a potential conflict between improving infrastructure and use of the car due to the road improvements stated. Although it will reduce congestion, the easier it is to drive around the city, the more people will want to do so and could have the opposite effect of increasing trip generation by motor vehicles. The SA anticipates that some of this will be offset through the intention and overt acknowledgement for improvements to the bus and strategic cycling and pedestrian networks as well as the enhancing of York’s Park and Rides. The SA suggests that the effectiveness of this policy will be through implementation in the short-term and positive for the long-term. Furthermore, how successful the policy is in relation to this objective will be determined upon the masterplanning of suitable sustainable infrastructure in the strategic allocations and, when required, the potential urban extensions.</p> |
| EN5 | Improve air quality in York | ?/I | <p>Currently York has areas which are in breach of concentrations of different air pollutants and currently has two AQMAs in York in place for this reason. Air pollution, particular from motor vehicles, is detrimental to peoples health and so improving this through the promotion and implementation of sustainable transport should be positive for this objective. In terms of air quality, the implementation of the policy must consider vehicle types and fuels choices in order to make a positive impact on air quality as just reducing the vehicular traffic may not be adequate. With respect to this, commercial traffic should also be considered. Another issue to take into consideration is that traffic flows during peak periods result in increased pollutant concentrations throughout the day and subsequently results in higher annual average nitrogen dioxide concentrations. Therefore reducing peak traffic flow through the capturing commuters through new or enhanced Park and Ride facilities as well as through behavioural change should combine to be positive in improving air quality as peak times in the day. The SA suggests that this policy references the Air Quality policy and Low Emission Strategy as they will need to work in combination with each other.</p> |
| EN6 | The prudent and efficient use of energy, water and other natural | I | <p>Reducing the use of the car will have benefits on the consumption of fuel. There should be consideration for public transport vehicles and the types of fuel they use to make sure they</p> |

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| | resources | | are efficient. The SA anticipates that this level of detail is included within the LTP. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | O | There is not direct link between this policy and the objective |
| EN8 | Maintain and improve water quality | O | There is not direct link between this policy and the objective |
| EN9 | Reduce the impact of flooding to people and property in York. | I | Any new improvements to infrastructure should use sustainable construction materials to allow permeability in order to minimise any adverse effects on fluvial or pluvial flooding. |

Policy CS19: Air Quality

The LDF will reduce emissions to air and improve air quality within existing Air Quality Management Areas (AQMAs). Areas where monitoring has shown elevated levels and across the City of York Council area as a whole are shown at Figure 16.1. During the lifetime of the plan, areas of air quality concern will change over time. Where air quality monitoring in the City highlights elevated levels of pollution it may be necessary to declare further AQMAs.

Council will protect human health by improving local air quality and contribute towards York becoming the UK's first low emission city in the following way:

- i. development will only be permitted if the impact on air quality is acceptable and mechanisms are in place to mitigate adverse impacts and reduce further human exposure to poor air quality;
- ii. all minor and major planning applications are required to identify and assess potential air quality impacts through an assessment undertaken in accordance with the Council's Local Emission Assessment Methodology; and
- iii. all sites identified through the Allocations Development Plan Document (DPD) will be subject to an assessment of potential air quality impacts in accordance with the Council's Local Emission Assessment Methodology.

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| | Headline objective: Reduction of York's Ecological Footprint | + | This policy aims to help reduce air pollution, which in turn will help to meet the headline objective. Reducing the risk for decreasing air quality means that measures will be put in place to make sure new development will have a minimal impact. In turn, tackling air quality includes the decrease of carbon emissions and the measures put in place on each site to |
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| | | | tackle air quality, will help to reduce the carbon footprint of the city. The carbon footprint of York is significant for the eco-footprint and therefore this policy will help to work towards achieving this objective. |
| EC1 | Good quality employment opportunities for all | I | This policy may encourage air pollution or emission reduction specialists to York. The impact of this may be small but may grow depending on the implementation of the policy. |
| EC2 | Good education and training opportunities for all which build the skills of the population | O | There is no direct link between this policy and the objective. |
| EC3 | Conditions for business success, stable economic growth and investment | + | This policy will contribute to achieving this objective through the improvement of air quality which in turn will be positive for peoples health. The health of a workforce is a key component of business success. The implementation of different air quality measures may also draw investment into York based upon a low emission economy. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | I/? | Whilst this policy will not directly achieve this objective in terms of provision, improvements in peoples health due to air quality will have a direct impact on healthcare and the number of treatments needed locally. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | O | There is no direct link to this objective. |
| S2 | Maintain or reduce York's existing noise levels | O | There is no direct link to this objective. |
| S3 | Improve the health and well being of the York population | ++ | This policy will directly help to meet this objective. A serious cause of respiratory disease and other conditions is poor air quality. York also has 2 AQMAs for areas which have exceeded pollutants measures, namely nitrogen dioxide and also a number of areas which are close to exceeding acceptable levels of pollutants which this policy, in combination with transport policies, may help to address. As this policy aims to resist deterioration in air quality through new development, it is anticipated that there will be a positive impact on peoples health within York. |
| S4 | Safety and security for people and property | O | There is no direct link to this objective. |
| S5 | Vibrant communities that | O | There is no direct link to this objective. |

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| | participate in decision-making | | |
| S6 | Reduce the need to travel by private car | O | There is no direct link to this objective. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | O | There is no direct link to this objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | O | There is no direct link to this objective. |
| S9 | Quality affordable housing available for all | O | There is no direct link to this objective. |
| S10 | Social inclusion and equity across all sectors | O | There is no direct link to this objective. |
| EN1 | Land use efficiency that maximises the use of brownfield land | O | There is no direct link to this 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 | +/I | Good air quality will have a positive effect on the historic environment of York. Cleaner air will be positive to reduce degradation of buildings in terms of negative effects to building materials and discolouration. However, any mechanisms for air quality put in place will have to be sympathetic to the surrounding area. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | O | There is no direct link to this objective. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | I | This policy will directly contribute to this objective. Reducing greenhouse gas emissions is an integral part of this policy in the overall plan to reduce emissions. However, the policy and its justification should cross reference the Climate Change Strategy and Action Plan. |
| EN5 | Improve air quality in York | ++ | This policy will directly achieve this objective. The objectives for this policy are to protect human health and contribute towards York becoming the UK's first low emission city by improving air quality. The policy states that development will be resisted unless suitable low |

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| | | | emission and or air quality mitigation measures are put in place and can demonstrate where air quality is acceptable and mechanisms are in place to mitigate any adverse impacts. This will help to make sure that air quality is maintained and improved for the future. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | ○ | There is no direct link to this objective. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | +/I | This objective will help to reduce and mitigate air pollution arising from development. In combination with other policies within the Core Strategy, it should help to minimise the amount of new pollution too. |
| EN8 | Maintain and improve water quality | ○ | There is no direct link with this objective |
| EN9 | Reduce the impact of flooding to people and property in York. | I | Whilst this policy will not have a direct impact on this objective, a positive impact may arise from the decrease in carbon emissions through strategies and mechanisms implemented in new development. In the long-term this may help to mitigate additional flood risk impacts from Climate Change. |

Policy CS20: Strategic Green Infrastructure

- The LDF will conserve and enhance York's landscapes, geodiversity, biodiversity and natural environment, recognising the role of Green Infrastructure in supporting healthy communities, cultural value, a buoyant economy and aiding resilience to climate change. This will be achieved through the production of a Green Infrastructure Strategy, and by ensuring that development proposals relate to current and emerging guidance, and do not compromise York's Green Infrastructure network.
1. As a part of the LDF process, the Council will adopt a Green Infrastructure Strategy which addresses and incorporates the following:
 - the findings of an up to date Biodiversity Audit and Action Plan;
 - the findings of a Lower Derwent Valley Plan;
 - management plans to describe, protect and enhance the biodiversity of Council owned sites, with priority given to those designated as Sites of Importance for Nature Conservation (SINCs);
 - protecting and enhancing existing open space in York, and seeking to increase provision in areas where a deficiency has been identified.

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| <p>This includes the provision of strategic open space in connection with areas of search for urban extensions, if required;</p> <ul style="list-style-type: none"> • ongoing work with landowners, and through the development process, to help safeguard nature conservation sites, whether locally, regionally, nationally or internationally identified, including the potential to create buffer zones. The extent of buffers would be variable, but should be commensurate to the need; • delivering the aspirations of partner strategy documents and action plans, such as the Regional Biodiversity Strategy, Regional Forestry Strategy and Action Plan, River Basin Management Plans, Priority Woodland Habitat Management Plans; • safeguarding, managing and enhancing York's existing tree and woodland resource in line with the current Regional Forestry Strategy, particularly urban tree planting and street trees; • maintaining and enhancing the rivers, banks, floodplains and settings of the Rivers Ouse, Derwent and Foss, and other smaller waterways for their biodiversity, cultural and historic landscapes, as well as recreational activities; and • supporting allotments and productive land, to encourage local food production, and its benefits to education and healthy living. <p>2. The LDF will support development which:</p> <ul style="list-style-type: none"> • ensures the retention, enhancement and appropriate management of features of geological, geomorphological, paleoenvironmental or biological interest, and address the requirements of the current biodiversity audit and action plan; • takes account of the potential need for a buffer zone around a wildlife site, to ensure the integrity of the site's interest is retained; • supports the creation, integrity and management of York's Green Infrastructure network, including its green corridors; • results in no net loss to, and helps to improve, biodiversity (any unavoidable impacts must be appropriately mitigated or compensated for , and secured through the planning process); • helps address current deficiencies in open, recreational and play space. Proposals should provide for the quantity, quality and accessibility of open space and ancillary facilities as set out in the current assessment of open space, and improve the provision where required. Development which results in the loss of open space will be refused; and • protects and enhances existing rights of way, national trails and open access land. | | | |
| | <p>Headline objective: Reduction of York's Ecological Footprint</p> | + | <p>Comments stand as per the Preferred Options analysis which identified that retaining Green Infrastructure will have a principle role in reducing the ecological footprint and making sure it doesn't increase through maintaining green assets. Green infrastructure plays an important role in not only maintaining biodiversity but also through encouraging people to use the network for walking and cycling. As sustainable transport corridors it will help to lower the transport footprint and sustainable movement around the city. Green assets can also act as carbon sinks, which is beneficial for the ecological footprint.</p> |

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| EC1 | Good quality employment opportunities for all | ○ | Comments stand as per the Preferred Options analysis which state that there is no link between this policy and the objective |
| EC2 | Good education and training opportunities for all which build the skills of the population | ○ | Comments stand as per the Preferred Options analysis which state that there is no link between this policy and the objective |
| EC3 | Conditions for business success, stable economic growth and investment | + | Maintaining and enhancing York's Green Infrastructure is an important step to preserving the character and setting of the city and its historic assets. This is therefore important for tourism and making the area attractive for business in terms of investment. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | ++ | Comments stand as per the Preferred Options analysis which stated that accessible recreational space in close proximity to where people live is crucial for the population. The policy will ensure that existing rights of way will be protected and enhanced which is positive in term of accessibility and connectivity. The council welcomes the policy addressing current deficiencies in open, recreational and play space through new developments. This will be important in order to enhance accessibility and make sure that new development does not adversely effect existing space. Furthermore, the identification of strategic openspace in line with the areas of search for urban extensions should ensure that the developments enhance provision and do not put undue stress on existing facilities. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | ++ | Comments stand as per the Preferred Options analysis which stated that accessible recreational space in close proximity to where people live is crucial for the population. The policy will ensure that existing rights of way will be protected and enhanced which is positive in term of provision, accessibility and connectivity. The council welcomes the policy addressing current deficiencies in open, recreational and play space through new developments. This will be important in order to enhance accessibility and make sure that new development does not adversely effect existing space. Furthermore, the identification of strategic openspace in line with the areas of search for urban extensions should ensure that the developments enhance provision and do not put undue stress on existing facilities. |
| S2 | Maintain or reduce York's existing noise levels | +/l | Comments are as per the Preferred Options analysis which state that whilst there is no direct link to this objective, the policy could be used as an effective way to mitigate noise issues arising from roads or industry. Green Infrastructure could prove positive for this objective therefore by mitigating local noise. |
| S3 | Improve the health and well being of the York population | ++ | Comments stand as per the Preferred Options analysis. Green Infrastructure positively influences health and well-being through the provision of green assets as recreational space. |

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| | | | It allows sports and enjoyment as well as a healthier lifestyle. The SA also agrees with the use of the ANGst model for monitoring purposes as this focuses on how openspace can be beneficial for health and well-being. Protecting, enhancing and addressing deficiencies should provide better access to openspace and recreational areas enabling more physical activity which would be beneficial for this objective. This policy also aims to retain public rights of way which includes cycle and foot paths, which is positive in providing a platform for physical activity. The management of green assets not only provides environmental benefit but is proven to be positive for overall well-being through the presence of wildlife and trees. |
| S4 | Safety and security for people and property | O | There is no direct link between this policy and the objective. |
| S5 | Vibrant communities that participate in decision-making | O | Comments stand as per the Preferred Options analysis which state that there is no link between this policy and the objective |
| S6 | Reduce the need to travel by private car | +/I | Comment stand as per the Preferred Options analysis which identified that connectivity between York's Green Infrastructure into a network will help to provide a pleasant environment and should encourage people to walk and cycle over using their car. Increasing accessibility between openspaces and recreational areas will also allow for a reduced need to travel by car. In order to strengthen this policy against this objective, the SA suggests that there be a cross reference in the policy to determine this as a purpose of GI. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | + | This policy states that working with the developer they will determine how GI can be incorporated into each site. The SA supports this approach as it will help to enhance and continue the network of green assets throughout the city. Connectivity throughout the network is key in order to encourage walking, cycling and use of the space for recreational purposes. Furthermore, the policy states that the provision of new strategic openspace will be provided in line with the potential development of urban extensions in the future. The policy also promotes that the existing public access routes will be retained and there is the potential for this to be expanded in line with the creation of new openapce areas. In order to strengthen this policy against this objective, the SA suggests that there be a cross reference in the policy to determine this as a purpose of GI. |
| S8 | A transport network that integrates all modes for effective non-car based movements | I | Comments stand as per the Preferred Option stage which specifies that the green infrastructure helps to link routes across the city for walking and cycling. It would be beneficial for this policy to have more detail or a cross reference to Green Infrastructures role with regards to accessibility and sustainable transport. |

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| S9 | Quality affordable housing available for all | O | Comments stand as per the Preferred Options analysis which state that there is no link between this policy and the objective |
| S10 | Social inclusion and equity across all sectors | I | Increasing and retaining existing openspace and green assets will help towards equity of access across the city and help address areas of deficiency identified in the evidence base. |
| EN1 | Land use efficiency that maximises the use of brownfield land | + | Comments stand as per the Preferred Options analysis. This identifies that the compact nature of the urban form does increase pressure on greenspace, particularly on small scale local spaces. It has been identified that greenspaces are important for the health and well-being of residents as well as for resilience to climate change. Whilst the policy does not relate to brownfield land, the SA considers that the inclusion of green space within planning permissions is an essential element of creating a sustainable community. In addition to this the identified of areas of search for potential urban extensions will require the implementation of new strategic openspace. This should help to alleviate any further pressure on existing openspace in the near vicinity should the sites come forward for development. |
| 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 policy recognises that in order to maintain and enhance York's landscape character and setting alongside other factors, it is critical that open spaces, green space, the waterways and other assets are retained and maintained. These feature extensively in determining the character of York. The city centre for example has established historic parks and gardens as well as more natural green space adjacent to the city walls and the Strays and lngs form wedges of natural space into the urban area. It is possible that enhancing the network of spaces as well as biodiversity will continue to add to the character of York and improve the quality of York overall. The SA welcomes the policy's inclusion for the historic landscape connected to the waterways is included but would like this acknowledgement for other green infrastructure assets as well. This could be strengthened within the policy. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ++ | Comments stand as per the Preferred Options Analysis. This policy directly achieves this objective. The intention of this policy is to conserve and enhance the natural environment to be biodiverse and attractive to people, flora and fauna. The revised policy is split into 2 sections, one concentrating on the main priorities and the other relating to requirements for developments. The SA supports this approach as it details how the Council aims to protect and enhance the environment from protecting and providing openspace through to management of the natural environment. This will be taken forward in more detail through a Green Infrastructure Strategy which will discuss priorities in more detail and an implementation/delivery strategy. The SA still identifies the potential for conflict between |

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| | | | biodiverse environments and it being used for recreational purposes. The GI Strategy will need to highlight management of areas and strategies for making sure human interaction is limited to areas where it will not endanger the biodiversity on site. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | + | Comments stand as per the Preferred Options analysis which stated that well designed, flexible public space are crucial in making towns and cities resilient to climate change. Spaces that are softer, greener, more organic and natural will store water and help to mitigate flood risk as well as help to modify urban temperatures. The use of multifunctional greenspace should be incorporated into the Green Infrastructure strategy in order to provide recreational opportunities but also a functional role in making York resilient to climate change or its associated effects, such as flooding. The SA does welcome an acknowledgement in the policy as “aiding resilience to climate change” but thinks this could be expanded and related to the benefits from water storage, temperature moderation for example.. |
| EN5 | Improve air quality in York | + | Green infrastructure can have a role to play in terms of improving air quality. The SA acknowledges that should flora be used as a mitigation tool certain species will be required to maximise the effectiveness of removing pollutants from the air. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | +/l | Comments stand as per the Preferred Options which stated that green Infrastructure does have a role to play in conserving energy use in buildings by providing essential shade to buildings and mitigating the effects of urban heat islands created through prolonged periods of high temperatures. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | O | Comments stand as per the Preferred Options analysis which state that there is no link between this policy and the objective |
| EN8 | Maintain and improve water quality | ? | Comments stand as per the Preferred Options analysis. The revised policy still includes the intention to “ensuring that the Rivers Ouse, Foss and Derwent and other smaller waterways are maintained and enhanced for biodiversity as well as recreational activities”. The SA still recognises the potential conflict in enhancing the waterways for biodiversity alongside recreational purposes whilst also acknowledging their cultural and historic value. The specifics of how this is intended to be taken forward should be included within the GI strategy with an EIA assessment of any areas which may be effected. |
| EN9 | Reduce the impact of flooding to people and property in York. | + | Comments stand as per the Preferred Options analysis, which identify that greenspace is useful for flood mitigation through allowing areas to flood as well as enhancing water storage capacity. This does not have to be confined to large areas but could also include green roofs, |

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| | | | green walls and soft borders. It was considered that this would have a positive impact on reducing flood risk therefore. |
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Policy CS21: Sustainable Design and Construction

The LDF will play a key role in helping to deliver the Climate Change Framework and Action Plan through contributing to a reduction of York's carbon & eco-footprint and helping the city to adapt to, and mitigate against climate change. This will be achieved through ensuring York's renewable energy / low carbon potential is realised and high standards of sustainable design and construction are adopted.

1. Renewable Energy

- i) The LDF will ensure that the following renewable energy targets are exceeded through either on-site or off-site production:
- 38.7MW of installed renewable electricity capacity and 15.1MW of installed renewable heat capacity by the year 2020; and
 - 39.8MW of installed renewable electricity and 18.0MW of installed renewable heat capacity by the year 2031.

All proposals must be in accordance with the spatial principals SP1 and SP2 identified and broad spatial locations highlighted in Table b below.

- ii) All major developments (more than 10 dwellings or 1000m² non-residential floorspace) must submit a Sustainable Energy Statement as part of the planning application process. Unless it can be demonstrated that it is not feasible or viable, proposals must:
- incorporate onsite renewable energy / low carbon energy generation equipment to off-set at least 10% of predicted carbon emissions; and
 - integrate CHP and district/block heating or cooling infrastructure.

2. Sustainable Design and Construction

All new residential and non-residential developments including conversions and change of use must submit a Sustainability Statement (where appropriate incorporating a Sustainable Energy Statement) as part of the planning application process. The Sustainability Statement will need to demonstrate that the development will be a high standard of sustainable design and construction using innovative techniques to ensure building design reduces energy consumption and construction maximises sustainable use of resources.

For development proposals of 10 dwellings or more or non residential schemes over 1000m² the following standards will apply, unless it can be demonstrated that it is not feasible or viable:

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| <ul style="list-style-type: none"> • Residential Developments: - Code for Sustainable Homes Level 3 (or equivalent), and zero carbon status from 2016 onwards; and • Non-Residential Developments: - 'very good' standards as set out in the Building Research Establishment Environmental Assessment Method BREEAM, and zero carbon from 2019 onwards. | | | |
| | Headline objective: Reduction of York's Ecological Footprint | ++ | Comments stand as per the Preferred Options Analysis. This objective of this policy is to promote a reduction in York's carbon and eco-footprints to help adapt to, and mitigate against climate change through sustainable design and construction. It will therefore directly meet this objective by ensuring developments incorporate renewable energy and sustainable design and construction standards appropriate to the type and scale of development. More information will be included within the SPD as to how this will be achieved. |
| EC1 | Good quality employment opportunities for all | + | There is no direct link with this objective. However, indirectly this may create jobs specialising in implementation of technology needed to fully implement this policy. A link could be made between this policy and the creation of Green Jobs in the Sustainable Economic Growth policy. |
| EC2 | Good education and training opportunities for all which build the skills of the population | ○ | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| EC3 | Conditions for business success, stable economic growth and investment | + | Comments stand as per the Preferred Options stage. This identified that there may be conflict regarding the costs of implementing the measures set out in the policy against the cost of employment land development. A new addition to the policy are the interim standards expected in York which brings forward the necessity to incorporate the high environmental measures. In the long-term however, savings should be made in relation to costs reflecting energy efficiency and renewable energy measures implemented. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | ○ | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | ○ | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| S2 | Maintain or reduce York's existing | I/? | Comments stand as per the Preferred Options analysis which stated that the impact of this |

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| | noise levels | | will depend on the scale and type of development. This policy should mitigate any noise through high quality sustainable design. |
| S3 | Improve the health and well being of the York population | I/+ | Comments stand as per the Preferred Options analysis which identified that the implementation of renewable energy schemes should have a positive influence on health through the reduction of fossil fuels and cleaner renewable technologies on reducing pollution and establishing cleaner air quality. Further to this the building standards will create quality buildings which will aid people well-being. |
| S4 | Safety and security for people and property | O | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| S5 | Vibrant communities that participate in decision-making | O | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| S6 | Reduce the need to travel by private car | O | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | O | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | O | Comments stand as per those at Preferred Options which stated that there is no direct link between this policy and the objective. |
| S9 | Quality affordable housing available for all | I/+ | Comment stand as per the Preferred Options analysis which identified that this policy does not have a direct influence upon this objective but will provide social benefits connected to housing. The running costs of homes should decrease given that properties and business will have energy efficiency measures incorporate into the design. The SA acknowledges however, the costs of implementing such measures are more from the outset of development but this is balanced against the need to improve environmental performance and offset by long-term reduced running costs. |
| S10 | Social inclusion and equity across all sectors | O | The is no direct link between this policy and the objective. Reducing running costs in the long-term may have aid social equity. |
| EN1 | Land use efficiency that maximises the use of brownfield land | + | Comment stand as per the Preferred Options analysis which identified that incorporating sustainable design and construction measures set out in his policy will help to maximise the use of sites to be developed. The SA supports the inclusion that major applications (10 |

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| | | | <p>dwelling or more or 1000 sqm of non-residential floorspace) are required to submit a sustainable energy statement setting out its intentions of how it will meet this policy directly as this will provide a method for monitoring the policy effectively to understand how far the policy is being met. Developments above this size also need to incorporate the requirements for Code for Sustainable Homes and BREEAM in their design and construction which the SA welcomes.</p> |
| 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 | ? | <p>Comments stand as per the Preferred Options analysis. This found that the main impacts on this objective will mainly be identified through implementation. There is also the potential for conflict in this objective. The conflict is between the positive impacts that the sustainable design and construction will have on developing quality buildings within the city against the implementation of renewable energy. The types of renewable energy will need to be of appropriate scale and type to maintain the character and setting of the city. The policy now makes clear that sustainable design and construction refers to all new residential and non residential developments including conversion and change of use. The SA welcomes this addition to the policy to capture all development within the remit of the policy.</p> <p>The policy has added information to specify that different technologies may not be deemed inappropriate provided it maintains the openness of the Greenbelt and does not conflict with its primary purpose to maintain York's character and setting. The SA welcomes the identification of the potential conflict as it should help to achieve this objective whilst also not inhibiting the development of certain renewable technologies which are valuable in achieving other sustainability objectives.</p> |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | ○ | <p>This policy focuses on design and renewable energy contributions from development. Under the remit of this policy cross references to other factors which influence sustainable design could be included.</p> |

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| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | ++ | Comments stand as the Preferred Options analysis although some changes have been made to the policy. This policy directly contributes to the achievement of this objective through the implementation of low carbon renewable technologies and sustainable design and construction. Further to this it provides a way to move forward to manage, adapt and mitigate climate change and deliver the Climate Change Framework and Action Plan. The SA welcomes in the justification further explanation of the type of technologies which will be suitable in different locations plus the location criteria to further supplement this approach. The SA also welcomes in the reference in the Justification for York Northwest offering the potential to be an exemplar site for sustainable design and construction. |
| EN5 | Improve air quality in York | ? | <p>There is a strong cross over between this policy and air quality. Lowering emissions through renewable technologies should have a positive impact on this objective. However, it should be borne in mind that some renewable technologies can adversely impact on air quality where emissions are already high. For example implementing biomass schemes within the AQMA area could have negative impacts. The SA welcomes the location criteria included and the policy link the air quality.</p> <p>The Core Strategy justification has strengthened its recognition of how different renewable technologies affect air quality, in particular how combustible technologies such as biomass can effect the AQMA. The SA welcomes this recognition and signposting to the evidence base for more detailed understanding. This should help this policy further adhere to improving air quality and meeting this sustainability objective.</p> |
| EN6 | The prudent and efficient use of energy, water and other natural resources | ++ | Comments stand as per the Preferred Options analysis which identifies that the implementation of the sustainable design standards as well as renewable energy technologies will have a direct positive impact on this objective. This policy not only aims to generate energy from renewable sources but will also make development adhere to certain levels of energy efficiency and minimisation through the Code for Sustainable Homes and BREEAM which are above current standards as set out in the building regulations. The SA welcomes the stated interim measures for between 2011 to 2016 prior to the highest national standards being implemented. This should help to further meet this objective as developers will have to include measures to meet the high environmental standards in a shorter period of time. |
| EN7 | Reduce pollution and waste | I | Comments stand as per the Preferred Options analysis although this policy has been |

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| | generation and increase levels of reuse and recycling | | amended. There is a link in the justification to how design can minimise waste and maximise recycling. |
| EN8 | Maintain and improve water quality | + | This policy takes consideration for water as resource within the justification to the policy, This satisfies that when resources is referred to, it includes water management and efficiency. |
| EN9 | Reduce the impact of flooding to people and property in York. | + | Comments stand as per the Preferred Options policy which states that design can incorporate measures for water management and efficiency to minimise the effects of pluvial flooding. Also, development is subject to flood risk constraints set out by the Spatial Strategy, the Flood Risk policy and location requirements set out within the justification of the policy. Design could incorporate green infrastructure to mitigate any adverse effects as well. |

Policy CS22: Flood Risk

The LDF will ensure that new development is not subject to flood risk, incorporates sustainable drainage and is designed and constructed in a way that mitigates against current and future flood events.

Flood Risk

In considering the suitability of any proposed development site, either through the Allocations Development Plan Document process or when determining planning applications, the Council will use the 'Flood Risk Vulnerability Classification' and 'Flood Risk Vulnerability and Flood Zone Compatibility Classification' tables from the *Strategic Flood Risk Assessment (2011)* and any subsequent updates.

In addition, a site-specific Flood Risk Assessment, which takes account of future climate change must be carried out:

- when allocating sites through the LDF process; and
- for all planning applications of 1 hectare or greater in Flood Zone 1 and for all applications in Flood Zones 2, 3a, 3a(i) and 3b.

Sustainable Drainage

All new development will be required to include the implementation of Sustainable Drainage Systems (SUDS) unless it can be demonstrated that it is not technically feasible or viable.

More specifically:

- all brownfield development in York will be required to demonstrate that there will be a reduction of at least 30% in existing runoff rates; and
- all greenfield development must demonstrate no alteration of runoff rates following completion of development. Any additional volume of runoff following development of a greenfield site must be taken into account by providing long-term storage.

Retrofitting for flood prevention and SUDS within the existing built environment must be explored where it would not damage environmental assets.

Design and Construction

The LDF will ensure that the design and construction of new development takes account of existing and future flood risk particularly given the implications of climate change. Further advice on this issue will be provided through the production and adoption of a Supplementary Planning Document (SPD) relating to Sustainable Design and Construction.

No additional Analysis undertaken.

Policy CS23: Sustainable Waste Management

The LDF will promote sustainable waste management by encouraging waste prevention, reuse, recycling, composting and energy recovery through the use of the Waste Hierarchy and effectively managing all of York's waste streams and their associated waste arisings. This will be achieved in the ways set out below:

- i. working jointly with North Yorkshire County Council to identify the Waste Private Finance Initiative facilities for residual municipal waste through:
 - Mechanical Treatment;
 - Anaerobic Digestion; and
 - Energy from Waste.
- ii. safeguarding existing facilities (as shown on the Key Diagram) including Harewood Whin and York's Household Waste Recycling Centres. This will include facilitation of the Beckfield Lane HWRC relocation.
- iii. identifying through an appropriate Development Plan Document, suitable alternatives for municipal waste, as required during the lifetime of the plan. This must be in conformity with Spatial Principle 2 and meet operational requirements of any facility. Priority will be given to:
 - existing waste sites;
 - established and proposed industrial estates, particularly where there is the opportunity to co-locate with complementary activities, reflecting the concept of 'resource recovery parks';

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| <ul style="list-style-type: none"> - previously-developed land; and - redundant agricultural and forestry buildings including their curtilages, if suitably accessible for purpose. <p>iv. requiring the integration of facilities for waste prevention, re-use, recycling composting and recovery in association with the planning, construction and occupation of new development for housing, retail and other commercial sites; and</p> <p>v. promoting opportunities for on-site management of waste where it arises at retail, industrial and commercial locations, particularly in the main urban area.</p> | | | |
| | Headline objective: Reduction of York's Ecological Footprint | + | Aiming to minimise the amount of waste using the principles of the waste hierarchy is positive for reducing the ecological footprint overall. The policy aims to use a variety of methods to treat waste and also extract energy from different treatments. |
| EC1 | Good quality employment opportunities for all | ? | Comments are as per those made at the Preferred Options stage which stated that there are likely to be few effects significant for the economy. |
| EC2 | Good education and training opportunities for all which build the skills of the population | ○ | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| EC3 | Conditions for business success, stable economic growth and investment | ○ | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| EC4 | Local food, health care, education / training needs and employment opportunities met locally. | ○ | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| S1 | Enhance access to York's urban and rural landscapes, public openspace / recreational areas and leisure and cultural facilities for all | l | There is the potential for waste facilities to have a detrimental impact on the environment. The revised policy takes consideration of the recommendations made by the SA to include the natural environment, openspaces and amenity of residents as factor in considering the location of any new waste facilities. The outcome for this objective would depend upon implementation of these constraints in developing new facilities. |
| S2 | Maintain or reduce York's existing noise levels | l | Comments stand as per Preferred Options analysis, which identified that noise related issues would be dependent upon implementation. |
| S3 | Improve the health and well being of the York population | l/? | Comments stand as per Preferred Options analysis, which identified that noise related issues would be dependent upon implementation. Any health issues associated with waste, |

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| | | | air pollution or general pollution arising from treatment and/or collection would be unknown until implementation and beyond also. |
| S4 | Safety and security for people and property | O | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| S5 | Vibrant communities that participate in decision-making | O | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| S6 | Reduce the need to travel by private car | I | The revised policy advocates a safeguarding of local household waste recycling and processing centres alongside using the waste hierarchy to minimise, reuse and recycle waste at new development sites. This will be beneficial in the long-term as they will be available within a short distance from residential areas or within new residential areas. It is vital that waste is treated as close to the source as possible to minimise all vehicle journey's relating to waste management. Ultimately this will depend upon implementation. |
| S7 | Development which provide good access to and encourage use of public transport, walking and cycling | O | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| S8 | A transport network that integrates all modes for effective non-car based movements | O | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| S9 | Quality affordable housing available for all | O | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |
| S10 | Social inclusion and equity across all sectors | I | Comments are as per the Preferred Options stage which identified that any new waste facilities should not impact on local amenity or put one community inequitable harm from the proliferation of these types of facility. The SA welcomes the inclusion of "amenity of residents" to address this. |
| EN1 | Land use efficiency that maximises the use of brownfield land | I | The approach taken by the revised policy includes provision for new facilities to be located on existing or proposed industrial sites. This helps to meet this objective. In progressing any new sites, the process will need to ensure that it does not conflict with any other proposed uses and that this would be the best use for the site. It is also beneficial that the policy includes for new developments to have facilities for waste management to make sure that large development sites include for this also. |
| EN2 | Maintain and improve a quality | _/I | Comments are as per the Preferred Options stage which identified that waste facilities could |

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| | built environment and the cultural heritage of York and preserve the character and setting of the historic city of York | | have potentially negative effects on the character and setting of the facility. However, this policy still includes the historic character and setting of the city as a factor in consideration for any new development. |
| EN3 | Conserve and enhance a bio-diverse, attractive and accessible natural environment | I | The revised policy now includes protecting the natural environment and openspace as part of the factors for consideration when determining new locations for development. This is positive for this objective in helping to direct development away from areas which may have a high biodiversity value or at the very least highlight the main issues on the site, the integrity of which can be preserved. |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change | ? | Comments are as per the Preferred Options stage which identified that this policy should help to reduce material use and factors which lead to climate change through limiting landfill and reusing and recycling waste. The revised policy identifies working with North Yorkshire the combined treatment of waste. The SA recognises the implications for this in terms of vehicle travel and emissions and suggests that the location for this new facility is within a short distance to minimise any adverse impacts. It is acknowledged that sustainable treatment of the waste will need to be balanced against the trip generation and could be offset through the scheme in some way. |
| EN5 | Improve air quality in York | ? | Comments are as per the Preferred Options stage which identified that there are the potential for negative effects to air quality which need to be considered in any proposals. |
| EN6 | The prudent and efficient use of energy, water and other natural resources | + | Comments are as per the Preferred Options stage which identified that implementing this policy will help to reduce waste and should help in protecting primary resources. |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling | ++ | This policy directly meets this objective. The SA welcomes that new development will have to adhere to the waste hierarchy from construction through the occupation. It also welcomes the recommendation to set out more clearly the considerations for locating a waste facility as well as the environmental and social factors. |
| EN8 | Maintain and improve water quality | ? | Comments are as per the Preferred Options stage which identified that some facilities, particularly incinerators, may have an adverse impact on water quality and that an assessment of surface and ground waters will be required initially and for ongoing monitoring. |
| EN9 | Reduce the impact of flooding to people and property in York. | O | Comments are as per the Preferred Options stage which identified that there is no clear link between this policy and the objective. |

Policy CS24: Safeguarding Mineral Resources and Local Amenity

The LDF will reduce the consumption of non-renewable mineral resources by encouraging re-use and recycling of construction and demolition waste and safeguard mineral deposits. This will be achieved through the following:

- i. minimising the consumption of non-renewable mineral resources in major developments by requiring developers to demonstrate good practice in the use, reuse, recycling and disposal of construction materials;
- ii. safeguarding sand and gravel and coalbed methane mineral resources, through ensuring other forms of development do not prejudice future mineral extraction;
- iii. if a proven need exists, identifying sites of sufficient quality for mineral extraction, inline with agreed apportionments and guidelines, through an appropriate DPD. Future sites for mineral extraction will only be considered where they:
 - do not compromise Spatial Principle 2;
 - do not adversely affect the amenities enjoyed by existing or future occupiers and users of nearby dwellings and buildings; and
 - ensure that once extraction has ceased, high standards of restoration are achieved.

No additional Analysis undertaken.

Policy CS25: Infrastructure and Developer Contributions

New development will be supported by appropriate physical, social and economic infrastructure provision. New development will not be permitted unless the infrastructure required to service the development is available or the provision of infrastructure can be coordinated to meet the demand generated by the development. The Council will work with infrastructure providers and other delivery agencies to determine the appropriate level of provision. If critical elements of infrastructure cannot be delivered then this would trigger a review of development levels.

The Council will seek contributions from developers to ensure that the necessary infrastructure is in place to support future development in York. Contributions will be sought to fund strategic infrastructure that helps to deliver the Vision and Objectives of the Core Strategy as well as specific infrastructure that is necessary to deliver an individual site. The Council will prepare a further planning document which will set out the mechanism through which developer contributions will be sought.

No additional Analysis undertaken.