



Annex C: Draft Sustainability Appraisal (Main) Report



City of York Council

Local Plan (Publication Draft)

Sustainability Appraisal Report

AMEC Environment & Infrastructure UK Limited and York City Council

September 2014

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City of York Council

Local Plan (Publication Draft)

Sustainability Appraisal Report

AMEC Environment & Infrastructure
UK Limited

September 2014



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Non-Technical Summary

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1. Introduction

1.1 Overview

City of York Council has completed the ‘City of York Local Plan (Publication Draft) (September 2014)’ (hereafter referred to as the ‘draft Local Plan’), setting out the vision, plan outcomes, planning policies and site allocations that will guide development in York to 2030 and set Green Belt boundaries that will endure until at least 2040. The Council, with support from AMEC Environment and Infrastructure UK Ltd (AMEC), has undertaken a Sustainability Appraisal (SA) of the draft Local Plan. The SA assesses the environmental, social and economic performance of the draft Local Plan against a set of sustainability objectives in order to identify the likely significant social, economic and environmental effects. Where appropriate, the SA has highlighted areas where measures to avoid, minimise or mitigate any potential negative effects could be required. Similarly, and where appropriate, opportunities for improvements in the contribution towards sustainability have also been identified.

The development of the Local Plan reflects work which began in 2005 when the Council commenced the preparation of its Local Development Framework (LDF) Core Strategy. This has included engagement, assessment and the development of a substantial body of evidence. SA has been an integral part of the development of the Local Plan including in respect of earlier work on the Core Strategy. More specifically, SAs have been undertaken of the following:

- Core Strategy Issues and Options 1 (2006);
- Core Strategy Issue and Option 2 (2007);
- Core Strategy Preferred Options (2009);
- Core Strategy Submission (Publication) (2011);
- Local Plan Preferred Options (2013);
- Further Sites Consultation (2014).

This report presents the findings of the SA of the draft Local Plan.

The SA objectives and the approach to the appraisal of the Local Plan is based on the methodology described in the SA Scoping Report (2013)¹. The SA objectives have been informed by those of national, regional and local policy and baseline information. The baseline information summarised in this report has been updated to ensure that the

¹ City of York Council (2013) *Sustainability Appraisal Scoping Report*.

evidence base and resulting appraisal remains appropriate and relevant to the prevailing conditions and issues in York.

1.2 The City of York Draft Local Plan

The draft Local Plan (which is the subject of this SA) sets out the Council's vision for York out to 2030 and provides the spatial planning response to the challenge of growth. It has been developed taking into account national planning policy and guidance, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base studies and the outcomes of engagement.

The Council consulted on Core Strategy Issues and Options in June 2006 and this represented the first formal stage in the preparation of the Local Plan and was followed by further consultation on issues and option in September 2007 and preferred options in June 2009. Taking into account extensive consultation on plan options, the findings of evidence base studies and assessment, the Council prepared its draft Core Strategy that was submitted for examination to the Secretary of State in February 2012. This set out (inter-alia) a vision, strategic objectives, targets and policies to guide future development in the City. However, following the (partial) revocation of the Regional Strategy (the Yorkshire and Humber Plan)² in 2013 and the publication of the National Planning Policy Framework (NPPF) in March 2012, the Core Strategy was withdrawn from the examination process in order to produce a Local Plan compliant with new national planning policy.

To inform the Local Plan, the Council commissioned a number of important evidence base studies. These studies included (inter-alia) the Economic and Retail Growth and Visioning Study, Evidence on Housing Requirement in York, the North Yorkshire Strategic Housing Market Assessment (SHMA) and extensive site identification and assessment work which together supported the identification of development options for the City that were set out in the Local Plan Preferred Options and subject to consultation in June 2013. The Preferred Options was accompanied by a SA Report which considered the sustainability strengths and weaknesses of the plan and policy options.

The Local Plan Preferred Options has been revised to reflect representations received during consultation, further evidence base work and testing (including an update² to earlier work on housing requirements) and findings of the accompanying SA. It has also taken account of the Further Sites Consultation undertaken in June 2014, the purpose of which was to reflect both the latest information/evidence on proposed site allocations and to seek comments on new sites received during the consultation on the Preferred Options Local Plan. The draft Local Plan, which is the subject of this SA, is being issued for consultation before it is considered by an independent planning inspector.

² Statutory Instrument 2013 No. 117 *Town and Country Planning, England The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013.*

The draft Local Plan comprises the following core components:

- Vision and Outcomes;
- Key Development Principles;
- Spatial Strategy;
- Thematic Policies.

Each plan component is discussed in-turn below.

1.2.1 Vision and Outcomes

The vision for York, as set out in Chapter 2 of the draft Local Plan, is reproduced below:

“York aspires to be a City whose special qualities and distinctiveness are recognised worldwide. The Local Plan aims to deliver sustainable patterns and forms of development to support this ambition and the delivery of the city’s economic, environmental and social objectives. This will include ensuring that the city’s spaces and archaeology can contribute to the economic and social welfare of the community whilst conserving and enhancing its unique historic and natural environmental assets.

The plan will ensure that the vision and outcomes are delivered in a sustainable way that recognises the challenges of climate change, protects residents from environmental impacts and promotes social inclusivity.”

The vision and objectives for the draft Local plan are described in terms of the following interconnected priorities:

- Create Jobs and Grow the Economy;
- Get York Moving;
- Build Strong Communities;
- Protect the Environment.

1.2.2 Key Development Principles

Chapter 2 of the draft Local Plan includes three policies which detail the key development principles which are intended to support the delivery of the vision outlined above. These policies include:

- Policy DP1 - the approach taken to development which reflects the role of the York Sub Area;

- Policy DP2 - the basic development principles that arise from the vision which underpin the strategic policies in each of the subsequent sections of the plan; and
- Policy DP3 - the key development principles pertinent to quality ‘sustainable communities’ that will also guide the Council in its consideration of all development proposals.

These policies are supplemented by Policy DP4 which sets out the Council’s overall approach to development management which is to take a positive approach in favour of sustainable development, work proactively with applicants, meaning proposals can be approved where possible, and to secure development that improves economic, social and environmental conditions in the area.

1.2.3 Spatial Strategy

The spatial strategy is set out in Chapter 3 of the draft Local Plan. The spatial strategy broadly reflects York’s sub-regional role in the Leeds City Region, the York Sub Area and the York and North Yorkshire Sub Region. Collectively, these seeks to ensure that the City is a key economic driver, retail, service and transport hub and that its housing needs are met within the local authority area whilst conserving and enhancing the City’s historic and natural environment.

In this context, the draft Plan makes provision for employment land to accommodate over 13,500 new jobs and a minimum annual provision of 996 new dwellings (1,170 dwellings per annum in the first six years) over the plan period. As per Policy SS1 (Delivering Sustainable Growth for York), the location of this development will be guided by the following five spatial principles:

- Conserving and enhancing York’s historic and natural environment. This includes the city’s character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;
- Ensuring accessibility to sustainable modes of transport and a range of services;
- Preventing unacceptable levels of congestion, pollution and/or air quality;
- Ensuring flood risk is appropriately managed;
- Where available and viable, the re-use of previously developed land will be encouraged.

York City Centre is to remain the focus for main town centre uses with the majority of dwellings (74.5%) to be located at 20 strategic housing sites including land adjacent to the existing built up area of York and a new settlement to the south east. Four strategic sites are identified as ‘Key Areas of Change’, the delivery of which is essential to achieving the draft Local Plan vision. These sites are considered in policies SS5 to SS8 and include:

- ST15: Whinthorpe (to accommodate approximately 6,000 dwellings of which around 4,680 will be delivered over the plan period);

- ST7: East of Metcalfe Lane (to deliver approximately 1,800 dwellings around 1,330 units of which will be delivered over the plan period);
- ST14: Clifton Gate (to accommodate approximately 2,800 dwellings of which 2,591 units will be delivered over the plan period); and
- ST8: Land North of Monks Cross (to deliver approximately 1,400 dwellings around 1,200 units of which will be delivered over the plan period).

York Central (ST5), meanwhile, is identified an ‘Opportunity Area’ under Policy SS9 to enable the creation of a new piece of the City; with exemplar mixed development including a world class urban quarter forming part of the City Centre. This will include: a new central business district; expanded and new cultural and visitor facilities; residential uses (around 410 dwellings); and a new vibrant residential community. Castle Piccadilly (ST20) is also allocated as an Area of Opportunity under Policy SS10) and is promoted by the Council as a sustainable regeneration and enhancement opportunity.

The City’s remaining housing requirement is to be met at smaller (local) allocations (comprising a total of 2,700 dwellings). The overall land supply calculation includes an allowance for windfall sites which are under 0.2ha and not allocated. However, the draft Local Plan takes a cautious approach on this matter and does not rely on these sites to ensure land supply is adequate to meet objectively assessed need. Rather it makes use of this component of supply to provide additional flexibility. In accordance with the requirements of the NPPF an additional buffer of 20% has been included for the first six years of the Plan in response to an under supply of housing.

In addition to the employment land provided for as part of the proposed strategic allocations (57.4ha), a further 8ha of land is allocated at dedicated employment sites. The draft Local Plan also allocates three sites for Gypsies, Travellers and Travelling Showpeople.

Importantly, the draft Local Plan defines the proposed Green Belt, the overall purpose of which is to preserve the setting and special character of York, whilst assisting in safeguarding the countryside from encroachment. In order to create a Green Belt that endures beyond the plan period, 12 sites are identified as land to be safeguarded for longer term development needs (see Policy SS3).

1.2.4 Thematic Policies

To support the overall strategy for development, the draft Local Plan includes policies across the following chapters:

- **Economy and Retail** which has 10 draft policies including proposed employment land allocations;
- **Housing** which has nine policies including proposed housing allocations and sites allocated for Gypsies, Travellers and Travelling Showpeople;
- **Community Facilities** which has four policies;

- **Education** which has eight policies including proposals to support the expansion of the City’s university campuses and other educational facilities;
- **Design and Place Making** which has 13 policies;
- **Green Infrastructure** which has six policies including proposals for new open space provision;
- **Managing Appropriate Development in the Green Belt** which has four policies;
- **Climate Change** which has two policies including land allocated for solar farm development;
- **Environmental Quality and Flood Risk** which has five policies;
- **Waste and Minerals** which has two policies;
- **Transport and Communication** which has 11 policies including proposals for strategic transport improvements;
- **Delivery and Monitoring** which has one policy.

1.3 Sustainability Appraisal

SA of local plans is a requirement on all local planning authorities (i.e. the Council in this instance) under Section 19(5) of the Planning and Compulsory Act 2004 (as amended). The NPPF outlines the requirements for SA as they relate to plan preparation at paragraph 165:

“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”

As referred to above, in undertaking this requirement the Council must also incorporate the requirements of the European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the Strategic Environmental Assessment (SEA) Directive. The Government has provided guidance on the implementation of the SEA Directive in respect of preparing land use plans³ and with specific regard to local plan development⁴. Government guidance contains a Quality Assurance checklist to help ensure that the requirements of the SEA Directive are met. This has been completed in respect of this SA Report and is contained at **Appendix A**.

³ ODPM, September 2005: *Practical Guide to the Strategic Environmental Assessment Directive*

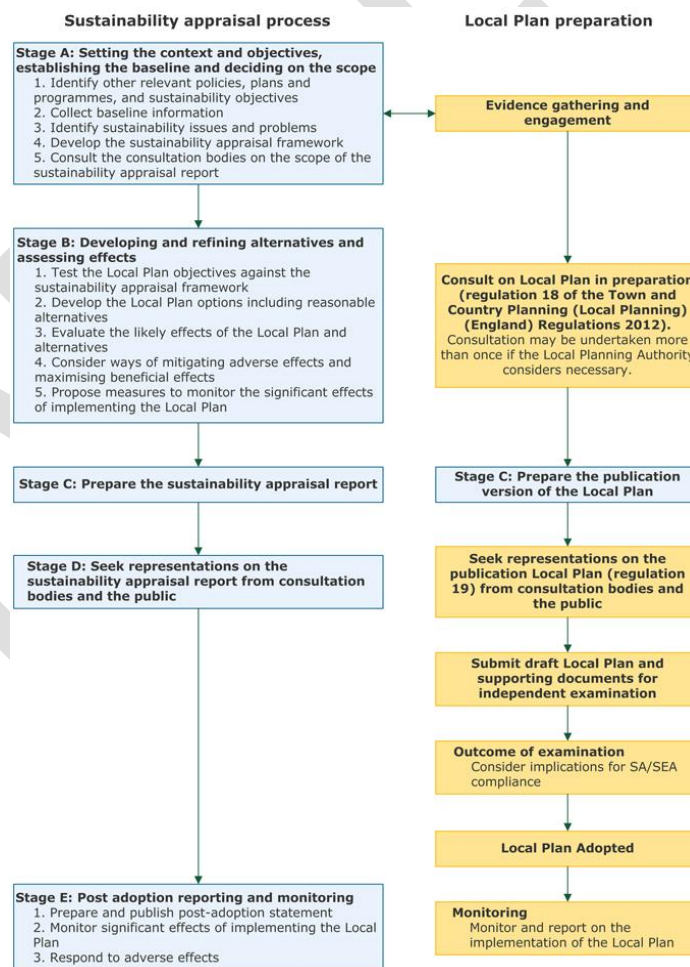
⁴ See DCLG, 2014, *Planning Practice Guidance*, available from <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

An SA of the draft Local Plan will ensure that the likely social, economic and environmental effects of the vision, outcomes, proposed policies and site allocations are identified, described and assessed. Where negative effects are identified, measures will be proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures will be considered that could enhance such effects. For planning policies in particular, this usual means amendment to proposed policy wording; however, on occasion it can result in new policies proposed or the suggested deletion of others.

1.4 Sustainability Appraisal and the Local Plan

Figure 1.1 illustrates the relationship between the Local Plan process and the SA process (which comprises of five stages).

Figure 1.1 Stages and Interrelationship between the Local Plan and SA



Stage A of the SA process has been completed through the production of a Scoping Report. The Scoping Report established the framework for undertaking the SA. It included a set of SA objectives against which the sustainability performance of the draft Local Plan could be measured and monitored. The Scoping Report also established the baseline data and set the sustainability context for York. An updated Scoping Report was issued to the statutory consultation bodies (Natural England, English Heritage and the Environment Agency) in February 2013. It was also made available on the Council's website. The SA objectives were amended as a result of the responses received.

Stage B is iterative and involved the development and refinement of the Local Plan by testing the sustainability strengths and weaknesses of the emerging Plan options. This helped promote sustainable development through the early integration of sustainability considerations into the preparation of the Plan. As highlighted in **Section 1.1**, SA has been undertaken at key stages in the Plan's development and in particular in respect of the Local Plan Preferred Options. In completing these SAs, the Council has sought to ensure that the strategic options, plan policies and development sites identified have been tested for their contribution to sustainability⁵.

This SA Report represents the key output of **Stage C** of the SA process and presents the findings of the appraisal of the draft Local Plan. It is being issued for consultation before it is considered by an independent planning inspector (**Stage D**).

Following Examination in Public (EiP), and subject to any significant changes to the draft Local Plan that may require appraisal as a result of the EiP, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the Local Plan. This will set out the results of the consultation and SA processes and the extent to which the findings of the SA have been accommodated in the adopted Local Plan. During the period of the Local Plan, the Council will monitor the implementation of the Local Plan and any significant social, economic and environmental effects of its implementation (**Stage E**).

1.5 Consultation

The SA process has been informed by ongoing consultation, most notably during the scoping stage and as part of the SA of the Local Plan Preferred Options. A summary of consultation responses received to the SA Report on the Local Plan Preferred Options, together with an overview of how these responses have been taken into account in the preparation of this report, is contained at **Appendix B**.

1.6 Other Assessments

⁵ SA was undertaken for the former LDF process for the Core Strategy as well as the York Northwest Area Action Plan (AAP) and the City Centre Issues and Options AAP. These documents are available to view via the Council's website.

Alongside the SA, the draft Local Plan has also been subject to, and informed by, Habitats Regulations Assessment (HRA) and Heritage Impact Appraisal (HIA).

1.6.1 Habitats Regulations Assessment

The *Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010* and *The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007* (as amended) (collectively referred to in this report as the Habitats Regulations) implement the Habitats Directive in England and Wales. Under the Habitats Regulations, any land use plan likely to have a significant effect upon a ‘European site’ must be subject to an appropriate assessment to determine the implications for the designated site in view of its conservation objectives. ‘European sites’ are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under *Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora* and Special Protection Areas (SPA) designated under *Council Directive 2009/147/EC on the Conservation of Wild Birds*. Ramsar Sites (designated under the 1976 Ramsar Convention) are not European sites but under UK planning policy are given the same level of protection.

Under the Habitats Regulations the Council, as the competent body, must determine if the draft Local Plan is likely to have a significant (adverse⁶) effect on a European or Ramsar site in Great Britain or a European offshore marine site, either alone or in combination with other plans or projects. If significant effects are anticipated then an appropriate assessment of the implications for the site in view of its conservation objectives must be undertaken.

The Natura 2000 sites being assessed as part of the HRA of the draft Local Plan are:

- Strensall Common (SAC);
- Lower Derwent Valley (SAC/SPA/RAMSAR);
- River Derwent (SAC);
- Skipwith Common (SAC);
- Kirk Deighton (SAC);
- Humber Estuary (SAC).

The findings of the HRA have informed the assessment of the draft Local Plan as part of this SA and specifically in respect of SA Objectives 8 (Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment).

⁶ Though beneficial effects may arise from a plan, only adverse effects are considered to be of consequence in undertaking Habitats Regulations Assessment.

A HRA Report has been produced to accompany the draft Local Plan. This is available via the Council's website via the following link: www.york.gov.uk/localplan

1.6.2 Heritage Impact Appraisal

The purpose of the Heritage Impact Appraisal (HIA) is to assess whether the draft Local Plan will conserve or enhance the special characteristics of the City. The assessment has considered the strategic sites, allocations and policies of the draft Plan against six principal characteristics of the historic environment that help define the special qualities of York. The principal characteristics detailed are:

- Strong Urban Form;
- Compactness;
- Landmark Monuments;
- Architectural Character;
- Archaeological Complexity;
- Landscape and Setting.

The findings of the HIA have informed the assessment of the draft Local Plan as part of this SA and specifically in respect of SA Objectives 14 (Conserve or enhance York's historic environment, cultural heritage, character and setting) and SA Objective 15 (Protect and enhance York's natural and built landscape).

A HIA Report has been produced to accompany the draft Local Plan. This is available via the Council's website via the following link: www.york.gov.uk/localplan

1.7 Purpose of this Report

This SA Report presents the findings of the appraisal of the draft Local Plan, consistent with the requirements of the SEA Directive. The Report is structured as follows:

- **Section 1: Introduction.** This section provides a background to the SA process and requirements for SA. It also provides an overview of the draft Local Plan.
- **Section 2: Evolution of the Spatial Strategy.** This section describes how the draft Local Plan spatial strategy has evolved including the reasons for the selection of preferred options and rejection of alternatives.

- **Section 3: Context and Baseline.** This section provides an overview of the baseline and context that has informed the development of the SA objectives used to assess the sustainability of the draft Local Plan.
- **Section 4: Approach to Sustainability Appraisal.** This section sets out the SA objectives and the appraisal criteria used to appraise the draft Local Plan.
- **Section 5: Appraisal of Effects.** This section summarises the findings of the appraisal of the effects of the draft Local Plan.
- **Section 6: Conclusions and Recommendations.** This section presents the conclusions of the appraisal.

In addition, this SA Report is accompanied by a Non-Technical Summary (NTS) and a volume of appendices. The appendices include the appraisal of effects of draft Local Plan policies, strategic site allocation and smaller scale (local) allocations.

1.8 Commenting on this SA Report

This report has been issued alongside the draft Local Plan. Comments on the Report should be submitted to City of York Council by **(to be confirmed)**.

Please submit any comments you may have to:

York Local Plan
City Of York Council
FREEPOST (Y0239)
Y01 7ZZ

E:mail: localplan@york.gov.uk

2. The Development of the Local Plan

City of York's Local Plan has evolved using intelligence gathered from the earlier Core Strategy that was not adopted as well as a diverse evidence base and revised government guidance. This section of the SA explains how the Council has drawn on the development of the Core Strategy and these other sources to help shape the Spatial Strategy now used in the draft Local Plan. This is intended to document the process of the development of the preferred approach alongside the rejection of alternatives.

2.1 LDF Core Strategy

The Council started to prepare its Local Development Framework following the approval of the draft Local Plan fourth set of changes for Development Control Purposes in April 2005 and the introduction of the Local Development Framework (LDF) by the Government. The Core Strategy was the key strategic planning document prepared through a number of stages to set out the key spatial policies for the city.

2.1.1 Issues and Options 1 (2006) and 2 (2007)

Issues and Options 1 set out the broad issues and options facing York. This was followed by Issues and Options 2, which explored these themes in more detail and began to consider the opportunities and need for development.

The spatial approach included within both stages of the Issues and Options were strongly influenced by the then emerging Regional Spatial Strategy (RSS) for Yorkshire and Humber, which set targets for the scale of development and had an emphasis on urban consolidation with limited development in smaller towns and larger villages. For York this meant that new development should be concentrated within the main urban area with limited development within larger villages. To understand how York could grow in the future and where development should be located, a settlement hierarchy was developed following an analysis of settlement sustainability that included access to services and transport. As part of this process, consideration was also given to highway capacity as well as to the key characteristics of York which shaped its urban form (the 'shapers' were historic character and setting, flood risk and nature conservation). Market requirements were also considered for employment sites.

Growth options for both housing and employment were based upon the emerging RSS figures as well as the latest evidence base statistics. These were presented for a 20 year time span to enable a degree of permanence to be given to the Green Belt.

At the Issues and Options 2 stage, the following options were consulted on:

Spatial Strategy

- Option 1: Prioritising Settlement accessibility - Distribute development to the settlements offering the best access to jobs and services, using a sustainability ranking;
- Option 2: Prioritising existing trends - Continue to distribute housing development broadly in line with past trends, following a similar pattern for employment because of its connection with housing growth in creating sustainable communities;
- Option 3: Prioritising housing need - Distribute housing development in terms of the needs of the groups and priorities identified by the Housing Market Assessment (HMA). This identifies the urban and suburban parts of York (including Haxby and Wigginton) as offering the best opportunities to provide for the needs of newly forming households; and
- Options 4: A combination of the above broad factors.

Housing Growth

- Option 1: Emerging RSS housing figure – 630 dwellings per annum;
- Option 2: Emerging RSS Panel Report – 791 dwellings per annum (640pa 2004-2011; 850pa 2011-2021);
- Option 3: Projecting forward RSS - 718 dwellings per annum;
- Option 4: SHMA housing need – 982 dwellings per year; and
- Option 5: Lower housing growth – less than 630 dwellings per annum.

Employment Growth

- Option 1: Employment Land Review Growth projections – 1060 additional jobs per annum;
- Option 2: Support the RSS growth projections – 545 new jobs per annum; and
- Option 3: An alternative approach (to be suggested through consultation).

Sustainability Appraisal

A Sustainability Appraisal was prepared for both stages of the Core Strategy Issues and Options by Baker Associates. This was published alongside the Core Strategy Issues and Options Local Plan in each consultation undertaken. **Table 2.1** summarises the Issues and Options Stage and outcomes of the consultation process, including the comments made by the SA.

Table 2.1 Summary of the SA of the Issues and Options 1 and 2

ISSUES AND OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
Spatial Strategy	PPS1, PPS12 Draft Regional Spatial Strategy for Yorkshire and Humber (RSS)	Relative sustainability of different settlements; Broad economic and demographic trends; Market trends and pressures; Emerging broad options tested; Settlement accessibility; Existing trends; Housing need ; Or a combination.	Analysis and emerging options provide a useful start point. However, there was concern that the scale and distribution of development is not articulated within I&O1. Analysis also focuses on constraints to development rather than opportunities for development.	Majority of respondents prioritised settlement accessibility and direct most growth to York's main urban area. Comments provided on merits of the different constraints on development: Flood risk, protecting all habitats and tackling congestion.
Housing Growth	RSS PPS3	Range from 630 to 982 Drawing of demographic and market demand Other factors taken into consideration include development constraints and forecast economic growth	Balance between jobs and homes needs to be found to achieve more self-containment. Likely increase in RSS housing target and limited opportunity to depart from the RSS is a major influence.	Core strategy should reflect most up to date RSS figures. (RSS not finalised at time of consultation). Flexibility required to accommodate higher figures should need arise.
Employment Growth	RSS	Figures set out in RSS. A first stage Employment Land Review (ELR) was also commissioned by the council to establish the amount of predicted jobs growth.		
Distribution of Growth	Securing the Future 2005 PPS1 PPS12 Emerging RSS	Brownfield sites first policy. <i>Broad Influences:</i> Regional context, relationship between York & its larger villages – accessibility & past market trends, and housing need. <i>Detailed Influences:</i> environmental constraints, historic character & setting of York, nature conservation, Flood risk, Commuting, congestion, City & district centres, and the location of major development sites and opportunities. Broad locations for growth identified. Options presented regarding the location of future development. Option 1: Prioritising settlement accessibility Option 2: Prioritising existing trends Option 3: Prioritising housing need Option 4: A combination of the above	There is a need to identify Greenfield sites for development in York unless a low growth and high density option is pursued. Analysis focuses on constraints to development rather than opportunities to development.	Generally supportive of directing the majority of growth to within, or adjacent to, York's main urban area in preference to further expansion of villages. Support for the preservation of the historic character and setting of York. Considered that the correct factors had not been identified and that other factors over and above those identified.

ISSUES AND OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
		broad factors		
Reasons for change Evolution of the approach to reflect the SA, consultation responses and the refinement of the policy approach required for the preferred options stage.				

2.1.2 Core Strategy Preferred Options (2009)

The Preferred Options process tested approaches to the spatial strategy within the context of the now adopted RSS. This formally defined a settlement network, wherein York was a Sub-regional centre. This informed the settlement hierarchy previously identified at the Issues and Options stage which was taken forward to determine the type of acceptable development in different locations in the city. In addition, the key characteristics set out at the Issues and Options stage were taken forward as the main shapers for the city. The settlement hierarchy and city shapers were articulated into 3 spatial principles within the Core Strategy:

1. A sustainable settlement hierarchy;
2. Areas of Constraint; and
3. Approach to Future Development.

At this time there was no requirement to test levels of growth as this was dictated by the RSS. Consequently, the spatial strategy concentrated on identifying alternative opportunities to accommodate this growth.

The RSS set housing growth at 640 dwellings per annum between 2004-2008 and 850 dwellings per annum between 2008-2026. In order to create a Green Belt for York enduring until at least 2030, the 850 dwellings per annum growth target was projected forward between 2026-30. Employment growth was not specified in numbers but overall support was given to York's economic success to ensure the city fulfilled its role as a key driver in the regional economy through the provision of sufficient land.

The Major Development Opportunities and Sites were ongoing projects identified as having importance for delivering the spatial strategy. This included a brownfield first policy but also incorporated three greenfield sites (with permission) to meet the identified need. Further areas of search for future development were identified from areas outside of the key characteristics and refined through more site specific sustainability criteria to enable land to be identified outside of the Green Belt to ensure a degree of permanence following the Plan period.

Sustainability Appraisal

A Sustainability Appraisal was undertaken for the Preferred Options Core Strategy by City of York Council. This was published alongside the Core Strategy Preferred Options Consultation document in Summer 2009.

Table 2.2 summarises the Core Strategy Preferred Options Stage and consultation responses, including an overview of comments made by the SA.

Table 2.2 Summary of the SA of the Core Strategy Preferred Options

CORE STRATEGY PREFERRED OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
Spatial Strategy	PPS1, PPS12 Regional Spatial Strategy for Yorkshire and Humber (RSS)	The strategy articulated through spatial principles rather than a policy. These draw upon evidence base and policy guidance. The Principles are: Settlement hierarchy Areas of constraint Brownfield sites first The identification of future areas of search for development was based upon a mapping approach to take account of primary constraints on development e.g. flood risk, the historic character and setting and green infrastructure. The identification of Strategic sites and future areas of search would have set the Green Belt for 20 years until 2031.	Supportive of settlement hierarchy principle and areas of constraint. Recommends adding an assessment of access to services to the consideration of constraints. Principle 3 on sequence for site identification recommends strengthening brownfield first and adding consideration of impact on transport network.	Differing views on the scale of growth and the need to allocation greenfield/ green belt for development and be more explicit about urban extensions Continuing concern that the historic character of the city is not fully taken into account in the approach to development A number of alternative areas of search were proposed
Housing Growth	RSS PPS3	RSS defined the requirement as 640 2004-8 850 2008-26	The level of provision for housing needs to ensure there are sufficient homes to accommodate the growth of the current population given the predicted drop in household size in the forthcoming years. The strategic approach will need to limit the amount of unsustainable sites coming forward through identifying planned growth areas (as per the spatial strategy).	33% supported 850 figure and said the recession shouldn't be used to justify a lower figure 59% preferred a lower figure which they felt better reflected the need for housing
Employment Growth	RSS	A second stage Employment Land Review was commissioned by the council to establish the amount of predicted jobs growth and its distribution across sectors.		
Distribution of Growth	PPS1 PPS12	A new area added to the major developed opportunities and sites.	Supportive of settlement hierarchy principles and areas of constraint. Recommends adding	An indication of the scale of new development needed and the amount of land

CORE STRATEGY PREFERRED OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
	RSS (2008)	Strategy articulated through spatial principles rather than policy. These are: settlement hierarchy, Brownfield sites first. Other options not articulated. Sieve mapping approach to taking account of primary constraints on development e.g. Flood risk.	and assessment of access to services to the consideration of constraints. Recommends strengthening Brownfield first and adding consideration of impact on transport network.	required should be set out. Should include the regional or sub-regional picture from the RSS. The section should also set out how the overall principles might be translated into patterns of development on the ground and how there would be different ways of addressing the needs that are identified through different spatial options.
<p>Reasons for change</p> <p>Sharpening of policy approach which reflects further work on development options SA and points raised in consultation responses.</p>				

2.1.3 Core Strategy Submission (2011)

The submission Core Strategy set out the spatial principles for accommodating development and identified strategic sites using the previously established drivers and shapers from the Preferred Options Stage. The Spatial Principles were:

- SP1: Settlement hierarchy;
- SP2: Development Constraints;
- SP3: Sequential Approach to development.

Following the intentions of the Coalition Government to abolish the RSS and regional housing targets, Arup were commissioned to consider whether the RSS housing figures were still appropriate taking into consideration current evidence base and planning policy. Arup concluded that an appropriate annual average for York would be between 780-800 dwellings per annum. Taking this into account, the average housing target was set to deliver an average of 800 dwellings per annum over the plan period. The target was phased as follows to take into account the economic climate at this time:

- 635 dwellings per annum between 2011/12 and 2015/2016;
- 855 dwellings per year between 2016/17 and 2030/31.

Arup were also commissioned to evaluate the previous projections outlined within the Employment Land Reviews, which projected the creation of up to 1000 jobs per annum for use classes B1, B2 and B8. Following their review of the current economic evidence, Arup concluded that 960 jobs per annum was a realistic average for York over the

LDF period, although it would likely fall short in the short term and increase in the medium –long term due to the then current economic downturn.

In terms of development sites, the Core Strategy continued with a brownfield sites first policy as well as identifying areas of search for future development as outlined in the Preferred Options stage. Following these designations, the greenbelt would have endured until 2031 with any further proposed development subject to the Spatial Principles. An Allocations DPD was intended to follow the Core Strategy using the Spatial Principles to identify other sites to meet the needs of the city.

Sustainability Appraisal

A Sustainability Appraisal was undertaken for the Submission Core Strategy by City of York Council, which drew upon the outcomes of the Preferred Options SA outcomes. This was published alongside the Core Strategy Submission Consultation document in September 2011.

Table 2.3 summarises the Approach to the Core Strategy Submission and consultation responses including an overview of comments made by the SA

Table 2.3 Summary of the SA of the Core Strategy Submission Draft

CORE STRATEGY SUBMISSION STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
Spatial Strategy	PPS1 PPS12 RSS Draft NPPF	Housing and Employment Growth Evidence Base. Spatial principles approach retained. Areas of search as per PO stage Detailed Green Belt boundaries and site allocations to be determined through future Allocations DPD.	Continues to be supportive of the policy approach which has been amended to address access to services.	Continuing concern about the balance between level of growth and preserving the city's character. Presumption in favour of brownfield sites not consistent with national policy. Suggestions made to refine the settlement network and roles of places. Criticism of approach and outcome of areas of search for development.
Housing Growth	RSS PPS3 Draft NPPF	RSS provides start point. More recent national and local evidence regarding housing requirements refines this leading to proposal for: 635 pa- 2011/12 to 2015/16 855 pa - 2016/17 to 2030/31.	Policy will help to deliver enough housing to meet need and demand for housing.	Targets should be higher and reflect 2008 DCLG projection. There should not be a lower figure for early part of plan period. Others thought growth would not materialise and targets should be lower.
Employment	RSS Draft NPPF	Arup were commissioned to evaluate the previous		

CORE STRATEGY SUBMISSION STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
		projections in the Employment Land Reviews and concluded that 960 additional jobs per annum was a realistic average figure for the LDF period.		
Distribution of Growth	RSS (2008) PPS1 PPS12 Draft NPPF	Spatial principles approach retained. Further areas added to the major developed opportunities and sites.	Supports the overall approach taken by the 3 spatial principles set out in the Spatial Strategy.	Concern with the level of growth and preserving the City's special character and setting. Suggested further assessment needed to refine settlement and employment growth. Presumption in favour of Brownfield land not in line with national policy. Criticism of approach and outcome of areas of search for development.
<p>Reasons for change</p> <p>RSS revoked and its housing evidence base is outdated. New evidence base required to underpin the Core Strategy approach. Also, sharpening of policy approach which reflects further work on development options, SA and points raised in consultation responses.</p>				

The Core Strategy and its accompanying evidence base, including the SA/SEA, was submitted for examination to the Secretary of State on Tuesday 14th February 2012. It was taken to an Exploratory Meeting on 23rd April 2012 wherein the Inspector granted an extension for further works to be completed prior to an Examination in Public.

2.2 York's Local Plan

The decision for York to develop a Local Plan was based upon key planning policy changes and decisions in 2012:

1. The Government formally introduced the new National Planning Policy Framework (NPPF) in March 2012 replacing the previous Planning policy statements and Local Development Framework. This document replaced the LDF suite of documents approach in favour of the production of a Local Plan incorporating strategic and detailed policies together with site allocations;
2. The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013 came into force on 22nd February 2013. This followed consultation on an initial and revised Environmental Report regarding the effects of revocation of the regional strategy, both consulted upon on 2012. The revocation order of the Regional Strategy for Yorkshire and Humber revoked this document except for Policy YH9: Green Belts and Y1: York Sub area policy as well as the key diagram which showed the general extent of York's Green Belt. This was to ensure that the character and setting of the city would not be harmed through the revocation of the regional strategy whilst a local planning policy document was not adopted (as identified through the revocation Strategic Environmental Assessment (SEA));
3. Members granted approval of the Community Stadium. This required the reviewing of the retail evidence base/city centre policies used to underpin planning policy;

4. Moving to a Local Plan would include site allocations, critical to supporting and delivering growth. Considering allocations would enable a clearer and practical focus on viability and deliverability.

The substantial change to national guidance meant considerable change for the requirements of a local planning policy document. In light of this, the Core Strategy was withdrawn from the Examination process on 3rd August 2012 following a Full Council meeting on 12th July 2012 wherein Members voted in favour of the production of a NPPF compliant Local Plan.

2.2.1 Local Plan Preferred Options (2013)

The Preferred Options Local Plan drew upon the Core Strategy evidence base and consultation responses given that an evidence base had already been prepared and feedback from the public had been gathered.

A series of workshops to examine the vision for the city were convened to update the understanding of priorities for York as well as the spatial drivers and shapers. The outcomes of this fed into the Plan Strategy and relevant policies to underpin the development of the new Local Plan. The revised evidence base, the revocation of RSS and the introduction of NPPF as well as the visioning work led to a Preferred Options Strategy articulating a more ambitious plan for growth.

The revocation of RSS has required the plan to directly evidence the drivers of growth and determine the scale of change. Consequently, work was commissioned to re-look at housing and employment growth to ensure they were accurate, based upon current evidence and additionally, that they reflected an integrated approach to housing and employment growth.

A comprehensive Economic and Retail Growth and Visioning Study was undertaken by consultants Deloitte to understand the implications for the whole economy during the plan period. This looked at sector as well as overall job growth. The conclusions of this set out three options for growth between 2012-2030:

- The baseline scenario: 14,471 additional jobs (based upon Oxford Economic Forecasting's assessment of global and national changes in the economy applied at the York level);
- Scenario 1: Faster UK recovery – 20,197 additional jobs;
- **Scenario 2: Faster growth in key York sectors – 16,169 additional jobs.**

Scenario 2 reflected the Council's ambitions as set out in the York Economic Strategy. It was also felt to be most realistic in terms of reflecting the national economy. This option was therefore adopted as the preferred strategy for the lifetime of the plan.

Arup were re-commissioned to establish whether the housing growth targets were still valid following the previous work of the Core Strategy and in light of the economic evidence base. Based upon this review, the following options for housing growth were identified:

- Option 1: Baseline of 850 dwellings per annum ('Policy-off' scenario based upon projected population growth);
- **Option 2: 1090 dwellings per annum (To support the economic visioning evidence base and representing an integrated approach to housing and employment growth);**
- Option 3: 1500 dwellings per annum (To meet housing and employment growth as well as newly arising affordable housing need);
- Option 4: 2060 dwellings per annum (To meet housing and employment growth as well as existing and newly arising affordable housing need).

The housing growth option chosen to taken forward was Option 2. The testing of higher growth options showed that they were unlikely to be realistically deliverable. This equated to provision of at least 21,936 dwellings to be delivered between 1st October 2012 to 31st March 2030.

The spatial strategy continued to be underpinned by the spatial principles set through the core strategy process. Shapers of growth were amended to reflect current evidence within the city but remained as the Historic Character and Setting, Flood Risk and Green Infrastructure.

Identification and Analysis of Sites

A Call for Sites consultation asked landowners, developers, agents and the public to submit sites which they thought had potential for development over the next 15-20 years. The consultation ran between 29th August – 12th October 2012 and nearly 300 individual site submissions were received for a range of purposes, all of which had willing landowners.

In conjunction with the sites submitted through the call for sites process, further sites previously submitted to the Council for consideration through the Local Development Framework process, including the Call for Sites 2008, SHLAA and Core Strategy consultations, were included. Whilst no up-to-date information on these sites may have been submitted, it was deemed that there was previously an intention to develop the land and that this was worth reconsidering in the new assessment. Sites with existing or lapsed consent for residential or commercial use were also included.

The total number of land parcels identified for consideration was 732.

In order to identify those site allocations for inclusion with the plan, a site selection methodology was devised using the spatial shapers as the first criteria to be considered. This was a desktop assessment using GIS based data to accurately determine the sites location relative to the criteria and was considered the most appropriate way to identify the preferred sites for development whilst taking consideration for the York's existing environmental, social and economic assets. The assessment followed a 4 stage criteria methodology to identify the most sustainable sites for further more detailed consideration. Stages 1-3 included the spatial shapers (historic character and setting, which includes the greenbelt purposes; nature conservation designations; and open space and flood risk) followed by an assessment of access to services and transport at stage 4. All the sites were also subject to a

supplementary assessment of environmental considerations to understand more about key assets or issues within the vicinity. Following this process, the sites were appraised by internal officer and Member workshops for site specific comments before being allocated. For large sites over 5 hectares, whilst the stage 4 criteria ‘access to services and transport’ was applied, a judgement that these sites would have the ability to provide additional services to serve any new potential community was made and debated at the technical officer workshop. **Table 2.4** summarises the criteria used in Stages 1 – 4 of the assessment process.

Table 2.4 Initial Site Selection Criteria

Criteria
<p>Criteria 1: Environmental Assets protection</p> <p>Is the site wholly or partly within:</p> <ul style="list-style-type: none"> • Historic Character and Setting, which included the Green Belt purposes • High Flood Risk (Zone 3b) • Statutory Nature Conservation designations (SACs, SPAs, SSSIs, RAMSARs) • Regional Green Infrastructure Corridors • Sites of Special Interest for Nature Conservation (SINC) • Local Sites of Nature Conservations Interest (LNRs) • Ancient Woodland • (Site boundary amended as appropriate)
<p>Criteria 2: Open space retention</p> <p>Is the site or does it contain existing open space? (Site boundary amended as appropriate)</p>
<p>Criteria 3: Greenfield and high flood risk protection</p> <p>Is the site greenfield and within flood zone 3a? (Site boundary is amended as appropriate)</p>
<p>Criteria 4a: Access to facilities and services</p> <p>Is the site within distance of facilities and services? (NB: specific distances relate to facility or service)</p>
<p>Criteria 4b: Access to Transport</p> <p>Is the site within distance of transport modes/routes? (NB: specific distances relate to mode of transport/routes)</p>

The Call for Sites exercise allowed for the submission of all types of land –uses including residential, employment and retail development as well as ‘specialist’ development uses such as renewable energy, education, waste and minerals sites and Green Infrastructure purposes. The ‘specialist’ sites were removed from the analysis at this stage to be assessed separately through the Local Plan process for their suitability for that specialist use. Those sites that were submitted for the main development purposes of residential, employment and retail were grouped together. To give the best opportunities for site choice these sites were assessed for all potential built purposes (Residential, Employment or retail) for the next stage of the assessment.

All sites were analysed individually. However, in order to create the best opportunities for sustainable sites, where possible, individual sites were amalgamated into larger sites where they were adjacent to each other or overlapping.

A number of sites within the assessment already had planning consent for development and it was therefore deemed appropriate to remove these sites from the assessment as a decision has already been made on these sites regarding their suitability for development purposes. It was also considered inappropriate to amalgamate these sites with others without consent.

Table 2.5 and 2.6 summarise the outcome of the initial site screening process and highlights the number of sites taken forward for consideration at the Preferred Option Stage.

Table 2.5 Sites Taken Forward for Consideration at Preferred Options Stage

Stages	Number of sites
Considered sites through the Call for sites	732
Removed for specialist uses	-25
Removed as with planning permission or already complete	-256*
Removal of amalgamated sites	-173
Total number taken forward for analysis	273

* An additional 5 planning permissions were over 5 hectares and were therefore carried forward as strategic sites.

Table 2.6 Sites Removed Through Analysis

Stage of Assessment Process	Number of Sites removed
Total number taken forward for analysis	273
Criteria 1: Environmental Assets protection	-50
Criteria 2: Openspace retention	-29
Criteria 3: Greenfield and high flood risk protection	-2
Site size: Under threshold	-43
Site size: Over 100ha	-2
Sites taken forward to Criteria 4	152
Sites removed at Criteria 4	20
Sites taken forward for specialist workshops	132

A specialist Technical Officer Group were brought together to obtain site specific information on each of the sites, which made it through the site selection methodology. Concurrently, the sites were analysed for their viability in

the context of the Preferred Options. The outcomes of both of these processes informed the selection of strategic sites and allocations within the Preferred Options Local Plan.

Land requirements had increased from the Submission Draft Core Strategy, due to revisions to the growth projections, the need for sites and more area to accommodate the growth had also become greater. Following consideration by the Technical Officer Group, of the 132 sites considered, the following number of sites were allocated in the Preferred Options Local Plan.

Table 2.7 Number of Sites Allocated in the Preferred Options Local Plan

Site Allocations	Number
Strategic Sites Total	24*
Comprising:	
Mixed use: employment/housing	2
Housing	17
Employment	3
Retail	1
Leisure	1
Additional Housing Allocations Total	45
Additional Employment Allocation Total	14
Total Allocations	83

* This includes sites with outstanding planning permission over 5 ha removed.

In addition, 8 safeguarded land parcels were identified to meet long-term development pressures and enable the Green Belt to be set with a fair degree of permanence beyond the Plan period to ensure the preservation of the special character of York.

Sustainability Appraisal

A Sustainability Appraisal was undertaken for the Preferred Options Local Plan jointly by City of York Council and AMEC. This was published alongside the Local Plan Preferred Options Consultation document in Summer 2013.

Table 2.8 summarises the Local Plan Preferred Options Stage and consultation responses, including an overview of comments made by the SA.

Table 2.8 Summary of the SA of the Local Plan Preferred Options

LOCAL PLAN PREFERRED OPTIONS	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
Spatial Strategy	NPPF	<p>Drivers: Housing and employment growth (see below)</p> <p>Shapers: As previously identified in the Core Strategy – historic character and setting, flood risk and green infrastructure.</p> <p>24 Strategic sites were identified to meet the spatial strategy and housing/employment growth targets.</p>	Continues to be supportive of the policy approach, particularly now the housing and employment growth is integrated so York will meet its needs within the authority boundary.	
Housing Growth	NPPF	Arup review of evidence that underpins objectively assessed need. Options considered ranged from 850 – 2060. Preferred option - 1090	Preferred approach will not have significant negative effects and will support the forecast job growth. It will not meet the SHMA target for affordable housing.	<p>Provide local level policy to guide phasing of development and provide an allowance for windfall sites</p> <p>2011 household projections will lead to an undersupply of homes.</p> <p>The Council should plan more positively and aspire to the higher housing figures of Option 3 (1,500 dwellings) or Option 4 (2,060 dwellings) to meet economic and affordable housing needs.</p> <p>Provision should be lower – below 850 per yr and give priority to brownfield sites.</p> <p>The persistent record of under delivery of housing means the Council should be looking at a 20% buffer.</p>
Employment	NPPF	Deloitte were commissioned to undertake an Economic and Retail Visioning and Forecasting Study. The set out 3 options for growth.		
Distribution of Growth	NPPF	The move to a Local Plan and the combination of NPPF and the revocation of RSS leads to a more specific policy approach to setting out the distribution of growth. Combination of policies used to set the strategic context, roles of places patterns of development and the implementation of strategic sites. Policy added regarding the	The assessment has identified that those preferred options that comprise the spatial strategy would have a positive effect across many of the SA objectives.	A large number of responses were received in relation to the distribution of growth. There were a number of general comments received alongside some support for the policy. There were also a large number of objections received, with the majority of which were concerned with the level of growth being too high and the problems this may create on infrastructure, services and effect on the environment.

LOCAL PLAN PREFERRED OPTIONS	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
		safeguarding of land.		
<p>Reasons for change</p> <p>New evidence base preparation for underpinning the Strategy. Also, sharpening of policy approach which reflects further work on development options, SA and points raised in consultation responses through the Core Strategy.</p>				

2.2.2 Further Sites Consultation (June/July 2014)

Further sites, amendments to boundaries and new evidence for Preferred Options site allocations were received through the Preferred Options consultation for consideration as part of the Site Selection/Allocations process. Any new sites were taken through the site selection methodology and where successful, were taken to Technical Officer Group for further comments to ensure a fair and equal testing of all possible sites. Where site amendments or further evidence had been received, this was also taken to the Technical Officer Group for further discussion. The outcomes of this process were presented as part of the Further Sites Consultation (June/July 2014). This was focussed on presenting:

- New residential and employment/retail sites with potential;
- Changes to Strategic Sites and Allocations;
- The Council's requirements for safeguarded land and identifying new sites;
- Identifying new strategic sites for open space;
- The renewable energy methodology and identified potential sites;
- The Gypsy, Roma, Traveller and Travelling Showpeople Accommodation Assessment;
- New sites for educational purposes; and
- New sites for transport purposes.

It identified that an additional 7 sites had potential for housing and 3 sites had potential for employment use. In addition, amendments to some of the Preferred Options Allocations and Strategic Sites were consulted on to reflect received consultation responses and evidence base submitted.

2.2.3 Local Plan Submission (2014)

The Local Plan Submission document has predominantly stayed with the Preferred Options approach. To ensure this, the Council have retested its evidence base and found that very little has changed and the Preferred approach has been taken forward. Each of the key influences are discussed in turn below and together document the process of the selection of the preferred development option and rejection of alternatives.

Spatial Drivers

Economic forecasts

Work on the City of York Local Plan has drawn on Econometric Forecasts from Oxford Economic Forecasting (OEF) to support the economic and housing components of the Plan through the *Economic and Retail Growth and Visioning Study* (2013). At the Preferred Options stage three different economic scenarios were tested:

- The baseline scenario: 14,471 additional jobs (based upon OEFs assessment of global and national changes in the economy applied at the York level);
- Scenario 1: Faster UK recovery – 20,197 additional jobs;
- Scenario 2: Faster growth in key York sectors – 16,169 additional jobs.

The publication in December 2013 of the draft Strategic Economic Plans by the two LEPs of which is York is a partner revealed that there is a difference of view on York's economic future when the Experian/REM forecast when compared to the OEs forecast used in the Local Plan. Since that time work has been carried out to analyse and understand the reasons for these differences. This has involved discussions with the two forecasting houses and support from the Regional Economic Intelligence unit in Leeds. In addition, a third trend based forecast was obtained from Cambridge Econometrics to help compare the economic forecasts and mitigate the risk later in the process for further economic testing.

The analysis of the differences between the models is that the overall scale of growth within the Experian/REM model is 6 months earlier than the Oxford model and as a consequence is more pessimistic. Once these were updated, the outcomes of this forecast were found to be much closer to the OE model. The Council has therefore decided to continue using the OE forecasts in the Local Plan. The close alignment of the two models is considered to show as accurate a forecast as possible to underpin the Local Plan. It is considered that the scenarios presented at the preferred Options stage remain reasonable alternatives.

However, the review of these figures has highlighted that the most realistic scenario in the current economic climate is the baseline forecast. The Submission Local Plan therefore takes forward the baseline scenario as opposed to scenario 2 as at the Preferred Options stage. Scenario 2 represented stronger growth in York sectors which would have added an extra 1,500 additional jobs to the trend based baseline position whereas the updated evidence shows that the York economy now supports nearly 113,000 jobs and a trend based forecast of growth to 2030 with an additional 13,500 jobs. This forecast has been used to provide the basis for determining the range and scale of land requirements within the Plan through an analysis of how sector growth feeds in to use class requirements. Overall, approximately 160,000m² of floorspace is required to meet the economic requirements.

Housing Requirements

The NPPF states that housing requirements should be evidenced using technical work based upon an objective assessment of the relevant data and trends apparent from this data. Any policy considerations should be separate

from the objective assessment of housing needs and should be considered following the determination of the objectively assessed need. To this end, consultants, Arup, were commissioned to revisit their work regarding housing requirements from the Preferred Options stage in light of the updated employment forecasts and new Government Statistical sources such as the 2012 based population projections. These have influenced the revised options for housing growth in the following way:

- The most recent ONS forecasts of population growth and the associated household forecasts provided by DCLG are influenced by the post 2008 recession and may underestimate future rates of growth. It is Arup's opinion that an improving position should be assumed in the longer term.
- The Oxford Econometrics model of economic growth has been validated using other models as stated previously. The trend based forecast is now more optimistic than their previous forecasts.
- Household formation and size assumptions have been revised based upon newly release population projections.

These factors have meant that the baseline figure for housing growth is lower than the ones derived from the forecasts at the Preferred Options stage (1090 dwellings per annum). The reasoning for this is that the improved economic circumstances have had the effect of bringing forward forecast job growth, with more of the forecast job growth already taking place. This leads to an associated reduction in forecast population growth. Furthermore, the forecasts last year predated the release of the 2011 household projections and as a consequence used the much more optimistic household formation rates from the 2008 based projections. The new forecasts considered the evidence on what drives household formation and sought to strike a reasonable balance between the over optimistic 2008 rate and the unduly pessimistic 2011 rate of household formation. It is this factor that has had the most impact on the difference in the projections. This is a very important consideration as the assumptions made about future household size can create large variations in the scale of housing growth.

The revised options considered for housing growth as a result of the above are:

- Option 1: 850 dwellings per annum (Demographic trend led forecast);
- Option 2: 869 dwellings per annum (Economic led forecast).

Although options 1 and 2 set out the trend based requirements, the guidance is clear that housing requirements must take account of objectively based need. To consider this, a review of the Strategic Housing Market Assessment (SHMA) was undertaken, which concluded that the outcomes of the original assessment, that 790 affordable homes per annum are required to address both forecast requirements and the existing backlog, was a robust estimate. Consideration of how this can be delivered in the context of maintaining a realistic position on the delivery of new homes is taken forward in a separate policy.

Additionally, further provision is required to address the backlog from previous under delivery of housing. This equates to an additional 126 homes per annum on top of the trend based options. It has been recognised that it is that this need can be met within the first 5 years of the plan given the uplift that would be required during this time. Consequently, this requirement has been incorporated into the housing delivery requirements over the plan period.

The following option is therefore being taken forward:

- Option 3: 995 dwellings per annum (objectively assessment need (126 dwellings pa) including economic led scenario (869 dwellings pa).

This option equates to a requirement to accommodate 16,980 dwellings over the lifecycle of the plan. In addition, a 20% buffer is added to the supply of housing providing an uplift of 174 dwellings per annum for the first 6 years to address previous under provision as required by the NPPF. The target overall will be 995 dwellings per annum over the lifetime of the plan therefore but within the first 6 years, the supply will be accommodate 1170 dwellings.

Sites Allocations Identification

The site selection work carried out at the Preferred Options stage and Further Sites Consultation has led to 820 sites being looked at for their development potential. The outcome of this process has led to:

Table 2.9 Site Selection Process

Stages	Number of sites Considered
All sites considered for residential purposes	820
Sites removed from process at Preferred Options	-449
Sites removed at :	
Criteria 1: Environmental Assets protection (PO stage)	-50
Criteria 1: Environmental Assets protection (FSC stage – excluding resubmitted sites)	-19
	(69)
Criteria 2: Open space retention (PO Stage)	-29
Criteria 2: Open space retention (FSC stage - excluding resubmitted sites)	-2
	(31)
Criteria 3: Greenfield and high flood risk protection (PO stage)	-2
Criteria 3: Greenfield and high flood risk protection (FSC stage - excluding resubmitted sites)	0
	(2)
Site size: Under threshold (PO stage)	-43
Site size: Under threshold (FSC stage - excluding resubmitted sites)	-1
	(44)
Site size: Over 100ha (PO stage)	-2
Site size: Over 100ha (FSC stage - excluding resubmitted sites)	-2
	(4)
Sites taken forward to Criteria 4 (PO stage)	152
Sites taken forward to Criteria 4 (FSC stage - excluding resubmitted sites)	18
	(170)
Sites removed at Criteria 4	20
Sites removed at Criteria 4	15
	(34)
Sites taken forward for specialist workshops (PO stage)	132
Sites taken forward for specialist workshops (FSC stage - excluding resubmitted sites)	3
	(135)

The Strategic Sites have followed a 'Strategic Sites Delivery Framework' developed by City of York Council wherein they are required to provide evidence to support their site, particularly in relation to any identified

showstoppers within the technical analysis, sustainability appraisal or consultation responses. This evidence has been used as a basis for ongoing dialogue with landowners and developers to establish whether sites analysed as with potential for development are suitable, deliverable and viable in line with the requirements of NPPF prior to their inclusion within the Local Plan Submission.

Additionally, ongoing Viability assessment has provided revised assumptions for general housing sites, which has revised the housing numbers incorporated in the Local Plan.

DRAFT

3. Context and Baseline

3.1 Introduction

This section provides an overview of the baseline and context that has informed the development of the SA objectives used to assess the sustainability of the draft Local Plan. It includes a review of other relevant policies, plans and programmes (**Section 3.2**) and baseline data (**Section 3.3**) and culminates in the identification of key sustainability issues to be considered by the Local Plan and SA (**Section 3.4**).

3.2 Review of Relevant Policies, Plans, Programmes and Sustainability Objectives

The purpose of reviewing policies, plans and programmes is to:

- ensure that the relationship the Local Plan has with other documents is recognised; and
- ensure that any relevant environmental protection and sustainability objectives contained within these documents are integrated into the SA.

The requirement to undertake a context review and set out environmental and wider sustainability objectives is also set out in the SEA Directive. An ‘Environmental Report’ required under the SEA Directive should include:

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

A detailed review of relevant policies, plans and programmes was undertaken as part of the preparation of the SA Scoping (May 2013) and is reproduced at **Appendix C**. The principal policy objectives relevant to the Local Plan and SA identified from the policy review are summarised in **Box 1**.

Box 1	Policy Objectives Relevant to the Local Plan and SA
	<ul style="list-style-type: none"> • York should be a model sustainable city with a quality built and natural environment and a modern integrated transport network; • Reduce greenhouse gas emissions to tackle climate change; • Protect and enhance habitats and conservation areas in York with no detrimental impact on biodiversity; • The improvement of air quality for human health;

Box 1 Policy Objectives Relevant to the Local Plan and SA

- Implement the waste hierarchy by reducing landfill and encouraging reducing, recycling and reusing materials;
- Ensure access to local services and local transport provision;
- Reduce the reliance of car based transport;
- Encourage high standards of energy efficiency;
- Enhance and maintain water quality in York as well as encouraging prudent use of water;
- Re-use of existing land and buildings (brownfield land);
- Protection and maintenance of the Green Belt. The Local Plan should focus on setting a suitable Green Belt boundary for York;
- Provide a mix of housing types to meet the needs of the people;
- Provision of sites to allow growth of the City to accommodate needs into the future;
- Create and maintain local character and distinctiveness;
- Consideration for the historic baseline and protection and enhancement of the historic environment to increase its contribution into the future;
- Respect and preserve sites of archaeological interest and their setting;
- Ensure the availability of open space in the local area;
- Encourage existing and future prosperity of tourism;
- Contribute towards renewable energy targets;
- Protect floodplains from development;
- Ensure that new development does not increase flood risk;
- Encourage development and infrastructure to be developed in tandem;
- Continue Science City York;
- Develop York's key influences in the region;
- Support expansion of educational facilities including Heslington East;
- Improve connectivity to the region;
- Promote social inclusion;
- Maintain economic growth to secure long-term future of the city and jobs;
- Create mixed and vibrant communities;
- Support adaptation in response to climate change.

3.3 Baseline Information

An essential part of the SA process is the identification of the current baseline conditions and their likely evolution. It is only with a knowledge of existing conditions, and a consideration of their significance, that the issues which the Local Plan should address can be identified and its subsequent success or otherwise be monitored.

The SEA Directive requires that the evolution of the baseline conditions of the plan area (that would take place without the plan or programme) are identified. This is useful in informing assessments of significance, particularly with regard to the effect that conditions may already be improving or worsening and the rate of such change. Where information on these trends is available it has been identified.

The SA Scoping Report (May 2013) included an analysis of baseline conditions and trends. To ensure that this analysis is based on the most up-to-date information available, it has been updated as part of the preparation of this report. This is presented at **Appendix D** and is summarised in the proceeding sub-sections.

3.3.1 Population and Households

Population

As at the 2011 Census, the City of York had a population of 198,051. This represents an increase of 9.4% since the 2001 Census and the latest projections anticipate that York will grow by a further 14.5% between 2012 and 2037.

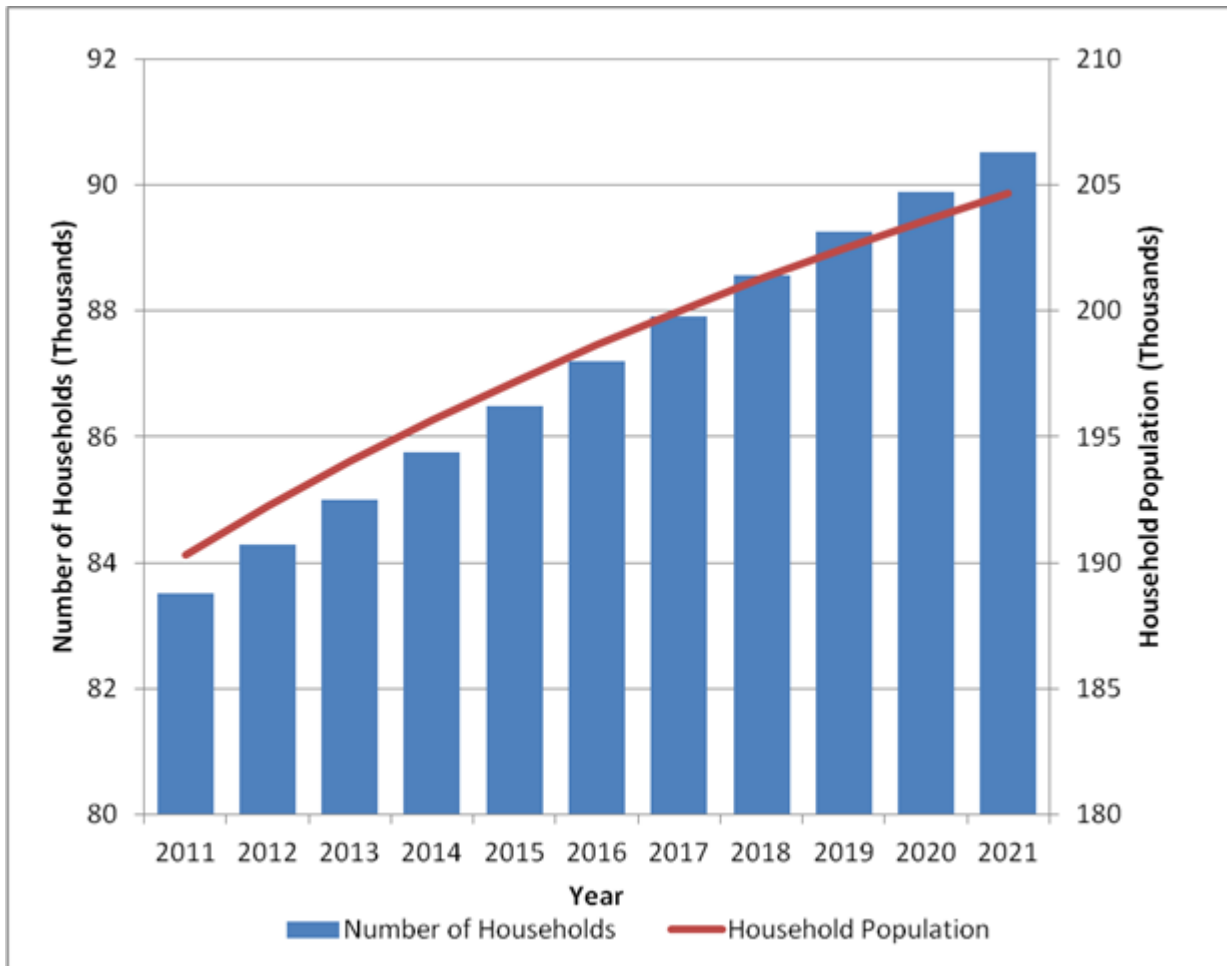
The proportion of people aged 65 and over has increased between 2001 and 2011. This trend is predicted to continue with the cohort expected to increase the most for people aged 80-84 and 85 plus, in line with increasing life expectancy. There have also been significant increases in the proportion of 15-19 years olds (17.9%) and 20-24 year olds (39.1%), which reflects the two successful universities located within the City. The population pyramid represents this with a large population in the 20-24 year old cohort.

The White British population accounts for 90.2% of York's population with the Black and Minority Ethnic (BME) population, which includes white Irish, white other and gypsy groups, accounting for 9.8%. Overall, this data indicates that there has been an increase in BME communities in York since 2001.

Households

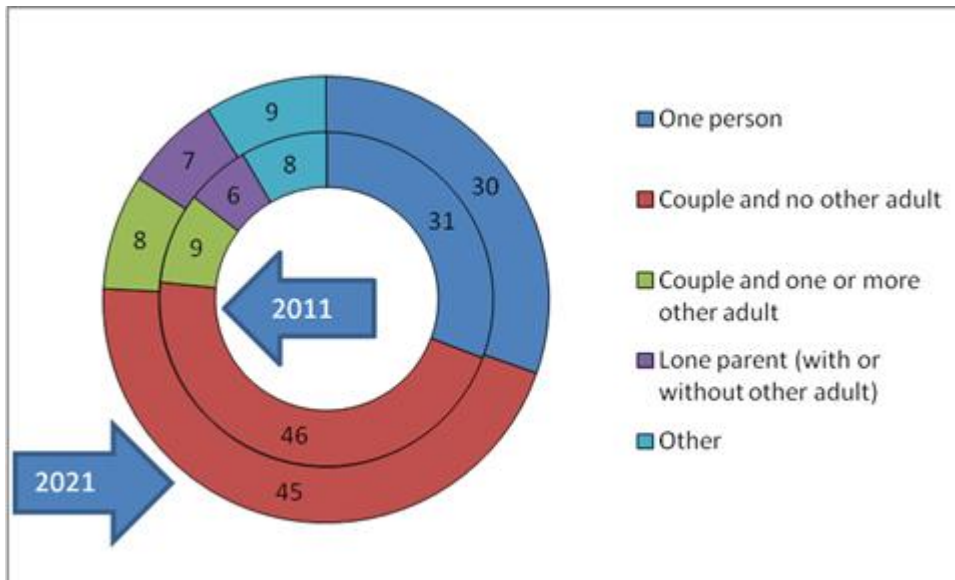
The 2011 Census revealed York to have 83,552 households. This constitutes an 8.6% increase since 2001. The latest Interim Household Projections (ONS, 2013) forecast an 8% increase in households between 2011 and 2021 (see **Figure 3.1**). The York and North Yorkshire Strategic Housing Market Assessment (SHMA) (2011) had previously anticipated an increase of approximately 850 households per annum.

Figure 3.1 Household Projections – 2011 to 2021



The average household size is expected to remain at 2.28 persons per household in the short term before decreasing. York’s household composition is also set to change with an increase in single person households, of which the half are anticipated to be aged over 65 (see **Figure 3.2**).

Figure 3.2 Household Composition 2011/2021 (%)



Housing Development

The Council's Annual Monitoring Report (AMR) shows that there have been 6,007 net dwellings built between 2004-2013. In 2011/12, there were 321 net completions which is the lowest completion rate over the last 9 years. This is accepted to be as a result of the economic downturn and its associated impact on house builders and the figure for 2012/13 and building rates have been higher in subsequent years. The number of consents also hit an all time low in 2011/2 but in 2013/14 returned to 2007 (pre-crash) levels.

The breakdown of dwelling types has not been reported in 2013 or 2014 but the 2010/11 AMR showed that 59.7% of all completions were flats/apartments, 21.5% town houses/terraced properties, 6.5% semi-detached and 8.7% detached homes.

During 2011/12, 151 affordable homes were built in York. 142 of these were approved through the planning process and the remainder have been acquired by Registered Social Landlords and Housing Associations. The SHMA (2011) outlined the need for 790 dwellings per annum until 2016 to enable the backlog and newly arising affordable housing demand to be met. The highest level of demand was for medium to larger properties ranging from 2-4+ bedrooms.

Key Issues from the Baseline:

- York's population and household numbers are projected to increase;
- York has a high need for housing (including affordable housing) which it needs to address;

- Housing delivery has decreased since the economic downturn;
- There is a need to plan for a mix and type of accommodation to suit all household types.

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

The population and households in York will continue to grow but understanding to what extent will be determined by levels of natural change and migration. As at the 2011 Census, the City’s population was 198,051 and current trends see this increase by 14.5% between 2012 and 2037. It is anticipated that the number of people aged 18-24 will increase in line with York’s student population at the higher educational establishments in York. Similarly, the projections indicate that the number of older people is increasing, which will put different pressures on service provision and housing needs.

Without policy intervention, and given the population projections are trend based, it is not unreasonable to assume that an increase of population will occur. However, the recent evidence base for York suggests that the economic downturn has had an impact on household formation and that the rate of growth may be below that being predicted in previous trends. There may also be a change in need through changing household structures as evidence suggests more single person households, higher occupancy/ multiple person households and older persons accommodation is growing.

Should no policy be in place, the market would determine the type and location of housing development. Where suitable housing is less likely to be available locally, it may drive some people to seek housing further away from the City, which is less sustainable than meeting housing need within the authority area given the social, economic and environmental implications from trip generation. Furthermore, given the financial pressures, householders are likely to become in more need of affordable housing options, which may not be delivered without policy intervention. This could make sectors of the population vulnerable or exposed to limited accommodation choices. Evidence in the SHMA already considers that the shortage of suitable property sizes is having a disproportionate impact on the City’s capability to address a backlog of housing need and this situation may become exacerbated should a policy on housing growth and affordable housing delivery not be implemented.

The compulsory quality of homes provided across York in the future will largely be dependent upon national guidance. Any changes to this guidance should be reflected in the development and therefore the provision of good quality and decent homes in the future. Currently, the Government’s Decent Homes Standard, Lifetime Homes – Lifetime Neighbourhoods, the Code for Sustainable Homes and Building Regulations set out the criteria for the quality of housing to be provided.

3.3.2 Economy

Economy and Employment

York has seen a number of structural changes to its economy over the past 20 years which has meant it has had to diversify from a predominantly manufacturing base and re-invent itself. The City is now a hub for competitive industry and research expertise in biosciences, healthcare and medical research, biorenewables, environmental research, IT and digital and creative technologies. Recently York was recognised as being one of the most resilient economies in the North and one of the fastest growing in the country (Eskogen, 2011^[1]).

Subsequent analysis shows that more than one in five private sector jobs in York are employed by a London headquartered business. To put this in context, fewer than one in 40 private sector jobs in York were accountable to businesses headquartered in near neighbour Leeds^[2].

York is a popular tourist destination attracting 7 million visitors per year^[3] with its unique heritage being the key attraction. The City is also seen as a gateway to the wider region. Correspondingly, the tourism industry employs a significant workforce, although this can be seasonal work.

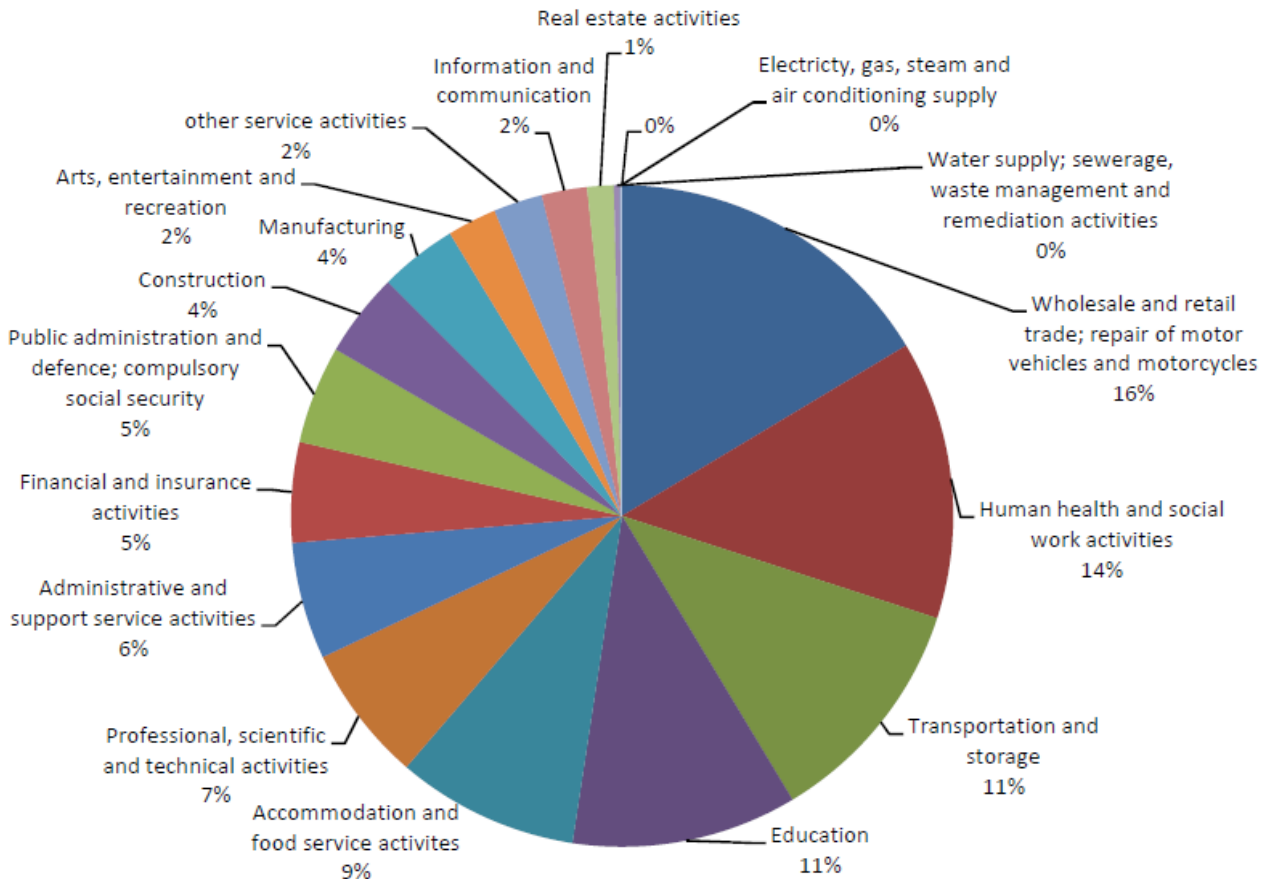
Figure 3.3 provides an overview of total employment by sector in the City at 2011.

^[1] Eskogen (June 2011) Economic and Retail Growth Analysis and Visioning Work Economic Baseline Report (June 2013).

^[2] Centre for Cities report 2014. Cities Outlook 2014

^[3] York City Council

Figure 3.3 Total Employment by Sector, 2011



According to York’s Labour Market Profile (Nomis, June 2014), the number of employees in York has grown from 100,800 to 102,500 between 2010 and 2011. Job density is similar to levels in 2007 (0.88) having recovered from a low in 2010. The number of people unemployed and claiming job seekers allowance reached a peak in 2010 compared with the last 10 years with the majority of claimants claiming within the last 6 months. In 2013 York had the fifth lowest rate of people claiming JSA.^[4]

York has the seventh highest percentage of the working age population with NVQ level 4 or above qualifications (over 40%)^[5] and the high skills base is acknowledged to be a key reason behind York experiencing one of the lowest rising unemployment rates in the country. The relationship between Leeds and York is also recognised as complementary and York is identified as being economically independent to Leeds (but is within the Leeds City Region).

^[4] Centre for Cities report 2014 Cities Outlook 2014

^[5] Centre for Cities report 2014 Cities Outlook 2014

The 2011 Census revealed that 66.9% of York’s population was of working age (16-64). The economically active population is 80.8% of the working age population with 75.9% of the total in employment.

The Annual Survey of Hours and Earnings (ASHE)^[6] show that the mean annual income in York in 2013 was £32,593, which is above the equivalent regional figure but below the national average.

Table 3.1 Full-time Earnings in Pounds (£) (ASHE 2013)

Earnings (population)	York	Yorkshire and Humber	England and Wales
25% earn less than	18,715	18,075	19,218
40% earn less than	23,149	21,799	23,775
60% earn less than	30,378	28,341	31,000
70% earn less than	33,758	32,150	35,648
Mean income	32,593	29,218	33,660

Source: ASHE 2013 (provisional) Table 8.1a Weekly pay - Gross (£) - For all employee jobs: United Kingdom, 2013

The Index of Multiple Deprivation (IMD) shows that the number of areas deprived in York due to access to employment has decreased between 2004 and 2010 from 10 to 6 in the top 20% most deprived areas in the country and none in the top 10% most deprived areas .

Key Issues from the Baseline

- A key challenge is to achieve economic growth in a sustainable manner that protects the environment whilst allowing social and economic progress that recognises the needs of all people;
- The unemployment rate gap between York and the UK has increased through 2011/12 showing unemployment is decreasing in line with the reduction in JSA claimants;
- York has a highly skilled labour force which has had a positive influence on the City’s economic stability and employment rates;
- The relative dependence on public sector employment is decreasing with the increase in private sector business and employment;
- The number of City Centre vacant shops is decreasing;
- Footfall has been negatively affected by external factors effecting spend in the City.

^[6] ONS 2012 Annual Survey of Hours and Earnings 2011

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

As a result of the recent global recession and associated credit crisis, the international economy has become increasingly competitive. Economic growth has slowed and there is less finance available. The result of this is an uncertain and volatile economic climate with increasing competition between cities around the UK and globally for investment, skilled labour and jobs. York has been recognised as one of the most resilient economies in the North of England and is part of wider networks such as the Leeds City Region and North Yorkshire. However, these market forces make the future uncertain.

Within the Economic Strategy for the City, there is a determination to make it the most competitive City of its size, not only in the UK but globally. Some of the work delivering this strategy is independent of the Local Plan and therefore it is anticipated that progress may be made in a ‘policy-off’ scenario, although the timescales for this may be slower without the steer of a complimentary economic planning policy. Furthermore, York is a key tourist destination with tourism benefitting the City across many different industry sectors. This is likely to continue due to the existing historic assets within the City, particularly the City Centre. There is ongoing work to ensure York maintains this role and whilst policy intervention would further support this, it is not unreasonable to assume that York would continue to be a desirable destination regardless.

Should York’s economy grow in line with the aspirations, a key policy for delivering sites/land would be through the Local Plan to ensure it is in the right locations for the future of York. Without this policy, market forces may dictate the location of development and this may conflict with other City assets/visions. The NPPF’s ‘presumption in favour of sustainable development’ in this case would preside and this may be in conflict with what is considered to be sustainable for York.

There is a clear link between York’s population and the continuance of a vibrant economy through the working age population. In order to support economic growth, there needs to be a relevant workforce with the skills and/or training ability to support businesses. York will continue to have two universities, two higher and further education colleges and primary/secondary education facilities. York’s strength through the economic downturn has been recognised as its highly skilled workforce. These institutions would be better supported through policy intervention should there be any intended growth of the establishments or in the population; particularly for delivery of primary and secondary education to all.

3.3.3 Deprivation and Equality

Deprivation

The IMD ranks the City of York 244th out of 354 local authorities where a rank of 1 is the most deprived in the country and a rank of 354 is the least deprived. Deprivation in York has reduced since 2004 when it was ranked 219th out of the 354 authorities. Looking at income specifically, the City of York was ranked 136th out of 354 local authorities in 2010, an improvement from the rank of 127th in 2007 and 120th in 2004. There has also been a

marked improvement in the number of Super Output Areas (SOAs) which rank within the top 20% most deprived areas nationally. This number has decreased from 11 SOAs in 2004 to six SOAs in 2010. There were no SOAs within the top 10% most deprived areas in 2010.

Access to Housing and Suitable Accommodation

The average house price in York was just over £210,000 in June 2014 having increased from £64,358 in January 1995^[7] (see **Figure 3.4**). Research from Lloyds Bank (cited in The Press, York's local newspaper) noted that York was the 20th most expensive city in terms of house prices^[8]. The average house price is now nearly six times the annual average salary of a York resident and exemplifies why the need for affordable housing within the City is great because people earn less than the average needed to own a home.

The IMD shows that between 2007 and 2010 barriers to housing improved within York with the number of SOAs registering within the 20% most deprived areas decreasing from 12 to 8.

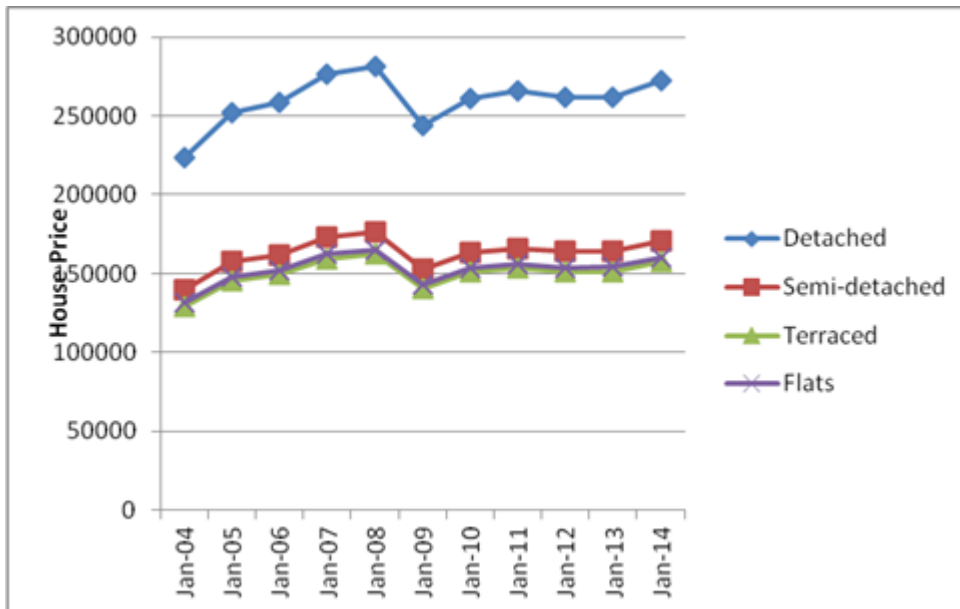
The Housing Strategy Statistical Appendix (HSSA) data returns for 2013^[9] (as of 1st April 2013) highlight that there were 3,739 households on the City of York Council housing register. The demand is mainly for one or two bedroom properties but there is also a small demand for more family housing. The return also stated that there were 39 publically owned dwellings which were vacant. The HSSA stated that in there were 1,422 vacant homes of which 510 had been vacant for over 6 months.

^[7] http://www.home.co.uk/guides/house_prices_report.htm?location=york&all=1

^[8] http://www.yorkpress.co.uk/news/11065202.York_among_the_most_expensive_places_in_Britain_to_buy_a_house/

^[9] <http://www.communities.gov.uk/housing/housingresearch/housingstatistics/housingstatisticsby/localauthorityhousing/dataforms/hssabpsa1011/hssadatareturnns1011/>

Figure 3.4 Average House Prices^[10]



There is demand for more sites for the Gypsy and Traveller community within York as it is known that the existing sites are at capacity and some people from this community live in conventional dwellings, which does not necessarily suit their lifestyle. In terms of Showpersons, York has been identified as a location which would be good to provide permanent and stopover sites given its central location within the region and transport network access for travelling to showgrounds as part of their job.

The demand for older person housing is also set to increase due to the aging population of York. The Older Persons Housing Needs Survey^[11] states that there are about 30,000 older person only households in York. There is a higher proportion in rural areas as compared with urban parts of the local authority area and over 75% of older households are owner-occupiers.

Access to Leisure and Community Facilities

York has over 300 sports clubs and a great variety of physical activity programmed all year round in various locations across the City. The City has two Council-run swimming pools and gyms as well as other private gym

^[10] <http://www.landregistry.gov.uk/public/house-prices-and-sales/search-the-index>

^[11] Fordham Research (2010) Older Person's Accommodation and Support Needs.

and swimming facilities. There is support for the “just 30” campaign to get people undertaking an activity for 30 minutes of moderate exercise a day and targeted campaigns for different age groups to take up a leisure activity. Further to this, the Council area has nine formal parks and gardens as well as numerous informal open spaces.

Aside from the sports and open space facilities in York, there are a number of social facilities such as community halls, venues for clubs and societies to meet, libraries, youth facilities and public houses.

Issues from the Baseline

- York has become less deprived but still has pockets of high deprivation which need to be addressed;
- Demand for affordable homes is high;
- York has areas which feature within the top 20% most deprived in the country in terms of barriers to housing, although the number has decreased between 2007-2010;
- A major barrier to housing is the disparity between the cost of housing and how much people earn as well as access to funding such as mortgages;
- The provision of other types of homes for the elderly, including nursing homes, residential care homes and warden assisted living as well as support services will also need to be developed;
- There is a recognised need for Gypsy and Traveller and Showpeople sites.

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

Evidence from the IMD has shown that York has become less deprived. Improvements have been made due to and independently from the planning system. It is not unreasonable to suggest that this trend may continue without policy intervention.

However, one of the main inputs into the IMD is major barriers to housing which may be exacerbated should the market not provide suitable accommodation. Given the current financial pressures, householders are likely to become in more need of affordable housing options, which may not be delivered without policy intervention given current development viability. This could make sectors of the population vulnerable or exposed to limited accommodation choices. Evidence in the SHMA already considers that the shortage of suitable property sizes is having a disproportionate effect on the City’s capability to address a backlog of housing need and this situation may become exacerbated should a policy on housing growth and affordable housing delivery not be implemented.

There is a recognised need for Gypsy and Travellers accommodation sites. It is unlikely that this will be provided without planning policy intervention.

Policy support for local provision of services and facilities is also important. Whilst there are parades at present as well as independent shops, it would be beneficial for new development to include or respond to a lack in provision to support the population. It is unlikely that this would be market-led, particularly in smaller scale schemes, and therefore a policy off scenario may see services, facilities and open space in some areas become overstretched or conversely, unviable.

3.3.4 Climate Change

City of York Council and the Local Strategic Partnership (Without Walls) are committed to tackling climate change through the Climate Change Framework and Action Plan (2010 – 2015). This will form the foundation for a coordinated response to climate change across the City and aims to:

- reduce carbon emissions and other greenhouse gas emissions in line with national targets; and
- better prepare the City to adapt to likely future changes in climate.

Between 2005 and 2010 city-wide emissions began to fall, and reduced by 13% from just over 1.3 million to 1.1million tonnes of CO₂ (DECC, 2011). In 2010, the City generated approximately just under 10MW of renewable energy, and since the introduction of the Government's Feed- in – Tariff (which offers financial cash back for generating renewable electricity) an additional 4.5 MW of installed capacity has been installed across York (Ofgem).

The Council has also set ambitious targets to reduce carbon emissions across the City by 40% by 2020^[13] in line with the Mayor of Covenants and Friends of the Earth targets. This is being delivered through a Sustainable Energy Action Plan (SEAP) adopted in 2011.

Key Issues from the Baseline

- Climate change will have an impact in York at a variety of levels;
- Targeted campaigns can work including those aimed at design and sustainability as well as lifestyle changes.

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

Climate change is occurring and will continue regardless of policy intervention but without it, the City's contribution towards it and its effects on the population would be exacerbated. As a Council, York has committed to reducing climate change and its impacts through the Climate Change Framework and Action Plan. Delivery of

^[13] A Climate Change Framework for York2010-2015

this is both supported by and is independent to planning policy. It would not be unreasonable therefore for progress towards reducing the City's impact to be achieved through education and behavioural change, although this progress may be more gradual than with the influence of policy intervention.

To understand the potential impacts of climate change on York, a Local Climate Impact Profile (2010) was produced which is a risk based assessment of significant vulnerabilities to weather and climate now and in the future, was carried out in 2010. The study shows that with changes in the climatic parameters, York can expect to experience the following effects:

- Increased frequency of extreme rainfall events;
- Changes in seasonal rainfall distribution causing drier summers and wetter winters;
- Increased average daily temperatures (2.5°C);
- Increase frequency of heat waves.

Further to this, the study concludes that the main direct impacts on the City of York area are likely to be:

- Increased flooding (pluvial and fluvial);
- Overheating;
- Changes to biodiversity and ecosystem health;
- Pressures on water resources;
- Increased risk of disease and pests (non human).

In addition to the direct impacts, the indirect impacts of climate change will be more frequent flood events through more frequent and intense rainfall which may lead to damage to properties, infrastructure and stress on existing and emergency services. This would also have an effect on biodiversity, which could lead to ecosystem changes.

A policy-off scenario would particularly leave a gap in determining the most suitable location for future development and thus support for minimising the need to travel and promoting integrated infrastructure systems and transport networks, which would minimise use of the car and therefore carbon emissions.

The compulsory quality of development and requirements for the generation of renewable energy in response to climate change across York in the future will largely be dependent upon national guidance. Currently, the Code for Sustainable Homes and Building Regulations set out the criteria for the quality of development and requirements for sustainability. Furthermore, non-compulsory guidance from BREEAM for commercial premises sets out measures for sustainability. This guidance is not statutory, however, and would be given more support should it, or an equivalent, be included within planning policy as a requirement.

3.3.5 Transport

York is one of five local authorities in the Yorkshire and Humber region that experiences a net in-flow of trips to work, with 22,803 and 18,204 journeys to and from the York area respectively (Census, 2011). It also has nearly 71,000 internal travel to work trips daily. A relatively high proportion of journeys in York are under 5km (56% compared to 40% in England as a whole). For commuting trips, travel by car is the dominant mode. However, use of the car for commuting within York (53% mode split) is lower than for England and Wales (63%), and significantly lower than for inward commuters (81%).

York has a higher proportion of people who cycle or walk to work compared to England and Wales and the Yorkshire and the Humber region. In addition, cycling levels have increased significantly since the Cycling City York programme commenced in 2008.

Bus patronage has remained roughly static at around approximately 15m passenger trips per year, of which approximately 2.8 million are Park & Ride passengers. However, accessibility (to the City Centre) by public transport varies significantly. Access is generally good along the urban corridors, with services comprising a mixture of high-frequency local bus services and Park & Ride services, serving five Park & Ride sites on the perimeter of the City that can reach the City Centre within 30 minutes. The particular ‘accessibility gaps’ are principally in the outlying smaller villages, Strensall (which has a high-frequency service but a journey time to the City Centre of more than 30 minutes) and parts of the north western sector of the York urban area. Villages on the main interurban bus routes have better access to the City Centre than those not on these routes. Vehicle ownership levels are significantly higher in rural areas of the York area, in some cases more than double that for urban wards.

York is well connected by rail to many other areas of the country. York is the second busiest station in Yorkshire and Humber (after Leeds).

The 1994/98 five-year average for killed and seriously injured road casualties was 137^[15]. By 2009, this had reduced by more than the Council’s 45% reduction target, to 60 and had fallen again by 2013 to 58^[16]. Between 1994 and 2009, the number of children killed or seriously injured as road casualties fell by 57% and slight road casualties have fallen by 22% (Local Transport Plan Monitoring).

Issues from the Baseline

- Traffic levels in York have remained largely unchanged since 1998, despite continued development over this period;

^[16] <http://road-collisions.dft.gov.uk/indicators/casualties-by-road-owner/york>

- York experiences a net daily in-commute of approximately 4,599 trips from the Yorkshire and Humber Region (Census 2011);
- The number of people cycling has increased since the introduction of the Cycling City York programme;
- High frequency bus services match well to the areas in York with the highest number of households without a car;
- Vehicle ownership levels are significantly higher in rural areas of York;
- York is well connected by rail to many other areas of the country, but services to Harrogate are of a low frequency and rail links to the south east of the City including Hull are relatively poor ;
- Killed and seriously injured road casualties have reduced by at least 45% (from the 1994/98 average);
- In the past two years, City of York Council has made successful bids to Government for funding programmes to improve public transport and encourage travel behaviour change to reduce dependency on the private car for travel.

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

The City currently has five park and rides (with funding for two more to help to decrease traffic to and from the City Centre and alleviate congestion on the road network) and a central railway station with frequent trains accessing the region and beyond. Cycling and walking is high due to the flat topography of the City making it easy for people to use this mode of transport as well as seeing improvements to associated infrastructure through funding and promotional schemes. It would therefore be reasonable to anticipate that a continuation of the current situation is likely in terms of bus travel, access to trains and cycling and walking access. However, evidence suggests that car ownership is growing and with this there may be an equivalent increase in traffic that may have negative effects, particularly at peak hours where certain roads are known to be at capacity.

Transport planning under the Local Transport Plan sets the framework for improvements to the network based upon need, some of which would be delivered through the Local Plan and the rest independently of planning policy. Planning policy would certainly support and help to deliver the aspirations set out in the Local Transport Plan.

A policy-off scenario would particularly leave a gap in determining the location of development and thus support for integrated infrastructure systems and transport networks, which would minimise the use of the car and support sustainable travel modes. Co-location of development with sustainable transport is paramount and without policy intervention may negatively affect the City’s ambition to become a more sustainable and environmentally friendly city. Whilst behavioural change and education can go so far in influencing the population, planning policy and the location of development could dramatically support sustainable development through its location helping to minimise any impact of new development on the existing infrastructure. Furthermore, the City aspires to become

the first low emission city which may not be delivered to its full potential without delivery mechanisms and requirements set out in planning policy.

Interrelated to transport is ensuring people can live and work within the City to minimise commuting and additional trips to work and services. Currently the City supports a net inward commute to work which is thought to be exacerbated due to the affordability of living within the authority. This imbalance impacts on the road network particularly at peak time and is not likely to be rectified without policy intervention and a balance between housing and economic growth factoring in infrastructure improvements.

3.3.6 Health

The national trend for life expectancy is increasing in line with the known aging population in York. Average life expectancy in York is now 79.6 for males and 83.2 years for females^[17] and the figures remain consistently above the regional and national average, particularly for males.

Currently vital statistics data shows that the main causes of death within York for both males and females are cancers and illnesses connected to the circulatory system. Aside from these two causes, deaths from heart disease are also high.^[18]

The proportion of York's population that stated they have very good health was nearly 50% at 2011. Only 4.1% stated they had bad or very bad health, lower than regional or national figures of 6% and 5.6% respectively.^[19]

Issues from the Baseline

- The general health of citizens in York is good;
- The main priorities to address are obesity, particularly in children, alcohol and physical activity.

Likely Future Scenario Based upon the Baseline - "Policy off" Scenario

The populations' health is out of the direct influence of planning policy and relies on education and personal commitment of individuals. It is likely that current health trends will continue and that obesity will continue to become increasingly prevalent. The City has a number of sports centres, parks and greenspaces to support physical exercise and health and well-being.

^[17] ONS 2013 Life expectancy at birth and at age 65 by local areas in England and Wales, 2010-12

^[18] Nomis (2011 Deaths 2010)

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=6275327&c=york&d=13&e=13&g=6383071&i=1001x1003x1004&m=0&r=1&s=1410222119346&enc=1&dsFamilyId=1943>

^[19] ONS 2011 Census (cited on Nomis)

<http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=6275327&c=york&d=13&e=6&g=6383071&i=1001x1003x1004&m=0&r=1&s=1410222370424&enc=1&dsFamilyId=2503>

A policy-off scenario would see the status quo position with incremental improvements to different areas. Planning policy could help support the identified need for open space, green infrastructure and built sports facilities through protection and delivery of facilities and spaces. This would help to support the health of the population more than by incremental changes alone.

3.3.7 Resources, Energy and Waste

Resources

Currently, York's ecological footprint is 4.72 global hectares (gha) per person^[20], which is just over the UK average of 4.64 gha per person. York's footprint has decreased since 2001 and 2006 when the footprint was 6.3 gha and 5.38 gha per person respectively. The City of York Community Strategy (Without Walls) sets a target for the progressive reduction of York's ecological footprint to 3.5 gha per person by 2033.

Yorkshire Water state that the reservoirs are 72% full currently (September 2014) but still promotes water efficiency to safeguard the resources. The average person uses 65,000 litres per year or 180 litres per day^[21]. As people own more appliances which use water, water efficiency is paramount to ensuring that water resources are available in the future.

Water for York is abstracted from the River Ouse and River Derwent. Increased development and population growth will lead to further water resource abstraction, which may impact on the two rivers.

The Yorkshire Water Resources Management Plan (2014^[22]) identified a range of supply and demand management measures to ensure that the Yorkshire Water Region will remain in surplus through the period to 2039/40. This forecast was based upon the economic climate at the time and the associated impact of new development on water use. Water supply will be managed through a series of demand reduction initiatives, and development of new and existing assets including leakage reduction, water efficiency and additional abstraction.

Energy

The average domestic consumption of electricity and gas has been decreasing since 2006 with York consistently below the national average (DECC, 2012). Similarly, trends in the consumption for commercial and industrial gas and electricity show a decrease in consumption. The Council has been promoting energy efficiency through campaigns and schemes to help householders reduce their consumption and become more energy efficient. This has proved successful in targeted locations.

^[20] Taken from the results released in October 2009 by the Stockholm Environment Institute

^[21] Yorkshire water (2012)

^[22] Yorkshire Water (2014) Water Resource Management Plan

Waste

The City of York has a positive decreasing trend in respect of tonnes of waste produced. The amount of waste that was landfilled has reduced to 55.1% (2011/12) from a 2004/05 baseline figure of 82.2%. Similarly, there has been a significant increase in the amount of recycling that has occurred with the vast majority of residents having a kerbside recycling collection service. Future waste management issues are being considered through a Joint Local Plan between York and North Yorkshire.

Issues from the Baseline

- York has reduced its overall consumption of energy resources over the past few years and this trend is likely to continue;
- A key consumer of resources is transport;
- External factors such as the weather are likely to continue to impact on consumption;
- The Council is committed to resource and carbon reduction through energy efficiency;
- Water resources are not likely to have a significant effect on York as the household consumption has been built into Yorkshire water's demand/supply models. Water efficiency, however, is still required;
- The amount of waste produced in York is reducing whilst the levels of recycling and composting have increased in line with a decrease in landfill.

Likely Future Scenario Based upon the Baseline - "Policy off" Scenario

Legislation, publicity and education has been focussed on ensuring that the message to reduce, re-use and recycle to minimise waste, the use of materials and overall consumption is implemented through appropriate schemes and adopted through behavioural change. Trends in York are in line with this with the amount of waste recycled increasing and the amount landfilled decreasing. Evidence from DECC shows that energy consumption in York continues to decrease and that the City's consumption is now consistently below the national average. As recycling schemes and energy efficient measures continue to be implemented, it is reasonable to assume that these trends will continue.

The compulsory quality of development and requirements for the generation of renewable energy and use of materials in response to climate change and efficiency across York in the future will largely be dependent upon national guidance. Any changes to this guidance should be reflected in new development. Currently, the Code for Sustainable Homes and Building Regulations set out the criteria for the quality of development and requirements for sustainability, including renewable energy generation. Furthermore, non-compulsory guidance from BREEAM for commercial premises sets out measures for sustainability. This guidance is not statutory, however, and would be given more support should it, or the equivalent, be included within planning policy as a requirement.

Water for York is abstracted from the River Ouse and River Derwent. Increased development and population growth will lead to further water resource abstraction. Yorkshire Water's Water Resources Management Plan 2014 has considered the demand and supply of water for the forthcoming 25 years and as a result of revised demand forecasts, is not forecasting a deficit in the supply/demand balance.

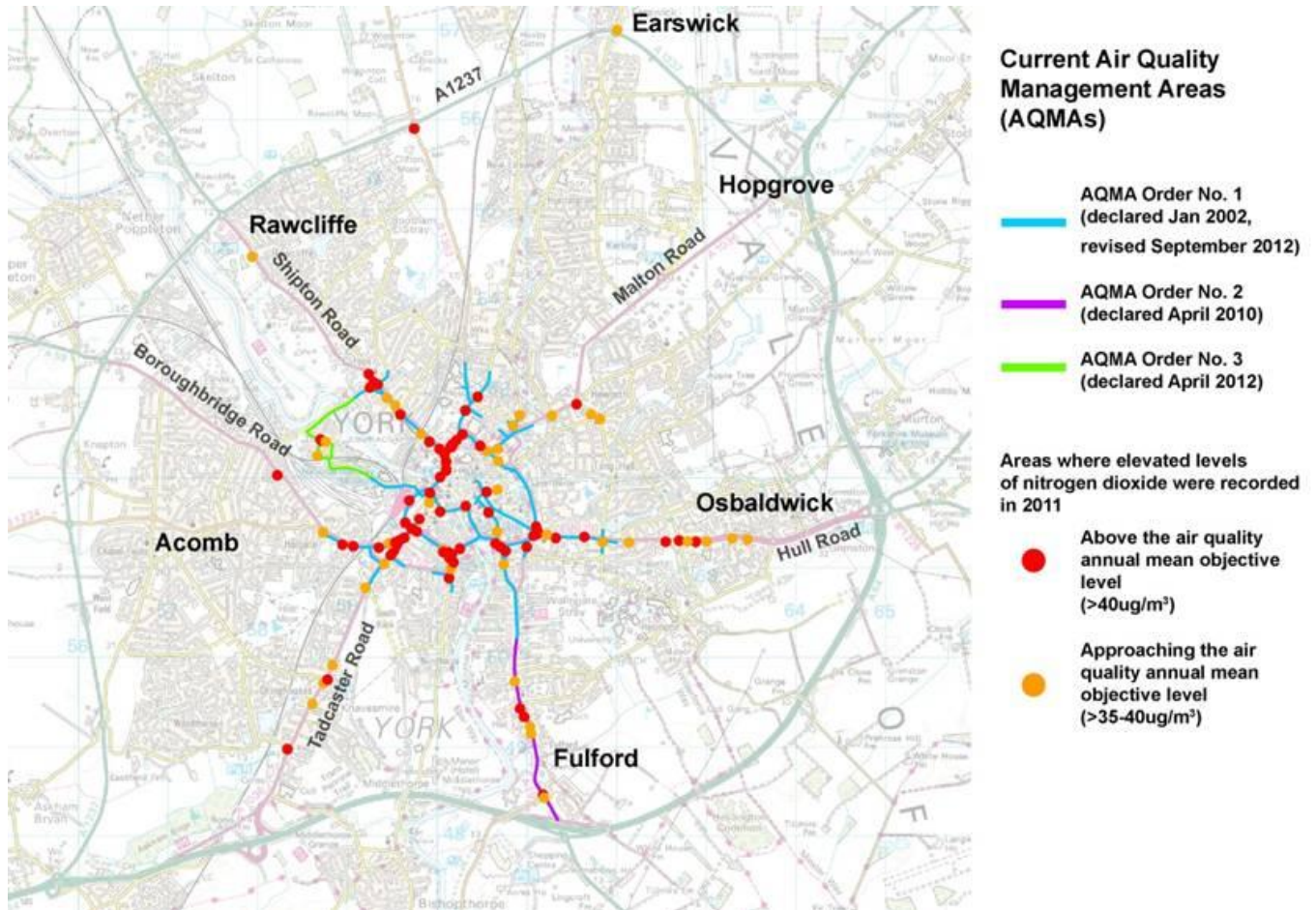
3.3.8 Air Quality

Current Air Quality Management Areas (AQMAs) are shown in **Figure 3.5**. Concentrations of NO₂ within the City Centre AQMA have continued to increase year on year at some locations in the City since 2006, despite the introduction of two Air Quality Action Plans (AQAPs). The health based annual average NO₂ objective continues to be exceeded at many locations around the inner ring road and more recently further air quality issues have been identified in suburban locations. A second AQMA was declared in Fulford in April 2010 and a third on Salisbury Terrace in April 2012. In addition, the City Centre AQMA has recently been amended. The revised order reflects the wider area of the City Centre now known to be affected by breaches of the annual average NO₂ objective and includes some additional areas where breaches of the hourly objective for NO₂ have also previously been detected (George Hudson St / Rougier St).

There needs to be a more holistic approach to carbon and local air quality management to ensure all emissions to air are minimised as far as possible. An overarching Low Emission Strategy (LES)^[23] is now in place to address this issue.

^[23] York City Council 2012 Low Emission Strategy <http://www.jorair.co.uk/reports/les/Adopted%20LES%20final.pdf>

Figure 3.5 Current Air Quality Management Areas



Key Issues from the Baseline

- York’s air quality continues to decline in the City Centre;
- A combination of measures is needed in order to improve air quality including a model shift in transport and moving to low emission technologies with supporting infrastructure;
- York’s ambition is to become the first low emission city.

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

York’s air quality continues to decline within the City Centre. There are currently three designated AQMAs and numerous hotspots wherein the recommended legislative objectives for NO₂ continue to be breached. Nitrogen dioxide is formed during all combustion processes (primary NO₂), and can also be formed in the atmosphere from

other pollutants (secondary NO₂) but the main source of nitrogen dioxide in York is traffic. Poor air quality is a leading factor in people's health and continually high pollutant levels negatively affect this.

Improvements to air quality do not solely rely on planning policy. For example, changes can be made to commercial transport fleets to use low emissions technologies. However, the Council aspires to be the first low emission city and has adopted a Low Emission Strategy (LES) to provide a holistic and consistent approach to dealing with this issue. The LES could not be fully implemented without the Local Plan as a delivery mechanism meaning that air quality would continue to decline and continue to negatively affect the health of the population. Planning policy would help to ensure a consistent and cumulative approach to the consideration and mitigation of air quality within development and planning applications.

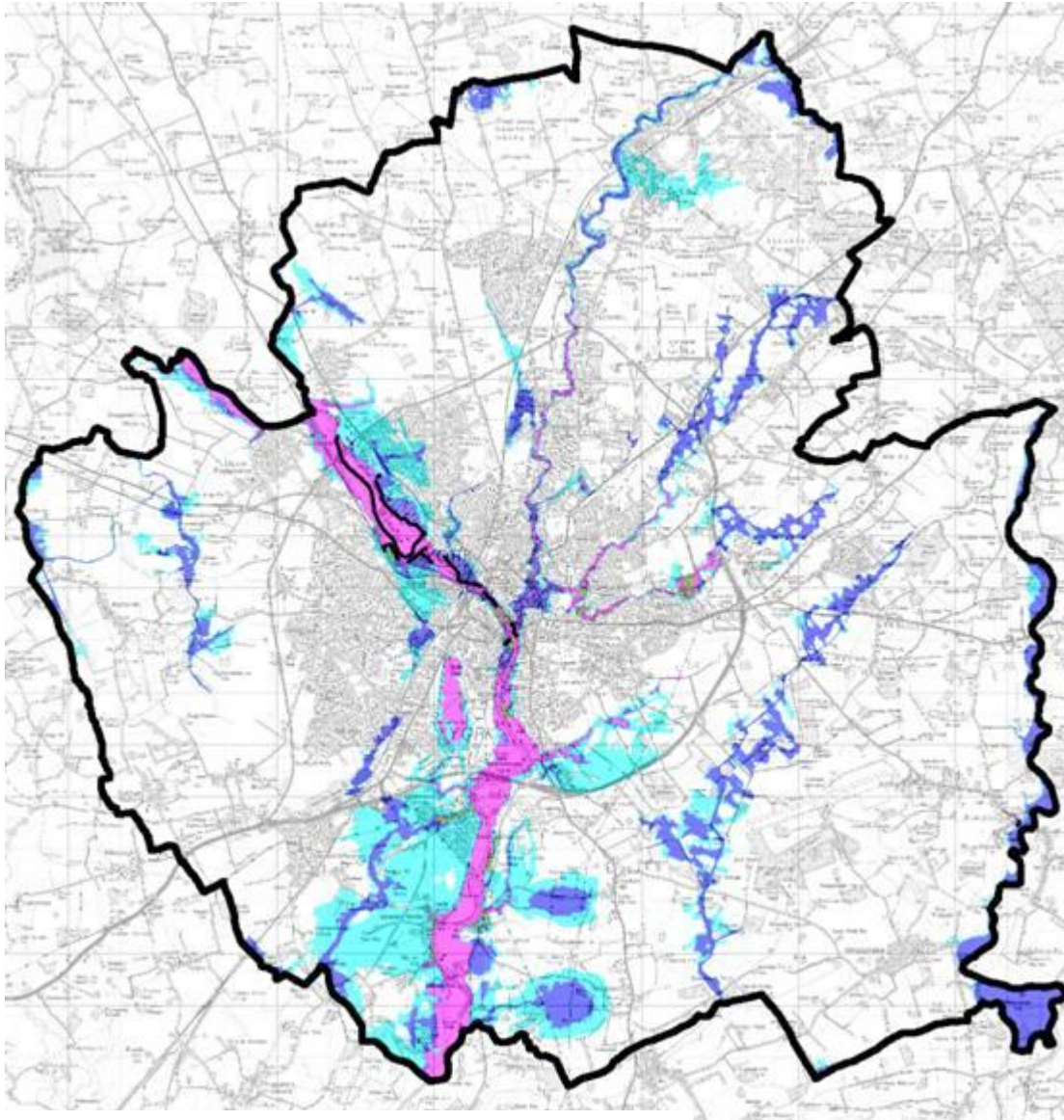
3.3.9 Water, Flooding and Flood Risk

Flood Risk






There is a well documented history of flooding in York from the River Ouse, with the records for the City dating back to 1263. More recently, the Ouse hit the local and national media headlines as a result of widespread flooding in autumn 2000 and high river levels in September 2012. **Figure 3.6** shows the areas within York that are categorised as being in Flood Risk Zones 2 and 3 within York's Strategic Flood Risk Assessment^[24].

^[24] York City Council (2011) Strategic Flood Risk Assessment

Figure 3.6 Flood Risk in York



SFRA 2011 Flood Risk Zones Legend:

<p>All Uncoloured Areas</p>     	<p>Zone 1: Less than 1 in 1000 annual probability of flooding in any year (<0.1Percent)</p> <p>Zone 2: Between 1 in 100 and 1 in 1000 annual probability of flooding in any year (1Percent to 0.1Percent)</p> <p>Zone 3a: Areas between 1 in a 100 and 1 in 25 annual probability of flooding in any year (1 to 4 Percent)</p> <p style="padding-left: 20px;">3a - Defended up to 1 in 50, Flood Risk between 1 in 50 and 1 in 100 (2 to 1 Percent)</p> <p style="padding-left: 20px;">3a - Defended up to 1 in 100 (1Percent)</p> <p>Zone 3a(i): Developed areas with up to a 1 in 25 or greater annual probability of flooding in any year (4 Percent or greater)</p> <p>Zone 3b: Areas with up to a 1 in 25 or greater annual probability of flooding in any year (4 Percent or greater)</p> <p>Flood Defences</p>
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Flood risk is predicted to alter in the future due to climate change and sea level rise. Climate change may result in different rainfall patterns, which could increase flood risk and as a result of sea level rise the flood risk in the tidal parts of the Ouse catchment area will increase.

Water Quality

According to the Vale of York Profile (Natural England^[25]), groundwater quality is stated as good in the east but poor in the west of the City. All the rivers that have been assessed are of good chemical quality, including the rivers Ure and Ouse in the west. The ecological quality of the rivers in the area is classed as moderate, although a small stretch of river associated with the tributaries of the River Wharfe is classed as poor, as is the River Foss.

The Humber River Basin Management Plan^[27], and Swale, Ure, Nidd and Upper Ouse Catchment Abstraction Management Strategy^[28] state that in terms of surface water chemical status, the River Ouse is ‘failing to achieve good’ chemical status. Along the River Ouse, water quality improvements have been made in the past decade with the biological water quality of the Ouse classified as ‘excellent’ to ‘good’ in 2000. Furthermore the chemical status of groundwater aquifers is ‘good’ in the west and ‘poor’ in the east of the NCA with the groundwater status in the Vale of York (in the Yorkshire Ouse, Nidd and Swale priority catchment) identified as suffering from groundwater failures in 2001-2005 at certain locations due to a need for action on pesticide.

Table 3.2 summarises the percentage of the rivers relevant to York assessed for their biological and chemical quality/status.

Table 3.2 Water Quality

	% at good ecological status or potential		% assessed at good or high biological status		% at good chemical status		% at good status overall	
	2009	2015 target	2009	2015 target	2009	2015 target	2009	2015 target
Yorkshire Derwent	11	14	5	11	33	33	11	14
Swale, Ure, Nidd & Upper Ouse	28	28	48	48	67	100	28	28
Derwent Humber	39	41	65	74	100	100	39	41

^[25] Natural England (2012) NCA 28: Vale of York (NE 367)

^[27] A: Current state of waters, Environment Agency (December 2009)

^[28] Environment Agency (March 2004)

Key Issues from the Baseline

- York has a history of flooding which needs to be taken into consideration in planning for the future of the City;
- Flooding is still likely and will affect people and businesses in York;
- There is a need to minimise future flood risk arising from the impacts of climate change;
- Water quality is generally good with the main reasons for poor quality linked with agricultural farming practices.

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

York has a well documented history of flood risk as the City lies at the confluence of the Rivers Ouse and Foss. Flood protection measures are already in place with improvements to these largely out of the remit of planning. York is legally obliged under the Water Act to deal with flood risk management and policy. However, flood risk in the future is set to get worse under the influence of climate change and may see York experiencing more frequent flood events with negative effects on people, property and businesses.

The Strategic Flood Risk Assessment sets out the areas at most risk from flooding. A policy off scenario may have a negative effect should development not be located where it is at low risk from flooding, although the policies in the NPPF should direct development to those areas least likely to be at risk of flooding.

Development needs to be focussed in low risk areas to avoid negative impacts on fluvial and pluvial flooding. Policy intervention would have a positive influence in using the evidence base to direct development accordingly and mitigate its effects in the future in both new schemes as well as existing areas.

The 2008 survey results from the Environment Agency state that the quality of the Rivers Ouse and Foss are very good in terms of their chemistry, biology, phosphates and nitrate concentrations. Improvements to river quality are not directly related to planning policy and therefore it is reasonable to assume that this trend will continue although policy intervention could support this trend.

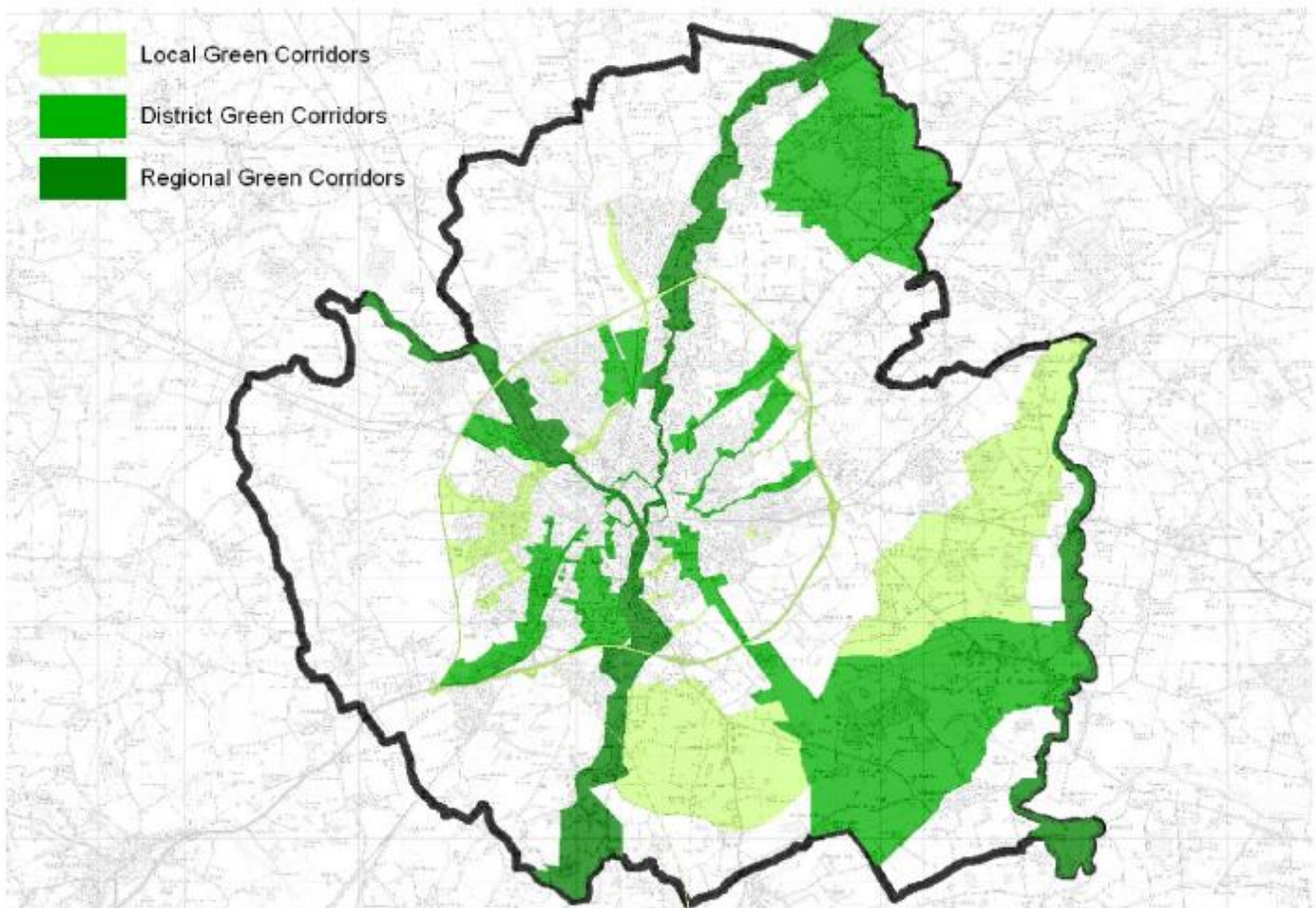
3.3.10 Green Infrastructure and Biodiversity

Green Infrastructure (GI) encompasses all “green” assets in the authority area, including parks, the river corridors, street trees, managed and unmanaged sites and designed and planted open spaces. A number of these are also recognised heritage assets within the City. For example, the greenspaces alongside the City Walls, the historic Strays and the designated Registered parks and Gardens such as Museum Gardens all contribute to open space and recreational areas. Together, all of these assets make a green infrastructure network cross the City with a variety of uses including: nature conservation, open space and green corridors and linkages.

Green Corridors

York has a number of nationally, regionally and locally important green corridors, as identified in **Figure 3.7**.

Figure 3.7 Green Corridors



Biodiversity

Within a relatively small area (272 square kilometres) the York area boasts a range of sites with habitat and conservation value. These sites include ancient flood meadows, species-rich grasslands, lowland heath, woodlands and wetlands, which in turn is home to a variety of European protected species including bats, great crested newts, otters and other rare species such as the Tansy Beetle.

York contains a number of nationally and internationally important designated nature conservation sites (see **Figure 3.8**). Using the North Yorkshire system of a more regionally based assessment of sites, City of York

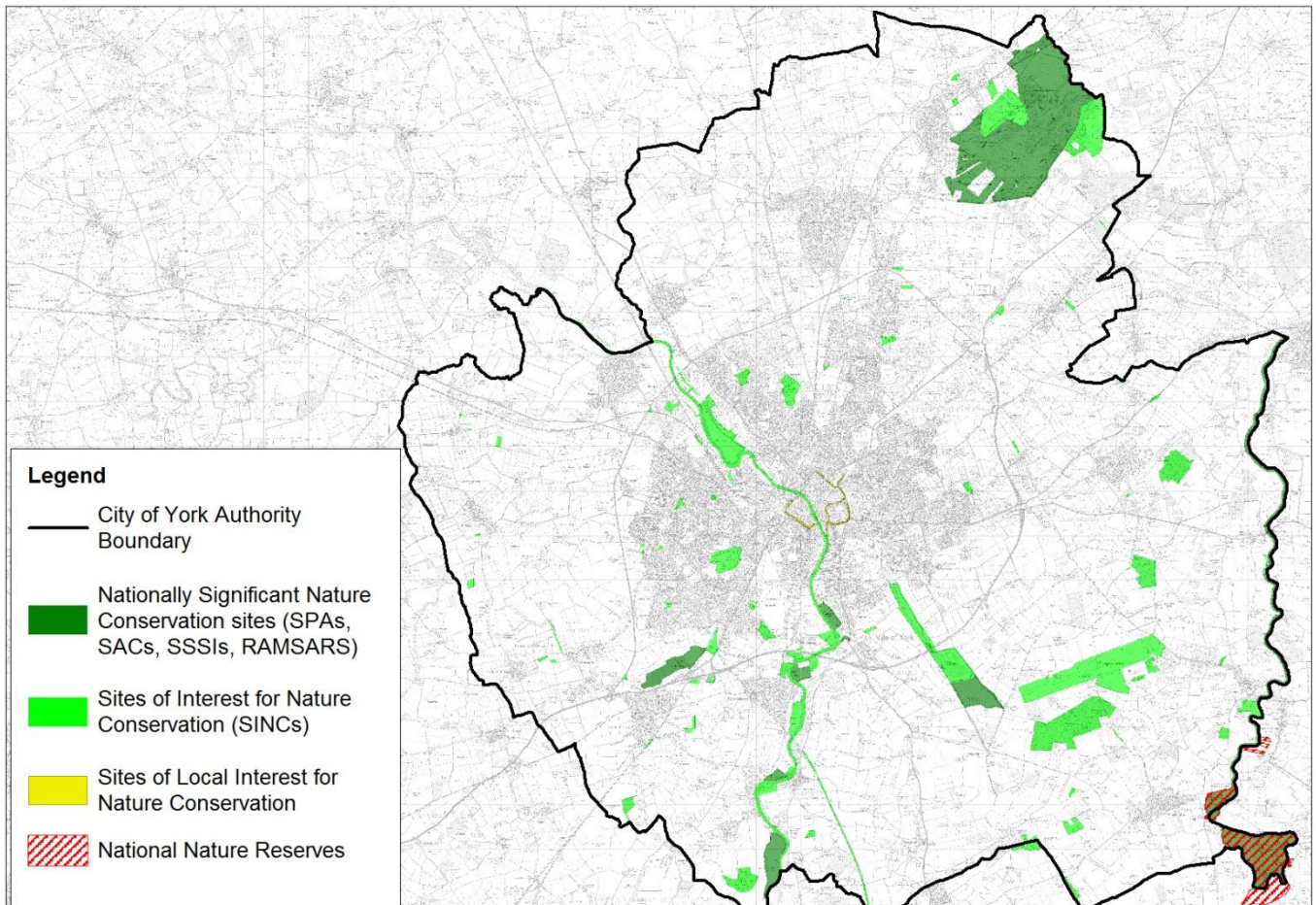
Council has undertaken an audit of sites to provide an understanding of the nature conservation and biodiversity value within the authority. The audit identified that currently there are 886 hectares of wildlife habitats, which represent only 3.2% of the total authority area. It also identified SINC sites which are sites which of local importance to York. The original Biodiversity audit (1996)^[29] found 42 Sites of Importance for Nature Conservation (SINC) within the authority boundaries, nine Sites of Special Scientific Interest (SSSI), three of which were also of international significance as Ramsar, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). The most recent audit^[30] (2010) has found that five of these sites no longer meet the requirements but that a further 49 new sites fulfil this criteria. Furthermore, 87 additional sites have been recorded for their wildlife value but do not formally make the criteria to be a SINC.

DRAFT

^[29] York City Council (1996) Biodiversity audit

^[30] York City Council 2010 CITY OF YORK BIODIVERSITY AUDIT
<http://democracy.york.gov.uk/documents/s46232/Bio%20Audit%20Review%202010%20with%20appendices%203%20-%20online%20only.pdf>

Figure 3.8 Designated Nature Conservation Sites



York also has a total woodland cover of 998 hectares, which is 3.7% of the total land area and approximately 5.5 hectares per 1,000 population. This is lower than the regional coverage (Yorkshire and the Humber) of 5.8% of the total land area and 18.2 hectares per 1,000 population. Treemendous York is a new initiative being promoted by the community and City of York Council with a target of planting 50,000 new trees. Almost a thousand trees have been planted in York since Treemendous was launched in October 2011.

Open Space

Open space in York includes approximately 480 hectares of parks and open spaces. Existing open space, however, is not distributed in a uniform manner across the City and deficiencies have been identified for different categories as a result.

Five of York's park and gardens have achieved Green Flag Award Status based upon the quality and provision of facilities within the parks. These parks are Rawcliffe Country Park, Glen Gardens, Rowntree Park, Westbank Park and University of York Campus. Two places in York have also received a Green Flag Community Award for their Gardens: The Nose, St Clement's Church who grows edible plants for local people deprived of growing space, and St Nicholas Field, which is a former rubbish tip transformed into an urban nature park and designated local nature reserve.

York has had a growing focus on the importance of play for a number of years and new funding also provides a number of play areas throughout the City. Some of these have recently benefitted from the Government's Playbuilder Project.

Key Issues from the Baseline

- Whilst open space in York includes approximately 480 hectares of parks and open spaces, it is not distributed in a uniform manner across the City and therefore some areas are deficient in certain types of open space;
- The quality of large parks and gardens in York is good with five designated as Green Flag Award Status;
- York has an abundance of important sites for nature conservation at international, national, regional and local levels;
- The City's nature conservation sites support a diverse range of flora and fauna;
- Initiatives are ongoing to support nature conservation/open spaces around the City.

Likely Future Scenario Based upon the Baseline - "Policy off" Scenario

York has a vast variety of open space, sport and recreation spaces within the City with the majority of the City having access to different types of space. The maintenance of these assets are largely outside the control of planning. However, there are identified deficiencies in some types of open space and without policy intervention this may remain the case in the future with incremental improvements to open space around the City on an adhoc basis. The positive contribution planning policy could make would be to support and protect open space and improve deficiency through delivery within new developments and designations.

York has a number of international, national, regional and locally recognised nature conservation sites. The designation and quality of these are largely out of the remit of planning and there are ongoing schemes to ensure their quality and maintenance. There are also ongoing initiatives to support nature conservation and biodiversity, including stewarding schemes and the Treemendous project. It is reasonable to assume that in these cases the current situation would remain as the status quo. Biodiversity and nature conservation are vulnerable to changes, however, and lack of policy to support their integrity through sensitive location of development may have a

negative effect on overall biodiversity and natural assets. Through planning policy, opportunities may also be realised to enhance designated sites and biodiversity more broadly through, for example, habitat creation and management.

3.3.11 Landscape and Heritage

Landscape

The setting of York is characterised by open approaches leading towards the City. Long views are achieved across the relatively flat landscape with only occasional woods to interrupt extensive views. The series of green wedges in the City enable long views to be experienced from the outskirts of the City towards important landmarks such as York Minster. The ring-road around York also allows an appreciation for the size and scale of the City as the flat approaches make possible long-distance views across the landscape towards York Minster. York Minster is a dominant feature within the City and views of this building are widely held to be very important in defining the special character of York and its setting. The open approaches enable the City to be experienced within its wider setting establishing a close relationship between the urban area, green wedges, surrounding countryside and the villages.

The landscape of York is broadly characterised as relatively flat and low lying agricultural land dominated by the wide flood plain of the River Ouse, rising slightly to the east and surrounded by a relatively evenly spaced pattern of villages. Specifically, the historic central city of York is recognised as important in the Natural England's National Character Assessment (NCA) as follows:

- The City of York sits at the centre of the NCA with roads radiating out from it as spokes on a wheel. There has been a history of settlement here, which brings in a high number of tourists to the area.
- York Minster forms a prominent landmark and focal point for the Vale and visitors to the area.
- There is development pressure around the city that could lead to development sprawl that takes away from the enclosed dominance of the town centre.

Heritage

York's wealth of historic assets include:

- York Minster, England's largest (surviving) medieval church and the largest Gothic Cathedral in Northern Europe;
- 2,228 listed buildings of which 242 (15%) are Grade 1 and 2*;
- 22 scheduled monuments in the City including the City Walls, York Castle, Clifford's Tower and St Mary's Abbey;

- Registered historic parks and gardens, which include the Museum Gardens and Rowntree Park;
- 35 designated conservation areas, each of which is covered by a Conservation Area Appraisal and have extra controls applied to them so that the character of the area can be preserved and enhanced.

The City of York is one of only five historic centres in England that has been designated as an Area of Archaeological Importance. It is widely acknowledged that many of the deposits are as yet undiscovered and will only become apparent in the urban area through redevelopment of sites and in rural areas through agricultural practice and any new development.

The Central Historic Core Conservation Area Appraisal (2012) was undertaken to enable an understanding of the character of the historic core and how to manage it in the future. This identified 24 character areas and their special quality's as well as their vulnerabilities and opportunities for enhancing its appearance and character.

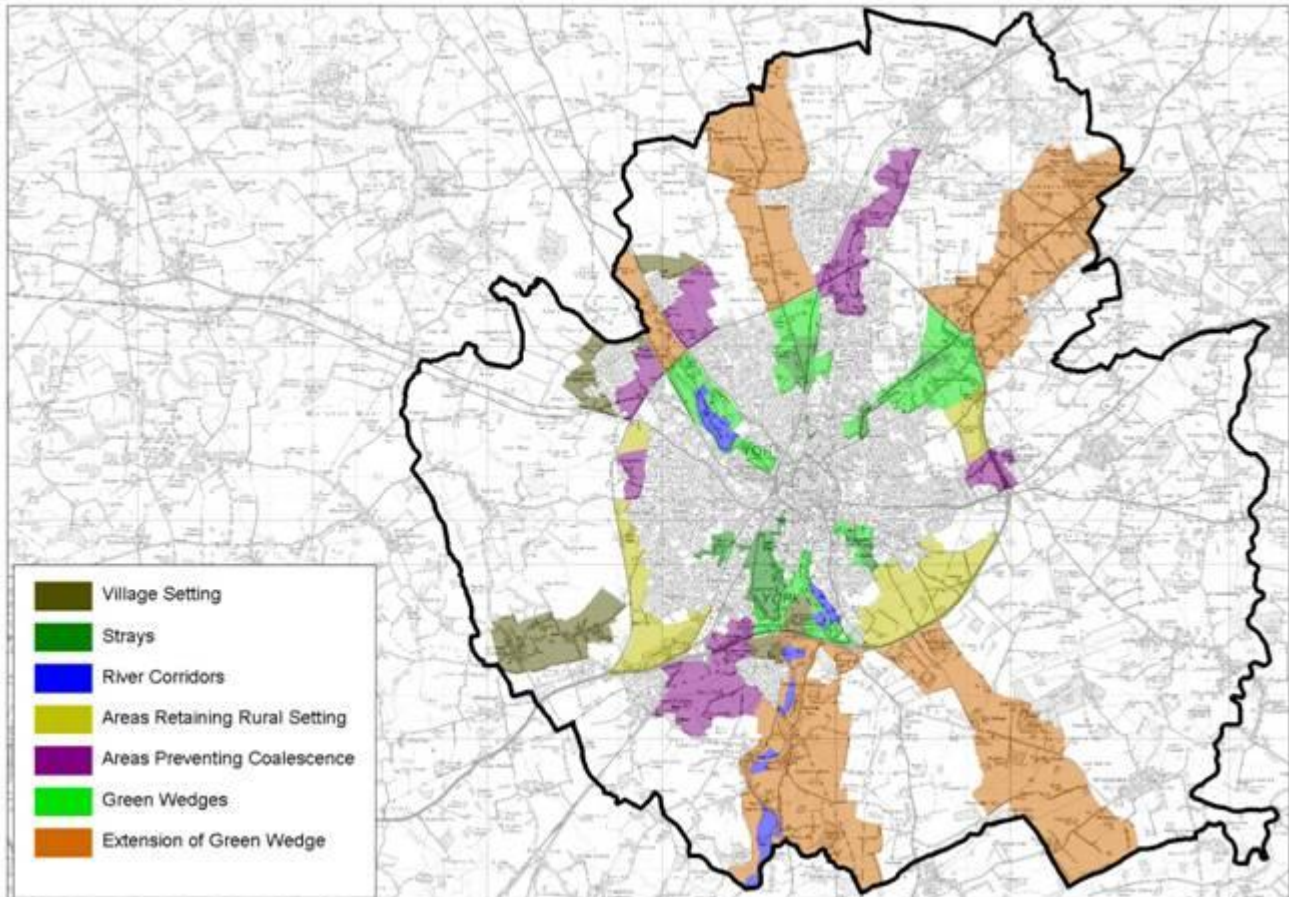
A review of the Green Belt (2003, updated 2011^[31]) identified areas of York important to the historic character and setting of the City.

Issues from the Baseline

- York's landscape is a primary feature of York's historic character and setting (see **Figure 3.9**);
- There are specific elements of the landscape that need to be preserved in order to appreciate the whole of York's context;
- Views from and to the landscape and built environment features are an important feature of York's character;
- Historic character and setting is an integral part of the city's past and future;
- The attractive and unique historic environment contributes to/influences the economy, social and environmental functioning of the city of York;
- Appreciating the value of heritage assets is key to preservation and enhancement as well understanding any future impacts;
- Consideration needs to be given to the key views and assets which are identified to have a positive experience for the City.

^[31] source

Figure 3.8 Historic Character and Setting



Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

York’s historic environment is a key defining feature of the City. Its character derives not only from its designated assets, such as listed buildings, scheduled monuments and conservation areas, but also its non-designated assets, including its below ground archaeological deposits. York has also been designated as an area of archaeological importance. Whilst it is reasonable to assume that the majority of the designated heritage assets will remain since works to them invariably require consent, elements which contribute to their significance could be harmed through inappropriate development in their vicinity.

The Heritage Topic Paper (2014) identifies those key attributes which contribute to the special historic character and setting of York. Whilst the formally designated sites may afford some statutory protection through the planning system, other non-designated elements which contribute to the character of the historic city could be harmed without a clear policy framework. Pressures from development in terms of density or building height in

various locations could compromise unique features in York. Whilst design can be subjective, without the necessary policy or in a ‘policy-off’ scenario, there could be significant detrimental impact on the overall historic built environment and its setting.

3.3.12 Geology and Soils

Soils

The Vale of York has good quality agricultural soils with just over half of the area being classified as grade 2 and almost a quarter is classified as grade 3 agricultural land. Most of the highest quality agricultural land (grade 2) is found in the south west and scattered across the northern half of the NCA. The slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils (37% of the NCA) may suffer compaction and/ or capping as they are easily damaged when wet. In turn, this may lead to increasingly poor water infiltration and diffuse pollution as a result of surface water run-off.

Contamination

The Council published its first Contaminated Land Strategy in July 2001, to outline its strategic approach for carrying out its statutory inspection duties and for securing remedial action. The Council has currently identified 3,669 potentially contaminated sites within the City. All of the potentially contaminated sites have a past industrial use or have been used for waste disposal activities.

Issues from the Baseline

- There are contaminated land sites across the City which would require remediation should it be taken forward for development;
- There are crossovers between land contamination with natural resources and people’s health and well-being;
- Agricultural land in York is predominantly of good quality and therefore valuable for farming.

Likely Future Scenario Based upon the Baseline - “Policy off” Scenario

Within the City there exists a number of locations which are contaminated either due to an historic or current use. Legislation is in place to ensure that appropriate mitigation ensues on parcels of land which are to be developed or pose risk to human health. It is reasonable to assume therefore that this national legislation would govern the need for York to contain/mitigate land in the future.

The majority of agricultural land in York is of good quality. This land is therefore a valuable resource for farming although the quality of farmland is vulnerable to flood events and changes to nutrient levels. Planning policy

influencing flood risk and location of development may have an indirect effect on this. A no-policy scenario could lead to impacts on land either through loss to development or changing patterns of flooding which leaves silt/nutrients on the land.

3.3.13 Community Safety

Total crime in York dropped by 10% (1,623 crimes) in 2011-12 compared to 2010-11. The first five months of data available for 2013/14 suggest that crime continues to reduce and at present is predicted to be between 5 and 10%.

The results of the Big York Survey carried out by City of York Council and the Crime Survey carried out by the University of York revealed that three-quarters of respondents felt that York is a safe place overall with over 90% of respondents saying that they were satisfied with their local area as a place to live in. Most also had very positive views about the levels of crime and anti-social behaviour in their areas with the issue of rubbish or litter generally being the biggest cause for concern.

Issues from the Baseline

- People generally think York is a safe place to live;
- Crime rates are decreasing;
- Support for the future should be aimed at helping to meet the objectives and identified priorities set out in the Community Safety Plan.

Likely Future Scenario Based upon the Baseline - "Policy off" Scenario

Delivering key safety protection measures are primarily out of the remit of the Local Plan. The Community Safety Plan sets out a number of objectives to deliver a safer City and other organisations, such as the Safer York Partnership, would ensure that initiatives and schemes were in place for the safety of residents and businesses. It would be reasonable to assume that the current crime trends would continue.

3.4 Key Sustainability Issues

From the baseline analysis and review of plans and programmes, a number of key sustainability issues have been identified. These are presented in **Table 3.3**, structured according to the SEA Directive Annex I (f) topics.

Table 3.3 Summary of Key Sustainability Issues

SEA Topic	SA Theme	Key Sustainability Issues
Population	Population and Households, Community Safety	<p>Housing</p> <ul style="list-style-type: none"> York's population and household numbers are projected to increase; York has a high need for housing including affordable housing; There is a need to plan for a mix and type of accommodation to suit all household types. <p>Deprivation</p> <ul style="list-style-type: none"> York has become less deprived but still has pockets of high deprivation which need to be addressed; Demand for affordable homes is high; York has areas which feature within the top 20% most deprived in the country in terms of barriers to housing, although the number has decreased between 2007 and 2010; A major barrier to housing is the disparity between the cost of housing and how much people earn as well as access to funding such as mortgages; The provision of other types of homes for the elderly, including nursing homes, residential care homes and warden assisted living as well as support services will need to be developed; There is a recognised need for Gypsy and Traveller and Showpeople sites. <p>Community Safety</p> <ul style="list-style-type: none"> People generally think York is a safe place to live; Crime rates are decreasing; Support for the future should be aimed at helping to meet the objectives and identified priorities set out in the Community Safety Plan. <p>Economy</p> <ul style="list-style-type: none"> A key challenge is to achieve economic growth in a sustainable manner that protects the environment whilst allowing social and economic progress that recognises the needs of all people; The unemployment rate gap between York and the UK has increased through 2011/12 showing York's unemployment levels are lower than the national average; York seems fairly resilient to the economic downturn with a highly skilled labour force and the highest number of businesses in 2012 since 1998; The relative dependence on public sector employment is decreasing with the increase in private business; The proportion of people with NVQ4+ is increasing; The number of City Centre vacant shops is decreasing; Footfall has been negatively affected by external factors effecting spend in the City; The authority has a duty to provide and support education for all for the development of skills and learning; The results attained at primary and secondary level are good.
Human Health	Health, Air Quality, Flood Risk	<ul style="list-style-type: none"> The general health of citizens in York is good; The main priorities to address are obesity, particularly in children, alcohol and physical.
Biodiversity, Fauna, Flora	Green Infrastructure and Biodiversity	<ul style="list-style-type: none"> Whilst open space in York includes approximately 480 hectares of parks and open spaces, it is not distributed in a uniform manner across the City and therefore some areas are deficient in certain types of open space; The quality of large parks and gardens in York is good with five designated as Green Flag Award Status;

SEA Topic	SA Theme	Key Sustainability Issues
		<ul style="list-style-type: none"> York has an abundance of important site for nature conservation at international, national, regional and local levels; The City's nature conservation sites support a diverse range of flora and fauna; Initiatives are ongoing to support nature conservation/open space around the City.
Soil	Geology and Soils	<ul style="list-style-type: none"> There are contaminated land sites across the City which would require remediation should it be taken forward for development; There are crossovers between land contamination with natural resources and people's health and well-being; Agricultural land in York is predominantly of good quality and therefore valuable for farming.
Water	Water and Flood Risk, Resource consumption, Energy and Waste	<ul style="list-style-type: none"> York has a history of flooding which needs to be taken into consideration in the planning for the future of the City; Flooding is still likely and will affect people and businesses in York; There is a need to minimise future flood risk arising from the impacts of climate change; Water quality is generally good with the main reasons for poor quality linked with agricultural farming practices.
Air	Air quality, Climate, Transport	<ul style="list-style-type: none"> York's air quality continues to decline in the City Centre; A combination of measures is needed in order to tackle decreasing air quality including a modal shift in transport and moving to low emission technologies with supporting infrastructure; York's ambition is to become the first low emission city.
Climatic Factors	Climate, Air Quality, Flood Risk, Resources, Energy and Waste, Transport	<p>Climate</p> <ul style="list-style-type: none"> Climate change will have an impact in York at a variety of levels; Targeted campaigns can work including those aimed at design and sustainability as well as lifestyle changes. <p>Transport</p> <ul style="list-style-type: none"> Traffic levels in York have remained largely unchanged since 1998, despite continued development over this period; York experiences a net daily in-commute; The number of people cycling has increased since the introduction of the Cycling City York Programme. High frequency bus services match well to the areas in York with the highest number of households without a car; Vehicle ownership levels are significantly higher in rural areas of the York area; York is well connected by rail to many other areas of the country, but services to Harrogate are of a low frequency and rail links to the south east of the city including Hull are relatively poor; Killed and seriously injured road casualties have reduced by at least 45% (from the 1994/98 average); In the past two years, City of York Council has made successful bids to Government for funding programmes to improve public transport and encourage travel behaviour change to reduce dependency on the private car for travel.
Material Assets	Resources, Energy and Waste	<ul style="list-style-type: none"> York has reduced its overall consumption of energy resources over the past few years and this trend is likely to continue; A key consumer of resources is transport; External factors such as the weather are likely to continue to impact on consumption; The Council is committed to resource and carbon reduction through energy efficiency; Water resources are not likely to have a significant effect on York as the household consumption has been built into Yorkshire water's supply/demand models. Water efficiency however is still

SEA Topic	SA Theme	Key Sustainability Issues
		<p>required;</p> <ul style="list-style-type: none"> The amount of waste produced in York is reducing whilst the levels of recycling and composting has increased in line with a decrease in landfill.
Cultural Heritage including architectural and archaeological	Heritage, Landscape	<ul style="list-style-type: none"> Historic character and setting are an integral part of the City's past and future; The attractive and unique historic environment contributes to/influences the economy, social and environmental functioning of the City of York; Appreciating the value of heritage assets is key to preservation and enhancement as well as understanding any future impacts; Consideration needs to be given to the key views and assets which are identified to have a positive experience for the City.
Landscape	Heritage, Landscape	<ul style="list-style-type: none"> York's Landscape is a primary feature of York's historic character and setting; There are specific elements of the landscape that need to be preserved in order to appreciate the whole of York's context; Views from and to the landscape and built environment features are an important feature of York's character.

DRAFT

4. SA Approach

4.1 Introduction

This section outlines the methodology used to appraise the draft Local Plan and sets out the objectives against which the plan vision, outcomes, key development principles, spatial strategy and thematic policies have been appraised. The SA objectives used for this appraisal are consistent with those developed to appraise the Local Plan Preferred Options and were consulted upon in the 2013 Scoping Report. They reflect the review of plans and programmes, analysis of baseline conditions and the subsequent identification of key sustainability issues (see **Section 3** and **Table 3.3** in particular).

4.2 SA Framework

Establishing appropriate objectives and guide questions is central to appraising the sustainability effects of the draft Local Plan. Broadly, SA objectives present the preferred sustainability outcome which usually involves minimising detrimental effects and enhancing positive ones. The SA process considers the contribution of the plan, vision, outcomes and individual policies and allocations towards each of the appraisal objectives.

Table 4.1 presents the SA objectives and the key questions/guidance relating to each of the objectives used in the appraisal of the draft Local Plan. They reflect the analysis of the baseline, the review of plans and programmes and the identification of the resulting key sustainability issues. The SEA Directive topic to which each of the SA objectives relates is included in the third column.

Table 4.1 The SA Framework

SA Objective	Guide questions. Will the policy/proposal ...	SEA Dir Topic
1. To meet the diverse housing needs of the population in a sustainable way.	<ul style="list-style-type: none"> • Deliver homes to meet the needs of the population in terms of quantity, quality • Promote improvements to the existing and future housing stock • Locate sites in areas of known housing need • Deliver community facilities for the needs of the population • Deliver pitches required for Gypsies and Travellers and Showpeople 	Population
2. Improve the health and wellbeing of York's population	<ul style="list-style-type: none"> • Avoid locating development where environmental circumstances could negatively impact on people's health • Improve access to open space / multi-functional open space • Promotes a healthier lifestyle through access to leisure opportunities (walking /cycling) • Improves access to healthcare 	Population, Human Health

SA Objective	Guide questions. Will the policy/proposal ...	SEA Dir Topic
	<ul style="list-style-type: none"> Provides or promotes safety and security for residents Ensure that land contamination/pollution does not pose unacceptable risks to health 	
3. Improve education, skills development and training for an effective workforce	<ul style="list-style-type: none"> Provide good education and training opportunities for all Support existing higher and further educational establishments for continued success Provide good quality employment opportunities available to all 	Population
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	<ul style="list-style-type: none"> Help deliver conditions for business success and investment Deliver a flexible and relevant workforce for the future Deliver and promote stable economic growth Enhance the city centre and its opportunities for business and leisure Provide the appropriate infrastructure for economic growth Support existing employment drivers Promote a low carbon economy 	Population
5. Help deliver equality and access to all	<ul style="list-style-type: none"> Address existing imbalances of equality, deprivation and exclusion across the city Provide accessible services and facilities for the local population Provide affordable housing to meet demand Help reduce homelessness Promote the safety and security for people and/or property 	Population, Human Health
6. Reduce the need to travel and deliver a sustainable integrated transport network	<ul style="list-style-type: none"> Deliver development where it is accessible by public transport, walking and cycling to minimise the use of the car Deliver transport infrastructure which supports sustainable travel options Promote sustainable forms of travel Improve congestion 	Air, Climatic Factors
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	<ul style="list-style-type: none"> Reduce or mitigate greenhouse gas emissions from all sources Plan or implement adaptation measures for the likely effects of climate change Provide and develop energy from renewable, low and zero carbon technologies Promote sustainable design and building materials that manage the future risks and consequences of climate change Adhere to the principles of the energy hierarchy 	Climatic Factors
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	<ul style="list-style-type: none"> Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs Protect and enhance locally important nature conservation sites (SINCs) Create new areas or site of bio-diversity / geodiversity value Improve connectivity of green infrastructure and the natural environment Provide opportunities for people to access the natural environment 	Biodiversity, Flora & Fauna, Human Health
9. Use land resources efficiently and safeguard their quality	<ul style="list-style-type: none"> Re-use previously developed land Prevent pollution contaminating the land and remediate any existing contamination 	Soil, Material Assets

SA Objective	Guide questions. Will the policy/proposal ...	SEA Dir Topic
	<ul style="list-style-type: none"> Safeguard soil quality, including the best and most versatile agricultural land Protect or enhance allotments Safeguard mineral resources and encourage their efficient use 	
10. Improve water efficiency and quality	<ul style="list-style-type: none"> Conserve water resources and quality; Improve the quality of rivers and groundwaters 	Water
11. Reduce waste generation and increase level of reuse and recycling	<ul style="list-style-type: none"> Promote reduction, re-use, recovery and recycling of waste Promote and increase resource efficiency 	Material Assets
12. Improve air quality	<ul style="list-style-type: none"> Reduce all emissions to air from current activities Minimise and mitigate emissions to air from new development (including reducing transport emissions through low emission technologies and fuels) Support the development of city wide low emission infrastructure; Improve air quality in AQMAs and prevent new designations; Avoid locating development where it could negatively impact on air quality Avoid locating development in areas of existing poor air quality where it could result in negative impacts on the health of future occupants/users Promote sustainable and integrated transport network to minimise the use of the car 	Air, Human Health
13. Minimise flood risk and reduce the impact of flooding to people and property in York	<ul style="list-style-type: none"> Reduce risk of flooding Ensure development location and design does not negatively impact on flood risk Deliver or incorporate through design sustainable urban drainage systems (SUDs) 	Climatic Factors, Water
14. Conserve or enhance York's historic environment, cultural heritage, character and setting	<ul style="list-style-type: none"> Preserve or enhance the special character and setting of the historic city Promote or enhance local culture Preserve or enhance designated and non-designated heritage assets and their setting Preserve or enhance those elements which contribute to the 6 Principle Characteristics of the City as identified in the Heritage Topic Paper 	Cultural Heritage, Landscape
15. Protect and enhance York's natural and built landscape	<ul style="list-style-type: none"> Preserve or enhance the landscape including areas of landscape value Protect or enhance geologically important sites; Promote high quality design in context with its urban and rural landscape and in line with the "landscape and Setting" within the Heritage Topic Paper 	Cultural Heritage, Landscape

Table 4.2 shows the extent to which the SA objectives encompass the range of issues identified in the SEA Directive.

Table 4.2 The SA Objectives Compared Against the SEA Directive Topics

SEA Directive Topic	SA Objective
Biodiversity	8
Population *	1, 2, 3, 4, 5
Human Health	2, 12
Fauna	8
Flora	8
Soil	9
Water	10, 13
Air	6, 12
Climatic Factors	6, 7, 13
Material Assets *	9, 11
Cultural Heritage including architectural and archaeological	14, 15
Landscape	14, 15

* These terms are not clearly defined in the SEA Directive.

4.3 Appraising the Draft Local Plan Vision and Outcomes

The draft Local Plan vision and plan outcomes are reproduced in **Section 1.2** of this report. It is important that the vision and outcomes are aligned with the SA objectives (see ODPM guidance⁷ Task B1). This has been tested by assessing the relationship between the SA objectives and the draft Local Plan vision and outcomes.

The vision and the four plan outcomes have been assessed for their compatibility against each of the 15 SA objectives (presented in **Table 4.1**). The following scoring system has been used to determine their compatibility:

+	Compatible	?	Uncertain
0	Neutral	-	Incompatible

⁷ ODPM (November 2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities*.

The findings of the compatibility assessment of the vision and plan outcomes and SA objectives are shown in **Table 5.1**. The findings are summarised in **Section 5.2**.

4.4 Appraising the Draft Key Development Principles

As detailed in **Section 1.2**, alongside the vision and plan outcomes Chapter 2 of the draft Local Plan also sets out the key development principles for York through four policies. The appraisal of these policies has been undertaken against each of the SA objectives using an appraisal matrix. The following information was recorded in the matrix in order to present the findings of the SA:

- The SA objectives and criteria;
- A score indicating the nature of the effect for each individual policy and for the cumulative effect of all policies;
- A commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
- Recommendations as to how the proposed policies may be improved against the SA objectives, including any mitigation or enhancements measures.

The qualitative scoring system used to assess the effects of the policies is shown in **Table 4.3** below.

Table 4.3 Scoring System Used in the SA of Key Development Principles Policies

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect on the SA objective.
+	The policy is likely to have a positive effect on the SA objective.
0	No significant effect / no clear link between the policy and the SA objective.
?	Uncertain or insufficient information on which to determine effect on the SA objective.
-	The policy is likely to have a negative effect on the SA objective.
--	The policy is likely to have a significant negative effect on the SA objective.

A summary of the results of the appraisal of draft Local Plan key development principles is presented in **Section 5.3** of this report. The appraisal matrices are presented at **Appendix E**.

4.5 Appraising the Draft Spatial Strategy

The appraisal of the spatial strategy has been undertaken by appraising those policies concerning the quantum and location of development in Chapter 3 (Spatial Strategy) of the draft Local Plan alongside the strategic sites and smaller (local) allocations.

The approach to the appraisal of each component of the spatial strategy is summarised below.

4.5.1 Spatial Strategy Policies

The spatial strategy policies have been appraised using the same approach as that adopted to appraise those policies that set out the key development principles (see **Section 4.4** above). A score has been awarded for both each constituent policy and for the cumulative effects of all the policies contained in the chapter.

A summary of the results of the appraisal is presented in **Section 5.4** of this report. The appraisal matrices are presented at **Appendix F**.

4.5.2 Strategic Sites and Local Allocations

As set out in **Section 1.2**, the majority of growth over the plan period is to be delivered at strategic sites including four 'Key Areas of Change'. The process of the identification of strategic sites as part of the preparation of the draft Local Plan is described in **Section 2.2.3** of this report.

Additionally, a total of 275 strategic and smaller scale (local) site allocations have been considered as part of this SA. This includes an addition 20 housing sites, 10 employment, 3 Gypsy and Traveller sites and 2 mixed use site which have been identified since the preferred options stage.

Consistent with the approach adopted to the appraisal of sites as part of the SA of the Local Plan Preferred Options, all sites were assessed against the 15 SA objectives using tailored assessment criteria, as shown in **Table 4.4**. The outcome of the assessment is presented at **Appendix H**.

Proposed/potential strategic site allocations have also been subject to more detailed assessment against the SA objectives. This reflects their potential importance to the delivery of the spatial strategy, their capacity to generate significant effects and the need to consider in more detail opportunities for the delivery of on-site services and facilities commensurate to the scale of development. Similar to the appraisal of spatial strategy policies, an appraisal matrix was utilised and the following information recorded:

- The SA objectives and criteria;
- A score indicating the nature of the effect for each site by SA objective;

- A commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
- Recommendations, including any mitigation or enhancements measures.

The appraisal matrix for each strategic site is contained at **Appendix I**. A summary of the appraisal of the proposed strategic site allocations is presented in **Section 5.5**.

Table 4.4 Site Assessment Criteria

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring	
		Per indicator	Total	Points scored	SA Symbol
1: To meet the diverse housing needs of the population in a sustainable way.	No. of dwellings proposed/estimated	n/a	n/a	100+ 1-99 0	++ + 0
2: Improve the health and well-being of York's population	Access to: <ul style="list-style-type: none"> • doctors • open space 	5 5	10	6-10 3-5 1-2 0	++ + - --
3: Improve education, skills development and training for an effective workforce	(Housing) Access to: <ul style="list-style-type: none"> • nursery provision • primary schools • secondary schools • higher education facilities (Employment) Access to: <ul style="list-style-type: none"> • nursery provision 	5 5 5 5 5	20 5	11 -20 5-10 1-4 0 4-5 1-2 0	++ + - -- ++ + -

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring	
		Indicator	Per indicator	Total	Points scored
4: Create jobs and deliver growth of a sustainable and inclusive economy	No. of jobs potentially created	n/a	n/a	100+ 1-99 0	++ + 0
5: Help deliver equality and access to all	Access to:			Employment score:	
6: Reduce the need to travel and deliver a sustainable integrated transport network	<ul style="list-style-type: none"> • non-frequent bus routes • frequent bus routes • park and ride bus stops • railway station by walking • railway station by cycling • adopted highways • Cycle routes 	3 5 5 5 5 5	33 ⁸	18-33 9- 17 1-8 0	++ + --
	Additional access for Housing sites: • Supermarket	5		Housing score:	
			Housing: 38	21-38 11-20 1-10 0	++ + --
7: To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	Potential to incorporate/connect to District Heating and Combined Heat and Power Networks	n/a	n/a	10+ dwellings/ 1,000sqm floorspace <10 dwellings/ 1,000sqm	+ 0

⁸ The total scoring applied to Objective 6 was reduced from a maximum score of 38 to reflect to deletion of neighbourhood centres as an indicator. Public rights of way were also removed as an indicator from this objective.

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring		
		Indicator	Per indicator	Total	Points scored	SA Symbol
					floorspace	
8: Conserve and enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for high quality and connected natural environment ⁹	<ul style="list-style-type: none"> Statutory nature conservation designations; Regional Green Infrastructure Corridor; Site of Interest for Nature Conservation (SINC); Area of Local Nature Conservation (LNC) Interest; Ancient Woodland. 	n/a	n/a	Includes/is adjacent to a non-statutory designated site.	-	
				500m from a ¹⁰ statutory site	-	
				250m from a statutory designated site	-	
				No designations affecting site	0	
9: Use land resources efficiently and safeguard their quality	<ul style="list-style-type: none"> Brownfield / Greenfield/ Mixed Agricultural Land Classification 	n/a	n/a	Brownfield	++	
				Mixed BF/GF	+ / -	
				GF Not Grade 1/2/3	-	
				GF and Grade1/ 2/3	--	

⁹ In reference to these criteria, ‘adjacent’ refers to a 10m buffer from a non-statutory site.

¹⁰ The scoring against Objective 8 was amended to reflect potential impacts on Statutory Nature Conservation Sites. Indicators including district green infrastructure and tree preservation orders were removed.

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring	
		Per indicator	Total	Points scored	SA Symbol
10: Improve water efficiency and quality	Proximity to waterbodies	n/a	n/a	Within 10m 10 – 30m >30m	-- - 0
	Environment Agency Groundwater Source Protection Zones (SPZ)	n/a	n/a	Zone 1 Zone 2 Zones 3 & 4 Outside SPZ	-- - 0
11: Reduce waste generation and increase level of reuse and recycling	Not applicable at location level assessment				
12: Improve air quality	Air quality management area (AQMA)	n/a	n/a	Within 50m 250m 500m	-- - 0
13: Minimise flood risk and reduce the impact of flooding to people and property in York	Environment Agency Flood Zones	n/a	n/a	Zone 3a Flood Zone 2 Flood Zone 1	-- - 0
14: Conserve and enhance York's historic environment, cultural heritage, character and setting	Heritage Impact Appraisal ¹¹	n/a	n/a	Significant Positive Benefit Positive	++ +

¹¹ The scoring against Objective 14 has been informed by the evidence contained within the Heritage Impact Appraisal (HIA) and discussions with CYC Officers taking into account heritage and landscape designations.

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring	
		Per indicator	Total	Points scored	SA Symbol
				Benefit Minor Harm Serious Harm Neutral	- -- 0
15: Protect and enhance York's natural and built landscape	Heritage Impact Appraisal ¹²	n/a	n/a	Significant Positive Benefit Positive Benefit Minor Harm Serious Harm Neutral	++ + - -- 0

4.6 Appraising the Draft Thematic Policies

The appraisal of thematic policies contained in each of the remaining 12 draft Local Plan policy chapters using the same approach as that adopted to appraise the key development principles and spatial strategy policies. A score has been awarded for both each constituent policy and for the cumulative effect of all policies on a chapter-by-chapter basis.

A summary of the results of the appraisal of the draft Local Plan policies is presented in **Section 5.6** of this report. The appraisal matrices are presented at **Appendix J**.

¹² The scoring against Objective 15 has been informed by the findings of the HIA in respect of Principle Characteristic 6: Landscape and Setting and discussions with CYC Officers taking into account landscape designations.

4.7 Cumulative, Synergistic and Secondary Effects

The policies of the draft Local Plan do not sit in isolation from each other. The policies will work together to achieve the objectives of the Plan. For this reason, it is important to understand what the combined sustainability effects of the policies will be.

As noted above, the appraisal of the key development principles, spatial strategy and thematic policies has been undertaken by draft Local Plan chapter in order to determine the cumulative effects of each policy area. Throughout the policy appraisal matrices, reference is made to where cumulative effects could occur between the policy themes. In addition to the inclusion of cross reference between the policy themes, a cumulative effect assessment has been undertaken in order to clearly identify areas where policies work together. The cumulative assessment matrix is presented in **Table 5.4** and summarised in **Section 5.7**. Additional commentary is also provided where the draft Local Plan may have effects in-combination with other plans and programmes.

4.8 When the SA was Undertaken and by Whom

This SA of the draft Local Plan was undertaken jointly by City of York Council and AMEC in Summer 2014.

4.9 Technical Difficulties, Uncertainties and Assumptions

The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. In this respect, a range of assumptions and uncertainties have been identified in the assessment matrices. Those uncertainties and assumptions that cut across the appraisal are outlined below.

4.9.1 Uncertainties

- The exact composition of future development is uncertain at this stage;
- The exact characteristics of sites (in terms of, for example, the presence of buried archaeological remains or protected species) is uncertain and will be subject to further, detailed analysis at the project stage;
- There could be opportunities to improve water efficiency as part of new developments, for example with the development of SUDS. However, any such improvements could only be determined at the detailed planning application stage;
- There may be opportunities for enhancements to York's historic environment as part of new development. However, this could only be fully determined at the detailed planning application stage;

- There may be opportunities for enhancements to York’s natural and built landscape as part of new development. However, this could only be fully determined at the detailed planning application stage.

4.9.2 Assumptions

- The overarching assumptions and analysis for growth are predicated on modelling and interpretation of different future economic scenarios. However, the future economic climate is uncertain and depending on how this ensues, it may influence the deliverability and viability of sites;
- It is assumed that current energy mix will continue (and associated carbon emissions will be largely similarly to current), although it is noted that against carbon trajectories provided by the Department of Energy and Climate Change, this may lead to an overestimate of carbon emissions;
- It is assumed that there will be no new technological leaps that will substantially alter current patterns of movement, or activities or significantly reduce environmental effects;
- It is assumed that there will be consistent policy implementation;
- It is assumed that development will be located in areas at lowest risk of flooding, or that development would need to accord with policies on flood risk in the draft Local Plan in order to mitigate any adverse effects on flooding;
- The score of ‘No significant effect / no clear link between the policy and the SA objective’ does not always mean that there is no impact/effect predicted on the SA objective. In some cases, the score has been adopted where the positive effects and the negative effects counteract each other, or where the effect does not contribute or detract from the achievement of the objective. For some objectives, such as Biodiversity, protected species and habitats issues may emerge at the project stage as further research is completed on sites;
- Whilst the assessment of cumulative effects of the implementation of the draft Local Plan and other plans and programmes has been based on the most up to date information available at the time of writing, in many cases there is a lack of detailed information to make robust conclusions.

4.10 Findings of the Habitats Regulations Assessment

Regulation 102 of the *Conservation of Habitats and Species Regulations 2010* (as amended) (the ‘Habitats Regulations’) states that if a land-use plan is “(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site” then the plan-making authority must “...make an appropriate assessment of the implications for the site in view of that site’s conservation objectives” before the plan is given effect. The process by which Regulation 102 is met is known as Habitats Regulations Assessment (HRA).

As with Strategic Environmental Assessment (SEA) it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside the plan development, with the emerging policies or options

continually assessed for their possible effects on European sites and modified or abandoned (as necessary) to ensure that the subsequently adopted plan is not likely to result in significant effects on any European sites, either alone or 'in combination' with other plans.

CYC's Local Plan has drawn on the abandoned Core Strategy evidence base, which included a draft HRA. The draft Local Plan and Preferred Options were supported by a preliminary HRA produced by CYC^[1] in 2013 (the 'Preferred Options HRA'), which concluded that emerging Local Plan would not have any significant adverse effects on any European sites as a result of its adoption and implementation, assuming that the strategy, policies and allocations of the Preferred Options stage were adopted and that mitigation and avoidance measures recommended by the HRA process were employed in the final plan. Consultation with NE indicated that further information on some aspects of the assessment may be necessary to support a conclusion of 'no adverse effects', particularly in relation to indirect effects on the Lower Derwent Valley SPA associated with development and increased disturbance of the Heslington Tillmire SSSI.

The assessment concluded that the Local Plan will have no significant effects (alone or in combination) on Kirk Deighton SAC, Skipworth Common SAC, the Humber Estuary SAC, the Humber Estuary SPA or the Humber Estuary Ramsar due to either an absence of impact pathways; policy controls within the plan that can be relied on to ensure significant effects are avoided; or external controls (such as the water resources planning process) that account for the growth aspects of the plan and with which the plan is consistent.

Potential significant effects as a result of increased recreational pressure were identified for Strensall Common SAC and the Lower Derwent Valley SAC, Lower Derwent Valley SPA and Lower Derwent Valley Ramsar.

Strensall Common SAC has three strategic allocations and several smaller allocations fully or partly within 5km of the site boundary, potentially providing 7458 homes over the lifetime of the plan and beyond; most of these homes will be within the distance typically travelled by car for 'casual' recreation (such as dog walking) based on studies at other sites. However, only three small allocations will be within 2km. Several factors are likely to limit the exposure of the interest features to additional recreational pressure, notably the access arrangements and controls (managed by the MOD and the Yorkshire Wildlife Trust). Policies within the Local Plan will ensure the provision of adequate greenspace to prevent development significantly increasing visitor pressure, although policy enhancements are recommended to improve the performance of these. It is therefore concluded that the Local Plan will have no adverse effects on this SAC.

With regard to the Lower Derwent Valley sites, the level of development proposed within 5km is substantially less than for Strensall Common (accounting also for development in neighbouring districts) and is predominantly associated with one strategic site, Whinthorpe. The potential for this allocation to have indirect effects on the SPA features via impacts on the Heslington Tillmire SSSI has been explored through breeding and wintering bird surveys, and regional bird data analysis; this has concluded that there is no evidence of a significant link between

^[1] CYC (2013) *Habitats Regulations Assessment: Local Plan Preferred Options*. Report by the City of York Council, York.

the Heslington Tillmire SSSI and the Lower Derwent Valley SPA. As with Strensall Common, several factors will limit the exposure of the SAC, SPA and Ramsar interest features to additional recreational pressure, notably the existing access and management arrangements; these can be enhanced through planning policy. Furthermore, policies within the Local Plan will ensure the provision of adequate greenspace to prevent the Whinorpe allocation significantly increasing visitor pressure, although policy enhancements are recommended to improve the performance of these. It is therefore concluded that the Local Plan will have no adverse effects on Lower Derwent Valley sites.

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5. Appraisal of Effects of the Draft Local Plan

5.1 Introduction

This section presents the findings of the appraisal of effects of the draft Local Plan against the SA objectives. It assesses the compatibility of the vision and plan outcomes with the SA objectives (**Section 5.2**) before presenting the summary of the appraisal of effects of the key development principles (**Section 5.3**), spatial strategy (**Section 5.4**) and thematic policies (**Section 5.5**). Cumulative, synergistic and secondary effects of the draft Local Plan, both alone and in-combination with other plans and programmes, are considered in **Section 5.6**.

5.2 Vision and Outcomes

As set out in **Section 4.3**, a matrix has been completed to appraise the compatibility of the vision and plan outcomes contained within the draft Local Plan against the SA objectives. **Table 5.1** presents the results of this appraisal.

Table 5.1 Appraisal of the draft Local Plan Vision and Outcomes

SA Objective	Draft Local Plan Vision	Draft Local Plan Outcomes			
		Create Jobs and Grow the Economy	Get York Moving	Build Strong Communities	Protect the Environment
1. To meet the diverse housing needs of the population in a sustainable way.	+	0	0	+	?
2. Improve the health and wellbeing of York's population	+	+	+	+	+
3. Improve education, skills development and training for an effective workforce	+	+	0	+	?
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	+	+	+	+	?

SA Objective	Draft Local Plan Vision	Draft Local Plan Outcomes			
		Create Jobs and Grow the Economy	Get York Moving	Build Strong Communities	Protect the Environment
5. Help deliver equality and access to all	+	+	+	+	0
6. Reduce the need to travel and deliver a sustainable integrated transport network	+	+	+	+	+
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	+/-	-	+	+/-	+
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	+/?	?	0	?	+
9. Use land resources efficiently and safeguard their quality	+/-	-	0	-	+
10. Improve water efficiency and quality	+/-	-	0	-	+
11. Reduce waste generation and increase level of reuse and recycling	+/-	-	0	-	+
12. Improve air quality	+/-	?	+	?	+
13. Minimise flood risk and reduce the impact of flooding to people and property in York	+/?	?	0	?	+
14. Conserve or enhance York's historic environment, cultural heritage, character and setting	+/?	+/?	0	?	+
15. Protect and enhance York's natural and built landscape	+/?	+/?	0	?	+

5.2.1 Vision

The draft Local Plan vision is underpinned by the principles of sustainable development in seeking to “*deliver sustainable patterns and forms of development*” and deliver “*the city’s economic, environmental and social*”

objectives". This will include "ensuring that the city's spaces and archaeology can contribute to the economic and social welfare of the community whilst conserving and enhancing its unique historic and natural environmental assets".

Reflecting the emphasis on the delivery of sustainable development, the appraisal presented in **Table 5.1** has shown that the vision is compatible with the majority of the SA objectives. However, whilst the vision aims to deliver sustainable growth, there is the potential for conflicts particularly between those parts of the vision that support economic growth and social objectives and those that relate to the conservation and enhancement of the City's built and natural environment and this is likely to depend on how the vision is realised through draft Local Plan policies. In this respect, where the relationship between the vision and SA objectives relating to biodiversity, flood risk, cultural heritage and landscape has been assessed as being compatible, a degree of uncertainty has been identified in **Table 5.1**.

The potential for both compatibilities and incompatibilities has been identified in respect of those SA objectives relating to climate change, land use, water, waste and air quality. This reflects the fact that, whilst the vision promotes sustainable development, growth will inevitably lead to an increase in resource use, land take, waste generation and emissions to air.

Overall, the draft Local Plan vision leaves room for uncertainties, as potential for compatibilities and incompatibilities has been identified. Although the vision aims to deliver "sustainable patterns and forms of development", potential conflicts could arise between growth, resource use and environmental factors. The effects are often highly dependent on whether growth is achieved under consideration of economic, social and environmental sustainability.

5.2.2 Outcomes

Broadly, the draft Local Plan outcomes are supportive of the SA objectives and none of the plan have been assessed as being incompatible with all of the SA objectives. Those SA objectives that are particularly well supported by the plan outcomes include SA Objective 2 (Health), SA Objective 4 (Economy), SA Objective 5 (Equality and Accessibility) and SA Objective 6 (Transport). This reflects the emphasis of the outcomes on the promotion of health (including by ensuring that development does not have adverse impacts on health and through the promotion of healthy lifestyles), economic growth and sustainable transport.

Draft Local Plan outcomes relating to economic development, transport and building strong communities were identified as having a strong positive relationship with the socio-economic SA objectives (SA objectives 1, 2, 3, 4, 5 and 6) in particular. The outcome 'Protect the Environment', meanwhile, was considered to be compatible with those SA objectives related to health, transport, resource use, waste, air quality, flood risk, climate change and the conservation and enhancement of the City's built and natural environments (SA Objectives 1 and 6 to 15).

This assessment has identified some areas where possible tensions exist. Where tensions have been identified, this primarily relates to, on the one hand, the aspiration for growth, and on the other, the need to minimise resource use, waste and greenhouse gas emissions. In this respect, the outcomes ‘Create Jobs and Grow the Economy’ and ‘Build Strong Communities’ are likely to lead to increased resource use (including land and water), waste generation and emissions associated with new housing and economic development which may be incompatible with SA objectives relating to climate change, land use, water and waste.

There is also the potential for conflicts between the promotion of housing and economic growth and the conservation and enhancement of the City’s built and natural environment, although this is likely to depend on how the outcomes are realised through Local Plan policies. In this respect, the relationship between the outcomes ‘Create Jobs and Grow the Economy’ and ‘Build Strong Communities’ and the SA objectives relating to biodiversity, air quality, flood risk, cultural heritage and landscape has been assessed as being uncertain. Conversely, the outcome ‘Protect the Environment’ has been assessed as having an uncertain relationship with SA Objective 1 (Housing) and SA Objective 4 (Economy) as the protection of the City’s environmental assets could in theory constrain housing and economic growth (although it is noted that the promotion of the City’s heritage assets and the creation of a high quality public realm are seen as key developments of the City’s economic potential).

Notwithstanding, the assessment has highlighted that any adverse effects may be mitigated, and tensions between the SA objectives and plan outcomes resolved, if development takes place in accordance with all of the draft Local Plan outcomes and as such an incompatibility or uncertainty is not necessarily an insurmountable issue, but one that may need to be considered in the development and implementation of the policies that comprise the Plan.

5.3 Key Development Principles

Chapter 2 of the draft Local Plan includes four policies which detail the key development principles intended to support the delivery of the vision and plan outcomes. The performance of these policies has been tested against the 15 SA objectives. The full findings of the appraisal are presented at **Appendix G**.

The policies that contain the key development principles are anticipated to have a positive effect on all of the SA objectives with those effects being significant in respect of housing, health, equality and accessibility, transport, climate change, biodiversity, flood risk, cultural heritage and landscape. This principally reflects the emphasis of the policies on the delivery of sustainable development. Policy DP1 (York Sub Area), for example, sets out that development will ensure that York fulfils its role within both the Leeds City Region and the York and North Yorkshire Sub Region, ensuring that the City is a key economic driver and a retail, service and transport hub. DP1 also seeks to ensure that its housing needs are met within the local authority area whilst at the same time conserving and enhancing the City’s historic and natural environment. Policy DP2 (Sustainable Development), meanwhile, effectively defines sustainable development in the context of York and Policy DP3 promotes the development of sustainable communities and together they aim to encourage growth that is balanced with social and environmental

considerations. Effects associated the Policy DP4 (Approach to Development Management) have also been largely assessed as positive, reflecting a presumption in favour of sustainable development in accordance with the NPPF.

No significant or minor negative effects were identified during the appraisal of the key development principles.

Overall, the policies that set out the key development principles for York are fundamental to realising the sustainable development aspirations for the City over the short, medium and longer term. They create a framework for the draft Local Plan which seeks to promote growth in a sustainable manner and which respects the unique characteristics of the City. Their effective implementation will make an important contribution to the future development of York (and the wider sub-region) whilst protecting and enhancing the City's built and natural environment, facilitating sustainable means of travel with direct benefits on the health of local residents (through improved air quality and opportunities for exercise).

5.4 Spatial Strategy

As described in **Section 4.5**, the appraisal of the spatial strategy has been undertaken by appraising those policies concerning the quantum and location of development in Chapter 3 (Spatial Strategy) of the draft Local Plan alongside the strategic sites and smaller (local) allocations. A summary of the appraisal of each component of the spatial strategy is presented in the following sub-sections.

5.4.1 Spatial Strategy Policies

Policies SS1 to SS10 form the spatial strategy of the draft Local Plan. The performance of these policies has been tested against the 15 SA objectives with the findings presented at **Appendix F**.

Overall, the policies have been appraised as having a significant positive effect on those SA objectives relating to housing, health, economy and equality and accessibility. Minor positive effects are expected against education, climate change, biodiversity, water, waste, cultural heritage and landscape SA objectives.

The quantum of growth to be accommodated in the City of York is established principally through Policy SS1 (Delivery Sustainable Growth for York) but supported through policies SS4 to SS10. This includes a minimum annual provision of 995 new dwellings over the plan period (and 1,170 dwellings per annum during the first six years of the Local Plan). The scale of provision means that a range of housing can be provided (particularly affordable housing) to meet the objectively assessed needs of the City. This will enable the building of strong, sustainable communities through addressing the housing and community needs of York's current and future population, including that arising from economic and institutional growth. This has been assessed as having a significant positive effect on SA Objective 1 (Housing).

Policy SS1, (and policies SS4 to SS10), also make provision for sufficient employment land to accommodate over 13,500 new jobs. York City Centre is identified as a priority area for a range of employment uses and three City

Centre sites are allocated as ‘Opportunity Areas’ including York Central (Policy SS9) and Castle Piccadilly (SS10). The delivery of these sites, alongside the requirement for proposals in City Centre locations to enhance the quality of the City Centre (including in respect of retail offer, enhancement of the public realm, traffic reduction and promotion of the evening economy – see Policy SS4), will help enhance the competitiveness of York. Overall, the number of jobs to be provided over the plan period and the focus of economic growth in York City Centre is expected to support sustainable economic growth, improve prosperity and ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York and North Yorkshire Sub Region (in accordance with the key development principles of the draft Local Plan). Overall, the policies of the spatial strategy have therefore been assessed as having a significant positive effect on SA Objective 4 (Economy).

Taken together, the spatial strategy policies are expected to enhance the health and wellbeing of York’s population including through:

- the provision of new high quality housing;
- preventing unacceptable pollution;
- the promotion of sustainable transport; and
- the protection and enhancement of access to open space (formal and informal).

This will be achieved at a City-wide scale and in relation to strategic sites where open space and service provision will accompany housing and other development and has been assessed as having a significant positive effect on SA Objective 2 (Health).

The provision of housing is also expected to have a significant positive effect on SA Objective 5 (Equality and Accessibility). The scale and broad location of housing proposed mean that a range of dwellings and community facilities can be provided (particularly affordable housing) to meet specific needs. In addition, the focus on the delivery of employment opportunities, services and facilities in York City Centre and at strategic sites as part of mixed use schemes is expected to help ensure that accessibility is maintained and enhanced.

Notwithstanding greenfield land-take associated with new development (and hence potential loss or displacement of biodiversity assets), there is a significant opportunity to realise improvements to the City’s green infrastructure network (including open space, biodiversity and geodiversity) through new provision, making links between existing resources and enhancing the management of resources, as well access enhancement generally. This is reflected in Policy SS1 and also through specific opportunities identified in policies SS5 to SS10. Overall, the spatial strategy policies have therefore been assessed as having a positive effect on SA Objective 8 (Biodiversity).

Significant levels of new development will inevitably bring change to the character of the City, particularly where this is associated with strategic sites. However, effects on the setting of the City can be managed and it is noted that Policy SS1 specifically seeks to conserve and enhance York’s historic assets and character whilst policies SS4 to SS10 include locational specific guidance in this regard. The re-definition of the City’s Green Belt through

policies SS2 and SS3 will also help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the City and look to concentrate development in the urban area, with attendant sustainability benefits. In consequence, the spatial strategy policies have been assessed as having a positive effect on SA objectives relating to cultural heritage and landscape.

An increase in population anticipated by Policy SS1 will have an inevitable negative effect on overall water usage and consumption across the City as well as waste generation. However, the scale of proposed development, particularly at the strategic sites covered by policies SS5-10, offers potential for the development of significant sustainable water and waste management. This aspect has been assessed as having a positive effect on SA objectives related to water and waste.

No significant or minor negative effects were identified during the appraisal of the spatial strategy policies.

Mixed positive and negative effects have been identified in respect of SA objectives related to transport, climate change and land use. With regard to transport, this reflects, on the one hand, the anticipated increase in vehicle movements linked to economic development and population (particularly in view of the distance of some strategic sites from areas of higher order service provision, although some degree of self-containment will be secured on larger sites), and on the other, the redevelopment proposals associated with York City Centre (Policy SS4), York Central (Policy SS9) and Castle Piccadilly (Policy SS10) which offer significant opportunities to provide for the co-location of living, working, shopping and other recreation. In terms of climate change, effects of the spatial strategy policies are likely to be mixed owing to increased emissions associated with new development but also opportunities for limiting carbon dioxide emissions through energy efficiency measures, renewable energy generation and facilitating sustainable travel. Mixed effects in relation to land use, meanwhile, reflect the significant proportion of new development that will be located on greenfield but the opportunities this presents for comprehensive masterplanning which would enhance green infrastructure resources.

5.4.2 Strategic Sites

As part of the preparation of the draft Local Plan the Council, has considered further which strategic sites are to be allocated in order to support the delivery of the spatial strategy. This is in response to new site submissions and further information on existing proposed allocations arising from consultation undertaken by the Council on the Local Plan Preferred Options and Further Sites Consultation.

To inform the selection of sites to be allocated in the draft Local Plan, all proposed strategic site allocations and alternatives have been subject to SA as part of the preparation of this report, including those that have already been subject to SA (in order to reflect the new information received) using the site assessment criteria (see **Appendix H**). Proposed/potential strategic site allocations have also been subject to more detailed assessment against the SA objectives. The appraisal matrix for each site is contained at **Appendix I**. A summary of the appraisal of the proposed strategic site allocations is presented **Table 5.2**.

There are also some aspects of the draft Local Plan where effects are more uncertain. These include biodiversity, water, waste, cultural heritage and landscape. This principally reflects the uncertainty surrounding the effects of development on these SA objectives that are in part unknown until detailed site development proposals come forward. However, the draft Local Plan includes policies which seek to manage impacts on these assets and in consequence, it is expected that significant adverse effects will be avoided.

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Table 5.2 Summary of Strategic Site Appraisal

Site Ref	Objective	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
	Site Name															
ST1	British Sugar / Manor School	++	+/-	+/-	+	++	++/-	+/-	+/-	++	-	-	-	+	+/-	+/-
ST2	Former Civil Service Sports Ground Millfield Lane	++	+/-	+/-	+	++	++	+/-	+	+	-	-	+/-	+	-	0
ST4	Land adj. Hull Road & Grimston Bar	++	+/-	+/-	+	+	++	+/-	-	--	-	-	+/-	+	-	-
ST5	York Central	++	+/-	++/-	++	+	++	+	0/?	++/?	-	-	+/-	-	-/?	+/-
ST7	Land East of Metcalfe Lane	++	+/-	+/-	+	++	+/-	+/-	+/-	--	-	-	-	+/-	-/-	-/-
ST8	Land North of Monks Cross	++	+/-	+/-	+	++	+/-	+/-	-	--	-	-	-	+	0/-	0/-
ST9	Land North of Haxby	++	0	+/-	+	+	+	+/-	+	--	-	-	-	-	-	-

Site Ref	Objective	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
	Site Name															
ST11	Land at New Lane Huntington	++	++	+	++	+	+	+/-	+	--	-	-	-	0	-	-
ST12	Land at Manor Heath Road Copmanthorpe	++	+/-	+/-	+	+	+/-	+/-	0	--	-	-	-	+	0/-	0/-
ST13	Land at Moor Lane Copmanthorpe	++	+/-	+/-	0	+	0	+/-	-	--	-	-	-	+	0/-	0
ST14	Land to North of Clifton Moor	++	+/-	+/-	+	++	+/-	+/-	-/?	--	-	-	-	+	-	-/-
ST15	Whinthorpe New Settlement	++	+/-	+/-	+	++	+/-	+/-	+/-	--	-	-	-	+/?	-	-/-
ST17	Nestle South	++	+/-	+/-	+/-	++	+/-	+/-	0/+	+	-	-	0	+	+/-	+/-
ST18	North of Monks Cross	0	+/-	+/-	++	0	++/-	+/-	-	--	-	-	-	+	0/-	0/-
ST20	Castle Piccadilly	0/+	+/-	+/-	++	+/?	++	+	-/?	++	-	-	+/-	-	-/?	+/-

Site Ref	Objective	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
	Site Name															
ST21	Designer Outlet (Leisure)	0	+/-	+	++	+	++/-	+/-	-	++	-	-	-	-	0/-	0
ST25	South of Designer Outlet	0	+/-	+	++	0	++/-	+/-	-	--	-	-	-	--	-	-
ST26	South of Airfield Business Park	0	-	+	++	0	--	--	-	--	-	-	-	+	-	-
ST27	Heslington East Campus and Extension	0	+/-	+/-	++	0	+/-	+/-	+	--	-	-	-	+	-	-/-
ST29	Land at Boroughbridge Road	++	+/-	+/-	+	++	++	+/-	+	+	-	-	+/-	+	-	0
ST30	Land to the North of Stockton Lane	++	+	+/-	0	0/+	+/-	+/-	?	--	-	-	-	+	-	-

The strategic sites predominantly comprise of housing developments with some leisure and employment allocations. The 15 sites which are proposed for new dwellings have all been assessed as having significant positive effects on housing due to the provision of more than 100 dwellings on each site, plus one further site (ST20 (Castle Piccadilly)), which has a mixed minor positive and neutral effect due to smaller scale mixed use. In total, the strategic sites listed in Table 5.2 above have capacity to accommodate 14,770 dwellings which will make a significant contribution towards meeting the objectively assessed needs of York over the plan period. Eight of the proposed strategic sites were also assessed as having a significant positive effect on SA Objective 5 (Equality and Accessibility) due to the number of affordable homes that could potentially be delivered and the presence of good access to local services and facilities, predominantly from the potential for a new community centre and facilities. The remaining strategic housing sites were assessed as having a minor positive effect on this objective.

A total of four strategic employment and leisure sites have been assessed as having a significant positive effect on SA Objective 4 (Economy). Collectively, these sites will deliver 156,800 m² of employment floorspace. The delivery of these sites is expected to generate a significant number of employment opportunities and will help ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York and North Yorkshire Sub Region. Strategic housing sites have also been assessed as having a significant positive or positive effect on this SA objective depending on the scale of temporary construction jobs, the availability of longer term employment opportunities in new local facilities, and the proximity of major employers and good transport links to support a flexible workforce and boost the local economy.

Nine sites were considered to have significant positive effects on transport, reflecting the excellent provision for sustainable transport such as nearby bus routes, Park and Ride, train stations and cycle routes. However, for four of these sites (ST1 (British Sugar / Manor School), ST18 (North of Monks Cross), ST21 (Designer Outlet (Leisure)) and ST25 (South of Designer Outlet)) effects were assessed as mixed given the potential for development to exacerbate local congestion. Minor positive and mixed minor positive and negative effects were recorded for transport for the other proposed strategic sites.

Strategic sites ST1 (British Sugar / Manor School), ST5 (York Central), ST20 (Castle Piccadilly) and ST21 (Designer Outlet (Leisure)) were assessed as having a significant positive effect on SA Objective (Land Use) as they would involve the reuse of previously developed (brownfield) land. Minor positive effects were also recorded against SA Objective 9 for three sites which involved the reuse of brownfield sites with expected land contamination issues. A single significant positive effect was recorded for ST11 (Land at New Lane Huntington) due to the anticipated health benefits associated with its accessibility to significant areas of open space, including existing local sports facilities and provision for a new children's play area, and against ST5 (York Central) for the significant provision of training and skills development in the longer term.

Other minor positive effect were identified in respect of flood risk for those sites in Flood Zone 1 and with the potential to incorporate surface water management techniques such as sustainable urban drainage systems (SuDS) which could help improve drainage and reduce flood risk.

A total of five strategic sites were assessed as having minor positive effects on biodiversity, with a further three sites having a mixed positive and negative effect and one additional mixed neutral and minor positive. The positive effects arise for those sites which are considered to have limited ecological value and which could be enhanced through the development (for example, by the inclusion of a green infrastructure/landscape strategy to ensure biodiversity corridors connect with adjacent green infrastructure). Mixed and negative effects arise for sites which are expected to result in a loss of biodiversity or ecological connectivity, and those which may affect local Sites of Importance for Nature Conservation (SINCs) or, in the case of ST1 (British Sugar/Manor School), ST15 (Whinthorpe New Settlement), ST21 (York Designer Outlet) and ST25 (South of Designer Outlet), nationally designated Sites of Special Scientific Interest (SSSIs). With specific regard to strategic sites ST1 and ST15, the potential for significant negative effects on biodiversity was identified owing to their location within 250m of a SSSI. However, effects on biodiversity are expected to be mitigated through the implementation of policies within the draft Local Plan, in addition to site-specific mitigation measures that may be introduced at the detailed planning application stage.

Four sites were assessed as having a minor positive effect on education and training due to the potential provision of training opportunities and skills development throughout the construction process and in new local businesses or community facilities. The remainder of the sites were assessed as having a mixed minor effect due to the enhancement of trade skills and the lack of proximity to schools or capacity to accept new students.

The majority of sites were considered to have a mixed minor positive and negative effect on SA Objective 2 (Health). This reflects, on the one hand, the potential for provision of open space and opportunities for outdoor leisure activities, and on the other, the short term construction noise which may affect nearby receptors, and longer term disturbances from road noise or industrial users.

Site ST26 (South of Airfield Business Park) was assessed as having a significant negative effect on climate change due to the size of the employment site and expected reliance on private car due to lack of sustainable transport options. The remaining sites were assessed as having a minor positive or mixed minor positive and negative effect on climate change. This reflects the likely overall increase in greenhouse gas emissions from plant and vehicles during the construction process and an increase in energy consumption from the completed dwellings and businesses but also the anticipated inclusion of mitigation measures in developments such as renewable energy.

Development of a large proportion of sites (14) would result in the loss of a substantial area of greenfield land which has been assessed as having a significant negative effect on land use. In the case of 16 sites, development would result in the loss of the 'best and most versatile' agricultural land (some of which also include areas of brownfield land and have therefore not been assessed as a significant negative effect). The 'best and most versatile' land is defined in Annex 2 of the NPPF as land classified as grades 1, 2 and 3a.

A single significant negative effect was identified for transport for ST26 as a result of an expected reliance on car use and associated local congestion. ST26 was also the only site considered to have a significant negative effect on

climate change as result of an increase in transport emissions. A significant negative effect was also recorded for ST25, the only site located in an area at high risk of flooding.

All 21 sites are considered to have the potential for a minor negative effect on water resources. This arises due to the increased pressure on local supplies as a result of higher demand. The area is forecast in Yorkshire Water's Water Resources Management Plan 2014 as being in supply and demand water deficit across the next 25 years, so the increased demand has the potential to cause reductions in water quality.

The increase in waste generated through the construction process in addition to the waste generated by households or businesses, some of which may be disposed to landfill, has resulted in all sites being assessed as having a minor negative effect on SA Objective 11 (Waste). The majority of the sites were also considered to have minor negative effects on air quality as a result of increased car use and congestion, with associated deterioration of local air quality. Five sites had a mixed effect on air quality, with the positive effect arising from notable opportunities for the use of low-emission sustainable transport.

Effects on SA objectives related to cultural heritage and landscape were predominantly assessed as minor negative due to potential for detrimental effects on historic assets, local culture and setting, archaeology and views. However, Land East of Metcalfe Lane (ST7) was assessed as having the potential for significant negative effects on these SA objectives whilst the potential for significant negative effect on landscape specifically was identified in respect of three sites (Land to North of Clifton Moor (ST14), Whinthorpe New Settlement (ST15) and Heslington East Campus and Extension (ST27)). However, in these instances it is expected that the adoption of mitigation measures will help to avoid the potential for significant negative effects to occur. In this respect, proposed policies within the draft Local Plan aim to mitigate adverse effects on York's setting and cultural heritage, so it is anticipated that negative effects would be minimised prior to development taking place.

A total of five sites (ST5 (York Central), ST7 (Land East of Metcalfe Lane), ST9 (Land North of Haxby), ST20 (Castle Piccadilly) and ST21 (Designer Outlet (Leisure))) are located in Flood Zone 2 and were therefore assessed as having minor negative effects against the flooding objective due to the moderate risk of flooding, or have a small area at high risk of flooding that is not expected to affect the development. Overall it is anticipated that other policies in the draft Local Plan have the potential to mitigate the effects on flood risk, and that this could be developed further at the planning application stage at which point detailed design and mitigation measures will also be considered (such as site layout, design and access and the incorporation of ecological enhancement measures and Sustainable Drainage Systems (SuDS)).

5.4.3 Local Sites

The City's remaining housing and employment land requirements are to be met at smaller (local) allocations. Like strategic sites, as part of the preparation of the draft Local Plan the Council has considered further which smaller scale sites are to be allocated in order to support the delivery of the spatial strategy. This is in response to new site

submissions and further information on existing proposed allocations arising from consultation undertaken by the Council on the Local Plan Preferred Options and Further Sites Consultation.

To inform the selection of sites to be allocated in the draft Local Plan, all proposed local allocations and alternatives have been subject to SA as part of the preparation of this report, including those that have already been subject to SA (in order to reflect the new information received) using the site assessment criteria. Additionally, sites for Gypsies, Travellers and Travelling Showpeople have also been subject to appraisal.

The performance of these sites against the 15 SA objectives is presented at **Appendix H**. A summary of the appraisal of those sites that are proposed to be taken forward as allocations is presented in **Table 5.3**.

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Table 5.3 Local Site Allocations Appraisal Summary

Call for Sites Ref	Allocation Ref	Site Name	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
<i>Proposed Housing Allocations</i>																	
11	H 28	Land to north of North Lane, Wheldrake	+	++	-	0	I	I	+	0	--	--	n/a	0	0	-	-
13	H 49	Station Yard, Wheldrake	++	+	-	0	I	I	+	0	+/-	0	n/a	0	0	0	-
49	H 27	Land at Brecks Lane, Strensall	++	+	-	0	+	+	+	-	-	0	n/a	0	-	-	0
58	H 8	Askham Bar Park and Ride Site	+	+	+	0	++	++	+	-	++	0	n/a	0	0	0	0
59	H 22	Heworth Lighthouse	+	++	+	0	++	++	+	-	++	0	n/a	I	0	0	0
72	H 33	Water Tower Land Dunnington	+	++	+	0	+	+	+	0	-	--	0	0	0	-	-
95	H 39	North of Church lane Elvington	+	+	+	0	I	I	+	-	-	0	n/a	0	0	0	0

Call for Sites Ref	Allocation Ref	Site Name	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
98	H2 3	Grove House EPH	+	++	++	0	++	++	+	0	++	0	n/a	I	0	-	0
99	H 21	Woolnough House EPH	+	++	++	0	++	++	+	0	++	0	n/a	0	0	0	0
121	H 3	Burnholme School	+	++	+	0	+	+	+	0	+/-	0	n/a	0	0	0	-
124	H 20	Oakhaven EPH	+	++	+	0	++	++	+	0	++	0	n/a	0	0	0	0
125	H 51	Morrell House EPH	+	++	+	0	+	+	+	-	++	0	n/a	0	0	0	0
127	H 5	Lowfields former school site	+	++	+	0	+	+	+	0	++	0	n/a	0	0	-	-
166	H 29	Land at Moor Lane	+	++	-	0	I	I	+	0	-	0	n/a	0	0	-	-
172	H 7	Bootham Cresent Football Stadium	+	++	++	0	++	++	+	0	++	0	n/a	I	0	-	0
180	H 50	Malton Road, Huntington	+	++	+	0	++	++	+	0	+/-	--	n/a	0	--	-	-

Call for Sites Ref	Allocation Ref	Site Name	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
192	H 12	Land RO Stockton lane off Greenfield Park Drive	+	++	-	0	++	++	+	0	-	0	n/a	0	0	0	0
193	H 40	West Fields Copmanthorpe	+	++	+	0	+	+	+	0	--	0	n/a	0	0	0	0
194	H 43	Manor Farm Yard	+	++	+	0	+	+	0	0	-	0	n/a	0	0	-	0
202	H 4	St Joseph's Monastery	++	+	+	0	++	++	+	-	+/-	--	n/a	--	0	-	0
298	H 47	Amalgomated Sites at Connaught Court Care Home	+	++	+	0	++	++	+	--	-	0	n/a	I	--	-	-
300	H 31	Amalgomated sites Eastfield Lane, Dunnington	++	++	-	0	+	+	+	0	+/-	-	n/a	0	0	0	0
305	H3 7	Land adjacent to Greystone Court, Haxby, York	+	+	+	0	+	+	+	-	--	0	n/a	0	-	-	-
308	H 6	Amalgomated sites RO Wilberforce Home/York College	+	+	+	0	++	++	+	0	-	0	n/a	0	0	-	-
322	H 30	Amalgomated sites South of Strensall	++	++	-	0	+	+	+	-	--	--	n/a	0	0	-	-

Call for Sites Ref	Allocation Ref	Site Name	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
472	H 1	Former Gas Site 24 Heworth Green	++	++	++	0	++	++	+	-	++	0	n/a	-	--	-	0
627	H 11	Land at frederick House East of Fulford	+	+	-	0	++	++	+	0	++	0	n/a	-	0	-	0
651	H 25	Heworth Green North (Forum Site)	+	++	++	0	++	++	+	-	++	0	n/a	--	--	0	0
654	H 19	Land at Mill Mount	+	++	++	0	++	++	+	0	++	0	n/a	-	0	-	0
677	H 38	Land RO Rufforth Primary School	+	+	+	0	+	+	+	0	--	0	n/a	0	0	0	0
696	H2 a	Sites by Racecourse Tadcaster Road A	++	+	-	0	++	++	+	-	+/-	0	n/a	0	0	-	-
696	H2 b	Sites by Racecourse Tadcaster Road B	++	+	-	0	++	++	+	-	+/-	0	n/a	0	0	-	-
757	H 48	Haxby Hall Elderly Persons Home	+	++	+	0	+	+	+	0	--	0	n/a	0	0	0	-
791 /17 7	H 9	Land at Askham lane	+	+	-	0	+	+	+	-	--	0	n/a	0	0	-	-

Call for Sites Ref	Allocation Ref	Site Name	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
<i>Proposed Employment Land Allocations</i>																	
64	E4	Land at Layerthorpe and James St	0	++	++	+/++	++	++	+	-	++	0	n/a	-	-	0	0
91	E 17	Amalgamated Land around Northminster Business park	0	-	-	++	++	++	+	0	--	--	n/a	0	0	0	-
138	E 15	Land at Hull Road	0	++	++	++	++	++	+	0	+/-	-	n/a	0	0	-	-
307	E 5	Amalgomated sites at James Street!	0	++	+	+	++	++	0	-	++	0	n/a	I	--	0	0
456	MU 1	Hungate	0	++	++	++	++	++	+	-	++	-	n/a	I	--	-	+
599	E 7	Wheldrake Industrial Estate!	0	-	-	+/++	--	--	+	0	++	0	n/a	0	0	0	0
600	E 8	Wheldrake Industrial Estate!	0	-	-	+	I	I	+	0	--	0	n/a	0	0	0	0
602	E 9	Elvington Industrial Estate!	0	++	++	+/++	I	I	+	0	--	-	n/a	0	0	0	0

Call for Sites Ref	Allocation Ref	Site Name	Housing	Health	Education	Economy	Equality & Accessibility	Transport	Climate Change	Biodiversity	Land Use	Water	Waste	Air Quality	Flood Risk	Cultural Heritage	Landscape
635	E 2	Land north of Monks Cross Drive	0	+	-	+ / ++	++	++	+	0	-	0	n/a	0	0	0	0
639	E 11	Annamine Nurseries	0	+	++	+ / ++	++	++	+	0	++	0	n/a	0	0	0	0
684	E 12	York Business Park	0	+	++	+ / ++	++	++	+	0	-	0	n/a	0	--	0	0
706	E 10	Chessingham Park remaining land	0	++	++	+			0	0	-	0	n/a	0	0	0	0
742	E 16	Poppleton Garden Centre	0	-	-	++	++	++	+	-	+ / -	0	n/a	0	0	0	0
<i>Proposed Gypsies, Travellers and Travelling Showpeople Allocations</i>																	
818	GT 2	Moor Lane	+	--	--	0			0	0	--	--	n/a	0	--	0	-
819	GT 1	Acres Farm	+	+	--	0	++	++	0	-	--	0	n/a	0	--	-	-
22	SP 1	The Stables	+	--	--	0			0	0	+ / -	--	n/a	0	0	0	-

Housing Sites

All proposed housing allocations have been assessed as having a positive effect on SA Objective 1 (Housing) with housing provision associated with the delivery of eight sites being of a scale considered to be significant (i.e. in excess of 100 dwellings). Cumulatively, this scale of provision is also considered to be significant, helping to meet the objectively assessed needs of the City. The majority of sites have also been assessed as having a significant positive effect on SA objectives relating to health and wellbeing, equality and accessibility and transport owing to their close proximity to key services and facilities and transport links. However, the performance of sites against SA Objective 3 (Education) was more mixed reflecting a variation in accessibility to educational facilities, particularly in respect of those sites located within the outlying villages such as Dunnington, Wheldrake, Strensall and Elvington.

Owing to their location on brownfield land, a total of 12 sites have been assessed as having a significant positive effect on land use. However, the development of several sites would result in the loss of greenfield land and in the case of 11 sites, this would comprise land classified as grades 1, 2 or 3 agricultural land (land in grades 1, 2 and 3a is classified as the 'best and most versatile' agricultural land at Annex 2 of the NPPF). For these sites, negative effects on land use have been assessed as significant.

With the exception of one site, all of the proposed housing allocations are considered to be of a scale that has the potential to incorporate/connect to district heating and combined heat and power networks. Overall, effects on SA Objective 7 (Climate Change) are therefore considered to be positive.

A number of sites have been assessed as having a negative effect on biodiversity with one site (Amalgamated Sites at Connaught Court Care Home) identified as having a significant negative effect on this SA objective. This reflects its close proximity (i.e. within 250m) to Fulwood Ings Site of Special Scientific Interest (SSSI). Significant negative effects have also been identified in respect of those sites that are within 10m of a waterbody (five sites in total) whilst two sites (St Joseph's Monastery and Heworth Green North (Forum Site)) are within an Air Quality Management Area (AQMA) and have therefore been assessed as having a significant negative effect on air quality. Four sites, meanwhile, are within/intersect Flood Zone 3a/3b and have been assessed as having a significant negative effect on flood risk. However, it is anticipated that the potential effects on these SA objectives could be mitigated through the application of draft Local Plan policies and at the individual planning application stage, when detailed design and mitigation measures will also be considered (such as site layout, design and access and the incorporation of ecological enhancement measures and Sustainable Drainage Systems (SuDS)).

Effects on SA objectives relating to cultural heritage and landscape have been assessed as being largely negative given the potential for impacts on the historic setting and character of the City. However, the draft Local Plan contains proposed policies which seek to minimise the adverse effects of development on the City's character and historic assets, the implementation of which are expected to reduce the potential for adverse effects on these SA objectives.

Employment Sites

Commensurate with the scale of employment land provision and the potential for job creation, all of the proposed employment site allocations have been assessed as having a positive effect on SA Objective 4 (Economy) with the scale of employment land provision (and hence potential job creation) associated with four sites having been assessed as significant. As with the proposed housing allocations, the majority of sites have also been assessed as having a positive, and in some cases significantly positive, effect on SA objectives relating to health and wellbeing, equality and accessibility and transport, although the assessment has revealed that the accessibility of a limited number of sites is poorer and in this regard one site (Wheldrake Industrial Estate) has been assessed as having a significant negative effect on SA Objective 5 (Equality and Accessibility) and SA Objective 6 (Transport).

The majority of the proposed employment allocations are of a size/scale considered to have the potential to incorporate/connect to district heating and combined heat and power networks. Overall, effects on SA Objective 7 (Climate Change) are therefore considered to be positive.

Significant negative effects are expected in respect of land use. Four sites are located on 'best and most versatile' agricultural land' (Northminster Business Park, Wheldrake Industrial Estate, Elvington Industrial Estate and Chessingham Park) whilst the delivery of a further five sites would involve development (either wholly or partly) on greenfield land. However, the assessment has identified the potential for significant positive effects on this objective in respect of five sites located wholly on brownfield land.

Effects on the remaining SA objectives are largely neutral. However, there is the potential for significant negative effects on biodiversity, water and flood risk associated with the implementation of a limited number of sites. Notwithstanding, it is anticipated that effects on these objectives could be mitigated through the application of draft Local Plan policies and at the individual planning application stage, when detailed design and mitigation measures will also be considered (such as site layout, design and access and the incorporation of Sustainable Drainage Systems (SuDS)).

Gypsies, Travellers and Travelling Showpeople

A total of three sites are allocated for Gypsies, Travellers and Travelling Showpeople. Site provision is expected to have a positive effect on SA Objective 1 (Housing) in helping to meet plot/pitch requirements identified in the Council's City of York Gypsy, Roma, Traveller and Travelling Showpeople Accommodation Assessment (2014). One site (Acres Farm) has also been assessed as having a significant positive effect on SA objectives relating to equality and accessibility and transport owing to its proximity to the transport network.

Whilst Acres Farm has been assessed as having a positive effect on health due to its close proximity to open space, the remaining sites have been assessed as having a significant negative effect on this SA objective due to their distance from open spaces and also GP surgeries. Significant negative effects have also been identified in respect of SA objectives relating to education, due to the distance of sites from educational facilities, and land use, due to

the likely loss of ‘best and most versatile’ agricultural land associated with the development of Moor Lane and Acres Farm. The potential for significant negative effects on water (in respect of Moor Lane and The Stables) and flood risk (Moor Lane and Acres Farm) has been identified owing to the proximity of the sites to watercourses and/or their location in Flood Zone 3. Minor negative effects associated with the delivery of one or more sites have also been identified in respect of cultural heritage, landscape and biodiversity. However, as with housing and employment allocations, it is anticipated that the potential effects on these SA objectives could be mitigated through the application of draft Local Plan policies and at the individual planning application stage, when detailed design and mitigation measures will also be considered.

5.5 Thematic Policies

The performance of the 75 thematic policies contained within the draft Local Plan (i.e. those contained sections 4 to 15) has been tested against the 15 SA objectives. Each policy has been individually assessed against the SA objectives and commentary provided describing the potential effects. Where appropriate, mitigation measures have been identified in order to address adverse effects and enhance positive effects.

The scores are only intended to serve as an indication of the types of effects that may occur based on the level of information available. The full findings of the appraisal are presented at **Appendix J**. A summary of the appraisal is presented in the following sub-sections, grouped by draft Local Plan chapter.

5.5.1 Economy and Retail

Section 4 of the Local Plan contains ten policies which identify those site which will accommodate different types of economic growth, protect overall supply of employment sites and addresses specific aspects of economic growth including retail development. Overall the policies have been appraised as having a positive effect on the SA Objectives, in particular significant positive effects are expected against health and wellbeing, jobs, equality and access and travel. Minor positive effects are anticipated against the housing, education, land resources and waste objectives.

Oxford Economic Forecasting (OEF) produced a series of predictions for York for the period 2013 to 2030 which shows the workforce growing from 112,857 to 126,412 and GVA growth of 2.8% per annum. Policy EC1: makes provision for a range of employment development during the plan period including the identification of 144,000m² strategic sites for Research and Development, light industrial, storage and distribution, leisure uses and further employment sites to meet the forecast demand. The policy identifies that the City Centre will remain the focus for main town centre uses and such uses outside of the City Centre will only be considered acceptable where it can be demonstrated that they will not have a detrimental impact on the city centre’s viability. The delivery of the identified sites will enhance the competitiveness of York. The implementation of this policy will help to increase employment land and create significant employment opportunities to support sustained economic growth.

Policies EC2 to EC6 provides the policy framework for economic growth in the health and social care sectors, loss of employment land, residential and industrial uses within residential areas, tourism and the rural economy. The emphasis of these policies to promote new development in appropriate locations which accord with the wider policy requirements of the local plan has been appraised broadly positively.

Overall the employment and retail policies (R1-R4 inclusive) have been assessed as having a significant positive effect on SA Objective 4 (jobs and economy) through the identification of new floorspace to meet the requirement of over 160,000m². The support for growth in the health and social care sectors will make a positive contribution to economic growth as well as supporting wider social care requirements for an ageing population. The implementation of policy EC3 would help to ensure that any development proposals would not lead to the loss of deliverable employment sites which are necessary to meet employment needs during the plan period. Policies EC5 and EC6 will provide opportunities to support tourism related development and to help to sustain and diversify the rural economy. The implementation of Policy R1 would help to maintain and enhance the viability and vitality of the city centre, district and neighbourhood centres whilst Policy R4 will help to ensure that out of centre retailing is only permitted in specific circumstances and where it could be demonstrated that there would be no adverse impacts on the city centre.

The creation of new employment opportunities identified through policies EC1, EC2, EC5 and EC6 are expected to have a minor positive effect on SA Objective 3 (Education and Skills). The effect of the retail policies was considered to be neutral. It is anticipated that the increase in the amount of employment opportunities will also create opportunities for training and education. However this will depend in part upon the individual employment practices of any business. Increasing the availability of employment will help to increase employment opportunities through the identification of specific sites and through the identification of a retail hierarchy and have been appraised as a significant positive against SA Objectives 5 (Equality and Accessibility) and 6 (Reducing the Need to Travel) and 12 (Air Quality).

The retail hierarchy set out in Policy R1 would help to reduce the need to travel by ensuring that services and facilities are located in existing locations which are already well served by public transport. The focus on the delivery of employment opportunities across the city and maintaining the role of the city centre is expected to maintain and enhance accessibility. However, a positive and negative assessment was applied to Policy EC1 on the basis that whilst sustainable locations were sought for new employment development across York it is inevitable that new employment sites will generate an increase in vehicles and vehicle movements above the existing baseline. The positive and negative assessments have been replicated on Objective 7 (Greenhouse Gases) for Policy EC1, EC2, EC4 and EC5 due to an increase in vehicle movements, which are forecast to increase across York by 2.5% per annum, resulting in an increase in greenhouse gas emissions. This will need to be adequately mitigated through the preparation of Travel Plans and through the provision of infrastructure which supports cycling and walking to promote changes in travel behaviour. It will be important for the Local Plan to ensure that any economic development does not exacerbate any problems in respect of York's existing Air Quality Management Areas. These are found around the inner ring road in York City Centre and separately at Fulford. Mitigation

measures, notably contained within Policy ENV1 require development within these areas to ensure that nitrogen concentrations are reduced.

Significant levels of growth and new development will result in change to the character of York. New economic development could have adverse effects on York's historic environment and culture. Site appraisals have identified that some employment sites will have a negative effect due to their scale and location. There will be mitigation from other policies within the Local Plan, in particular through design policies and protecting heritage assets. However, for the purposes of this assessment the overall effects on Objective 14 (Historic Environment) and 15 (Natural and Built Landscape) were assessed as uncertain against Policies EC1, EC2 and EC6. Policies R1-R4 have been assessed as having a neutral effect on these objectives. The strengthening of the role of existing centres and limiting out of centre development. The HIA has identified that concentrating town centre uses within the City Centre will help to maintain the city's dense urban fabric.

The focus of delivering employment sites on brownfield land (approximately 40% of economic development sites are identified as being on brownfield land) and the emphasis of the retail policies upon strengthening the role of existing centres and therefore reducing the amount of greenfield land required for new retail developments will promote the positive use of land. In response to this, Policies EC2, EC3, EC6 and R1-R4 have been appraised a minor positive against Objective 9 (land use).

No significant negative effects were identified during the appraisal of the Economy and Retail policies.

5.5.2 Housing

Section 5 of the Local Plan sets out the policies and allocations required to address the housing challenge of providing both a sufficient number of new homes and an appropriate type and mix to meet the City's needs. The delivery of this objective is contained within Policies H1 – H9. Overall, the policies have been appraised as having a significant positive effect on those SA Objectives relating to housing, health and equality. Minor positive against jobs, travel, waste, historic environment and natural and built environment objectives have also been identified.

Policy H1 identifies those sites which have been allocated to meet the housing requirement set out in Policy SS1 (and policies H6 and H7 identify locations for Gypsy, Roma, Travelling and Travelling Showpeople Sites and Student Housing respectively). As identified in Section 5.41 Policy SS1 identifies the quantum of growth to be accommodated in York, this includes a minimum annual provision of 995 new dwellings over the plan period (and 1,170 dwellings per annum during the first six years of the Local Plan). This equates to a requirement to accommodate 16,980 dwellings over the plan period. In addition a 20% buffer is added to the supply of housing providing an uplift of 174 dwellings per annum for the first six years of the plan period to address previous under provision as required by the NPPF. The level of growth proposed through these policies will meet the housing and community needs of York's current and future population based on research undertaken by consultants on behalf of York City Council.

The implementation of Policies H2 (Density of Residential Development), H3 (Balancing the Housing Market) and H4 (Housing Mix) will help to ensure that there is a good balance and mix of housing provided as part of new housing developments which would be particularly important in meeting the housing needs of York. Policy H6 (Gypsy, Roma, Travelling and Travelling Showpeople Sites) would help to address a shortfall of accommodation for these groups with baseline information demonstrating a need for 63 Gypsy and traveller pitches and 21 plots for showpeople. The implementation of Policy H7 (Student Housing) will help to meet the housing needs of students where there is a proven need and Policy H8 (Houses in Multiple Occupation) will help to control the number of houses which are in multiple occupation in order to control issues of overcrowding. The implementation of Policy H9 would help improve affordability across the housing market in York. These policies have been assessed as having a significant positive effect on SA Objective 1 (Housing). For Policy H5 (Promoting Self Build) a minor positive effect has been recorded on the SA Objective 1 on the basis that the scale of provision which is being promoted equates to 2% of the land of the four largest strategic sites. It has been concluded that whilst Policy H5 can make an important contribution to the diversity of choice it will not have a significant effect on this objective.

The implementation of these policies within the Housing Section will result in the delivery of good quality housing comprising a mix of housing types. Living in the right type and quality of housing is considered to have significant positive health benefits. The safeguarding and provision of sites for pitches to meet the future needs of Gypsy, Roma, Traveller and Travelling Showpeople is likely to have positive health benefits for those groups. The delivery of affordable housing providing the community with access to good quality housing is also considered likely to have a significant effect on health. Accordingly the housing policies have been appraised as having a significant positive effect against SA Objective 2 (Health).

The provision of housing (particularly through Policies H1, H6 and H9) is also expected to have a significant positive effect on SA Objective 5 (Equality and Accessibility). As noted in the appraisal of the Spatial Strategy, the scale and broad location of housing proposed mean that a range of dwellings and community facilities can be provided to meet local needs.

The implementation of policies H1, H2, H3, H4, H5 and H7 would help to deliver a significant amount of new housing within York. The scale of development proposed over the Local Plan period would help to create and support construction jobs which accounts for approximately 6% of the total employment across the city. The scale of change will inevitably lead to an increase in traffic generation associated with the new housing. Policy H2 sets out the net densities that housing development will be expected to achieve which identifies that the highest density should be delivered within the City Centre (100 units/hectare) where there are good established public transport links. These significant changes will bring change to the character of York. New housing development in inappropriate locations or poorly designed could have adverse effects on York's historic environment. However, when considered alongside other policies in the plan, including D2, D4, D5, D7 and D10 it is considered that the development of housing which is in accordance with these policies would help to conserve York's historic environment by ensuring good design and avoiding adverse effects. Accordingly the housing policies have been appraised as having a minor positive effect against SA Objectives 4 (Jobs and Economy), 6 (Travel), 14 (Historic Environment) and 15 (Natural and Built Landscapes).

Mixed neutral and negative effects have been identified against objective 7 (Greenhouse Gases) on the basis that construction activity and occupancy of new homes is likely to generate an increase in emissions. There could also be an increase in emissions associated with the energy consumption from the occupation of the new houses. However, Policy CC1 requires that new developments will be required to incorporate renewable and low carbon sources of energy and energy efficiency. Policy CC2 requires that all new development will be expected to consider the principles of sustainable design and construction and to make carbon savings through reducing energy demand, using energy and other resources efficiently. Policy CC2 also requires that pre 2016; all new residential development should achieve Code for Sustainable Homes Level 4. The requirements of these policies would help to ensure that new housing developments are sustainably built, minimise greenhouse gas emissions and to help manage the response to climate change.

Positive and negative effects associated with the implementation of Policies H1, H3, H4 and H5 have been recorded against Objective 9 (Land Use) on the basis that approximately 33% of the proposed housing sites are on brownfield land. However the implementation of Policy H2 would help to achieve a good density for residential development ensuring the efficient use of land.

5.5.3 Community Facilities

Policies CF1-4 provide the policy framework for the provision of a diverse range of community facilities including libraries, crèches, day centres, sports facilities and healthcare and emergency services in accessible locations. The Local Plan identifies that it is important that good quality community facilities accessible to all are available locally and are well connected to communities to meet their day to day needs. In providing services close to communities it reduces the need for people to travel, particularly benefiting the less mobile. It is also important that city-wide facilities are accessible by public transport, walking and cycling to ensure that they are accessible to all.

Accordingly, Policies CF1 (Community Facilities) CF2 (Built Sports Facilities), CF3 (Childcare Provision) and CF4 (Healthcare and Emergency Services) have been appraised as having significant positive effects against SA Objectives 1 (Housing), 2 (Health) and 5 (Equality and Access).

The provision of services in reasonable proximity to people's homes will help to ensure that day-to-day requirements and demands can be catered for, particularly for those reliant upon local provision. The requirements of CF1 in delivering accessible services should help to reduce the need to travel. Any reduction in vehicle movements is considered to have benefits in terms of reduced greenhouse gas and vehicle emissions. As a result, the Community Facilities Policies have been appraised as having a minor positive effect on SA Objectives 6 (Travel), 7 (Greenhouse Gases) and 12 (Air Quality).

No significant or minor negative effects were identified during the appraisal of community facilities.

It was considered that there was no direct relationship between Policies CF1-4 on SA Objectives 3 (Health), 4 (Jobs), 10 (Water Efficiency), 11 (Waste), 13 (Flood Risk), 14 (Historic Environment) and 15 (Natural and Built Landscape).

5.5.4 Education

There is a clear link between York's population and the continuance of a vibrant economy through the working age population. In order to support economic growth, there needs to be a local workforce with the skills, experience and abilities to support businesses. Policies ED1-ED8 contains policies relating to education and education establishments within the Local Plan. The policies focus upon making York a world class centre for education providing the quality and choice of learning and training opportunities to meet the needs of children, young people, adults, families, communities and employers. Policies ED1-ED5 focuses upon supporting appropriate development at the University of York Campuses, Heslington West Campus, Heslington East Campus, Lord Mayor's Walk Campus and York St. John University Further Expansion. Policies ED6 relates to the provision of sufficient modern preschool, primary and secondary school education. Policy ED7 supports expansion of further and higher education facilities and Policy ED8 promotes community use of new/extended education facilities.

The policies have been assessed as having a significant positive effect upon SA Objectives 1 (Housing), 2 (Health), 3 (Education), 4 (Jobs) and 6 (Travel). The provision of appropriate and sufficient education and training opportunities is an important part of the development of an effective workforce. The current educational attainment within York is relatively high providing a pool of skilled labour which fulfils the needs of local businesses. Support for the City's Universities under Policies ED1-5 is considered to be of particular importance in helping to develop and retain a highly qualified workforce. The provision of education and training is considered fundamental to health and well-being, providing an opportunity for the population of York to realise their potential. The opportunity for community access to sports facilities under Policies ED6 and ED8 has also been appraised positively against the health objective. The provision of locally accessible education, recreation and training will provide opportunities to influence patterns of movement which may make an important contribution to minimising travel and travel by car in particular.

The implementation of the education policies will help to ensure that there is equality of access to education facilities across the City and appropriate to new and existing local communities. The implementation of the Education Policies therefore has the potential to have a minor positive effect on SA Objectives 5 (Equality) and 9 (Land Use), particularly where new education facilities provide community access thereby reducing the demand for additional facilities. Minor positive effects are also anticipated in relation to SA Objectives 12 on the basis that accessible education facilities which help to minimise a reliance upon travel by car (as outlined above) will make a positive contribution to counter a continued decrease in air quality across the City.

Those policies which are directly related to the University Campuses (ED1-ED5) have been appraised positively against Objectives 14 (Historic Environment) and 15 (Natural and Built Environment). The campuses are

considered to be integral to the City's character and subject to implementation new development at these campuses can make a positive contribution to sustainable development within the City.

Uncertain effects were recorded against SA Objectives 10 (Water Efficiency) and 11 (Waste) on the basis that new development could increase demand for water resources and generate waste arisings associated with construction (and demolition).

No significant or minor negative effects were recorded against any of the SA Objectives.

5.5.5 Placemaking and Design

The Local Plan identifies that York's built and historic environment is of outstanding quality. The baseline assessment has identified that the City of York is one of only five historic centres in England that has been designated as an Area of Archaeological Importance as the archaeology is of national and international significance. York's wealth of historic assets includes:

- York Minster, England's largest (surviving) medieval church and the largest Gothic Cathedral in Northern Europe;
- 2,228 listed buildings of which 242 (15%) are Grade 1 and II*;
- 22 scheduled monuments in the city including the city walls, York Castle, Clifford's Tower and St Mary's Abbey;
- Registered historic parks and gardens, which include the Museum Gardens and Rowntree Park;
- 35 designated Conservation Areas, each of which is covered by Conservation Area Appraisal and have extra controls applied to them so that the character of the area can be preserved and enhanced.

The built and historic environment is identified as being central to York's economic success in the past and will continue to be so in the future. This legacy is also an importance benchmark when considering the quality of future development in York. Section 8 of the Local Plan provides the policy requirements to help achieve this objective. The policies D1 (Landscape and Setting), D2 (Placemaking) and D3 (Extensions and Alterations to Existing Buildings) clearly set out those requirements expected of development proposals in relation to demonstrating a thorough understanding of York's special qualities its urban structure and grain, density, its skyline and views and the need to sustain the significant of heritage assets. The City of York Council has adopted a positive policy framework through Policies ED4 (Conservation Areas) and ED5 Listed Buildings) around Conservation which identifies that development proposals will be supported where they are designed to enhance the special character and appearance of Conservation Areas and Listed Buildings. The protection of archaeological features (Policy ED7), Historic Parks and Gardens (ED8) and Non-Designated Historic Assets (ED10) which identify the need to assess the significance of development proposals upon these assets have all been appraised as having a significant positive effect against SA Objectives 14 (Historic Environment) and 15 (Natural and Built Landscape). The need

to create high quality shopfronts (Policy D11), appropriate advertisements (Policy D12) and restrictions to security shutters (Policy D13) were also assessed as having a significant positive effect against these objectives.

Policy D2 identifies that development proposals will be supported where they improve poor existing urban and natural environments. The need to consider the ease of public pedestrian and cyclist movement and to establish natural patterns of connectivity was assessed as having a significant positive effect upon Objective 6 (Travel).

Policy D1 requires developers to recognise the significance of landscape features and also the interrelationship between good landscape design and biodiversity enhancement. Accordingly the policy is considered to have a significant positive effect upon Objective 8 (Biodiversity).

The implementation of Policy D2, through its promotion of good design and promotion of safe pedestrian and cyclist movement which will help to reduce crime and fear of crime will be conducive to encouraging walking and cycling has been recorded as a minor positive effect against Objectives 2 (Health) and 7 (Greenhouse Gases).

No significant or minor negative effects were identified in the assessment of Policies D1-D13 against the SA Objectives.

5.5.6 Green Infrastructure

Policies GI1 to GI6 form the Green Infrastructure Chapter of the Local Plan. Green Infrastructure is the term used for the overarching framework related to all green assets, comprising landscapes, geodiversity, biodiversity and natural environment. The delivery of integrated Green Infrastructure has the potential to yield a range of significant benefits to York with resultant positive assessments against a range of the SA Objectives. The approach adopted to Green Infrastructure by York involves protecting, enhancing and extending biodiversity habitats and landscapes and also to support multifunctional benefits of Green Infrastructure e.g. promoting opportunities for walking, cycling and equestrian routes with resultant benefits for adaptation to climate change and flood storage as well as enhancing the landscape within the City. The Green Infrastructure Policies have therefore been appraised as having significant positive effects against SA Objectives 2 (Health) due to the opportunity for people to engage actively within these open spaces, but also due to the part these policies will play in helping to improve the City's air quality. The policies will also enhance the environmental quality making a significant contribution to further enhancing the City's image as an attractive place to live, work and visit, in turn benefiting the City's economy to the benefit of its population and their well-being.

Policy GI5 identifies that development proposals will not be permitted which would harm the character of, or lead to the loss of open space of environmental and/or recreational importance. Policy GI6 identifies that all residential development will be expected to contribute towards the provision of open space for recreation and amenity on-site. The retention and provision of accessible open space for all residents will help to minimise the need to travel and will form part of an overall strategy to encourage a modal shift towards cycling and walking. This has been appraised as a significant positive effect against Objectives 5 (Equality), 6 (Travel) and 7 (Greenhouse Gases) and

12 (Air Quality). The safeguarding of the City's Green Infrastructure, which is an explicit requirement within Policies GI1-5 has been identified as having a significant positive effect upon SA Objective 9 (Land Use).

It is considered that the Green Infrastructure Policies are the centrepiece in realising the aspiration of SA Objective 8 (Green Infrastructure) and as such the policies have been appraised as having a significant positive effect upon this objective. The key test will be upon the effective implementation of these policies to provide genuine connectivity between various open spaces with the resultant opportunities to promote access for health benefits or to facilitate more sustainable modes of travel.

Policy GI1 identifies that green infrastructure in the form of Common Land, Village Greens and other local green spaces have an important role to play in protecting and enhancing the historic character of York and Policy GI2 identifies the need to maintain and enhance cultural and historic landscapes, whilst GI3 highlights the need to retain trees or hedges which make a positive contribution to Conservation Areas or to the setting of a Listed Building. Green Infrastructure is considered to be a fundamental part of the historic character of the City. The policies have therefore been identified as having a significant positive effect on Objectives 14 (Historic Environment) and 15 (Natural and Built Environment).

The implementation of Policies GI1-6 will facilitate the creation of an attractive setting for new houses and access to natural environments and recreational activities for all residents. The establishment of a Green Infrastructure Network across the City could provide a range of opportunities for the training and tourism opportunities. Minor positive effects have been identified against SA Objectives 1 (Housing), 3 (Education) and 4 (Employment).

No minor or significant negative effects were identified during the appraisal of the Green Infrastructure Policies.

5.5.7 Managing Appropriate Development in the Green Belt

The Local Plan creates a Green Belt for York which will assist in preserving and enhancing the special character and setting of York. Policies GB1-GB4 provides the policy framework to deliver this policy objective.

York's Green Belt plays a significant role as part of the setting for the City and its overall character, particularly with regard to preserving long-distance views into the City. It is considered that Policies GB1 (Development in the Green Belt) and GB2 (Development in Settlements "Washed Over" by the Green Belt) are able to deliver this objective on a City-wide scale in the short, medium and long term. In light of this, Policies GB1 and GB2 have been appraised as having significant positive effects upon SA Objectives 14 (Historic Environment) and 15 (Natural and Built Landscape). Policy GB3 which identifies the criteria for the reuse of buildings outside of settlement limits within the Green Belt has been appraised as having a minor positive effect against this objective.

The Green Belt provides an important recreational and landscape resource for the City's residents, thus contributing to their well-being. The implementation of Policy GB1 which places restrictions upon built development within the Green Belt can help to protect this resource with benefits for health and also biodiversity and land use (SA

Objectives 2, 8 and 9). Restrictions on built development will constrain locations for housing development (although Policy GB4 does identify that the development of affordable housing on exception sites may be permissible) and may constrain commercial development formation or expansion. Accordingly, Policy GB1 has been appraised as having minor negative effect on SA Objective 1 (Housing) and a minor negative/uncertain effect on Objective 4 (Employment). However by focusing development within the urban area, particularly through Policy GB1 there is the potential for minor positive effects associated with reducing the need to travel by concentrating homes and services together and as a result reducing greenhouse gas emissions. As a result minor positive effects have been recorded against Objectives 6 and 7.

No significant negative effects were identified during the appraisal of the Green Belt Policies.

5.5.8 Climate Change

Chapter 11 of the draft Local Plan includes two policies which detail how York will tackle the challenges of climate change. The two policies are CC1: Renewable and Low Carbon Energy Generation and CC2: Sustainable Design and Construction. Policy CC1 identifies that the generation of renewable and low carbon energy will be supported within the context of sustainable development and responding the climate change. Furthermore new development will be required to incorporate renewable and low carbon sources of energy and energy efficiency. The policy also identifies three proposed solar farms which are identified on the proposals map.

Policy CC2 requires all new development to consider sustainable design and construction and to make carbon savings through reducing energy demand, using energy and other resources efficiently by generating low carbon/renewable energy.

Both policies have been identified as having positive effects on most SA Objectives with those being significant in respect of greenhouse gases and job creation. These significant positive effects arise from the potential to help mitigate the forecast 31% rise of carbon emissions within York by 2050. Full implementation of these policies has the potential to create the conditions within which a City-wide low carbon economy could be created with resultant increase in employment and opportunities within the low carbon sector.

The implementation of policy CC2 is likely to result in higher sustainable construction standards leading to improvements within future housing stock and providing opportunities for people to occupy/own energy efficient housing. The requirement that all new non-residential buildings should achieve BREEAM 'excellent' will ensure that all new qualifying developments have considered aspects of sustainable location including the proximity of good public transport networks as well as delivering improvements to water efficiency and consumption and waste reduction. Accordingly, Policy CC1 has been appraised as having a minor positive effect on housing, health, equality, travel, water, waste and air quality.

No significant or minor negative effects were identified during the appraisal of the Climate Change Policies.

5.5.9 Environmental Quality and Flood Risk

Chapter 12 of the draft Local Plan includes five policies which seek to prevent unacceptable risks from pollution, contamination, land instability and flooding. The policies seek to prevent development which would have an unacceptable impact on air quality (ENV1), pollution (ENV2), contamination (ENV3), flood risk (ENV4) and to promote sustainable drainage (ENV5). The policies have all been appraised as being broadly positive when assessed against the SA Objectives. The delivery of policies ENV1 and ENV2 which seek to avoid exacerbating air quality and pollution impacts are considered to have significant positive effects in relation to the health and well-being of York's population. The implementation of emission strategies alongside planning applications will assist in helping to improve air quality consistent with the requirements of Air Quality Management Plans. Policy ENV2 seeks to control development which would result in future occupiers and existing communities being subject to significant adverse environmental impacts such as noise, vibration, odour, emissions/fumes, dust and light which resultant benefits on air quality.

In accordance with Part 2a of the Environmental Protection Act 1990, York has a duty of investigate potentially contaminated sites. The implementation of Policy ENV3 will assist in identifying and addressing contaminated land within the City. The remediation of contaminated/brownfield sites has the potential to have a positive effect on human health and potentially features of biodiversity value. The remediation and reuse of brownfield sites also represents an efficient use of land and a means to prevent contaminated surface water being discharged in to local watercourses.

As identified within the baseline section there is a well documented history of flooding from the River Ouse, with the records for York dating back to 1263. More recently, the Ouse hit the local and national media headlines as a result of widespread flooding in autumn 2000 and high river levels in September 2012. Flood risk is predicted to alter in the future due to climate change and sea level rise. Climate changes may result in different rainfall patterns, which could increase the flood risk and as a result of sea level rise the flood risk in the tidal parts of the Ouse catchment area will increase. In accordance with the NPPF, Policy ENV4 requires an assessment of flood risk for development proposals on sites over 1 hectare or in flood zone 2, 3a, 3a(i) and 3b, the policy also requires a flood risk assessment to be submitted with any planning application where flood risk is an issue. Policy ENV5 requires development to restrict surface water run-off through attenuation as a means to prevent pollution and to avoid adverse impacts on water quality. These policies have been assessed as having a significant positive effect on Objective 13 (Flood Risk) whilst policy ENV5 is considered to have a significant positive effect in relation to Objective 10 (Water Efficiency).

No significant or minor negative effects were identified during the appraisal of the Environmental Quality and Flood Risk Policies.

5.5.10 Waste and Minerals

York City Council's waste management strategy involves reducing the amount of waste sent to landfill. Policy WM1: Sustainable Waste Management identifies that sustainable waste management will be promoted through waste prevention, reuse, recycling, composting and energy recovery in accordance with the waste hierarchy. In order to achieve this, the City of York will work with North Yorkshire County Council to manage residual municipal wastes, safeguard existing waste facilities and identifying suitable alternative capacity for municipal and other wastes. The policy will seek to promote the integration of facilities for waste prevention, reuse, recycling, composting and recovery in association with the planning, construction and occupation of new housing, retail and other commercial sites.

Policy WM2: Sustainable Minerals Management, requires mineral resources to be safeguarded to reduce the consumption of non-renewable mineral resources by requiring developers adopt good practice in relation to reuse, recycle and disposal of construction materials and through the identification of mineral safeguarding areas. The City Council would only allocate future areas for mineral extraction where there would be no adverse impact on York's heritage and where sites are accessible.

Effects associated with both policies have been assessed as broadly positive, particular in relation to reducing waste generation and encouraging recycling and minimising the volume of waste arisings which are sent to landfill with resulting positive effects on health. The control measures to be adopted in defining potential locations for waste or mineral sites will help to ensure that there are no adverse impacts on the health of the local population, features of biodiversity interest/value or upon the setting of York's built and natural environment.

No significant or minor negative effects were identified during the appraisal of the Waste and Minerals Policies.

5.5.11 Transport and Communications

Section 14 of the draft Local Plan contains those policies which relate to transport and communications. The draft Local Plan identifies that an effective transport network enables people to access work, services, leisure and other facilities in an efficient and safe way. Preliminary transport modelling predicts that the number of trips undertaken on the highway network overall could increase by approximately 2.5% per year, on average, over the Local Plan period and could leading to significant increases in delay on it. Measures proposed in the draft Local Plan should reduce congestion through improvements to the transport network in key locations and the promotion of alternative modes of transport.

Within this context Policies T1-T3 and T5 promote sustainable access through considering the location and layout of new development which includes provision for pedestrians, cyclists and alongside improvements to public transport or accessibility to high frequency bus routes can help to reduce dependence upon private cars. To facilitate this modal change, Policy T2 identifies as series of strategic public transport improvements including the provision of a new railway station at Haxby and provision of new, expanded park and ride facilities. Policy T3

focuses upon improvements at York Railway Station which is identified as being the second busiest station in Yorkshire and Humber (after Leeds). Policy T5 identifies a series of short, medium and long term proposals to improve the strategic cycle and pedestrian network across York. Taken together, these policies are considered to have significant positive effects upon SA Objective 6 (Travel). The implementation of these policies along with T7 (Demand Management) and T8 (Minimising and Accommodating Generated Trips) provide for the management and control of car parking spaces and the requirement for travel plans which are essential components of an effective transport strategy which can support behavioural changes and facilitate a modal shift. Such a change, provides positive direct and in-direct effects on health, employment, equality, greenhouse gas emissions and air quality.

The implementation of Policy T6 which would help to prevent the loss of disused public transport corridors and facilities to allow for the possibility of returning them to their former use or for new uses such as cycleways, bridleways or wildlife corridors. However, this would not directly help to reduce the need to travel and deliver a sustainable integrated transport network. There would therefore be no significant effects from the implementation of this policy on the travel objective.

Conversely, the implementation of policy T4 (Strategic Highway Network Capacity Improvements) could result in an increase in vehicle use, which would be incompatible with the need to reduce travel. However, there is a distinction between measures looking to reduce travel within the city including between new residential areas and new places of employment, and any measures aimed at improving the strategic road network which will include journeys between York and other strategic destinations. Any measures that look to improve intercity movement (such as those providing upgrades/improvements to the A64, A1237 and A19) could increase vehicle movements. For these reasons it is considered that there would be negative effects from the implementation of this policy on the travel objective.

Whilst none of the Transport and Communication policies would directly create jobs and deliver growth, maximising the use of sustainable modes of transport and improvements to public transport as set out in Policies T1 and Policies T2 would help to ensure that economic growth is sustainable. These policies would help to ensure that travel associated with any new jobs created are sustainable and can be accommodated within York's integrated transport infrastructure.

Policy T9 supports the development of a freight consolidation centre at a site near Askham Bryan which would facilitate disparate multiple deliveries which would otherwise require individual deliveries to premises in the City. This would help to ensure more efficient delivery of freight across York and the wider Yorkshire region and beyond. This would help to deliver economic growth and have positive effects on reducing the need to travel.

Policy C1: Communications Infrastructure provides the criteria against which communications infrastructure proposed within York would be supported. The delivery of high quality communications infrastructure is considered to be essential to supporting all facets of modern life, personal and commercial communications. The implementation of this policy which supports the development of new infrastructure where adverse effects will

arise is considered to have minor positive effects on SA Objectives relating to education, employment, equality and land use.

No significant negative effects were identified during the appraisal of the Transport and Communication Policies. Minor negative effects were recorded against Policy T4 in relation to the SA Objectives relating to travel, greenhouse gases, land use and air quality.

5.5.12 Delivery and Monitoring

The Delivery and Monitoring section contains a single policy; DM1: Infrastructure and Developer Contributions. The draft Local Plan identifies that developers will be required to provide the infrastructure to service their development and to mitigate any direct local impacts. In addition developers will be required to contribute to the provision of infrastructure necessary to ensure their development achieves wider Local Plan objectives. The infrastructure requirements required through the implementation of the Local Plan will be identified through the Infrastructure Delivery Plan. The adoption of Policy DM1 provides the necessary policy context to secure infrastructure provision which will assist the Local Plan in securing sustainable development in accordance with the vision and outcomes which underpin the Local Plan and will assist in delivering growth across the City whilst meeting the needs of its existing and increasing population. Accordingly Policy DM1 is considered to have a minor positive against most of the SA Objectives.

5.6 Cumulative, Synergistic and Indirect Effects

In determining the significance of effects of a plan or programme, the SEA Directive requires that consideration is given to the cumulative nature of the effects. This section considers the potential for the policies and proposals contained within the draft Local Plan to act in-combination both with each other and other plans and programmes to generate cumulative effects.

5.6.1 Cumulative Effects Arising From the Draft Local Plan

Table 5.4 presents the assessment of the cumulative (and synergistic) effects of the draft Local Plan policies. The cumulative effects of the draft Local Plan policies (as well as their interaction with other plans and programmes) are difficult to meaningfully or accurately assess. However, our best judgment indicates that all of the SA objectives will experience positive effects as a result of the implementation of the policies contained in the draft Local Plan. Significant positive effects are expected in respect of the following topic areas: housing; health; economy; equality and accessibility; transport; climate change; cultural heritage; and landscape. Effects on SA objectives related to education, biodiversity, land use, water, waste, air quality and flood risk, meanwhile, are likely to be positive.

Despite the overall positive cumulative effects identified above, some cumulative negative effects on the SA objectives are likely to arise as a result of the implementation of the draft Local Plan. The potential for negative effects has been identified in respect of SA objectives relating to climate change (principally due to increased greenhouse gas emissions associated with housing and economic growth), land use (due to the anticipated loss of greenfield land, including ‘best and versatile’ agricultural land) and air quality (due to increased emissions to air from vehicle movements).

There are also some aspects of the draft Local Plan where effects are more uncertain. These include biodiversity, water, waste, cultural heritage and landscape. This principally reflects the uncertainty surrounding the effects of development on these SA objectives that are in part unknown until detailed site development proposals come forward. However, the draft Local Plan includes policies which seek to manage impacts on these assets and in consequence, it is expected that significant adverse effects will be avoided.

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Table 5.4 Results of the Cumulative Effects Assessment

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Community Facilities	Education	Design and Place Making	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring		
1. Housing	++	++	+	++	++	++	0	+	0	+	+	0	0	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
2. Health	++	++	++	++	++	++	0	++	+	+	++	+	++	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective. Care must be taken to ensure delivery of facilities in the most appropriate places and the accessibility of urban extensions.
3. Education	+	+	+	0	0	++	0	+	0	0	0	0	+	+	+	It is anticipated that the policies of the draft Local Plan would have a positive effect on

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Community Facilities	Education	Design and Place Making	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	the achievement of the SA objective.
4. Economy	+	++	++	+	0	++	0	+	0	++	0	+	+	+	++		It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
5. Equality	++	++	++	++	++	+	0	++	+ / ?	+	+	0	+	+	++		It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
6. Transport	++	+	++	+	+	++	0	++	+	0	0	+	++	+	++		It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective. However, further development in key locations would generate more traffic which

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Community Facilities	Education	Design and Place Making	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	could lead to congestion, particularly within the urban area.
7. Climate Change	++	+	+/-	0/-	+	+	0	++	+	++	++	+	++	+/-	++/-		It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective. This reflects the policy intent of the draft Local Plan to reduce greenhouse gas emissions (including through locating development in accessible locations that reduce the need to travel, sustainable design, renewable energy generation and the promotion of alternative modes of travel to the car) but that fact that meeting development needs will result in increased greenhouse gas emissions as a result of increased vehicle movements, increased fuel

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Community Facilities	Education	Design and Place Making	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	consumptions and energy use in new dwellings and premises.
8. Biodiversity	++	+	?	0	+	+	0	++	+	0	+	++	0	+	+		It is anticipated that the policies of the draft Local Plan would have a positive effect on the achievement of the SA objective, although there is some uncertainty surrounding the effects of development on biodiversity which will be dependent to an extent on the nature of detailed proposals and the outcome of site specific investigation.
9. Land Use	+	+/-	+	+/-	+	+	0	++	+	0	++	+	+	+	+/-		It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on this SA objective. Whilst the policies within the Plan encourage the reuse of previously developed (brownfield) land, development will result in the loss of greenfield land, including 'best

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Community Facilities	Education	Design and Place Making	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	and versatile' agricultural land.
10. Water	+	+	0	0	0	?	0	+	0	+	++		0	+	+		It is anticipated that the policies of the draft Local Plan would have a positive effect on the achievement of the SA objective.
11. Waste	+	+	+	+	0	?	0	0	0	+	0	++	0	+	+		It is anticipated that the policies of the draft Local Plan would have a positive effect on the achievement of the SA objective.
12. Air Quality	+	+	-	-	+	+	0	++	0	+	++	+	++	+/-	+/-		It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on this SA objective. Whilst draft Local Plan policies will help to minimise air quality impacts arising from new development (including through locating development in accessible locations that reduce the need to travel, transport

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Community Facilities	Education	Design and Place Making	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	infrastructure improvements and the promotion of alternative modes of travel to the car), development would have negative effects on this objective resulting from the associated increase in vehicle use. This may be exacerbated in the City where some areas already have air quality issues.
13. Flood Risk	++	0/?	0	0	0	0	0	++	+	0	++	+	0	+	+		It is anticipated that the policies of the draft Local Plan would have a positive effect overall on the achievement of the SA objective.
14. Cultural Heritage	++	+	?	+	0	+	++	++	++	0	+	+	++	+	++		It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
15. Landscape	++	+	?	+	0	+	++	++	++	0/?	+	+	++	0	++		It is anticipated that the policies of the draft Local Plan would have a significant

SA Objective	Policy Chapters													Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Community Facilities	Education	Design and Place Making	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication			Delivery and Monitoring
																positive effect on the achievement of the SA objective.

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5.6.2 Cumulative Effects Arising From Other Plans and Programmes

The draft Local Plan policies sit within the context of a number of other plans and programmes including those of surrounding local districts and plans and programmes at the county level. These plans and programmes are identified at **Appendix C** and include, for example:

- Local Transport Plan for North Yorkshire;
- Selby Local Plan;
- Harrogate Local Plan;
- Ryedale Local Plan;
- East Riding Local Plan;
- Hambleton Local Plan;
- City of York Council Housing Strategy;
- Sustainable Community Strategy (Without Walls);
- Reaching Further: York's Economic Strategy; and
- Yorkshire Water Resources Management Plan.

The cumulative effects arising from the interaction of the draft Local Plan with other plans and programmes have been considered to ensure that significant cumulative effects on the City of York are considered. No significant negative cumulative effects have been identified, although increased development in York and neighbouring local authorities will be likely to generate adverse effects on SA objectives relating to:

- Transport, due to increased vehicle movements and associated congestion;
- Climate change, as a result of increased greenhouse gas emissions associated with new development;
- Air quality, principally due to increased vehicle movements and associated emissions to air;
- Land use, reflecting the cumulative loss of greenfield land; and
- Waste, due to an anticipated cumulative increase in waste arisings associated with new development.

However, effects in this regard could be minimised through the policy measures contained across a number of the emerging/adopted local plans. We also note that, in accordance with the duty to co-operate, there may be opportunities for authorities to collaborate in responding to these effects through the planning and development of further shared infrastructure and facilities.

6. Conclusions, Monitoring and Next Steps

6.1 Key Conclusions Emerging from the Appraisal

6.1.1 Spatial Strategy

The Local Plan will enable York to realise its economic growth ambitions as set out within the City's Economic Strategy. The quantum of housing to be accommodated in the City of York (a minimum annual provision of 995 new dwellings over the plan period (and 1,170 dwellings per annum during the first six years of the Local Plan) will meet the City's objectively assessed need for housing. The provision of sufficient employment land to accommodate over 13,500 new jobs will support sustainable economic growth and ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York and North Yorkshire Sub Region. The assessment contained in this report has highlighted that this is likely to have significant positive effects on, in particular, those SA objectives related housing, equality and the economy with minor positive effects also expected against education and health.

Development of this scale will, however, also have negative effects across a number of SA objectives. In particular, the scale of development to be accommodated in the City will result in the loss of greenfield land which has been assessed as significant. Other negative effects identified during the assessment relate to (inter-alia) increased resource use, waste generation and emissions to air. Significant levels of new development will also inevitably bring change to the character of the City, particularly where this is associated with strategic sites. Whilst this raises the potential for negative effects to occur in respect of SA objectives relating to cultural heritage and landscape, it is anticipated that these effects can be managed/reduced in accordance with the provisions of proposed draft Local Plan policies. Similarly, whilst development of greenfield land in particular may result in the potential loss or displacement of biodiversity assets, there is a significant opportunity to realise improvements to the City's green infrastructure network (including open space, biodiversity and geodiversity) through new provision, making links between existing resources and enhancing the management of resources, as well access enhancement generally. Importantly within the context of managing the effects of growth, the draft Local Plan also includes commitments on the City's Green Belt. This will help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the City and assist in preserving and enhancing the special character and setting of York.

The development of individual sites to meet future growth requirements may themselves have a range of positive and negative effects, depending on site size, location, existing character and the nature of proposed development. The selection of the sites proposed in the draft Local Plan reflect the application of criteria that have embodied the sustainable location principles contained in SS1 (and more broadly the requirements of the NPPF), and in consequence, are collectively considered to reflect the most sustainable way to meet future growth. Where potentially negative effects have been identified, the majority of these could be mitigated through the application of

draft Local Plan policies and at the individual planning application stage, when detailed design and mitigation measures will also be considered (such as site layout, design and access and the incorporation of ecological enhancement measures and Sustainable Drainage Systems (SuDS)).

6.1.2 Draft Local Plan Policies

The implementation of the proposed policies contained in the draft Local Plan is anticipated to have a cumulatively positive effect on the SA objectives. Significant positive effects are expected in respect of the following topic areas: housing; health; economy; equality and accessibility; transport; climate change; cultural heritage; and landscape. Effects on SA objectives related to education, biodiversity, land use, water, waste, air quality and flood risk, meanwhile, are also likely to be positive.

Notwithstanding, for those policies that promote/make provision for new development some negative effects on the SA objectives can be expected. In this context, the potential for negative effects has been identified in respect of SA objectives relating to climate change, land use and air quality. Where negative effects have been identified, mitigation measures have been proposed, which include the application of other policies within the plan concerning for example, biodiversity, air pollution, flood risk, sustainable design and heritage.

6.1.3 Key Recommendations and Proposed Mitigation Emerging from the Appraisal

The SA of the Local Plan is an ongoing and iterative process and the Council has sought to address recommendations arising from previous appraisal work in current draft Local Plan. The appraisal presented in this report has identified some areas where the performance of the draft Local Plan policies against the SA objectives could be enhanced. These are as follows:

- **There is potential to revise policy EC5** to include specific references to policies relating to placemaking and design to help ensure that tourism related development does not adversely impact on the historic environment of York.
- **It is recommended that WM1 be amended** to include a requirement to enhance the natural environment through new habitat creation/planting/greenspace or through biodiversity offsetting. In addition it is recommended that this policy reference flood risk as a consideration when determining planning applications for waste facilities.

Specific mitigation measures have been identified in relation to policies and proposed allocations. These are identified within the individual appraisal matrices.

6.1.4 Monitoring

It is a requirement of SA to establish how the significant sustainability effects of implementing the draft Local Plan will be monitored. However, as ODPM Guidance (ODPM, 2005) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects.

Monitoring the adopted Local Plan for sustainability effects can help to answer questions such as:

- Were the SA's predictions of sustainability effects accurate?
- Is the Local Plan contributing to the achievement of desired SA objectives?
- Are mitigation measures performing as well as expected?
- Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?

Monitoring should be focussed on:

- Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
- Significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
- Where there is the potential for effects to occur on sensitive environmental receptors.

Appendix K identifies a number of potential indicators that could be used for monitoring the sustainability impacts of the draft Local Plan. The indicators used originate from the following sources:

- CLG Core Indicators (used to inform the annual monitoring report)
- Local Indicators (monitored for the Local Plan AMR and within CYC departments)
- National Performance Indicators
- National Statistics

In addition, City of York Council produces an Annual Monitoring Report in April each year. This report contains both City-wide and local level data which could be used to monitor the effects against a number of SA objectives (including a number of those above).

6.1.5 Next Steps

Following analysis of the comments made on the Pre-Submission Local Plan and this SA Report and Habitat Regulations Assessment, the submission version of the Local Plan will be produced and submitted for Examination and subsequently adopted by the Council.

Sustainability Appraisal will continue to be iterative throughout the updating of the Local Plan. A full appraisal of the policy wording will be undertaken and included within the final SA report submitted alongside the Local Plan upon its next consultation and at the Submission stage. Where new alternatives have been generated between Preferred Options and Submission, these will also be appraised and reported.

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Appendix A

Quality Assurance Checklist

Appendix B

Schedule of Responses Received to the Local Plan Preferred Options SA Report

Appendix C

Review of Plans and Programmes

Appendix D

Baseline Analysis

Appendix E

Appraisal of Development Principles

Appendix F

Appraisal of Spatial Strategy Policies

Appendix G

Summary of Site Selection Methodology

Appendix H

Appraisal of Allocations and Alternatives

Appendix I

Appraisal of Strategic Sites and Alternatives

Appendix J

Appraisal of Thematic Local Plan Policies

Appendix K

Policy and Site Audit Trail

Appendix L

Possible Monitoring Indicators

