

Appendix 3

**York Northwest Area
Action Plan**

**DRAFT
SUSTAINABILITY
STATEMENT**

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City of York Council



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FORWARD

1. The purpose of Sustainability Appraisal is to promote Sustainable Development through the better integration of sustainability considerations into the preparation and adoption of plans.
2. The Sustainability Appraisal forms an integral part of the plan making process, and will be undertaken in stages alongside the production of each Local Development Document.
3. Section 39 of the Planning and Compulsory Purchase Act 2004 requires Local Development Documents to be prepared with a view to contributing to the achievement of Sustainable development.
4. The preparation of the Local Development Framework must also be in accordance with the European Union Directive 2001/42/EC (known as the Strategic Environmental Assessment, or SEA, Directive) which requires formal Strategic Environmental Assessment of certain plans and programmes which are likely to have significant effects on the environment. The directive has been incorporated into English Law by virtue of the Strategic Environmental Assessment Regulations 2004, and applies to all Local Development Documents where formal preparation began after 21st July 2004.
5. All Development Plan Documents and Supplementary Planning Documents will therefore be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). Although the requirement to undertake SA and SEA is distinct, it is possible to combine them into a single appraisal process. It should therefore be taken that references to the SA process also incorporate the requirements of the SEA Directive.
6. This sustainability statement considers the key sustainability issues arising from the York Northwest Area Action Plan (AAP) Issues and Options document produced for the Local Development Framework York Northwest Area Action Plan (AAP). It should be read in conjunction with the York Northwest AAP Issues and Options document.

1.0 INTRODUCTION

- 1.1 This document summarises the key sustainability matters arising from the Issues and Options document produced for the City of York Council Area Action Plan for York Northwest. It has been prepared by Nathaniel Lichfield and Partners on behalf of City of York Council as part of the sustainability appraisal process of the Local Development Framework (LDF).
- 1.2 Preparing a sustainability appraisal report at this stage is not a formal requirement of the sustainability appraisal process. This report is therefore only intended to provide a brief overview of the implications of the approach outlined in the Issues and Options document in relation to sustainable development. The main purpose of the report is to inform the next stages of preparation of the Area Action Plan. The matters raised in this report should be taken into account in moving forward with the preparation of the Area Action Plan and in particular the development of preferred options.
- 1.3 The Scoping Report for the Sustainability Appraisal of York Northwest (July 2007) has been used in producing the appraisal outlined in this report. The Scoping Report is available on the York Northwest web site:
www.york.gov.uk/environment/planning/major_developments/york_northwest
- 1.4 This report uses a definition of sustainable development, and what this means for the City of York, taken from the sustainability objectives developed for the Sustainability Appraisal for the York Northwest AAP, which are outlined in the Scoping Report. These are shown in table 1 below.

Table 1: Sustainability Objectives

| Sustainability Objectives | |
|--|--|
| Headline Objective | |
| H1. To reduce City of York's Ecological Footprint | |
| Environmental | |
| EN1 | Land use efficiency that maximises the use of brownfield land |
| EN2 | Maintain and improve a quality built environment and the cultural heritage of York and preserve the character and setting of the historic city of York |
| EN3 | Conserve and enhance a biodiverse, attractive and accessible natural environment |
| EN4 | Minimise greenhouse gas emissions and develop a managed response to the effects of climate change |

| | |
|-----------------|--|
| EN5 | Improve air quality in York |
| EN6 | The prudent and efficient use of energy, water, and other natural resources |
| EN7 | Reduce pollution and waste generation and increase levels of reuse and recycling |
| EN8 | Maintain and improve water quality |
| EN9 | Reduce the impact of flooding to people and property in York |
| Social | |
| S1 | Enhance access to York's urban and rural landscapes, public open space/recreational areas and leisure facilities for all |
| S2 | Maintain or reduce York's existing noise levels |
| S3 | Improve the health and well-being of the York population |
| S4 | Safety and security for people and property |
| S5 | Vibrant communities that participate in decision-making |
| S6 | Reduce the need to travel by private car |
| S7 | Developments which provide good access to and encourage use of public transport, walking and cycling |
| S8 | A transport network that integrates all modes for effective non car based movements |
| S9 | Quality affordable housing available for all |
| S10 | Social inclusion and equity across all sectors |
| Economic | |
| EC1 | Good quality employment opportunities available for all |
| EC2 | Good education and training opportunities for all which build skills and capacity of the population |
| EC3 | Conditions for business success, stable economic growth and investment |
| EC4 | Local food, health care, education/training needs and employment opportunities met locally |

- 1.5 Overall, the Issues and Options document contains a variety of policy approaches which should help ensure that new development at York Northwest is compatible with the objectives of greater sustainability.

2.0 VISION AND OBJECTIVES

- 2.1 A draft vision for the York Northwest Area Action Plan (AAP) is outlined in the Issues and Options document for comment. Additionally, suggested objectives for the AAP have been set out. Following consultation on the Issues and Options document a vision for the area will be defined and preferred objectives will be outlined.
- 2.2 The potential objectives for the York Northwest AAP are primarily adapted from those used in the 'Without Walls' Community Strategy for the York LDF area. This approach is compatible with the approach to LDF preparation advocated by Government, in that the LDF is a key tool in the delivery of the Community Strategy and therefore the LDF should support, and build on the objectives of the Community Strategy by taking forward the spatial implications of the objectives in particular.
- 2.3 Furthermore, the objectives have been formulated to be consistent with regional objectives, particularly those relating to the City of York and the proposed objectives of the Core Strategy (set out in the Core Strategy Issues and Options document).
- 2.4 The concept of sustainability and the creation of a sustainable and inclusive community are at the core of the York Northwest draft vision and suggested objectives and this approach is welcomed by the sustainability appraisal. The spatial planning objectives developed from the Community Strategy are generally compatible with the sustainability objectives developed for the sustainability appraisal. The effectiveness of these spatial objectives on the achievement of the sustainability objectives will not be apparent until they are implemented through the strategy, policies and proposals set out in the AAP.
- 2.5 The suggested objectives for York Northwest set out in the Issues and Options document appear quite comprehensive in their coverage of issues and complement, rather than conflict with, the sustainability appraisal objectives. However, the key sustainability appraisal objectives will need to be fully addressed in the York Northwest objectives. It is recommended, therefore, that the AAP objectives are revised and where necessary new objectives are added to ensure that the following issues are addressed:
- Maximising the use of brownfield land (SA Objective EN1);

- Conservation and enhancement of natural environment and biodiversity (SA objective EN3);
- Reducing waste generation and increase levels of reuse and recycling (SA objective EN7);
- Maintaining and improving water quality (SA objective EN8);
- Reducing the impact of flooding to people and property (SA objective EN9);
- Ensuring that ‘secure by design’ principles are applied to the design of all new developments (SA objective S4);
- Clearly setting out the need for quality **affordable** housing (SA objective S9) in Objectives 8 and 15; and
- Outlining in objective 5 that employment and training opportunities for **all** should be created (SA objective EC1 and EC2).

2.6 Furthermore, it is noted that two of the objectives contain the term ‘sustainable’. Care needs to be taken in using the term too frequently, as it is felt that this could devalue the term by allowing too great an interpretation of what it means in each circumstance. It is therefore recommended that at least one of the objectives is re-written to remove the word sustainable. Instead the objective should clearly define what is intended from the objective. This is already the case in the Without Walls vision points for the Community Strategy.

2.7 The vision and objectives alone will not have an impact on the future sustainability of the York Northwest area. Although the suggested objectives are compatible with achieving more sustainable development, an appropriate strategy and policies are needed to ensure these objectives can be reached and development is implemented appropriately.

3.0 'CREATING A SUSTAINABLE COMMUNITY'

- 3.1 Chapter 4 of the Issues and Options Report for the York Northwest AAP is entitled 'Creating a Sustainable Community'. The purpose of this Chapter is to set out the key issues that need to be considered and addressed, when identifying issues and formulating development options, in order to create a sustainable community at York Northwest. It draws on the principles set out in York's Local Agenda 21 document and the aims outlined in York's Without Walls Vision.
- 3.2 The key issues raised in this chapter clearly relate well to the SA objectives, particularly the headline objective of reducing York's 'ecological footprint' (Objective H1) and Objectives EN2, EN3, EN4, EN5, EN6, EN9, S1, S4, S6, S7, S9, EC1, EC2, and EC4. However, the key issues identified will only help to achieve a sustainable development, if they are at the heart of the options developed for the AAP.
- 3.3 It is recommended that in the next stage of the production process these key issues are explored further, with more detail being provided about issues such as sustainable travel modes, 'sustainable design', the use of on-site renewable energy technology and mitigation against the impacts of climate change. These objectives are highly compatible with sustainable development. In particular those issues relating to energy efficiency and a more careful consideration of resource consumption matters which relates clearly to the sustainability objectives and the goal of the City of York Council to reduce its 'ecological footprint'.
- 3.4 At the next stage of the production process options put forward should prioritise matters relating to sustainable construction, including creating more resource efficient buildings. The AAP should set out expectations for development in the area such as meeting defined sustainable construction standards such as those defined by Code for Sustainable Homes and BREEAM tools. It may also be suitable for the AAP to consider how buildings can be designed to take into account the effects of climate change and ensuring that the long-term future of buildings and their resource consumption are considered and designed into buildings.
- 3.5 The AAP should also seek to ensure that buildings are designed to accommodate the impacts of climate change, which York is and will be experiencing, such as an increase in storm events, and higher winter rainfall. This should include full consideration of flood risks and how buildings should be designed in areas that may

be at risk. Water efficiency technologies and systems to reduce run-off from buildings should also be an important consideration.

The Development of Key Land Uses at York Northwest

- 3.6 One of the primary objectives of the AAP is to identify the appropriate amount and mix of key land uses that should be developed within York Northwest and the transport structure required to serve these uses. Chapters 5 to 10 look in detail at the land uses and transport infrastructure that could be developed at York Northwest, exploring the key issues, ideas, opportunities and the potential options relating to each use. These topics are addressed in the remainder of this Sustainability Statement.

4.0 EMPLOYMENT

- 4.1 The first issue raised, in relation to employment uses, is the need for employment land. It has been identified that York has a key role to play in driving the region's economy, particularly through the knowledge led sectors. To help ensure that York fulfils its economic role, more employment land and quality office developments will be required to attract new businesses into the area. The location of employment land can have a substantial impact on establishing travel patterns in the area and reducing peoples' need to travel. As reducing the length and amount of trips people make to meet everyday needs is a key component of delivering more sustainable development.
- 4.2 Therefore, a key issue is that York Northwest should be used to meet some of the need for employment land and quality office developments in York. By helping to meet the need for employment land, this approach would also have the potential to assist in the achievement of the SA objective of creating conditions for business success, stable economic growth and investment (EC1). Furthermore, given the size of the site, its brownfield status and its location - adjacent to the city centre, the railway station and other employment uses, this approach has the potential to deliver a number of SA objectives including: S6, S7, EC2 and potentially EN1. The York Northwest development, due to the central location and close proximity to the railway station, shops and other services is likely to have positive benefits against a range of sustainability objectives, particularly by reducing the need to travel, and regenerating an area of central York and therefore bring improvements to the built environment.
- 4.3 Whilst it is recognised that York Northwest should meet some of the need for employment land in York, the Issues and Options document does not set out the exact amount of employment land to be provided at York Northwest. In this context, further evidence will be required to determine the amount of employment land to be provided at York Northwest. This evidence will be provided through the completion of the Employment Land Review and should be taken into account at the Preferred Options stage.
- 4.4 The second and third employment issues, raised in the Issues and Options document, relate to the location of employment uses and in particular office uses. In line with national guidance and sustainability objectives S6, S7, and EC4, it was noted that employment uses at York Northwest should be located in areas which are

easily accessible on foot, bicycle or public transport and where linked trips are possible. While this approach will help to deliver some of the SA objectives, it must be noted that depending on the employment use in question it also has the potential to conflict with others (e.g. EN1 and EN2). In recognition that different employment uses (e.g. B1, B2 and B8) have different locational requirements, options for the potential location of B1, B2, and B8 uses are presented later in the employment chapter.

4.5 Other issues discussed in the employment section include:

- the need for a good quality working environment both in terms of the interior of the employment use and the surrounding environment. In this context a Central Business District (CBD) with a mixture of uses is considered as a potential opportunity at York Northwest;
- the need for employment developments, which are exemplar of sustainable development in terms of their location, layout, design and construction;
- the potential to provide different types of employment uses within York Northwest;
- the need to create education and training opportunities alongside the development of employment uses; and
- the need to integrate different uses to ensure that some locations are used during the daytime, evening and night and there is the potential to do so within a CBD.

4.6 The implementation of the issues noted above has the potential to meet the following SA objectives: EN6, S1, EC1, EC2, EC3 and EC4.

4.7 It was deemed inappropriate to provide options relating to the amount of employment land to be provided until the Employment Land Study for York is finalised. However options were provided in relation to the distribution of different types of employment uses. These options are not mutually exclusive and therefore a combination of options could be brought forward at the preferred options stage.

4.8 The first option (E1) is for B1 uses to be located at York Central. In sustainability terms the key advantages of this option are that a large workforce could be located close to a major public transport hub (York Railway Station) and within walking distance of the City Centre; car parking for the employment uses could be shared with nearby tourism uses; it will be an attractive location for businesses who want to be located close to the City Centre and a major transport network; and should a CBD be created, employees would have easy access to local retail, services, restaurants and public space. This option would therefore meet the following SA objectives: S6, S7,

EC3, EC4, and S1. While this option clearly has the potential to be sustainable, there is a risk that traffic congestion could increase in the City Centre if employees cannot be encouraged to travel to work by means other than the private car (e.g. parking spaces could be restricted). This increase in congestion would conflict with the SA objectives of improving air quality in York (EN5), reducing York's existing noise levels (S2) and minimising greenhouse gases (EN4).

4.9 Options E2 (locating B2 uses at York Central) and E3 (locating B8 uses at York Central) are similar in terms of their sustainability. Like Option E1 they both have the potential to meet SA objectives S6, S7 and EC3 due to the potential workforce being located next to sustainable transport modes; the attractiveness of the location for businesses who want to be located close to the City Centre and a major transport network; and the opportunity to exploit existing rail freight infrastructure. However, these options also raise a number of sustainability issues including:

- B2 and B8 uses are more likely to have a detrimental impact on the appearance of the area and City Centre than other uses. In particular such uses may adversely impact the views of the Minster. These options would therefore conflict with SA objective EN2;
- It will be more difficult to integrate B2 and B8 uses with other uses in the form of a mixed use development;
- B2 and B8 uses at York Central could lead to an unacceptable increase in HGVs and cars in the City Centre, which would exacerbate traffic congestion and air pollution problems, conflicting with SA objectives EN4, EN5 and S2; and
- B2 and B8 uses require a high level of land take in relation to the number of jobs they create and therefore such uses would not maximise the use of a brownfield site, conflicting with SA objective EN1.

4.10 Option E4 suggests locating B1 uses on the British Sugar site. In sustainability terms, the site is close to residential areas and could therefore be accessed by the surrounding community on foot or by public transport, meeting SA objectives S6, S7 and S8. Other potential sustainability benefits of this option are dependent on whether a District/or Local Centre and rail halt are developed at British Sugar. Should these uses be implemented B1 uses at British Sugar would be more accessible, linked trips and shared parking would be encouraged and this option would therefore have the

potential to meet the additional SA objectives S1 and EC4. This option may however, increase noise and traffic movements in the residential area surrounding British Sugar; be less attractive for businesses wanting to locate close to the City Centre and depending on the scale and design of the buildings have a detrimental impact on the appearance of the area. It may therefore also conflict with SA objectives EN5 and S2.

4.11 Option E5 and E6 suggest locating B2 and B8 uses respectively on the British Sugar site. Like Options E2 and E3 they share similar sustainability issues. The key sustainability benefits of these options are that:

- the workforce could be located in close proximity and have the potential to access the uses on foot, bicycle and by public transport;
- there is potential to use the Freight Avoidance Line to distribute goods, rather than transport all goods by HGVs;
- in relation to B8 uses there is potential to create a sustainable distribution centre, where freight is transferred onto small vehicles for the final stage of its journey into the city centre; and
- there is potential to replace jobs lost at British Sugar with similar jobs.

4.12 As can be seen, these benefits mainly relate to SA objective S6, S7, EC1 and EN5. Like the other options set out above, Options E5 and E6 also have the potential to conflict with SA objectives, including EN1 due to the fact these uses would not maximise the use of brownfield land and S2 due to the potential for HGVs to increase the noise levels around the site.

5.0 HOUSING

5.1 Future housing supply and need is the first issue raised in the housing chapter. The AAP suggests that land should be allocated in York Northwest to accommodate housing and to help meet a significant proportion of York's housing requirement. In principle this approach is sustainable as it will reduce the need for housing to be developed on greenfield land, provide housing close to existing and potential employment uses, shops and services and key public transport hubs. Indeed the provision of housing developments at York Northwest would primarily meet SA Objectives EN1, S1, EC4, S6, and S7.

5.2 Other issues, ideas and opportunities raised include:

- the need to provide the appropriate balance of uses within York Northwest;
- the need to maximise the numbers of affordable housing within the area, while ensuring that a range of housing type and tenure (e.g. social rent and discounted sale) is provided. In particular, the need to provide affordable family housing is highlighted;
- the need to provide a range of housing types and sizes to meet the overall requirements of the city. Options relating to the mix of housing are set out later in the housing chapter; and
- balancing the need to provide a range of housing densities across the site with the need to maximise the use of brownfield land close to the city centre. Options are also provided in relation to housing density.

5.3 Implementing these opportunities has the potential to meet SA objectives relating to the provision of food, health care, education and employment opportunities locally (EC4), providing quality affordable housing for all (S9), encouraging social inclusion and equity by providing a mix of housing types (S10) and maximising the use of brownfield land (EN1).

5.4 The achievement of these SA objectives, however, is not guaranteed and there is a potential for conflicts between the SA objectives. Objective EN9 needs to be carefully considered to ensure that flooding issues are taken into account when allocating land at York Northwest. Other issues also include the need to ensure that the design of

housing enhances the setting of the city, is energy efficient and creates a safe and secure community; the need to encourage on-site renewable energy generation; and the need to successfully deliver the remediation of contaminated parts of the site.

- 5.5 As noted above, options have been provided in relation to housing density and housing type. It was deemed inappropriate to provide options relating to the amount of housing land until the Employment Land Review for York is finalised because this has implications for the amount of land available for housing.
- 5.6 Option H1 seeks to provide high density housing closer to the centre at York Central and medium density housing at the fringe of the site at British Sugar. On the whole this option is in line with the sustainability agenda. Provision of high density housing, close to the city centre, a major public transport node (York Railway Station), and existing services, employment uses and retail uses (SA objective EC4), is an efficient use of brownfield land (SA objectives EN1), which should reduce the need to travel by private car (SA objectives S6 and S7). The provision of high and medium density housing will help meet a range of needs (SA objective S10) and has the potential to create a vibrant mixed community (SA objective S5).
- 5.7 While there are a number of sustainability benefits of this option there are potential sustainability conflicts. For example high density housing at York Northwest may increase traffic congestion in this area and worsen air pollution. Furthermore, to create high density dwellings it may be necessary to have relatively taller buildings which could have detrimental impact on views of listed buildings and the character and setting of the area. It will be necessary at the preferred options stage to prioritise objectives and to identify ways to reduce conflicts with SA objectives.
- 5.8 Option H2 suggests that higher density housing should be provided close to public transport interchanges (at central station and potential new rail halt at British Sugar), with medium density housing further away from main public transport facilities. This option is in line with Government planning guidance and a range of SA objectives. The key benefits of this approach are that a high number of residents will be located close to public transport nodes and existing and proposed services and a mixture of housing can be provided at the site. Like option H1, this option therefore has the potential to help deliver SA objectives EN1, EC4, S5, S6, S7 and S10. Similarly the same conflicts between SA objectives, identified for Option H1, apply to Option H2. A further potential sustainability conflict arising from Option H2 is that by providing housing at the current and proposed public transport hubs it restricts what other kinds

of development can be built there. It could be argued that other uses, such as employment uses and retail, have the potential to generate more traffic than housing and should therefore be located at the station in order to ensure that the most significant reduction in car trips can be achieved, in line with SA objective S6.

- 5.9 Options H3, H4 and H5 relate to the mix of house types that should be provided at York Northwest. The sustainability implications of these options are more difficult to quantify.
- 5.10 The draft HMA suggests that the housing requirement in York is for around 64% houses, 36% apartments. Option H3 suggests that the proportion of houses and apartments at York Northwest should be in line with the findings of the HMA. Clearly the benefit of this approach is that it will meet the identified need for houses and apartments, which in turn will help to deliver SA objective S10.
- 5.11 In relation to Option H4 (greater percentage of houses than suggested in the HMA), the implementation of this approach could raise two significant sustainability issues. The first issue is that a higher proportion of housing is likely to reduce the housing density and overall number of dwellings provided at York Northwest. This approach will therefore reduce York Northwest's contribution to meeting York's housing need. It will also be a less efficient use of a brownfield site, which conflicts with SA objective EN1. The second issue is that the provision of fewer apartments may impact adversely on the scheme's viability given the major infrastructure costs. This in turn may lead to the provision of fewer affordable dwellings, in conflict with SA objective S9, and lower contributions towards the provision of open space and community facilities.
- 5.12 Option H5, seeks to provide a greater percentage of apartments than set out in the HMA. This approach would have four key benefits: the more efficient use of brownfield land; a greater opportunity to create mixed use developments with commercial uses on the ground floor and apartments on the upper floor; and the generation of higher land values allowing for greater cross-subsidy of non-commercial uses and for the provision of affordable housing. It will, however, also have the potential to conflict with SA objectives. For example a higher proportion of apartments within the area could be out of character with the scale of adjoining development. Furthermore, the provision of more apartments will increase the number of individuals living close to the City Centre, which in turn could increase traffic congestion in the City Centre.

5.13 In summary Option H5 will help meet SA objectives EN1, EC4 and S1, but has the potential to conflict with SA objectives EN2 and EN5.

6.0 SOCIAL INFRASTRUCTURE

6.1 The introduction to the Social Infrastructure chapter makes it clear that the provision of retail, community, health and education facilities at York Northwest will be necessary to cater for the needs of future residents and employees. This approach is clearly sustainable as it ensures that the York Northwest population will have access to local health care, education and convenience goods facilities, in line with Government guidance and SA objective EC4.

6.2 Having established that retail, community, health and education facilities will need to be provided at York Northwest the following key issues have been raised:

- the need for these facilities to be accessible to all residents and employees in York Northwest, ideally within walking/cycling distance of these users. It is identified that to maximise the accessibility of these facilities they should be located close to public transport hubs and ideally integrated with other compatible land uses;
- there is limited existing convenience goods provision within and adjacent to York Northwest. The AAP should identify the scale, nature and location of the facilities to be provided. These facilities should not increase traffic congestion in the area or have a detrimental impact on the vitality and viability of surrounding centres. Instead facilities should reduce the needs of residents within York Northwest and the surrounding area to travel to shopping facilities elsewhere;
- the potential to create a Central Business District (CBD) adjacent to the station, which provides a mixture of retail facilities, services and restaurants alongside employment uses and public open space;
- there is limited provision of community facilities within and adjacent to York Northwest. New community facilities should be provided to cater for the needs of the new population. These facilities should where possible share open space and buildings with other uses to maximise the use of brownfield land;
- there is limited provision of health care facilities within and adjacent to York Northwest. These facilities should be located close to community, education and retail facilities in order to facilitate multi-purpose trips;

- due to the scale of development likely to take place at York Northwest it is likely that there will be a requirement for new primary schools within York Northwest. The scale, number and location of these will depend on the scale, density and location of new residential developments within York Northwest. However, all children should be able to walk or cycle safely to school;
- there is a need to strike a balance between providing primary schools within easy walking and cycling distance of pupils and maximising the use of resources (e.g. shared sports field), through the provision of large primary schools;
- once housing numbers for York Northwest have been determined it will be necessary to assess whether children within York Northwest will be accommodated in existing, but expanded, secondary schools or whether a new school will be required. This assessment needs to take into account the city-wide situation; and
- given the size of York North West, the comprehensive development of the site will take a number of years to complete. A phased approach to the provision of education facilities to ensure that as the development grows, sufficient school places are provided.

6.3 Should these issues be addressed appropriately through future AAP policies, the provision of social infrastructure at York Northwest should help to deliver a number of SA objectives including EN1, EN5, EC1, EC2, EC4, S3, S6, and S7. The only potential sustainability conflict would arise from providing shopping facilities at a scale which has a detrimental impact on existing shopping facilities within the City Centre or other district and local centres and which generates high levels of traffic, exacerbating traffic congestion in the City Centre. On this basis it is recommended that the results of the City of York Retail Study, currently being prepared, are used to establish the scale of retail facilities required at York Northwest.

6.4 Options in relation to the amount of land that should be allocated for social infrastructure have not been provided in the AAP Issues and Options document. This approach is acceptable, given that the scale of the provision required to create a sustainable community will not be known until the amount of employment land and housing land required has been decided. However, options are provided in relation to the distribution of Community and Social Facilities.

- 6.5 Options S1 and S2 relate to the provision of one new District Centre on either the British Sugar or York Central sites respectively, together with the provision of smaller facilities on the other site. Option S3 seeks to provide two local centres (one on York Central and the other on British Sugar).
- 6.6 On the whole, the sustainability issues arising from these options are the same. In terms of sustainability benefits all of the options would help to meet retail, service and community needs locally (i.e. SA objective EC4) and encourage linked trips, which in turn would reduce the need to travel by private car (i.e. SA objective S6). Furthermore, the District and/or Local Centres would act as a community heart or focus, which could help to create a vibrant community, in line with SA objective S5.
- 6.7 As outlined above in relation to the provision of shopping facilities, a potential conflict with sustainability objectives could arise if the level of retail floorspace within the new District Centre is too high, to the extent that it competes with existing centres and generates significant traffic. Furthermore, in relation to Option S3 it is possible that the scale of provision that would exist within a local centre would not cater for the main shopping/service needs of the York Northwest population and therefore residents would continue to travel outside the area for their main food shopping. This option would therefore not significantly reduce the need to travel by car.
- 6.8 Option S4 is for the provision of a range of small scale shopping social, community, and health facilities in a number of small clusters across York Northwest. While this option would clearly encourage people to travel on foot or by bicycle to meet their retail and community needs, there are a number of sustainability conflicts arising from this option. These conflicts include that the scale of the facilities would require residents to travel outside the area for their main food shopping, the scattering of facilities would limit the potential for linked trips and it would be more difficult to promote shared parking. Option S4 is therefore likely to conflict with SA objective S6.
- 6.9 Finally Option S5 is for the provision of comparison goods retailing at the station. The sustainability of this option depends on the future need for comparison goods floorspace in York City Centre and the capacity for the City Centre to accommodate this need. In this context, a new Retail Study for the City of York is currently being undertaken and this will assess the need for further retail floorspace in the city centre and identify the best opportunities for meeting this need.

6.10 If the future need cannot be accommodated in the City Centre then the provision of comparison goods retailing at the station could have a number of sustainability benefits. The site is close enough to the City Centre to encourage some linked trips and is obviously easily accessible by public transport (i.e. SA objective S6 and S7). Furthermore, there is potential to develop retail uses that link to the tourism industry and the National Railway Museum thereby developing a new sector in York's economy (SA objective EC4). However, potential issues include the impact on the vitality and viability of the primary shopping frontage within the City and the creation of new retailing facilities at the station could increase vehicular movement into the centre of York. This would conflict with SA Objectives EN5 and EC3.

7.0 TRANSPORT AND ACCESSIBILITY

- 7.1 A number of issues, ideas and opportunities have been identified in the Transport and Accessibility Chapter. The overarching issue highlighted is that the promotion of the most sustainable means of travel will be key to the success of the development. The Traffic and Transport Strategy for York Northwest will need to ensure that opportunities for walking, cycling and the most sustainable forms of public transport, are maximized in order to limit the need for people to travel by car. This aim complements the SA objectives S6, S7 and S8. It is noted that the proximity of York Northwest to York Station and the rail network should be capitalised on to ensure that the development is highly accessible, particularly by sustainable modes of transport. The emphasis on the provision of sustainable forms of public transport, eg mass transit using sustainable energy sources, will complement SA objective EN5. Providing a 'connected' development in terms of public transport accessibility is one of the key ways in which it can have a positive impact on achieving more sustainable development. It is vital that public transport accessibility, walking and cycling is taken into account from the outset so that it is a fundamental component of the scheme.
- 7.2 Traffic congestion and air quality are inter-related and it is recognised that by reducing vehicle numbers and traffic congestion the quality of the air in York will improve. In this context, the use of the rail corridor and station must be maximised, new access points in congested parts of the City Centre should not be open to all vehicular traffic, and car sharing and park and rides schemes should be encouraged. These measures if implemented will help to create a sustainable development at York Northwest. In particular they will meet SA objectives EN5, S6 and S7.
- 7.3 Another key issue highlighted is access into the site for all modes of transport is limited. New accesses are required in locations where the increased traffic flow and infrastructure required will not have a significant adverse impact on the surrounding area. This issue has the potential to conflict with SA objectives. In particular new access options have the potential to exacerbate existing traffic congestion and air quality hence conflicting with SA Objective EN5. Options for potential access points for vehicular and cycle access are set out later in the Chapter.
- 7.4 Access for pedestrian and cyclists is also very poor at the present time and the Issues and Options document identifies the opportunity to provide new safe and attractive access points for pedestrians and cyclists to reduce the need to travel by car and

hence assist in achieving SA Objectives S6, S7. Improving opportunities for walking and cycling would also assist in achieving SA Objective S3 to improve the health and well being of the York Northwest population.

- 7.5 The importance of developing opportunities to travel to and from York Northwest by public transport is highlighted in the Issues and Options document as being essential if the Council's commitment to reduce travel by private car is to be achieved (SA Objectives S6 and S7). The Issues and Options document also identifies the potential to create a new public transport interchange adjacent to the central railway station to help improve connectivity within the City. It also indicates that there may be potential for the creation of a rail halt (tram/train) and/or local public transport interchange within the British Sugar site, potentially linking to park and ride sites on the A59. These measures would assist in delivering SA Objectives S6, S7 S8 and EN5.
- 7.6 In addition to the issue of access into and out of York Northwest the Issues and Options document identifies the need to ensure that the internal transport network is planned in such a way as to prevent the creation of 'rat runs' into and out of the City Centre. If this is not carefully managed then there is potential for new though routes to be formed which could have a negative impact upon the surrounding transport network and the environment and desirability of York Northwest in conflict with SA Objectives EN4, EN5, S6, S7 and S8.
- 7.7 The issue of car parking is explored in the Issues and Options document as it is evident that alongside a good public transport network, the amount and distribution of car parking within York Northwest will need to be limited to deter residents, employees and visitors from using their cars to access and move around the area and thus assist in achieving SA Objectives S6 and EN5. The use of measures such as shared parking, park and ride and maximum parking standards below those in force elsewhere in the City Centre and car free/low car dependency development are raised as ideas and opportunities in order to try and ensure that these SA Objectives are achieved.
- 7.8 Due to the character and layout of York's historic City Centre and the existing problems with congestion and air quality the Issues and Options document explores the issue of freight movements and the opportunity to identify a consolidation centre near the outer ring road to facilitate the transfer of goods from heavy goods vehicles to smaller vehicles for City Centre access. This could be achieved by the

development of a consolidation centre within the former British Sugar site and hence assist in meeting SA Objectives EN2 and EN5.

- 7.9 Following on from the identification of these key issues the Issues and Options paper provides options in relation to vehicular access points, public transport and pedestrian and cycle access.
- 7.10 Options T1-T14 relate to potential new vehicular access points. Whilst in theory most of the options could be implemented together, in reality not all are likely to be needed to serve new development at York Northwest. At this stage in the process it would only be possible to consider the extent to which each option in isolation could either assist with or conflict with the SA Objectives and this is not considered to be a useful exercise since the access points will not be developed in isolation. However it will be important at the next stage of the AAP process to assess the overall sustainability of the traffic and transport framework, including the chosen package of access points as this is more important and relevant than their merits when considered in isolation. Each of the fourteen options has the potential to conflict with SA Objective S6 as creating new vehicular access points will increase the opportunity for people to access York Northwest by means of the private car. However if the use of some of these access points was restricted to public transport use only (as indicated in some of the options) then they have the potential to provide a sustainable means of accessing the site which helps assist with SA Objectives EN2, EN5, S6, S7 and S8.
- 7.11 At this stage in the process it is evident that some of the options raise greater environmental concerns than others. Option T1 (Water End) for example could lead to the loss of land or considerable disturbance to Millennium Green which is a valuable open space well used by the community. Option T13 (Allotments) would also result in the loss of a valuable facility which could be difficult to replace elsewhere. These options would therefore appear to conflict with SA Objectives EN2, EN3, S1 and S3. Option T3 (Queen Street) could conflict with both SA Objectives EN2 and EN5 as a result of its location within an area with existing air quality problems and its proximity to important listed buildings and other historic buildings.
- 7.12 Options T15-T20 relate to public transport developments. T15 involves the development of a tram/train service along the York-Leeds-Harrogate rail line. This would assist with SA Objective EN2 by making use of existing infrastructure and hence allowing sustainable transport without the need for the provision of new roads and rail links which could affect the setting and character of the historic city. The

tram/train would also assist with achieving SA Objective EN5, S6, S7 and S8. It could also be attractive to inward investors and hence assist with SA Objective EC3.

- 7.13 Options T16-T20 relate to the identification of sites for new transport interchanges as this was recognised as crucial to the achievement of a sustainable transport network and hence to the achievement of SA Objectives S6 and S8. This however needs to be balanced against any conflict with SA Objective EN2 which could arise as a result of the location of the potential interchange points adjacent to the listed railway station and city walls.
- 7.14 The final options in this section (T21-T34) relate to dedicated pedestrian and cycle routes, some of which are similar to those identified as having the potential to provide vehicular access points. All these options could help achieve SA Objectives EN5, S3, S6, S7 and EC3 by providing attractive, safe alternatives to the private car which allow residents, employees and visitors to gain access to and within York Northwest on foot or bicycle. In particular options T23 (York Business Park) and T24 (Holgate Business Park) offer the opportunity to assist with the achievement of SA Objective EC1 by creating good linkages between existing employment sites and the potential new residential community at York Northwest.

8.0 CULTURE AND TOURISM

- 8.1 This section of the Issues and Options document emphasises the important influences of culture and tourism on the built environment in York and the significant benefits they bring to the local economy. York has a strong existing tourist role and York Northwest offers the opportunity to build upon this role through the provision of further cultural facilities. The York Tourism Strategy identifies a need to promote York as an exemplar for sustainable tourism, enhance the existing attractions and seek new attractions and hotel accommodation.
- 8.2 One of the key issues raised in the Issues and Options document is the need to encourage growth in tourism and the opportunity exists to build upon the success of the National Railway Museum which is located within York Northwest. Appropriate and well planned development has the potential to assist with economic objectives such as encouraging more visitors to stay in the City in accordance with SA Objectives EN2 and EC3. However a growth in visitors potentially means a growth in vehicle numbers and this may lead to conflicts with SA Objectives EN4, EN5 and S6 unless measures are put in place to encourage visitors to travel to the city by public transport.
- 8.3 As well as an increase in the number of tourists visiting the city there is a desire to increase the length of time they stay in the city and the amount they spend during their stay. Day visitors put more pressure on infrastructure resulting in congestion and air pollution contrary to SA Objectives EN4, EN5 and S6. The provision of new hotels, cafes, restaurants and other cultural facilities could help meet sustainability objectives relating to the cultural heritage (SA Objective EN2) and encouraging visitors to stay longer will improve conditions for business success and encourage economic growth (SA Objective EC3). Measures need to be put in place to encourage longer stay visitors to use public transport during their stay within the city and an efficient network of pedestrian and cycle routes will assist with this in accordance with SA objectives S6 and S7.
- 8.4 The development of a 'cultural quarter' has been proposed in the Core Strategy and York Northwest has an important role to play in its success due to its location immediately adjacent to the railway station and the existence of the NRM which is already a major tourist attraction. As part of the development of the cultural quarter the Issues and Options document identifies the opportunity to improve linkages

between York Northwest and the existing historic centre. This would assist with the achievement of SA Objective S7 by enabling visitors to walk safely between these areas.

- 8.5 If the tourism potential of York Northwest is to be maximised it will be important that a high quality public realm including a number of attractive public spaces is created. This has the potential to enhance the setting of the existing listed buildings including the railway station in accordance with SA Objectives EN2 and S1 and to improve the perception of York as a high quality environment for businesses to locate in accordance with SA Objective EC3.
- 8.6 Whilst York Northwest is a new development it will be important to give due regard to the historic environment adjacent to the site as this is one of the keys to the success of York both as a tourist destination and as a place to live and work. It will be crucial that SA Objective EN2 is achieved in order to ensure that the quality built environment and cultural heritage are maintained and improved.
- 8.7 Options C1 and C2 relate to the possible locations for the development of a cultural area in York Northwest. Option C1 refers to a cultural area being centred around the National Railway Museum. This has sustainability benefits as it is within easy walking distance of other attractions in the City Centre and is located close to the railway station and hence offers the opportunity for visitors to arrive by public transport. It also offers the opportunity to enhance this important gateway to the City. This option therefore would assist with SA objectives S6, S7 and EN2. Option C2 suggests that in addition to developing cultural facilities adjacent to the NRM there is potential for the provision of new facilities around other key transport nodes within York Northwest, namely the proposed new rail halt (tram/train) at British Sugar. Since this area is detached from the other tourist facilities in the City there is less opportunity for linked trips and unless significant public transport improvements were put in place there is a danger of encouraging private car usage in conflict with SA Objective S6.
- 8.8 Options C3 and C4 relate to the provision of a high quality hotel (4 or 5 star) which has been identified as important in order to improve tourism and encourage people to visit and stay longer in the area, helping to meet economic objectives. This should help achieve higher economic returns (SA Objective EC3) without putting extra pressure on existing tourism destinations in and around the city. Option C3 suggests that York Central could accommodate a new high quality hotel. This location addresses SA Objective S7 as it is within easy walking distance of the City Centre so

that visitors are able to access all facilities on foot. However it would also encourage an increase in the number of visitors entering the city centre by car (contrary to SA Objective S6) as it is likely that some guests would travel to the hotel by car. Option C4 would also be likely to result in guests travelling to the hotel by car (contrary to SA Objective S6) and unlike option C3 it is probable that many guests would use their cars on a daily basis to travel from the hotel into the city centre. In this respect Option C3 (York Central) is likely to be a more sustainable option for a hotel than C4.

- 8.9 The final option considered in this section is the development of a new pedestrian and cycle bridge link from York Northwest across the river to the City Centre. This could improve movement around the cultural facilities and hence improve residents' and visitors' experiences of the historic city in accordance with SA Objectives EN2, S1 and S7. There would be some loss of open space on the northern bank of the river associated with the construction of a bridge and this might result in a conflict with SA Objective EN3, however the sustainability and tourism benefits of a new pedestrian link would likely offset the loss of a small area of open space.

9.0 OPEN SPACE AND BUILT SPORTING FACILITIES

- 9.1 The provision of attractive open space and recreational spaces and sporting facilities are fundamental to the creation of sustainable settlements and the promotion of health and well being. This is particularly important in York Northwest where a new community will be created. The opportunity exists to make sure that all residents have easy and convenient access to these facilities. By careful planning it will be possible to achieve SA Objectives EN3, S1, S3, S6 and S7.
- 9.2 Existing open space is severely limited within York Northwest, comprising Millennium Green, the sports ground and a small area of conservation value within the British Sugar site. There is currently no public access to the open space within British Sugar, however, Millennium Green is a valuable local resource and in accordance with SA Objective S1 it will need to be protected or replaced as part of the development of York Northwest. The amount of new open space which will need to be provided will be dependent upon the amount of residential and employment development which is eventually brought forward on the site however in order to secure compliance with SA Objectives S1, S3 and S7 it will be important to take into account the findings of the Open Space, Sport and Recreation Study and the Open Space, Sport and Recreation Study for York Northwest.
- 9.3 In terms of sporting facilities, provision within York Northwest is also very limited. There is a small children's playground at Carlisle Street, the York Railway Institute and a sports field and club within British Sugar. It is possible that the Railway Institute facilities may need to be relocated to enable a new access point to be created to York Northwest. These facilities are all well used and hence will need to be replaced as part of the York Northwest development within easy access from the City Centre. The opportunity exists through this replacement and new provision to address SA Objectives S1, S3 and EC4.
- 9.4 In considering the location of new open space and sports facilities it will be important to maximise the use of facilities by the whole of the York Northwest community and to ensure that all sectors of the community are provided for. Scope also exists for new provision within York Northwest to help offset deficiencies in provision for the surrounding areas in accordance with SA Objective S1.

- 9.5 In addition to local sports facilities a need has been identified for a professional sports stadium to accommodate York City Football Club and the York City Knights. A range of possible locations have been identified to accommodate this facility including York Northwest. The Issues and Options Paper identifies three possible locations within York Northwest for a stadium: adjacent to the railway station; at the northern end of British Sugar; and linked to a new district centre and rail halt within British Sugar. All these options could assist in the achievement of SA Objectives S1 and S3 however in sustainability terms there are problems with all these options.
- 9.6 Whilst Option O1 (adjacent to railway station) has the potential to encourage visitors to travel by public transport in accordance with SA Objective S6 it conflicts with SA Objective EN1 in that it takes up centrally located brownfield land which might better be used for a new commercial area to provide office and/or residential accommodation. It is located close to an area with air quality and congestion problems and large numbers of visitors arriving by car would be contrary to SA Objectives EN4 and EN5. The close proximity of this site to the historic core and listed railway station also offers the potential for conflict with SA Objective EN2.
- 9.7 Option O2 (northern end of British Sugar) has the benefit of avoiding the need for visitors to enter the City Centre and hence should not have any conflicts with SA Objectives EN2 and EN5. However this part of the York Northwest site is currently poorly served by public transport and even with a new rail halt and public transport linkages this option could conflict with SA Objective S6 by encouraging travel by private car.
- 9.8 The final option for the stadium (O3) is to be linked to a possible new District Centre on the British Sugar site. This offers the opportunity for shared facilities, such as cafes and retail which would maximise the efficient use of land in accordance with SA Objective EN1. However it could also create traffic congestion within a new District centre and may discourage the use of the centre by local residents on match days in conflict with SA Objective S4. It may also have a detrimental impact on the vitality and viability of existing local centres such as Acomb District Centre and surrounding local shops.

10.0 URBAN DESIGN

- 10.1 The importance of good design cannot be underestimated as it ensures attractive, usable, durable and adaptable places which together assist in achieving sustainable development. In York Northwest it is considered important to apply design principles which will result in a community which is well mixed, has well planned public spaces, is safe and accessible, supports the effective use of resources, addresses the needs of all members of society and which functions well and adds to the overall character and quality of the area. These objectives are highly compatible with sustainable development. In particular those issues relating to energy efficiency and more careful consideration of resource consumption matters, relate well to sustainability objectives and the goal of the City of York Council to reduce its ecological footprint. With the appropriate design principles in place it should be possible to secure compliance with SA Objectives H1, EN1, EN2, EN6, EN7, S1, S4, S5, S10 and EC4.
- 10.2 The first design issue which requires consideration is that of the historic context. Part of York Northwest falls within the Central Conservation Area and the area contains a range of important listed buildings. There is a need for new development to draw on the qualities of the historic environment but without trying to mimic them and to encourage high quality contemporary architecture and design which complements the historic fabric. If this is done successfully then it will be possible to maintain and improve the built environment in accordance with SA Objective EN2.
- 10.3 The Issues and Options document explains that sustainable design and construction techniques should also be encouraged within York Northwest. Development should minimise the use of non renewable resources during construction and minimise carbon and energy emissions. Furthermore, where possible development should meet defined sustainable construction methods such as those defined by the Code for Sustainable Homes and BREEAM tools. In this regard it should be possible to secure compliance with SA Objectives EN6 and EN7.
- 10.4 In terms of the built environment and public realm, the prominent location of York Northwest means that it will be important to ensure that all development on the site is of the highest possible quality. This includes the spaces between buildings as well as the buildings themselves. Consideration needs to be given to the framework of routes and spaces that connect locally and more widely and the way developments, routes and open spaces relate to one another. This will encourage people to walk between

developments in accordance with SA Objective S6 rather than using their cars. Creating an attractive public realm will also assist with improving the built environment and enhancing access to open spaces in accordance with SA Objectives EN2 and S1. The careful layout of buildings and design of public spaces to take into account the microclimate, including daylight, sunlight, wind and temperature, will assist in minimising the use of natural resources and hence accord with SA Objective EN6.

- 10.5 Finally the character and appearance of the landscape within York Northwest needs careful consideration to ensure that its design reflects the principles of sustainable development. Opportunities need to be explored to maximise the conservation value of existing features, waterways and ponds within the site in accordance with SA Objective EN3. In particular there is a need to have regard to the presence of ecologically sensitive species such as the mining bees within the British Sugar site to ensure that the requirements of SA Objective EN3 are fully met. By providing an attractive and well designed landscape it should be possible to create an attractive new community which will assist with the achievement of SA Objectives EN2, EN3, S1, S3 and EC3.

11.0 CONCLUSION

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

12.0 WHAT HAPPENS NEXT?

12.1 The Sustainability Appraisal (SA) process is one which gradually builds up the information and assessment process resulting in the preparation of a Final Report. The Final report will set out the baseline position and sustainability framework, assess the main issues and options and ultimately the preferred option. The main stages of the SA process run alongside the main stages in preparing a development plan document and are summarised below:

| Stage in SA process | Stage in preparing DPD |
|--|--|
| Scoping Report | Evidence gathering to inform preparation of the document |
| Sustainability Statement | Consultation on Issues and Options |
| Draft Final Sustainability Appraisal Report | Consultation on Preferred Options document |
| Submission of Final Report to Secretary of State | Submission of document to Secretary of State |

12.2 This document forms the Sustainability Statement and is being published alongside the Issues and Options Report for the York Northwest Area Action Plan. The documents will be subject to public consultation for a period of six weeks beginning ___ until ___.

12.3 The Preferred Options Report is the next stage in the preparation of the Area Action Plan. A draft Sustainability Appraisal will be prepared alongside this to provide a detailed assessment of the sustainability implications of the options outlined. This report will include a summary of the SA process (including scoping, identification of Issues and Options) and a detailed appraisal of the preferred options. Details will also be provided on possible mitigation and monitoring.