
Annex 4: Sustainability Appraisal Summary Statement

For

Former British Sugar/Manor School Supplementary Planning Document

Contents:

1. INTRODUCTION	2
WHAT IS SUSTAINABILITY APPRAISAL?	2
THE SA FRAMEWORK.....	2
WHAT IS THIS DOCUMENT?	6
2. CONSULTATION COMMENTS	6
3. SUSTAINABILITY ANALYSIS BY THEME	8
POPULATION	8
THE ECONOMY AND EMPLOYMENT	9
HOUSING.....	9
SOCIAL INFRASTRUCTURE	10
TRANSPORT AND THE PATTERN OF MOVEMENT	10
CULTURE AND HERITAGE	11
THE ENVIRONMENT	12
4. FURTHER INFORMATION	17

1. Introduction

What is sustainability Appraisal?

- 1.1 Each of the core documents within the LDF will be subject to Sustainability Appraisal (SA). SA is a process of identifying and evaluating a plan’s impacts on social, economic and environmental objectives for the city and recommends how the plan can become more sustainable by suggesting amendments to avoid or mitigate any negative impacts identified. The findings of the SA are then taken on board within the Plan’s development and reflected in further drafts of the strategies to ensure it maximises its contribution towards sustainable development.
- 1.2 The SA process for York incorporates the requirement for European legislation (EU Directive 2001/42/EC), which requires spatial and land use plans to undergo Strategic Environmental Assessment (SEA). SEA is an iterative assessment process whereby the potential significant environmental effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. This document clearly sets out where the requirements of the SEA Directive have been addressed. Figure 1 indicates where information required by the SEA Directive can be found in this report.

The SA Framework

- 1.3 Figure 1 sets out the SA Objectives and which objective addresses each SEA topic. Although the objectives are referenced, e.g. EC1, no priority has been given to ranking as each objective has been seen as important.

Figure 1: SA Objectives and related SEA topics

Headline Objective		
To reduce York’s Ecological Footprint		
Sub-objective: To reduce the York’s Carbon Footprint		
Economic		
SEA	Objective	Sub-objective
Population	(EC1) Good quality employment opportunities available for all	<ul style="list-style-type: none"> • Provide employment opportunities for local people • Promote or support equal employment opportunities • Offer employment opportunities to disadvantaged groups • Seek to improve accessibility to employment opportunities (incorporating the provision of quality affordable housing and public transport infrastructure)

Population	(EC2) Good education and training opportunities for all which build the skills capacity of the population	<ul style="list-style-type: none"> • Promote lifelong learning and widening • Promote job creation skills and training linked to the development • Improve levels of basic skills • Build the confidence, self-esteem and capacity of individuals
Not applicable	(EC3) Conditions for business success, stable economic growth and investment	<ul style="list-style-type: none"> • Encourage investment • Enhance competitiveness • Maximise local skills • Support community-based businesses • Promote an evening economy in parts of the area to complement the town centre activity • Strengthen and diversify economic activity and promote regional economic growth
Population	(EC4) Local food, health care, education/training needs and employment opportunities met locally	<ul style="list-style-type: none"> • Ensure that essential services are accessible by non-car modes • Support the vibrancy of the City Centre • Ensure employment opportunities are accessible by public transport • Ensure that there is an adequate number of local services to cater for new development
Social		
Human Health/ Cultural Heritage/ Population	(S1) Enhance access to York's urban and rural landscapes, public open space/recreational areas and leisure and cultural facilities for all	<ul style="list-style-type: none"> • Increase provision of leisure facilities and recreation activities/venues • Increase participation in leisure and recreation activities • Improve access and affordability of local leisure and recreation facilities • Encourage participation by all user groups • Promote provision of high quality public realm • Provide additional community and leisure facilities • Increase provision of cultural activities/venues • Provide support for cultural providers and/or creative industries • Improve access and affordability of cultural facilities
Human health	(S2) Maintain or reduce York's existing noise levels	<ul style="list-style-type: none"> • Reduce noise pollution from current activities and potential for such pollution
Human Health	(S3) Improve the health and well being of the York Population	<ul style="list-style-type: none"> • Promote health and prevent ill health • Address health inequalities

Population	(S4) Safety and Security for people and property	<ul style="list-style-type: none"> • Reduce actual crime • Reduce 'fear of crime' • Reduce causes of road traffic accidents
Population	(S5) Vibrant communities that participate in decision-making	<ul style="list-style-type: none"> • Encourage engagement in community activities • Increase the ability of people to influence decisions • Improve community relations
Air/ Climatic Factors/ Human Health	(S6) Reduce the need to travel by private car	<ul style="list-style-type: none"> • Reduce the need to travel by increasing access to key resources and services by means other than the car • Provide/improve/ promote information about alternatives to car-based transport • Encourage employers to develop travel plans for staffs travel to/from work • Promote the use of car clubs • Promote a reduced car modal share target • Encourage car free and low car dependency housing • Encourage restricted parking for non-residential uses • Direct development to more sustainable locations and reduce the need to travel
Air/ Climatic Factors/ Human Health	(S7) Developments which provide good access to and encourage use of public transport, walking and cycling	<ul style="list-style-type: none"> • Ensure that new developments provide access to opportunities and facilities for all groups • Make sure that new developments provide transport/environment attractive to pedestrians and cyclists • Ensure that new developments provide better facilities for cyclists • Ensure that new developments promote new cycle and pedestrian links • Minimise the number of motorised journeys
Air/ Climatic Factors/ Human Health	(S8) A transport network that integrates all modes for effective non car based movements	<ul style="list-style-type: none"> • Reduce the need to travel by increasing access to key resources and services by means other than the car • Provide/promote/ improve information about alternatives to car-based transport • Improve access to opportunities and facilities for all groups • Encourage freight transfer from road to rail and water
Material Assets/ Human Health/	(S9) Quality affordable housing available for all	<ul style="list-style-type: none"> • Housing available to people in need (taking into account requirements of location, size, type and affordability) • Improve quality of the housing stock • Increase use of sustainable design and construction in York • Reduce the number of empty and difficult to let properties
Population	(S10) Social Inclusion and equity across all sectors	<ul style="list-style-type: none"> • Address the needs of disadvantaged and minority groups • Address the needs of older and younger people • Address the needs of disabled people • Promote religious and racial understanding

Environmental		
Material Assets	(EN1) Land use efficiency that maximises the use of brownfield land	<ul style="list-style-type: none"> • Make efficient use of land (appropriate density, protect good agricultural land, use brownfield land in preference to Greenfield sites)
Cultural Heritage	(EN2) Conserve and enhance the historic environment and cultural heritage of York and preserve the character and setting of the historic city	<ul style="list-style-type: none"> • Preserve, promote and enhance local culture and heritage • Preserve and enhance the character and appearance of archaeological sites, historic buildings, conservation areas, historic parks and gardens and other culturally important features and their settings • Safeguard the special character or setting of the city.
Biodiversity/ Flora and Fauna	(EN3) Conserve and enhance a bio-diverse, attractive and accessible natural environment	<ul style="list-style-type: none"> • Protect and enhance existing priority habitats and species and provide for appropriate long-term management of wildlife habitats • Increase understanding of ways to create new environmental assets and restore wildlife habitats • Increase the quality and quantity of woodland cover in appropriate locations • Promote, educate and raise awareness of the natural environment & biodiversity and promote access to wildlife on appropriate sites
Climatic factors/ Air	(EN4) Minimise greenhouse gas emissions and develop a managed response to the effects of climate change	<ul style="list-style-type: none"> • Reduce greenhouse gas emissions from transport • Reduce greenhouse gas emissions from domestic, commercial and industrial sources • Plan and implement adaptation measures for the likely effects of climate change
Climatic factors/ Air	(EN5) Improve Air Quality in York	<ul style="list-style-type: none"> • Reduce all emissions to air from current activities and the potential for such emissions • Minimise all emissions to air from new development • Improve air quality sufficiently to allow the revocation of all existing Air Quality Management Areas (AQMA) and prevent the need to declare further AQMA • Provide support, advice and encouragement for the business sector to reduce emissions to air • Promote innovation and development of low emission technology based industries • Support the development of city wide low emission infrastructure (e.g buses, taxis, EV recharging network etc)

Material Assets/ Air/ Climatic Factors	(EN6) The prudent and efficient use of energy, water and other natural resources	<ul style="list-style-type: none"> • Increase efficiency in water, energy and raw material use • Develop renewable energy/resources • Increase awareness and provide information on resource efficiency • Reduce use of non-renewable resources • New buildings to be designed to be energy efficient and minimise waste • Incorporate sustainable design principles and practices including construction techniques and technologies
Material assets	(EN7) Reduce Pollution and waste generation and increase levels of reuse and recycling	<ul style="list-style-type: none"> • Increase prevention, re-use, recovery and recycling of waste • Increase awareness and provide information on resource efficiency and waste • Develop renewable energy/resources
Climatic Factor	(EN8) Maintain and Improve Water Quality	<ul style="list-style-type: none"> • Protect and enhance the area's controlled waters • Prevent pollution of the water environment
Climatic Factors/ Water	(EN9) Reduce the impact of flooding to people and property in York.	<ul style="list-style-type: none"> • Reduce risk from flooding • Manage the effects of climate change from flooding • Ensure no new inappropriate development in the flood plain • Ensure the use of sustainable urban drainage systems

What is this document?

- 1.4 This SA summary statement provides a brief update to the SA analysis of the Former British Sugar / Manor School Consultation Sustainability Appraisal (December 2010) which accompanied the SPD on consultation. This document includes:
- Comments made by Statutory Bodies and CYC's response
 - An update on each theme presented in the previous SA acknowledging where changes to the SPD have affected the SA analysis.
- 1.5 A more comprehensive document will be produced alongside the final SPD incorporating the SA matrices.
- 1.6 This report follows the same format of the previous Sustainability Appraisal for the Former British Sugar/Manor School site whereby the analysis has been undertaken in themed sections.

2. Consultation Comments

- 2.1 The Former British Sugar/Manor School Draft SPD and accompanying Sustainability Appraisal went out for Consultation in December 2010. As part of the requirements for SA, we are obliged to consult Natural England, the Environment Agency and English Heritage as part of any consultation on the Sustainability Appraisal. Figure 2 sets out the comments received alongside the Council's response.

Figure 2: Consultation comments received

Statutory Body	CYC Response
Environment Agency	
<p>1. Support SA objectives and the proposed recommendations and mitigation that will take place. Consider that it will have a positive impact on the sustainability of development in the Former British Sugar Manor School Site</p>	<p>No response required.</p>
<p>2. The Water Framework Directive (WFD) is not discussed in Section 11b regarding water conservation and needs to be included for reason that the WFD is now the key piece of EU legislation that applies to all surface water bodies (including lakes, streams and rivers, groundwaters, groundwater dependent ecosystems, estuaries and coastal waters. As part of this inclusion, the Humber River Basin Management Plan should be included as it is a key plan for the protection and improvement of the water environment and contains key measures for Local Authorities.</p>	<p>We agree to add in the WFD and Humber River Basin Management Plan as part of the Baseline in Section 11b.</p>
<p>3. The Baseline data needs to be more clearly referenced in section 11f.</p>	<p>We agree to more clearly reference where the baseline data has come from.</p>
<p>4. Suggest the following for monitoring indicators for section 11b:</p> <ul style="list-style-type: none"> • % of local planning authority’s decision made against Environment Agency’s flood risk objection • % of SuDS implemented in new developments • EA’s water quality data (chemical and biological) • Change in statuses from the Catchment Abstraction Management Plans. 	<p>We agree to add these monitoring indicators to this section. As part of the Annual Monitoring Report (AMR) the Council already monitor the first and third bulleted points.</p>
English Heritage	
<p>1. Broadly agree with the assessment of likely affects which the Policy Principles and Statements might have upon those aspects of the City.</p>	<p>No response required.</p>
<p>2. Suggest it would be useful for the Council to state why it considers that an SA is necessary for this SPD given the Town and Country Planning Act 2008’s removal of the requirement</p>	<p>We agree to include as statement within the Introductory Section. The guidance requires the appraisal of Area based SPDs which adds detail not covered in higher level documents. This SPD expands upon the detail set out by the Strategic Allocation of British Sugar as part of Policy CS4 in the Core</p>

	Strategy Submission (Publication) and therefore the Council deemed it necessary to undertake a separate Sustainability Appraisal.
3. Figure 4, objective EN2: consider that the it would be preferable if the objective used the same language as PPS5 and suggests: “To conserve those elements which contribute to the significance of York’s historic environment including the special character and setting of the historic city”.	This objective is consistent with the objective in the Scoping Report and Core Strategy suite of SAs. It is therefore considered that this change does not need to be made.
4. Figure 4, objective EN2 sub-objective: suggest amendment to read: “To conserve those elements which contribute to the significance of archaeological sites, historic buildings...etc”	We agree that this change can be made.

Changes as a result of the comments will be available via the full SA report to be released alongside the SPD.

3. Sustainability Analysis by Theme

- 3.1 The SA for the Consultation Draft was split into themes as it was thought this more accurately picked up the issues in relation to the site. The themes set out in the Sustainability Appraisal Consultation document are replicated in this chapter together with information regarding relevant changes to the SPD, how this affects the SA analysis and if the recommendations have been taken on board.

Population

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

The Economy and Employment

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

Housing

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

Social Infrastructure

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

Transport and the Pattern of Movement

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

<ul style="list-style-type: none"> • Safety considerations are referred to through a link to the Council’s emerging 20mph speed policy. • Text associated with Statement 23 has been amended to reference modelling and mitigation required/ set out by the York Northwest Transport Masterplan. It also details that ongoing monitoring will be required and provision made in the transport masterplan for further amendments should be become apparent through the monitoring. • Text for Statement 23 also sets out how contributions to offset the impacts of the strategic infrastructure needed will be sought through Community Infrastructure Levy, negotiated a part of the planning process. 	
What the sustainability implications of the changes made?	
<p>The changes made in the text are positive for objective S6, S7 and S8. Through the additions and amendments the SA considers that the changes have strengthened the promotions of sustainable transport use as well as minimising travel, particularly by car. Furthermore, the York Northwest Transport Masterplan provides a further detailed evidence base for considerations and the SA welcomes its inclusion. This evidence base will be incorporated into the Transport Chapter.</p>	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> • Mitigation measures will need to be fully enforced to prevent adverse effect on congestion in the area and across the city and to minimise the associated adverse environmental impacts 	Yes – text has been included. Actual mitigation not yet required.
<ul style="list-style-type: none"> • The site will require a full environmental impact assessment, which should include a transport assessment for the area using the transport masterplan as a basis for analysis. 	Yes but not yet required.

Culture and Heritage

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

The Environment

(a) Climate Change

How has the SPD changed?	
<ul style="list-style-type: none"> • Extensive changes have been made to the text associated with Principle 4. In particular: Para 6.2: “The Climate Change Framework outlines the objective of reducing greenhouse gas emissions within the city, with a 40% reduction in carbon dioxide emissions by 2020 and 80% by 2050. The Sustainable Community Strategy seeks to reduce York’s ecological footprint and promote more sustainable lifestyles. New development within the city should contribute towards this with low carbon development and use of renewable energy sources, using a sustainable approach to design and construction to encourage sustainable living....Consideration should be given to offsetting the impact of the development on all aspects of the natural environment previously provided by the site (eg, water retention/conservation habitat).” • Text associated with Statement 8 now advocates solar passive design which makes the use of the site layout and buildings. This section also strengthens the requirement for development to include renewable energy generation within the masterplan as well as ensuring the development is resilient to a changing climate and well adapted for such changes as a result of this. • The SPD sets out (para 6.6) that the masterplan will have to have an associated Local Carbon Framework • The SPD clarifies that whilst the eco funding bid has not been pursued, there is still an aspiration to deliver highly sustainable homes and an eco/community hub building providing a meeting and information exchange venue as well as examples of sustainable technologies. • The text associated with statement 15 now includes in para 6.26 additional text: “Provision of green infrastructure should also demonstrate how the development will adapt to future climate change and address issues such as effect on biodiversity/habitat, rainfall variations, and the provision of cooling through the natural environment.” • Through Theme 3 there is more reference made to reducing the need to travel and low emission / sustainable travel modes. See Transport theme for further details. 	
What the sustainability implications of the changes made?	
<p>The reference to tackling climate change has been integrated more into the SPD with overt references to the Climate Change Framework, adaptation techniques, mitigation and offsetting measures. Furthermore, there is strengthened reference as to the requirements of renewable energy provision and ensuring buildings are sustainable from the materials they use to their energy consumption. Whilst this has been discussed in previous SA analysis, these changes will help to meet SA objective EN4 (Minimising greenhouse gas emissions and tackling climate change) and the Headline indicator (to reduce York’s ecological footprint) more definitely. The SA particularly welcomes the requirement for the York Northwest area to have a Local Carbon Framework to set out requirements, mitigation and monitoring of the sites to understand its pre and post development impacts.</p>	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> • Principle 4 sets an overarching theme for the whole SPD. The SA considers that this should be the first theme to be addressed within the SPD to highlight and embed this issue up front. 	<p>No. This theme has been strengthened however.</p>
<ul style="list-style-type: none"> • There is no link to develop a managed response to the effects of 	<p>Yes</p>

<p>climate change. The SA suggests that this is addressed throughout relevant sections of the SPD via minimising, through design, the impacts of a changing climate on the built and natural environment</p>	
<ul style="list-style-type: none"> Paragraph 6.3 references sustainability as a guiding principle to development. It would be beneficial for climate change to also be referenced, particularly given that this is a fundamental cause for being sustainable. 	<p>Yes</p>
<ul style="list-style-type: none"> The SA would like further clarity with regards to how statement 10 fits under Principle 4 as principle 4 advocates that “the <i>highest</i> achievable standards of sustainability are embedded at all stages of the development” but statement 10 states “subject to the availability of funding”. Should the approach be that areas which achieve funding are required to meet the standards of eco town principles because this provides a clear steer for development. The SA strongly disagrees that “subject to funding” should be the premise for this statement as it gives a ‘get out’ clause for high sustainability standards, particularly as the justification states that this is an “exemplar scheme, which will act as a benchmark for later stages of the development.” 	<p>No. However, the statement does now set out its aspiration to continue to deliver highly sustainable homes. The statement has also been revised to detail that eco-settlement funding hasn’t been pursued and that alternate funding may be used to provide an eco hub community building.</p>
<ul style="list-style-type: none"> Operation is absent and it is unclear how this will be delivered. The SA recommends that this need to be addressed. 	<p>Yes. The Climate Change Framework is referenced and there is now a requirement for a Local Carbon Framework for York Northwest. Furthermore the delivery chapter requirements the planning documents to set out delivery of sustainability solutions.</p>
<ul style="list-style-type: none"> There is no link between this principle and the objective relating to develop a managed response to the effects of climate change. The SA suggests that this needs to be addressed via incorporating adaptation design into the brief. 	<p>Yes.</p>
<ul style="list-style-type: none"> The SA recommends that the site uses grey water systems in order to minimise water consumption. 	<p>Yes, although grey water systems are not explicitly mentioned, the SPD references water conservation and a water strategy under Principle 4.</p>
<ul style="list-style-type: none"> The SA also recommends that cross references should be made 	<p>Yes.</p>

to ensure landscaping is considered alongside climate change as a mitigation measure which can be flexible and used to adapt to the changing climate.	
-------------------------------------------------------------------------------------------------------------------------------------------------------	--

(b) Water

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

(c) Air Quality

How has the SPD changed?	
<ul style="list-style-type: none"> The SPD now references low carbon development and specifies that a Local Carbon Framework is required. It is anticipated that this will set out a managed approach and mitigation techniques and well as monitoring as part of the development process. Principle 9 (para 7.19) now acknowledges that: "Traffic from the development will have an impact on nearby air quality management areas." Through Theme 3 there is more reference made to reducing the need to travel and low emission / sustainable travel modes. See Transport theme for further details. 	
What the sustainability implications of the changes made?	
The specification of a Local Carbon Framework as well as low carbon transport and construction will have positive impacts on SA objective EN5 (Improving Air Quality). Further more, there is now a clear acknowledgment that these will be an impact on air quality management zones. This goes alongside the Council's commitment to reducing carbon emissions and is now an explicit element of the site's development that will need mitigation. The SA welcomes this reference as it will strengthen how the development meets objective EN5.	
Have the previous recommendation been taken on board?	
<ul style="list-style-type: none"> Due to the potential impact on air quality across the city, alternatives to the car must be researched and strongly promoted within any scheme to develop this area. Planning applications will be expected to include measures such as provision for electric vehicle infrastructure, car clubs 	Yes – Theme 3 has strengthened its requirements set out in this recommendation. Also, the delivery and

<p>(incorporating electric vehicles), green travel plans and funding / monetary contributions for low emission refuse trucks and buses. City of York Council’s Sustainable Transport team should be contacted for advice. Where vehicles are considered necessary, any developer of the site should actively promote the uptake of smaller/ cleaner / low emission vehicles as far as possible via provision of necessary infrastructure and incentives for their use such as priority access, reduced charges and provision of a significant number of electric vehicle recharge points. An early discussion with the Environmental Protection Unit (EPU) is encouraged to determine low emission measures that are suitable for the site.</p>	<p>implementation sections sets out that a Sustainable Travel Plan and Transport Assessment is required.</p>
<ul style="list-style-type: none"> • In line with the Council’s emerging Low Emission Strategy (LES) any developer needs to demonstrate how they are meeting ‘best endeavours’ for reducing emissions on the site during both construction and operation phases. This will include a full appraisal of methods for heating and supplying power to the site to ensure that the correct technologies are chosen in terms of both carbon and local air quality emissions (NO_x and PM₁₀). 	<p>Yes through the requirement for a Local Carbon Framework</p>
<ul style="list-style-type: none"> • Prior to any works commencing on site, a construction environmental management plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The CEMP shall identify the steps and procedures that will be implemented to minimise the creation and impact of noise, vibration and dust resulting from the site preparation, demolition, groundwork and construction phases of the development. 	<p>Yes. In the Delivery and implementation section.</p>

(d) Biodiversity

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

What the sustainability implications of the changes made?

The SA welcomes the recognition of formal designation of the Bee Bank for nature conservation and stands by previous comments relating to ensuring that this is buffered thoroughly in order for its protection. It also welcomes further acknowledgment for consideration of the need to mitigate /offset the potential impacts from developments for nature conservation and biodiversity in several places within the SPD. The SA also welcomes that a Tree Strategy is emerging for the site as this will promote biodiversity and protect existing trees as well as the SPD requiring that Strategic Landscaping is considered at the beginning of the planning process. All of these elements are positive for SA Objective EN 3 (Conserve and enhance a biodiverse, attractive and accessible natural environment).

The SA remains unsure of the potential impact of transport schemes connected with the site. The new potential bridge would have to for example show how potential impacts were to be mitigated. The SA however, does welcome more explicit regard for the impacts on the natural environment.

Have the previous recommendation been taken on board?

<ul style="list-style-type: none"> In addition to ensuring the retention of existing areas which provide valuable habitat, it is recommended that greenspaces interlink throughout the site to form a network and that, where appropriate, landscaping schemes use native species and wildlife planting. 	<p>Yes although explicit schemes will need to be submitted alongside the planning application.</p>
<ul style="list-style-type: none"> The long-term management plan should consider how the landscape and Green Infrastructure network on the site could be managed in a way that promotes biodiversity. 	<p>Yes.</p>

(e) Energy and Waste**How has the SPD changed?**

- The first statement of Principle 4 has been amended to read: “New development within the city should contribute towards this with low carbon development and use of renewable energy sources, using a sustainable approach to design and construction to encourage sustainable living”.
- Statement 8 (para 6.5) has been amended to read: “Minimising energy consumption in all buildings and adopt Solar Passive Design and in particular site design and layout that favours south facing roof spaces which buildings are likely to have pitched roofs”. Another bullet point has also been amended to read: “All major developments must incorporate on site renewable/low carbon energy generation equipment to reduce predicted carbon emissions by at least 10% as set out in York’s Sustainable Design and Construction Interim Planning Statement.”
- The SPD now requires a Local Carbon Framework for York Northwest.
- The Delivery and Implementation section requires that: “The provision of renewable energy technologies should be considered at the beginning of the planning process, if appropriate and viable to providers”.

What the sustainability implications of the changes made?

The amendments within the SPD strengthen the requirements for renewable energy use and energy consumption. In particular, the type of systems to be used and amount of renewable energy to be produced has been made more explicit. Furthermore, the Delivery and

Implementation section now make it clear that this has to be considered at the beginning of the process. Setting this out is positive in terms of meeting SA objective EN6 (the prudent use of energy, water and other natural resources).

There are no additional sustainability comments for waste.

Have the previous recommendation been taken on board?

<ul style="list-style-type: none"> Both the sustainable waste and resources plan and the Low Carbon Energy Generation Strategy are presented at the same time as the masterplanning process to understand how the measures are incorporated throughout the site 	<p>Yes. This is required within the submission documents alongside the planning application.</p>
<ul style="list-style-type: none"> The SA would welcome further explanation of what standards are required on the urban eco-settlement (statement 9) over and above the measures set out under Statement 8. 	<p>No but the specification for measures in statement 8 has been strengthened.</p>

(f) Soil and Contamination

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

4. Further Information

For further information on anything detailed in this report or on the Local Development Framework suite of Sustainability Appraisals, please contact:

Alison Cooke | Development Officer (Research and Development)

t: 01904 551467 | e: alison.cooke2@york.gov.uk

City of York Council | **Integrated Strategy Unit** | City Strategy | 9 St Leonard's Place | York YO1 7ET