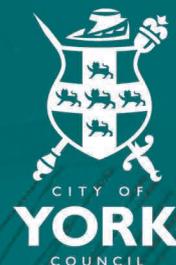


# Annex 10



YORK

## CITY OF YORK Sustainability Appraisal Technical Note





# Technical note: City of York Council Local Plan

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## 1. Introduction

### Background

- 1.1.1 Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) is providing support to City of York Council to assist with the preparation of a Sustainability Appraisal (SA) of their Local Plan. Amec Foster Wheeler has been assisting the City Council with the preparation of SA since the Council consulted on its Local Plan Preferred Options in June 2013. Following this, Amec Foster Wheeler in conjunction with the Council prepared a SA Report and Habitat Regulations Assessment (HRA) Report to accompany a Publication Draft of the Local Plan in September 2014.
- 1.1.2 The 2014 Publication Draft Local Plan set out the Council's vision for York out to 2030 and provided the spatial planning response to the challenge of growth. It was developed taking into account national planning policy and guidance, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base studies and the outcomes of engagement. The Publication Draft Local Plan also utilised the Local Development Framework (LDF) Core Strategy, which was withdrawn in 2012 following the publication of the National Planning Policy Framework (NPPF) and the (partial) revocation of the Regional Strategy (the Yorkshire and Humber Plan)<sup>1</sup> in order to produce a local plan compliant with new national planning policy. However, a decision was taken by Full Council in October 2014 which halted proceeding to the Publication Draft consultation whilst further work was undertaken to understand York's housing requirements.
- 1.1.3 Since 2014, the City of York has been updating its Local Plan evidence base. During summer 2016 the Council undertook a Preferred Sites Consultation which set out the Council's preferred site allocations alongside updated technical work underpinning housing and employment growth. This was accompanied by an interim SA which provided commentary on the performance of sites against the SA Objectives.
- 1.1.4 The next stage, following confirmation of the levels of housing and employment growth for the city, will be to proceed with the preparation and consultation on a Draft Local Plan during summer 2017.

### The Requirement to Prepare a Local Plan

- 1.1.5 The National Planning Policy Framework (NPPF) (March, 2012)<sup>2</sup> sets out (at paragraphs 150-157) that each local planning authority should prepare a local plan for its area. Local plans should set out the strategic priorities and policies to deliver:

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<sup>1</sup> Statutory Instrument 2013 No. 117 *Town and Country Planning, England The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013*.

<sup>2</sup> Department for Communities and Local Government (2012) *National Planning Policy Framework*. Available from [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf) [Accessed June 2017].

- ▶ The homes and jobs needed in the area;
- ▶ The provision of retail, leisure and other commercial development;
- ▶ The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- ▶ The provision of health, security, community and cultural infrastructure and other local facilities; and
- ▶ Climate change mitigation and adaptation and conservation and enhancement of the natural and historic environment, including landscape.

1.1.6 Planning Practice Guidance (2014)<sup>3</sup> clarifies (at paragraph 002 'Local Plans') that local plans "should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered".

## 2. Purpose

2.1.1 Paragraph 6 of the NPPF reiterates the requirements of section 39 (2) of the Planning and Compulsory Purchase Act 2004:

*"The purpose of the planning system is to contribute to the achievement of sustainable development. The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system."*

2.1.2 NPPF Paragraph 151 states that:

*"Local Plans must be prepared with the objective of contributing to the achievement of sustainable development"*.

2.1.3 In consequence, in order to meet the statutory and national planning policy requirements, it is essential that the City of York Local Plan contributes to a sustainable future for the plan area. To support this objective, the Council is required to carry out a SA of the Local Plan<sup>4</sup>. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised. It also incorporates a process set out under a European Directive<sup>5</sup> and the related UK regulations<sup>6</sup> called Strategic Environmental Assessment (SEA).

2.1.4 SA (including SEA) has been undertaken at all of the key stages in the development of the City of York Local Plan.

2.1.5 The Executive Briefing Paper provides an update regarding the evidence base relating to housing and employment growth for the City and identifies the findings from the Local Plan Site Selection process relating to the MoD sites which came forward following the Preferred Site Consultation during summer 2016.<sup>7</sup>

2.1.6 In order to support discussion on the level of housing and employment growth in the Executive Briefing Paper, an SA has been undertaken of the overall spatial strategy (drawing on the SA which accompanied the 2014 Publication Draft Local Plan) and housing and employment growth recommendations along with a high level appraisal on the proposed spatial distribution of the strategic sites.

2.1.7 This Technical Report presents the findings of the SA.

<sup>3</sup> Department for Communities and Local Government (2014) *Planning Practice Guidance*. Available from <http://planningguidance.planningportal.gov.uk/> [Accessed June 2017].

<sup>4</sup> The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

<sup>5</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

<sup>6</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

<sup>7</sup> Following the conclusion of the 2016 Local Plan Preferred Sites Consultation the MOD announced the release of three sites in York – Imphal Barracks, Fulford Road and Queen Elizabeth Barracks and Towthorpe Lines.

- 2.1.8 This SA work, when included in a SA Report to accompany the Draft Local Plan, will enable the Council to demonstrate that the 'plan' and reasonable alternatives to the overall spatial strategy in terms of the scale and distribution of development have been appraised consistent with the requirements of Article 5(1) of the SEA Directive and Section 12 (2) of the SEA Regulations and ensure that SA case law<sup>8</sup> requirements regarding "an equal examination of the alternatives" have been addressed.
- 2.1.9 As outlined within the Executive Briefing Paper, until a decision is reached regarding the level of growth for York, no assessment has been made with regard to individual sites. It is envisaged that such an assessment will be undertaken and published within an Interim SA Report alongside a Draft Local Plan during summer 2017.
- 2.1.10 The remainder of this technical note is structured as follows:
- ▶ Section 3 provides an overview of the requirement for SA;
  - ▶ Section 4 outlines the methodology which has been adopted;
  - ▶ Section 5 provides a summary of the effects which have been appraised, including the appraisal matrices for the housing figures based upon baseline data from DCLG and figures recommended by GL Hearn. An appraisal of the growth options for employment land has also been undertaken;
  - ▶ Section 6 contains conclusions and recommendations.

### 3. Sustainability Appraisal

#### The Requirement for Sustainability Appraisal

- 3.1.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of the SEA Directive<sup>9</sup>, and the related UK regulations<sup>10</sup>.
- 3.1.2 The SEA Directive and related UK regulations seek to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. The aim of the Directive is "*to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.*"
- 3.1.3 At paragraphs 150-151, the NPPF sets out that local plans are key to delivering sustainable development and that they must be prepared with the objective of contributing to the achievement of sustainable development. Paragraph 165 reiterates the requirement for SA/SEA as it relates to local plan preparation:
- "A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors."*
- 3.1.4 The Planning Practice Guidance also makes clear that SA plays an important role in demonstrating that a local plan reflects sustainability objectives and has considered reasonable alternatives. In this regard, SA will help to ensure that a local plan is "justified", a key test of soundness that

<sup>8</sup> Para 71 of *Heard v Broadland District Council & Ors* [2012] EWHC 344 (Admin)

<sup>9</sup> Available from <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32001L0042&from=EN> [Accessed June 2017].

<sup>10</sup> Statutory Instrument 2004 No. 1633 *The Environmental Assessment of Plans and Programmes Regulations 2004*. Available from [http://www.legislation.gov.uk/ukSI/2004/1633/pdfs/ukSI\\_20041633\\_en.pdf](http://www.legislation.gov.uk/ukSI/2004/1633/pdfs/ukSI_20041633_en.pdf) [Accessed June 2017].

concerns the extent to which the plan is the most appropriate strategy, when considered against the reasonable alternatives and available and proportionate evidence.

- 3.1.5 In this context, SA is an integral part of the preparation of the Local Plan for the City of York. SA of the Local Plan will help to ensure that the likely social, economic and environmental effects of the Plan are identified, described and appraised. Where negative effects are identified, measures will be proposed to avoid, minimise or mitigate such effects. Where any positive effects are identified, measures will be considered that could enhance such effects.

## Sustainability Appraisal of the City of York Local Plan

- 3.1.6 The development of the Local Plan reflects work which began in 2005 when the Council commenced the preparation of its Local Development Framework (LDF) Core Strategy. This has included engagement, assessment and the development of a substantial body of evidence. SA has also been an integral part of the development of the Local Plan from the earliest stage of Core Strategy preparation.
- 3.1.7 Specifically, SAs have been undertaken of the following local plan documents:
- ▶ Core Strategy Issues and Options 1 (2006);
  - ▶ Core Strategy Issue and Options 2 (2007);
  - ▶ Core Strategy Preferred Options (2009);
  - ▶ Core Strategy Submission (Publication) (2011);
  - ▶ Local Plan Preferred Options (2013);
  - ▶ Further Sites Consultation (2014);
  - ▶ Publication Draft Local Plan (2014); and
  - ▶ Preferred Sites Consultation (2016).
- 3.1.8 The approach to the appraisal of the Local Plan (including the SA framework and objectives) is based on the methodology described in the SA Scoping Report (2013).

## 4. Methodology

- 4.1.1 This section outlines the methodology used to appraise the spatial strategy, the housing and employment growth options proposed for the City of York and the proposed spatial distribution of the proposed strategic sites. The SA objectives used for this appraisal are consistent with those developed to appraise the draft Local Plan (including the 2014 Publication Draft Local Plan) and were consulted upon in the 2013 Scoping Report. They reflect a review of relevant plans and programmes, an analysis of socio-economic and environmental baseline conditions and the subsequent identification of key sustainability issues.
- 4.1.2 Establishing appropriate objectives and guide questions is central to appraising the sustainability effects of the draft Local Plan. Broadly, SA objectives present the preferred sustainability outcome which usually involves minimising detrimental effects and enhancing positive ones. The SA process considers the contribution of the plan, vision, outcomes and individual policies and allocations towards each of the appraisal objectives.
- 4.1.3 **Table 4.1** presents the SA objectives and the key questions/guidance relating to each of the objectives used in the appraisal. The SEA Directive topic(s) to which each of the SA objectives relates is included in the third column.

Table 4.1 The SA Framework

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
1. To meet the diverse housing needs of the population in a sustainable way.	<ul style="list-style-type: none"> <li>Deliver homes to meet the needs of the population in terms of quantity, quality</li> <li>Promote improvements to the existing and future housing stock</li> <li>Locate sites in areas of known housing need</li> <li>Deliver community facilities for the needs of the population</li> <li>Deliver pitches required for Gypsies and Travellers and Showpeople</li> </ul>	Population
2. Improve the health and wellbeing of York's population	<ul style="list-style-type: none"> <li>Avoid locating development where environmental circumstances could negatively impact on people's health</li> <li>Improve access to open space / multi-functional open space</li> <li>Promotes a healthier lifestyle through access to leisure opportunities (walking /cycling)</li> <li>Improves access to healthcare</li> <li>Provides or promotes safety and security for residents</li> <li>Ensure that land contamination/pollution does not pose unacceptable risks to health</li> </ul>	Population, Human Health
3. Improve education, skills development and training for an effective workforce	<ul style="list-style-type: none"> <li>Provide good education and training opportunities for all</li> <li>Support existing higher and further educational establishments for continued success</li> <li>Provide good quality employment opportunities available to all</li> </ul>	Population
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	<ul style="list-style-type: none"> <li>Help deliver conditions for business success and investment</li> <li>Deliver a flexible and relevant workforce for the future</li> <li>Deliver and promote stable economic growth</li> <li>Enhance the city centre and its opportunities for business and leisure</li> <li>Provide the appropriate infrastructure for economic growth</li> <li>Support existing employment drivers</li> <li>Promote a low carbon economy</li> </ul>	Population
5. Help deliver equality and access to all	<ul style="list-style-type: none"> <li>Address existing imbalances of equality, deprivation and exclusion across the city</li> <li>Provide accessible services and facilities for the local population</li> <li>Provide affordable housing to meet demand</li> <li>Help reduce homelessness</li> <li>Promote the safety and security for people and/or property</li> </ul>	Population, Human Health
6. Reduce the need to travel and deliver a sustainable integrated transport network	<ul style="list-style-type: none"> <li>Deliver development where it is accessible by public transport, walking and cycling to minimise the use of the car</li> <li>Deliver transport infrastructure which supports sustainable travel options</li> <li>Promote sustainable forms of travel</li> <li>Improve congestion</li> </ul>	Air, Climatic Factors
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	<ul style="list-style-type: none"> <li>Reduce or mitigate greenhouse gas emissions from all sources</li> <li>Plan or implement adaptation measures for the likely effects of climate change</li> <li>Provide and develop energy from renewable, low and zero carbon technologies</li> <li>Promote sustainable design and building materials that manage the future risks and consequences of climate change</li> <li>Adhere to the principles of the energy hierarchy</li> </ul>	Climatic Factors
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	<ul style="list-style-type: none"> <li>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs</li> <li>Protect and enhance locally important nature conservation sites (SINCS)</li> </ul>	Biodiversity, Flora & Fauna, Human Health

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

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

Table 4.2 The SA Objectives Compared Against the SEA Directive Topics

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

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

4.1.5 For each growth option / strategy, an overall 'score' has been provided against each SA objective, according to the scoring system in **Table 4.3**.

Table 4.3 Scoring System Used in the SA of Sites

Score	Description	Symbol
Significant Positive Effect	The proposed option contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option does not have any effect on the achievement of the objective.	0
Minor Negative Effect	The proposed option detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option detracts significantly from the achievement of the objective.	--
Uncertain	The proposed option has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an assessment to be made.	?

## 5. Appraisal

### 5.1 Spatial Strategy

5.1.1 The Spatial Strategy for the City of York was defined in the 2014 Publication Draft Local Plan and comprised of the following policies:

- ▶ SS1: Delivering Sustainable Growth for York which identified the need to provide sufficient land to accommodate over 13,500 new jobs and to provide a minimum annual provision of 996 new dwellings over the plan period (with 1,170 delivered over the first five years of the plan period);

- ▶ SS2: The Role of York's Green Belt;
- ▶ SS3: The Creation of an Enduring Green Belt;
- ▶ SS4: York City Centre;
- ▶ Policies SS5-SS10 contained site specific policies relating to; Whinthorpe; East of Metcalf Lane; Clifton Gate; Land North of Monks Cross; York Central and Castle Piccadilly.

5.1.2 Following the decision by Full Council, the housing and employment numbers in SS1 have been subject to further consideration and revision. Similarly those site specific policies relating to Strategic Sites, namely SS5-SS10, will also be subject to revision and amendment.

5.1.3 However, the focus of the strategy "*to promote sustainable patterns of growth by prioritising development within and/or as an extension to the urban area and through the provision of a single new settlement*" will endure and is expected to form the basis of the 2017 Draft Local Plan.

5.1.4 The SA of the Spatial Strategy Policies contained within the 2014 Publication Draft Local Plan concluded that the scale of provision meant that a range of housing could be provided (particularly affordable housing) to meet the objectively assessed housing needs of the City. This would build strong, sustainable communities by addressing the housing and community needs of York's current and future population, including that arising from economic and institutional growth. This was assessed as having a significant positive effect on SA Objective 1 (Housing).

5.1.5 Taken together, the spatial strategy policies were expected to enhance the health and wellbeing of York's population through:

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

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

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

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

5.1.9 Significant levels of new development would inevitably bring change to the character of the City, particularly where this was associated with strategic sites. However, effects on the setting of the City could be managed and it was noted that Policy SS1 specifically sought to conserve and enhance York's historic assets and character whilst policies SS4 to SS10 included locational specific guidance in this regard. The re-definition of the City's Green Belt through policies SS2 and SS3 would also help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the City and would look to concentrate development in the urban area, with attendant sustainability benefits. In consequence, the spatial strategy policies were assessed as

having a positive effect on SA objectives relating to cultural heritage (SA Objective 14) and landscape (SA Objective 15).

- 5.1.10 An increase in population anticipated by Policy SS1 would have a negative effect on overall water usage and consumption across the City as well as waste generation.
- 5.1.11 Whilst growth of the City on the scale envisaged would inevitably bring negative effects (such as greenfield land-take and increased traffic) the suite of policies proposed would seek to ameliorate these impacts through sustainability measures which, for example, would encourage self-sufficiency and innovation in energy generation and the use of sustainable travel initiatives. The scale of the strategic sites could make such ambitions achievable in principle, although how these could be affected by unsustainable commuting patterns, for example, would require analysis over the longer term. In light of this assessment, the spatial strategy policies were appraised as having positive and negative affects against SA Objectives 6, 7, 9 and 12 reflecting the inevitable increase in vehicles and vehicle movements associated with the built development proposed for York. The extent of the cumulative impacts of this scale of development on the character of the City was considered uncertain, although the provisions for the sensitive masterplanning of City Centre sites in particular could in principle off-set adverse impacts and positively enhance character where regeneration was required.
- 5.1.12 Key uncertainties related to the longer term and cumulative effects of development on City character and specific issues such as flood risk, although retrospective analysis would be required to determine their precise scale and effects.
- 5.1.13 In determining the locations for this growth, a number of key environmental factors were considered as they provided an overarching narrative of influencing factors which shaped the choices in accommodating growth. The 2014 SA of the Publication Draft Local Plan concluded that this distribution of growth would have a positive effect across many of the SA objectives and that it performed better than the alternatives considered.
- 5.1.14 The spatial distribution to be taken forward for the draft Local Plan (2017) is understood to broadly follow the approach adopted at the Publication Draft Local Plan (2014) and more recently repeated in the Preferred Sites Consultation (2016) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement. Whilst the site specific boundaries of sites and their respective quantum of development may have changed, it is still considered that conclusions associated with the findings from the 2014 Appraisal remain applicable.
- 5.1.15 In preparing the Interim SA Report to support consultation on the Draft Local Plan, an assessment of the revised spatial strategy, including the updated quantum of housing and employment growth, along with the individual housing and employment sites will be conducted.

## 5.2 Housing Growth

- 5.2.1 The NPPF requires that local planning authorities identify their objectively assessed housing need (the OAHN), and that Local Plans translate those needs into land provision targets. Like all parts of the plan, such housing targets should be informed by robust and proportionate technical work.
- 5.2.2 For the purposes of this Technical Note we have compared the recommendation set out in the DCLG baseline which is based on the 2016 household projections and the latest technical work by GL Hearn which takes the DCLG baseline as its starting position and includes a 10% market signals uplift.
- 5.2.3 Figures previously considered for the baseline and OAHN which informed the housing growth figures which accompanied the 2014 Publication Draft Local Plan and 2016 Preferred Sites Consultation are superseded by the release of the 2016 based Household Projections and the SHMA Addendum (2017). The National Planning Practice Guidance (NPPG) sets out the recommended approach for calculating objectively assessed housing need. Paragraph 15 of the NPPG 'Housing and economic development needs assessments' states that "*Household projections published by the Department for Communities and Local Government should provide*

*the starting point estimate of overall housing need.*” However, the published household projections reflect trends that have happened in the past and the NPPG recognises these may have be adjusted upwards to reflect specific local circumstances. Paragraph 17 of this guidance states:

*“The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates. Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.”*

- 5.2.4 Furthermore, NPPG Paragraph 19 states that *“the housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings.”* The NPPG states that market signals may include land prices, house prices, rents, affordability, the rate of development and overcrowding. NPPG Paragraph 20 goes on to state that *“a worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.”* The NPPG does not provide guidance on how these worsening trends are accounted for within the need figure but requires a reasonable upward adjustment dependent on the significance of the affordability constraints. It states:

*“In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (eg the differential between land prices), the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be.”*

- 5.2.5 The latest technical work is based upon the 2016 released DCLG Household Projections and is likely to enable the Council to meet the requirements set out in the NPPG and paragraph 158 of the NPPF that:

*“Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.”*

- 5.2.6 The housing numbers identified are provided to assist in the comparison of the evidence based OAHN figures rather than total amount of housing required across the plan period in line with the NPPF. In developing the overall housing need for the plan, the City Council will also need to incorporate the other requirements of the NPPF e.g. shortfall in previous years. The NPPF compliant figure adopted for the Local Plan will need to be appraised for the Draft Local Plan. This technical report has appraised the following figures for housing growth for the City of York:
- ▶ DCLG Baseline (2016): 867dpa – based on the July 2016 Household Projections
  - ▶ GL Hearn recommended figure (2017): 953dpa – the demographic starting point for this figure was 867 per annum (based upon the July 2016 household projections). The figure also includes a 10% adjustment to include provision for affordable housing, in line with NPPG’s guidance for reasonable adjustments to the household projections to be made in light of market signals.
- 5.2.7 In developing the overall housing need for the Draft Local Plan, the City Council will also need to incorporate the other requirements of the NPPF e.g. shortfall in previous years. The NPPF compliant figure adopted for the Local Plan will need to be appraised for the Draft Local Plan.

Table 5.1 SA of Housing Growth Matrix

SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa	
1. To meet the diverse housing needs of the population in a sustainable way.	Short Term	+	+	<p><b>Likely Significant Effects</b> The DCLG figure identifies a baseline requirement OAHN of 867 dpa resulting in minor positive effects in the short and medium term with the potential for minor negative effects in the long term. The assessment of negative effects in the long term reflects the anticipated inability of the baseline figure to fully meet the identified objectively assessed need (which comprises the Government's baseline household projections and the modest market signals upwards adjustment).</p> <p>The recommended 2017 GL Hearn figure identifies an OAHN of 953 dpa resulting in minor positive effects in the short and medium term increasing to significant positive effects in the long term. The scale of housing delivery associated with this figure will meet housing demand based on the most recent population forecasts and would support the delivery of affordable housing. Analysis by GL Hearn in the 2017 SHMA Addendum identifies a shortfall in housing provision against previous targets. This past under delivery of housing may suggest that there is a 'backlog' of need.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> It is assumed that the delivery of housing will accord with the Spatial Strategy for York; namely to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement.</p> <p><b>Uncertainty</b> None.</p>
	Medium Term	+	+	
	Long Term	-	++	

SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa	
2. Improve the health and wellbeing of York's population	Short Term	-	-	<p><b>Likely Significant Effects</b> Housing growth is likely to generate minor, temporary adverse effects on health in the short term during construction (e.g. as a result of emissions to air from HGV movements and plant). Whilst effects will be dependent on the exact location of new development and its proximity to sensitive receptors, it can be assumed that new housing would be delivered within and in close proximity to existing residential areas. In the longer term, new housing could also adversely affect health due to, for example, emissions and increased traffic.</p> <p>It is anticipated that both housing figures will necessitate the need to accommodate development at greenfield sites which could result in the loss of open space.</p> <p>Each of the figures has been appraised negatively over the short, medium and long term. The 2017 recommended figure may have a greater effect than the baseline figure over the long term although unlikely to be significant.</p> <p><b>Mitigation</b> New housing development may provide opportunities to incorporate health facilities, open space and measures to facilitate walking and cycling. Local planning policy should be put in place to minimise impacts on health. Additionally, regulatory requirements to limit detrimental effects on health and wellbeing, beyond the remit of the local plan, will also mitigate effects.</p> <p><b>Assumptions</b> None</p> <p><b>Uncertainty</b> None</p>
	Medium Term	-	-	
	Long Term	-	-	
3. Improve education, skills development and training for an effective workforce	Short Term	+	+	<p><b>Likely Significant Effects</b> Investment in new development has the potential to stimulate increased investment in new facilities by generating demand (through the influx of new residents) and through developer contributions. Any investment in educational facilities and services would support educational attainment, which is recognised as being good within the City of York area.</p> <p>Furthermore, both the DCLG and GL Hearn figures are expected to help deliver student accommodation and a new settlement may encourage additional educational provision.</p> <p>Overall, the growth considered under each scenario have been assessed as having minor positive effects on this objective.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b></p>
	Medium Term	+	+	
	Long Term	+	+	

SA Objective	Housing Growth Comparison		Commentary on effects of each figure
	DCLG Baseline Figure <b>867 dpa</b>	GL Hearn Recommended Figure <b>953 dpa</b>	
			There is a risk that development may increase pressure on existing educational facilities and in particular primary schools within the City.
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	Short Term	+	<p><b>Likely Significant Effects</b> Housing development will generate economic benefits associated with construction e.g. direct job creation, supply chain benefits and increased spend in the local economy by contractors and construction workers. However, effects in this regard will be temporary and the extent to which the jobs that may be created benefit the City of York's residents will depend on the number of jobs created and the recruitment policies of prospective employers.</p> <p>In the medium and longer term new housing and associated population growth will in turn help enhance the viability and vitality of existing businesses within central York as well as other centres.</p> <p>The 2017 recommended figure will provide a scale of housing growth to support economic growth and as such it considered to have significant positive effects.</p> <p>Furthermore, all growth figures could mean the objectives of the York Economic Strategy 2016 – 2020 could be met and that York can fully capitalise from the Northern Powerhouse programme.</p> <p>Overall, both housing figures have been assessed as having minor positive effects on this objective, except for the 2017 recommended figure in the long term, which is considered to have a significant positive effect due to benefits derived from the quantum of development proposed.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.</p>
	Medium Term	+	
	Long Term	+	

SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa	
5. Help deliver equality and access to all	Short Term	+	+	<p><b>Likely Significant Effects</b></p> <p>Both the DCLG baseline and GL Hearn 2017 recommended figure would assist in meeting the net affordable housing requirement of 573 dwellings as identified in the 2016 SHMA.</p> <p>Residential development proposed of the scale proposed under both figures has the potential to improve the viability and vitality of existing shops, services and facilities in the areas where growth is located. New development may also encourage and support investment in existing, and the provision of new, services and facilities in the City of York through, for example, the receipt of developer contributions. This could help enhance the accessibility of existing and prospective residents to key services and facilities, although this would be dependent on the exact location of new development and the level of investment generated. However, depending on where new development is located, there is the potential for growth to increase pressure on existing community facilities and services.</p> <p>The Local Plan Site Selection Methodology identifies the need to locate development with sustainable access to facilities and service and to ensure sustainable access for transport.</p> <p>Overall, both levels of growth have been assessed as having minor positive effects on this objective. The 2017 recommended figure identified by GL Hearn is considered to have a significant positive effect in the long term.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> That an affordable housing policy requirement of 30% is maintained by the City Council.</p> <p><b>Uncertainty</b> None.</p>
	Medium Term	+	+	
	Long Term	+	++	
6. Reduce the need to travel and deliver a sustainable integrated transport network	Short Term	+/-	+/-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Focusing development in accordance with the Council's spatial strategy would have positive effects on the objective as it would significantly encourage people to live in the town centres where services and facilities are more accessible reducing the need to travel. Housing growth could also help to maintain existing, and (potentially) stimulate investment in, public transport provision in the City of York area.</p> <p>The scale of a stand-alone settlement is likely to result in a quantum of development which will result in the development of a new local centre(s) and facilities reducing the need for out-commuting.</p>
	Medium Term	+/-	+/-	

SA Objective	Housing Growth Comparison		Commentary on effects of each figure	
	DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa		
	Long Term	+/-	+/-	<p>In the short term (during construction) and once development is complete there is likely to be an increase in transport movements and associated congestion.</p> <p>Overall, the levels of growth proposed under both figures have been assessed as having minor positive and negative effects on this objective.</p> <p><b>Mitigation</b> Measures should be put into effect to ensure consistency with the requirements of paragraph 17 of the NPPF which identifies as a core principle of planning the active management of patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are, or can be made, sustainable.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> None.</p>
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.	Short Term	-	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Minor negative effects are anticipated to arise from housing growth generating an increase in greenhouse gases both during construction (e.g. due to emissions from HGV movements and plant) and once development is complete (e.g. due to increased traffic generation and energy use in new dwellings).</p>
	Medium Term	-	-	<p>As highlighted under SA Objective 6, housing growth could help to maintain existing, and (potentially) stimulate investment in, public transport provision in the area which could help to minimise greenhouse gas emissions associated with car use.</p> <p>Overall, the growth under each figure have been assessed as having minor negative effects on this objective in the short, medium and long term.</p>
	Long Term	-	-	<p><b>Mitigation</b> There may be opportunities to promote and encourage sustainable modes of transport alongside new development.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain).</p> <p>Housing growth may present opportunities to increase investment in transport infrastructure and renewable energy.</p>

SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa	
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	Short Term	-/?	-/?	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Within a relatively small area (272 square kilometres), the York area boasts a range of sites with habitat and conservation value at international, national, regional and local levels of importance. These sites include ancient flood meadows, species-rich grasslands, lowland heath, woodlands and wetlands, which in turn are home to a variety of European protected species including bats, great crested newts, otters and other rare species such as the Tansy Beetle.</p> <p>Housing growth could have an adverse effect on biodiversity as a result of land take/habitat loss and disturbance during construction and increased recreational pressure once development is complete.</p> <p>It is likely that all scenarios will require development on greenfield sites – this has been assessed as having a negative effect on this objective.</p> <p>However it is considered that any adverse effects will be mitigated through the implementation of Local Plan policies related to biodiversity. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies the need to protect environmental assets (including nature conservation).</p> <p>The presence of Nature Conservation Sites of International importance will necessitate a Habitats Regulations Assessment in accordance with the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') (Amendment) Regulations 2010.</p> <p>Residential development at the level presented in both figures may provide opportunities to enhance the existing, or incorporate new, green infrastructure. This could potentially have a positive or significantly positive effect on this objective by improving the quality and extent of habitats and by increasing the accessibility of both existing and prospective residents to such assets.</p> <p>Overall, the growth figures have been assessed as having minor negative effects on this objective. However, there is the potential for significant negative effects to arise should development result in adverse effects on designated sites, although this is currently uncertain.</p> <p><b>Mitigation</b> Measures to retain and enhance features of biodiversity interest e.g. species rich grassland and hedgerows on development sites should be adopted.</p> <p><b>Assumptions</b> None of the development sites to be taken forward in the local plan will have an adverse effect on features of international importance.</p> <p><b>Uncertainty</b> The effects of development on biodiversity which will be dependent to an extent on the location of development, the nature of detailed proposals and the outcome of site specific investigation, which at this stage are uncertain.</p>
	Medium Term	-/?	-/?	
	Long Term	-/?	-/?	

SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa	
9. Use land resources efficiently and safeguard their quality.	Short Term	-	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Whilst effects against this objective are largely dependent on the location of development, which at this stage is uncertain, it is expected that both of the housing figures will necessitate the need for some development on greenfield sites. This likely requirement has therefore been assessed as having a negative effect on this objective.</p> <p>The NPPF says that planning should “<i>encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value</i>”. The Council should encourage developers to consider whether there is previously developed land available in suitable locations for new development, rather than locating development on undeveloped land.</p> <p>Overall, all of the growth proposed under both figures are considered to have minor negative effects on this objective.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> It is assumed that development sites would avoid development on best and most versatile land and encourage development on previously developed land.</p> <p><b>Uncertainty</b> None.</p>
	Medium Term	-	-	
	Long Term	-	-	

SA Objective		Housing Growth Comparison		Commentary on effects of each figure
		DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa	
10. Improve water efficiency and quality.	Short Term	-	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Housing will result in increased water consumption both during construction and in the longer term once development is complete.</p> <p>The increase in local population is expected to increase the demand on water resources, which has the potential for a negative effect on water quality. Yorkshire Water's Water Resources Management Plan 2014 has weighed up the demand and supply of water for the forthcoming 25 years until 2039/40. The demand model has inbuilt assumptions regarding the projected population and households as well as the projected effects of climate change, leakage, implemented water efficiency measures and assumed new homes in accordance with the Code for Sustainable Homes (the requirements of which are now contained within Building Regulations).</p> <p>York lies within the Grid SWZ zone within Yorkshire Water's area, which identifies a deficit between supply and demand from 2018/19 is 2.67Ml/d, increasing to 108.65Ml/d by 2039/40. A range of solutions are proposed to ultimately meet the forecast supply demand deficit in the Grid SWZ as well as development of existing or new assets. The options selected include leakage reduction, use of an existing river abstraction licence, three groundwater schemes and customer water efficiency. As the plan period stretches out, there is less certainty with regard to the mix of measures to be used and they are also likely to be revised in the next WRMP, to be adopted in 2019.</p> <p>Overall, all of the growth identified under both figures have been assessed as having a minor negative effect against this objective.</p> <p><b>Mitigation</b> Customer water efficiency measures which could be incorporated on the development include water metering, water harvesting and the regulation of tap and shower flows. Implementation of efficiency measures has the potential to result in a reduction of per capita in water consumption, however the uptake of these measures is not yet known.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> None.</p>
	Medium Term	-	-	
	Long Term	-	-	
11. Reduce waste generation and increase level of reuse and recycling.	Short Term	-	-	<p><b>Likely Significant Effects</b> No significant effects are anticipated.</p> <p>Housing growth will result in resource use, particularly during the construction of new dwellings. Residential development will generate construction</p>

SA Objective	Housing Growth Comparison		Commentary on effects of each figure	
	DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa		
	Medium Term	-	-	<p>waste, although it is anticipated that a proportion of this waste would be reused/recycled.</p> <p>Overall, the growth proposed under both figures have been assessed as having a minor negative effect on this objective.</p> <p><b>Mitigation</b> The performance of the selected housing figure will benefit from ensuring that recycling facilities are included in the design to ensure any waste created once the development is in operation is minimised.</p> <p>Local Plan policies should encourage the use of recycled and secondary materials in new developments and promote the reuse of construction and demolition wastes.</p> <p><b>Assumptions</b> None</p> <p><b>Uncertainty</b> None</p>
	Long Term	-	-	
12. Improve Air Quality	Short Term	-/?	-/?	<p><b>Likely Significant Effects</b> Housing growth will result in increased emissions to air both during construction (e.g. due to emissions from HGV movements ad plant) and once development is complete (e.g. due to increased traffic generation).</p> <p>Development in accordance with the spatial strategy is likely to see a strong emphasis upon housing delivery within and around the main urban area and close to existing public transport links and main centres, reducing the requirement to travel by private car.</p> <p>The levels of growth proposed under both figures have been assessed as having a negative effect, albeit with some uncertainty concerning the magnitude and significance of the effects due to the uncertainties over development locations.</p> <p><b>Mitigation</b> The effects of the proposed housing growth under either figure outlined could be mitigated by the application of other Local Plan policies that seek to reduce congestion and support investment in public transport.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> The exact magnitude of effects will be dependent on the location of development at the individual site level which is currently uncertain.</p>
	Medium Term	-/?	-/?	
	Long Term	-/?	-/?	
13. Minimise flood risk and reduce the impact of flooding to people and property in York.	Short Term	-/?	-/?	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Parts of York are identified as being at significant risk of fluvial flooding. Until the quantum of development</p>

SA Objective	Housing Growth Comparison		Commentary on effects of each figure	
	DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa		
	Medium Term	-/?	-/?	<p>is agreed and location of new development is known effects are considered to be uncertain.</p> <p>However it is considered that any adverse effects will be mitigated through the implementation of NPPF compliant Local Plan policies related to flood risk and sustainable drainage. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies avoiding areas of high flood risk (greenfield sites in flood zone 3a) as Criteria 3.</p> <p>Overall the effect of the housing growth scenarios are considered to be negative / uncertain.</p> <p><b>Mitigation</b> As set out above, site selection will be informed by the Local Plan Site Selection Methodology and application of Policies related to flood risk and sustainable urban drainage.</p> <p><b>Assumptions</b> None</p> <p><b>Uncertainty</b> None</p>
	Long Term	-/?	-/?	
14. Conserve or enhance York's historic environment, cultural heritage, character and setting.	Short Term	-	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>The historic environment of the City of York is of international, national, regional and local significance. York's wealth of historic assets include: York Minster; over 2000 listed buildings; 22 scheduled monuments including the City Walls, York Castle, Clifford's Tower and St Mary's Abbey; four Registered historic parks and gardens, which include the Museum Gardens and Rowntree Park; and a large number of designated conservation areas.</p> <p>Housing growth could have an adverse effect on cultural heritage assets as a result of the direct loss of assets during construction or due to impacts on their setting during construction and once development has been completed. There may also be opportunities for housing growth to enhance the settings of heritage assets as well as access to them.</p> <p>The levels of growth provided for under the different figures is likely to have an adverse effect on local landscape and townscape character, although the magnitude of effects would be likely to be reduced through the application of the Local Plan Site Selection Methodology which identifies the need to protect environmental assess (including historic character and setting) and the implementation of other plan policies related to conserving and enhancing the historic environment.</p> <p>The level of effects associated with the different housing figures are likely to be similar to one another; although this will depend upon the selection of individual sites. However, as a basic principle the magnitude of effect is likely to be increased commensurate with the higher scale of growth under the GL Hearn figure.</p>
	Medium Term	-	-	
	Long Term	-	-	

SA Objective	Housing Growth Comparison		Commentary on effects of each figure
	DCLG Baseline Figure 867 dpa	GL Hearn Recommended Figure 953 dpa	
			<p><b>Mitigation</b> None</p> <p><b>Assumptions</b> It is assumed that the development sites which are presented at the next stage of the plan development will be subject to a Heritage Impact Appraisal to assess whether the sites and policies of the Local Plan will conserve and enhance the special characteristics of the city.</p> <p><b>Uncertainty</b> None</p>
15. Project and enhance York's natural and built landscape.	Short Term	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>The landscape includes a range of features of natural, historical, and cultural significance that contribute to the special qualities of the City of York.</p> <p>Housing growth could have an adverse effect on landscape character associated with the need to direct some development (under both figures) onto greenfield sites.</p>
	Medium Term	-	<p>Development may also affect townscape and the visual amenity of residential and recreational receptors both in the short term during construction and once development is complete.</p>
	Long Term	-	<p>Housing growth may also present opportunities to improve townscape which could have a long term positive effect on this objective.</p> <p>Both the DCLG and GL Hearn figures considered as part of this sustainability appraisal have been appraised as having a minor negative effect against this objective. However, this will need to be revisited as part of the site specific assessments.</p> <p><b>Mitigation</b> It is considered that adverse effects should be mitigated through the application of Local Plan policies related to the protection of the landscape.</p> <p><b>Assumptions</b> None</p> <p><b>Uncertainty</b> None</p>

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- 5.2.8 The GL Hearn recommended figure identifies the OAHN and forms the basis for identifying the level of housing growth which is required in accordance with the NPPF. The demographic starting point for this figure is 867 dpa (based upon the July 2016 household projections). The technical work produced by GL Hearn identifies the need for a 10% market signals (equivalent to 86 dpa) adjustment resulting in the 953 dpa figure. The SHMA technical work indicates that without this 10% uplift, this quantum of growth would support a moderate boost to affordable housing supply over the plan period.
- 5.2.9 The OAHN has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of housing in the long term (SA Objective 1).

- 5.2.10 Significant positive effects have also been identified with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*), and Objective 5 (*Help deliver equality and accessibility for all*) in the long term. This assessment is predicated on the basis that the level of growth will generate economic benefits, both associated with construction and in the longer term new housing and associated population growth will in turn support investment in services and facilities and enhance the viability of businesses in the City of York and the vitality of the City Centre as well as other centres, encouraging additional investment.
- 5.2.11 Mixed positive and negative effects were identified in relation to transport (Objective 6). This reflects the likelihood that housing development will increase traffic within the City of York but that it may also present opportunities to increase investment in transport infrastructure, and support development in the most sustainable locations, which could reduce the need to travel by private car.
- 5.2.12 This OAHN was assessed as having a minor negative effect on SA Objective 2 (*Improve the health and well-being of York's population*). Whilst there is uncertainty regarding level of housing requirements (to be identified in line with the NPPF), it was considered that the scale of growth has the potential to have both temporary adverse health impact associated with construction works, particularly where new housing development is delivered close to existing residential areas, and longer term effects when dwellings are occupied. Further adverse effects may be generated where new housing sites are located in locations identified as Air Quality Management Areas or locations which have limited accessibility to health care facilities or are remote from other social infrastructure / employment locations reducing the opportunity for walking or cycling. A detailed understanding of the potential for negative effects will be identified following the completion of individual site appraisals.
- 5.2.13 The assessment identified the potential for housing growth to have minor negative effects on a range of objectives including climate change (SA Objective 7), water (SA Objective 10), waste and resource use (SA Objective 11) and air quality (SA Objective 12). This primarily reflects the use of resources required to support housing growth and generation of waste both during construction and once dwellings are occupied as well as the potential for increased traffic and congestion. There is some uncertainty with regards to air quality (SA Objective 12). Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development, land use (Objective 9) cultural heritage (SA Objective 14) and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by housing growth.
- 5.2.14 It is likely that the negative effects identified would be lessened through the implementation of policies contained within the Local Plan which seek to protect environmental assets and to minimise/mitigate adverse effects associated with new development as well as through the appropriate location of development. In this respect, the site allocations criteria used should ensure that new housing development is directed to locations that:
- ▶ Reduce the need to travel and/or encourage the use of sustainable modes of transport;
  - ▶ Avoid adverse impacts on the City's built and natural environmental assets;
  - ▶ Avoid locations that could exacerbate existing health issues (e.g. AQMAs);
  - ▶ Make best use of previously developed land and avoid development in the floodplain;
  - ▶ Incorporate service provision where possible.

### *Comparison to the DCLG Baseline*

- 5.2.15 The DCLG baseline is based upon the projected household growth. The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour

- 5.2.16 The DCLG baseline figure has been appraised as being less likely to deliver housing requirements in line with national guidance (and would be true of any figure below that identified as the OAHN). Analysis by GL Hearn in the 2016 SHMA identified a shortfall in housing provision against previous targets. This past under delivery of housing may suggest that there is a 'backlog' of need, and lower figures suggest that this need may not be adequately met. The latest GL Hearn technical work also identified that a 'market signals' uplift is required to enable more affordable homes to be built in line with identified need. In consequence, the DCLG baseline figure does not score the significant positive that the 2017 recommended figure does in respect of housing in the long term (SA Objective 1).
- 5.2.17 No significant negative or positive effects were recorded against the DCLG baseline figure.
- 5.2.18 Given the significant positive effects identified for the 2017 recommended figure against the SA objective for housing, employment and equity of access (with a similar performance for the remaining objectives for both the GL Hearn and DCLG figures), the scale of housing delivery envisaged for the GL Hearn recommended figure would meet housing demand based on most recent population forecasts and so would be a NPPF compliant level of growth. On balance, the 2017 recommended figure is considered to perform better, in sustainability terms, than the DCLG baseline projection figure.

### 5.3 Employment Growth

- 5.3.1 The NPPF provides a clear position on the need to build a strong competitive economy. In respect of Local Plans it states at paragraph 21 and 22 of the guidance how Local Plans should support economic growth. In drawing up Local Plans, local planning authorities should:
- ▶ Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
  - ▶ Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
  - ▶ Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;
  - ▶ Plan positively for location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;
  - ▶ Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and
  - ▶ Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.
- 5.3.2 The 2014 Publication Draft Local Plan contained provision for employment land to accommodate over 13,500 new jobs over the plan period. To inform the Preferred Sites Consultation in 2016, an Employment Land Review<sup>11</sup> was prepared to provide the necessary evidence base regarding need and demand in order to give effect to the NPPF objectives outlined above. Econometric projections by Oxford Economics were applied to provide forecasts for employment land demand over the Local Plan period. These forecasts provided the starting point for determining the amount and type of employment land which is required in the Local Plan. The projections by Oxford Economics presented the following scenarios for employment growth:
- ▶ Baseline scenario forecasting a job growth of 10,500 over the period 2014-2031;

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<sup>11</sup> Employment Land Review (2016). Available to download via: [https://www.york.gov.uk/downloads/file/11247/employment\\_land\\_review\\_2016](https://www.york.gov.uk/downloads/file/11247/employment_land_review_2016) (accessed June 2017)

- ▶ Scenario 1 which was predicated on the basis of UK recovery accelerates with GVA growth increasing from 2.6% to 3.0% per annum. The scale of job growth forecast under this option was 15,400 jobs over the same period;
- ▶ Scenario 2 assumes that the UK outlook remains unchanged from the baseline but sees 20% higher growth within professional services, financial and insurance and information and communication with a 10% lower level of growth within wholesale & retail trade, accommodation and food services. The level of job growth under this option is forecast to be 11,000.

5.3.3 The economic forecasts provide the main component for quantifying the objectively assessed development needs for the economy. The economic forecasts are used to calculate floorspace and site requirements against the planning use classes.

Table 5.1 SA of Employment Growth Option Matrix

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
1. To meet the diverse housing needs of the population in a sustainable way.	Short Term	+	+	+	<p><b>Likely Significant Effects</b></p> <p>No significant effects have been identified.</p> <p>The implementation of either the baseline scenario or option 1 or 2 will assist in creating significant employment opportunities to support sustainable economic growth in York.</p> <p>Given the aims of the York Economic Strategy, delivering the level of jobs in each scenario is likely to contribute to an increase in prosperity within the City of York area. This could both increase demand for new homes and increase people’s chances of owning their own home or advancing on the property ladder.</p> <p>Overall, the employment growth options under each scenario have been assessed as having minor positive effects on this objective.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> Phasing of delivery of a mixed types of housing is aligned with the increase in employment opportunities created by the provision of employment land.</p> <p><b>Uncertainty</b> None.</p>
	Medium Term	+	+	+	
	Long Term	+	+	+	
2. Improve the health and wellbeing of York’s population	Short Term	+/-	+/-	+/-	<p><b>Likely Significant Effects</b></p> <p>No significant effects have been identified.</p> <p>Employment growth may generate minor, temporary adverse effects on health in the</p>

SA Objective	Employment Growth Options			Commentary on effects of each option
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
	Medium Term	+/-	+/-	<p>short term during construction (e.g. as a result of emissions to air from HGV movements and plant machinery). In the longer term, economic development could also adversely affect health due to, for example, emissions from operational uses or increased traffic. The significance of effect will be dependent upon the nature and scale of economic activity and its location in relation to sensitive receptors.</p> <p>The implementation of any of the three options would help to increase the amount of employment land across York and create significant employment opportunities and help to provide the conditions for sustained economic growth. There is strong evidence showing that work is generally good for physical and mental health and well-being.</p> <p>Worklessness is associated with poorer physical and mental health and well-being. Full time work generally provides adequate income, essential for material well-being and full participation in today's society. Options which increase employment opportunities are therefore also considered as having minor positive effects. Overall, the employment growth options under each scenario have been assessed as having mixed minor positive and negative effects on this objective.</p> <p><b>Mitigation</b> None</p> <p><b>Assumptions</b> None</p> <p><b>Uncertainty</b> None</p>
	Long Term	+/-	+/-	

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
3. Improve education, skills development and training for an effective workforce.	Short Term	+	+	+	<p><b>Likely Significant Effects</b> Job provision under the baseline scenario and option 1 will create training opportunities for employees and, potentially residents (e.g. through apprenticeship schemes). These options may also support the development of the City's educational institutions.</p> <p>Option 2 would also be expected to create opportunities for training, however given the focus upon supporting a higher skilled workforce this option would be expected to maximise opportunities to complement or support the City's educational institutions. This is likely to help deliver a flexible and highly skilled workforce for the future of the City. Option 2 has therefore been assessed as having a significant positive effect on this objective.</p> <p>Overall, the employment growth options under each scenario have been assessed as having minor positive effects on this objective except for Option 2 which is considered to have significant positive effects in the medium and long term.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> None.</p>
	Medium Term	+	+	++	
	Long Term	+	+	++	

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	Short Term	+	+	+	<p><b><u>Likely Significant Effects</u></b></p> <p>The baseline scenario and Option 2 would deliver an estimated 10,500 and 11,000 new jobs over the plan period. This will promote economic growth (both in the short term during construction and once development is complete), attracting inward investment and enabling the growth of indigenous businesses through associated employment land supply. Over the long term, Option 2 is considered to result in significant positive effects in light of it being in accordance with the economic priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff.</p> <p>Option 1 would deliver 4,900 additional jobs over the baseline scenario, with all sectors expected to benefit under this scenario. Increased job provision is also likely to stimulate additional growth in the construction sector associated with the provision of new / expansion of existing employment premises. Overall this option has been assessed as having a significant positive effect in the medium and long term.</p> <p>Overall, the employment growth options under each scenario have been assessed as having minor positive effects on this objective except for Option 1 which is considered to have significant positive effects in the medium and long term and Option 2, which is considered to have significant positive effects in the long term.</p> <p><b><u>Mitigation</u></b> None.</p> <p><b><u>Assumptions</u></b> None.</p> <p><b><u>Uncertainty</u></b> The extent to which job creation is locally significant will depend on the type of jobs created (in the context of the local labour market) and the recruitment policies of prospective employers.</p>
	Medium Term	+	++	+	
	Long Term	+	++	++	
5. Help deliver equality and access to all	Short Term	+	+	+	<p><b><u>Likely Significant Effects</u></b></p> <p>No significant effects have been identified.</p> <p>All three options would assist in addressing deprivation in the City. However, the</p>

SA Objective	Employment Growth Options			Commentary on effects of each option	
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs		
	Medium Term	+	+	+	<p>extent to which new employment opportunities benefit these areas will depend to an extent on the type of jobs created and the skills present in the local labour market.</p> <p>The Local Plan Site Selection Methodology identifies the need to locate development with sustainable access to facilities and service and to ensure sustainable access for transport.</p> <p>Overall, all of the options have been assessed as having minor positive effects on this objective,</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> The location of employment sites relative to areas of deprivation. .</p>
	Long Term	+	+	+	
6. Reduce the need to travel and deliver a sustainable integrated transport network	Short Term	+/-	+/-	+/-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Focusing development in accordance with the Council's spatial strategy would have positive effects on the objective as it would significantly encourage people to live in the town centres where services and facilities are more accessible thereby reducing the need to travel.</p> <p>In the short term (during construction) and once development is complete there is likely to be an increase in transport movements and associated congestion. The scale of change proposed under all three options will inevitably generate an increase in vehicles and vehicle movements above the existing baseline.</p> <p>Economic development may also present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting.</p> <p>Overall, all of the growth options have been assessed as having minor positive and negative effects on this objective.</p> <p><b>Mitigation</b> Measures should be put into effect for all options to ensure consistency with the requirements of paragraph 17 of the NPPF which identifies as a core principle of planning the active management of patterns of growth to make the fullest</p>
	Medium Term	+/-	+/-	+/-	
	Long Term	+/-	+/-	+/-	

SA Objective	Employment Growth Options			Commentary on effects of each option
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
				<p>possible use of public transport, walking and cycling, and focus significant development in locations which are, or can be made, sustainable.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> None.</p>
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects.	Short Term	-	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Economic development will result in increased emissions of greenhouse gases both during construction (e.g. due to emissions from HGV movements and plant but also from the embodied carbon in construction materials) and once development is complete (e.g. due to increased traffic generation and emissions from sites). In view of the higher levels of growth envisaged under this Option 1, emissions are also expected to be greater (although not at a level deemed to be significant). Whilst the exact magnitude of effects will be dependent on the type, design and location of economic development at the individual site level which is currently uncertain, on balance this option has been assessed as having a negative effect on this objective. Notwithstanding, economic development may present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting and associated emissions.</p> <p>Overall, the growth options under each option have been assessed as having minor negative effects on this objective in the short, medium and long term.</p> <p><b>Mitigation</b> There may be opportunities to promote and encourage sustainable modes of transport alongside new development.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> The exact magnitude of effects will be dependent on the design and location of development at the individual site level (which is currently uncertain).</p>
	Medium Term	-	-	
	Long Term	-	-	

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	Short Term	-/?	-/?	-/?	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Within a relatively small area (272 square kilometres), the York area boasts a range of sites with habitat and conservation value at international, national, regional and local levels of importance. These sites include ancient flood meadows, species-rich grasslands, lowland heath, woodlands and wetlands, which in turn are home to a variety of European protected species including bats, great crested newts, otters and other rare species such as the Tansy Beetle.</p> <p>The development of new employment land could have adverse impacts on green infrastructure, biodiversity, geodiversity, flora and fauna without appropriate safeguards or mitigation plans. Similarly new tourism or retail development could also have adverse effects on local biodiversity depending on its location and proximity to conservation sites.</p> <p>Development could have an adverse effect on biodiversity as a result of land take/habitat loss and disturbance during construction and increased recreational pressure once development is complete. It is also likely that all scenarios will require development on greenfield sites (as well as brownfield sites which may have high biodiversity value).</p> <p>It is considered that any adverse effects will be mitigated through the implementation of NPPF compliant policies related to biodiversity. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies the need to protect environmental assets (including nature conservation).</p> <p>Economic development at the level of the options presented may provide opportunities to enhance the existing, or incorporate new, green infrastructure. This could potentially have a positive or significantly positive effect on this objective by improving the quality and extent of habitats and by increasing the accessibility of both.</p> <p>The presence of Nature Conservation Sites of International importance will necessitate a Habitats Regulations Assessment in accordance with the European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') (Amendment) Regulations 2010.</p>
	Medium Term	-/?	-/?	-/?	
	Long Term	-/?	-/?	-/?	

SA Objective	Employment Growth Options			Commentary on effects of each option
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
				<p>Overall, the growth options have been assessed as having minor negative effects on this objective. However, there is the potential for significant negative effects to arise should development result in adverse effects on designated sites, although this is currently uncertain until such time as individual site appraisals have been carried out.</p> <p><b>Mitigation</b> Measures to retain and enhance features of biodiversity interest e.g. species rich grassland and hedgerows on development sites should be adopted.</p> <p><b>Assumptions</b> None of the development sites to be taken forward in the local plan will have an adverse effect on features of international importance.</p> <p><b>Uncertainty</b> The effects of development on biodiversity which will be dependent to an extent on the location of development, the nature of detailed proposals and the outcome of site specific investigation, which at this stage are uncertain.</p>

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
9. Use land resources efficiently and safeguard their quality.	Short Term	-	-	-	<p><b><u>Likely Significant Effects</u></b></p> <p>As per the housing growth assessment, the effects against this objective are largely dependent on the location of development, which at this stage is uncertain. It is expected that there is likely to be a need to accommodate some development on greenfield sites under each option, which have therefore been assessed as having a negative effect on this objective.</p> <p>The level of growth forecast for Option 1 and the emphasis upon the growth within wholesale and retail is considered likely to place additional stress upon the delivery of greenfield sites. Accordingly, and due to the likely quantum of development forecast, significant adverse effects are anticipated.</p> <p>The NPPF says that planning should “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”. The Council should encourage developers to consider whether there is previously developed land available in suitable locations for new development, rather than locating development on undeveloped land.</p> <p>Overall, all of the growth options are considered to have minor negative effects on this objective with Option 1 considered to have significant negative effects in the long term.</p> <p><b><u>Mitigation</u></b> None.</p> <p><b><u>Assumptions</u></b> It is assumed that development sites under all options would avoid development on best and most versatile land and encouraging development on previously developed land.</p> <p><b><u>Uncertainty</u></b> None.</p>
	Medium Term	-	-	-	
	Long Term	-	--	-	
10. Improve water efficiency and quality.	Short Term	-	-	-	<p><b><u>Likely Significant Effects</u></b> No significant effects have been identified.</p> <p>Economic growth will result in increased water consumption both during</p>

SA Objective	Employment Growth Options			Commentary on effects of each option	
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs		
	Medium Term	-	-	-	<p>construction and in the longer term once development is complete.</p> <p>Option 1 would result in increased water consumption to support economic growth. Water consumption under this option would be expected to be greater than under the baseline scenario or Option 2, however the adverse effects on this objective would not be expected to be significant.</p>
	Long Term	-	-	-	<p>Overall, all of the options have been assessed as having a minor negative effect against this objective.</p> <p><b>Mitigation</b> None.</p> <p><b>Assumptions</b> None.</p> <p><b>Uncertainty</b> None.</p>
11. Reduce waste generation and increase level of reuse and recycling.	Short Term	-	-	-	<p><b>Likely Significant Effects</b> No significant effects are anticipated.</p> <p>Economic growth will result in resource use, particularly during the construction of new premises. The operation of new premises will also lead to an increase in waste generation which is inconsistent with this objective. However, the implementation of other NPPF compliant local plan policies (such as 2014 Publication Draft Local Plan Policy WM1) would help to mitigate the generation of waste.</p>
	Medium Term	-	-	-	
	Long Term	-	-	-	<p>Overall, the three scenarios have been assessed as having a minor negative effect on this objective.</p> <p><b>Mitigation</b> The performance of the selected option will benefit from ensuring that recycling facilities are included in the design to ensure any waste created once the development is in operation is minimised.</p> <p>Local Plan policies should encourage the use of recycled and secondary materials in new developments and promote the reuse of construction and demolition wastes.</p> <p><b>Assumptions</b> None</p> <p><b>Uncertainty</b> None</p>

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
12. Improve Air Quality	Short Term	-/?	-/?	-/?	<p><b><u>Likely Significant Effects</u></b></p> <p>No significant effects have been identified.</p> <p>Economic development will result in increased emissions to air both during construction (e.g. due to emissions from HGV movements and plant) and once development is complete (e.g. due to increased traffic generation and emissions from sites). Depending on the nature of the business, there could be operational effects on local air quality, although any such emissions to air will be controlled by relevant environmental legislation. There could also be effects arising from an increase in vehicle use associated with the growth in employment and the associated vehicle emissions.</p> <p>It will be important to ensure that any economic development (under the three options) does not exacerbate any problems in respect of York's current Air Quality Management Areas.</p> <p>Whilst the exact magnitude of effects will be dependent on the type, design and location of economic development at the individual site level which is currently uncertain, on balance all of the options have been assessed as having a negative effect on this objective.</p> <p>Notwithstanding, economic development may present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting and associated emissions. Further, there may be opportunities to encourage sustainable modes of transport alongside new development (although this is currently uncertain).</p> <p><b><u>Mitigation</u></b> The effects of the proposed employment growth options outlined could be mitigated by the application of other Local Plan policies that seek to reduce congestion and support investment in public transport.</p> <p><b><u>Assumptions</u></b> None.</p> <p><b><u>Uncertainty</u></b> The exact magnitude of effects will be dependent on the location of development at the individual site level which is currently uncertain.</p>
	Medium Term	-/?	-/?	-/?	
	Long Term	-/?	-/?	-/?	

SA Objective		Employment Growth Options			Commentary on effects of each option
		Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
13. Minimise flood risk and reduce the impact of flooding to people and property in York.	Short Term	-/?	-/?	-/?	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Parts of York are identified as being at significant risk of fluvial flooding. New economic development could have an adverse impact on flood risk and increase the risks of flooding to people and property if inappropriately sited or if no mitigation is secured. However, until the quantum of development is agreed and location of new development is known effects are considered to be uncertain.</p> <p>However it is considered that any adverse effects will be mitigated through the implementation of NPPF compliant Local Plan policies related to flood risk and sustainable drainage. The selection of sites, through the application of the Local Plan Site Selection Methodology identifies avoiding areas of high flood risk (greenfield sites in flood zone 3a) as Criteria 3.</p> <p>Overall, the effect of the employment growth scenarios are assessed as having a negative effect on this objective although this is currently uncertain.</p> <p><b>Mitigation</b> As set out above, site selection will be informed by the Local Plan Site Selection Methodology and application of Policies related to flood risk and sustainable urban drainage.</p> <p><b>Assumptions</b> None</p> <p><b>Uncertainty</b> None</p>
	Medium Term	-/?	-/?	-/?	
	Long Term	-/?	-/?	-/?	
14. Conserve or enhance York's historic environment, cultural heritage, character and setting.	Short Term	-	-	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>Economic growth associated with any of the three options could have an adverse effect on cultural heritage assets as a result of the direct loss of assets during construction or due to impacts on their setting during construction and once development has been completed.</p> <p>The levels of growth provided for under the different options is likely to have an adverse effect on local landscape and townscape character, although the magnitude of effects would be likely to be reduced through the application of the Local Plan Site Selection Methodology which identifies the need to protect environmental assets (including historic character and setting) and the</p>
	Medium Term	-	-	-	
	Long Term	-	-	-	

SA Objective	Employment Growth Options			Commentary on effects of each option
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
				<p>implementation of other plan policies related to conserving and enhancing the historic environment.</p> <p>The level of effects associated with the different options are likely to be similar to one another; however under Option 1, faster levels of growth may be promoted within the tourism and leisure sectors (as well as other sectors). This may present opportunities to enhance cultural heritage assets and their settings although this is also considered to be uncertain at this stage.</p> <p>Overall, the options are assessed as having minor negative effects on this objective.</p> <p><b>Mitigation</b> None</p> <p><b>Assumptions</b> It is assumed that the development sites which are presented at the next stage of the plan development will be subject to a Heritage Impact Appraisal to assess whether the sites and policies of the Local Plan will conserve and enhance the special characteristics of the city.</p> <p><b>Uncertainty</b> None</p>
15. Project and enhance York's natural and built landscape.	Short Term	-	-	<p><b>Likely Significant Effects</b> No significant effects have been identified.</p> <p>The landscape includes a range of features of natural, historical, and cultural significance that contribute to the special qualities of the City of York.</p>
	Medium Term	-	-	<p>Economic growth could have an adverse effect on landscape character associated with the need to direct some development (under all options) onto greenfield sites.</p> <p>Development may also affect townscape and the visual amenity of residential and recreational receptors both in the short term during construction and once development is complete.</p>
	Long Term	-	-	<p>The three options considered as part of this sustainability appraisal have been appraised as having a minor negative effect against this objective. However, this will need to be revisited as part of the site specific assessments.</p> <p><b>Mitigation</b> It is considered that adverse effects should be mitigated through the application of</p>

SA Objective	Employment Growth Options			Commentary on effects of each option
	Baseline Scenario – 10,500 new jobs	Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs	Option 2 – Re-profiled sector growth – 11,000 new jobs	
				Local Plan policies related to the protection of the landscape.  <b>Assumptions</b> None  <b>Uncertainty</b> None

### 2017 Local Plan Policy Approach

- 5.3.4 In undertaking the consultation of the Preferred Sites in 2016, the Council identified its preference for Option 2 (*Re-profiled Sector Growth*). The council endorsed this option as it reflected the economic priorities of the Council to drive up the skills of workforce and encourage growth in businesses which use higher skilled staff. This scenario was adopted for the Publication Draft Local Plan in 2014.
- 5.3.5 To inform the 2017 Draft Local Plan Policy approach, the original 2015 Oxford Economic projections have been subject to a sensitivity test utilising the most recent econometric projections to ensure that the plan meets the demand forecast. The Council has decided to maintain Option 2 as its preferred option. The sensitivity test undertaken maintains the level of growth under this option as 11,000 new jobs.
- 5.3.6 Option 2 has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect to improving education, skills development and training for an effective workforce (SA Objective 3). This assessment of significant positive effects was predicated on the basis that delivery of this option would assist in delivering 20% higher growth (when compared to the baseline) within professional services, finance, insurance and information and communication. This option was considered likely to deliver a flexible and highly skilled workforce which would help to deliver the economic priorities of the Council.
- 5.3.7 Significant positive effects have also been identified with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*), particularly in the long term through the attraction of inward investment and enabling the growth of indigenous business, as has been experienced at York Science City. This assessment concluded that the level of growth will generate economic benefits, both associated with construction and in the longer term economic growth and associated population growth will in turn support investment in services and facilities and enhance the viability of businesses in the City of York and the vitality of the City Centre as well as other centres, encouraging additional investment.
- 5.3.8 Positive effects were identified in relation to housing (Objective 1), reflecting that economic growth will assist in increasing prosperity which could increase demand for new homes and increase people's chances of owning their own homes or advancing on the property ladder. Positive effects were also identified in relation to equality of access (Objective 5) with employment growth providing a potential means to address deprivation within the City and to meet the needs of rural areas.
- 5.3.9 Mixed positive and negative effects were identified in relation to health (Objective 2) and transport (Objective 6). This reflected the likelihood that economic growth may generate minor, temporary adverse effects on health both during construction and in the longer term as a result of an increase in vehicle movements and associated congestion. However, economic growth and employment opportunities are considered to be positive in terms of physical and mental well-being. Economic

development may also present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting.

- 5.3.10 Negative effects were identified with regard to climate change (Objective 7), land resources (Objective 9), water (Objective 10) and waste and resource use (Objective 11). This primarily reflects the use of resources required to support economic growth and the generation of waste, both during construction and once new commercial development is operational. Further negative effects were identified in respect of cultural heritage (Objective 14), and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by economic growth.
- 5.3.11 In accordance with the appraisal of housing growth figures, it is considered that these negative effects would be lessened through the implementation of other policies contained within the Local Plan which seek to protect environmental assets and to minimise / mitigate adverse effects associated with new development as well as through the application of the Local Plan Site Selection Methodology which is based upon the application of the following criteria:
- ▶ Criteria 1: Protecting environmental assets (including Historic Character and Setting, Nature Conservation Assets and functional floodplain);
  - ▶ Criteria 2: Protecting existing openspace;
  - ▶ Criteria 3: Avoiding areas of high flood risk (greenfield sites in flood zone 3a);
  - ▶ Criteria 4a: Sustainable access to facilities and services; and
  - ▶ Criteria 4b: Sustainable access to transport.
- 5.3.12 The application of these criteria should ensure that new economic development is directed to locations that:
- ▶ Reduce the need to travel and/or encourage the use of sustainable modes of transport;
  - ▶ Avoid adverse impacts on the City's built and natural environmental assets;
  - ▶ Avoid locations that could exacerbate existing health issues (e.g. AQMAs);
  - ▶ Make best use of previously developed land, avoiding development within the floodplain.

### *Baseline Scenario and Option 1*

- 5.3.13 The Baseline Scenario identified a requirement for 10,500 new jobs whilst Option 1 identified a requirement for an additional 4,900 new jobs over the baseline. Under Option 1, the employment level within York is expected to exceed 130,000 by 2030 with employment growth expected to average 0.7% per annum compared with 0.5% under the baseline. Within York all sectors are expected to benefit under Option 1, with wholesale and retail trade expected to enjoy the biggest gains in absolute terms, with a net additional 2,400 jobs forecast by 2031.
- 5.3.14 The baseline scenario was assessed as having no significant positive or negative effects against any of the SA Objectives. Option 1 was assessed as having significant positive effects against employment (Objective 4) in both the medium and long term. Significant negative effects were identified for Option 1 in response to land use (Objective 9). This assessment was predicated on the basis that the scale of development proposed under the Option 1 and the focus upon growth within the wholesale and retail sector has the potential to result in the need to accommodate new development on greenfield sites.
- 5.3.15 Both the Baseline Scenario and Option 1 were appraised as having similar effects to Option 2. Positive effects were identified in relation to housing (Objective 1), reflecting that economic growth will assist in increasing prosperity, which could increase demand for new homes and increase people's chances of owning their own homes or advancing on the property ladder. Positive effects were also identified in relation to equality of access (Objective 5) with employment growth providing a potential means to address deprivation within the City and meeting the needs of rural areas.

- 5.3.16 Mixed positive and negative effects were identified in relation to health and wellbeing (Objective 2). This reflects the likelihood that economic growth may generate minor, temporary adverse effects on health both during construction and in the longer term as a result of an increase in vehicle movements and associated congestion. However, economic growth and employment opportunities are considered to be positive in terms of physical and mental well-being. Mixed positive and negative effects were also identified in relation transport (Objective 6), reflecting the likelihood that employment development will increase traffic within the City of York but that economic development may also present opportunities to increase investment in transport infrastructure and could help balance housing and employment provision, reducing net commuting.
- 5.3.17 Negative effects were identified with regard to climate change (Objective 7), land resources (Objective 9), water (Objective 10) and waste and resource use (Objective 11). This primarily reflects the use of resources required to support economic growth and the generation of waste, both during construction and once new commercial development is operational. Further negative effects were identified in respect of cultural heritage (Objective 14), and landscape (Objective 15) due to the potential pressure that is likely to be placed on the City's environmental assets by economic growth.
- 5.3.18 On balance, Option 2 (*Re-profile Sector Growth*) is considered to perform better, in sustainability terms, than either the Baseline Scenario or Option 1, reflecting in particular the significant positive effects identified in respect to improving education, skills development and training for an effective workforce (SA Objective 3) and on Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*) which is considered most complementary to the economic priorities of the Council.

## 5.4 Spatial Distribution

- 5.4.1 The City of York Council requested that a commentary is provided regarding the outlined three alternatives for the spatial distribution of sites within the City. The options comprise:
- ▶ Potential allocations identified in the June 2016 Preferred Sites Consultation;
  - ▶ Potential allocations identified in the June 2016 Preferred Sites Consultation and in addition those sites identified as being surplus to requirement by the MoD;
  - ▶ Proposed allocations to support the July 2017 Executive Briefing Paper.
- 5.4.2 The Potential allocations identified in the June 2016 Preferred Sites Consultation were subject to a Sustainability Appraisal by the Council with an interim SA Report being produced. The outcomes of the 2016 assessment were presented in six areas in accordance with the Preferred Sites consultation document. The division of the city into six areas has been replicated below.
- 5.4.3 At this stage, an SA has not been undertaken of the MoD sites or those additions / amendments which form the basis of the 2017 proposals. Until the growth options for the City have been confirmed the boundaries and quantum of development at a site level has not been confirmed. An appraisal of the individual sites and discounted options will be carried out to inform the development of an interim SA Report which will inform and accompany the Draft Local Plan in summer 2017. Accordingly, for the purpose of this Technical Note, it is only possible to provide a high level assessment regarding the spatial distribution of sites which did not form part of the 2016 Preferred Sites Consultation.

Figure 5.1 Consultation Zones



5.4.4 The 2016 Preferred Sites consultation identified potential housing allocations across the City with the potential capacity of 11,567 dwellings. This figure was broadly broken down as follows:

Table 5.2 2016 Preferred Sites Consultation

Area Reference	Total Dwellings	Employment Sites
Area 1 - south west	Six sites identified with provision for 416 dwellings.	No employment sites identified.
Area 2 (south east)	Three sites identified with provision for 3,518 dwellings.	Four sites identified providing 56,180sqm of floorspace.
Area 3 (east)	One site identified with provision for 84 dwellings.	One site providing 950sqm of floorspace.
Area 4 (central)	14 sites with capacity for 2,625 dwellings.	Four sites providing up to 105,050sqm of floorspace.
Area 5 (west)	Seven sites with capacity for 1,723 dwellings.	Two sites providing 63,300sqm of floorspace.
Area 6 (north)	Five sites with capacity for 3,201 dwellings.	A single site with capacity for 3,000 sqm.

- 5.4.5 The spatial distribution of sites follows the preferred approach identified at Preferred Options stage (2013) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement, albeit ST14 which previously had a greater level of connectivity with central York is now identified (2016 and 2017) as having a buffer creating a degree of separation from the main urban area.
- 5.4.6 The SA undertaken as part of the 2016 Preferred Sites Consultation of the individual sites demonstrates how each site performed against individual environmental criteria and SA Objectives. The assessment of the 2016 preferred options broadly identified the following:
- ▶ Those housing allocations with a capacity of over 100 dwellings were assessed as having a significant positive effect against the objective to *Meet the diverse housing needs of the population in a sustainable way* (SA Objective 1) in response to providing a larger proportion of housing need for the city.
  - ▶ Significant positive effects were also recorded for a number of strategic and non-strategic housing sites against the objective for *Improving the health and well-being of York's population* (SA Objective 2), this is particularly the case for those sites with good access to services and transport routes into central York. Sites across the six areas of consultation generally score well against this objective. The exception to this assessment is ST34 (ST15 *land to the west of Elvington Way*), which as a stand-alone settlement is identified as having poor access to services and facilities and was assessed as likely to have a significant adverse effect against this objective, although given the scale of this standalone settlement (c3000 dwellings) there would be an expectation that transport links and improvement / establishment of transport infrastructure would be a requirement associated with the development of this site. Four of the employment sites are identified as having particularly significant positive effects against this objective. The positive assessments reflect the positive health benefits potentially available from development in central locations with opportunities to walk or cycle to work.
  - ▶ One housing site was identified as having likely significant negative effects with regarding to SA objective 3 (*Improve education, skills, development and training for an effective workforce*). The site (H53 land at Knaption Village is allocated for 17 dwellings) was identified as having no access to educational provision. A number of sites within Area 4 (central) were assessed as having a likely significant positive effect against this objective in light of their proximity to educational facilities. Four employment sites are identified as having significant positive effects when appraised against this objective. Two of these site are within Area 4.
  - ▶ A total of nine employment sites were appraised as having significant positive effects with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*). The assessment identified significant positive effects for those sites with the capacity to provide over 100 jobs.
  - ▶ With the exception of three sites, all housing allocations were assessed positively against Objectives 5 and 6 (*Help deliver equality and access to all* and *Reduce the need to travel and deliver sustainable integrated transport network*). A number of sites in Areas 1 (south west), 4 (central) and 5 (west) were assessed as having likely significant positive effects against these objectives due to their proximity to existing services, facilities and transport routes. Five employment sites were identified as having potentially significant positive effects against this objective, including all sites within Area 6 and five of the sites in Area 4 recorded the same assessment. Significant negative effects were recorded for ST26 (South of Elvington Airfield Business Park) in Area 2 due to existing transport connections being over 800 metres away from the site. No significant positive effects for these objectives were assessed within Area 2.
  - ▶ No significant effects were recorded against SA Objective 7 (*To minimise greenhouse gases that cause climate change and deliver a managed response to its effects*) for housing or employment sites.
  - ▶ Significant adverse effects were assessed on two housing sites (ST1 and H39) with regard to Objective 8 (*Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment*). The sites are both

identified as being within 250 metres of a Statutory Nature Conservation Site. No significant adverse effects were recorded for any of the employment sites.

- ▶ Greenfied sites were assessed as having a significant adverse effect with regard to Objective 9 (*Use land resources efficiently and safeguard their quality*). These significant effects were recorded on all sites within Area 3 (east) and Area 6 (north). Significant positive effects were recorded against this objective for 19 of housing sites. Within Area 4 (central) 12 of the 16 housing sites were appraised as having significant positive effects and three of the six sites within Area 5 (west) reflecting the use of brownfield sites for development. For the employment sites, significant negative effects were recorded for a total of six sites for Area 1 to 5 (inclusive). Significant positive effects were identified for six employment sites.
- ▶ Significant negative effects were identified on a number of housing sites across all areas against Objective 10 (*Improve water efficiency and quality*). These effects have been identified for most, but not all strategic sites reflecting the pressure on water resources associated with larger development sites but also a number of smaller housing sites. Three of the five housing sites identified in Area 6 have been appraised in this way. Significant negative effects were recorded for three employment sites against this objective. These negative scores appear to relate to proximity to existing water bodies and are therefore site specific issues which may benefit from mitigation rather than reflecting a particular spatial issue.
- ▶ Two housing sites received were identified as having a significant negative effect against Objective 12 (*Improve Air Quality*), with two sites ST5 and H56 both identified as being in Air Quality Management Areas. All of the sites receiving this assessment are within Area 4 (Central).
- ▶ Housing site ST5 (York Central) and ST32 (Hungate) were both identified as having significant negative effects on SA Objective 13 (Minimise flood risk and reduce the impact of flooding to people and property) due to the presence of some areas of flood risk within the site which will require mitigation.
- ▶ Significant adverse effects were assessed against Objective 14 (*Conserve or enhance York's historic environment, cultural heritage, character and setting*) against ST15 (Area 2), and ST9 and ST14 (both in Area 6). A single employment site ST27 (Area 2) was identified as having the potential for significant negative effects. These assessments relate to the potential for negative impacts on cultural heritage given the potential for archaeological deposits. No significant positive effects were assessed against any of the housing or employment sites against this objective.
- ▶ Significant adverse effects were assessed against Objective 15 (*Protect and enhance York's natural and built landscape*) with regard to Housing Site ST31 (Area 1), H52 and ST7 (Area 3) and Sites ST14 and ST8 (both Area 6). Employment site ST27 (Area 4) was also recorded as having the potential for significant adverse effects due to its location adjacent to the A64.

#### Potential allocations identified in the June 2016 Preferred Sites Consultation and in addition those sites identified as being surplus to requirement by the MoD.

- 5.4.7 Following the 2016 Preferred Sites Consultation the MoD identified a number of sites as being redundant and available for development. The sites identified by the MoD comprise:
- ▶ Queen Elizabeth Barracks, Strensall (Area 6);
  - ▶ Imphal Barracks, Fulford (Area 4);
  - ▶ Towthorpe Lines (Area 6).
- 5.4.8 The sites have been assessed by City of York Officers against the Local Plan Site Selection Methodology which is based upon the emerging Plan's spatial strategy. This assessment has concluded that the Queen Elizabeth Barracks and Imphal Barracks site could potentially come forward for residential development with a capacity of 623 and 769 dwellings respectfully. The

Towthorpe Lines site is considered by the Council to have greater development potential as an employment site.

- 5.4.9 None of these sites have been subject to a Sustainability Appraisal at this stage. A detailed assessment of these three sites will be undertaken by the Council to inform the preparation of an Interim Sustainability Appraisal which will be published alongside the Draft Local Plan when it is published for consultation.
- 5.4.10 Based upon a review of the 2016 Preferred Sites and the outcome from the Sustainability Appraisal of those sites, the following high level assessments can be drawn at this stage:
- ▶ Both the Queen Elizabeth Barracks site and Imphal Barracks site have the potential for significant positive effects with regard to SA Objective 1 (*Meet the diverse housing needs of the population in a sustainable way*). The provision of a housing at Strensall may help to meet housing need in that particular location, where previously no housing sites were identified. Provision of housing on larger sites may provide greater potential for a wider range of housing to meet local needs.
  - ▶ Given its location at the edge of the City Centre, the Imphal Barracks site has the potential to deliver significant positive effects against SA Objective 2 (*Improving the health and well-being of York's population*) given its location in relation to services and facilities;
  - ▶ Depending upon the scale of employment growth, the Towthorpe site may generate significant positive effects with regard to SA Objective 4 (*Improve education, skills, development and training for an effective workforce*). The Queen Elizabeth site may result in negative effects against this objective in light of the distance between the site and the nearest primary school.
  - ▶ The Imphal development within Area 4 has the potential for an assessment of significant positive effects with regard to SA Objectives 5 and 6.
  - ▶ The Queen Elizabeth Barracks and Towthorpe sites are both identified as being in proximity to Strenshall Common Special Protection Area (SPA) and Site of Special Scientific Interest (SSSI). Accordingly, there will be a requirement for Habitats Regulation Assessment to inform their suitability for inclusion. Their proximity to this designated site will inform the assessment recorded against SA Objective 8 (*Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment*).
  - ▶ All three sites are understood to comprise brownfield sites, accordingly positive effects are likely to be assessed against SA Objective 9 (*Use land resources efficiently and safeguard their quality*).
  - ▶ An assessment against SA Objectives 3, 7, 10, 11, 12, 13, 14 and 15 will require specific information to enable the Council to appraise these sites.

### Proposed allocations to support the July 2017 Executive Briefing Paper

- 5.4.11 The spatial distribution of the sites put forward for allocation will be subject to individual site appraisals which will be reported upon in the Interim Sustainability Appraisal. In comparing the spatial distribution of sites from the Preferred Sites Consultation in 2016 and those sites which are being put forward for the Draft Local Plan consultation, the following high level observations have been made:
- ▶ Area 1 (South West) – Minor changes are proposed to the spatial distribution within this area existing residential allocations e.g. potential H2b land at Cherry Lane. No changes are proposed to any of those employment sites identified in the 2016 Preferred Sites Consultation.
  - ▶ Area 2 (South East) – Strategic Site ST15 – Land West of Elvington Lane is subject to a recommendation to increase its overall site size from 159ha at Preferred Sites Consultation to 216 ha and provide around 540 additional dwellings (increasing over the overall allocation to 3,901). The site was previously appraised as having significant negative effects with regard to SA Objectives 2, 10, 14 and 15, reflecting its remote location from existing services and

facilities, mixture of greenfield and previously developed land, proximity to Heslington Thillmire SSSI, potential for direct and indirect impacts on features of heritage importance and the impact of a freestanding settlement on the edge of York was considered to have negative landscape benefits. The scale of the development has the potential to make a significant positive contribution for meeting housing need. The quantum of development proposed is of a scale which can deliver a comprehensive scale of mitigation which can help to address and mitigate these adverse effects. The employment allocation at ST26 (Elvington Airfield Business Park) is proposed to increase in size to 15 hectares. Previously this site has been appraised as having significant negative effects with regard SA Objectives 2, 5 & 6, 9 and 10. A new employment allocation is also proposed for land north of Elvington Industrial Estate. The existing industrial estate is understood to benefit from high levels of occupancy and development of this site would assist in meeting an unmet demand for additional floorspace in this area with a positive assessment against SA Objective 2 likely. There are also proposals to include an allocation at Land to north of North Lane, Wheldrake (H28); no quantum of development has been identified.

- ▶ Area 3 (East) – No significant changes are proposed to housing or employment allocations within this consultation zone.
- ▶ Area 4 (Central) – The sites within this consultation zone are broadly assessed positively with regard to those objectives relating to housing, employment, equality, accessibility and use of land resources efficiently. The scale of development proposed within the Draft Local Plan (2017) includes the provision of the Imphal site (ST36) and extension of Site ST7 (East of Metcalf Lane) from 845 dwellings to 975 dwellings. Additional housing allocations are proposed for H12, H23 and H25 with capacity for 64 dwellings. No significant changes to employment sites within this consultation area were identified, with the removal of E5 and amendment of E11 to include provision of B1a. A greenfield site at Greenacres (1.95 hectares) is proposed for allocation in the Draft Local Plan.
- ▶ Area 5 (West) – The changes proposed within this consultation zone include a reduction in the level of housing development proposed at ST1 and ST2, reflecting proposals subject to current planning applications. An increase in development at H38 Land RO Rufforth Primary School is proposed for an additional 47 dwellings. No significant effects were recorded against this proposed allocation as part of the 2016 Sustainability Appraisal. Additional housing is proposed on two greenfield sites at Rufforth. Two proposed allocations would have the capacity to provide up to 54 new dwellings. A new employment site is proposed on greenfield land to the north of Northminster Business Park to provide an additional 20 hectares of employment land for B1a, B2 and B8 uses. The existing allocation to the south was appraised as having significant positive effects with regard to SA Objective 4 and significant negative effects with regard to Objective 9 reflecting the greenfield nature of the site. Housing allocation H57 is proposed for allocation as an employment site providing approximately 3.4 ha.
- ▶ Area 6 (North) – New sites have been identified at Queen Elizabeth Barracks and Towthope within Area 6. These sites have already been discussed as part of the MoD commentary. Strategic Site ST14; Land to the West of Wigginton Road is subject to a proposal to increase its overall site size from 55ha (1348 dwellings) to 68ha (1672 dwellings). This site was appraised in the 2016 Preferred Sites Consultation as having significant negative effects with regard to SA Objectives 9, 10 and 15. Within the 2014 Publication Draft Local Plan this site was identified as an urban extension with the development area commencing adjacent to the A1237. The establishment of a buffer zone for the 2016 PSC and 2017 allocation creates a degree of separation to the York urban area and results in this strategic site increasingly taking the form of a stand-alone settlement. A new 3 hectare employment site is proposed on a greenfield site at Stockton on the Forest.

## Summary of the Spatial Distribution options for City of York

5.4.12 The nature of changes associated with the 2017 Proposed Allocations have been summarised above. The Spatial Distribution of the proposed housing and employment allocations which are proposed for inclusion within the Draft Local Plan are considered to be in general accordance with

the spatial strategy which informed the 2014 Publication Draft Local Plan and 2016 Preferred Sites Consultation. The spatial strategy is based upon prioritising development within and / or as an extension to the urban area and through the provision of a new settlement.

- 5.4.13 The emphasis within the siting of development sites remains to prioritise a single standalone new settlement at Land West of Elvington Lane (ST15), although as noted above, the revision of site boundaries associated with Land West of Wigginton Road (ST14) have introduced a degree of separation between this Strategic Site and the main urban area of York.
- 5.4.14 The introduction of MoD sites, introduces additional brownfield development sites to accommodate both housing and employment growth and provides for a redevelopment opportunity within the main urban area of York. The sustainability credentials of the MoD sites (and other potential allocations) will need to be subject to individual site specific assessment.
- 5.4.15 The final spatial distribution of sites will be determined by the decision made with regard to the housing and employment growth figures for York.

## 5.5 Conclusions

- 5.5.1 The City of York Council is undertaking preparatory work to develop their Local Plan. An Executive Briefing Paper has been prepared that sets out the key choices for the Council with regard to the DCLG Baseline and GL Hearn Housing Figures and employment options.
- 5.5.2 To ensure that the Council can demonstrate that the 'plan' and reasonable alternatives to the plan have been appraised consistent with the requirements of the SEA Directive and relevant UK regulations, the overall spatial strategy, the housing figures, employment growth options and the proposed distribution of the strategic sites have been appraised.

### Spatial Strategy

- 5.5.3 The spatial strategy to be taken forward for the draft Local Plan is understood to accord with the approach adopted at the Publication Draft Local Plan (2014) and more recently repeated in the Preferred Sites Consultation (2016) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement.
- 5.5.4 It was assessed as having a significant positive effect on SA Objective 1 (Housing) as the anticipated scale of housing provision will mean that a range of housing could be provided (particularly affordable housing) to meet the objectively assessed housing needs of the City. This would also be expected to enhance the health and wellbeing of York's population and was assessed as having a significant positive effect on SA Objective 2 (Health). The scale and broad location of housing proposed meant that a range of dwellings and community facilities could be provided (particularly affordable housing) to meet specific needs and would have a significant positive effect on SA Objective 5 (Equality and Accessibility).
- 5.5.5 Whilst growth of the City on the scale envisaged would inevitably bring negative effects (such as greenfield land-take and increased traffic) it is anticipated that the Local Plan will contain a suite of policies that would seek to avoid, minimise or mitigate these effects.

### Housing Growth Figures

- 5.5.6 The NPPF requires that local planning authorities identify their objectively need (the OAHN), and that Local Plans translate those needs into land provision targets. Like all parts of the plan, such housing targets should be informed by robust and proportionate technical work.
- 5.5.7 For the purposes of this Technical Note we have compared the DCLG 2016 household projections (baseline) and a recommendation set out in the latest technical work by GL Hearn.
- 5.5.8 The housing numbers identified are provided to assist in the comparison of the evidence based OAHN figures rather than total amount of housing required across the plan period in line with the NPPF. In developing the overall housing need for the plan, the City Council will also need to

incorporate the other requirements of the NPPF e.g. shortfall in previous years. The NPPF compliant figure adopted for the Local Plan will need to be appraised for the Draft Local Plan.

- 5.5.9 This technical report has appraised the following figures for housing growth for the City of York:
- ▶ DCLG Baseline (2016): 867dpa – based on the July 2016 Household Projections
  - ▶ GL Hearn recommended figure (2017): 953dpa – the demographic starting point for this figure was 867 per annum (based upon the July 2016 household projections). The figure also includes a 10% adjustment to include provision for affordable housing.
- 5.5.10 The GL Hearn figure which represents the OAHN has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of housing in the long term (SA Objective 1). Significant positive effects were also identified with regard to Objective 4 (*Create jobs and deliver growth of a sustainable, low carbon and inclusive economy*), and Objective 5 (*Help deliver equality and accessibility for all*) in the long term. This assessment is predicated on the basis that the level of growth will generate economic benefits, both associated with construction and in the longer term new housing and associated population growth will in turn support investment in services and facilities and enhance the viability of businesses in the City of York and the vitality of the City Centre as well as other centres, encouraging additional investment.
- 5.5.11 No significant negative or positive effects were recorded against the DCLG baseline figure.
- 5.5.12 The 2017 recommended figure is considered to perform better, in sustainability terms, than the DCLG baseline projection figure. In addition the scale of housing delivery envisaged for the GL Hearn recommended figure would meet housing demand based on most recent population forecasts and so would be a NPPF compliant level of growth.

## Employment Growth Options

- 5.5.13 Three options for employment growth for the City of York have been appraised:
- ▶ Baseline scenario forecasting a job growth of 10,500 over the period 2014-2031;
  - ▶ Scenario 1: The scale of job growth forecast under this option was 15,400 jobs over the same period;
  - ▶ Scenario 2: The level of job growth under this option is forecast to be 11,000.
- 5.5.14 Option 2 has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect of improving education, skills development and training for an effective workforce (SA Objective 3). This assessment of significant positive effects was predicated on the basis that delivery of this option would assist in delivering 20% higher growth (when compared to the baseline) within professional services, finance, insurance and information and communication. This option was considered likely to deliver a flexible and highly skilled workforce which would help to deliver the economic priorities of the Council.

## Distribution of Development

- 5.5.15 The spatial distribution of sites follows the preferred approach identified at Preferred Options stage (2013) i.e. to prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement. The proposed allocations identified for inclusion in the 2017 Draft Local Plan, subject to confirmation of housing numbers, accord with this spatial strategy with a focus of new development within or adjoining the main urban area and with a sustainable standalone settlement proposed at Elvington Lane, however the revision of site boundaries associated with Land West of Wigginton Road (ST14) have introduced a degree of separation between this Strategic Site and the main urban area of York. Development sites which were not appraised as part of the 2016 Preferred Sites Consultation, in particular the MoD sites, include brownfield land and form part of a larger built up area and are therefore considered to be in accordance with the Spatial Strategy.

5.5.16

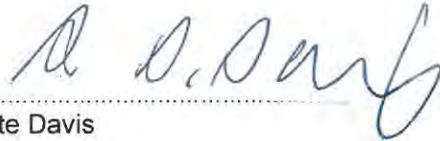
Those employment and housing sites will be subject to individual appraisal against the SA Objectives as part of a wider Interim SA Report which will accompany the draft Local Plan. An appraisal of the individual sites will only be able to commence once the Council has selected its Employment Growth Options and Housing Figure which will enable the boundaries and quantum of development to be confirmed.

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