Appendix 2: Summary of comments and responses on consultation: York Central Scoping Report

Respondent	Comment	Response/Recommended Changes
Local Development Framework	General	
Working Group	Site specific information should be added to each section of the report.	Site Specific information added for York North West area where available
	Section 1 – Introduction	
	The third bullet point of paragraph 1.2.2 should refer to identifying the key issues for York and particularly for York Central.	Bullet point added referring to York Northwest
	Section 2 – Objectives and Structure of the Scoping Report	
	Paragraph 2.1.5 should detail the research that has been undertaken and where this information can be accessed.	Details of current research projects added
	The paragraph numbering should be corrected.	Noted
	Section 3 – Integrating Sustainability Appraisal, Strategic Environment Framework	vironmental Assessment and the Local
	Paragraph 3.1.2 should reiterate the definition of sustainable development given in paragraph 1.1.2.	Definition of sustainable development added as per paragraph 1.1.2
	Section 4 – Environmental and Sustainability Context for City	of York
	No comments.	
	Section 5 – Baseline Information	
	Paragraph 5.1.2 should be amended to refer to the situation in the York Central area in particular and appropriate data on this should be provided through out the section.	Area specific information for the York North West area has been added throughout Section 5 where available and appropriate
	Consistent units of measurement should be used throughout paragraph 5.2.1.	Metric units used throughout
	Paragraph 5.2.3 created a misconception by stating that York was a relatively affluent city and should be rephrased to refer to the significant pockets of deprivation that existed.	Paragraph 5.2.3 amended to refer to pockets of deprivation within the York area

A separate sub-section should be added on incomes, including further information on average incomes to illustrate the significant number in the workforce on low incomes and the disparity between incomes for men and women.	Separate section added on incomes, including information on average income, quartiles and info for male and females and part time/full time
It should be ensured that all data included in this section was as up to date as possible.	Baseline information has been updated as new data has become available
Average house prices for the start of 2006 should be included in paragraph 5.2.19.	Land Registry House Price figures for York have been added, released 31 <sup>st</sup> October 2006
Figures given in paragraph 5.2.64, regarding the standardised mortality rate for coronary heart disease and stokes being higher than the national average, should be double checked.	Data checked
The employment and unemployment sub-section should include references to the existing employment base in York and the workforce flows into and out of York.	Information added on York's employment base from 2001 Census and 2007 estimate and figures from 2001 Census travel to work statistics on flows to and from York (paragraph 5.2.19)
Further details should be provided on travelling families in paragraph 5.2.8.	Data checked and sourced
Reference should be made to all labour resources in paragraph 5.2.10.	Paragraph 5.2.10 amended
Reference should be made to the Interim Housing needs Assessment in paragraph 5.2.21 and information in the paragraph should be updated.	Paragraph 5.2.21 amended to refer to the Interim Housing Needs Assessment, 2006.
The housing sub-section should include references to housing mix.	New paragraph added on housing mix and type analysis

A number of different headings should be included in the environment sub-section.	Sub-headings added to the environment section
Paragraph 5.2.25 should make reference to the dominance of the city centre by the Minster.	Amended to make reference to York Minster
Paragraph 5.2.27 should refer to ecology issues that are relevant to York Central.	Paragraph amended
Paragraph 5.2.29 should make reference to Holgate Beck.	Paragraph amended
Paragraph 5.2.37 should be checked and updated with reference to York Central.	Paragraph amended
Figure 6 should be printed in colour or re-formatted so that it was clear in black and white, and should relate to the text in paragraph 5.2.35.	Figure 6 will be printed in colour and is referenced in paras 5.2.56 and 5.2.57
The unit of measurement in paragraph 5.2.40 should be kilowatt hours.	Changed to kilowatt hours throughout
Paragraph 5.2.41 should include reference to the negative aspects of transport, as well as the positive.	Paragraph amended
The transport sub-section should include information which is site specific to York Central, with data from local wards.	Area specific info for York North West added where available
Paragraph 5.2.45 should explain that the current traffic levels have been achieved by parking management and promotion of alternative forms of transport.	Sentence added

The education sub-section should include site specific information on education provision, with data from local wards.	Area specific information added where available
An open space, leisure and social facilities sub-section should be added, including site specific information on current provision.	Additional sub-section added
The final sentence of paragraph 5.2.55 relating to average earnings should be included in the deprivation sub-section.	Separate section on incomes added to section 5 including average earnings
Paragraph 5.2.55 should include information on participation in the adult education programme for wards near to the York Central site.	Ward information not available
The statistics included in paragraph 5.2.72 should be appropriate to an urban area.	Figures not yet available for urban area. Info added on current research project which will provide this information for all areas of the city.
The access to services sub-section should make reference to GP's, dentists, pubs and other facilities.	As above
Section 6 – Sustainability Issues Facing City of York	
Figure 7 should include water usage efficiency, reduction of poor air quality and generation of renewable energy on site.	Amendments made to Figure 7
Section 7 – Ecological Footprint	
Paragraph 7.3.2 should begin by explaining that the eco- footprint is the best current overall objective test for ecological sustainability and that the final sentence should be rephrased to ensure that it is accurate.	Paragraph 7.3.2 amended
Paragraph 7.3.3 should be re-written to make it relevant to the York Central site specifically.	Data for York North West area not available
Eco-footprint data from 2001 should be included in paragraph 7.5.1 to allow comparison with the 2006 data.	2001 data added
The figures shown in Figure 9 should be checked and clarified.	Figures checked

Section 8 – Framework and Settings of Objectives	
An explanation should be included that Figure 11 does not indicate all of the tensions between objectives and that these will be assessed during the Sustainability Appraisal process.	Para 8.4.1 amended
In relation to objective EC3 in Figure 12, the indicator relating to % growth per annum in tourism earnings should be amended to relate to all earnings and an additional indicator relating to the growth of other jobs should be added.	Indicator to remain the same. City of York Council do not currently have the figures to be able to fully measure a new indicator. If data becomes available in the future then this can be amended.
In relation to objective S1 in Figure 12, the indicator relating to % of playgrounds meeting National Playing Fields Association (NPFA) standards should be amended to include playing fields and the indicator relating to % increase in public open space and public realm within the area should be amended to allow comparison against Local Plan standards.	S1 indicators have changed as a result of the objective being reworded.  Increase in public open space indicator added.
In relation to objective S7 in Figure 12, the sub-objective relating to promotion of a reduced modal share target should be amended to refer specifically to car usage.	S7 sub-objective amended
In relation to objective EN4 in Figure 12, an indicator should be added to measure the sub-objective relating to reduction of greenhouse gas emissions from domestic, commercial and industrial sources.	EN4 indicators amended.  CYC do you have information on gas and electricity consumption per annum.
In relation to objective EN6 in Figure 12, the sub-objective relating to renewable energy generation within the area should be amended to ensure this, rather just promote it, and the indicator relating to the Environmental Assessment Method (BREEAM) standards very good and above should be amended to relate to % of floorspace.	EN6 indicator amended. CYC do not have % of floorspace figures for BREAM yet.
In relation to objective EN7 in Figure 12, the sub-objective	EN7 sub-objective amended

	relating to provision of recycling facilities in the design of the development should be amended to ensure this, rather than just encourage it.  Section 9 – What Happens Next ?  No comments.  Section 10 – Questionnaire	
	No comments.	
EDAW on behalf of Landowner Group	Reference should be made to draft PPS 25 which updates guidance	The plan review has concentrated on issued guidance as opposed to any draft consultation PPS guidance which could be changed before publication. Reference to the draft guidance has however been added.
	PPG9 has been replaced	PPS9 has been included
	<ul> <li>Further documents should be added to plan review section</li> <li>A new deal for Transport: better for everyone White Paper (DoT)</li> <li>Quality of life counts: Indicators for a strategy for Sustainable Development for the UK (DETR)</li> <li>Directing the flow- priorities for future water policy (DEFRA)</li> </ul>	A New Deal for Transport: Better for Everyone White Paper has been superseded by The Future of Transport White Paper. This document has now been added to Figure 5.  Other documents have been added to Figure 5 and Annex 2.

Generally the baseline data provides 'comprehensive coverage of the key issues at an appropriate level'. Some additional areas should be included in the document

- Crime add indicator for car crime
- · Employment and Education

Add provision of education and employment/training facilities as a result of S106 agreement Should be a breakdown of population by occupation in baseline information and monitored as part of the SA

Construction Waste

Should include an indicator for the measurement of construction waste sent to landfill

Archaeology

Add indicator to measure number of archaeological sites destroyed or damaged as a result of development on York Central

Energy

The indicator for 'number and capacity of energy generating facilities' should also include facilities by type

Environment

Indicator should be added to measure decontamination of the land and its positive re-use

Clarification of references following from key sustainability issue, 'Reduce traffic intrusion and congestion' should be provided.

Car Theft figures included in para 5.2.81

Provision of education facilities etc. as a result of S106 agreement added as an indicator.

The Council do not currently have figures for the amount of construction waste sent to landfill.

The Council would not approve development which damages or destroys archaeological heritage so this would not be appropriate.

No renewable energy schemes to report in 05/06. However, in figure 12 the following indicator has been added: "Renewable energy capacity installed by type".

The sub indicator is already included to ensure appropriate remediation measures are undertaken and this would be dealt with by planning condition

The wording in Section 6 relating to traffic intrusion and congestion is meant to be broad as it needs to cover the whole issue. This wording is now clarified in Annex 4 to refer to this under the economic section and reference to increasing provision of access to public transport is included in the baseline description.

Clarification on 'Provide housing for all' should be provided. This should include further direction as to the intended densities required as there will be interaction between densities and the provision of transport.	It is not the purpose of the Scoping Report to provide detailed planning policy guidance. These matters will be addressed as part of the development of the Area Action Plan document.
Clarification on 'Diversify the Economy' should be provided. The opportunities York Central provides for diversifying the economy and providing for new growth should be highlighted as part of the issues, objectives and indicators.	It is considered that these issues are adequately covered in EC1 and EC3 with the sub objectives relating to York North West strengthening and diversifying economic activity, promoting tourism, science city related uses and the evening economy and indicators where available for these.
There is scope to promote the development of a vibrant and successful centre at York Central. This objective is missing from the objectives although it is identified as an issue. Need for more commentary on what is envisaged for commercial sector and increasing housing densities. Connectivity between the station and the city will be crucial to the success of York Central.	It is not the intention of the Area Action Plan to designate York Central or York North West as a separate centre to the City Centre. The area will be promoted as complementing the facilities provided in the City centre. Commentary on a commercial sector and on housing densities will be provided in the AAP. An additional sub objective relating to the need to promote connectivity has been added to S8 in Figure 12.
Overall the Scoping report is comprehensive and well written. The use of the ecological footprint to guide and measure sustainability of York Central is welcomed.	The comment is noted.

English Nature	English Nature agrees that the baseline data collected is appropriate, at the right level and appropriate coverage. English Nature also agree the key sustainability issues for the City are correctly identified. The objectives and indicators are also suitable for York Central. The inclusion of objectives to reduce the ecological footprint for York is also encouraged.	The comments are noted.
	The Lower Derwent Valley also has international designation of Special Area of Conservation.	The text in section 5 has been amended.
	The importance of the River Ouse needs further emphasis.	The text in Section 5 has been amended.
	The baseline description on biodiversity and the built environment needs to be amended in Annex 4.	The text in Annex 4 has been amended.
The Countryside Agency Landscape and Recreation	Overall we consider the Scoping Report is generally fit for purpose, closely following current Government advice on the structure, content and approach to Sustainability Appraisal. We consider all the sustainability issues to be relevant and appropriate, with all issues addressed and all data represented.	The comments are noted.
	Suggest the inclusion of an additional documents to the baseline information: Regional Environmental Enhancement Strategy for Yorkshire and Humber 2003 produced by the Yorkshire and Humber Regional Environmental Forum; and, Countryside	Environmental Enhancement Strategy for Yorkshire and Humber is included in Figure 5 and Annex 2.
	Quality Counts Indicators produced by the Countryside Agency.	Countryside Quality Counts Indicator Programme not included as it is not considered to be a key document in relation to the SA.
	Green infrastructure provision within and linking to the surrounding areas needs to be considered. This will also link into networks and connections for recreation, biodiversity and historic, cultural and landscape assets. Target should be set for maintaining and creating new and existing green infrastructure. These networks will benefit both wildlife and people including tourism economy with better access for the City of York.	Rather than setting out indicators to measure the ecofootprint, as suggested in the Scoping Report, the Council have chosen to use the Resource and Energy Analysis Programme (REAP). The text has been amended to reflect this change in approach.

Environment	The following guidance should be included	PPS25 has now been adopted.
Agency	PPS 25 Development and Flood Strategy (Draft)	11 020 has now been adopted.
, igene,	Environment Agency's Groundwater Strategy (GP3)	These documents have now been included in Figure 5 and Annex 2.
	The Agency notes and welcomes the reference to the Strategic Flood Risk Assessment being carried out by the Council. A sequential analysis should be undertaken and if it is demonstrated that there are no reasonable options in a lower risk category the Exceptions test will need to be applied and passed.	The Strategic Flood Risk Assessment is due for completion in the summer. The requirements of PPS 25 will be taken into account in the development of the AAP documents.
	The Environment Agency welcomes the sub objective relating to the need for remediation measures to deal with contaminated land.	This comment is noted.
	In the Environment section a bio diversity objective should be included as such sites can include important wildlife habitat and form part of wildlife corridors/networks.	The list of objectives (outlined in Figure 10) does include in EN3 Conserve and enhance a bio diverse attractive and accessible natural environment, which is followed through with sub objectives and indicators in Figure 12.
	The glossary of terms should include Strategic Flood Risk Assessment and PPS 25 (Draft). The annexes should also be updated to reflect any amendments in the main text.	These terms have been added to the Glossary and the annexes updated.
English Heritage	In terms of the historic environment the report has identified the majority of plans and programmes which are of relevance to the development of the Local Development Framework. It has put forward a suitable set of objectives and indicators and it has established an appropriate baseline against which to assess the plans proposals In general terms it provides the basis for the development of an appropriate framework for assessing the significant effects which the Area Action Plan might have upon the historic environment.	The comments are noted.

Figure 11 does not include the potential tension between EN2/EC3 and S10.	This table is not intended to include all potential tensions between objectives and was provided only to show how the conflicts may be tabled more fully at the next stage, the Sustainability Appraisal. It is not therefore seen as necessary to change this. The potential tensions raised are noted and will be assessed at the next stage.
English Heritage considers that an Assessment of the capacity of the historic City to accommodate further growth should be undertaken as part of the evidence base. This is the only way to ensure the protection of the special character and setting and therefore halt growth in the city. It is recommended that if the growth capacity of the City is assessed indicators could be given to assess the achievement of objectives for economic growth whilst safeguarding its important historic assets.	Considerable background study work is currently being undertaken which will inform the Local Development Documents being taken forward. The Core Strategy will be a spatial planning document which takes account of the capacity of the City to grow whilst ensuring the special historic character and environment is maintained and protected. There is no requirement in government guidance for authorities to undertake such capacity studies and given the extensive study work emerging on all relevant areas (including a Central Historic Core Conservation Area Appraisal) it is not considered necessary to undertake a specific study as suggested.
EN2 refers to the maintenance, protection and enhancement of the heritage of York. The sub objective relating to the promoting and enhancement of the NRM might be more appropriate in the economic or social objectives	It is agreed that this would be more appropriate in the economic section. The sub objective has therefore been moved to EC3, which covers economic growth and investment.
English Heritage could provide information for an indicator which covered the number of Scheduled Monuments at risk.	This has been included as an indicator for EN2.

	The first 3 indicators in EN3 relating to conservation Areas should be moved to the historic environment objective.	These indicators have been moved to EN2
	In Annex 2 the references in PPG2 to the preservation f the special character of historic towns should be identified in the table.  The indicators EN3a, EN3b and En3c in Annex 3 should be	An additional reference to this has now been included in the implications for the Plan and Implications for the SA sections. These indicators have been moved to EN2.
	moved to EN2.	
	Given the importance of the historic environment to the character of York and its contribution to the quality of life experienced and its economy annex 4 should be amended to include reference to this under Protection and enhancement of bio diversity and built environment.	Additional text has been added to refer to the built heritage. "Design and conservation issues are a very important consideration for the City of York. Much of the unique attractiveness of the City as a place to live and work and for leisure and tourism arises from its historical and cultural assets and the special relationships between its buildings, streets, squares and open spaces. This special character is equally important in the city centre and in many of the other urban areas and villages in the city. The City of York is one of only five historic centres in England that has been designated as an Area of Archaeological Importance."
	The number of Conservation Areas and Scheduled Monuments are incorrect.	The references to Conservation Areas and Scheduled Monuments have been updated.
Valerie Hastie (Resident)	No mention of the actual impacts (positive and negative) of the Council's or other major employers' activities in the City.	This comment has been noted.
	The way the document places responsibility on the individual and household is good.	This comment has been noted.
	The author generally refers to York as 'the City of York'. To make document more 'readable' could a sentence be introduced in the early stages of document, stating 'York' will be used to	Reference added into para 5.1.2 explaining City of York will be referred to as York for rest of document.

refer to the Council area of the City of York.	References to City of York throughout document changed where necessary.
Para 1.1.3 (p.1) refers to SEA. It would appear that this is first time SEA mentioned and therefore full phrase should be used.	Para 1.1.3 SEA changed to SA. SEA full phrase added later in para.
Para 3.1.1 disagree with the sentence 'The underpinning concept of sustainable development is environmental issues, upon which ultimately all social and economic rests".  Sustainable Development (SD) does not place one priority above another. Would appear SD now has 5 parameters, rather than traditional three (social, economic and environmental).  Additional two include futurity and local to global.  Para 3.1.2 disagree with definition of SD as it takes quite a narrow view. Suggest an alternative: 'economic, social and environmental goals are considered equally and in an integrated way, and the long term and global aspects of a strategy and decision making are fully considered.	Comments noted, however, the approach to sustainability in this SA Scoping Report needs to be consistent with Core Strategy SA Scoping Report. Therefore, paragraphs have been changed to reflect CYCs approach to sustainability, which has been adopted following the Core Strategy SA Scoping Report Consultation with stakeholders and members of the LDF Working Group.
3.1.3 Suggest look at the new sustainable development strategy for the UK: Securing the Future (March 2005) and Securing the Regions Futures. These documents set out the 5 new shared UK Principles which bring together and build on previous principles (set out in doc) and set out an overarching approach. Securing the Future sets out four priority areas for immediate action, which you could include.	Comments taken on board and reference made to the two documents in paras 3.1.5 and 3.1.6.
3.3.1 request rephrase from 'sustainability considerations' to sustainability principles.	Replaced phrase in line with comments.
3.3.3 request rephrase from 'sustainable development issues' to sustainable development principles	Replaced phrase in line with comments.
Section 4: strongly disagree with the title of this section. Environmental context and the sustainability context are two very different matters. Environment deals with air, land, water, waste and so on. Sustainability would include environment, social, economic, global to local and futurity issues.	Remove existing title and replace with 'Sustainability context for City of York'. Remove the word 'environmental' from the title of 4.1 and para 4.1.1.

Figure 5: The Better Quality of Life document referenced has been superseded by the Securing the Future Document.  Might also want to refer to Securing our Regions Future.  Notes Figure 5 provides comprehensive list.	Figure 5: remove reference to Better Quality of Life document, refer to Securing the Future Document instead.  Have not added in Securing our Regions' Future Document into Figure5: as document relates more to actions required at a regional level, rather than a local level.
5.2.1 note that York is to north- east of Leeds not north.	Comments noted.  Changed text to say York lies to north-east of Leeds.
5.2.4 term 'high market demand' needs clarifying. Does it refer to housing market demand, demand for building land etc.?	High market demand is meant to be a broad encompassing term and therefore no changes have been made to the text. It refers to both housing market demand, employment demand, and demand for building land.
5.2.10 author refers to Leeds as a conurbation. A conurbation is normally made up of a number of towns or cities, surely Leeds is a city rather than a conurbation.	Para 5.2.10 referring to wider Leeds urban area, rather than just the city. This includes Leeds City Centre, its suburbs and the small towns that lie in close proximity to Leeds City Centre. No changes to text therefore made.
5.2.12 One sentence in this paragraph refers to 'long term sustainability in York'. This sentence does not make sense given that one of the principles of SD is that you take a long term view. Recommend ending this sentence after the work prosperity.	Reference to long term sustainability removed.
The last sentence of para 5.2.13 should be changed twice to read 'There is also (change also to therefore) a need to invest in the city's heritage and tourist industries, its cultural sector, (add its green space), and the city centre's economy etc.	Changes to text made.
5.2.18 is it correct to say that single person households refer to	Figure refers to just single person

people who have never married? Divorced people often refer to themselves as single don't they?	households, who have never been married as per the Census definition. There is a separate figure for divorced single person households and widowed households. No changes to the text have therefore been made.
5.2.19. Regarding house prices is there a need to refer to the rest of the North Yorkshire area in the first sentence? If house prices are high why refer to a figure which show average house price in York is less than national average.  Para 5.2.19 should be rewritten to simplify	House price figures have been updated using the Land Registry Housing Figures released 31/10/06. This removes contradiction as York figure is higher than both the regional and national average.
5.2.21 refers to demand for City of York housing being for mainly rented accommodation, the implication being there is a waiting list for people to buy (as opposed to rent) social housing. Is this the correct interpretation?  Clarification is required on the definition of affordable housing.	Paragraph amended and reference to rented accommodation demand removed.  Brief definition of affordable housing included in text.
Para 5.2.29 notes the occurrence of harbour porpoises in the Ouse, which if true is excellent news.	The text has been amended to omit reference to harbour porpoise as no record has been made of this.
5.2.31. References to Selby in this para should be removed if Selby does not lie within CYC area.  Last 3 sentences of this para need clarification	Revised para 5.2.32 in light of comments
5.2.35 and 5.2.36 Repeated information on air pollution from traffic.	Revise paras 5.2.37 and 5.2.39 (formally 5.2.35 and 5.2.37).
Figure 6, when printed in black and white this figure is too small to make out any detail.	Document will be viewed in colour and will therefore be easier to understand.
Clarification is needed as to what is meant by the term resource (i.e. Resource Management)	Comment noted, heading changed to Resource Consumption and Waste.
5.2.39 In reference to recycling it is noted that 13% of the waste is recycled in the City of York. Clarification should be given as to whether waste is actually recycled within the boundaries of CYC.	Remove the phrase 'in the City of York' from sentence 2 of para 5.2.42
Paras 5.2.39 and 5.2.40 are full of numbers but don't supply the	Purpose of Section 5 is to set out the

reader with any implications relating to this information. It would be useful to explain why we have slightly higher water usage than national average and why this is important.	baseline position, rather than the potential implications of the existing situation. No changes have therefore been made to the text.
P.23 and 24. While it is clear there are traffic issues in York, the information provided on traffic issues would appear to be disproportionate to the information provided on energy issues.	There is more information on traffic as this issue is of particular relevance to York and York North West. However, there will be more information on energy issues included in the later stages of the SA, as and when this information becomes available.
Para 5.2.41. The second sentence would be stronger is terms of SD if the word 'public' was inserted between integrated transport	While it accepted that York are seeking to provide an integrated public transport system in order to improve the sustainability of the city, integration with private transport, through park and rides etc. is also encouraged as a way of improving the quality of the environment and reducing the use of the private car (thereby improving sustainability of the city). This comment has therefore been noted but no amendments made.
Para 5.2.42 The word 'private' would appear to be missing before each use of the word traffic, unless the council are seeking to reduce the level of all types of traffic. If car use decreases surely there will be an increase in bus use and the number of buses.	This paragraph refers to the aim to reduce all traffic not just private transport. No changes has therefore been made.
Para 5.2.42 The letter 'Y' is missing off the end of city.  Para 5.2.43 Needs clarification whether first sentence refers to	5th bullet of para 5.2.45 amended. Para 5.2.46: First sentence refers to all
all traffic or just private traffic. Suggests that the word 'public' should be inserted between good and transport.	traffic so its not necessary to specify type of traffic.
Para 5.2.44 Reference to the 'district' rather than the City of York area is confusing. The word district should be removed.	Para 5.2.47 replace 'the district' with York and add in new second sentence in light of

Need to explain that people living in rural areas don't have the same access to provision as city dwellers and therefore are	comment.  The word 'is' has been added.
more likely to need their own car.	
The word 'is' is missing from between which and also.	B 5040414   B14
Para 5.2.45 The use of AM and PM should be changed to morning and evening.	Para 5.2.48 AM and PM changed to morning and evening.
Paras 5.2.46 and 5.2.47 Need to keep consistency with the rest	Comments taken on board and word
of the document and use the term City of York (York) rather than district.	district changed to York. Sentence 4 of para 5.2.50- phrase 'across the district' removed.
Para 5.2.48 is not in plain English, need less figures and more interpretation.	Comments noted, however, the text has not been changed as the figures are
	deemed necessary to demonstrate the existing baseline situation.
Paras 5.2.49 and 5.2.50 presume that the casualty figures referred to relate to road traffic accidents.	Paras 5.2.52 and 5.2.53: add in reference to road traffic accidents
Para 5.2.51: expand GCSE/GNVQ and GCE/VCE to increase understanding of paragraph. Give some context to York's ranking.	GCSE etc. standard terms, which don't require expanding.
	Education information has been amended to give regional and national context to York's ranking.
Para 5.2.52 for those not in the education system it is not clear whether the level 4 referred to is a good level of achievement-needs further clarification.	Para 5.2.57 has been expanded to reflect comments.
Para 5.2.54 seems to repeat much of para 5.2.53. Is it necessary for this para to give a data source, when data sources	Source removed from para 5.2.59. This para expands on para 5.2.58, rather than
aren't given in other paras.	repeats the same statistics.
Para 5.2.55 The last sentence, written as it is, doesn't fit in this paragraph	Sentence removed.
 Para 5.2.57 this is not in plain English and doesn't add much	Comment noted. The section on

value to the document. It would provide more meaningful	deprivation has been amended.
background within the next two paragraphs.	aspirituation nad boom amonada.
Para 5.2.60 is not in plain English.	Comment noted. The section on
	deprivation has been amended.
Paras 5.2.61 to 5.5.2.68 should be put under a new heading of health	New heading added.
Para 5.2.61 Different parts of this paragraph seem to contradict each other. On the one hand York is described as an healthy city and on the other hand the third sentence talks of high rates of premature deaths from cancer.	Para amended to remove contradiction.
Para 5.2.61 and 5.2.64 appear to contradict each other. 5.2.61 refers to the high rate of premature death from cancer, whereas	Text amended to remove contradiction.
5.2.64 refers to SMR being lower than the UK average.	The term SMR has not been removed, as it
The term SMR should not be used, as it is a technical term, which makes it more difficult for the reader to understand the paragraph.	has been explained in the text and is an appropriate term to be used with the statistics given.
5.2.71 Need to check figure on the first line says 1,00 but more likely to be 1,000. This paragraph refers to previous years but it	Para 5.2.77: Figure changed to 1,000.
would be more useful to know the longer term trends.  There would appear to be no information relating to damage to	No longer term trends available currently.  Fear of crime information added into this
vehicles, damage to property or fear of crime. Fear of crime information is particularly important when thinking about sustainable communities and community safety.	section.
Para 5.2.72: in the first sentence remove the phrase "less than" and the word 'from' and replace 'from' with of.	Para 5.2.78: first sentence suggested changes made.
It would also be useful to have information on distances from GP	Additional information added into this
surgeries, regular bus services and PO.	section, in light of comments, including information on access to services in York North West area.
Para 5.2.74: A definition of 'key services' would be useful.	Para 5.2.80: definition added.
Para 6.1.1 query the phrase 'sustainability problems'	Change sentence in Para 6.1.1 to "The identification of sustainability issues is an opportunity to develop sustainable plan

	objectives and options"
Para 6.1.3 recommend that the document refers to 5 parameters of sustainability, rather than 3.	This comment has been taken on board, however, it is felt that the sustainability parameters of futurity and local-to-global, are not separate topic headings, rather they should be taken into account when looking at issues within environment, economic and social headings. No changes to the text have therefore been made.
Figure 7: Social: 3 <sup>rd</sup> bullet: could this be written to read "provide affordable and decent housing for all?" 4th bullet: remove phrase 'through creating sustainable communities' as all of the issues listed relate to sustainable communities.	Suggested amendments made.
Figure 7: Environmental: bullet 3 and 6 could be joined together. Bullet 4: could be improved if it includes a decrease in non renewable energy and an increase in generation of renewables. Bullet 5: refers to waste treatment, but it is not clear whether the author wants more or less treatment. Bullet 8: suggest removing the word 'countryside', as surely access to the natural environment and recreational activities are important whether in the town or countryside.	Bullets 3 and 6 remain separate in light of English Heritage comments. Bullet 4: add in suggested amendment. Bullet 5: change to say appropriate waste treatment, with the smallest possible environmental impact. Bullet 8: term countryside removed.
Figure 7: Economic: bullet 2 does the author mean 'sustainable as in economic growth, which is line with the 5 parameters of sustainable development, or simply long term economic growth? Bullet 3: why is traffic congestion as a stand alone phrase included here, when its already in environmental section? Bullet 4: how can York 'provide for' sustainable tourism Bullet 5: need to promote vitality of villages not just towns.	Bullet 2: author means sustainable as in economic growth. No changes made. Bullet 3: Traffic congestion has both environmental and economic consequences, therefore it needs to be included in both aspects. Bullet 4: York seek to promote sustainable tourism, by promoting opportunities to walk, cycle and use public transport to access tourism facilities and ensure that all new tourism facilities are built to high

	environmental standards. Bullet 5: 'local' added to sentence.
Section 6.0: Need to provide details regarding the positive and/or negative impacts of the issues included, particularly on areas external to York (Regional and global). The long term impact of the issues is also missing.	This comment has been noted, however, it is felt that the purpose of this section is to set out the key issues, not analyse the impacts of these issues. As noted above, the issues of Regional and global and long term impact are addressed indirectly and often they relate to the economic, environmental and social issues raised.
Para 7.1.1 claims that the previous chapter discussed the key sustainability issues facing York- not sure that it address these issues.	Chapter 6 clearly sets out the sustainability issues facing York.
Para 7.2.2 Eco-footprint is not an easy concept to grasp. It may help the reader if you put para 7.2.2 above 7.2.1.	Joined para 7.2.2 and 7.2.1 together and amended para in light of comments.
Para 7.2.3 is too complicated for this document. It is suggested that this para is rewritten or removed.	Para 7.2.2 amended to reflect comments.
General point on Eco-footprint don't think that it is explained in Section 7.0 that as useful as eco-footprints are, they don't usually include the impacts upon the environment, or social impacts.	Para 7.3.2 covers the limitations of ecological footprint analysis
7.3.1 At the end of this paragraph reference should be made to the two additional parameters of sustainable development (local to global and futurity)	This comment has been taken on board, however, as noted above and to ensure consistency in this document, it is felt that the sustainability parameters of futurity and local-to-global, are not separate topic headings and therefore no changes to the text have been made.
Para 7.3.2: This paragraph makes eco-footprint clear and understandable. Should this replace the more technical paragraph 7.2.3?	Comment noted, but appears to be more appropriate to leave this paragraph as part of a section which explores how the ecological footprint can contribute to the sustainability appraisal and what its

	limitations are.
Para 7.4.2 lacks clarity. Difficult for reader to understand.	Paragraph deleted.
Figure 8: Housing: May not be clear to readers what ECOHomes, BREAM and SAP stand for- could be helpful to write them out in full.	Figure 8 has now been deleted.
Figure 8: Energy use: need information regarding non domestic energy consumption	No information available at present on non-domestic energy consumption.
Figure 8: waste: need information regarding commercial waste.	No information available at present on commercial waste.
Para 7.5.1 An explanation of 'consumables' would be useful. 7.5.3 First bullet makes a strong point regarding the impact of the food sector- it would be interesting therefore for more information to be provided.  2 <sup>nd</sup> bullet: there is no recognition that many of York's buildings are not energy efficient simply because of their age and resulting design, this is always going to present a challenge to the city.	Text changed to reflect comment.  Bullet 1: No information available at present. Therefore, no text added.  Bullet 2 amended to reflect comment.
Figure 9: when printed out in black and white, this figure is difficult to interpret	Comment noted. Figure 9 will be printed in colour and the document will be in colour on the web site.
Para 8.1.2 Need to clarify what is meant by environmental and sustainability effects are. Using environmental and sustainability together in this way is misleading	Amended text to reflect comments.
Para 8.1.4 please recognise the 5 parameters of sustainable development	Amended text to reflect comments.
Para 8.2.1: Reference to Environmental and sustainability context should be removed. Objectives of sustainability appraisal would be improved if reference was made to Regional Sustainable Development Framework and the new UK Sustainable Development Strategy: Securing the Future.	Amended text to reflect comments. Regional Sustainable Development Framework and the new UK Sustainable Development Strategy: Securing the Future referenced in main document and in Annex 5.
Para 8.2.2: by dividing objectives into social, economic and environmental, you loose the links between them, it can be	Sentence added to para 8.2.3, which observes that there are potential positive

useful to rejoin them or to illustrate the links.	and negative impacts between difference objectives.
Para 8.2.3: Whilst it is clear that the document is quoting government guidance, caution is needed when prioritising objectives as this risks unsustainable development. Sustainable Development is based on the integration of the 5 parameters without any one of them taking priority.	Comments have been considered, but para remains unchanged, as it is necessary to comply with government guidance.
Para 8.3.4 refers to a city-vision. This vision has not been mentioned earlier.	The details of this vision are set out in Annex 2. A reference guiding the readers to this annex has been added to para 8.3.4
Figure 10: S1: Need to change wording to make it a social objective. Need to delete 'preserve and' and then insert 'access' between enhance and York's.	S1 and S6 joined together and S1 amended to make it a social rather than an environmental objective.
S6 is very similar to S1, perhaps they could be joined up?	S2 text amended to clarify objective.
S2: Lacks clarity, is the aim to maintain current levels of noise, perhaps a reduction might be better.	S8 refined to refer more directly to developments which encourage the use of public transport etc. S9 refers more to
S8 and S9, suggest these two be combined for greater impact.	strategic development by council
S10 need to insert the word 'affordable' to improve this objective.	S10 amended to reflect comment
EC1: need to add something about job opportunities relevant to the skills of York's residents.	EC1: This point is noted and will be taken forward in the Area Action Plan
EC2: If this objective includes learning opportunities for	EC2: changed in light of comments
everyone, or life long learning, it would be strengthened if it said so.	EC3: Comment taken on board, but text suggested viewed to be too specific for an objective.
EC3: This could usefully include increased investment in environmental technologies, encouraging social enterprises and	EC4: text added to clarify objective.

encouraging appropriate development.	
EC4: this would be useful if it included good quality locally grown food, health care provision, education and training. It is not clear as its written.	
Figure 11: query whether this diagram adds any value, its hard to read and if it could be read more easily then some of the 'compatibles' and 'potential tensions' would be queried.	This diagram is perceived to be the easiest way to show potential compatibles and tensions. Furthermore, an explanation of the figure is given in the text.
	This figure has been amended in light of changes to the objectives set out above.
Para 8.4.2 Sustainable construction techniques should also be encouraged.	Text amended to reflect comment
Para 8.4.3: may be useful if NO2 written out in full	NO2 written out in full
Para 8.4.4 adding the words 'as York is in the floodplain' would help provide greater context for this sentence.	Comment noted, but text not amended, as it would be misleading to say 'York' lies in a floodplain, as much of the Council area does not.
Para 8.4.5: spelling error- it should read health care, not car.	Spelling error corrected
Para 8.4.6: sustainable communities is far wider than just housing, therefore this is a misleading paragraph	Paragraph has been deleted.
Para 8.4.7 Suggest that the second sentence includes built and natural between quality and environment, so it better matches the previous sentence.	Amendment made to reflect comment
Para 8.5.3 Defra publishes sustainable development indicators which could also be useful in this process.	This comment has been noted, although no changes have been made to document, as it would appear to be appropriate to use indicators that are consistent with those used for Core Strategy SA.
Para 8.5.4: Ranking in this way is generally not consistent with sustainable development and can promote unsustainable development	This comment has been noted, although no changes have been made to document, as it would appear to be appropriate to use

	indicators that are consistent with those used for Core Strategy SA.
Figure 12- would appear to be a repeat of Figure 8	Figure 8 has been deleted.
Table under Figure 12: in the sub objective column additional useful bullets could be: increased skills in the workforce, increased educational attainment, provision of a range of part time and full time, skilled and unskilled jobs to suit the current population of the city. In the indicator column JSA should be expanded.	Would argue that increased skills in the workforce has already been identified as sub-objective.  Added increased educational attainment as a new sub objective.  In relation to provision of part time and full time jobs- feel it would be difficult to measure the success of this sub-objective.  JSA expanded.
p.49 first sub-objective doesn't make sense	Can't find the point the consultee is responding to.