

Appendix 4: Summary of comments and responses to consultation : York Northwest Scoping Report

Respondent	Comment	Response/ Recommended Changes
Natural England	Reference should be made to Character Area 28: Vale of York in Countryside Character Volume 3. A landscape appraisal should be included to assess the sensitivity, capacity and ability of the landscape to accommodate change, informed by a local Landscape character Assessment.	Figure 5 and Annex 2 will be amended to include reference to Character Area 28. A detailed landscape appraisal will be carried out as part of any proposals for the area.
	The baseline information will provide a suitable context for the assessment of this DPD	Noted.
	More detail should be given to the provision of natural greenspace for activity and access. E.g., the use of open space standards, Accessible Natural Greenspace Standards model (ANGSt).	A Study is currently being undertaken on a needs assessment of open space by PMP which will consider green corridors of open space. The ANGSt model is already included as an indicator under Objective S1.
	The scope of the issues in Figure 7 meets our objectives for sustainability. The objectives and indicators are suitable.	Noted.
	The report is generally fit for purpose, closely following current government advice on structure, content and approach to SA and SEA. The report and appendices are clearly set out and understandable.	Noted.
Environment Agency	There are no clear maps showing the boundary of the sites or detail of what is proposed making it difficult to comment on the report.	The boundary of the area has yet to be defined. It is likely that areas surrounding the two sites will also be included within the AAP boundary. However until the issues and options have been considered a decision on the extent of the area will not be made. It is too early in the process for proposals to be developed.
	It should be clarified that the sequential test should be used to assess whether there are no 'reasonably available sites' in a lower flood risk area in which to locate the proposed development. The exceptions test will have to be applied, depending on the flood risk vulnerability and the flood zone	Para 5.2.47 will be amended to reflect this.

	(see Table D3 in PPS25)	
	The further work on contamination should be undertaken with regard to PPS23 and the methodology outlined in CLR11. The River Ouse is a nearby sensitive receptor for the British Sugar development.	Additional references to this will be added to 5.2.48-5.2.53
	The remediation sub objective may be better located in EN8. Also a further sub objective under EN8 should be considered to prevent pollution from potential new contamination. A remediation sub objective may also be appropriate in the social section under S3. The number of remediation reports produced for remediated sites could be used as an indicator.	The indicator on remediation reports will be added to the objective EN7. An additional sub objective relating to pollution from new contamination will be added to EN8. However, it is considered the remediation sub objective should remain under EN7 and not in S3 or EN8.
	Support the inclusion of the biodiversity objective.	Noted.
	Inclusion of SFRA and PPS25 in the glossary is noted.	Noted.
English Heritage	The 34 designated Conservation Areas should be mentioned.	This will be added to para 5.2.54.
	The Area of Archaeological Importance and City Centre Conservation Area should be referred to.	This will be added to para 5.2.55.
	There is potential tension between EN2 and EC3/S9. These should be identified in Figure 11.	Figure 11 has been amended and this tension added to Section 8.4.
	An assessment should be undertaken of the capacity of the historic city to accommodate further growth to inform the impacts and tensions created between objectives EN2, EN1, EC3 and S9. This is the only way an assessment can be made of additional growth and the impact of this has on the special character or setting of the city. If this is seen to be harmful a halt may need to be made to the growth of the city in a certain direction or for a change in policy to protect these assets. This should be put forward as a potential mitigation measure.	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 the Central Historic Core Conservation Area Appraisal) it is not considered necessary to undertake a specific study as suggested.

	The promotion and enhancement of the NRM is a more tourist related objective and as it is included in EC3 should be deleted from EN2.	This sub objective is deleted in EN2 and only now included in EC3.
	EN2 should state those elements which have been defined as being central to the 'special character of the City' and be monitored. This would aid understanding of whether the objectives of economic growth whilst safeguarding its important historic assets is being achieved.	EN2 already outlines in the sub objective the need to preserve, promote and enhance local culture and heritage with specific mention of listed buildings, Conservation Areas, historic parks and gardens and other features and their settings. It is not considered necessary to add further indicators into this objective.
	An assessment should be made of the implications of the latest RSS.	An update following the release of the EIP report on the RSS will be added to Annex 2.
	Indicators relating to library visits and visits to museums/galleries should be moved to Objective S1	The 3 sub objectives relating to cultural facilities and associated indicators will be moved to S1.
	Reference should be made to PPG2 in Annex 5	Noted and now included.
Yorkshire Forward	Figure 5 should be amended to refer to the adoption of the Regional Economic Strategy in July 2006.	Comment noted, Figure 5 and Annex 2 will be amended.
	Additional objectives to reflect the aims of the Investment Plan for York and North Yorkshire (2004-2009) and the Regional Economic Strategy are suggested. For example, 'Increase the number of businesses in high growth sectors and further develop high value added tourism, IT, digital and creative sectors within the Northwest of the City'.	An additional sub objective will be added to EC3 and Annex 3.
	Affordable housing should be included within the economic objectives as well as the social objectives. This could include within the sub objectives 'to seek to improve accessibility to employment opportunities, which could incorporate the provision of affordable housing and public transport infrastructure'	An additional sub objective and indicator has been included in EC1 to reflect this.
Rapleys (on behalf of Associated British Foods)	Further clarification is sought on the term 'Headline objective'. Concern is raised that this is to be given greater weight than other objectives and thus whether it prejudices the relevance and importance of site considerations.	The Headline objective is the overarching aim. The objectives within this are not weighted. Para 7.4.1 on page 46 states that the ecological footprint will be used as a target with the 3 strands of sustainability giving an

		integrated measure for this.
	The report should more clearly define how the ecological footprint is to be measured. There does not appear to be any explanation of the REAP method.	Explanation of REAP method added to text – Para 7.5.4 to 7.5.8 added to provide fuller explanation of the REAP tool.
	A clearer indication of the indicators to be used, the sources of measurements, the weightings between indicators and the method to be applied in the ecological footprint section is needed. In its current form the report is unclear and it is not possible to assess the implications of the proposed approach.	A full description of the REAP model is set out in the publication “The REAP model explained”, which gives detail on the data sources used. A technical overview of the REAP methodology is outlined in REAP Technical Report 2, The use of Input and Output Analysis in REAP to allocate Ecological footprints to final consumption. The text has been amended to refer to both of these documents and to give a more detailed analysis of how the REAP tool will be used and what measurements and indicators it includes.
	There is no evidence of the use of REAP in the way proposed here nor of its effectiveness in this application. It is important for the methodology and these associated issues to be more explicitly set out at this stage.	Paragraphs 7.5.8 to 7.5.11 have been added to the report to illustrate how the REAP tool and the ecofootprint have been used at both the regional and local level.
	The objectives should more explicitly refer to economic viability. Achieving sustainable development necessarily requires consideration of relevant market conditions and their implications for the viability of development proposals. Economic viability is directly relevant to the relative sustainability of policy options and is incorporated into the government’s guidance.	The aim of the Scoping report is to provide a framework for the Sustainability Appraisal. This effectively looks at the economic, social and environmental impacts of options. The economic aspects of sustainability considerations centre on promotion of employment opportunities and economic growth. The viability of options will be a critical consideration and will be assessed as part of the feasibility considerations in the overall assessment of options as part of the Area Action Plan process. Financial considerations will be very important - the AAP will need to be realistic and deliverable to pass the tests of soundness. We will therefore carry out technical and financial feasibility work between the issues and options and the preferred options stage. It is not therefore considered appropriate to include

		<p>either an objective or any indicators relating to economic viability in this Scoping Report for the Sustainability Appraisal, as this will be a key part of the testing of options before we get to a preferred approach.</p>
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