

YORK

CITY OF YORK
LOCAL PLAN
Sustainability Appraisal
Publication Draft
Regulation 19 Consultation
February 2018



City of York Council

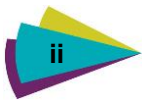
City of York Local Plan Publication Draft (Regulation 19 Consultation)

Sustainability Appraisal Report



February 2018

Amec Foster Wheeler Environment
& Infrastructure UK Limited



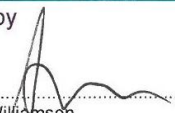
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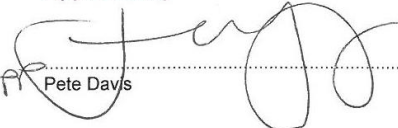
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Document revisions

No.	Details	Date
1	Draft to client	14/02/18
2	Final report	20/02/18



Non-Technical Summary

Purpose of this report

This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) of the City of York Local Plan Publication Draft (Regulation 19 Consultation). The Council, with support from Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler¹), has undertaken a Sustainability Appraisal (SA) of the Local Plan Publication Draft (Regulation 19 Consultation) to help integrate sustainable development into the emerging Local Plan.

The following sections of this NTS:

- ▶ provide an overview of the Local Plan Publication Draft;
- ▶ describe the approach to undertaking the SA of the Local Plan Publication Draft;
- ▶ summarise the findings of the SA of the Local Plan Publication Draft; and
- ▶ set out the next steps in the SA of the Local Plan Publication Draft.

What is the Local Plan Publication Draft?

The new Local Plan for the City of York will be a single planning policy document. It will set out how much new development is to be accommodated in the District to 2033 (defining Green Belt boundaries until 2038) and set out where this growth will be located. It will also contain planning policies and land allocations.

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. Following the publication of the National Planning Policy Framework (NPPF) in March 2012 and the (partial) revocation of the Regional Strategy (the Yorkshire and Humber Plan) in 2013, the Core Strategy was withdrawn from the examination process in order to produce a Local Plan compliant with new national planning policy. In 2013 the Council published the Local Plan Preferred Options, which set out the preferred approach to development in the City of York area. Following further refinement, a Publication Draft Local Plan was prepared by Council officers and reported to the Local Plan Working Group (LPWG) and Executive in September 2014. A motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken. Following further technical work related to housing and employment growth, the Preferred Sites Consultation was published in 2016. This was revised in light of sub-national housing projections, which affected the underlying baseline evidence in relation to housing need, and sites being brought forward for release by the Ministry of Defence in 2016 leading to the consultation on the Local Pre-Publication Plan in 2017. The Council has revised the emerging plan in light of consultation responses and further technical work. This is reflected in the Local Plan Publication Draft which is being made available for representations on its content between **21st February** and **4th April 2018**.

The Local Plan Publication Draft includes the following key parts:

- ▶ Vision and Outcomes;
- ▶ Key Development Principles;
- ▶ Spatial Strategy; and
- ▶ Thematic Policies.

¹ Amec Foster Wheeler Environment and Infrastructure UK Ltd's parent company Amec Foster Wheeler plc was acquired by John Wood Group plc in October 2017. Services continue to be provided under the name Amec Foster Wheeler Environment and Infrastructure Ltd and therefore, for the purposes of this Report, the company is referenced from here on as Amec Foster Wheeler.

Further information about the Local Plan Publication Draft and the development of the Local Plan is set out in Section 1.3, 1.4 and Section 2 of the SA Report and is available via the Council’s website: www.york.gov.uk/localplan.

What is Sustainability Appraisal?

National planning policy² states that local plans are key to delivering sustainable development. Sustainable development is that which seeks to strike a balance between economic, environmental and social factors to meet the needs of the present without compromising the ability of future generations to meet their own needs. It is very important 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 Sustainability Appraisal (SA) of the Local Plan³. SA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised and also incorporates a process set out under a European Directive⁴ and related UK regulations⁵ called Strategic Environmental Assessment (SEA). 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. SA will therefore be an integral part of the preparation of the Local Plan.

There are five key stages in the SA process which are shown in **Figure NTS.1**.

What Has Happened So Far?

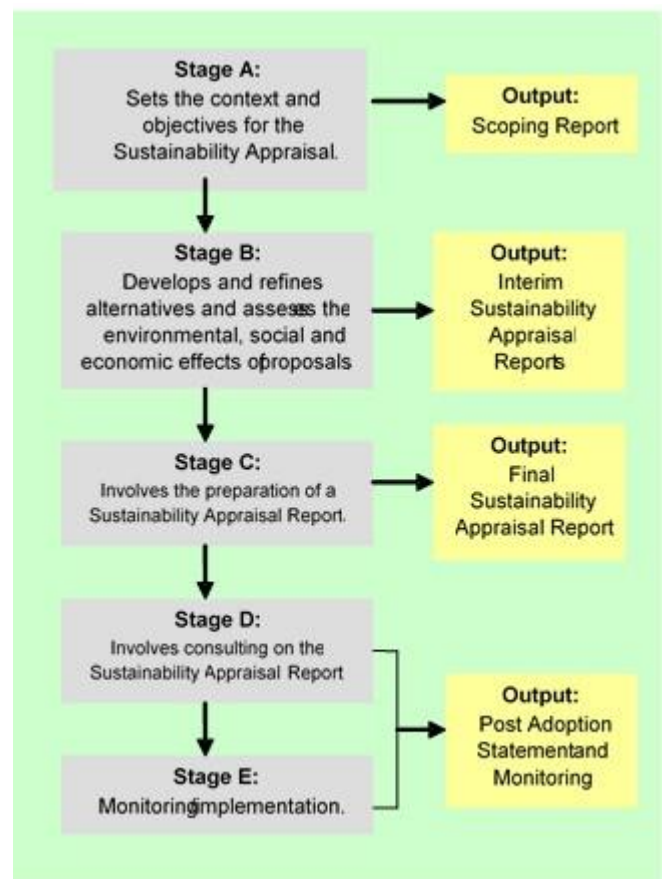
The first stage (**Stage A**) of the SA process involved consultation on a SA Scoping Report. The Scoping Report set out the proposed approach to the appraisal of the Local Plan including a SA Framework and was subject to consultation in 2013.

Stage B is an iterative process involving the appraisal and refinement of the Local Plan with the findings presented in interim SA Reports. In this context, the Preferred Options (2013), Preferred Sites Consultation (2016) and Pre-Publication Draft (2017) were assessed using the revised SA Framework and the findings presented in SA Reports consulted on alongside the documents.

The preparation of this SA Report to accompany the Local Plan Publication Draft (Regulation 19) fulfils **Stage C** whilst making it available for consultation alongside the draft Local Plan itself, prior to submission to the Secretary of State for consideration by an independent planning inspector, fulfils **Stage D**.

Following Examination in Public (EiP), the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the Local Plan. During the period of the Local Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

Figure NTS.1 The SA Process



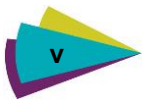
Section 1.5 of the SA Report describes in further detail the requirement for SA of local plans and the SA process including its relationship with the preparation of the Local Plan for the City of York.

² See paragraph 150-151 of the National Planning Policy Framework (Department for Communities and Local Government, 2012).

³ The requirement for SA of local plans is set out under section 19(5) of the Planning and Compulsory Purchase Act 2004.

⁴ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

⁵ Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).



How has the Local Plan Publication Draft Been Appraised?

To support the appraisal of the emerging Local Plan, a SA Framework has been developed. This contains a series of sustainability objectives and guide questions that reflect both the current socio-economic and environmental issues which may affect (or be affected by) the Local Plan and the objectives contained within other plans and programmes reviewed for their relevance to the SA and Local Plan. The SA objectives are shown in **Table NTS 1**.

Table NTS 1 SA Objectives Used to Appraise the Local Plan Publication Draft

SA Objective
1. To meet the diverse housing needs of the population in a sustainable way.
2. Improve the health and wellbeing of York's population
3. Improve education, skills development and training for an effective workforce
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy
5. Help deliver equality and access to all
6. Reduce the need to travel and deliver a sustainable integrated transport network
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment
9. Use land resources efficiently and safeguard their quality
10. Improve water efficiency and quality
11. Reduce waste generation and increase level of reuse and recycling
12. Improve air quality
13. Minimise flood risk and reduce the impact of flooding to people and property in York
14. Conserve or enhance York's historic environment, cultural heritage, character and setting
15. Protect and enhance York's natural and built landscape

The Local Plan Publication Draft vision and outcomes have been assessed for their compatibility with the SA objectives above. The Key Development Principles, Spatial Strategy policies and thematic plan policies have been appraised using matrices to identify likely significant effects on the SA objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 2**.

Table NTS 2 Scoring System Used in the Appraisal of the Draft Local Plan

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect on the SA objective.
+	The policy is likely to have a positive effect on the SA objective.
0	No significant effect / no clear link between the policy and the SA objective.



Symbol	Likely Effect on the SA Objective
I	Depends upon Policy Implementation (applied to GIS Assessments)
?	Uncertain or insufficient information on which to determine effect on the SA objective.
-	The policy is likely to have a negative effect on the SA objective.
--	The policy is likely to have a significant negative effect on the SA objective.

Proposed housing and employment land allocations including strategic sites and reasonable alternatives have been appraised against the SA objectives that comprise the SA Framework using tailored appraisal criteria and associated thresholds of significance (see **Table 5.4** of the SA Report). Reflecting their importance to the delivery of the Local Plan and capacity to generate significant effects, the proposed allocated strategic sites in the Local Plan Publication Draft and reasonable alternatives have also been subject to more detailed appraisal with the findings recorded in matrices in **Appendix I** to the SA Report.

Section 5 of the SA Report provides further information concerning the approach to the appraisal of the Local Plan Publication Draft.

What Are the Findings of the Appraisal of the Local Plan Publication Draft?

Local Plan Vision, Outcomes and Key Development Principles

The Local Plan Publication vision and outcomes have been tested for their compatibility with the SA objectives. The vision for the City of York seeks to deliver economic and social enhancements whilst protecting and enhancing the environment. Reflecting the emphasis on these three strands of sustainability, the vision and outcomes have been assessed as being compatible with the majority of the SA objectives, although the appraisal has found that it does leave room for uncertainties as potential conflicts could arise between growth, resource use and environmental factors. Where possible incompatibilities have been identified, tensions between the outcomes can be resolved if development takes place in accordance with all of the draft outcomes. As such, an incompatibility is not necessarily an insurmountable issue. The Key Development Principles were found to have a positive effect on all of the objectives with it being significant in respect of health, equality and accessibility, transport, climate change, biodiversity, flood risk, cultural heritage and landscape.

The completed compatibility assessment is presented in Section 6.2 of the SA Report. Appraisal of Key Development Principles is summarised in Section 6.3 and a matrix presented in Appendix E.

Preferred housing and employment growth options

The preferred Local Plan Publication Draft housing and employment growth options (and reasonable alternatives) have been appraised against the SA objectives. The preferred growth options are:

- ▶ Housing Preferred Option: 867 dwellings per annum (dpa) – MHCLG Baseline based on the July 2014 sub-national household projections (2016)
- ▶ Employment Preferred Option: ELR Option 2 – Re-profiled sector growth – 650 jobs per annum between 2017 and 2038 (around 13,650 over the period).

The preferred housing growth option has been found to have positive effects across a number of objectives relating to housing, education, employment. However, minor negative effects were also identified in the long term for the preferred housing figure as it only meets the CLG baseline growth rather than objectively assessed housing need (OAN) or that anticipated in Government consultations⁶. The preferred employment

⁶ MHCLG (2017) *Planning for the right homes in the right places: consultation proposals* which included an Indicative assessment of housing need for the period 2016 to 2026 for York of 1,070 dwellings per annum.

growth option has been assessed as having a positive effect across several SA objectives with a significant positive effect identified in respect to improving education and employment.

Negative effects were identified for both the preferred housing and employment growth options with regard to climate change, land resources, air quality, water and waste. 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.

The appraisal of the preferred housing and employment growth options, and the reasonable alternatives, is contained in Section 6.4 with appraisal matrices presented in Appendix N.

Spatial Strategy Policies

Policy SS1 translates the preferred growth options into policy. Policy SS1 (Delivering Sustainable Growth for York) also sets out the following five spatial principles to guide the location of this development:

- ▶ Conserving and enhancing York's historic and natural environment. This includes the City's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;
- ▶ Ensuring accessibility to sustainable modes of transport and a range of services;
- ▶ Preventing unacceptable levels of congestion, pollution and/or air quality;
- ▶ Ensuring flood risk is appropriately managed;
- ▶ Where available and viable, encouraging the re-use of previously developed land.

SS2 defines the proposed York Green Belt (SS2), the overall purpose of which is to preserve the setting and special character of York whilst assisting in safeguarding the countryside from encroachment. Other Spatial Strategy policies relate to three strategic mixed use sites and regeneration areas (SS3-SS5), strategic housing sites (SS6-SS20) and strategic employment sites (SS21-SS24).

Overall, the policies have been appraised as having a significant positive effect on those SA objectives relating to health, education and skills, economic growth, and equality and accessibility. Minor positive effects are expected against water. Mixed significant positive and minor negative effects have been assessed against housing, transport, cultural heritage and landscape. The negative effect on housing in the long term reflects that although the housing figure meets the MHCLG baseline projected growth, the figure does not include a market signals upward adjustment as proposed in the SHMA (update, 2017), the OAN or that anticipated in the MHCLG 2017 consultation 'Planning for the right homes in the right places'. Mixed minor positive and negative effects are expected against climate change, biodiversity, land use, water, waste and air quality. No cumulative significant or minor negative effects were identified during the appraisal of the spatial strategy policies.

The appraisal of the Spatial Strategy policies is summarised in Section 6.5 with appraisal matrices presented in Appendix F.

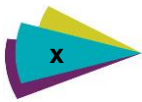
Strategic Sites

To support the delivery of the Preferred Strategic Options, a total of 21 proposed strategic site allocations are identified in the Local Plan Publication Draft and are supported by Policies SS3 to SS24. The findings of appraisal of the strategic sites against the SA objectives are presented in **Table NTS 3** and summarised below.

Table NTS 3 Summary of Strategic Sites Appraisal

Site ref	Allocation reference	Objective	SAO1: Housing	SAO2: Health		SAO3: Education		SAO4: Economy		SAO5: Equality & Accessibility		SAO6: Transport		SAO7: Climate Change		SAO8: Biodiversity		SAO9: Land Use		SAO10: Water		SAO11: Waste		SAO12: Air Quality		SAO13: Flood Risk		SAO14: Cultural Heritage		SAO15: Landscape	
		Site Name																													
295	ST1	British Sugar / Manor School	++	+	-	+	?	+		++	+	-	+	-	+	-	++	-	-	-	0	+	-	+	-						
910	ST2	Former Civil Service Sports Ground Millfield Lane	++	+	-	+	?	+		++	+	-	+	-	+	-	+	-	-	-	0	-	-	0	-						
35	ST4	East of Grimston Bar	++	+	-	+	?	+		+	-	++	+	-	-	-	-	-	-	-	0	-	-	-	-						
906	ST5	York Central	++	+	-	+	?	++		+	-	++	+	0	-	+	?	-	-	-	-	+	-	-	?	+	-				
850	ST7	East of Metcalfe Lane	++	+	-	+	?	+		+	-	+	-	+	-	-	-	-	-	-	0	-	-	-	-	-					
849	ST8	Land North of Monks Cross	++	+	-	+	?	+		++	+	-	+	-	-	-	-	-	-	-	0	0	-	0	-						
823	ST9	Land North of Haxby	++	+	-	+	?	+		+	-	+	-	0	-	-	-	-	-	-	-	-	-	-	-						
848	ST14	Land to North of Clifton Moor	++	+	-	+	?	+		++	+	-	+	-	-	?	-	-	-	-	0	-	-	-	-						
851	ST15	Land to the West of Elvington Road	++	+	-	+	?	+		++	+	-	+	-	-	?	+	-	-	-	0	?	-	-	-						
719 927	ST16	Former Terry's Chocolate Factory	++	+	-	+		+	-	++	+	-	+	-	+	0	+	-	-	-	0	+	-	+	-						

Site ref	Allocation reference	Objective	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5: Equality & Accessibility	SAO6: Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
		Site Name															
931 932	ST17	Nestle South	++	+ -	+ ?	+ -	++	+ -	+ -	+ 0	+ -	-	-	0	0	+ -	+ -
857	ST19	Northminster Business Park	0	0 -	+ -	++	0	+ -	-	? -	--	-	-	-	0	-	-
955	ST20	Castle Gateway	+ 0	+ -	+ ?	++	+ ?	++	+ -	- ?	++	-	-	+ --	--	- ?	+ -
948	ST26	South of Airfield Business Park	0	-	+ -	++	0	--	--	-	--	-	-	-	0	-	-
852	ST27	University Expansion	0	+ -	++	++	0 +	+ -	+ -	+ ?	--	-	-	-	- 0	-	- --
185	ST31	Land at Tadcaster Road	++	0 -	+ ?	+ -	+ -	+ -	+ -	-	--	-	-	-	0	- 0	-
929	ST32	Hungate	++	+ -	+ ?	++	++	+ -	--	+ -	-	++	-	-	--	--	? -- ? --
855	ST33	Station Yard Wheldrake	++	-	+ ?	+ -	++	+ -	+ -	--	+ -	-	-	-	+ -	- 0	- 0
934	ST35	Queen Elizabeth Barracks, Strensall	++	+ -	+ ?	+ --	+ -	+ -	+ -	--	+ -	-	-	-	? 0	+ -	+ -
951	ST36	Impfal Barracks, Fulford Road	++	+ +	+ ?	+ --	++	+ -	--	+ -	--	+ -	-	--	? -	? --	? --
246	ST37	Whitehall Grange	0	0 -	+ -	++	0	--	--	-	--	-	-	-	0	-	--



The strategic sites predominantly comprise housing developments with some employment allocations. Of the seventeen sites which are proposed as residential, sixteen have been assessed as having a significantly positive effect on housing due to the provision of more than 100 dwellings on site.

The majority of the sites had a mixed minor positive and minor negative, or mixed minor negative and neutral effects on Health. The positive impacts reflect that all of the sites had good provision of open space, cycling or walking links together with provision of healthcare facilities within proximity. The minor negatives reflect short-term construction noise which may affect nearby receptors and longer term disturbance as a result of occupation. Uncertainty was raised in relation to the scale of the positive impacts being dependent on the uptake of recreational activity / walking and cycling as well as the requirement for commensurate facilities to meet population needs in the future.

Similarly, sixteen of the sites also had mixed minor positive and uncertain effects on Education. These effects were identified due to provision of schools locally, particularly primary schools, as well as potential for training opportunities during the short-term as a consequence of construction. Uncertain impacts were identified where there was limited provision of education and to indicate that capacity of future educational needs is unknown. All strategic housing site appraisals recognised the need for co-ordination between developers and the Council to ensure that sufficient nursery, primary and secondary education capacity is provided and phased alongside development.

Seven of the strategic sites were assessed as having a significantly positive effect on Economy, four of which are sites that have been allocated specifically for employment purposes. ST19, ST26, ST27 and ST37 will deliver around 129,000m² of employment floorspace for a range of B uses whilst ST5, ST20 and ST32 are large city centre mixed use developments. ST35 and ST36 are recognised as having a mix of minor positive effects and significant negative effects on the Economy. The negative effects are assessed due to the loss of specialised military employment sectors at these locations within the city.

Ten of the proposed strategic sites were also assessed as having significant positive effects on Equality and Accessibility largely due to the provision of affordable housing and provision of services/facilities nearby.

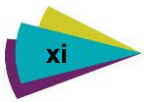
Seven sites have been assessed as having a significant positive effect on Transport reflecting the good provision of sustainable transport links such as cycle routes, park and ride, bus services and train stations although in the case of ST32 and ST36 this was mixed with significant negative effects as they will also likely to exacerbate traffic congestion. ST26 and ST37 were assessed as significant negative due to the limited transport options for using alternative modes to the car. ST26 and ST37 were similarly assessed as having a significant negative effect on climate change.

Significant negative effects were identified for five strategic sites on Biodiversity. Two of these sites have local designations within 50m whilst the remaining three sites (ST15, ST33 and ST35) were identified as potentially having adverse effects on either the Lower Derwent Valley SPA or the Strensall Common SAC. Further assessment of these potential effects is currently being undertaken.

Four sites (ST1, ST5, ST20 and ST32) were assessed as having a significant positive effect on Land use as all of these sites will involve wholly developing previously development land (Brownfield sites). Three (ST2, ST16 and ST17) had a minor positive effect reflecting their part brownfield status and evidence reflecting remediation of contamination in the case of ST16/ST17. Four sites were also identified with potential minor negative and minor positive effects where they were mixed brownfield/greenfield, some of which had potential for contamination issues. The remaining sites were assessed as having significant negative impacts given they involved developing Greenfield land and involve the loss of agricultural land.

ST20, ST32 and ST36 were identified as having potentially significant negative effects on air quality as result of transport and associated deteriorating air quality, with the latter sites also potentially negatively contributing to AQMAs. The majority of the remaining sites were identified as having a minor negative effect on air quality. Those sites with good access to alternative transport modes may offset some negative effects subject to uptake and use by residents.

Effects on SA Objective 14 (Cultural heritage) were predominantly assessed as minor negative due to potential detrimental effects on historic assets, local culture and setting, archaeology and views. However, significant negative effects were identified for ST7 due to potential interruption to views towards the Minster and on ST32 / ST36 due to their location and density of heritage assets that may be affected by development. York's rural setting also led to the majority of sites also being assessed as having minor



negative effects on landscape. Six of the strategic sites (four of which are greenfield and two have a mix of brownfield and greenfield land) were identified as having potentially significant negative effects as a result of visibility of new development and reducing the perception of York in a rural setting. ST32 was assessed as having potentially significant negative effects due to the potential impacts on the Core Conservation Area and visible historic grain of the City.

The matrices with the appraisal of the strategic sites and alternatives are presented in Appendix H, including those that have previously been subject to SA (in order to reflect the new information and/or site boundaries). Proposed potential strategic site allocations and reasonable alternatives have also been subject to more detailed assessment against the SA objectives (as reflected in Table NTS 3). The detailed appraisal matrices for each proposed site allocation and the reasonable alternatives is contained in Appendix I. A summary of the appraisal of the proposed strategic site allocations is presented in Section 6.5 of the SA Report.

Land Allocations

In addition to the 21 strategic sites, the Local Plan Publication Draft identifies a number of smaller scale (local) housing and employment land allocations, a single allocation for student housing and a single allocation for Travelling Showpeople (supported by Policies H1, EC1, ED6 and H6 respectively). The findings of appraisal of the strategic sites against the SA objectives are presented in **Table NTS 5** and summarised below.

Overall, the scale of housing and employment land to be delivered through the proposed smaller scale (local) allocations in the Local Plan Publication is considered to be significant and will help to meet the future needs of the District, its communities and businesses over the plan period whilst minimising the potential for significant adverse environmental effects. Whilst there is the potential for new development to result in adverse environmental effects (and in some cases, significant negative effects), in many cases (such as in respect of biodiversity, cultural heritage and landscape) it is anticipated that the potential adverse effects could be mitigated at the project level. In this context, the Local Plan Publication Draft policies provide mitigation against a range of site level planning matters.

Table NTS 5 Summary of Local Sites Appraisal

Call for Sites Ref	Local Plan Ref	Site Name	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
58	H8	Askham Bar Park and Ride Site	+	+	+	0	++	+	-	++	0	0	0	0	0	0
59	H22	Heworth Lighthouse	+	++	+	0	++	+	-	++	0	0	0	0	0	0
64	H55	Land at Layerthorpe and James St	+	++	++	0	++	+	-	++	0	0	I	-	0	0
83	H53	Land at Main Street, Knapton	+	+	--	0	+	0	0	--	0	0	0	0	0	0
95	H39	North of Church lane Elvington	+	+	+	0	+	+	--	--	0	0	0	0	0	0
98	H23	Grove House EPH	+	++	++	0	++	+	0	++	0	0	I	0	-	0
124	H20	Oakhaven EPH	+	++	+	0	++	+	0	++	0	0	0	0	0	0
127	H5	Lowfields former school site	++	++	++	0	+	+	0	+/-	0	0	0	0	-	-
166	H29	Land at Moor Lane	+	++	-	0	I	+	0	--	0	0	0	0	0	-
172	H7	Bootham Crescent Football Stadium	+	++	++	0	++	+	0	++	0	0	0	0	-	0

Call for Sites Ref	Local Plan Ref	Site Name	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
182	H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	++	++	++	0	+	+	-	--	0	0	0	0	-	-
472	H1	Former Gas Site 24 Heworth Green	++	++	++	0	++	+	-	++	0	0	-	-	-	0
656	H10	Barbican Centre	++	+	+	0	++	+	0	++	0	0	-	0	-	0
677	H38	Land RO Rufforth Primary School	+	+	+	0	+	+	0	--	0	0	0	0	0	0
828	H56	Land at Hull Road	+	++	++	0	++	+	0	+/-	0	0	0	0	-	0
832	H6	RO the square Tadcaster Road	0	+	+	0	++	0	0	-	0	0	0	0	-	-
853	H3	Revised Burnholme School	+	++	+	0	+	+	0	+/-	0	0	0	0	0	0
930	H31	Eastfield Lane Dunnington	+	++	-	0	+	+	0	--	--	0	0	0	0	0
936	H59	Queen Elizabeth Barracks Strensall – Howard Road, Strensall ⁷	+	+	+	0	I	+	-	+/-	0	0	0	-	0	-

⁷ Site H59 Queen Elizabeth Barracks Strensall – Howard Road, Strensall is adjacent to the Strategic Site ST35 but does not form part of the strategic allocation and has therefore been assessed separately as a local site allocation.

Call for Sites Ref	Local Plan Ref	Site Name	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
938	H58	Clifton Without Primary School	+	++	++	0	++	+	0	++	0	0	0	0	-	0
946	H52	Willow House EPH, Long Close Lane	+	+	-	0	++	+	-	+/-	0	0	-	0	-	0
General Employment Site Allocations																
600	E8	Wheldrake Industrial Estate	0	-	-	+		+	0	--	0	0	0	n/a	-	0
602	E9	Elvington Industrial Estate	0	++	++	++		+	0	--	-	0	0	n/a	0	0
639	E11	Annamine Nurseries	0	+	++	++	++	+	0	++	0	0	0	n/a	0	0
706	E10	Chessingham Park, Dunnington	0	++	++	+		0	--	--	0	0	0	n/a	0	0
742	E16	Upper Poppleton Garden Centre	0	+	-	++	++	+	-	++	0	0	0	n/a	0	0
925	E18	Towthorpe Lines	0	+	-	++		+	--	++	0	0	0	n/a	0	--
Traveller Showpeople Site Allocation																
22	SP1	The Stables Elvington	+	--	--	0		0	0	++	--	0	0	0	0	-
Student Housing Site Allocation																
137	SH1	Land at Heworth Croft	+	++	++	0	++	+	-	+/-	--	0		--	-	-

The appraisal of proposed land allocations, including reasonable alternatives, is contained in Appendix H. The findings of the appraisal of the proposed housing, employment, Travelling Showpeople and student housing allocations are summarised in Section 6.5 of the SA Report.

Local Publication Draft Plan Policies

To support the overall strategy for development, the Local Plan Publication Draft includes 80 policies across the following chapters:

- ▶ Economy and Retail which has nine draft policies including proposed employment land allocations;
- ▶ Housing which has ten policies including proposed housing allocations (with one site for extra care) and one site allocated for Travelling Showpeople;
- ▶ Health and Wellbeing which has seven policies;
- ▶ Education which has eight policies including proposals to support the expansion of the City's university campuses and other educational facilities;
- ▶ Placemaking, Heritage, Design and Culture which has fourteen policies;
- ▶ Green Infrastructure which has seven policies including proposals for new open space provision;
- ▶ Managing Appropriate Development in the Green Belt which has four policies;
- ▶ Climate Change which has three policies;
- ▶ Environmental Quality and Flood Risk which has five policies;
- ▶ Waste and Minerals which has two policies;
- ▶ Transport and Communication which has ten policies including proposals for strategic transport improvements;
- ▶ Delivery and Monitoring which has one policy.

The performance of the policies has been tested against the 15 SA objectives. The implementation of the proposed policies contained in the Local Plan Publication Draft is anticipated to have a cumulatively positive effect on the SA objectives. Significant positive effects are expected in respect of the following topic areas: housing; health; economy; equality and accessibility; transport; climate change; cultural heritage; and landscape. Effects on SA objectives related to education, biodiversity, land use, water, waste, air quality and flood risk, meanwhile, are also likely to be positive.

Notwithstanding, for those policies that promote/make provision for new development some negative effects on the SA objectives can be expected. In this context, the potential for negative effects has been identified in respect of SA objectives relating to climate change, land use and air quality. Where negative effects have been identified, mitigation measures have been proposed, which include the application of other policies within the plan concerning for example, biodiversity, air pollution, flood risk, sustainable design and heritage.

Detailed matrices containing the appraisal of the Local Plan Publication Draft policies are presented in Appendix J to the SA Report. The findings of these appraisals are summarised in Section 6.6 of the SA Report.

Cumulative Effects Arising From the Draft Local Plan

The findings of the appraisal of the cumulative effects of the Local Plan against the SA objectives are presented in **Table NTS 6** below. Significant positive effects are expected in respect of the following topic areas: health; education; economy; equality and accessibility; transport; climate change; cultural heritage; and landscape. A mix of significant positive and minor negative effects are expected for housing. Effects on

SA objectives related to land use, water, waste, air quality and flood risk, meanwhile, are likely to be positive. Effects on biodiversity are largely positive but minor negative effects have also been assessed.

Despite the overall positive cumulative effects identified, some cumulative negative effects on the SA objectives are likely to arise as a result of the implementation of the draft Local Plan. The potential for negative effects has been identified in respect of climate change (principally due to increased greenhouse gas emissions associated with housing and economic growth), land use (due to the anticipated loss of greenfield land, including ‘best and versatile’ agricultural land) and air quality (due to increased emissions to air from vehicle movements).

Table NTS 6 Summary of Cumulative Effects of Local Plan Policies

SA Objective	Policy Chapters														Cumulative effect of the draft policies
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring	
1. Housing	++	++/-	+	++/-	++	++	+	+	0	+	+	0	0	+	++/-
2. Health	++	++	+	++	++	++	+	++	+	+	++	+	++	+	++
3. Education	+	++	+	0	0	++	0	+	0	0	0	0	+	+	++
4. Economy	+	++	++	+	0	++	0	+	0	++	0	+	+	+	++
5. Equality	++	++	++	++	++	+	+	++	+/?	+	+	0	+	+	++
6. Transport	++	++/-	++	+	+	++	++	++	+	0	0	+	++	+	++
7. Climate Change	++	+/-	+/-	0/-	+	+	0	++	+	++	++	+	++	+/-	++/-
8. Biodiversity	++	+/?	?	0	+	+	++	++	+	0	+	++	0	+	+/-
9. Land Use	+	+/-	+	+/-	+	+/?	0	++	+	0	++	+	+	+	+/-
10. Water	+	+	0	0	0	?	0	+	0	+	++	0	0	+	+
11. Waste	+	+/-	+	+/-	0	?	+	0	0	+	0	++	0	+	+/-
12. Air Quality	+	+/-	-	-	+	+	0	++	0	+	++	+	++	+/-	+/-
13. Flood Risk	++	0/?	0	0	0	0	+	++	+	0	++	+	0	+	+
14. Cultural Heritage	++	++/-	?	+	+	+	++	++	++	0	+	+	++	+	++

SA Objective	Policy Chapters														Cumulative effect of the draft policies
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring	
15. Landscape	++	++/-	?	+/?	0	+	++	++	++	0	+	+	++	0	++

A detailed matrix containing the cumulative appraisal of the Local Plan Publication Draft policies with commentary is presented in Table 6.4 of the SA Report. The findings are summarised in Section 6.7 of the SA Report.

Mitigation and Enhancement

The appraisal contained in the SA Report has identified a range of measures to help address potential negative effects and enhance positive effects associated with the implementation of the Local Plan Publication Draft. These measures are highlighted within the detailed appraisal matrices to the SA Report and will be considered by the Council in refining the emerging Local Plan.

Next Steps

This NTS and the SA Report are being issued for consultation alongside the Local Plan Publication Draft (Regulation 19 Consultation). The consultation will run from **21st February** until **4th April 2018**.

The findings of the SA Report, together with consultation responses and further technical work, will be used to help refine the emerging Local Plan leading up to the submission of the Local Plan which is due to take place in Summer 2018. The submitted Local Plan will be accompanied by a SA Report.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of this NTS or SA Report.

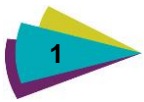
Please provide your comments by midnight on 4th April. Your comments should be made using a response form available to complete online via York Council's website:

www.york.gov.uk/localplan

You can also download a response form and return to:

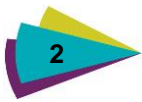
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1. Introduction

1.1 Overview

- 1.1.1 The City of York Council is currently preparing a new Local Plan for the City of York. The Local Plan will set out the vision, objectives, planning policies and site allocations that will guide development in the District to 2033 (and Green Belt until 2038). The City of York Council is publishing the Local Plan Publication Draft (Regulation 19 Consultation) to allow representations to be made on its content between **21st February** and **4th April** 2018.
- 1.1.2 The Council, with support from Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler⁸), has undertaken a Sustainability Appraisal (SA) of the Local Plan Publication Draft. The SA appraises the environmental, social and economic performance of the Local Plan Publication Draft against a set of sustainability objectives in order to identify the likely significant social, economic and environmental effects. Where appropriate, the SA has highlighted areas where measures to avoid, minimise or mitigate any potential negative effects could be required. Similarly, and where appropriate, opportunities to enhance the contribution that the Local Plan Publication Draft could make to sustainability have also been identified.
- 1.1.3 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 including in respect of earlier work on the Core Strategy. More specifically, SAs have been undertaken of the following:
- ▶ Core Strategy Issues and Options 1 (2006);
 - ▶ Core Strategy Issue and Option 2 (2007);
 - ▶ Core Strategy Preferred Options (2009);
 - ▶ Core Strategy Submission (Publication) (2011);
 - ▶ Local Plan Preferred Options (2013);
 - ▶ Further Sites Consultation (2014);
 - ▶ Local Plan Publication Draft (2014);⁹
 - ▶ Preferred Sites Consultation (2016); and
 - ▶ Local Plan Pre-Publication Draft (Regulation 18 Consultation) (2017).
- 1.1.4 A Publication Draft Local Plan was recommended to the City of York Council for publication in September 2014. The draft Plan was subject to a full SA Report prepared by AMEC (now Amec Foster Wheeler). A report was presented to the Local Plan Working Group (LPWG) and Executive in September 2014. However, the Council approved a motion to halt consultation on the Publication Draft and prepare new evidence relating to the levels of growth in October 2014. Since 2014 the Council has undertaken further consultation and technical work. The outcome of this work is reflected in the Local Plan Publication Draft.
- 1.1.5 This report presents the findings of the SA of the Local Plan Publication Draft. Where applicable, reference is made to the findings of the 2014 SA Report undertaken by AMEC and the City of York Council; the Preferred Sites Consultation Interim SA Report prepared by the City of York Council in

⁸ Amec Foster Wheeler Environment and Infrastructure UK Ltd's parent company Amec Foster Wheeler plc was acquired by John Wood Group plc in October 2017. Services continue to be provided under the name Amec Foster Wheeler Environment and Infrastructure Ltd and therefore, for the purposes of this Report, the company is referenced from here on as Amec Foster Wheeler.

⁹ The publication draft was not published for consultation.

2016; and the 2017 SA Report into the Local Plan Pre-Publication Draft (Regulation 18 Consultation) prepared by City of York Council and Amec Foster Wheeler.

1.2 Purpose of this SA Report

- 1.2.1 This SA Report supports the ongoing development and refinement of the City of York Local Plan by appraising the sustainability strengths and weaknesses of the Council's proposed housing and employment growth figures, spatial strategy, development principles, policies and proposals that comprise the Local Plan Publication Draft. The SA Report forms one of the documents that must be published alongside the Local Plan itself during the statutory period for formal representations (under Regulation 19). The SA process helps promote sustainable development through the integration of sustainability considerations into the preparation of the Local Plan and selection/refinement of options. More specifically, this SA Report sets out:
- ▶ an overview of the Local Plan for the City of York;
 - ▶ a review of relevant international, national, regional, sub-regional and local plans, policy and programmes;
 - ▶ baseline information for the City across key sustainability topics;
 - ▶ key economic, social and environmental issues relevant to the appraisal of the Local Plan
 - ▶ the approach to undertaking the appraisal of the Local Plan Publication Draft;
 - ▶ the findings of the appraisal of the Local Plan Publication Draft and the reasons for selecting the Spatial Strategy and for the rejection of reasonable alternatives; and
 - ▶ conclusions and an overview of the next steps in the SA process including an initial monitoring framework.
- 1.2.2 SA is an iterative process and this SA Report has been completed to support the consultation on the Local Plan Publication Draft. This SA Report will be revised and updated to reflect any changes in the draft Local Plan that arise following the consultation. A SA Report will then be prepared to accompany submission of the Local Plan to the Secretary of State (under Regulation 22).

1.3 The City of York Draft Local Plan – an Overview

Requirement to Prepare a Local Plan

- 1.3.1 The National Planning Policy Framework (NPPF) (March, 2012) 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:
- ▶ the homes and jobs needed in the area;
 - ▶ retail, leisure and other commercial development
 - ▶ infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management and energy;
 - ▶ health, security, community and cultural infrastructure and other local facilities;
 - ▶ climate change mitigation and adaptation; and
 - ▶ conservation and enhancement of the natural and historic environment, including landscape.
- 1.3.2 Planning Practice Guidance (2014) clarifies (at 'Local Plans', paragraph 002) 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".

Development of the City of York Local Plan

- 1.3.3 The Local Plan Publication Draft (which is the subject of this SA) sets out the Council's vision for York to 2033 (with Green Belt boundaries set until 2038) and provides the spatial planning response to the challenge of growth. It has been developed taking into account national planning policy and guidance, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base and technical studies, and the outcomes of engagement.
- 1.3.4 The City of York Local Plan has been in preparation since 2005, when work was started on preparation of Core Strategy. The Council consulted on Core Strategy Issues and Options in June 2006. This represented the first formal stage in the preparation of the Local Plan and was followed by further consultation on issues and options in September 2007 and preferred options in June 2009. Taking into account the outcomes of this consultation, the findings of evidence base studies and assessment, the Council prepared its draft Core Strategy that was submitted for examination to the Secretary of State in February 2012. This set out (inter-alia) a vision, strategic objectives, targets and policies to guide future development in the City. However, following the (partial) revocation of the Regional Strategy (the Yorkshire and Humber Plan) in 2013 and the publication of the National Planning Policy Framework (NPPF) in March 2012, the Core Strategy was withdrawn from the examination process in order to produce a Local Plan compliant with new national planning policy.
- 1.3.5 To inform the Local Plan, the Council commissioned a number of important evidence base studies. These studies included (inter-alia) an Economic and Retail Growth and Visioning Study, Evidence on Housing Requirement in York, the North Yorkshire Strategic Housing Market Assessment (SHMA) and extensive site identification and assessment work. Together, they supported the identification of development options for the City that were set out in the Local Plan Preferred Options and subject to consultation in June 2013. The Preferred Options was accompanied by a SA Report which considered the sustainability strengths and weaknesses of the plan and policy options. A Further Sites Consultation was also undertaken in June 2014.
- 1.3.6 A Publication Draft Local Plan was prepared by Council officers and reported to the Local Plan Working Group (LPWG) and Executive in September 2014. A motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken. Following Council elections in 2015, the joint administration sought to prepare an updated evidence base for the Local Plan. The Council commissioned further evidence on housing and employment need to inform the Local Plan in the form of the York SHMA (2016) prepared by GL Hearn and updated Employment growth scenarios identified in the Employment Land Review (2016). Further evidence included further site assessments. The Council undertook a Preferred Sites consultation in 2016 to reflect the revised housing and employment growth and site assessments.
- 1.3.7 Following publication of sub-national housing projections, which affected the underlying baseline evidence in relation to housing need, and sites being brought forward for release by the Ministry of Defence in 2016, the Council revised the housing growth and site options set out in the Publication Draft Local Plan (2014) and Preferred Sites Consultation (2016). The LWPG and Executive received a report relating to the growth figure options, sites identified to accommodate growth, and proposed changes to a series of thematic policies in July 2017. The Local Plan Pre-Publication Draft (Regulation 18 Consultation), which was consulted on between September and October 2017, reflected these changes and considerations by the City of York Council Executive.
- 1.3.8 The Local Plan Publication Draft, which has taken account of the comments received to the previous stages, SA and the latest technical work, is now being published for formal representations. The proposed strategic approach, alongside proposed housing and employment allocations and plan policies, are set out in the Local Plan Publication Draft and is the subject of this SA Report.
- 1.3.9 Following this statutory consultation period and further refinement in light of representations received, the Council will proceed to submission of the Draft Local Plan, which is anticipated in the summer 2018. Adoption of the Local Plan is scheduled to take place in early 2019. The Local Plan milestones are set out in **Table 1.1**.

Table 1.1 Local Plan Preparation Milestones

Stage	Date
Core Strategy Issues and Options	June 2006/September 2007
Core Strategy Preferred Options	June 2009
Core Strategy Submission	February 2012
Further sites consultation	June 2014
(draft Local Plan for publication non published)	September 2014
Preferred Sites Consultation	July 2016
Local Plan Pre Publication Draft consultation (Regulation 18)	September 2017
Consultation on Publication Draft Local Plan (Regulation 19)	Spring 2018
Submission (Regulation 22)	Summer 2018
Examination in Public hearing sessions (Regulation 24)	Autumn 2018
Adoption (Regulation 26)	Early 2019

- 1.3.10 Further information in respect of the preparation of the Local Plan is available via the Council's website: www.york.gov.uk/localplan.

1.4 The Local Plan Publication Draft

Scope of the Local Plan Publication Draft

- 1.4.1 The draft Local Plan comprises the following core components:

- ▶ Vision and Outcomes;
- ▶ Key Development Principles;
- ▶ Spatial Strategy;
- ▶ Thematic Policies.

Each plan component is described in-turn below

The Vision and Outcomes

- 1.4.2 The Vision for York is contained with Chapter 2 of the Local Plan Publication Draft. The Vision is reproduced below:

“York aspires to be a city whose special qualities and distinctiveness are recognised worldwide. The Local Plan aims to deliver sustainable patterns and forms of development to support this ambition and the delivery of the city’s economic, environmental and social objectives. This will include ensuring that the city’s place making and spatial planning policies reflect its heritage and contemporary culture, contributing to the economic and social welfare of the community whilst conserving and enhancing its unique historic, cultural and natural environmental assets.”

The plan will ensure that the vision and outcomes are delivered in a sustainable way that recognises the challenges of climate change, protects residents from environmental impacts and promotes social, economic and cultural wellbeing.”

- 1.4.3 The Vision and objectives are articulated within the following four outcomes:

- ▶ Protect the Environment;
- ▶ Create a Prosperous City for All;
- ▶ Ensure Efficient and Affordable Transport Links;
- ▶ Provide Good Quality Homes and Opportunities.

Key Development Principles

- 1.4.4 Chapter 2 of the draft Local Plan includes three policies that detail the key development principles intended to support the delivery of the vision outlined above. These policies are:
- ▶ Policy DP1 - the approach taken to development which reflects the role of the York Sub Area;
 - ▶ Policy DP2 - the basic development principles that arise from the vision which underpin the strategic policies in each of the subsequent sections of the plan; and
 - ▶ Policy DP3 - the key development principles pertinent to quality 'sustainable communities' that will also guide the Council in its consideration of all development proposals.
- 1.4.5 These policies are supplemented by Policy DP4 which sets out the Council's overall approach to development management which is to take a positive approach in favour of sustainable development, work proactively with applicants and to secure development that improves economic, social and environmental conditions in the area.

Spatial Strategy

- 1.4.6 The spatial strategy is set out in Chapter 3 of the draft Local Plan. The strategy broadly reflects York's sub-regional role in the Leeds City Region and the York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) and seeks to ensure that the City is a key economic driver, retail, service and transport hub; and that its housing needs are met within the local authority area whilst conserving and enhancing the City's historic and natural environment.
- 1.4.7 In this context, the draft Local Plan makes provision for employment land to accommodate around 13,000 new jobs (around 650 per annum) based around a re-profiled economy between 2017/18 and 2037/38 and a minimum annual provision of 867 new dwellings over the plan period. As per Policy SS1 (Delivering Sustainable Growth for York), the location of this development will be guided by the following five spatial principles:
- ▶ Conserving and enhancing York's historic and natural environment. This includes the City's character and setting and internationally, nationally and locally significant nature conservation sites, green corridors and areas with an important recreation function;
 - ▶ Ensuring accessibility to sustainable modes of transport and a range of services;
 - ▶ Preventing unacceptable levels of congestion, pollution and/or air quality;
 - ▶ Ensuring flood risk is appropriately managed;
 - ▶ Where available and viable, encouraging the re-use of previously developed land.
- 1.4.8 The identification of sites is underpinned by the principle of ensuring deliverability and viability (as noted in Policy SS1). This accords with NPPF paragraph 173 which states that pursuing sustainable development requires attention to viability and costs with "competitive returns to a willing land owner and willing developer to enable the development to be deliverable." Delivering development through the local plan in accordance with the spatial drivers requires a balanced approach to the social, economic and environmental concerns.
- 1.4.9 The majority of dwellings (around 13,500 including some provision between 2033 and 2038) to be located at seventeen strategic housing sites including land adjacent to the existing built up area of York and a new settlement to the south east. The Local Plan sets out a number of large strategic housing sites, five of which will expect a proportion of delivery beyond the plan period:

- ▶ ST5: York Central (to accommodate approximately 1,700 dwellings of which 1,500 will be delivered after the plan period between 2033 and 2038);
- ▶ ST9: Land North of Haxby (to accommodate approximately 735 dwellings of which 93 will be delivered after the plan period between 2033 and 2038);
- ▶ ST14: Land west of Wigginton Road (to accommodate approximately 1,348 dwellings of which 348 will be delivered after the plan period between 2033 and 2038);
- ▶ ST15: Land to the West of Elvington Lane (to accommodate approximately 3,339 dwellings around 1,139 will be delivered after the plan period between 2033 and 2038).
- ▶ ST36: Imphal Barracks, Fulford Road (to accommodate approximately 769 dwellings, all dwellings are expected to be delivered after the plan period).

1.4.10 The City's remaining housing requirement is to be met at smaller (local) allocations (comprising a total of 1,497 dwellings). The overall land supply calculation includes an allowance for windfall sites which are under 0.2ha and not allocated. However, the Local Plan Publication Draft takes a cautious approach on this matter and does not rely on these sites to ensure land supply is adequate to meet the identified housing requirement. Rather, it makes use of this component of supply to provide additional flexibility. The Local Plan Publication Draft has included enough land in the early years of the trajectory to ensure there is a 20% buffer in the 5 year supply in accordance with the requirements of the NPPF. The Local Plan Publication Draft also allocates sites for student housing and for Travelling Showpeople (three plots). Gypsy and Traveller needs will be met through existing sites and through strategic housing allocations.

1.4.11 York Central (ST5) forms part of a comprehensive mixed used development under Policy SS4 to enable the creation of a new multi-use area of the City. This will include: a new central business district (with 100,000m² of B1 office floorspace); expanded and new cultural and visitor facilities; residential uses (as set out above); and a new vibrant residential community. Further to these provisions, Policy SS5 promotes the revitalisation of the Castle Gateway and seeks public realm and accessibility improvements in this key location in the City.

1.4.12 In addition to the development of employment uses as part of the mixed use site at York Central (ST5) there are four strategic employment allocations (within Policies SS21-SS24). In addition to the employment land provided for as part of the proposed strategic allocations (57.5ha), a further 9.5ha of land is allocated at dedicated employment sites. York City Centre is to remain the focus for main town centre uses with Castle Gateway (ST20) opportunity area identified as a strategic site.

1.4.13 Importantly, the Local Plan Publication Draft defines the proposed York Green Belt (SS2), the overall purpose of which is to safeguard the setting and special character of York whilst assisting in safeguarding the countryside from encroachment. The policy provides for an enduring Green Belt beyond the Plan Period.

Thematic Policies

- 1.4.14 To support the overall strategy for development, the draft Local Plan includes 80 policies across the following chapters:
- ▶ Economy and Retail which has nine draft policies including proposed employment land allocations;
 - ▶ Housing which has ten policies including proposed housing allocations (with one site for extra care) and one site allocated for Travelling Showpeople;
 - ▶ Health and Wellbeing which has seven policies;
 - ▶ Education which has eight policies including proposals to support the expansion of the City's university campuses and other educational facilities;
 - ▶ Placemaking, Heritage, Design and Culture which has fourteen policies;

- ▶ Green Infrastructure which has seven policies including proposals for new open space provision;
- ▶ Managing Appropriate Development in the Green Belt which has four policies;
- ▶ Climate Change which has three policies;
- ▶ Environmental Quality and Flood Risk which has five policies;
- ▶ Waste and Minerals which has two policies;
- ▶ Transport and Communication which has ten policies including proposals for strategic transport improvements;
- ▶ Delivery and Monitoring which has one policy.

1.5 Sustainability Appraisal

The Requirement for Sustainability Appraisal

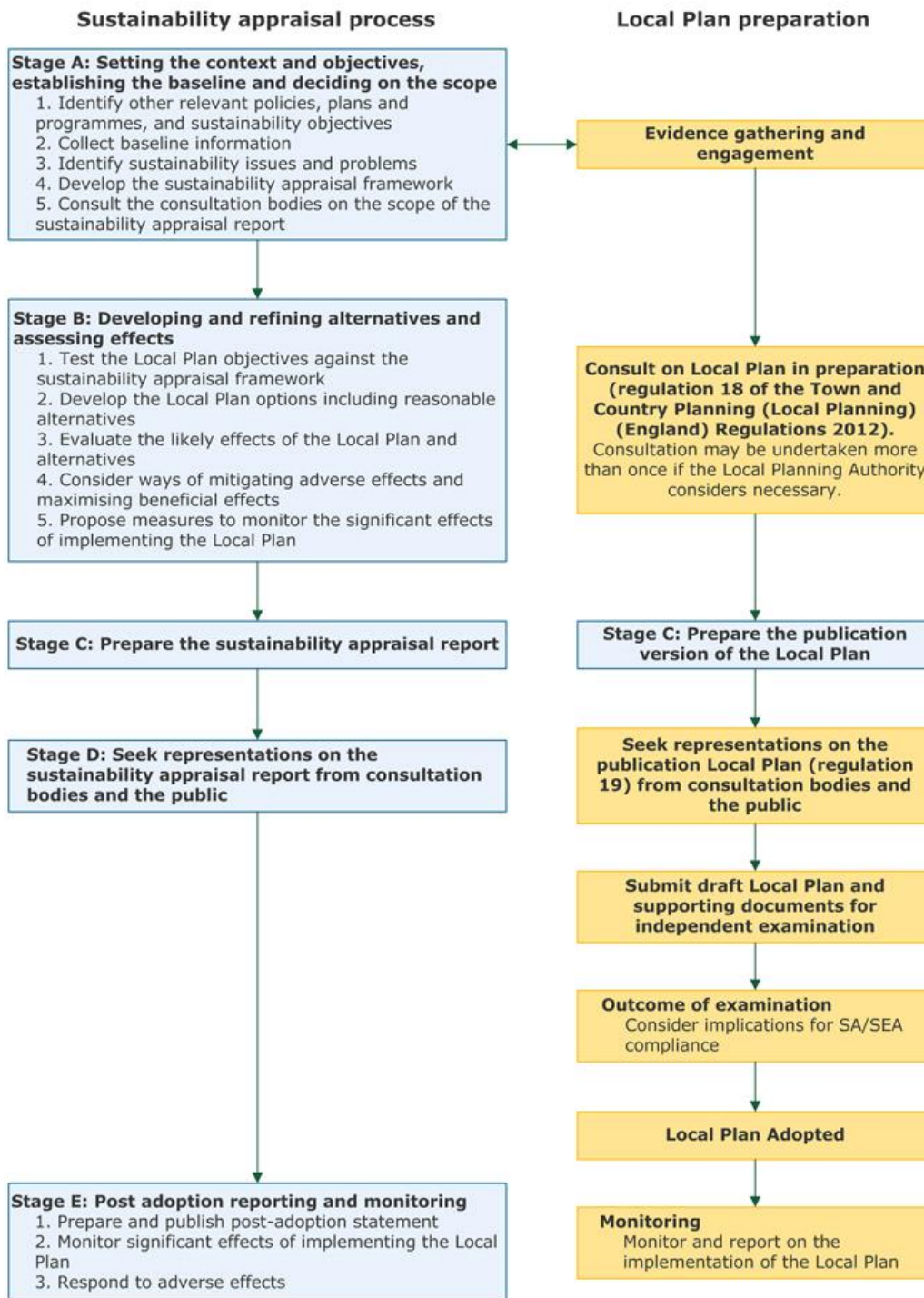
- 1.5.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, the Council is required to carry out a SA of the Local Plan to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. In undertaking this requirement, local planning authorities must also incorporate the requirements of European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, referred to as the SEA Directive, and its transposing regulations, the Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).
- 1.5.2 The SEA Directive and transposing 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.”*
- 1.5.3 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.”*
- 1.5.4 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 concerns the extent to which the plan is the most appropriate strategy, when considered against the reasonable alternatives and available and proportionate evidence.
- 1.5.5 In this context, SA is an integral part of the preparation of the Local Plan for 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.

Stages in the Sustainability Appraisal Process

- 1.5.6 There are five key stages in the SA process and these are highlighted in **Figure 1.1** together with links to the development of the Local Plan. The first stage (**Stage A**) led to the production of a SA Scoping Report¹⁰. Informed by a review of other relevant policies, plans and programmes as well as baseline information and the identification of key sustainability issues affecting the District, the Scoping Report set out the proposed framework for the appraisal of the Local Plan (the SA Framework).
- 1.5.7 The Scoping Report was subject to a 6 week consultation period in May 2013. Overall, three responses were received to the consultation (two from the statutory SEA consultation bodies (English Heritage, now Historic England, Natural England) and one from North Yorkshire County Council. Responses related to all aspects of the Scoping Report and resulted in amendments to the SA Framework. **Appendix B** contains a schedule of the consultation responses received to the Scoping Report, the Council's response and the subsequent action taken and reflected in subsequent SA Reports, including this SA Report.
- 1.5.8 **Stage B** is an iterative process involving the appraisal and refinement of the Local Plan with the findings presented in a series of interim SA Reports. In this context, the options concerning the quantum and distribution of growth that were identified in the Preferred Options (2013) document, Preferred Sites Consultation (2016) and Local Plan Pre-Publication Draft (2017) were assessed using the revised SA Framework with the findings presented in a SA Report that was issued for consultation alongside the document. A total of 12 responses were received to the consultation on the SA Report in 2013, 10 to the 2016 report and 27 to the 2017 report (see **Appendix B**). Furthermore, the 2014 draft Local Plan report to the LPWG and Executive was also subject to a full SA Report, but this was not formally published following the motion carried by City of York Council (as set out in **Section 2**). **Stage C** forms the preparation of the final SA Report. This SA Report and the appraisal contained therein forms part of **Stage C**.
- 1.5.9 The SA Report is now being made available for representations alongside the Local Plan Publication Draft prior to consideration by an independent planning inspector. The publication of the SA Report itself therefore fulfils **Stage D**.
- 1.5.10 Following Examination in Public (EiP), and subject to any significant changes to the draft Local Plan that may require appraisal as a result of the EiP, the Council will issue a Post Adoption Statement as soon as reasonably practicable after the adoption of the Local Plan. This will set out the results of the consultation and SA process and the extent to which the findings of the SA have been accommodated in the adopted Local Plan. During the period of the Local Plan, the Council will monitor its implementation and any significant social, economic and environmental effects (**Stage E**).

¹⁰ City of York Council (2013) *Local Plan Sustainability Appraisal: Scoping Report*.

Figure 1.1 The Sustainability Appraisal Process and Linkages with Local Plan Preparation



Source: Department for Communities and Local Government (CLG) (2014) *Planning Practice Guidance*.

1.6 Consultation so far

1.6.1 The SA process has been informed by ongoing consultation, most notably during the scoping stage (2013) and through the SA Reports published alongside the Local Plan Preferred Options (2013), the Preferred Sites Consultation (2016) and Local Plan Pre-Publication Draft (2017). A summary of consultation responses received to the SA Reports published at the previous stages, together with an overview of how these responses have been taken into account in the preparation of this report, is contained at **Appendix B**.

1.7 Other Assessments

- 1.7.1 Alongside the SA, the emerging Local Plan has also been subject to, and informed by a Heritage Impact Appraisal (HIA). A draft Habitats Regulations Assessment (HRA) has also been produced as part of the preliminary assessment of the emerging Local Plan.

Heritage Impact Appraisal

- 1.7.2 The purpose of the Heritage Impact Appraisal (HIA) is to assess whether the draft Local Plan will conserve or enhance the special characteristics of the City. The assessment has considered the strategic sites, allocations and policies of the draft Plan against six principal characteristics of the historic environment that help define the special qualities of York. The principal characteristics detailed are:
- ▶ Strong Urban Form;
 - ▶ Compactness;
 - ▶ Landmark Monuments;
 - ▶ Architectural Character;
 - ▶ Archaeological Complexity; and
 - ▶ Landscape and Setting.
- 1.7.3 The findings of the HIA have informed the appraisal of the draft Local Plan as part of this SA and specifically in respect of SA Objectives 14 (Conserve or enhance York's historic environment, cultural heritage, character and setting) and SA Objective 15 (Protect and enhance York's natural and built landscape). The HIA's assessment of the proposed policies/sites against the six principal characteristics set out in the Heritage Topic Paper has been used to inform the SA scoring of the draft strategic sites and policies as reflected in **Section 5**.
- 1.7.4 There has been ongoing dialogue between City of York Council officers and Historic England with regards to the assessment of potential site allocations and alternatives since Preferred Options Local Plan consultation stage. This has informed the methodology taken forward in the Heritage Impact Assessment.
- 1.7.5 In relation to emerging sites, the HIA both appraises the potential impact from the principle of development, and further appraises the impact of development with policy requirements 'turned-on'. The Council considers that this represents a thorough approach to establishing the potential impact of the Plan in its entirety. While the Council does not have a statutory duty to produce an HIA, the Council recognise the benefits of undertaking HIA in terms of producing a better plan within the context of an historic city.
- 1.7.6 The appraisal's ongoing conclusions have already helped to shape policy choices and site selection. The changes in the Plan at Publication Draft stage are not considered to have an effect of changing the anticipated impacts on principal characteristics over and above those identified at Pre-Publication stage. As such, the HIA policy conclusions (as set out in the Report which accompanied the Pre-Publication Draft) remain current.
- 1.7.7 The HIA Report is available via the Council's website via the following link:
www.york.gov.uk/localplan.

Habitats Regulations Assessment

- 1.7.8 The Conservation of Habitats and Species Regulations 2017 and The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 (as amended) (collectively referred to in this report as the Habitats Regulations) implement the Habitats Directive in England and Wales. Under the Habitats Regulations, any land use plan likely to have a significant effect upon a 'European site' must be subject to an appropriate assessment to determine the implications for the designated site

in view of its conservation objectives. 'European sites' are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora and Special Protection Areas (SPA) designated under Council Directive 2009/147/EC on the Conservation of Wild Birds. Ramsar Sites (designated under the 1976 Ramsar Convention) are not European sites but under UK planning policy are given the same level of protection.

- 1.7.9 Under the Habitats Regulations, as the competent body, the Council must determine if the draft Local Plan is likely to have a significant (adverse) effect on a European or Ramsar site in Great Britain or a European offshore marine site, either alone or in combination with other plans or projects. If significant effects are anticipated then an appropriate assessment of the implications for the site in view of its conservation objectives must be undertaken. This is known as a Habitats Regulation Assessment (HRA).
- 1.7.10 The HRA preliminary assessment (2017) identified that the focus of the HRA of the Local Plan should be upon the following Natura 2000 sites:
- ▶ Strensall Common (SAC);
 - ▶ Lower Derwent Valley (SPA, SAC & Ramsar);
 - ▶ River Derwent (SAC);
 - ▶ Skipwith Common (SAC);
 - ▶ Humber Estuary (SPA, SAC & Ramsar).
- 1.7.11 The emerging findings of the HRA has informed the appraisal of the draft Local Plan as part of this SA and specifically in respect of SA Objective 8 (Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment). The City of York Council is engaged in positive discussions with Natural England to take forward the habitats regulations work and finalise a HRA Report to accompany the Local Plan.
- 1.7.12 A HRA Report is being produced to accompany the draft Local Plan. When complete, the final HRA Report will be made available via the Council's website via the following link:
<http://www.york.gov.uk/localplan>

1.8 Comment on this SA Report

- 1.8.1 This SA Report has been issued for consultation alongside the Local Plan Publication Draft from **21st February to 4th April 2018**. Details of how to respond to the consultation are provided below.

This Consultation: How to Give Us Your Views

We would welcome your views on any aspect of this NTS or SA Report.

Please provide your comments by midnight on 4th April. Your comments should be made using a response form available to complete online via York Council's website: www.york.gov.uk/localplan. You can also download a response form and return to:

By email: localplan@york.gov.uk

By post: **Freepost RTEG-TYYU-KLTZ**
Local Plan
City of York Council
West Offices
Station Rise
York
YO1 6GA

2. The Development of the Local Plan

2.1 Introduction

- 2.1.1 The City of York Local Plan has evolved using policies, information and analysis gathered from the earlier Core Strategy that was not adopted as well as a diverse evidence base, assessment (including SA) and revised Government guidance. This section of the report explains how the Council has drawn on the development of the Core Strategy and these other sources to help shape the Spatial Strategy now used in the draft Local Plan. This is intended to document the process of the development of the preferred approach set out in the Local Plan Publication Draft alongside the rejection of alternatives.

2.2 Local Development Framework Core Strategy

- 2.2.1 The Council started to prepare its Local Development Framework (LDF) following the approval of the draft Local Plan fourth set of changes for Development Control Purposes in April 2005 and the introduction of the LDF process by the Government in 2004. The Core Strategy was intended to form the key strategic planning document, setting out the key spatial policies for the City. It was prepared through a number of stages which are described in-turn in the following subsections.

Issues and Options 1 (2006) and 2 (2007)

- 2.2.2 Issues and Options 1 set out the broad issues and options facing York. This was followed by Issues and Options 2, which explored these themes in more detail and began to consider the opportunities and need for development.
- 2.2.3 The spatial approach included within both stages of the Issues and Options were strongly influenced by the then emerging Regional Spatial Strategy (RSS) for Yorkshire and Humber, which set targets for the scale of development and had an emphasis on urban consolidation with limited development in smaller towns and larger villages. For York this meant that new development should be concentrated within the main urban area with limited development within larger villages. To understand how York could grow in the future and where development should be located, a settlement hierarchy was developed following an analysis of settlement sustainability that included access to services and transport. As part of this process, consideration was also given to highway capacity as well as to the key characteristics of York which shaped its urban form (the 'shapers' were historic character and setting, flood risk and nature conservation). Market requirements were also considered for employment sites.
- 2.2.4 Growth options for both housing and employment were based upon the emerging RSS figures as well as the latest evidence base. These were presented for a 20 year time span to enable a degree of permanence to be given to the Green Belt. More specifically, the following options were consulted on:

Spatial Strategy

- ▶ **Option 1:** Prioritising settlement accessibility - Distribute development to the settlements offering the best access to jobs and services, using a sustainability ranking;
- ▶ **Option 2:** Prioritising existing trends - Continue to distribute housing development broadly in line with past trends, following a similar pattern for employment because of its connection with housing growth in creating sustainable communities;
- ▶ **Option 3:** Prioritising housing need - Distribute housing development in terms of the needs of the groups and priorities identified by the Housing Market Assessment (HMA). This identified the urban and suburban parts of York (including Haxby and Wigginton) as offering the best opportunities to provide for the needs of newly forming households; and

- ▶ **Options 4:** A combination of the above broad factors.

Housing Growth

- ▶ **Option 1:** Emerging RSS housing figure – 630 dwellings per annum;
- ▶ **Option 2:** Emerging RSS Panel Report – 791 dwellings per annum (640pa 2004-2011; 850pa 2011-2021);
- ▶ **Option 3:** Projecting forward RSS - 718 dwellings per annum;
- ▶ **Option 4:** SHMA housing need – 982 dwellings per year; and
- ▶ **Option 5:** Lower housing growth – less than 630 dwellings per annum.

Employment Growth

- ▶ **Option 1:** Employment Land Review Growth projections – 1060 additional jobs per annum;
- ▶ **Option 2:** Support the RSS growth projections – 545 new jobs per annum; and
- ▶ **Option 3:** An alternative approach (to be suggested through consultation).

Sustainability Appraisal

2.2.5 An SA was prepared for both stages of the Core Strategy Issues and Options by Baker Associates. This was published alongside the Core Strategy Issues and Options Local Plan in each consultation undertaken. **Table 2.1** summarises the Issues and Options Stage and outcomes of the consultation process, including the comments made by the SA.

Table 2.1 Summary of the SA of the Issues and Options 1 and 2

ISSUES AND OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
Spatial Strategy	PPS1, PPS12 Draft Regional Spatial Strategy for Yorkshire and Humber (RSS)	<i>Broad Influences:</i> Regional context, relationship between York & its larger villages – accessibility & past market trends, broad economic and demographic trends, settlement accessibility; and housing need. <i>Detailed Influences:</i> environmental constraints, historic character & setting of York, nature conservation, flood risk, Commuting, congestion, City & district centres, and the location of major development sites and opportunities. Options presented regarding the location of future development: Option 1: Prioritising settlement accessibility	The four tier approach to considering the settlement hierarchy appeared suitable as it anticipated that it should aid in reducing dispersed development and instead concentrate growth to key settlements where it would suitably be accommodated. The success of this approach would be determined when the amount of growth can be quantified for each settlement and the amount of greenfield land required to accommodate the future needs of the city. With regards to Option 1 it was likely to perform well in terms of environmental sustainability through reducing the need to travel by locating growth in close proximity to services and by some of the villages having good public transport access. Accessibility to services also proved positive in terms of social sustainability objectives by ensuring equitable and local access to shops etc, although there was a concern in terms of how the character of the community could be affected through growth. Several of the villages have identified employment areas, which could also support the economic sustainability objectives. Option 2 selected settlements, which had few employment opportunities, and poor public transport access, which may lead to an increase in the	Majority of respondents prioritised settlement accessibility and directing most growth to York’s main urban area. Comments provided on merits of the different constraints on development: Flood risk, protecting all habitats and tackling congestion. Protecting the historic character and setting was deemed the most important factor. Respondents considered that access to a wider range of facilities, access to non-car modes of transport, infrastructure quality and pollution should be considered as location factors.

ISSUES AND OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
		<p>Option 2: Prioritising existing trends</p> <p>Option 3: Prioritising housing need</p> <p>Option 4: A combination of the above broad factors</p>	<p>need to travel and therefore negative in terms of both economic and environmental objectives. Further to this it would also limit access to services and facilities with negative social consequences and lack a cohesive character to the place. Option 3 only identified one tier 2 settlement and it gave less choice for sustainable expansion to take on board housing and employment growth needs indicating additional greenfield land take up and potential in-commuting, most likely by car. The option was also identified as having negative effects on social objectives due to a lack of provision of a range of type and locations of housing and employment opportunities which was considered to affect the community character of Haxby, the identified village.</p> <p>The SA recommended that all of the factors and influences listed are taken into consideration alongside the short and long-term effects of growth. It also identified which impacts could be mitigated against through appropriate design and layout</p>	<p>Respondents were broadly supportive of the settlement hierarchy but thought that this should be quantified in terms of number of homes and employment.</p>
Housing Growth	RSS PPS3	<p><i>Evidence and Influences</i></p> <p>Drawing of demographic and market demand; Other factors taken into consideration include development constraints and forecast economic growth.</p> <p>Options presented regarding the quantum of housing:</p> <p>Option 1: Emerging RSS housing figure – 630 dwellings per annum;</p> <p>Option 2: Emerging RSS Panel Report – 791 dwellings per annum (640pa 2004-2011; 850pa 2011-2021);</p> <p>Option 3: Projecting forward RSS - 718 dwellings per annum;</p> <p>Option 4: SHMA housing need – 982 dwellings per year; and</p> <p>Option 5: Lower housing growth – less than 630 dwellings per annum.</p>	<p>The level of provision for housing was considered adequate to ensure that there would be sufficient homes to accommodate the growth of the current population given the predicted drop in household size in the forthcoming years. The strategic approach would need to limit the amount of unsustainable sites coming forward through identifying planned growth areas (as per the spatial strategy). Higher targets for housing would clearly have an effect on land take-up whilst lower options could lead to higher amounts of in-commuting to jobs due to insufficient amounts of housing, both of which were assessed as having negative environmental effects. Low growth options may also not provide enough affordable housing and exacerbate the wages to house price ratio leading to negative social impacts. Similarly, negative impacts relating to the amount of workforce to support the economic objectives may become a problem.</p> <p>The potential sustainability impacts identified for these options were:</p> <ul style="list-style-type: none"> • greater land take with potential biodiversity and landscape impacts • greater use of natural resources • the potential to allocate sites advance so site could come forward with a sustainable framework, rather than a piecemeal approach providing for affordable housing needs 	<p>Core Strategy should reflect most up to date RSS figures. (RSS not finalised at time of consultation).</p> <p>Flexibility required to accommodate higher figures should it need to arise.</p> <p>Priority should be given to locations within or adjacent to York's main urban area in preference to village expansions.</p> <p>The settlement hierarchy was broadly supported but should be quantified in terms of the number of homes.</p> <p>The LDF should deliver levels of housing as set out by RSS.</p>
Employment Growth	RSS	<p><i>Evidence and Influences</i></p> <p>A first stage Employment Land Review (ELR) was also</p>	<p>The SA identified that under option 1 a larger amount of land would be required for employment and this would have clear impacts on the take up of greenfield land and consequently biodiversity, landscape and the historic character. It would also</p>	<p>The Core Strategy should reflect employment land requirements set out in the RSS.</p>

ISSUES AND OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
		<p>commissioned by the Council to establish the amount of predicted jobs growth.</p> <p>Options presented regarding the quantum of employment:</p> <p>Option 1: Employment Land Review Growth projections – 1060 additional jobs per annum;</p> <p>Option 2: Support the RSS growth projections – 545 new jobs per annum; and</p> <p>Option 3: An alternative approach (to be suggested through consultation).</p>	<p>achieve a higher number of jobs than the workforce available, which would lead to in-commuting and the impacts on the ecological footprint of the city, which could lead to negative social impacts. Options 2 would have a lesser impact on the environment but may cause out-commuting should the number of jobs prove too few for the workforce needs. Increased job growth as per option 1 may also put pressure on the housing market and further exacerbate housing prices with wages through increased demand. Option 1 may have positive implications for the economy of York but option 2 may not provide enough job growth to support Science City York, which is a key objective for the Core Strategy.</p>	<p>There needs to be a significant supply of employment land to facilitate choice, movement and 'churn' in the market.</p> <p>It should be located where it can be easily accessed to minimise impacts on the road network.</p> <p>Support was given to the development of Bioscience, IT and Digital and Creative Technology.</p> <p>The Core Strategy had not distinguished enough between the cultural life of York as enjoyed by the residents or the needs of tourists.</p>
<p>Justification for Selection of Spatial and Growth Options Taken Forward</p> <p>There was general support for the options set out at this stage. The SA did identify further consideration to take into account moving to the Preferred Options stage which included defining the proportion of development attributed to each tier within the hierarchy and understanding more about settlement capacity/suitability for development. The SA also recommended that the potential location of greenfield sites should be presented to give indicative locations for growth.</p> <p>In term of growth, the two sets of numbers on housing and jobs were identified to be strongly linked and some balance was needed between them in order to implement more sustainable development given that this could influence in-out commuting for example and have resultant positive or negative social and environmental impacts. Mixed responses were received through consultation in terms of the numbers.</p> <p>For the Preferred Options stage, the adoption of the RSS meant that the regional spatial strategy / settlement hierarchy alongside the consultation responses and SA commentary also helped to refine the hierarchy moving to the Preferred Options Stage. The Core Strategy Preferred Options Spatial Strategy has taken forward a combined approach to the settlement hierarchy using Options 1 and 3 from those detailed above. This was to ensure that objective need could be met within the city whilst also being located in the most sustainable locations for York.</p>				

Core Strategy Preferred Options (2009)

- 2.2.6 The figures for housing growth taken forward by the Preferred Options reflected Options 1/2 of the Issues and Options Stage given that they reflected the RSS approach. The Yorkshire and Humber Plan was adopted in May 2008 and this established the quantum of growth needed for the City. The Yorkshire and Humber Plan set housing growth at 640 dwellings per annum between 2004-2008 and 850 dwellings per annum between 2008-2026. In order to create a Green Belt for York enduring until at least 2030, the 850 dwellings per annum growth target was projected forward between 2026-30. The policy for employment growth supported York's economic success to ensure the City fulfilled its role as a key driver in the regional economy through the provision of sufficient land. A revised local evidence base set annual job growth at 1,113 jobs per annum / 25,600 jobs between 2006-2029. In consequence, the spatial strategy within the Core Strategy concentrated on identifying alternative opportunities to accommodate this growth.
- 2.2.7 The Preferred Options formally defined a settlement network, wherein York was a Sub-regional centre. This informed the settlement hierarchy previously identified at the Issues and Options stage which was taken forward to determine the type of acceptable development in different locations in the City. This approach is predominantly based upon Option 1 of the Issues and Options Spatial Strategy approach. In addition, the key characteristics set out at the Issues and Options stage were taken forward as the main shapers for the City. A combination of factors were

taken forward (as per Option 4 of the Spatial Strategy at Issues and Options Stage) to reflect consultation comments to ensure the most sustainable locations were identified. The settlement hierarchy and City shapers were articulated into three spatial principles within the Core Strategy:

- ▶ 1. A sustainable settlement hierarchy;
- ▶ 2. Areas of Constraint; and
- ▶ 3. Approach to Future Development.

2.2.8 Major development opportunities and sites were identified as having importance for delivering the spatial strategy. This included a brownfield first policy but also incorporated three greenfield sites (with existing planning permission) to meet the identified need. Further areas of search for future development were identified from areas outside of the key characteristics and refined through more site specific sustainability criteria to enable land to be identified outside of the Green Belt to ensure a degree of permanence beyond the Plan period.

Sustainability Appraisal

2.2.9 A SA was undertaken for the Preferred Options Core Strategy by City of York Council. This was published alongside the Core Strategy Preferred Options Consultation document in Summer 2009.

2.2.10 **Table 2.2** summarises the Core Strategy Preferred Options stage and consultation responses, including an overview of comments made by the SA.

Table 2.2 Summary of the SA of the Core Strategy Preferred Options

CORE STRATEGY PREFERRED OPTIONS STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
Spatial Strategy	PPS1, PPS12 Regional Spatial Strategy for Yorkshire and Humber (RSS)	<p>The strategy articulated through spatial principles rather than a policy. These draw upon evidence base and policy guidance. The Principles are:</p> <ul style="list-style-type: none"> • SP1: Settlement hierarchy; • SP2: Areas of constraint; • SP3: Approach to Future Development. <p>The identification of future areas of search for development was based upon a mapping approach to take account of primary constraints on development e.g. flood risk, historic character and setting and green infrastructure.</p> <p>The identification of strategic sites and future areas of search would have set the Green Belt for 20 years until 2031.</p> <p>Areas of search for further land for development identified.</p> <p>The role of York's main built up area as a Sub-</p>	<p>SP1 would help to direct the majority of development, including economic growth, services and facilities to the main urban area, focussing on the city centre in particular. This approach was identified to help to maintain the long-term viability of the city and strengthen its role as a sub-regional centre in terms of retail and business. It also promoted growth in the main population where it has existing access to services/facilities. Overall this supported social objectives relating to population, health and well-being, equity of access to services, affordable housing and reducing the need for people to travel by car. This principle was assessed as helping make use of the existing infrastructure and transport network and promoted sustainable access to new development, although impacts relating to congestion within the urban area were identified. The settlement hierarchy would help the historic setting of the city by limiting development within outlying villages and directing development to where it would be more easily absorbed. However, locating the majority of growth within the urban area was identified to have potentially adverse effects should development not respect heritage assets.</p>	<p>Differing views on the scale of growth and the need to allocate greenfield/ Green Belt for development and be more explicit about urban extensions.</p> <p>Continuing concern that the historic character of the City is not fully taken into account in the approach to development.</p> <p>Should include the regional or sub-regional picture from the RSS. The section should also set out how the overall principles might be translated into patterns of development on the ground and how there would be different ways of addressing the needs that are identified through different spatial options.</p>

		<p>Regional City, providing the primary focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities was set out through the RSS.</p>	<p>The SA identified that SP2 would have a predominantly positive impact across the SA objectives given that it would locate development away from environmentally sensitive areas in relation to heritage and biodiversity, ensure sites were accessible to transport and services as well as manage flood risk.</p> <p>SP3 was identified to generally support the SA objectives by supporting growth within the sub-regional centre primarily followed by the settlement hierarchy locations and only considering greenfield site where they did not conflict with SP2. The brownfield development first policy was also thought to have particular benefits for supporting regeneration and reducing impacts on the environment. It also supported social objectives by locating development where it reduced the need to travel by car and was in proximity to the main urban area.</p> <p>The designation of the Green Belt was appraised to have likely positive effects, particularly for the character and setting of the city. This in turn was identified to have direct and indirect benefits for majority of SA objectives through ensuring the Green Belt was able to meet the needs of York and ensure a degree of permanence post the plan period.</p>	<p>A number of alternative areas of search for future development were proposed.</p>
Housing Growth	RSS PPS3	<p>RSS defined the requirement as</p> <ul style="list-style-type: none"> 640 dwellings per annum – 2004/2008 850 dwellings per annum– 2008/2026 	<p>This is comparable to Options 1 and 2 at the Issues and Options Stage. The SA identified that the level of provision for housing needed to ensure there would be sufficient homes to accommodate the growth of the current population given the predicted drop in household size in the forthcoming years. The strategic approach would need to limit the amount of unsustainable sites coming forward through identifying planned growth areas (as per the spatial strategy). The SA appraised that this level of housing growth would enable the needs of the city to be met which would have predominantly positive impacts for the majority of social and economic objectives. Specifically it was identified that this would help support the provision of a workforce in line with employment growth and enables a mix of housing to come forward.</p>	<p>33% of respondents supported the 850 housing figure and stated the recession shouldn't be used to justify a lower figure.</p> <p>59% of respondents preferred a lower figure which they felt better reflected the need for housing.</p>
Employment Growth	RSS	<p>The policy supported York's continued economic success and prosperity helping to ensure that it fulfill its role as a key driver in the regional economy through the provision of sufficient land in sustainable locations. The policy identified key development areas and principles for where employment land (B uses) would be supported.</p> <p>This approach was based upon updated evidence acquired from a second stage</p>	<p>The preferred approach was identified to supply a large amount of land that would be required for employment, which would have clear impacts on the take up of greenfield land and consequently biodiversity, landscape and the historic character. It would also achieve a higher number of jobs than the workforce available, which would lead to in-commuting and the impacts on the ecological footprint of the city, which could lead to negative social impacts. It also identified that this would have a positive impact as the provision of employment land which would help</p>	<p>43% of respondents agreed with the number of predicted jobs.</p> <p>48% of the sample believed the number of predicted jobs should be lower.</p> <p>The remaining 9% of respondents said that the number should be higher.</p>

		<p>Employment Land Review, which indicated a job total growth between 2006-2029 of 25,600. The projection of the annual job growth to 2029 was forecast as 1,113. The total land requirement was 49.6ha.</p>	<p>to stimulate and sustain economic growth and provide jobs within York. There were also associated benefits with strengthening links between the University and business for education and training purposes through the expansion of the Campus. It was recommended that additional text was added to support rural economies and that there were better links between culture, leisure and tourism with this policy.</p>	
<p>Justification for Selection of Spatial and Growth Options Taken Forward</p> <p>The Core Strategy Preferred Option Spatial Strategy that was taken forward was a combined approach to the settlement hierarchy using Options 1 and 3 from those detailed at Issues and Options stage. This was to ensure that objectively assessed housing need could be met within the city whilst also being located in the most sustainable locations for York. It was amended to reflect the requirements set out in the adopted RSS as well as being refined by the SA recommendations and the consultation responses received at the Issues and Options stage.</p> <p>The housing growth option taken forward followed the requirements of the adopted RSS, which dictated the housing targets for the authority. The preferred option was in line with Options 1 and 2 previously set out, which was at the higher end of the growth options looked at during the Issues and Options Stage which were based upon the draft RSS.</p> <p>Employment growth figures were chosen to reflect the revised employment land evidence base and overall growth targets set out within the RSS. This equated to a similar job figure as outlined by Option 1 at the Issues and Options stage, which was also based upon available evidence.</p>				

Core Strategy Submission (2011)

- 2.2.11 Following the announcement¹¹ of the Coalition Government to abolish the RSS and regional housing targets, Arup were commissioned by the Council to consider whether the RSS housing figures were still appropriate taking into consideration current evidence base and planning policy. Arup concluded that an appropriate annual average for York would be between 780-800 dwellings per annum. Taking this into account, the average housing target was set to deliver an average of 800 dwellings per annum over the plan period. The target was phased as follows to take into account the economic climate at this time:
- ▶ 635 dwellings per annum between 2011/12 and 2015/2016;
 - ▶ 855 dwellings per year between 2016/17 and 2030/31.
- 2.2.12 Arup were also commissioned to evaluate the previous projections outlined within the Employment Land Reviews, which projected the creation of up to 1,000 jobs per annum for use classes B1, B2 and B8. Following their review of the current economic evidence, Arup concluded that 960 jobs per annum was a realistic average for York over the LDF period, although it would likely fall short in the short term and increase in the medium –long term due to the then current economic downturn.
- 2.2.13 The submission Core Strategy set out the spatial principles for accommodating development and identified strategic sites using the previously established drivers and shapers from the Preferred Options stage. The Spatial Principles were:
- ▶ SP1: Settlement Hierarchy;
 - ▶ SP2: Development Constraints;
 - ▶ SP3: Sequential Approach to Development.
- 2.2.14 In terms of development sites, the Core Strategy continued with a brownfield sites first policy as well as identifying areas of search for future development as outlined in the Preferred Options stage. Following these designations, the Green Belt would have endured until 2031 with any further proposed development subject to the Spatial Principles. An Allocations Development Plan

¹¹ Statement by SoS for Communities and Local Government (CLG), 6th July 2010 <https://www.gov.uk/government/speeches/revoking-regional-strategies>

Document (DPD) was intended to follow the Core Strategy using the Spatial Principles to identify other sites to meet the needs of the City.

Sustainability Appraisal

- 2.2.15 A SA was undertaken for the Submission Core Strategy by City of York Council, which drew upon the outcomes of the Preferred Options SA outcomes. This was published alongside the Core Strategy Submission consultation document in September 2011.
- 2.2.16 **Table 2.3** summarises the approach to the Core Strategy Submission and consultation responses including an overview of comments made by the SA.

Table 2.3 Summary of the SA of the Core Strategy Submission Draft

CORE STRATEGY SUBMISSION STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
Spatial Strategy	PPS1 PPS12 RSS Draft NPPF	<p>The policy approach took forward the Preferred Option. However, this was updated to reflect revisions to the housing and employment growth evidence base. The policy retained the spatial principles approach to directing growth to the most sustainable locations. Wording of the principles was refined to ensure it was applicable to the whole city rather than just to the identification of new sites. SP2's remit was also expanded to include reference to Green Infrastructure. SP3 was also refined in line with the RSS to reflect the development of sites within the Sub-regional centre first, followed by brownfield and infill development.</p> <p>Areas of search were identified as per the Preferred Options stage.</p> <p>The general extent of the Green Belt was set out in policy but the detailed Green Belt boundaries and site allocations were to be determined through a future Allocations DPD.</p>	<p>The SA continued to support the overall approach taken by the three spatial principles set out in the Spatial Strategy as per the Preferred Options stage.</p> <p>It also continued to identify positive impacts in relation to the settlement hierarchy and the Core Strategy's focus in supporting development within the Sub-Regional area primarily followed by the large villages, villages and small villages given that this would have positive impacts on social, economic and environmental objectives. .</p> <p>The SA also identified positive impacts in relation to the pursuance of urban extension to the sub-regional centre to maintain a 10-year supply of potential sites to meeting housing, employment and associated leisure requirements, particularly towards the end of the plan period.</p>	<p>Concern with the level of growth and preserving the City's special character and setting. Suggested further assessment needed to refine settlement and employment growth</p> <p>Continuing concern about the balance between levels of growth and preserving the City's character.</p> <p>Presumption in favour of brownfield sites not consistent with national policy.</p> <p>Suggestions made to refine the settlement network and roles of places.</p> <p>Criticism of approach and outcome of areas of search for development.</p>
Housing Growth	RSS PPS3 Draft NPPF	<p>RSS provided the start point. However, more recent national and local evidence regarding housing requirements refined this leading to proposal for:</p> <ul style="list-style-type: none"> 635 pa- 2011/12 to 2015/16; 855 pa - 2016/17 to 2030/31. 	<p>The SA identified that this policy approach would help to deliver enough housing to meet identified need through the evidence base. The appraisal stated that this would have positive impacts in relation to also meeting affordable housing targets and enabling people to live within York by stabilising the demand through supply. The SA identified uncertain impacts over the inclusion of windfalls as they could not be guaranteed to come forward, although it was acknowledged</p>	<p>Targets should be higher and reflect 2008 DCLG projection.</p> <p>There should not be a lower figure for early part of plan period.</p> <p>Other consultees thought growth would not materialise and targets should be lower.</p>

CORE STRATEGY SUBMISSION STAGE	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
		Local evidence base was produced by Arup to supplement the RSS given the government's intention to abolish the RSS. This reviewed the previous work alongside up-to-date statistical evidence to provide revised housing growth figures as outline above.	that they would have a positive impact in meeting need.	
Employment Growth	RSS Draft NPPF	<p>Employment Topic Paper (2011) included re-evaluated projections of the two Employment Land Reviews due to the global financial crisis. This stated that around 960 additional jobs per annum was a realistic average figure for the LDF period.</p> <p>Conclusions were based on a slightly lower employment levels compared with the previous figures however a larger margin of choice to be adopted when converting employee numbers into a land requirement for these sectors which results in a position very similar in land requirement to the earlier Employment Land Review Stage 2 (2009).</p>	<p>The policy was assessed as being positive in achieving the economic objectives set out in the SA.</p> <p>Central to the policy was the need to provide sufficient land to meet the requirements for job and business growth in the future. This related to the target to achieve a job growth of 1,000 jobs per annum. It was identified that primarily this would have positive impacts on the achievement of business success, stable economic growth and investment through the delivery of site for growth.</p>	<p>Some respondents felt that 1,000 jobs a year was too high in terms of the environmental capacity of York and unrealistic given the current economic climate, others felt that 1,000 jobs per year was inadequate and should be amended (increased) to cover a wider skills range and to include reference to the wider role York has in the region.</p> <p>Several respondents supported the conclusion that York can support a growth level of 1,000 jobs per year and to identify land for employment development.</p>

Justification for Selection of Preferred Spatial and Growth Option

The Spatial Strategy submitted within the Core Strategy predominantly followed the approach set out at the Preferred Options stage. This was refined to take into consideration the requirement of the RSS, SA commentary and consultation responses to ensure that the most sustainable approach to locating development was taken forward.

The housing growth option was amended from the Preferred Options Stage based upon revised evidence in response to the Government's intention to revoke the RSS and the global financial crisis, which was also affecting housing delivery. This new evidence base looked at previous and contemporary evidence/statistics to underpin the growth targets and suggested slight revisions to the Preferred Option Approach. These figures would be used as the final preferred option.

Similarly, the employment growth options were revised in line with updated evidence base which also took into consideration contemporary evidence to reflect up-to-date statistics and the global financial crisis. This concluded that the job figure was slightly lower than the previous options identified but overall, when taking into account choice and churn in the market, the figures were similar to the Preferred Options was reasonable.

2.2.17 The Core Strategy and its accompanying evidence base, including the SA/SEA, was submitted for examination to the Secretary of State on Tuesday 14th February 2012. It was taken to an Exploratory Meeting on 23rd April 2012 wherein the Inspector granted an extension for further works to be completed prior to an Examination in Public.

2.3 York's Local Plan

2.3.1 The decision for York to develop a Local Plan was based upon key planning policy changes and decisions in 2012:

- ▶ The Government formally introduced the new NPPF in March 2012 replacing the previous Planning Policy Statements and LDF process. The new local plan process replaced the LDF suite of documents approach in favour of the production of a plan incorporating strategic and detailed policies together with site allocations;
- ▶ The Regional Strategy for Yorkshire and Humber (Partial Revocation) Order 2013 came into force on 22nd February 2013. This followed consultation on an initial and revised Environmental Report regarding the effects of revocation of the Regional Strategy, both consulted upon on 2012. The revocation order of the Regional Strategy for Yorkshire and Humber revoked this document except for Policy YH9: Green Belts and Policy Y1: York Sub Area as well as the key diagram which showed the general extent of York's Green Belt. This was to ensure that the character and setting of the City would not be harmed through the revocation of the Regional Strategy whilst a local planning policy document was not adopted (as identified through the revocation SEA Environmental Report);
- ▶ Members granted approval of the Community Stadium. This required the reviewing of the retail evidence base/city centre policies used to underpin planning policy;
- ▶ Moving to a Local Plan would include site allocations, critical to supporting and delivering growth. Considering allocations would enable a clearer and practical focus on viability and deliverability.

2.3.2 The publication of new national planning policy and guidance meant considerable change for the requirements of a local planning policy document. In light of this, the Core Strategy was withdrawn from the Examination process on 3rd August 2012 following a Full Council meeting on 12th July 2012 wherein Members voted in favour of the production of a NPPF compliant Local Plan.

Local Plan Preferred Options (2013)

- 2.3.3 The revocation of the RSS required the plan to directly evidence the drivers of growth and determine the scale of change. Consequently, work was commissioned to re-look at housing and employment growth to ensure they were accurate, based upon current evidence and, additionally, that they reflected an integrated approach to housing and employment growth.
- 2.3.4 A comprehensive Economic and Retail Growth and Visioning Study was undertaken by consultants Deloitte to understand the implications for the whole economy during the plan period. This looked at sector as well as overall job growth. The conclusions of this set out three options for growth between 2012-2030:
- ▶ The baseline scenario: 14,471 additional jobs (based upon Oxford Economic Forecasting's assessment of global and national changes in the economy applied at the York level);
 - ▶ Scenario 1: Faster UK recovery – 20,197 additional jobs;
 - ▶ Scenario 2: Faster growth in key York sectors – 16,169 additional jobs.
- 2.3.5 **Scenario 2 reflected the Council's ambitions as set out in the York Economic Strategy. It was also felt to be the most realistic in terms of reflecting the national economy. This option was therefore adopted as the preferred strategy for the lifetime of the plan.**
- 2.3.6 Consultants Arup were re-commissioned to establish whether the housing growth targets were still valid following the previous work of the Core Strategy and in light of the economic evidence base. Based upon this review, the following options for housing growth were identified:
- ▶ Option 1: Baseline of 850 dwellings per annum ('Policy-off' scenario based upon projected population growth);
 - ▶ Option 2: 1,090 dwellings per annum (To support the economic visioning evidence base and representing an integrated approach to housing and employment growth);
 - ▶ Option 3: 1,500 dwellings per annum (To meet housing and employment growth as well as newly arising affordable housing need);

- ▶ Option 4: 2,060 dwellings per annum (To meet housing and employment growth as well as existing and newly arising affordable housing need).

- 2.3.7 **The housing growth option chosen to taken forward was Option 2. The testing of higher growth options showed that they were unlikely to be realistically deliverable.** This equated to provision of at least 21,936 dwellings to be delivered between 1st October 2012 and 31st March 2030.
- 2.3.8 The spatial strategy continued to be underpinned by the spatial principles set through the Core Strategy process. Shapers of growth were amended to reflect current evidence within the City but remained as the Historic Character and Setting, Flood Risk and Green Infrastructure. The options for the spatial distribution of growth considered at the Preferred Option Stage, consistent with the Core Strategy principles were:
- ▶ Option 1: Prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement;
 - ▶ Option 2: Prioritise development within and/or as an extension to the urban area and through provision in the villages subject to levels of services;
 - ▶ Option 3: Prioritise development within and/or as an extension to the urban area and through the provision of new settlements;
 - ▶ Option 4: Prioritise development within and/or as an extension to the urban area along key sustainable transport corridors.
- 2.3.9 A number of the factors that influenced both the preferred policy option and the alternatives reflected a considerable body work including the North Yorkshire Strategic Housing Market Assessment, Strategic Housing Land Availability Assessment, population growth projections and future housing demand scenarios, the York Economic and Retail Vision Work, and earlier Sustainability Appraisals.
- 2.3.10 The principle of a Green Belt around York is long established and was confirmed through the RSS adopted in 2008. Although the RSS was partially revoked, the policies that deal with the York Green Belt remained in force. The purposes of the Green Belt are set out within the NPPF which states that in drawing Green Belt boundaries, local planning authorities should have regard to their permanence beyond the plan period and to promoting sustainable patterns of development.
- 2.3.11 Whilst some of the outer boundaries of the Green Belt were agreed with adjoining authorities; it was recognised that the Local Plan would need to set out the purpose of the Green Belt and should finalise the inner boundary and those parts of the outer boundary that lie within York's authority. The options considered for the role of York's Green Belt were:
- ▶ Option 1: Identify 'preserve the setting and special character of York' as the primary purpose of York's Green Belt (Preferred Approach)
 - ▶ Option 2: Give equal weight to all Green Belt Purposes identified in National Planning Policy Framework (NPPF)
- 2.3.12 The NPPF also requires that in defining the boundary it is important to ensure that the extent of the Green Belt takes account of the longer term development requirements of the city and at the same time ensures that it properly addresses the purposes for which is has been created. Therefore, it was identified that the full needs of the housing and employment land during the plan period should be met without compromising the integrity of the Green Belt and which would endure for at least 25 years. Options for the safeguarding of land for the longer term development therefore needed to be determined. The options for considering this within the lifetime of the green Belt were:
- ▶ Option 3: Identify sufficient development sites for the duration of the Green Belt (at least 25 years); and
 - ▶ Option 4: Identify sufficient development sites for the duration of the plan (15 years), safeguarding land to provide options for future consideration during the lifetime of the Green Belt (a further 10 years) (Preferred Approach).

Sustainability Appraisal

2.3.13 SA of the Preferred Options Local Plan was undertaken jointly by City of York Council and AMEC.¹² This was published alongside the Local Plan Preferred Options Consultation document in Summer 2013. **Table 2.4** summarises the Local Plan Preferred Options stage and consultation responses, including an overview of comments made by the SA.

Table 2.4 Summary of the SA of the Local Plan Preferred Options

LOCAL PLAN PREFERRED OPTIONS	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
Spatial Strategy - Drivers and Shapers	NPPF	<p>Drivers: Housing and employment growth (see below)</p> <p>Shapers: As previously identified in the Core Strategy – historic character and setting, flood risk and green infrastructure.</p> <p>Option 1: Prioritise development within and/or as an extension to the urban area and through the provision of a single new settlement;</p> <p>Option 2: Prioritise development within and/or as an extension to the urban area and through provision in the villages subject to levels of services;</p> <p>Option 3: Prioritise development within and/or as an extension to the urban area and through the provision of new settlements;</p> <p>Option 4: Prioritise development within and/or as an extension to the urban area along key sustainable transport corridors.</p> <p>24 strategic sites were identified to meet the spatial strategy and housing/employment growth targets.</p>	<p>Broadly the assessment identified that those options which comprise the preferred spatial strategy would have a positive effect across many of the SA Objectives but with positive effects being significant in relation to economy, equality and accessibility, biodiversity, land use, cultural heritage and landscape.</p> <p>The preferred option would help to define the role and economic priorities of the York Sub Area and the spatial distribution of development is expected to meet overall housing and employment land requirements for the City. This spatial approach may improve the viability and vitality of the City Centre. Overall, none of the reasonable alternatives assessed as part of the SA were considered to perform better, in sustainability terms, than the preferred options that comprise the proposed spatial strategy.</p>	Representations related to the broad range of spatial strategy driver and shapers.
Spatial Strategy –	NPPF	Two options were considered for the Role of the	Options 1 and 2 were assessed as both having predominantly significant positive or minor positive effects. However, Option 1 scored	In general there was support for the Green

¹² The SA Report accompanying the Preferred Options Local Plan can be found here: http://www.york.gov.uk/download/downloads/id/2238/sustainability_appraisal.pdf with associated appendices here: http://www.york.gov.uk/download/downloads/id/2240/sustainability_appraisal_-_appendices.pdf

LOCAL PLAN PREFERRED OPTIONS	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
<p>Approach to Green Belt</p>		<p>Greenbelt to determine its primary purpose:</p> <p>Option 1: Identifying the historic character and setting as the primary purpose</p> <p>Options 2: give equal weight to all purposes identified in the NPPF</p> <p>A further two options were also considered relating to ensuring a permanent greenbelt through identifying development safeguarded sites within the Local Plan</p> <p>Evidence is based upon:</p> <ul style="list-style-type: none"> - The Approach to the Green Belt Appraisal (2003) - Historic Character and Setting Technical Paper (2011) - Saved policies of otherwise revoked RSS 	<p>better in terms of objectives 14 and 15 reflecting the specific purpose of this option to preserve the historic character and setting of York.</p> <p>Option 2 was identified as having a minor positive for these objectives given that specific emphasis was not placed upon preserving these characteristics. In addition, option 1 was appraised as having a minor negative effect on objectives 1 (housing) and 4 (employment) given that it could potentially limit the extent of land available to accommodate growth. The Preferred Approach therefore was appraised to perform better than the reasonable alternative.</p> <p>Out of the two alternatives, Option 4 would safeguard a range of sites in the Green Belt that may be required to meet longer term development needs (i.e. beyond the plan period) including for housing and employment. Relative to Option 3, this option had the potential to provide a greater degree of flexibility in respect of site choice in the future and, by extension, the ability of Plan reviews to respond to changes in the socio-economic and environmental baseline whilst helping to ensure that the Green Belt endures beyond the plan period. In consequence, the option was assessed as having positive effects across the majority of SA objectives.</p>	<p>Belt to be established in York.</p> <p>However, there was a mixed response with regards to how the Green Belt would be defined and what sites would be excluded for safeguarding purposes.</p>
<p>Housing Growth</p>	<p>NPPF</p>	<p>Arup review of evidence that underpins objectively assessed need. Options considered ranged from 850 – 2060. Preferred option - 1090.</p> <p>The policy approach also included preferred options and reasonable alternatives for housing supply buffer (preferred approach of 15% with alternatives of 5%, 10% and 20%), phasing and delivery (preferred approach of providing local level policy to guide phasing of development, market led approach), housing density approach (preferred option for housing density targets to vary by location). The</p>	<p>The preferred approach was assessed as having a positive effect across several SA Objectives with a significant positive effect identified in respect of housing. The preferred option was not assessed as having any significant negative effects. The assessment identified the potential for housing growth have minor negative effects on a range of objectives including health, climate change, water, waste and resource use and air quality. These negative effects could be reduced through mitigation measures/Local Plan policies and directing housing to locations which reduce the need to travel and avoid locations which could exacerbate existing health issues e.g. AQMAs.</p> <p>The SA Report concluded that on balance the preferred approach was considered to perform better, in sustainability terms, than the reasonable alternatives. Higher levels of growth may further enhance positive effects on socio-economic SA Objectives</p>	<p>Provide local level policy to guide phasing of development and provide an allowance for windfall sites</p> <p>2011 household projections will lead to an undersupply of homes.</p> <p>The Council should plan more positively and aspire to the higher housing figures of Option 3 (1,500 dwellings) or Option 4 (2,060 dwellings) to meet economic and affordable housing needs.</p> <p>Provision should be lower – below 850 per year and give priority to brownfield sites.</p> <p>The persistent record of under delivery of housing means the Council should be looking at a 20% buffer.</p>

LOCAL PLAN PREFERRED OPTIONS	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
		preferred density targets were <40dph, 40-50dph and >50dph. No alternatives were proposed for this specific policy area.		
Employment	NPPF	Deloitte were commissioned to undertake an Economic and Retail Visioning and Forecasting Study. The preferred option represents a 'policy on' scenario based upon faster growth in advanced manufacturing, science and research, financial and professional services, and tourism and leisure to support 16,169 additional jobs. The alternative option involved a baseline scenario based upon Oxford Economic Forecasting's assessment of national changes Applied to York this equates to 14,1471 jobs. Preferred options and alternatives were also presented for economic growth in the health and social care sectors, loss of employment land and business and industrial uses within residential areas.	<p>The SA identified that the preferred approach would have a positive effect on several SA Objectives with positive significant effects in relation to education and the economy. The preferred option would deliver an estimated 16,169 jobs over the plan period facilitating faster growth in advanced manufacturing, science and research, financial and professional services and tourism and leisure sectors. Allied with other elements of the approach, including the protection of existing employment land and providing criteria to facilitate growth in health and social care sectors, this was expected to support the York fulfilling its role as a key economic driver.</p> <p>The preferred approach was not assessed as having any significant negative effects on any of the SA Objectives. However, the assessment did conclude that economic growth could have minor negative effects on objectives relating to climate change, water, waste and resource use and air quality.</p> <p>Overall, those options which comprised the preferred approach were considered to perform better, in sustainability terms, than the reasonable alternatives. In particular this reflected the reduced scale of economic growth envisaged under the baseline scenario. It was recommended that the preferred approach included adequate environmental safeguards to protect the environment from any adverse impacts associated with growth in the healthcare and social care sectors.</p>	

Justification for Selection of Preferred Spatial and Growth Options

The Preferred Option Spatial Strategy took forward Option 3 to provide a balanced approach to the identified spatial principles. This continued to use the Spatial Shapers as outlined through the Core Strategy Process. This approach was supported through previous work and corroborated through the Visioning workshops undertaken as part of the Local Plan process. The Spatial Shapers remained as Historic Character and Setting, Flood Risk, Green Infrastructure (including nature conservations sites and openspace) and Transport and Access to Services.

Further work was undertaken to update the housing and employment growth assumptions. It was recognised that a collaborative approach should be taken between the two growth assumptions to ensure sustainable growth patterns. The Options put forward for employment growth were a result of up-to-date evidence base work looking at all employment sectors. The Preferred Approach (Scenario 2) was chosen as it reflected the Councils ambitions as set out in the York Economic Strategy, which was reflected in the Local Plan Vision. It was also felt to be realistic in terms of national economic performance and was therefore adopted as the preferred strategy for the lifetime of the plan. Housing growth assumptions were revised to take into consideration updated statistical evidence available relating to household and population projections to understand the revised trend-based position. This was then updated to consider the preferred economic scenario and further objectives to reduce in-commuting and increase the level of affordable housing. The preferred approach took forward option 2, which provided a scale of housing growth to support the preferred employment growth forecast. This was considered to provide the choice for those who may take up new jobs to reside in York rather than commute into the district. The preferred approach represented an integrated approach to housing and employment growth to ensure a consistent and holistic policy stance in the Plan.

LOCAL PLAN PREFERRED OPTIONS	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
<p>Taking into account the Spatial Drivers and Shapers, the package of sites identified within the Plan represented the sites which were considered to comprise the most suitable, available and deliverable when assessed against the Local Plan Vision and the requirements of NPPF. Option 1 was taken forward which prioritised development within and/or as an extension to the urban area and the provision of a single new settlement as this best met the criteria set out through the Spatial Strategy. To meet this requirement 24 strategic sites (including 1 new settlement) were identified along with 45 housing allocations and 13 employment allocations. For housing specifically this meant 19% was supplied within the main built up area, 42% within urban extensions, 29% within the new settlement (Whinthorpe ST15) and 10% within villages, including two strategic sites.</p> <p>The preferred spatial approach also considered the role of Green Belt in York and identified that its primary purpose should be to protect the historic character and setting of the York (Option1). It would also help to regulate the form and growth of the city and other settlements in a sustainable way and would perform the role of checking sprawl, safeguarding the countryside from encroachment and encourage the reuse of urban land helping to retain the character and setting of the city. In addition, Safeguarded Land was identified as per option 2 to identify sufficient development sites for the duration of the plan, safeguarding land to provide options for future consideration during the lifetime of the Green Belt (a further 10 years). This was to ensure that the Green Belt defined in the Local Plan endured well beyond the end of the Plan Period. It was necessary to exclude land from the Green Belt that could be held in reserve and considered for development when the Plan is reviewed in line with the requirements of NPPF and forecast long-term housing and employment needs.</p>				

Identification and Analysis of Sites

- 2.3.14 A 'Call for Sites' consultation asked landowners, developers, agents and the public to submit sites which they thought had potential for development over the next 15-20 years. The consultation ran between 29th August and 12th October 2012 and nearly 300 individual site submissions were received for a range of uses, all of which had willing landowners.
- 2.3.15 In conjunction with the sites submitted through the Call for Sites process, further sites previously submitted to the Council for consideration through the LDF, including the Call for Sites 2008, Strategic Housing Land Availability Assessment (SHLAA) and Core Strategy consultations, were included. Whilst no up-to-date information on these sites may have been submitted, it was deemed that there was previously an intention to develop the land and that this was worth reconsidering in the new assessment. Sites with existing or lapsed consent for residential or commercial use were also included. The total number of land parcels taken forward for consideration was 732.
- 2.3.16 In order to identify those site allocations for inclusion in the Local Plan, a site selection methodology was devised using a combination of desktop GIS analysis and more detailed assessment at Member and officer workshops. The GIS component of the assessment utilised a four stage process using criteria to identify the most sustainable sites for further, more detailed consideration. Stages 1-3 included the spatial shapers (historic character and setting, which includes the Green Belt purposes; nature conservation designations; and open space and flood risk) followed by an assessment of access to services and transport at Stage 4. All sites were also subject to a supplementary assessment of environmental considerations to understand more about key assets or issues within their vicinity.
- 2.3.17 Following this process, residual sites (and sites with revised boundaries following the application of constraints) were appraised by internal officer and Member workshops for site specific comments before being allocated. For large sites over 5 hectares, whilst the Stage 4 criteria 'access to services and transport' was applied, a judgement that these sites would have the ability to provide additional services to serve any new potential community was made and debated at technical officer workshops. **Table 2.5** summarises the criteria used in Stages 1 – 4 of the assessment process.

Table 2.5 Initial Site Selection Criteria

Criteria
<p>Criteria 1: Environmental Assets Protection</p> <p>Is the site wholly or partly within:</p>

<p>Criteria</p> <ul style="list-style-type: none"> • Historic Character and Setting, which included the Green Belt purposes • High Flood Risk (Zone 3b) • Statutory Nature Conservation designations (SACs, SPAs, SSSIs, RAMSARs) • Regional Green Infrastructure Corridors • Sites of Special Interest for Nature Conservation (SINC) • Local Sites of Nature Conservations Interest (LNRs) • Ancient Woodland <p>(Site boundary amended as appropriate)</p>
<p>Criteria 2: Open space Retention</p> <p>Is the site or does it contain existing open space?</p> <p>(Site boundary amended as appropriate)</p>
<p>Criteria 3: Greenfield and High Flood Risk Protection</p> <p>Is the site greenfield and within Flood Zone 3a?</p> <p>(Site boundary is amended as appropriate)</p>
<p>Criteria 4a: Access to Facilities and Services</p> <p>Is the site within distance of facilities and services?</p> <p>(NB: specific distances relate to facility or service)</p>
<p>Criteria 4b: Access to Transport</p> <p>Is the site within distance of transport modes/routes?</p> <p>(NB: specific distances relate to mode of transport/routes)</p>

- 2.3.18 The Call for Sites exercise allowed for the submission of all types of land uses including residential, employment and retail development as well as ‘specialist’ development uses such as renewable energy, education, waste and minerals and GI. The ‘specialist’ sites were removed from the analysis at this stage and were assessed separately through the Local Plan process for their suitability for that specialist use. Those sites that were submitted for the main development purposes of residential, employment and retail were grouped together. To give the best opportunities for site choice, these sites were assessed for all potential built purposes (residential, employment or retail) for the next stage of the assessment.
- 2.3.19 All sites were analysed individually. However, in order to create the best opportunities for sustainable sites, where possible, individual sites were amalgamated into larger sites where they were adjacent to each other or overlapping.
- 2.3.20 A number of sites within the assessment already had planning consent for development and it was therefore deemed appropriate to remove these sites from the assessment process as a decision had already been made regarding their suitability for development purposes. It was also considered inappropriate to amalgamate these sites with those without consent.
- 2.3.21 **Table 2.6 and Table 2.7** summarise the outcome of the initial site screening process and highlights the number of sites taken forward for consideration at the Preferred Option Stage.

Table 2.6 Sites Taken Forward for Consideration at Preferred Options Stage

Stages	Number of Sites
Sites identified through the Call for Sites process	732
Sites removed for specialist uses	-25
Sites removed as with planning permission or already complete	-256*

Removal of amalgamated sites	-173
Total number taken forward for analysis	273

* An additional five sites with planning permission were over 5 hectares and were therefore carried forward as strategic sites.

Table 2.7 Sites Removed Through Analysis

Stage of Assessment Process	Number of Sites Removed
Total number of sites taken forward for analysis	273
Criteria 1: Environmental Assets Protection	-50
Criteria 2: Openspace Retention	-29
Criteria 3: Greenfield and High Flood Risk Protection	-2
Site size: Under Threshold	-43
Site size: Over 100ha	-2
Sites taken forward to Criteria 4	152*
Sites removed at Criteria 4	20
Sites taken forward for specialist workshops	132

* The figure includes the additional five sites with planning permission carried forward as strategic sites (removed from the previous table but included for completeness).

2.3.22 A specialist Technical Officer Group was utilised to obtain site specific information on each of the sites that passed the initial screening process. Concurrently, the sites were analysed for their viability in the context of the Preferred Options. The outcomes of both of these processes informed the selection of strategic sites and allocations within the Preferred Options Local Plan. Following consideration by the Technical Officer Group, of the 132 sites assessed, a total of 83 sites were identified as proposed allocations in the Preferred Options Local Plan (see **Table 2.8**). Please note that the number of strategic sites includes 5 sites with planning permission.

Table 2.8 Number of Sites Allocated in the Preferred Options Local Plan

Site Allocations	Number
Strategic Sites Total	24*
Comprising:	
Mixed use: employment/housing	2
Housing	17
Employment	3
Retail	1
Leisure	1
Additional Housing Allocations Total	45
Additional Employment Allocation Total	14
Safeguarded Land Sites	8

* This includes sites with outstanding planning permission over 5 ha removed from the analysis.

2.3.23 In addition, eight safeguarded land parcels were identified to meet long-term development pressures and enable the Green Belt to be set with a fair degree of permanence beyond the Plan period to ensure the preservation of the special character of York.

Further Sites Consultation (June/July 2014)

- 2.3.24 Further sites, amendments to boundaries and new evidence for preferred site allocations were received through the Preferred Options consultation for consideration as part of the site selection/allocations process. Any new sites were subject to the site selection methodology above and where successful, were taken to Technical Officer Group for further comments to ensure a fair and equal testing of all possible sites. Where site amendments or further evidence had been received, this was also taken to the Technical Officer Group for further discussion. The outcomes of this process were presented as part of the Further Sites Consultation (June/July 2014). This was focussed on presenting:
- ▶ New residential and employment/retail sites with potential;
 - ▶ Changes to strategic sites and smaller (local) allocations;
 - ▶ The Council's requirements for safeguarded land and identifying new sites;
 - ▶ Identifying new strategic sites for open space;
 - ▶ The renewable energy methodology and identified potential sites;
 - ▶ The Gypsy, Roma, Traveller and Travelling Showpeople Accommodation Assessment;
 - ▶ New sites for educational purposes; and
 - ▶ New sites for transport purposes.
- 2.3.25 It identified that an additional seven sites had potential for housing and three sites had potential for employment use. In addition, amendments to some of the Preferred Options allocations and strategic sites were consulted on to reflect received consultation responses and evidence base submitted.

Draft Local Plan Publication document presented to Local Plans Working Group and Executive (2014)

- 2.3.26 Council officers prepared a draft Local Plan for publication for presentation to the Local Plan Working Group (LWPG) and Executive in September 2014. 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. The Local Plan Publication document predominantly maintained the spatial strategy set out in the Preferred Options Local Plan, which had been confirmed following retesting of the Local Plan evidence base. Each of the key influences that underpinned the spatial strategy set out in the 2014 Local Plan Publication document are discussed in turn below and together document the process of the selection of the preferred development option and rejection of alternatives.
- 2.3.27 The Local Plan Publication document predominantly followed the Preferred Options approach. Inputs into the draft plan were influenced by updated evidence base and testing of site allocations at the previous stages.

Spatial Drivers

Economic forecasts

- 2.3.28 Work on the City of York Local Plan drew on Econometric Forecasts from Oxford Economic Forecasting (OEF) to support the economic and housing components of the Plan through the *Economic and Retail Growth and Visioning Study (2013)*. At the Preferred Options stage three different economic scenarios were tested:
- ▶ The baseline scenario: 14,471 additional jobs (based upon OEFs assessment of global and national changes in the economy applied at the York level);
 - ▶ Scenario 1: Faster UK recovery – 20,197 additional jobs;

- ▶ Scenario 2: Faster growth in key York sectors – 16,169 additional jobs.

- 2.3.29 The publication in December 2013 of the draft Strategic Economic Plans by the two LEPs of which York is a partner revealed that there was a difference of view on York's economic future when the Experian/REM forecast when compared to the OEs forecast used in the Local Plan. Since that time work has been carried out to analyse and understand the reasons for these differences. This involved discussions with the two forecasting houses and support from the Regional Economic Intelligence unit in Leeds. In addition, a third trend based forecast was obtained from Cambridge Econometrics to help compare the economic forecasts and mitigate the risk later in the process for further economic testing.
- 2.3.30 The analysis of the differences between the models is that the overall scale of growth within the Experian/REM model is 6 months earlier than the Oxford model and as a consequence is more pessimistic. Once these were updated, the outcomes of this forecast were found to be much closer to the OE model. The Council therefore decided to continue using the OE forecasts in the Local Plan. The close alignment of the two models is considered to show as accurate a forecast as possible to underpin the Local Plan. It was considered that the scenarios presented at the preferred Options stage remain reasonable alternatives.
- 2.3.31 However, the review of these figures highlighted that the most realistic scenario was the baseline forecast. The Submission Local Plan (2014) therefore took forward the baseline scenario as opposed to scenario 2 as at the Preferred Options stage. Scenario 2 represented stronger growth in York sectors which would have added an extra 1,500 additional jobs to the trend based baseline position whereas the updated evidence shows that the York economy now supports nearly 113,000 jobs and a trend based forecast of growth to 2030 with an additional 13,500 jobs. This forecast was used to provide the basis for determining the range and scale of land requirements within the Plan through an analysis of how sector growth feeds in to use class requirements. Overall, approximately 160,000m² of floorspace was required to meet the economic requirements.

Housing Requirements

- 2.3.32 Consultants, Arup, were commissioned to revisit their work regarding housing requirements from the Preferred Options stage in light of the updated employment forecasts and new Government Statistical sources such as the 2012 based population projections. These influenced the revised options for housing growth in the following way:
- ▶ The more recent ONS forecasts of population growth and the associated household forecasts provided by DCLG were influenced by the post 2008 recession and may have underestimated future rates of growth. It was Arup's opinion that an improving position should be assumed in the longer term.
 - ▶ The Oxford Econometrics model of economic growth was validated using other models as stated previously. The trend based forecast was more optimistic than their previous forecasts.
 - ▶ Household formation and size assumptions were revised based upon newly release population projections.
- 2.3.33 These factors meant that the baseline figure for housing growth were lower than the ones derived from the forecasts at the Preferred Options stage (1,090 dwellings per annum).
- 2.3.34 The revised options considered for housing growth as a result of the above were:
- ▶ Option 1: 850 dwellings per annum (Demographic trend led forecast);
 - ▶ Option 2: 869 dwellings per annum (Economic led forecast).
- 2.3.35 Although options 1 and 2 set out the trend based requirements, the guidance is clear that housing requirements must take account of objectively based need. To consider this, a review of the Strategic Housing Market Assessment (SHMA) was undertaken, which concluded that the outcomes of the original assessment, that 790 affordable homes per annum were required to address both forecast requirements and the backlog, was a robust estimate. Consideration of how

this could be delivered in the context of maintaining a realistic position on the delivery of new homes was taken forward in a separate policy.

2.3.36 Additionally, further provision was required to address the backlog from previous under delivery of housing. This equated to an additional 126 homes per annum on top of the trend based options. It was recognised that this need could be met within the first 5 years of the plan given the uplift that would be required during this time. Consequently, this requirement was incorporated into the housing delivery requirements over the plan period.

2.3.37 The following option was taken forward:

- ▶ Option 3: 995 dwellings per annum (objectively assessment need (126 dwellings pa) including economic led scenario (869 dwellings pa).

2.3.38 This option equated to a requirement to accommodate 16,980 dwellings over the lifetime of the plan. In addition, a 20% buffer was added to the supply of housing providing an uplift of 174 dwellings per annum for the first 6 years to address previous under provision as required by the NPPF. The target overall was 995 dwellings per annum over the lifetime of the plan therefore but within the first 6 years, the supply would accommodate 1,170 dwellings.

Spatial Shapers

2.3.39 Components of the Spatial Strategy were carried forward from the Preferred Options stage. These continued to inform the decisions made in the site selection process as they provided an overarching narrative for the factors which shape the choices in how York accommodates growth.

Sites Allocations Identification

2.3.40 There were 4 key decision-making criteria considered during the process of determining site allocations:

- ▶ **Suitability** – established using through the Site Selection Methodology established at the Preferred Options stage;
- ▶ **Deliverability** – established through the submission of a site by a willing landowner to the Council for consideration for its potential for development during the Call for Sites (2012), Preferred Options Consultation (2013) and the Further Sites Consultation (2014) as well as, for Strategic Sites, through the Strategic Site Delivery Framework. This reflects the NPPF requirement for sites to be deliverable.
- ▶ **Viability** – established through the PBA Viability Study (2013 and updated in 2014) and for Strategic Sites, through the Strategic Site Delivery Framework.
- ▶ **Meeting Need** – established through the Spatial Drivers (Housing and Employment Need).

2.3.41 The site selection work carried out at the Preferred Options stage and Further Sites Consultation led to a total 836 sites being assessed for their development potential. The outcome of this process are outlined in **Table 2.9**.

Table 2.9 Site Selection Process

Stages	Number of sites Considered
All sites considered for residential purposes	836
Sites superseded as consequence of change to the general extent of the site being considered	-16
Sites removed from process at Preferred Options	-449
Sites removed at :	
Criteria 1: Environmental Assets protection (PO stage)	-50
Criteria 1: Environmental Assets protection (FSC stage – excluding resubmitted sites)	-19
	(69)

Stages	Number of sites Considered
Criteria 2: Open space retention (PO Stage)	-29
Criteria 2: Open space retention (FSC stage - excluding resubmitted sites)	-2 (31)
Criteria 3: Greenfield and high flood risk protection (PO stage)	-2
Criteria 3: Greenfield and high flood risk protection (FSC stage - excluding resubmitted sites)	0 (2)
Site size: Under threshold (PO stage)	-43
Site size: Under threshold (FSC stage - excluding resubmitted sites)	-1 (44)
Site size: Over 100ha (PO stage)	-2
Site size: Over 100ha (FSC stage - excluding resubmitted sites)	-2 (4)
Sites taken forward to Criteria 4 (PO stage)	152
Sites taken forward to Criteria 4 (FSC stage - excluding resubmitted sites)	18 (170)
Sites removed at Criteria 4	20
Sites removed at Criteria 4	15 (34)
Sites taken forward for specialist workshops (PO stage)	132
Sites taken forward for specialist workshops (FSC stage - excluding resubmitted sites)	3 (135)

2.3.42 The number and type of allocations set out in the Local Plan Publication are summarised in **Table 2.10**.

Table 2.10 Number of Sites Allocated in the 2014 Local Plan Publication Draft

Site Allocations	Number
Strategic Sites Total	28*
Comprising:	
Mixed use: employment/housing	1
Housing	20
Employment	7
Leisure	1
General Housing Allocations	46
General Employment Allocation	13
Safeguarded Land Sites	13

* This includes sites with outstanding planning permission over 5 ha removed from the analysis.

2.3.43 The Viability Study released alongside the Preferred Options included gross:net and density assumptions based on a zoned approach across the city. These assumptions were revised for general housing sites in an updated report to accompany the Local Plan Publication draft (2014).

2.3.44 In addition the Sustainability Appraisal was used to inform the decisions made in the Plan to determine the extent of the York Green Belt, including the detailed inner. This process was informed by an assessment of the setting and character of York.

2.3.45 To ensure an enduring Green Belt, land was safeguarded at the 2014 Publication draft Local Plan stage to provide choice in respect of accommodating development requirements beyond the Plan Period. Safeguarded land is a term used in the NPPF for land which is excluded from the Green Belt to provide a reserve of sites that can be considered for development when a Plan is reviewed. Boundary changes proposed to several Strategic Sites meant that the amount of safeguarded land identified at the Preferred Options Stage was reduced and needed to be replaced to ensure flexibility.

2.3.46 Consultation responses included a number of suggestions for new sites that were considered for safeguarded land. These sites were tested in the same way as other site considered through the Site Selection Methodology. This ensured equitable comparison of all the sites that were proposed for development by interested parties. However, the sites were only tested against the Spatial Shapers (Criteria 1-3) given that Safeguarded Land would only be able to come forward following a review of the plan and during that time, access to services and facilities may have changed. In total 13 areas of safeguarded land were identified.

Sustainability Appraisal

2.3.47 The SA of the Local Plan publication draft was undertaken jointly by the City of York Council and AMEC (now Amec Foster Wheeler). **Table 2.11** summarises the Local Plan publication draft stage policy approach, supporting evidence and an overview of comments made by the SA. Please note that there are no consultation responses, as a motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken.

Table 2.11 Summary of the SA of the 2014 Local Plan Publication Draft:

LOCAL PLAN Submission (Publication Draft)	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
Drivers of Change	NPPF	<p>A more comprehensive spatial strategy was set out, covering the drivers of growth and factors that shape growth in the city, alongside the scale of growth and the key areas of change and opportunity that would support the delivery of the strategy (including policies on the city centre, York Central, Castle Piccadilly and strategic sites).</p> <p>Strategic sites development principles policy was deleted. The issues were covered in individual policies for the four largest strategic sites and a new placemaking policy in the design section.</p>	<p>Overall, the policies in the spatial strategy were appraised as having a significant positive effect on those SA objectives relating to housing, health, economy and equality and accessibility. Minor positive effects were expected against education, climate change, biodiversity, water, waste, cultural heritage and landscape SA objectives.</p>	<p>None.</p> <p>A motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken.</p>
Scale of Housing Growth	NPPF	<p>City of York Housing Requirements in York: Evidence on Housing Requirement in York Update (2014) produced by Arup</p> <p>Provide a minimum annual provision of 996 new dwellings over the plan period.</p> <p>During the first six years of the plan (five post adoption) a 20% buffer would be applied to this figure equating to a delivery of 1170 dwellings per annum.</p> <p>Additional delivery to help address the City's affordable housing need will be encouraged.</p>	<p>The scale of provision meant that a range of housing could be provided (particularly affordable housing) to meet the objectively assessed needs of the City. This would enable the building of strong, sustainable communities through 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).</p> <p>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</p>	<p>None.</p> <p>A motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken.</p>

LOCAL PLAN Submission (Publication Draft)	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
			(particularly affordable housing) to meet specific needs.	
Scale of Employment Growth	NPPF	<p>The Economic Outlook for York (2014) Oxford Economics</p> <p>Oxford Economic Forecasting (OEF) produced a series of projections for the period 2013 to 2030. The trend based projection showed the workforce growing from 112,857 to 126,412 and GVA growth of 2.8% per annum. This equated to over 13,500 additional jobs which could be created in the city. As a further test of their robustness this forecast was compared with forecasts from Experian/REM and Cambridge Econometrics. All three forecasts showed a similar scale of job growth.</p> <p>Because of the degree of uncertainty in economic forecasting, the Plan took a cautious approach and used the trend based forecast to inform the land requirements in the Plan. This was still consistent with the ambitions of the city's economic strategy.</p>	<p>Policy EC1: made provision for a range of employment development during the plan period including the identification of 144,000m² strategic sites for Research and Development, light industrial, storage and distribution, leisure uses and further employment sites to meet the forecast demand.</p> <p>The delivery of the identified sites would enhance the competitiveness of York. The implementation of the policy was assessed as helping to increase employment land and create significant employment opportunities to support sustained economic growth.</p> <p>Overall the policies were appraised as having a positive effect on the SA Objectives</p>	<p>None.</p> <p>A motion was submitted to Full Council in October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken.</p>

- 2.3.48 The Local Plan submission document was considered at Local Plan Working Group on 22nd September 2014 and approved at Cabinet on 25th September 2014. However a motion was submitted to Full Council on 9th October 2014, which halted proceeding to the Publication Draft consultation whilst further work was undertaken.
- 2.3.49 The Council resolution of Council on 9th October 2014 stated that the draft local plan approved by Cabinet on the 25th September 2014 'does not accurately reflect the evidence base and is therefore not based on objectively assessed requirements, is not the most appropriate strategy and has ignored reasonable alternatives rather than to test the approach against them and is not deliverable over the plan period and is contrary to the combined methodological approach of the Leeds City Region'.
- 2.3.50 The motion also states that 'Council believes that the current proposals fail to adequately reflect the results of the citywide consultations undertaken in July 2013 and July 2014' and that 'the current proposals will result in the plan being found unsound by the planning inspector leaving the city vulnerable'.
- 2.3.51 In response to the Council resolution and following the Local Government Elections in May 2015 where an agreement between the Conservative and Liberal Democrat Groups was to establish a joint administration for City of York Council from May 21st 2015, that included a commitment to "prepare an evidence-based Local Plan which delivers much needed housing whilst focusing development on brownfield land and taking all practical steps to protect the Green Belt and the character of York". Officers initiated a work programme cumulating in the Local Plan – Preferred Sites 2016 document.

Local Plan Preferred Sites Consultation (2016)

- 2.3.52 The Council undertook a Preferred Sites Consultation between 18th July 2016 and 12th September 2016. The Preferred Sites Consultation 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.
- 2.3.53 The Local Plan Preferred Sites Consultation document drew on the previous stages of consultation and technical work undertaken to support the plan. Its purpose was to allow the public and other interested parties to comment on additional work relating to housing and employment land need and supply.

Housing Need

- 2.3.54 In Autumn 2015 the Council commissioned consultants GL Hearn jointly with Ryedale, Hambleton and the North York Moors National Park Authority to undertake a Strategic Housing Market assessment (SHMA). This was a study which aimed to provide a clear understanding of housing needs in the City of York area.
- 2.3.55 The report took account of 2012 based Sub-National Population and Household Projections as well as more recent migration data (Mid Year Population Estimates 2013 and 2014, ONS) and improvements to household formation rates for younger households (25-34 yr age group). The SHMA (2016) concluded the overall full objectively assessed need for housing over the 2012 to 2032 period to be 841 dwellings per annum.

SHMA Addendum – Implications of the 2014 based Sub National Population Projections released 25th May 2016

- 2.3.56 GL Hearn produced an addendum to the main SHMA report to take account of the 2014 based sub national population projections (SNPP) released in May 2016. The addendum briefly reviewed key aspects of the projections and highlighted what level of housing need is implied by the new information.
- 2.3.57 The 2014 based SNPP showed a higher level of population growth than suggested by the 2012 based versions or the main projection developed in the SHMA. However due to differences in the age structure there was not a direct link between the differences in population growth and household growth/housing need.
- 2.3.58 Modelling the 2014 based SNPP in a consistent manner to the SHMA (and including a market signals adjustment) suggested a need for some 898 dwellings per annum in the 2012 to 2032 period – this is about 7% higher than derived in the main SHMA – a need for 841 dwellings per annum. However there were some concerns relating to historic growth within the student population and how this translates into SNPP projections. This looked to be a particular issue in relation to the new 2014 based SNPP where there was relatively strong growth in some of the student age groups when compared to the previous 2012 projections.
- 2.3.59 Some consideration was given by GL Hearn to longer term dynamics although they caveated this to recognise that the evidence suggests some shift in migration patterns over the more recent years. A 10 year migration trend sensitivity test using the latest available evidence calculated a need for 706 dwellings per annum, although this does not fully reflect some of the more recent trends. GL Hearn recommended that this is not an appropriate starting point for which to assess housing need although it is useful to help identify the bottom end of a reasonable range. Given that the main SHMA document identified an objectively assessed need for 841 dwellings per annum which sits comfortably within the range set out in the SHMA addendum (706 to 898 dwellings per annum), it was recommended by GL Hearn that the Council do not need to move away from this number (841) on the basis of the newly available evidence published by ONS – particularly given concerns about the impact of student growth in the 2014 based SNPP and also longer terms trends not reflecting the most recent trends.

Employment Land Need

2.3.60 The economic scenarios originally considered at the Publication Draft Local Plan (2014) stage continued to be considered. Updated evidence was taken to Members who continued to endorse Scenario 2 as it reflected the economic policy priorities of the Council to drive up the skills of the workforce and encourage growth in businesses which use higher skilled staff.

Site Allocations

2.3.61 The Preferred Sites Consultation document sought to provide sufficient land to accommodate York’s Development needs across the plan period 2012-2032 based upon the updated housing and employment evidence base. In addition, the document provided further development land to 2037 (including allowing for some flexibility in delivery) and established a proposed Green Belt boundary ending 20 years.

2.3.62 The site allocations identified at the Publication Draft Local Plan (2014) stage were used as the starting point for considering preferred site allocations to meet identified need. The previous site allocations were assessed against updated evidence base which had moved on since 2014. This included updates to access to services, sustainable transport, highway capacity and the ability to create robust green belt boundaries. All sites were re-scored against the site selection methodology and additional technical officer comments were sought, where necessary. This led to the identification of:

- ▶ 13 Strategic Housing Sites;
- ▶ 23 General housing sites;
- ▶ 4 Strategic Employment sites;
- ▶ 1 Strategic Mixed use site (ST5: York Central);
- ▶ 7 General employment sites
- ▶ 1 Student housing site
- ▶ 1 Travelling Showpeople site.

2.3.63 The identification of sites reflected the NPPF requirement for the plan to be deliverable. This reflects that the sites chosen must have due regard to the viability and deliverability principles of NPPF paragraph 173, which requires careful attention is paid to viability and costs in plan-making. Willing landowners form a key part of this approach. In addition, the identified sites were tested for their viability against potential policy costs.

2.3.64 In addition, safeguarded land was no longer designated. Safeguarded land previously identified in the aborted Publication Draft Local Plan (2014) was removed given that several of the strategic site identified in the document anticipated build out times beyond the fifteen year plan period. This was to ensure that the long term need stretching beyond the plan period could be met and Green Belt boundaries would not need to be altered in the plan period.

Table 2.12 Summary of the SA of the 2016 Preferred Site Consultation

LOCAL PLAN PREFERRED SITES CONSULTATION	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
Sites	NPPF	Site selection process and methodology	The SA identified a variety of positive and negative impacts across a number of objectives.	Various representations were received relating to the sites identified for allocation and those not selected.

LOCAL PLAN PREFERRED SITES CONSULTATION	National and Regional Guidance	Evidence and policy approach	SA/SEA	3rd party representations
<p>Justification for Selection of Preferred Spatial and Growth Options</p> <p>The sites represented a continuance of the balanced approach to the identification of sites within the City of York area established in the Preferred Option (2013) and the halted Publication Draft (2014). Changes to the sites reflected the latest evidence and officer assessment.</p>				

Ministry of Defence (MOD) – Site Release (November 2016)

- 2.3.65 After the Preferred Sites Consultation concluded, the Ministry of Defence (MOD) announced as part of its Defence Estate Strategy on 7th November 2016 the release of three sites in York:
- ▶ Imphal Barracks, Fulford Road;
 - ▶ Queen Elizabeth Barracks, Strensall; and
 - ▶ Towthorpe Lines, Strensall.
- 2.3.66 Technical work was carried out to assess if the MOD sites represented ‘reasonable alternatives’ and if they would need to be considered as part of the Local Plan process. The sites were tested against the Local Plan Site Selection Methodology established at the Preferred Options Stage.
- 2.3.67 Imphal Barracks and Queen Elizabeth Barracks sites both passed criteria 1 to 4 as residential sites. The Towthorpe Lines site failed criteria 4 for residential sites but did pass the criteria assessment for consideration for employment use. Following the assessment against Site Selection Criteria 1 to 4 the sites were also considered by the technical officer group. This group included specialist officers covering areas such as ecology, archaeology, transport and landscape. Whilst they passed the Technical Officer Group this was subject to the outcomes of Habitat Regulation Assessment at the Strensall Sites and Transport Assessment along Fulford Road for Imphal Barracks.
- 2.3.68 The inclusion of the MOD sites, would allow an increase of 1,392 dwellings during the proposed Green Belt timeframe (20 years from adoption). It should be noted, however, that the Queen Elizabeth Barracks site would not be released until 2021 and Imphal Barracks until 2031. Towthorpe Lines has been identified as an employment allocation to help towards delivering the economic aspirations of the City.

Local Plan Pre-Publication Draft (Regulation 18 Consultation) (2017)

- 2.3.69 The Council undertook consultation on the Local Plan Pre-Publication Draft (Regulation 18 Consultation) between 18th September and 30th October 2017. The Pre-Publication Local Plan set out the Council’s preferred housing and employment growth figures, policies and site allocations alongside updated technical work underpinning housing and employment growth. This was accompanied by a SA Report which provided commentary on the performance of sites against the SA Objectives.
- 2.3.70 The Local Plan Pre-Publication Draft (Regulation 18 consultation) document drew on the previous stages of consultation and technical work undertaken to support the plan. It brought together latest evidence, including deliverability, and the inclusion of MOD sites as discussed above. It therefore included 21 strategic sites (with two MOD sites) as opposed to 19 in the Preferred Sites Consultation (2016), 27 local sites (21 housing, including 1 for C3b use, and six employment), 1 student housing site and 1 Travelling Showpeople site.

Housing Need

- 2.3.71 MHCLG published updated household projections – the 2014 based sub-national household projections in July 2016. GL Hearn produced a further report which updated the demographic starting point for York based on the July 2016 household projections (MHCLG).
- 2.3.72 This update increases the demographic starting point from 783 (which was the demographic starting point for the 841 housing need figure as per the 2016 SHMA) to 867 per annum. Part of this change was due to GL Hearn using a vacancy rate of 1.3% to convert households to the dwelling requirement based on Council Tax data for York instead of a vacancy rate of 3.8% taken from 2011 Census used in the 2016 report.
- 2.3.73 The GL Hearn report recommended that York should include a 10% market signals adjustment to the 867 figure. This would increase the housing figure to 953 per annum. The market adjustment is based on an assessment of both market signals and affordable housing need. GL Hearn has considered a single adjustment to address both of these issues as they are intrinsically linked.
- 2.3.74 Members of the Council's Executive at the meeting on 13th July 2017 resolved that on the basis of the housing analysis set out in paragraphs 82 - 92 of the Executive Report, the increased figure of 867 dwellings per annum, based on the latest revised sub national population and household projections published by the Office for National Statistics and the Department of Communities and Local Government, be accepted.
- 2.3.75 The Council's Executive also resolved that the recommendation prepared by GL Hearn in the draft Strategic Housing Market Assessment, to apply a further 10% to the above figure for market signals (to 953 dwellings per annum), was not accepted on the basis that Hearn's conclusions "were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations".

Employment Need

- 2.3.76 The Employment Land Review (ELR) (2016) published as part of the Preferred Sites Consultation used updated econometric projections by Oxford Economics (OE) dated May 2015 as the forecast for employment land demand over the Local Plan period. This data was sensitivity tested against data from up-to-date Regional Econometric Modelling (Dec 2016). The sensitivity testing was fundamentally about determining whether the land supply is sufficient to deliver all scenarios rather than establishing a new model for what will happen in the economy. This showed that there were slightly lower requirements from the REM model than the baseline forecasts. Consequently it was concluded that the original projections provided sufficient headroom for either growth scenario. Therefore, Scenario 2: re-profiled growth continues to be used with forming the basis of employment need with the requirement for 11,050 jobs between 2014 and 2032 (around 650 per annum). This equates to around 13,650 jobs per annum between 2017 and 2038, as expressed in the Local Plan Pre-Publication Draft.
- 2.3.77 Based upon the job requirements, the ELR set out that there is a need for 34.3ha of employment land between 2017-2038 having taken into account completions between 2012-2017.

Sustainability Appraisal

- 2.3.78 The SA of the Local Plan Pre-Publication Draft was undertaken jointly by the City of York Council and Amec Foster Wheeler)¹³. **Table 2.13** summarises the Local Plan Pre-Publication Draft stage policy approach, supporting evidence and an overview of comments made by the SA.

¹³ The Pre-Publication Plan SA Report can be accessed via:

http://www.york.gov.uk/download/downloads/id/14279/sustainability_appraisal_2017.pdf

The SA Report appendices can be accessed via: https://www.york.gov.uk/downloads/download/4036/pre-publication_draft_local_plan_reg_18_consultation

Table 2.13 Summary of the SA of the 2017 Local Plan Pre-Publication Draft

Local Plan Pre-Publication Draft	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
Spatial Strategy	NPPF	<p>A comprehensive spatial strategy was set out, covering the drivers of growth and factors that shape growth in the city, alongside the scale of growth and the key areas of change and opportunity that would support the delivery of the strategy (including policies on the city centre, York Central, Castle Gateway and strategic sites).</p> <p>The Spatial Strategy involved bringing forward the preferred option as appraised in 2013 SA Report. The strategy was selected ahead of the less sustainable options also appraised.</p> <p>Draft policies were also provided for each of the strategic sites within 24 Spatial Strategy policies.</p> <p>The previous site allocations were assessed against updated evidence base. The selection of sites reflected further technical assessment and evidence gathering following consultation at Preferred Sites Consultation (2016) stage and intention to release DIO sites.</p>	<p>Overall, the policies in the spatial strategy were appraised as having a significant positive effect on those SA objectives relating to housing (SA Objective 1), health (2), economy (4) and equality and accessibility (5).</p> <p>Minor positive effects were expected against education, climate change (7), biodiversity (8), water, waste, cultural heritage (14) and landscape (15).</p> <p>The sites proposed in the Pre-Publication Draft were appraised against the SA Objectives in light of the updated evidence base. The sites were considered to result in a number of positive and negative effects across the range of SA Objectives.</p>	A number of comments were received related to the policies within the spatial strategy section of the Local Plan Publication Draft and the sites chosen for inclusion in the plan.
Scale of Housing Growth	NPPF; NPPG	<p>The housing figure presented as the preferred option used the MHCLG baseline evidence household projections based on ONS data (867 dpa). This was chosen instead of the figure of 953dpa identified by GL Hearn which included a 10% uplift for market signals.</p> <p>The Plan identified additional supply to help meet the identified shortfall in the period 2012-2017 (56dpa) equating to 923 dpa.</p>	<p>The SA appraised the preferred option (867 dpa) and the reasonable alternative (953 dpa) based on the technical work undertaken by GL Hearn which saw an uplift in the baseline projections to account for market signals.</p> <p>The preferred option was appraised as having positive effects on housing (SA Objective 1) in the short and medium term but minor negative effects in the long term; and minor positive effects on education (3), economy (4) and access to services (5). Minor negative effects were assessed against health (2), climate change (7), biodiversity (8), land resources (9), water (10), waste (11), air quality (12), flood risk (13), historic environment (14) and landscape (15). Although uncertainties were identified for many of these.</p> <p>The SHMA 2017 Update reasonable alternative was considered to be marginally more sustainable due to the significant positive effects for housing (SA Objective 1), economy (SA Objective 4) and access to services (SA Objective</p>	<p>A number of responses were received related to the preferred growth figure.</p> <p>Although a number of respondents supported the growth figure, many others objected on the grounds that chosen housing figure did not reflect technical work, was not considered 'positive' planning as required by the NPPF, and would exacerbate affordability issues. Some objectors felt that the number was too high and would lead to environmental issues.</p>

Local Plan Pre-Publication Draft	National and Regional Guidance	Evidence and policy approach	SA/SEA	3 rd party representations
			5) in the long term and similar effects for other SA Objectives.	
Scale of Employment Growth	NPPF	<p>The preferred option focussed employment growth in line with scenario 2: re-profiled growth.</p> <p>This reflected the employment projections prepared by Oxford Economics which had been subject to sensitivity testing. This equated to around 13,650 jobs per annum between 2017 and 2038.</p>	<p>Polices SS1 (setting the overall employment growth requirement) and EC1 (which set out the specific allocations) were appraised as having significant positive effects on the economy (SA Objective 4).</p> <p>The preferred option for employment growth was appraised as 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 economic growth (4) which was considered most complementary to the economic priorities of the Council.</p> <p>Policy EC1: made provision for a range of employment development during the plan period including the identification of around 140,000m2 of employment floorspace to meet the forecast demand.</p>	<p>Comments were received that generally supported the employment growth figure and considered that the identified sites will support economic activity in the city.</p> <p>However, others commented that the land allocated was insufficient and did not provide the appropriate flexibility and choice required to meet the economic demands over the plan period.</p>

Justification for Selection of Preferred Spatial and Growth Options

The Local Plan Pre-Publication Draft Spatial Strategy took forward the option supported as the most sustainable through appraisal of all reasonable alternatives at the Preferred Options (2013) stage. This continued to use the Spatial Shapers as outlined through the Core Strategy process. The Pre-Publication Draft included 24 spatial strategy policies setting out the overall approach to development in the City of York and protection of the Green Belt. The spatial strategy also included specific policies to guide development at all of the strategic sites in the plan.

The Pre-Publication Draft included the baseline household projection as the preferred option – the alternative was rejected on the basis that the City of York’s Executive considered that SHMA 2017 Update’s conclusions “were speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations”. The employment growth figure was chosen as it represented the most appropriate option to meet the economic vision for the City of York, whilst also being the most sustainable overall.

The package of sites identified within the Local Plan Pre-Publication Draft represented the sites which were considered to comprise the most suitable, available and deliverable when assessed against the Local Plan Vision and the requirements of NPPF. This included a broad range of strategic housing and employment sites, including a new settlement (ST15), and range of general housing and employment allocations. The Pre-Publication Plan took forward the majority of site included in the previous consultation stages whilst also including sites being released by the MOD: Imphal Barracks, Fulford Road (ST36); Queen Elizabeth Barracks, Strensall (ST35); and Towthorpe Lines, Strensall (E18) following technical assessment.

Local Plan Publication Draft (Regulation 19 Consultation) (2018)

Housing requirement

2.3.79 The Local Plan Publication Draft takes forward the housing requirement set out in the Local Plan Pre-Publication Draft (Regulation 18 Consultation). The figure of 867 dwellings per annum (dpa) reflects the baseline MHCLG projections as discussed above in relation to the Pre-Publication Plan Draft. The City of York Executive meeting confirmed the housing requirement for inclusion in the Publication Plan at a meeting on 25th January 2018.

Employment growth

- 2.3.80 The Publication Plan takes forward the employment growth identified for inclusion in the Pre-Publication Plan (Scenario 2: re-profiled growth). This was consulted on previously and was appraised as the most sustainable option to meet the economic needs of the City of York at Pre-Publication Draft stage. This equates to an annual figure of 650 jobs per annum as reflected in Policy SS1.

Spatial Strategy

- 2.3.81 The spatial strategy presented in the Local Plan Publication Draft is unchanged from that presented at the Pre-Publication Draft stage. Following consideration at Local Plans Working Group and Executive, the Council decided to make changes to York Central (ST5), increasing the number of dwellings from 1,500 to 1,700-2,500 and employment floorspace (61,000m² to 100,000m²) with 1,700 dwellings in the housing trajectory. For Queen Elizabeth Barracks, Strensall (ST35) there is a reduction in the number of houses allocated from 578 to 500. No other changes to the sites that comprise the spatial strategy have been made since the Pre-Publication Plan. The Publication Plan therefore includes (as consulted on in the Pre-Publication Plan):
- ▶ 21 strategic sites with the inclusion of the two MOD sites Queen Elizabeth Barracks, Strensall (ST35) and Imphal Barracks, Fulford Road (ST36);
 - ▶ 23 General Housing sites (including 1 for C3b use);
 - ▶ 7 General employment sites;
 - ▶ 1 Student Housing site; and
 - ▶ 1 Travelling Showpeople Site.

3. Review of Plans and Programmes

3.1 Introduction

- 3.1.1 One of the first steps in undertaking SA is to identify and review other relevant plans and programmes that could influence the City of York Local Plan. The requirement to undertake a plan and programme review and identify the environmental and wider sustainability objectives relevant to the plan being assessed is set out in the SEA Directive. An 'Environmental Report' required under the SEA Directive should include:

“An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes” to determine “the environmental protection objectives, established at international (European) community or national level, which are relevant to the plan or programme...and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex 1 (a), (e)).

- 3.1.2 For the purposes of SA, the SA Report should also meet the requirements of the Environmental Report required under the SEA Directive.
- 3.1.3 Plans and programmes relevant to the Local Plan may be those at an international/ European, UK, national, regional, sub-regional or local level, as relevant to the scope of the document. The review of relevant plans and programmes aims to identify the relationships between the Local Plan and these other documents i.e. how the Local Plan could be affected by the other plans' and programmes' aims, objectives and/or targets, or how it could contribute to the achievement of their sustainability objectives. The review also ensures that the relevant environmental protection and sustainability objectives are integrated into the SA. Additionally, reviewing plans and programmes can provide appropriate information on the baseline for the plan area and help identify the key sustainability issues.
- 3.1.4 The SA Scoping Report (May 2013) included a review of plans and programmes, consistent with the requirements of the SEA Directive, and which informed the development of the SA Framework. This review was updated for the SA Report which accompanied the Local Plan Publication Draft presented to Local Plans Working Group and Executive Members in September 2014 and for the 2017 Pre-Publication Draft, to take into account recently published plans and programmes and consultation responses. This has been further updated at the current Local Plan Publication Draft stage to reflect the latest plans and programmes relevant to the preparation of the York Local Plan.

3.2 Review of Plans and Programmes

- 3.2.1 Over 100 international, national, regional/sub-regional and local level plans and programmes have been reviewed in preparing this SA Report. These are listed in **Table 3.1**, with the results of the review provided in **Appendix C**.

Table 3.1 Plans and Programmes Reviewed for the SA of the York Local Plan

International/European Context
<ul style="list-style-type: none"> • United Nations (UN) (2016) The Paris Agreement • The World Summit on Sustainable Development (WSSD)(2002) Commitments arising from Johannesburg Summit • UN (1997) Kyoto Climate Change Protocol • UN (1946) Convention on Human Rights • UN (2011) The Cancun Agreement • European Union (EU) (1997) European Spatial Development Perspective (97/150/EC) • EU (2011) A Resource- Efficient Europe- Flagship Initiative Under the Europe 2020 Strategy, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions (COM 2011/21) • EU (1992) Directive on the Conservation of Natural Habitats of Wild Fauna and Flora (92/43/EEC)

- EU (2009) European Directive on the Conservation of Wild Birds (09/147/EC) (codified version of Council Directive 79/409/EEC as amended)
- EU (1991) European Directive on Nitrates (91/676/EEC)
- EU (2000) European Directive Water Framework (2000/60/EC)
- EU (2007) Floods Directive (2007/60/EC)
- EU (2008) European Directive Waste Framework (Directive 75/442/EEC, 2006/12/EC 2008/98/EC as amended)
- EU (2001) European Directive EIA (97/11/E)
- EU (2001) European SEA Directive (2001/42/EC)
- World Commission on Environment and Development (1987) Our Common Future (The Brundtland Report)
- EU (2001) European Directive Energy Performance of Buildings (2001/91/EC)
- EU (2006) Employment Strategy
- EU (2002) Environmental Noise Directive (2002/49/EC)
- EU (2008) Air Quality Framework Directive (2008/50/EC) and previous directives (96/62/EC; 99/30/EC & 2002/3/EC)
- EU (1999) Directive Limit Values for SO₂, NO_x, PM₁₀ and Lead (1999/30/EC)
- United Nations Environment (2003) Pan-European Biological and Landscape Diversity Strategy
- The UN Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (1998) Aarhus Convention
- EU (2006) European Sustainable Development Strategy (ESDS)
- EU (1999) Landfill Directive 99/31/EC
- United Nations (2000) United Nations Millennium Declaration
- Ramsar Convention on Wetlands of International Importance, especially waterfowl habitat (1971)
- EU (2009) Renewable Energies Directive April (2009/28/EC)
- EU (2010) the Industrial Emissions Directive (2010/75/EU)
- EU (2011) EU Biodiversity Strategy to 2020-towards implementation
- EU (2000) Florence European Landscape Convention 2000 (became binding March 2007)
- EU (1995) Valetta European Convention on the Protection of the Archaeological Heritage (Revised)
- EU (2014) 2030 Framework for Climate and Energy Policies
- EU (2015) 'Closing the loop - An EU Action Plan for the Circular Economy' policy package
- EU (2016) EU Seventh Environmental Action Plan (covers up to 2020)

National Context

- Department for Communities and Local Government (CLG) (2009) White Paper: The UK Low Carbon Transition Plan: National Strategy for Climate and Energy
- DCLG (2012) National Planning Policy Framework
- DCLG (2014) Planning Practice Guidance
- DCLG (2014) National Planning Policy for Waste
- DCLG (2015) Planning Policy for Traveller Sites
- DCLG (2017) Fixing our broken housing market
- Department for Culture Media and Sport (2004) Culture at the heart of regeneration
- DCMS (2007) White Paper: Heritage Protection for the 21st Century
- Department of Energy and Climate Change (DECC) (2009) The UK Renewable Energy Strategy
- DECC (2011) Carbon Plan: Delivering our Low Carbon Future
- DECC (2014) Community Energy Strategy
- Department for the Environment, Food and Rural Affairs (DEFRA) (2002) Directing the Flow: Priorities for Future Water Policy
- DEFRA (2002) Working with the Grain of Nature: Biodiversity Strategy for England
- DEFRA (2007) Strategy for England's Trees, Woods and Forests
- DEFRA (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland
- DEFRA (2007) Waste Strategy for England and Wales
- DEFRA (2008) Adapting to Climate Change in England and the Adapting to climate change Programme
- DEFRA (2009) Appraisal of flood and coastal erosion risk management
- DEFRA (2009) Safeguarding Our Soils: A Strategy for England
- DEFRA (2010) Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network
- DEFRA (2010) Low Emissions Strategies: Using the planning system to reduce transport emissions, Good Practice Guidance
- DEFRA (2011) Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services
- DEFRA (2011) Natural Environment White Paper: The Natural Choice- Securing the Value of Nature
- DEFRA (2012) UK post 2010 Biodiversity Framework
- DEFRA (2013) The National Adaptation Programme – Making the Country Resilient to a Changing Climate
- DEFRA (2013) Waste Management Plan for England
- DEFRA (2017) Climate Change Risk Assessment 2
- Department of the Environment, Transport and the Regions (2000) Rural White Paper: Our Countryside – The Future
- Department of Health (2003) Tackling health inequalities: A programme for action (2003)
- Department of Transport (2009) Low Carbon Transport: A Greener Future
- Environment Agency (2006) Groundwater Protection: Policy and Practice (GP3)
- Environment Agency (2008) Wetlands Policy
- Environment Agency (2011) National Flood and Coastal Erosion Risk Management Strategy for England

- HM Government (1979) Ancient Monuments and Archaeological Areas Act
- HM Government (1981) Wildlife and Countryside Act
- HM Government (1990/1995) Environmental Protection Act 1990 / Environment Act 1990 and 1995
- HM Government (1990) Planning (Listed Buildings and Conservation Areas) Act
- HM Government (2000) Countryside and Rights of Way Act
- HM Government (2004) Housing Act (and revised 2006)
- HM Government (2005) Clean Neighbourhoods and Environment Act
- HM Government (2005) UK Sustainable Development Strategy “Securing the Future”
- HM Government (2006) The Natural Environment and Rural Communities (NERC) Act
- HM Government (2008) Climate Change Act
- HM Government (2008) Local Transport Act
- HM Government (2009) World Class Places: The Government’s Strategy for Improving Quality of Places
- HM Government (2010) The Conservation of Habitats and Species Regulations (updated 2017)
- HM Government (2010) The Government’s Statement on the historic environment for England
- HM Government (2010) Water and Flood Management Act
- HM Government (2011) Localism Act
- HM Government (2013) The Community Infrastructure Levy (Amendment) Regulations
- HM Government (2013) Achieving Strong and Sustainable Economic Growth
- HM Government (2013) Energy Act
- HM Government (2014) The Water Act
- HM Government (2015) Fixing the foundations: creating a more prosperous nation
- HM Government (2015) Deregulation Act
- HM Government (2016) Housing and Planning Act
- HM Government (2017) Industrial Strategy: Building a Britain Fit for the Future
- HM Government (2017) Air quality plan for nitrogen dioxide (NO₂) in UK (Draft)
- Historic England (2015) Historic Environment Good Practice Advice in Planning Note 1

Regional/Sub Regional

- Countryside Agency (1999) Countryside Character Volume 3: Yorkshire and the Humber
- Environment Agency (2010) Ouse Catchment Flood Management Plan
- Environment Agency (2015) Water for life and livelihoods: Humber river basin district river basin district basin management plan (Updated)
- Forestry Commission (2005) Regional Forestry Framework: The Value of Trees in our Changing Region
- HM Government (2016) The Northern Powerhouse: One Agenda, One Economy, One North
- HM Government (2016) Northern Powerhouse Strategy
- Leeds City Region Enterprise Partnership (2016) Strategic Economic Plan 2016-36
- Leeds City Region Partnership (2010) Leeds City Region Green Infrastructure Strategy
- North Yorkshire Strategic Housing Partnership (2011) North Yorkshire Local Investment Plan 2011-2021
- North Yorkshire County Council (2007) North Yorkshire Minerals Local Plan Saved Policies
- North Yorkshire County Council (2007) Rights of Way Improvement Plan for North Yorkshire
- North Yorkshire County Council (2009) North Yorkshire Waste Local Plan Saved Policies
- Transport for the North (2018) Strategic Transport Plan: Draft for Public Consultation
- York, North Yorkshire and East Riding Local Enterprise Partnership (2014) York, North Yorkshire and East Riding Strategic Economic Plan
- York and North Yorkshire Cultural Partnership (2009) 2009-2014 Culture Strategy
- Yorkshire and Humber Assembly (2006) Yorkshire and Humber Rural Strategy
- Yorkshire and Humber Biodiversity Forum (2009) Regional Biodiversity Strategy for Yorkshire and Humber
- Yorkshire and Humber Climate Change Partnership (2009) Climate Change Plan for Yorkshire and Humber 2009-2014: Your Climate, Our Future (
- Yorkshire and Humber Environment Forum (2010) Economic Impact of Heritage in Yorkshire and Humber
- Yorkshire and Humber Historic Environment Forum (2009) Historic environment Strategy for Yorkshire and the Humber Region
- Yorkshire Water (2014) Water Resources Management Plan

Local Plans and Programmes (City of York Council unless otherwise stated)

- A City Partnership To Prevent Homelessness 2013-2018
- Achieving Excellence: York’s 14-19 Plan 2009-2015
- Biodiversity Audit and Action Plan (2010)
- City of York Council’s Air Quality Action Plan 3 (2015) (AQAP3)
- City of York Employment Land Review (2016)
- City of York Council and the University of York (ongoing) Science City York Strategy
- City of York Local Flood Risk Management Strategy (2015)
- Climate Change Strategy and Action Plan for York 2010-15
- Contaminated Land Strategy (2001, revised 2016)
- Council Plan 2015-2019

- Environment Agency (2004 and updated 2008) The Swale, Ure, Nidd and Upper Ouse Catchment Abstraction Management Strategy (CAMS)
- Environment Agency (2013) Swale, Ure, Nidd and Upper Ouse abstraction licensing strategy
- Greenbelt Appraisal (2003 and Technical paper 2011)
- Gypsy, Roma, Traveller and Travelling Showpeople Accommodation Assessment (2014) (update 2017)
- Heritage Topic Papers
- Houses in Multiple Occupation Technical Paper and HMO Supplementary Planning Guidance (2012)
- Housing Strategy 2011-15
- Joint Health and Wellbeing Strategy 2013-16 (and emerging for 2017-2022)
- Let's Talk Rubbish: A Municipal Waste Management Strategy for City of York and North Yorkshire 2006-2026 (2006)
- Local Agenda 21 Strategy (2000)
- Local Plan Evidence: Open Space and Green Infrastructure (2014) (Prepared by Amec for City of York Council) (update 2017)
- Local Transport Plan 3 2011-2031
- Low Emission Strategy (2012)
- One Planet York - Prospectus 2017
- Older Persons Housing Strategy 2011-2015
- Renewable Energy Strategic Viability Study (AEA, 2010)
- Renewable Energy Study (2014)
- Safer York Partnership (2014) Community Safety Plan 2014-2017
- Strategic Flood Risk Assessment (2011/2013)
- Taking Play Forward – A Play Strategy for York (2002 and 2010)
- Vale of York Clinical Commissioning Group (2014) Integrated Operational Plan 2014-2019
- Visit York Strategic Plan 2009-2012
- York Central Transport Study (2005)
- York City Vision and Community Strategy (Without Walls) 2011-2025 (2011)
- York Climate Change Impacts Profile (2010)
- York Economic Strategy 2016-2020: Choosing a Better Story (2016)
- York's Landscape Appraisal (1996)
- York Supported Housing Strategy 2014-2019
- York Strategic Housing Market Assessment (Prepared by GL Hearn for City of York Council (2016) and update (2017))
- YorOk Childrens' Trust (2016) York's Children and Young People's Plan 2016-2020

Neighbouring Plans and Programmes

- East Riding Local Plan (2016)
- Hambleton District Council Core Strategy (2007)
- Harrogate District Core Strategy (2009)
- Ryedale District Council Local Plan Strategy (2013)
- Selby District Council Core Strategy Local Plan (2013)

3.3 Key Messages

3.3.1 The review of plans and programmes presented in **Appendix C** has identified a number of objectives and policy messages relevant to the Local Plan and scope of the SA across the following thematic areas (developed to include the topics required by the SEA Directive):

- ▶ Population and Households;
- ▶ Economy;
- ▶ Deprivation and Equality;
- ▶ Community Safety;
- ▶ Transport;
- ▶ Health;
- ▶ Air Quality;
- ▶ Water, Flooding and Flood Risk;
- ▶ Green Infrastructure and Biodiversity;
- ▶ Landscape and Heritage

3.3.2 These messages are summarised in **Table 3.2** together with the implications for the SA Framework.

Table 3.2 Key Messages Arising from the Review of Plans and Programmes

SEA Topic	SA Theme	Key Messages/objective from the Plans and Programmes
Population	Population and Households, Economy, Deprivation and Equality, Community Safety	<p>Population and households</p> <ul style="list-style-type: none"> • Enable housing growth and deliver a mix of high quality housing to meet local needs; • Meet the accommodation needs of Gypsy, Traveller and Travelling Showpeople; • Provide the sites required to allow growth of the City to accommodate housing needs into the future. <p>Deprivation and Equality</p> <ul style="list-style-type: none"> • Create mixed and vibrant communities; • Promote social inclusion; • Support expansion of educational facilities; • Provide high quality services, community facilities and social infrastructure that are accessible to all; • Encourage new development alongside infrastructure provision. <p>Community Safety</p> <ul style="list-style-type: none"> • Reduce crime and the fear of crime; • Reduce anti-social behaviour. <p>Economy</p> <ul style="list-style-type: none"> • Maintain economic growth to secure the long-term future of the City and jobs; • Ensure that there is an adequate supply of employment land to meet local needs and to attract inward investment; • Develop York's key influences in the region; • Continue Science City York; • Promote the vitality of town centres and local shopping centres and support retail and leisure sectors; • Maintain and improve educational attainment and ensure the appropriate supply of high quality educational facilities; • Support the development of skills in the workforce to reduce unemployment and deprivation; • Strengthen the visitor economy; • Encourage rural diversification and support rural economic growth; • Create local employment opportunities.
Human Health	Health, Air Quality, Water, Flooding and Flood Risk	<ul style="list-style-type: none"> • Promote improvements to health and well-being. • Promote healthier lifestyles. • Minimise noise pollution. • Reduce crime and the fear of crime. • Reduce anti-social behaviour. • Ensure that there are appropriate facilities for the disabled and elderly.
Biodiversity, Fauna, Flora	Green Infrastructure and Biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks. • Deliver safe and secure networks of green infrastructure and open space. • Identify opportunities for open space provision and enhancement. • Protect and enhance habitats and conservation areas in York with no detrimental impact on biodiversity;
Soil	Geology and Soils	<ul style="list-style-type: none"> • Reduce land contamination; • Contribute to the remediation of contaminated land; • Protect soil quality and minimise the loss of Best and Most Versatile agricultural land.
Water	Water, Flooding and Flood Risk, Resources, Energy and Waste	<ul style="list-style-type: none"> • Protect and enhance surface and groundwater quality; • Improve water efficiency; • Avoid development in areas of flood risk; • Protect floodplains from development; • Reduce the risk of flooding arising from new development; • Ensure timely investment in water management infrastructure to accommodate new development;

SEA Topic	SA Theme	Key Messages/objective from the Plans and Programmes
		<ul style="list-style-type: none"> Promote the use of Sustainable Urban Drainage Systems.
Air	Air Quality, Climate Change, Transport	<ul style="list-style-type: none"> Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum.
Climatic Factors	Climate Change, Air Quality, Water, Flooding and Flood Risk, Resources, Energy and Waste, Transport	<p>Climate Change</p> <ul style="list-style-type: none"> Contribute towards renewable energy targets; Minimise the effects of climate change; Reduce emissions of greenhouse gases that may cause climate change; Encourage the provision of renewable energy; Move towards a low carbon economy; Promote adaption to the effects of climate change; Encourage high standards of energy efficiency. <p>Transport</p> <ul style="list-style-type: none"> York should be a model sustainable city with a quality built and natural environment and a modern integrated transport network; Improve connectivity to the region; Ensure access to local services and local transport provision; Reduce the reliance on car based transport.
Material Assets	Resources, Energy and Waste	<ul style="list-style-type: none"> Implement the waste hierarchy by reducing landfill and encouraging reducing, recycling and reusing materials; Encourage the use of previously developed (brownfield) land; Promote the re-use of derelict land and buildings.
Cultural Heritage including architectural and archaeological	Landscape and Heritage	<ul style="list-style-type: none"> Support York's historic environment; recognised to be of national significance; Create and maintain local character and distinctiveness; Conserve and enhance cultural heritage assets and their settings; Maintain and enhance access to cultural heritage assets; Respect, maintain and strengthen local character and distinctiveness; Improve the quality of the built environment; Consider the historic baseline and protection and enhancement of the historic environment to increase its contribution into the future; Respect and preserve sites of archaeological interest and their setting.
Landscape	Landscape and Heritage	<ul style="list-style-type: none"> Protection and maintenance of the Green Belt. The Local Plan should focus on setting a suitable Green Belt boundary for York;

4. Baseline Analysis

4.1 Introduction

- 4.1.1 An essential part of the SA process is the identification of the current baseline conditions and their likely evolution. It is only with a knowledge of existing conditions, and a consideration of their significance, that the issues which the Local Plan should address can be identified and its subsequent success or otherwise be monitored.
- 4.1.2 The SEA Directive requires that the evolution of the baseline conditions of the plan area (that would take place without the plan or programme) is identified. This is useful in informing assessments of significance, particularly with regard to the effect that conditions may already be improving or worsening and the rate of such change. Where information on these trends is available it has been identified.
- 4.1.3 The SA Scoping Report (May 2013) included an analysis of baseline conditions and trends. This was updated for the SA Report which accompanied the Publication Draft Local Plan presented to LPWG and Executive Members in September 2014 and for the SA Report which accompanied the Local Plan Pre-Publication Draft (2017). To ensure that this analysis is based on the most up-to-date information available, it has been reviewed as part of the preparation of this SA Report.

4.2 Population and Community

Population

- 4.2.1 As at the 2011 Census, the City of York had a population of 198,051. This represented an increase of 9.4% since the 2001 Census when the population was recorded as 181,094. The latest population projections show York's population to be 208,400 in 2016 (Office of National Statistics (ONS) population estimates). The latest projections anticipate that York's population will grow to 238,000 by 2039 a 12.5% increase between 2014 and 2039 (ONS, 2014-based subnational population projections). Overall, in the 2012-32 period, using the 2014-based subnational population projections, the York Strategic Housing Market Assessment (SHMA) (2016 and addendum) ¹⁴ identifies an increase in population of around 31,400 people (an increase of around 15.7%) in York. 51.4% of the population is female and 48.6% male.
- 4.2.2 The proportion of people aged 65 and over has increased between 2001 and 2011. This trend is predicted to continue with the cohort expected to increase the most for people aged 80-84 and 85 plus, in line with increasing life expectancy. There have also been significant increases in the proportion of 15-19 years olds (17.8%) and 20-24 year olds (39.1%), which reflects the two successful universities located within the City. The population pyramid represents this with a large population in the 20-24 year old cohort.
- 4.2.3 Using the ONS category descriptions, the White British population accounts for 90.2% of York's population with the Black and Minority Ethnic (BME) population, which includes white Irish, white other and gypsy groups, accounting for 9.8%. Overall, this data indicates that there has been an increase in BME communities in York since 2001.

Households

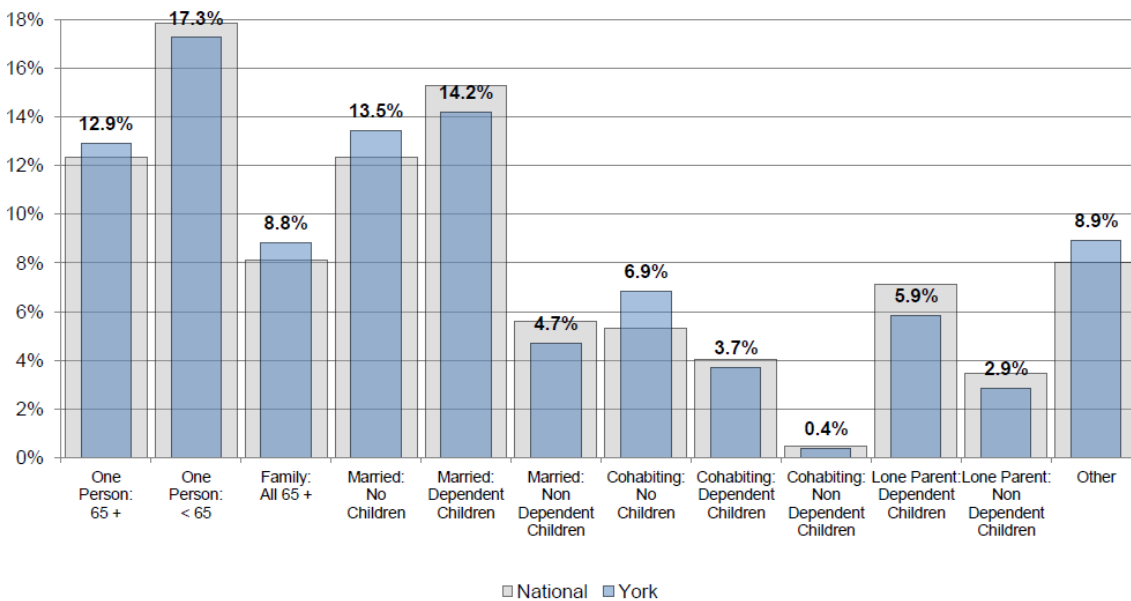
- 4.2.4 The 2011 Census revealed York to have 83,552 households. This constituted an 8.6% increase from 2001. Using ONS 2014-based subnational household projections there were estimated to be 84,271 households in 2012. This is projected to grow to 101,389 in 2032 and to 104,867 in 2037.

¹⁴ City of York Council (2016 and update) York Strategic Housing Market Assessment prepared by GL Hearn. Available via: <http://democracy.york.gov.uk/documents/s106785/Annex%20C%20Strategic%20Housing%20Market%20Assessment%20and%20Addendum.pdf>

This is a predicted change of 17,118 households between 2012 and 2032. The York SHMA update (2017) sets out a demographic baseline for assessing housing need of 867 dwellings per annum equivalent to 17,340 new dwellings over a 20 year plan period (with a vacancy rate of the conversion of households to dwellings of 1.3%). Based on an adjustment to reflect market signals, the SHMA identifies a need for 953 dwellings per annum.

4.2.5 The average household size remains the same as it did in 2001 with 2.3 persons per household. However, York’s household composition is set to change with an increase in single person households, of which half are anticipated to be aged over 65. York has a high number of cohabiting couples and a high proportion of couples with no children (6.9%), which is the highest in the region. 24% of all households contain one child which is lower than the national average at 27%. York has a lower level of lone parent families with dependent children (5.9%) compared to the region (7.1%).

Figure 4.1 Household Composition



Source: City of York Council (2017) York Profile using 2011 Census data

4.2.1 The data shows that there is a significant trend for cohabitating couples in the future. The number of cohabiting couples is set to increase by 125% between 2004 and 2031 compared to a 9% increase in married couples. There is also a growing trend for multiple person households, which is also set to increase by 65% and set to be the largest household type from 2026. This growth reflects changing lifestyle trends, such as homes of multiple occupation inhabited by young professionals as well as communal establishments.

Housing Development

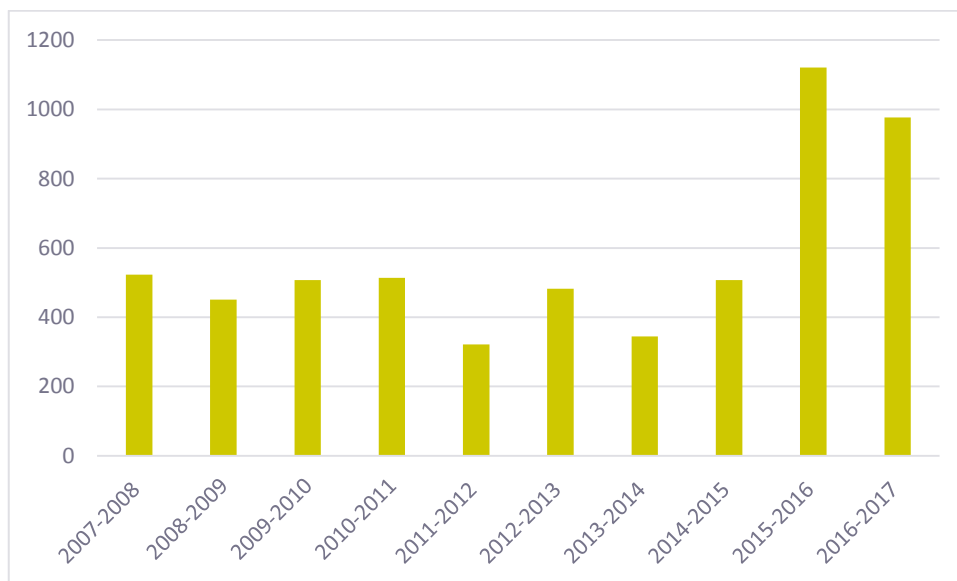
4.2.2 The Authority’s Monitoring Report (AMR)¹⁵ shows that between the start of the plan period in April 2012 and 31st March 2017 there were 3,432 net dwellings built, equivalent to 686 dwellings per annum. In 2016/17, there were 977 net new dwellings completed which is considerably higher than the five year average although lower than the level of completions in 2015/16 (1,121). The net completion figures for 2015/16 and 2016/17 are both significantly higher than the completions in 2012/13 (482 dwellings), 2013/14 (345 dwellings) and 2014/15 (507 dwellings) reflecting the upturn in the economy following the recession. The ongoing recovery is also reflected in the most recent

¹⁵ City of York Council Authority’s Monitoring Report and Housing Monitoring Reports. Available via: https://www.york.gov.uk/downloads/download/1274/annual_monitoring_reports [accessed July 2017]

half-year monitoring¹⁶ which identified that between 1st April and 30th September 2017 there were 1,036 net housing completions. The majority of these were off campus, privately managed student accommodation (637 completions).

- 4.2.3 The increase in the number of dwellings completed also reflects the relaxation of permitted development rights, with 252 net new homes in 2016/17 completed as a result of changes that allow conversion of some uses to dwellings. **Figure 4.2** shows the net housing completions over the last 10 years. In total 5,748 net new dwellings were developed over the period.
- 4.2.4 The number of consents at 31st March stood at 3,578. In the six months between 1st April and 30th September a further 928 net additional homes have been granted planning consent. The number of consents hit an all time low in 2011/2 but has recovered since the upturn in the wider economy.

Figure 4.2 Net Dwelling Gain (2007-2017)

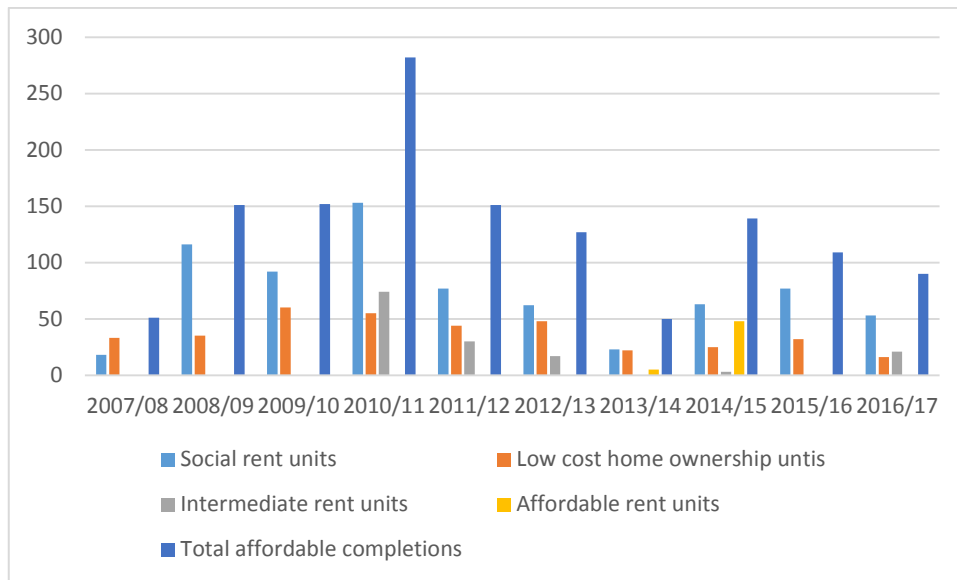


- 4.2.5 The breakdown of dwelling types has not been reported in 2013 or 2014 but the 2010/11 AMR showed that 59.7% of all completions were flats/apartments, 21.5% town houses/terraced properties, 6.5% semi-detached and 8.7% detached homes.
- 4.2.6 **Figure 4.3** shows the gross affordable housing completions by tenure. Completion of affordable units peaked in 2010/11 (282 completions) and aside from 2007/08 (51 completions) and 2013/14 (50 completions) they have remained fairly level across the period with around 100-150 a year. However, in 2016/17 only 90 affordable units were completed.¹⁷

¹⁶ City of York (2017) Housing Monitoring Update – October. Available: http://www.york.gov.uk/download/downloads/id/14634/housing_monitoring_update_-_october_2017.pdf [accessed February 2018]

¹⁷ City of York Council (2017) Affordable housing scheme gross completions. Available via: https://www.york.gov.uk/downloads/download/1435/affordable_housing_scheme_gross_completions [accessed February 2018]

Figure 4.3 Gross Affordable Housing Completions (2007-2017)



Likely Evolution without the Plan

- 4.2.7 The population and households in York will continue to grow but understanding to what extent will be determined by levels of natural change and migration. In 2016, the City’s population was estimated to be 208,400 and current trends will see this increase by around 12.5% to 238,000 by 2039. It is anticipated that the number of people aged 18-24 will increase in line with York’s student population at the higher educational establishments in York. Similarly, the projections indicate that the number of older people is increasing, which will put different pressures on service provision and housing needs.
- 4.2.8 Without policy intervention, and given that the population projections are trend based, it is not unreasonable to assume that an increase of population will occur. There may also be a change in housing need through changing household structures as evidence suggests single person households, higher occupancy/ multiple person households and older persons accommodation is growing. The SHMA recognises that there is a need for 1 and 2 bed affordable properties whilst for market housing 2 and 3 bed makes up the majority of the size needed.
- 4.2.9 Should no policy be in place, the market would determine the type and location of housing development. Where suitable housing is less likely to be available locally, it may drive some people to seek housing further away from the City, which is less sustainable than meeting housing need within the authority area given the social, economic and environmental implications from trip generation. Furthermore, given the financial pressures, householders are likely to become in more need of affordable housing options, which may not be delivered without policy intervention. This could make sectors of the population vulnerable or exposed to limited accommodation choices. Evidence in the SHMA already considers that the under delivery may suggest a backlog of housing need, which should be factored into market signals analysis, and this situation may become exacerbated should a policy on housing growth and affordable housing delivery not be implemented.
- 4.2.10 The quality of homes provided across York in the future will largely be dependent upon national guidance and Building Regulations requirements. Any changes to the guidance should be reflected in planning policy that guides development and the provision of good quality homes in the future. The Building Regulations set out the criteria for the quality of housing to be provided.

Key Sustainability Issues

- ▶ York’s population and household numbers are projected to increase;

- ▶ York has a high need for housing (including affordable housing) which needs to be addressed;
- ▶ Housing delivery, which has increased significantly in the last two monitoring years, must be maintained;
- ▶ There is a need to plan for a mix and type of accommodation to suit all household types recognising the SHMA and local evidence of need.

4.3 Economy

Economy and Employment

- 4.3.1 The UK Government's Northern Powerhouse Strategy (2016) recognises the potential in northern England to deliver significant and lasting economic benefits by enhancing skills, supporting innovation and enterprise, and promoting trade and investment. The York Economic Strategy (2016-2020) sets out the priorities for economic growth in York which include developing the new Central Business District elements of York Central; retaining graduate talent; developing research and university led growth; and seeking investment in transport networks.
- 4.3.2 York has seen a number of structural changes to its economy over the past 20 years which has meant it has had to diversify from a predominantly manufacturing base. The City is now a hub for competitive industry and research expertise in biosciences, healthcare and medical research, biorenewables, environmental research, IT and digital and creative technologies. York has significant links to the Leeds City Region. The relationship between Leeds and York is recognised as complementary whilst York is identified as being economically independent to Leeds.
- 4.3.3 Recently, York was recognised as being one of the most resilient economies in the North and one of the fastest growing in the country (Eskogen, 2011¹⁸). The City now contributes £4bn of value to the national economy. Subsequent analysis shows that more than one in five private sector jobs in York are employed by a London headquartered business. To put this in context, fewer than one in 40 private sector jobs in York were accountable to businesses headquartered in near neighbour Leeds¹⁹.
- 4.3.4 Nomis statistics²⁰ show that 87.4% of businesses in York are micro enterprises (with 0-9 employees), which is very similar to the equivalent figure for the Yorkshire and the Humber region (88.2%). The number of large enterprises (250+ employees) amounts to 0.4% of all enterprises, which is the same as the equivalent figure for the region (0.4%).
- 4.3.5 The employee job by industry profile for 2016²¹ is similar to the region and Great Britain as a whole. Notably there is a lower percentage employed in manufacturing in York (3.9%) than regionally (10.3%) and nationally (8.1%). Conversely, there is a higher percentage of people employed in the 'service sectors' of human health and social work (15.7% compared to 14.5% regionally and 13.3% nationally), education (10.8% compared to 10.0% regionally and 8.9% nationally) and accommodation and food service activities (9.8% compared to 6.2% regionally and 7.5% nationally) (see **Figure 4.4**).

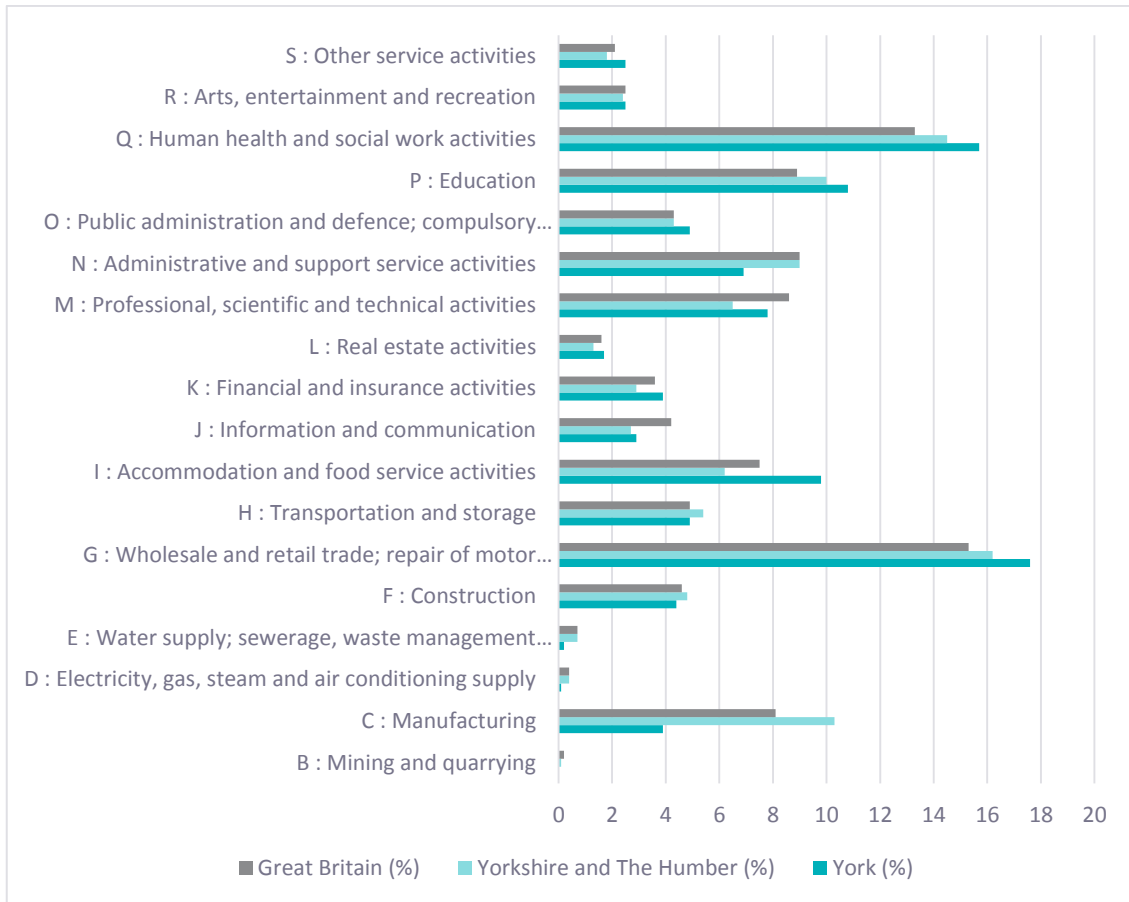
¹⁸ Eskogen, June 2011, Economic and Retail Growth Analysis and Visioning Work Economic Baseline Report (June 2013).

¹⁹ Centre for Cities report 2014. Cities Outlook 2014

²⁰ Office of National Statistics Nomis Web available via: <https://www.nomisweb.co.uk/reports/lmp/la/1946157112/report.aspx?#ls> [accessed July 2017]

²¹ Office of National Statistics Nomis Web available via: <https://www.nomisweb.co.uk/reports/lmp/la/1946157112/report.aspx?#ls> [accessed February 2018]

Figure 4.4 Employee jobs by industry (2016)



4.3.6 According to York’s Labour Market Profile²², the number of economically active people in York stood at 110,000 people in September 2017, equivalent to 78.2% of 16-64 years in the City area. This is higher than the percentage in the Yorkshire and Humber Region (76.8%) and slightly above that for the UK as a whole (78.1%).

4.3.7 York has a significantly higher than average number of people employed in occupations in the socio-economic classification (SOC) 2010 major groups 1-3 (50.2%) than the regional (40.6%) and national average (45.6%). Conversely the City has a much lower than average number of people employed in SOC 2010 Group 4-5 (19.6%) and (Group 8-9 (13.1%)), reflecting York’s declining manufacturing economic base in recent years. **Table 4.1** below shows the breakdown by Major Groups.

Table 4.1 Employment by Occupation

Occupation	York (%)	Yorkshire and the Humber (%)	Great Britain (%)
Soc 2010 Major Group 1-3 1. Managers and Senior Officials 2. Professional Occupations 3. Associate Professionals & Technical	50.2	40.6	45.6

²² Office of National Statistics Nomis Web available via: <https://www.nomisweb.co.uk/reports/lmp/la/1946157112/report.aspx?#ls> [accessed February 2018]

Occupation	York (%)	Yorkshire and the Humber (%)	Great Britain (%)
Soc 2010 Major Group 4-5 4. Administrative & Secretarial 5. Skilled Trades Occupations	19.6	22.1	20.7
Soc 2010 Major Group 6-7 6. Caring, Leisure and Other Service Occupations 7. Sales and Customer Service Occupations	17.1	17.7	16.7
Soc 2010 Major Group 8-9 8. Process Plant & Machine Operatives 9. Elementary Occupations	13.1	19.6	16.9

Source: Nomis Web

- 4.3.8 Average gross weekly pay for full-time workers residing in City in 2017 was £519.30. This was higher than the average for the Yorkshire and Humber region (£502.30) but slightly lower than for Great Britain as a whole (£552.70). At June 2017, 6.4% of the City's population were claiming out of work benefits. This is significantly below the regional (12.6%) and the national comparator (11.1%).²³
- 4.3.9 The supply of employment land has changed since 2012 with the development of 12,249m² of new floor space for employment uses over that period, equivalent to the development of 3.5 hectares of land (see **Table 3.2**). The Employment Land Review (2016)²⁴ sets out scenarios for future employment land growth in the City over the rest of the plan period.

Table 4.2 Change in employment land supply (over 400m² threshold) 2012-2016

Use Class	Gained	Lost	Net	
	Floorspace (m ²)	Floorspace (m ²)	Floorspace (m ²)	Land (Ha)
B1a	21,579	-16,790	4,788	1.1
B1b	868	0	868	0.1
B1c	420	-412	8	0.03
B2	2,200	-2,236	-36	0
B8	2,233	-4,068	-1,835	0
Sub total for B uses	27,300	23,506	3793	1.3
D2	10,718	-2,262	8,456	2.2
Total	38,018	-25,768	12,249	3.5

Source: City of York (2016) Employment Land Review

- 4.3.10 York is a popular tourist destination attracting 7 million visitors per year²⁵ with its unique heritage being the key attraction. The City is also seen as a gateway to the wider region. Correspondingly, the tourism industry employs a significant workforce, although this can be seasonal work. The York Economic Strategy (2016) aims to creatively develop York's tourism and culture offer and continue to raise the city's profile as a quality visitor destination.
- 4.3.11 The Retail Study Update²⁶ includes a health check of York concluded that there is a strong mix of retail provision and diversity in York city centre. The main deficiency in the city is noted as the lack

²³ Office of National Statistics Nomis Web available via: <https://www.nomisweb.co.uk/reports/lmp/la/1946157112/report.aspx#tabempocc> [accessed February 2018]

²⁴ City of York (2016) Employment Land Review. Available via: https://www.york.gov.uk/downloads/file/11247/employment_land_review_2016 [accessed July 2017]

²⁵ City of York Council.

²⁶ City of York (2014) Retail Study Update prepared by WYG. Available via: https://www.york.gov.uk/download/downloads/id/.../retail_study_update_2014pdf [accessed July 2017]

of a wide variety of large floorplate stores. The study notes that although the historic character of the city centre is one of York's key strengths, it presents a barrier to expansion of the retail offer and as a consequence development schemes are often relatively small scale and provide no significant increase in floorspace. The Study notes that footfall within the city centre fell by 3% in 2011/12. However, vacancy rates are below the national average.

Skills and Education

- 4.3.12 **Table 4.3** illustrates that compared with the Yorkshire and the Humber region and the national (Great Britain) average, levels of educational attainment in York are higher, and at some levels significantly so. For the period January to December 2016, the educational attainment of pupils within the City area at the end of Key Stage 4 (GCSE or Equivalent) achieving 5+ A* - C (NVQ 2 and above) was 80.2%, which is significantly higher than the regional average of 71.0% and the national average of 74.3%. York also has a much higher percentage of population achieving a HND, Degree and Higher Degree (NVQ Level 4 and above) at 42.7% than the regional average (31.3%) and this is slightly above the national average (38.2%).

Table 4.3 Level of Qualification Obtained

Level	York (%)	North West (%)	Great Britain (%)
NVQ 4 and above	42.7	31.3	38.2
NVQ 3 and above	65.3	52.3	56.9
NVQ 2 and above	80.2	71.0	74.3
NVQ 1 and above	90.7	83.4	85.3
Other qualifications	3.2	7.1	6.6
No qualifications	6.1	9.5	8.0

Source: Nomis (2017) Qualifications January 2016 – December 2016.

- 4.3.13 There are 63 publicly funded schools currently in operation in York, which include community and voluntary controlled schools that are maintained by the Local Authority, as well as academies that are often run together within a group of academies – called a Multi Academy Trust (MAT).²⁷
- 4.3.14 York is home to two higher and further education colleges and two universities: the University of York and the York St. John University.

Likely Evolution without the Plan

- 4.3.15 York has been recognised as one of the most resilient economies in the North of England and is part of wider networks such as the Leeds City Region and North Yorkshire. The York economy has been fairly resilient in recent times with levels of employment good. However, these market forces make the future uncertain.
- 4.3.16 Within the York Economic Strategy (2016), there is a determination to make York the most competitive City of its size, not only in the UK but globally and build capacity in sectors to drive growth. Some of the work delivering this strategy is independent of the Local Plan and therefore it is anticipated that progress may be made in a 'policy-off' scenario, although the timescales for this may be slower without the steer of a complementary economic planning policy. Furthermore, York is a key tourist destination with tourism benefitting the City across many different industry sectors. This is likely to continue due to the existing historic assets within the City, particularly the City

²⁷ City of York Council Schools and Education information. Available via: https://www.york.gov.uk/homepage/49/schools_and_education [accessed July 2017]

Centre. There is ongoing work to ensure York maintains this role and whilst policy intervention would further support this, it is not unreasonable to assume that York would continue to be a desirable destination regardless.

- 4.3.17 Should York's economy grow in line with the aspirations, a key policy for delivering sites would be through the Local Plan to ensure employment land is in the right locations for the future of York. The Council's Employment Land Review (2016 and update, 2017) sets out the demand for and supply of employment land including two growth scenarios, one of which focuses on re-profiled sector growth. This scenario would see emphasis on a higher value economy by driving up the skills of the workforce and encouraging growth in businesses which use higher skilled staff. Without an adopted and up to date Local Plan, market forces and the application of the NPPF's 'presumption in favour of sustainable development' would determine the location and type of new development and this may conflict with other City assets/visions and the long term interests of the City.
- 4.3.18 There is a clear link between York's population and the continuance of a vibrant economy through the working age population. In order to support economic growth, there needs to be a relevant workforce with the skills and/or training ability to support businesses. York will continue to have two universities, two higher and further education colleges and primary/secondary education facilities. York's strength through the economic downturn has been recognised as its highly skilled workforce. These institutions would be better supported through policy intervention should there be any intended growth of the establishments or in the population; particularly for delivery of primary and secondary education to all.

Key Sustainability Issues

- ▶ A key challenge is to achieve economic growth which reflects the vision for the City in a sustainable manner; ensuring growth protects the environment whilst allowing social and economic progress that recognises the needs of all people;
- ▶ The number of those seeking out of work benefits is lower than the region and nationally with the percentage of 16-64 year olds considered economically active higher. This needs to be sustained;
- ▶ York has a highly skilled labour force which has had a positive influence on the City's economic stability and employment rates;
- ▶ The relative dependence on public sector employment is decreasing with the increase in private sector business and employment;
- ▶ The number of vacant shops in the City Centre is decreasing and the vacancy rate is below the national average although football declined at the start of the decade;
- ▶ The authority has a duty to provide and support education for all for the development of skills and learning;
- ▶ The results attained at primary, secondary, further and higher education levels are good and need to be maintained.

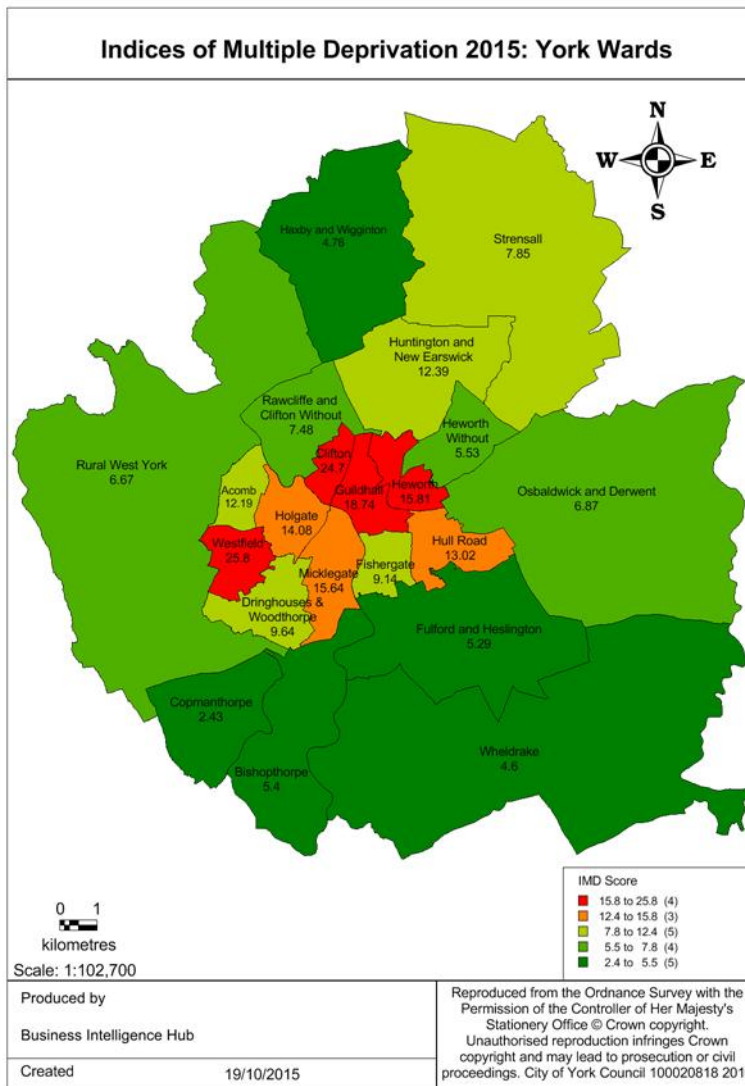
4.4 Deprivation and Equality

Deprivation

- 4.4.1 The 2015 Index of Multiple Deprivation (IMD) shows that York is ranked 259th most deprived district in England, out of 326 local authority areas (where 1 is the most deprived and 326 the least). York's ranking improved from 234th in 2010 and in 2004 it stood at 219th. This shows overall improvements against the measures of deprivation. York is ranked as the 2nd least deprived local authority district in the Yorkshire and Humber region (with Harrogate being the least deprived). In 2004, York was ranked 8th. Clifton, Guildhall, Heworth and Westfield are the most deprived wards

in the City area (see **Figure 4.5**).²⁸ None of York's district's neighbourhoods (known as Lower Super Output Areas within the IMD) ranked in the top 10% most deprived nationally. In 2010 there was one. Nine rank in the top 20% nationally in 2015.

Figure 4.5 Indices of Multiple Deprivation 2015: York Wards



Source: City of York Council Open data. Available via: <https://data.yorkopendata.org/dataset/indices-of-multiple-deprivation/resource/900f794a-eee1-4326-af98-64ea18fa1d07> [accessed July 2017]

Access to Housing and Suitable Accommodation

4.4.2 The average house price in York was £242,204 in November 2017²⁹ having increased from £56,382 in January 1995 (see **Figure 4.6**). This is very slightly below the national average which stands at £243,339. Detached properties sold for an average of £385,719, semi-detached for £247,078, terraced properties for £207,615, and flats/maisonettes £164,432.

²⁸City of York Council Deprivation in York 2015 – Presentation. Available via: <https://data.yorkopendata.org/dataset/indices-of-multiple-deprivation/resource/900f794a-eee1-4326-af98-64ea18fa1d07> [accessed July 2017]

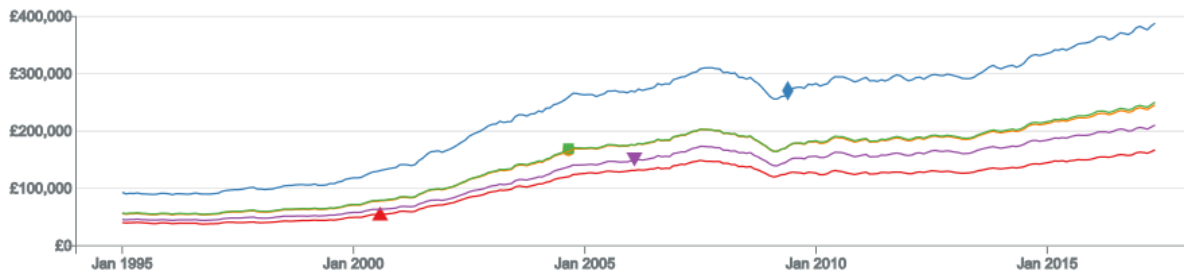
²⁹ UK House Price Index <http://landregistry.data.gov.uk/app/ukhpi> [accessed February 2018]

- 4.4.3 The average house price is now around eight times the annual average salary of a York resident and exemplifies why the need for affordable housing within the City is significant because many people earn less than that required to obtain a mortgage to own a home within the City.

Figure 4.6 Average House Price (1995-2017)

Average price: York from January 1995 to July 2017

Key: ● all property types ◆ detached houses ■ semi-detached houses ▼ terraced houses ▲ flats and maisonettes



- 4.4.4 However, despite the rise in house prices, the IMD shows that the City's ranking for the barriers to housing and services indicator in 2015 was 251st (out of 326 with 326th being the least deprived). This is similar to the level in 2004 (253rd) and is slightly improved from the ranking in 2007 and 2010 (where the City ranked 224th).
- 4.4.5 The Housing Strategy Statistical Appendix (HSSA) data returns for 2015-16³⁰ (as of 1st April 2016) highlight that there were 1,216 households on the City of York Council housing register. The demand is mainly for one or two bedroom properties but there is also a small demand for more family housing. The return also stated that there were 45 publically owned dwellings which were vacant.
- 4.4.6 There is demand for more sites for the Gypsy and Traveller community within York as it is known that existing sites are at capacity and some people from this community live in conventional dwellings, which does not necessarily suit their lifestyle. The Gypsy, Roma, Traveller and Travelling Showpeople Accommodation Assessment (2014)³¹ initially identified the requirement for pitches and plots. Following the publication of the Government's Planning Policy for Traveller Sites (PPTS) (2015) which amended the planning definition of Travellers, the City of York Council updated the need assessment in 2017³². **Table 4.4** sets out the need identified.

Table 4.4 Additional Gypsy, Traveller and Travelling Showpeople Need

Need	Years 0-5	Years 6-10	Years 11-15	Year 16	Total
Gypsy and Traveller pitches					47
Need for those meeting the planning definition	0	1	1	0	2
Need for unknown households	7	2	2	1	12

³⁰ Local authority housing statistics data returns for 2015 to 2016 (2017) <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2015-to-2016> [accessed July 2017]

³¹ City of York Council (2014) Gypsy, Roma, Traveller and Travelling Showpeople Accommodation Assessment prepared by Peter Brett Associates. Available via: https://www.york.gov.uk/download/downloads/id/2093/gypsy_roma_traveller_and_travelling_show_people_-_site_identification_study.pdf [accessed July 2017]

³² City of York Council (2017) Gypsy and Traveller Accommodation Assessment Update prepared by Opinion Research Services. Available via:

http://www.york.gov.uk/download/downloads/id/14271/gypsy_and_traveller_accommodation_assessment_update_2017.pdf [accessed January 2018]

Need	Years 0-5	Years 6-10	Years 11-15	Year 16	Total
Additional need for those not meeting the planning definition	19	6	7	1	33
Travelling Showpeople plots	2	0	0	1	3

- 4.4.7 The demand for older person housing is also set to increase due to the ageing population of York. The York Strategic Housing Market Assessment (SHMA) identifies that over the 2012-2033 period there is an identified need for 84 specialist units of accommodation for older people (generally considered to be sheltered or extra-care housing) per annum. The SHMA also identifies a potential need for an additional 37 bedspaces per annum for older people (aged 75 and over) for nursing and residential care homes in the 2012- 2033 period. The population of those over 65 is expected to grow through the plan period.

Access to Leisure and Community Facilities

- 4.4.8 York has over 300 sports clubs and a great variety of physical activity programmed all year round in various locations across the City. The City has two Council-run swimming pools and gyms as well as other private gym and swimming facilities. There is support for the “just 30” campaign to get people undertaking an activity for 30 minutes of moderate exercise a day and targeted campaigns for different age groups to take up a leisure activity. Further to this, the Council area has nine formal parks and gardens as well as numerous informal open spaces.
- 4.4.9 Aside from the sports and open space facilities in York, there are a number of social facilities such as community halls, venues for clubs and societies to meet, libraries, youth facilities and public houses.
- 4.4.10 Aside from the sports and open space facilities in York, there are a number of social facilities such as community halls, venues for clubs and societies to meet, libraries, youth facilities and public houses.

Likely Evolution without the Plan

- 4.4.11 Evidence from the IMD has shown that York has generally become less deprived since the indicators were compiled in 2004. Improvements have been made due to and independently from the planning system. It is not unreasonable to suggest that this trend may continue without planning policy intervention.
- 4.4.12 However, one of the main inputs into the IMD is major barriers to housing which may be exacerbated should the market not provide suitable accommodation. Householders are likely to become in more need of affordable housing options, with the mean affordability ratio between prices and pay of around 8 to 1. This housing may not be delivered without policy intervention based on up to date development viability information. This could make sectors of the population vulnerable or exposed to limited accommodation choices. Evidence in the SHMA already considers that the shortage of suitable property sizes is having a disproportionate effect on the City’s capability to address a backlog of housing need and this situation may become exacerbated should a policy on housing growth and affordable housing delivery not be implemented.
- 4.4.13 There is a recognised need for Gypsy and Travellers accommodation sites. It is unlikely that this will be provided without planning policy intervention. Additionally, the needs of the growing ageing population are unlikely to be met without planning policy intervention to direct development to meet specific demands of the older population.
- 4.4.14 Planning policy support for local provision of services and facilities is also important. Whilst there are parades at present as well as independent shops, it would be beneficial for new development to include or respond to a lack in provision to support the population. It is unlikely that this would be market-led, particularly in smaller scale schemes, and therefore a policy off scenario may see services, facilities and open space in some areas become overstretched or conversely, unviable.

Key Sustainability Issues

- ▶ York has generally become less deprived (based on IMD indicators) but still has pockets of high deprivation which need to be addressed;
- ▶ Demand for affordable homes is high;
- ▶ York has areas which feature within the top 20% most deprived in the country in terms of barriers to housing, although the number has decreased between 2004 and 2015;
- ▶ A major barrier to housing is the disparity between the cost of housing and how much people earn as well as access to funding such as mortgages. Average house prices are higher in the City than England as a whole;
- ▶ The provision of other types of homes for the elderly, including nursing homes, residential care homes and warden assisted living as well as support services will also need to be developed;
- ▶ There is a recognised need for Gypsy and Traveller and Showpeople sites.

4.5 Community Safety

4.5.1 The total crime and anti-social behaviour rates have both decreased between 2013/14 and 2016/17 (see **Table 4.5**). Total crime fell from 13.3 per 1,000 population in 2013/14 to 11.4 in 2016/17. For anti-social behaviour the rate fell slightly from 10.9 to 9 per 1000 population.³³

Table 4.5 Crime rates and antisocial behaviour

Year	Total Crime per 1,000 population	Total anti-social behaviour per 1,000 population
2013/14	13.3	10.9
2014/15	11.7	10.9
2015/16	12.3	9.3
2016/17	11.4	9.0

4.5.2 The Big York Survey (2013) which was carried out by City of York Council and the Crime Survey carried out by the University of York in 2012 revealed that three-quarters of respondents felt that York was a safe place with over 90% of respondents stating that they were satisfied with their local area as a place to live. Most also had very positive views about the levels of crime and anti-social behaviour in their areas with the issue of rubbish or litter generally being the biggest cause for concern.

4.5.3 Data has been compiled in relation to perception of safety more recently. The percentage of people in York who feel that York is a safe city to live in and is relatively free from crime and violence stood at 77% in 2015/16. This was marginally higher than the 74% of respondents in 2012/13 but below the 80% who agreed it was a safe place to live in 2013/14.³⁴

4.5.4 The Community Safety Plan (2015)³⁵, prepared by the Safer York Partnership, sets out a number of priorities which include: reducing harm caused by alcohol; reducing the victims of crime; reducing victims of anti-social behaviour; and protecting vulnerable children.

³³ Business Intelligence Hub (2013-17) York Profile <https://data.yorkopendata.org/dataset/york-profile> [accessed July 2017]

³⁴ Business Intelligence Hub (2017) % of panel who agree that York is a safe city to live in, relatively free from crime and violence dataset. Available via: <https://data.yorkopendata.org/dataset/kpi-bys131> [accessed July 2017]

³⁵ Safer York Partnership (2015) Community Safety Plan 2014-17. Available via: <https://www.saferYorkpartnership.co.uk/wp-content/uploads/CommunitySafety-PlanRefresh2015.pdf> [accessed July 2017]

Likely Evolution without the Plan

- 4.5.5 Delivering key safety protection measures are primarily out of the remit of the Local Plan. The Community Safety Plan sets out a number of objectives to deliver a safer City and other organisations, such as the Safer York Partnership, would ensure that initiatives and schemes were in place for the safety of residents and businesses. It would be reasonable to assume that the current crime trends would continue although local planning policy could support crime reduction through, for example, high quality design.

Key Sustainability Issues

- ▶ People generally think York is a safe place to live;
- ▶ Crime rates are decreasing;
- ▶ Support for the future should be aimed at helping to meet the objectives and identified priorities set out in the Community Safety Plan.

4.6 Health

- 4.6.1 The 2017 Health Profile for York produced by Public Health England³⁶ highlights that the health of the City's population is varied compared to the average across England, performing better in some areas but worse in others. The national trend for life expectancy to increase is reflected in York's ageing population and life expectancy for both men (80.2) and women (83.4) is slightly higher than the England average (79.5 and 83.1 respectively). There is also a marked difference in life expectancy across the Borough. Life expectancy is 7.3 years lower for men and 4.5 years lower for women in the most deprived areas of York than in the least deprived areas. Approximately 12% (3,600) of children live in poverty.
- 4.6.2 Data shows that the main causes of death within York for both males and females are cancers and illnesses connected to the circulatory system. Aside from these two causes, deaths from heart disease are also high³⁷. The proportion of York's population that stated they have very good health was nearly 50% at 2011. Only 4.1% stated they had bad or very bad health, lower than regional or national figures of 6% and 5.6% respectively³⁸.
- 4.6.3 In 2015/6, 56.4% of adults had excess weight whilst 15.1% of (Year 6) children were classified as obese. The rate of alcohol related harm hospital stays was 658 (per 100,000 population), worse than the average for England (which was 647 stays per 100,000). The rate of self-harm hospital stays was 253 (per 100,000 population). This was worse than the average for England which stood at 196 stays (per 100,000 population). The rate of smoking related deaths was 274 (per 100,000 population). This was better than the average for England which was 283 deaths (per 100,000 population). Estimated levels of adult physical activity are better than the England average.

Likely Evolution without the Plan

- 4.6.4 The health of York's population is out of the direct influence of planning policy and relies on education and personal commitment of individuals. It is likely that current health trends will continue and that obesity will continue to become increasingly prevalent. The City has a number of sports centres, parks and greenspaces to support physical exercise and health and well-being.
- 4.6.5 A policy-off scenario would see the status quo position with incremental improvements to different areas. Conversely, planning policy could help support the identified need for open space, green infrastructure and built sports facilities through protection and delivery of facilities and spaces. This would help to support the health of the population more than by incremental changes alone. Planning policy could also help to ensure the future provision of health facilities and services to

³⁶ Health Profile for York (2017). Available via: <http://fingertips.phe.org.uk/profile/health-profiles/> [accessed January 2018]

³⁷ ONS 2011 Census health data. Available via: <https://www.ons.gov.uk/search?q=health+local+authority> [accessed July 2017]

³⁸ ONS 2011 Census health data. Available via: <https://www.ons.gov.uk/search?q=health+local+authority> [accessed July 2017]

meet local needs and that new development does not give rise to adverse impacts on human health.

Key Sustainability Issues

- ▶ The general health of citizens in York is good;
- ▶ The main priorities to address are obesity, particularly in children, alcohol and physical activity.

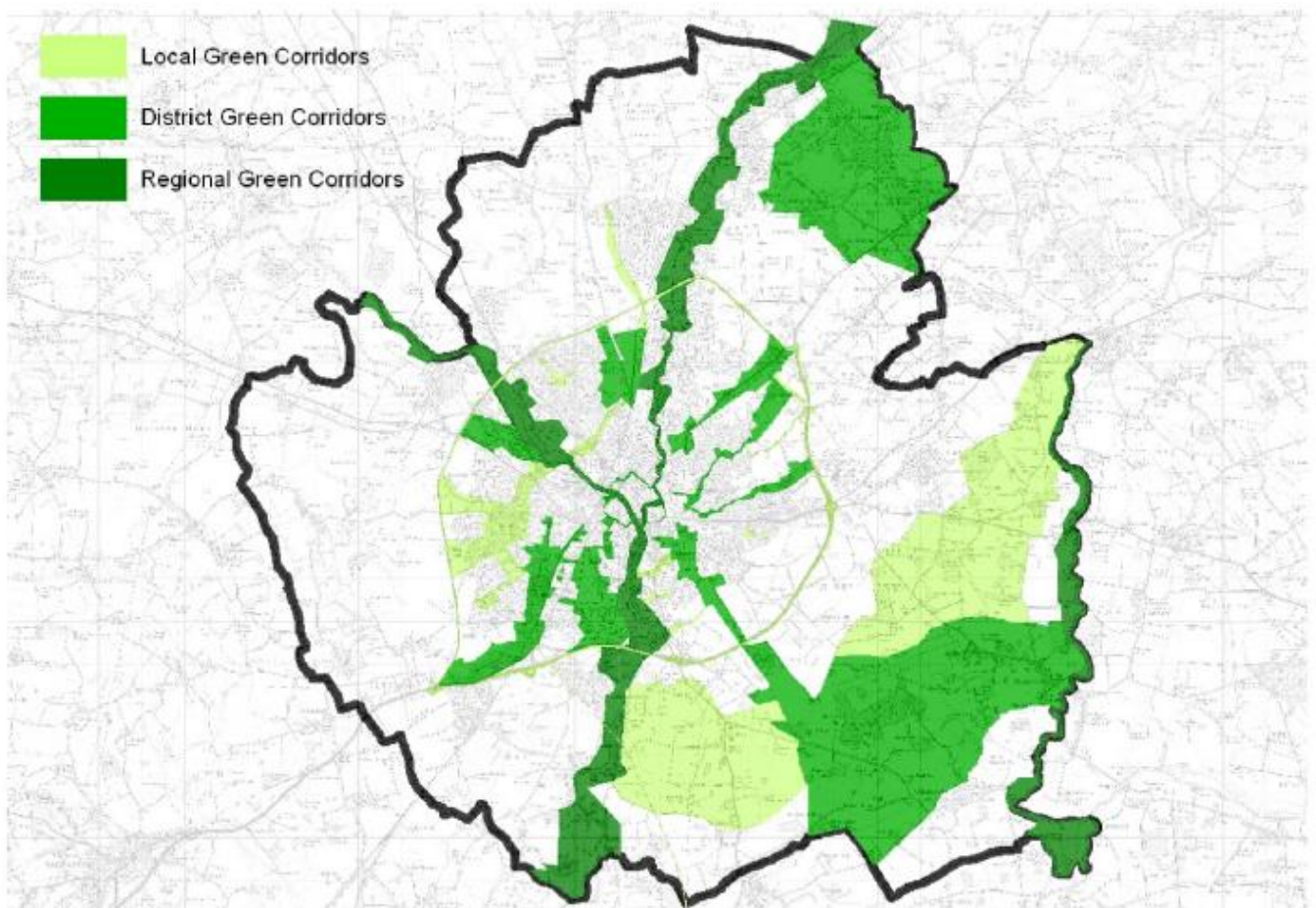
4.7 Green Infrastructure and Biodiversity

4.7.1 Green Infrastructure (GI) encompasses all “green” assets in the authority area, including parks, the river corridors, street trees, managed and unmanaged sites and designed and planted open spaces. A number of these are also recognised heritage assets within the City. For example, the greenspaces alongside the City Walls, the historic Strays and the designated Registered Parks and Gardens such as Museum Gardens all contribute to open space and recreational areas. Together, all of these assets make a GI network cross the City with a variety of uses including: nature conservation, open space and green corridors and linkages.

Green Corridors

4.7.2 York has a number of nationally, regionally and locally important green corridors, as identified in **Figure 4.7**.

Figure 4.7 Green Corridors



Biodiversity

- 4.7.3 Within a relatively small area (272 square kilometres), the York area boasts a range of sites with habitat and conservation value. 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.
- 4.7.4 York contains a number of nationally and internationally important designated nature conservation sites (see **Figure 4.8**). Using the North Yorkshire system of a more regionally based assessment of sites, City of York Council has undertaken an audit of sites to provide an understanding of the nature conservation and biodiversity value within the authority. The audit identified that currently there are 886 hectares of wildlife habitats, which represent 3.2% of the total authority area. It also identified local Sites of Importance for Nature Conservation (SINCs). The original Biodiversity audit (1996)³⁹ found 42 SINCs within the authority boundaries, nine Sites of Special Scientific Interest (SSSI), three of which were also of international significance as Ramsar, Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) (see **Table 4.6** for condition and threats to these sites). The most recent audit⁴⁰(2010) has found that five of these sites no longer meet the requirements but that a further 49 new sites fulfil this criteria. Furthermore, 87 additional sites have been recorded for their wildlife value but do not formally make the criteria to be a SINC.

Table 4.6 Condition of statutory designated sites

Designated site	Condition	Threats
Strensall Common SAC, SSSI	The underpinning SSSI (which is notified for similar features but under domestic legislation) is considered by Natural England to be in favourable or unfavourable-recovering condition.	The site is vulnerable to the effects of nitrogen deposition from vehicle emissions. It is also subject to considerable visitor pressure although an established network of paths reduces trampling pressure. In addition, regular closures of much of the heath by the MOD to allow safe operation of the adjacent firing ranges also helps manage this pressure. However, the wet heath habitat is particularly vulnerable, not only to erosion etc, but also changes to the local hydrological regime and so construction proposed nearby will require careful scrutiny.
River Derwent SAC (River Derwent SSSI and Newton Mask SSSI)	There are two component SSSIs – the River Derwent and Newton Mask. Natural England has assessed 99.6% of the River Derwent SSSI to be in 'favourable' or 'unfavourable recovering' condition; 0.4% is 'unfavourable no change' but the threat level is considered to be 'high' across a much wider area. All of Newton Mask SSSI is considered to be in favourable condition but carries a 'medium' threat level.	Overall, the site is relatively robust but vulnerable to changes in water quality from wastewater disposal, for instance.
Lower Derwent Valley SAC, SPA & Ramsar (Derwent Ings SSSI, River Derwent SSSI, Newton Mask SSSI, Brighton Meadows SSSI, Melbourne and Thornton Ings SSSI)	There are five component SSSIs. Natural England has assessed all of the Derwent Ings SSSI to be in 'favourable' or 'unfavourable recovering' condition. 99.6% of the River Derwent SSSI is considered to be in 'favourable' or 'unfavourable recovering' condition; only 0.4% is considered to be 'unfavourable no change' but the threat level is considered to be 'high' across a much wider area. All of Newton Mask SSSI, Brighton Meadows SSSI and Melbourne and Thornton Ings SSSI are considered to be in favourable condition but carry a	Limited car parking and a formal arrangement of screens, footpaths and hides effectively reduces the impact of existing recreational pressure although some 'informal' access occurs. Despite this, the site is relatively robust but large increases in the number of local residents (and visitors) may be difficult to accommodate without substantial mitigation including, perhaps, the establishment of new wet grassland with associated visitor facilities in less fragile locations elsewhere. The European

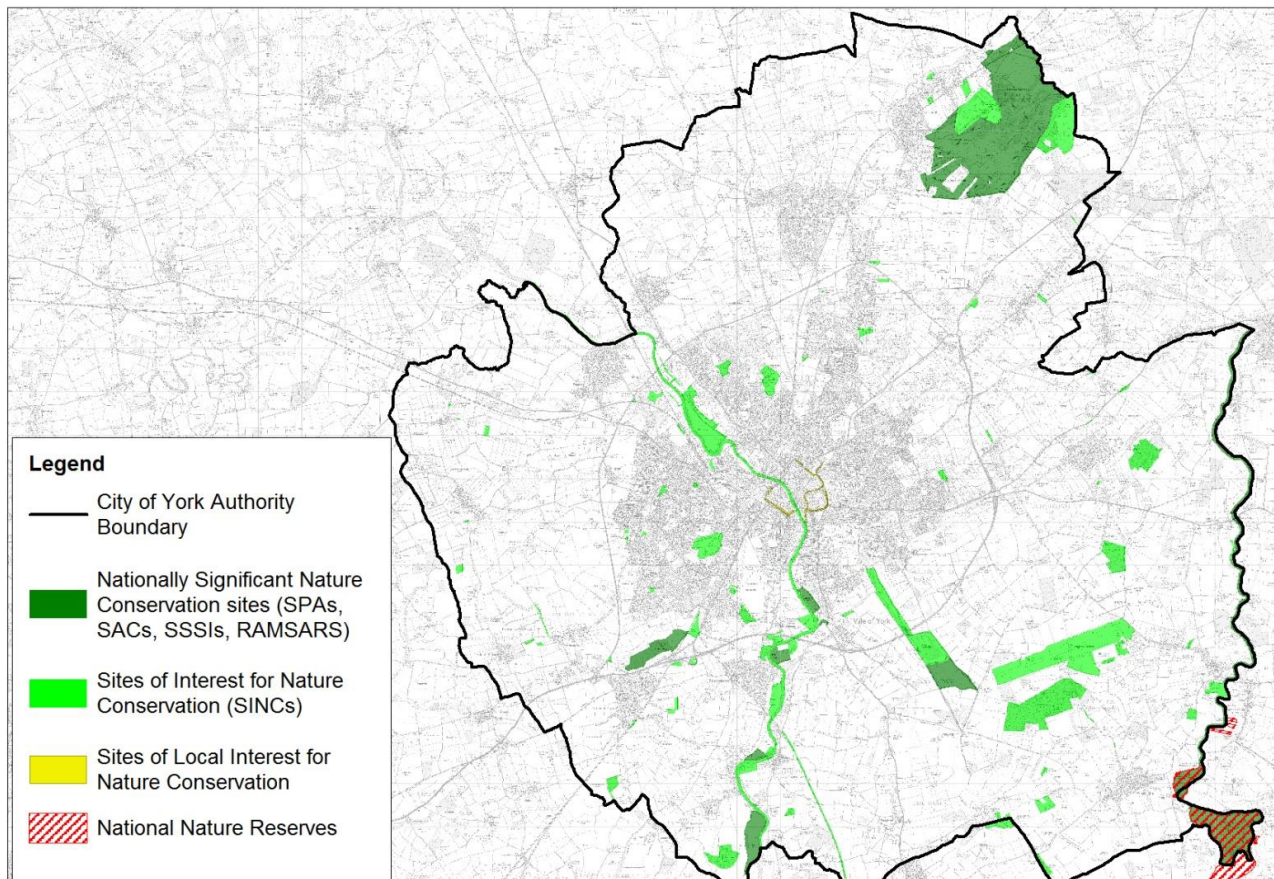
³⁹ York City Council, 1996, Biodiversity audit

⁴⁰ York City Council, 2010, City of York Biodiversity Audit, available from <http://democracy.york.gov.uk/documents/s46232/Bio%20Audit%20Review%202010%20with%20appendices%203%20-%20online%20only.pdf> [accessed July 2017]

Designated site	Condition	Threats
	range of threats from none to high, especially for the latter at Brighton Meadows.	site has a number of threats including public pressure, air pollution and invasive species.

Source: Habitats Regulation Assessment Preliminary Assessment for City of York (2017)

Figure 4.8 Designated Nature Conservation Sites



4.7.5 York also has a total woodland cover of 998 hectares, which is 3.7% of the total land area and approximately 5.5 hectares per 1,000 population. This is lower than the regional coverage (Yorkshire and the Humber) of 5.8% of the total land area and 18.2 hectares per 1,000 population. Treemendous York, an initiative promoted by the community and City of York Council, had a target of planting 50,000 new trees between 2011 and 2014.

Open Space

4.7.6 Open space in York includes approximately 480 hectares of parks and open spaces. Existing open space, however, is not distributed in a uniform manner across the City and deficiencies have been identified for different categories as a result with clear deficiencies in provision for children/teenagers. Overall, survey data from 2013 suggest that the City is well served for open space⁴¹ although an update in 2017⁴², based on the ward boundaries revised in 2015, indicate that a number of wards (particularly Strensall, Wesfield and Wheldrake) are in deficit for the majority of open space typologies.

⁴¹ Local Plan Evidence: Open Space and Green Infrastructure (2014) Prepared for City of York Council by Amec https://www.york.gov.uk/downloads/file/2096/open_space_study.pdf [accessed July 2017]

⁴² Local Plan Evidence: Open Space and Green Infrastructure Update (2017) prepared by City of York Council http://www.york.gov.uk/download/downloads/id/14274/open_space_and_green_infrastructure_update_2017.pdf [accessed Jan 2018]

- 4.7.7 Five of York's parks and gardens have achieved Green Flag Award Status based upon the quality and provision of facilities within the parks. These parks are:
- ▶ Clarence Gardens;
 - ▶ Rowntree Park;
 - ▶ Westbank Park;
 - ▶ Rawcliffe Country Park; and
 - ▶ Glen Gardens.
- 4.7.8 Two places in York have also received a Green Flag Community Award for their Gardens: The Nose, St Clement's Church who grows edible plants for local people deprived of growing space, and St Nicholas Field, which is a former rubbish tip transformed into an urban nature park and designated local nature reserve.
- 4.7.9 York has had a growing focus on the importance of play for a number of years and new funding also provides a number of play areas throughout the City. Some of these have benefitted from the Government's Playbuilder Project.

Likely Evolution without the Plan

- 4.7.10 York has a vast variety of open space, sport and recreation spaces within the City with the majority of the City having access to different types of space. The maintenance of these assets is largely outside the control of planning. However, there are identified deficiencies in some types of open space and without policy intervention this may remain the case in the future with incremental improvements to open space around the City on an adhoc basis. The positive contribution planning policy could make would be to support and protect open space and address the identified deficiencies through delivery of new open space areas within new developments and designations.
- 4.7.11 York has a number of international, national, regional and locally recognised nature conservation sites. The designation and quality of these are largely out of the remit of planning and there are ongoing schemes to ensure their quality and maintenance. There are also ongoing initiatives to support nature conservation and biodiversity, including stewarding schemes and the Treemendous project. It is reasonable to assume that in these cases the current situation would remain as the status quo. Biodiversity and nature conservation are vulnerable to changes, however, and lack of policy to support their integrity through sensitive location of development may have a negative effect on overall biodiversity and natural assets. Designated conservation sites can be particularly vulnerable to air quality impacts related to increases in traffic. In particular, sites close to main roads can be vulnerable to the effects of Nitrogen oxide deposition. Through planning policy, opportunities may also be realised to enhance designated sites and biodiversity more broadly through, for example, habitat creation and management.

Key Sustainability Issues

- ▶ Whilst open space in York includes approximately 480 hectares of parks and open spaces, it is not distributed in a uniform manner across the City and therefore some areas are deficient in certain types of open space;
- ▶ The quality of large parks and gardens in York is good with five designated as Green Flag Award Status;
- ▶ York has an abundance of important sites for nature conservation at international, national, regional and local levels;
- ▶ The City's nature conservation sites support a diverse range of flora and fauna;
- ▶ Initiatives are ongoing to support nature conservation/open spaces around the City.

4.8 Water, Flooding and Flood Risk

Flooding

- 4.8.1 York sits astride the confluence of the River Ouse and River Foss. The River Derwent forms the eastern boundary between York and the East Riding of Yorkshire. These three rivers drain three catchments, the Yorkshire Dales, the Howardian Hills and the North York Moors respectively. The interaction of the rivers, with the significant amount of rainfall the catchments attract, along with snowmelt in winter, makes the City particularly susceptible to flooding. Historically, major flood events have followed rapid snowmelt in the hills. The 1982 flood, following which significant defences were built to protect vulnerable areas of the City, was calculated to have a return period of 1 in 100 years.
- 4.8.2 The flood event in 2000 was as a result of rainfall alone, following a very wet autumn. It flooded 353 properties and threatened a further 3,500. Subsequent modelling calculated this flood to have a return period of 1 in 80 years⁴³. **Figure 4.9** shows the areas within York that are categorised as being in Flood Risk Zones 2 and 3 within York's Strategic Flood Risk Assessment⁴⁴.
- 4.8.3 The Preliminary Flood Risk Assessment (2011) produced by York City Council considered the historic incidences and potential for future flooding from surface water flooding, groundwater and canal and ordinary watercourse flooding. These are considered in turn below:
- ▶ **Surface Water Flooding** – the Council has limited records of past surface water flooding. The most comprehensive records relate to the consequences of intense rainfall in June 2007 when areas in Haxby, Wigginton, Rufforth, Strensall, Clifton, Rawcliffe, Acomb and Holgate were affected by very localised rainfall events ranging from a 1 in 7 to 1 in 100 year return period. The flooding mostly affected roads where the rainfall exceeded the drainage infrastructure capacity of 1 in 30 years.
 - ▶ **Groundwater Flooding** – this occurs as a result of water rising up from the underlying aquifer or from water flowing from abnormal springs. This tends to occur after long periods of sustained high rainfall and the area's most at risk are often low-lying where the water table is more likely to be at a shallow depth. The Council has no records of areas where groundwater emergence is known to be a cause of flooding.
 - ▶ **Canal and Ordinary Watercourse Flooding** – whilst there are no artificial canals in the York area, the river Foss is a canalised main river. In 2006, ordinary watercourses with potential to cause property flooding were designated main river. The main river reaches of Blue Beck, Burdyke, Holgate Beck, Tang Hall Beck and Osbaldwick Beck, and the ordinary watercourse Elvington Beck have all flooded property due to backing up from the Rivers Ouse, Foss and Derwent. There is no evidence of historic flooding from the ordinary watercourses in the outlying rural areas. Within suburban areas, Westfield Beck (to the west of Haxby) reached a level in June 2007 high enough to flood gardens and roads. Problems associated with the efficiency of Westfield Beck pumping station which were considered to have exacerbated this problem have now been addressed. Elvington Beck is identified as a source of surface water flooding following intense rainfall. This was caused in part by restricted capacity due to a lack of maintenance although this is now being addressed.
- 4.8.4 Flood risk is predicted to alter in the future due to climate change and sea level rise. Climate change may result in different rainfall patterns and sea level rise, which could increase the flood risk in the tidal parts of the Ouse catchment area. The Local Flood Risk Management Strategy 2015 states that almost 4000 homes and businesses in the City area are at risk of flooding from rivers and proposes a series of actions to help manage and address flood risk in the area, co-ordinating action across a range of organisations.
- 4.8.5 Groundwater vulnerability is classified based on the characteristics of the aquifer. York sits on the Sherwood Sandstone Principal Aquifer. Where the Sherwood Sandstone is covered by permeable

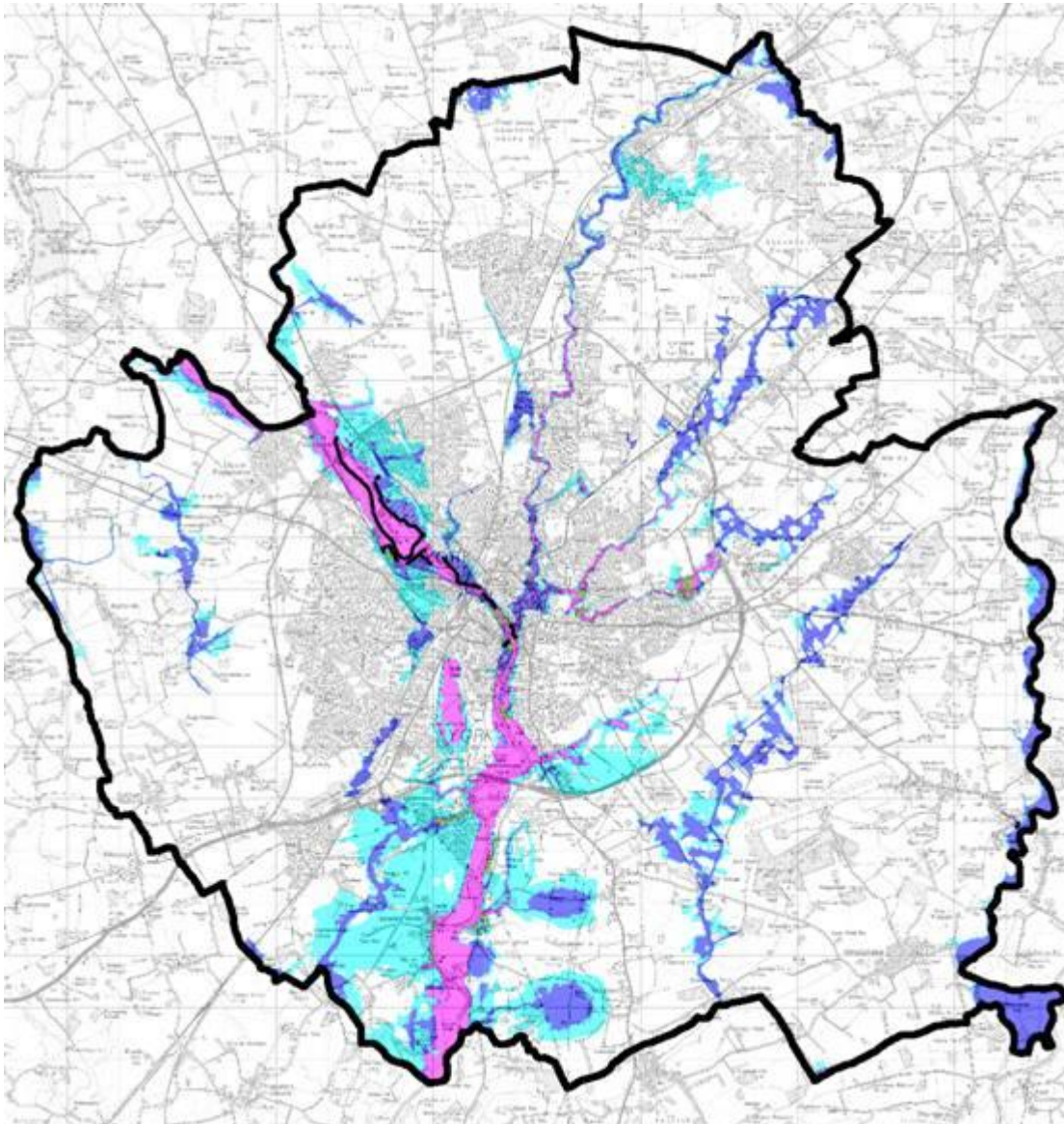
⁴³ York City Council, 2013, *Strategic Flood Risk Assessment Revision 2*

⁴⁴ York City Council, 2011, *Strategic Flood Risk Assessment*






sand and gravel deposits, the groundwater is vulnerable to pollution by surface activities (including areas where contaminated land is present). Where the Sherwood Sandstone is covered by a substantial thickness of clay, which has a low permeability, the groundwater will generally be protected against pollution from surface activities.⁴⁵

⁴⁵ York City Council, 2016, Contaminated Land study

Figure 4.9 Flood Risk in York



SFRA 2011 Flood Risk Zones Legend:

<p>All Uncoloured Areas</p>     	<p>Zone 1: Less than 1 in 1000 annual probability of flooding in any year (<0.1Percent)</p> <p>Zone 2: Between 1 in 100 and 1 in 1000 annual probability of flooding in any year (1Percent to 0.1Percent)</p> <p>Zone 3a: Areas between 1 in a 100 and 1 in 25 annual probability of flooding in any year (1 to 4 Percent)</p> <p style="padding-left: 20px;">3a - Defended up to 1 in 50, Flood Risk between 1 in 50 and 1 in 100 (2 to 1 Percent)</p> <p style="padding-left: 20px;">3a - Defended up to 1 in 100 (1Percent)</p> <p>Zone 3a(i): Developed areas with up to a 1 in 25 or greater annual probability of flooding in any year (4 Percent or greater)</p> <p>Zone 3b: Areas with up to a 1 in 25 or greater annual probability of flooding in any year (4 Percent or greater)</p> <p>Flood Defences</p>
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Water Quality

4.8.6 According to the Vale of York Profile (Natural England⁴⁶), groundwater quality is good in the east but poor in the west of the City. All the rivers that have been assessed are of good chemical

quality, including the rivers Ure and Ouse in the west. The ecological quality of the rivers in the area is classed as moderate, although a small stretch of river associated with the tributaries of the River Wharfe is classed as poor, as is the River Foss.

- 4.8.7 The Swale, Ure, Nidd and Upper Ouse (SUNO) Catchment Abstraction Management Strategy (CAMS) was updated in February 2013. The SUNO CAMS encompasses an area of 3,509km² of North Yorkshire.
- 4.8.8 The SUNO CAMS area is mostly rural farmland but incorporates the towns of Richmond, Northallerton, Knaresborough, Thirsk and Harrogate and the cities of Ripon and York. The resident population of the York, Harrogate, Hambleton and Richmondshire authorities is around half a million people, with seasonal visitor numbers increasing this substantially. There is a long history of industrial and commercial activity in the area, although tourism, the service industry, recreation and agriculture are now the dominant economic sectors.
- 4.8.9 The west of the CAMS area is largely made up of the Pennines and Yorkshire Dales National Park. Managed grassland in the lowlands provides areas for livestock grazing and breeding, while heather moorland is more frequent in the uplands. Within the Vale of York to the east, arable farming is more common. Small areas of woodland are scattered throughout most of the region, but can be found in a greater concentration in the north east of the area which includes a section of the North York Moors National Park.
- 4.8.10 The rocks of the SUNO CAMS area range in age from Carboniferous (c.360 million years ago) to Triassic (c.248 million years ago) and consist mainly of sedimentary limestones, sandstones, mudstones and shales. The west of the catchment is primarily Carboniferous Limestone and Millstone Grit with drift deposits of typically less than 3m thick, meaning the aquifers are in good connectivity with surface waters. In the River Swale catchment and in the northeast and central area however, the rocks are covered by drift deposits that are often more than 20m thick. As a result of this, the underlying Magnesian Limestone and Sherwood Sandstone aquifers are more detached from surface flows.
- 4.8.11 The hydrology of the area is varied as a result of the contrasting rainfall, topography, geology and soils in the region. In the west of the SUNO CAMS, moorland rising more than 500m above sea level receives between 1,300-1,800mm mean annual rainfall. Steep valley slopes and seasonally waterlogged soils can lead to a rapid surface runoff response, meaning river levels rise quickly when it rains. In the central and east of the CAMS area, the land is primarily low lying, at elevations of 15-50m above sea level, with a mean annual rainfall between 600-750mm. The low gradients and generally less intense rainfall mean that flow rates in these tributary catchments rise at a moderate to slow rate following rainfall.
- 4.8.12 About two thirds of surface water abstractions in the SUNO CAMS area are for hydropower generation, although these licences are non-consumptive, meaning the water is returned rather than used. Public water supply represents the most consumptive use of abstracted water in the area and makes up about a third of the total licensed volume.
- 4.8.13 The SUNO CAMS area rivers are an important recreational resource for angling, canoeing and boating. The area also has a rich diversity of historic and archaeological sites such as York Minster, Fountains Abbey, Maidens Castle, Richmond Castle, Byland Abbey and Mount Grace Priory.
- 4.8.14 The Humber River Basin Management Plan⁴⁷, identifies that the Swale, Ure, Nidd and Upper Ouse catchment attracts many tourists because of its National Parks, natural features such as Aysgarth Falls and historic sites such as York Minster and Fountains Abbey. It extends from the heights of the North Pennine Moors, Yorkshire Dales, North York Moors and Howardian Hills down to the low-lying Vale of York in the south. It has large rural areas of grassland and livestock farming with several historic towns and cities including Northallerton, Ripon, Harrogate and York. There is a vast network of footpaths and bridleways within the catchment, such as the nationally important

⁴⁶ Natural England (2014) Vale of York: National Character Area Profile based on Humber River Basin Management Plan 2009 data. Available via: <http://publications.naturalengland.org.uk/publication/3488888> [accessed July 2017]

⁴⁷ Environment Agency (2015) Humber River Basin Management Plan

Pennine Way. The catchment also contains nationally important Ash woodlands. There are 117 river, canal and surface water transfer bodies and 14 lakes in the catchment. There are a total of 48 are artificial or heavily modified. At 2016 around 15% of all water bodies achieved good or better ecological status/potential in 2016 with 66% achieving moderate status and 21% poor or bad. 93 per cent of waterbodies were assessed as having a good chemical status.⁴⁸

- 4.8.15 Point source discharges from industry sewage works, water industry storm discharges and diffuse pollution from agriculture are key reasons for failures in the catchment. Physical modifications due to water storage and supply, urbanisation and land drainage also play a key role in determining the status of rivers and lakes in this catchment.
- 4.8.16 The River Derwent, its tributaries and wetlands are highly valued for landscape and nature conservation. The catchment extends from the North York Moors through to a more undulating landscape, then flat, low lying land near the confluence of the River Derwent and tidal River Ouse. Barmby Barrage is located at the confluence to control water quality in the lower River Derwent and to retain levels for navigation and abstraction.
- 4.8.17 The Derwent is a very rural catchment with grazing moorland in the uplands and large areas of designated conservation sites; nearly 13% of the catchment is woodlands and ancient woodlands. The seaside resort of Scarborough is the largest urban area, while inland there are dispersed market towns and villages including Stamford Bridge, Malton, Helmsley and Pickering. There are 71 river water bodies and one lake in the Derwent Humber catchment. A total of 27 are artificial or heavily modified. At 2016 around 13% of all water bodies achieved good or better ecological status/potential in 2016 with 69% achieving moderate status and 18% poor or bad. 100 per cent of waterbodies were assessed as having a good chemical status.⁴⁹ Water industry storm discharges and diffuse pollution from agriculture are key reasons for failures in the catchment.

Likely Evolution without the Plan

- 4.8.18 York has a well-documented history of flooding as the City lies at the confluence of the Rivers Ouse and Foss. Flood protection measures are already in place with improvements to these largely out of the remit of planning. York City Council is legally obliged under the Water Act to deal with flood risk management and policy. The City Council have prepared a Local Flood Risk Management Strategy which includes a series of actions for managing risk, many of which can be implemented without the Local Plan. However, flood risk in the future is set to get worse under the influence of climate change and may see York experiencing more frequent flood events with negative effects on people, property and businesses.
- 4.8.19 The Strategic Flood Risk Assessment sets out the areas at most risk from flooding. A policy off scenario may have a negative effect should development not be located where it is at low risk from flooding, although the policies in the NPPF should direct development to those areas least likely to be at risk of flooding.
- 4.8.20 Development needs to be focussed in low risk areas to avoid negative impacts on fluvial and pluvial flooding. Policy intervention would have a positive influence in using the evidence base to direct development accordingly and mitigate its effects in the future in both new schemes as well as existing areas.
- 4.8.21 The 2016 survey results from the Environment Agency state that the quality of the Rivers Ouse and Foss are very good in terms of their chemistry, biology, phosphates and nitrate concentrations. Improvements to river quality are not directly related to planning policy and therefore it is reasonable to assume that this trend will continue, although policy intervention could support improvements.

⁴⁸ Catchment Data Explorer - Swale Ure Nidd and Ouse Upper – Summary. Available via: <http://environment.data.gov.uk/catchment-planning/ManagementCatchment/3088/Summary> [accessed July 2017]

⁴⁹ Catchment Data Explorer – Derwent Humber – Summary. <http://environment.data.gov.uk/catchment-planning/ManagementCatchment/3027/Summary>

Key Issues from the Baseline

- ▶ York has a history particularly of fluvial flooding. However, all sources of flooding e.g. pluvial and groundwater flooding need to be taken into consideration in planning for the future of the City;
- ▶ Flooding is still likely to affect people and businesses in York;
- ▶ There is a need to minimise future flood risk arising from the impacts of climate change;
- ▶ Water quality is generally good or moderate with the main reasons for poor quality linked with agricultural farming practices.
- ▶ Protection of the important underlying geological integrity of the Sherwood Sandstone (which is a Principal Aquifer).

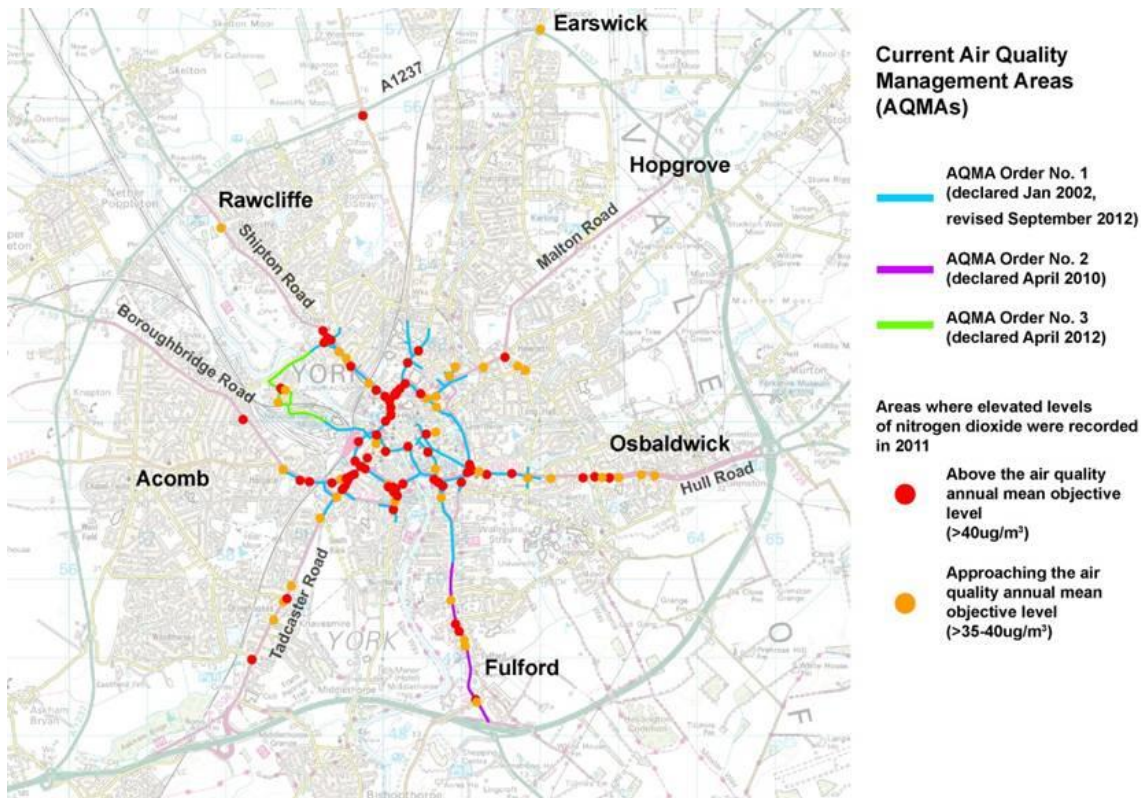
4.9 Air Quality

- 4.9.1 Current Air Quality Management Areas (AQMAs) are shown in **Figure 4.10**. Three Air Quality Action Plans (AQAPs) have been adopted by the Council to tackle air quality issues, the third of which was adopted in December 2015. The original City Centre AQMA was declared in 2002 and has also been amended. The revised order reflects the wider area of the City Centre now known to be affected by breaches of the annual average NO₂ objective and includes some additional areas where breaches of the hourly objective for NO₂ have also previously been detected (George Hudson St / Rougier St). A second AQMA was declared in Fulford in April 2010 and a third on Salisbury Terrace in April 2012.
- 4.9.2 The most recent Annual Report found that average concentrations across the majority of air quality technical breach areas increased marginally in 2016 compared with 2015, although there is evidence of a steady downward trend in nitrogen dioxide concentrations over the last 7 years.⁵⁰ The Report stated that the City Centre AQMA may need to be amended to include Coppergate. The Report recommended revocation of the Salisbury Terrace AQMA as levels of NO₂ have been below the health based annual mean objective for the last 4 years. The City of York Executive Member for the Environment approved this revocation in August 2017, whilst requiring the current levels of monitoring at Salisbury Terrace to be reported in future annual reports.
- 4.9.3 There needs to be a holistic approach to carbon and local air quality management to ensure all emissions to air are minimised as far as possible. An overarching Low Emission Strategy (LES)⁵¹ has been in place since 2012 to address this issue. The LES has achieved⁵²:
- ▶ an electric park and ride service (Poppleton Bar);
 - ▶ the world's first electric double-decker tour bus;
 - ▶ a hybrid taxi incentive scheme for taxi drivers;
 - ▶ a comprehensive 'Pay as You Go' electric vehicle recharging network in our car parks and Park and Ride sites; and
 - ▶ increased uptake of car club vehicles (particularly amongst Council staff).

⁵⁰ 2017 Air Quality Annual Status Report (ASR). Available via: <http://jorair.co.uk/wordpress/wp-content/uploads/2017/06/ASR2017.pdf> [accessed July 2017]

⁵¹ York City Council, 2012, Low Emission Strategy available from <http://www.jorair.co.uk/reports/les/Adopted%20LES%20final.pdf>.

⁵² York City Council LES achievements. Available via: https://www.york.gov.uk/info/20059/air_pollution/175/low_emission_strategy [accessed July 2017]

Figure 4.10 Current Air Quality Management Areas⁵³

Likely Evolution without the Plan

4.9.4 Nitrogen dioxide is formed during all combustion processes (primary NO₂), and can also be formed in the atmosphere from other pollutants (secondary NO₂) but the main source of nitrogen dioxide in York is traffic. Poor air quality is a leading factor in people's health and continually high pollutant levels negatively affect this. Recent air pollution monitoring data for York (2016) indicates that the annual average air quality objective for NO₂ is still being breached at a number of locations around the inner ring road (within the city centre AQMA). However, the Salisbury Terrace AQMA has been revoked. As well as impacting on human health, poor air quality related to increases in traffic can also affect designated nature conservation sites. In particular, sites close to main roads can be vulnerable to the effects of Nitrogen oxide deposition.

4.9.5 Improvements to air quality do not solely rely on planning policy. For example, changes can be made to commercial transport fleets to use low emissions technologies. However, the Council aspires to be the first low emission city and has adopted a Low Emission Strategy (LES) to provide a holistic and consistent approach to dealing with this issue. The LES could not be fully implemented without the Local Plan as a delivery mechanism meaning that air quality would continue to decline and continue to negatively affect the health of the population. Planning policy would help to ensure a consistent and cumulative approach to the consideration and mitigation of air quality within development and planning applications.

Key Sustainability Issues

- ▶ York's air quality continues to decline in the City Centre although there are improvements in other areas (the Salisbury Terrace AQMA has been revoked);

⁵³ Please note that the map shows Salisbury Terrace AQMA which is still being monitored although revoked by City of York Executive Member for the Environment – Decision Session in August 2017.

- ▶ A combination of measures is needed in order to improve air quality including a modal shift in transport and moving to low emission technologies with supporting infrastructure;
- ▶ York's ambition is to become the first low emission city.

4.10 Climate Change

4.10.1 City of York Council and the Local Strategic Partnership (Without Walls) are committed to tackling climate change through the Climate Change Framework and Action Plan (2010 – 2015). This will form the foundation for a coordinated response to climate change across the City and aims to:

- ▶ Reduce carbon emissions and other greenhouse gas emissions in line with national targets; and
- ▶ Better prepare the City to adapt to likely future changes in climate.

4.10.2 Between 2005 and 2013, city-wide emissions began to fall and reduced by about 17% from just over 1.3 million to 1.06million tonnes of CO₂ (DECC, 2015)⁵⁴. In 2014, the City generated 47,932 MWh from renewable energy sources⁵⁵. The Council has also set ambitious targets to reduce carbon emissions across the City by 40% by 2020⁵⁶ in line with the Covenants of Mayors and Friends of the Earth targets. This is being delivered through a Sustainable Energy Action Plan (SEAP) adopted in 2011. The delivery is being informed by the York Renewable Energy Study (2014) which assessed the city's potential for generating renewable energy and concluded that there is potential to generate renewable energy from a variety of available sources including wind, solar and hydro.

Likely Evolution without the Plan

4.10.3 Climate change is occurring and will continue regardless of policy intervention but without, the City's contribution towards it and its effects on the population would be exacerbated. As a Council, York has committed to reducing climate change and its impacts through the Climate Change Framework and Action Plan. Delivery of this is both supported by, and is independent to, planning policy. It would not be unreasonable therefore for progress towards reducing the City's impact on climate change to be achieved through education and behavioural change, although this progress may be more gradual than with the influence of policy intervention.

4.10.4 To understand the potential impacts of climate change on York, a Local Climate Impact Profile (2010) was produced which is a risk based assessment of significant vulnerabilities to weather and climate now and in the future. The study shows that with changes in the climatic parameters, York can expect to experience the following effects:

- ▶ Increased frequency of extreme rainfall events;
- ▶ Changes in seasonal rainfall distribution causing drier summers and wetter winters;
- ▶ Increased average daily temperatures (2.5°C);
- ▶ Increase frequency of heat waves.

Further to this, the study concludes that the main direct impacts on the City of York area are likely to be:

- ▶ Increased flooding (pluvial and fluvial);

⁵⁴ UK local authority and regional carbon dioxide emissions national statistics: 2005-2013. Available via: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2013> [accessed July 2017]

⁵⁵ Regional Renewable Statistics. Available via: <https://www.gov.uk/government/statistics/regional-renewable-statistics> [accessed July 2017]

⁵⁶ A Climate Change Framework for York 2010-2015.

- ▶ Overheating;
- ▶ Changes to biodiversity and ecosystem health;
- ▶ Pressures on water resources;
- ▶ Increased risk of disease and pests (non-human).

- 4.10.5 In addition to the direct impacts, the indirect impacts of climate change will be more frequent flood events through more frequent and intense rainfall which may lead to damage to properties, infrastructure and stress on emergency services. This would also have an effect on biodiversity, which could lead to ecosystems changes.
- 4.10.6 A policy-off scenario would particularly leave a gap in determining the most suitable location for future development and thus support for minimising the need to travel and promoting integrated infrastructure systems and transport networks, which would reduce use of the car and therefore carbon emissions.
- 4.10.7 The quality of development and requirements for the generation of renewable energy in response to climate change across York in the future will largely be dependent upon national guidance and Building Regulations. Currently, Building Regulations set out the criteria for the quality of development and requirements for sustainability. Furthermore, non-compulsory guidance from BREEAM for commercial premises sets out measures for sustainability. This guidance is not statutory, however, and would be given more support should it, or an equivalent, be included within planning policy as a requirement.

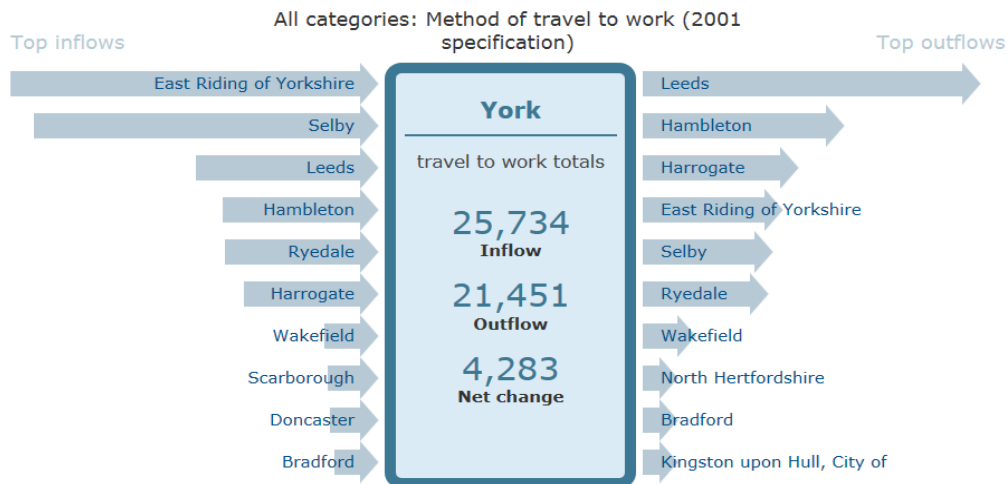
Key Sustainability Issues

- ▶ Climate change will have an impact in York at a variety of levels (see above);
- ▶ Targeted campaigns can work including those aimed at design and sustainability as well as lifestyle changes.
- ▶ There is a need to ensure that new development is adaptable to the effects of climate change;
- ▶ There is a need to mitigate climate change including through increased renewable energy and low carbon energy generation.

4.11 Transport

- 4.11.1 York is one of five local authorities in the Yorkshire and Humber region that experiences a net in-flow of trips to work, with 25,734 and 21,451 journeys to and from the York area respectively (Census, 2011). The highest number of commuters from York journey to Leeds (5,023) whilst the highest number of commuters in come to York from East Riding of Yorkshire (5,464) (see **Figure 4.11**).

Figure 4.11 Commuting patterns (2011)



Source: Nomis Web using census data

- 4.11.2 It also has nearly 71,000 internal travel to work trips daily. A relatively high proportion of journeys in York are under 5km (56% compared to 40% in England as a whole). For commuting trips, travel by car is the dominant mode although use of the car for commuting within York (53% mode split) is lower than for England and Wales (63%), and significantly lower than for inward commuters (81%).
- 4.11.3 York has a higher proportion of people who cycle or walk to work compared to England and Wales and the Yorkshire and the Humber region. In addition, cycling levels have increased significantly since the Cycling City York programme commenced in 2008. The majority of people in York commute less than 10km to work, indicating that they live within or close to the City.
- 4.11.4 Bus patronage has remained roughly static at around 15m passenger trips per year, of which approximately 2.8 million are Park & Ride passengers. However, accessibility (to the City Centre) by public transport varies significantly. Access is generally good along the urban corridors, with services comprising a mixture of high-frequency local bus services and Park & Ride services, serving six Park & Ride sites on the perimeter of the City that can reach the City Centre within 30 minutes. The particular 'accessibility gaps' are principally in the outlying smaller villages, Strensall (which has a high-frequency service but a journey time to the City Centre of more than 30 minutes) and parts of the north western sector of the York urban area. Villages on the main interurban bus routes have better access to the City Centre than those not on these routes. Vehicle ownership levels are significantly higher in rural areas and in some cases are more than double that for urban wards.
- 4.11.5 York is well connected by rail to many other areas of the country. York is the second busiest station in Yorkshire and Humber (after Leeds).
- 4.11.6 With regards to road safety, the baseline for 2010-14 is that on average, 4 people were killed and 58 seriously injured on the roads each year. In 2015 there were 2 fatalities (50% below the baseline) and 72 seriously injured (24.6% above the baseline).⁵⁷ Between 2010 and 2014, the baseline average number of children killed or seriously injured stood at 3. In 2015, 6 children were killed or seriously injured representing a 100% increase in comparison to the baseline average.

Likely Evolution without the Plan

- 4.11.7 The City currently has six Park & Ride services and a central railway station with frequent trains accessing the region and beyond. The proportion of people choosing to cycle or walk is higher than the national average due to the flat topography of the City (making it easy for people to use this mode of transport) and as a result of improvements to associated infrastructure through funding and promotional schemes. It would therefore be reasonable to anticipate that a

⁵⁷ North Yorkshire County Council (2016) Reported Road Casualties in North Yorkshire: Summary Results 2015 <http://www.roadwise.co.uk/wp-content/uploads/2015/06/2015-Main-Summary-Results-FINAL.pdf> [accessed July 2017]

continuation of the current situation is likely in terms of bus travel, access to trains and cycling and walking access. However, evidence suggests that car ownership is growing and with this there may be an equivalent increase in traffic that may have negative effects, particularly at peak hours where certain roads are known to be at capacity.

- 4.11.8 Transport planning under the Local Transport Plan 3 2011-2031 sets the framework for improvements to the network based upon need, some of which would be delivered through the Local Plan and the rest independently of planning policy. Planning policy would certainly support and help to deliver the aspirations set out in the Local Transport Plan.
- 4.11.9 A policy-off scenario would particularly leave a gap in determining the location of development and thus support for integrated infrastructure systems and transport networks, which would minimise the use of the car and support sustainable travel modes. Co-location of development with sustainable transport is paramount and without policy intervention this may not be achieved, negatively affecting the City's ambition to become a more sustainable and environmentally friendly city. Whilst behavioural change and education can go so far in influencing the population, planning policy and the location of development could dramatically support sustainable development through its location, helping to minimise any impact of new development on the existing infrastructure. Furthermore, the City aspires to become the first low emission city which may not be delivered to its full potential without delivery mechanisms and requirements set out in planning policy.
- 4.11.10 Interrelated to transport is ensuring people can live and work within the City to minimise commuting and additional trips to work and services. Currently, the City supports a net inward commute to work which is thought to be exacerbated due to the affordability of living within the authority. This imbalance impacts on the road network particularly at peak time and is not likely to be rectified without policy intervention and a balance between housing and economic growth, factoring in infrastructure improvements.

Key Sustainability Issues

- ▶ York experiences a net daily in-commute of approximately 4,283 trips from the Yorkshire and Humber Region (Census 2011);
- ▶ The number of people cycling has increased since the introduction of the Cycling City York programme;
- ▶ High frequency bus services match well to the areas in York with the highest number of households without a car;
- ▶ Vehicle ownership levels are significantly higher in rural areas of York;
- ▶ York is well connected by rail to many other areas of the country, but services to Harrogate are of a low frequency and rail links to the south east of the City including Hull are relatively poor ;
- ▶ The number of killed and seriously injured road casualties increased in 2015 (from the 2010/14 average);

4.12 Resources, Energy and Waste

Resources

- 4.12.1 York's ecological footprint was identified as 4.72 global hectares (gha) per person in 2009⁵⁸ which is just over the UK average of 4.64 gha per person. York's footprint decreased from that in 2001 and 2006 when the footprint was 6.3 gha and 5.38 gha per person respectively. The City of York Community Strategy (Without Walls) sets a target for the progressive reduction of York's ecological footprint to 3.5 gha per person by 2033.

⁵⁸ Taken from the results released in October 2009 by the Stockholm Environment Institute

- 4.12.2 Yorkshire Water promotes water efficiency to safeguard water resources. The average person uses 65,000 litres of water per year or 180 litres per day⁵⁹. As people own more appliances which use water, water efficiency is paramount to ensuring that water resources are available in the future.
- 4.12.3 Water for York is abstracted from the River Ouse and River Derwent. Increased development and population growth will lead to further water resource abstraction, which may impact on the two rivers.
- 4.12.4 The growth in local population is expected to increase the demand on water resources, which has the potential for a negative effect on water resource availability. Yorkshire Water's Water Resources Management Plan 2014⁶⁰ has considered 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. York lies within the Grid SWZ zone within Yorkshire Water's area, which identifies a deficit between supply and demand from 2018/19 of 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 management plan (to be adopted in 2019).
- 4.12.5 Customer water efficiency measures which could be incorporated into 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 water consumption, however the uptake of these measures is not yet known.

Energy

- 4.12.6 The average domestic consumption of electricity and gas has been decreased between 2005 (gas: 1,413.9 Gwh and electricity: 356.5 GWh) and 2014 (gas: 1,070.1 GWh electricity: 322.8 GWh) with York in line with the national trends⁶¹. Similarly, trends in the consumption for commercial and industrial gas and electricity also show a decrease. The Council has been promoting energy efficiency through campaigns and schemes to help householders reduce their consumption and become more energy efficient. This has proved successful in targeted locations.

Waste

- 4.12.7 The City of York has a positive decreasing trend in respect of tonnes of waste produced. There has been a significant increase in the amount of recycling that has occurred with the vast majority of residents having a kerbside recycling collection service. In 2015/16 around 41% of Local Authority collected waste in the City was recycled⁶². For municipal waste City of York Council works closely with North Yorkshire County Council through an Inter-Authority Agreement. Future waste management issues are being considered through the new Minerals and Waste Joint Plan.

Likely Evolution without the Plan

- 4.12.8 Water for York is abstracted from the River Ouse and River Derwent. Increased development and population growth will lead to further water resource abstraction. Yorkshire Water's Water Resources Management Plan 2014 has considered the demand and supply of water for the forthcoming 25 years. Water supply will be managed through a series of demand reduction

⁵⁹ Yorkshire Water (2014) Yorkshire Water's Water Resources Management Plan

⁶⁰ Yorkshire Water (2014) Yorkshire Water's Water Resources Management Plan

⁶¹ Total final energy consumption at regional and local authority level. Available via: <https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2010> [accessed July 2017]

⁶² Waste and recycling statistics <https://www.gov.uk/government/collections/waste-and-recycling-statistics> [accessed July 2017]

initiatives, water efficiency measures, leakage reduction and development of new and existing assets including additional sustainable abstraction.

- 4.12.9 Legislation, publicity and education have been focussed on ensuring that the message to reduce, re-use and recycle to minimise waste, the use of materials and overall consumption is implemented through appropriate schemes and adopted through behavioural change. Trends in York are in line with this with the amount of waste recycled increasing and the amount landfilled decreasing.
- 4.12.10 Energy consumption in York decreased between 2005 and 2014 and the City's consumption is now consistently below the national average. As recycling schemes and energy efficient measures continue to be implemented, it is reasonable to assume that these trends will continue.
- 4.12.11 The compulsory quality of development and requirements for the generation of renewable energy and use of materials in response to climate change and efficiency across York in the future will largely be dependent upon national guidance and Building Regulations. Any changes to this guidance should be reflected in new development. Currently, the Building Regulations set out the criteria for the quality of development and requirements for sustainability, including renewable energy generation. Furthermore, non-compulsory guidance from BREEAM for commercial premises sets out measures for sustainability. This guidance is not statutory, however, and would be given more support should it, or the equivalent, be included within planning policy as a requirement.

Key Sustainability Issues

- ▶ York has reduced its overall consumption of energy resources over the past few years and this trend is likely to continue;
- ▶ A key consumer of resources is transport;
- ▶ External factors such as the weather are likely to continue to impact on consumption;
- ▶ The Council is committed to resource and carbon reduction through energy efficiency;
- ▶ Water resources are not likely to have a significant effect on York as the household consumption has been built into Yorkshire Water's demand/supply models for the period out to 2039/40. Water efficiency improvements by existing and future households and commercial operations are still required;
- ▶ The amount of waste produced in York is reducing whilst the levels of recycling and composting have increased in line with a decrease in landfill.

4.13 Landscape and Heritage

Landscape

- 4.13.1 The setting of York is characterised by open approaches leading towards the City. Long views are achieved across the relatively flat landscape with only occasional woods to interrupt extensive views. The series of green wedges in the City enable long views to be experienced from the outskirts of the City towards important landmarks such as York Minster. The ring-road around York also allows an appreciation for the size and scale of the City as the flat approaches make possible long-distance views across the landscape towards York Minster. York Minster is a dominant feature within the City and views of this building are widely held to be very important in defining the special character of York and its setting. The open approaches enable the City to be experienced within its wider setting, establishing a close relationship between the urban area, green wedges, surrounding countryside and the villages.
- 4.13.2 The landscape of York is broadly characterised as relatively flat and low lying agricultural land dominated by the wide flood plain of the River Ouse, rising slightly to the east and surrounded by a relatively evenly spaced pattern of villages. Specifically, the historic central city of York is

recognised as important in the Natural England's National Character Assessment (NCA)⁶³ as follows:

- ▶ The City of York sits at the centre of the NCA with roads radiating out from it as spokes on a wheel. There has been a history of settlement here, which brings in a high number of tourists to the area.
- ▶ York Minster forms a prominent landmark and focal point for the Vale and visitors to the area.
- ▶ There is development pressure around the City that could lead to development sprawl that takes away from the enclosed dominance of the town centre.

4.13.3 On a national scale, York's landscape is considered generally not to be of a particularly high quality. Nonetheless, it does include a range of features of natural, historical, and cultural significance that contribute to the special qualities of the local landscape. This landscape also serves a substantial population, thus placing great importance on the amenity that it affords. The landscape provides the City and its outlying villages with a rural setting and a direct access to the countryside, and thus has a value/status that reaches beyond the relative quality of the aesthetic landscape.

Heritage

4.13.4 The historic environment of the City of York is of international, national, regional and local significance. York's wealth of historic assets include⁶⁴:

- ▶ York Minster, England's largest (surviving) medieval church and the largest Gothic Cathedral in Northern Europe;
- ▶ 1,599 listed building entries of which 71 are Grade 1 and 173 Grade II*. Some of these entries comprise multiple buildings (for example where terraced properties are included in one listing) and altogether there are well over 2,000 individual listed buildings in York;
- ▶ 22 scheduled monuments in the City 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;
- ▶ 35 designated conservation areas, each of which is covered by a Conservation Area Appraisal and have extra controls applied to them so that the character of the area can be preserved and enhanced.

4.13.5 The City of York Heritage Topic Paper (September 2014)⁶⁵ states that the historic city is an urban site, continuously occupied for almost 2,000 years. It is characterised by a tightly knit, compact core defined by the City Walls, the visual and physical presence of York Minster, the historic street pattern, tenement plot boundaries, and the Rivers Foss and Ouse. Beyond the historic core, the character is further defined by ancient arterial roads and commons (the green wedges formed by the Strays), the river valleys, and the pattern of villages set within a predominantly flat landscape of pasture, arable, woodland and wetland.

4.13.6 The City of York is one of only five historic centres in England that has been designated as an Area of Archaeological Importance under the Ancient Monuments and Archaeological Areas Act 1979 (the historic city centres of Canterbury, Chester, Exeter and Hereford are the others). It is widely acknowledged that many of the deposits are as yet undiscovered and will only become apparent in

⁶³ Natural England (2014) National Character Areas Profile – Vale of York. Available via: <http://publications.naturalengland.org.uk/publication/3488888> [accessed July 2017]

⁶⁴ Historic England - National Heritage List for England. Available via: England <https://historicengland.org.uk/listing/the-list/> [accessed July 2017]

⁶⁵ City of York Council (2014) Heritage Topic Paper Update. Available via: https://www.york.gov.uk/downloads/file/2089/heritage_topic_paper_-_update_september_2014pdf [accessed July 2017]

the urban area through redevelopment of sites and in rural areas through agricultural practice and any new development.

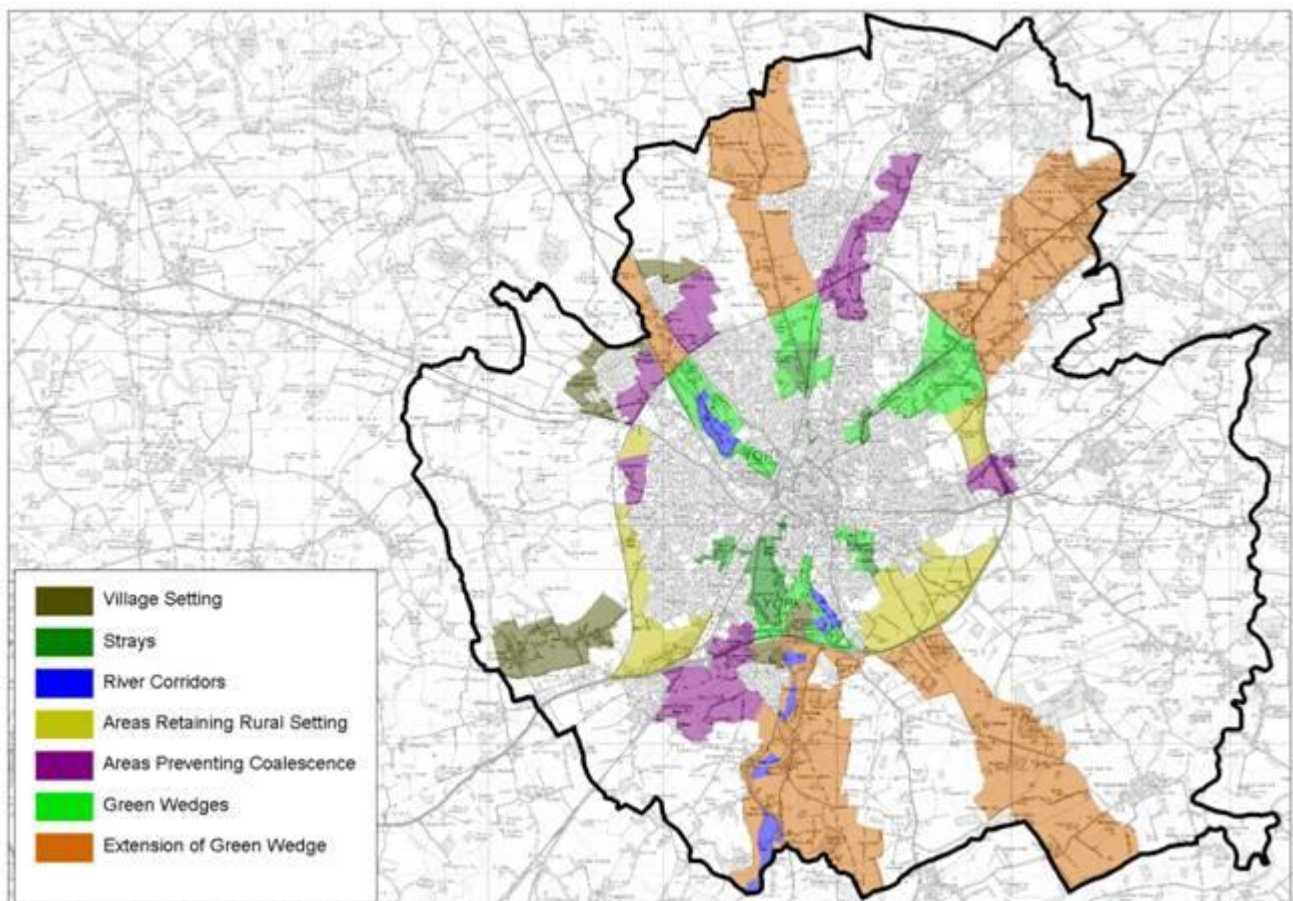
4.13.7 The Central Historic Core Conservation Area Appraisal (2012) was undertaken to enable an understanding of the character of the historic core and how to manage it in the future. This identified 24 character areas and their special qualities as well as their vulnerabilities and opportunities for enhancing their appearance and character.

4.13.8 English Heritage's at Risk Register⁶⁶ includes five assets within York:

- ▶ 1 Conservation Area (The Nestle/Rowntree Factory);
- ▶ 1 Grade I listed building (Church of St Denys, Walmgate, York);
- ▶ 1 Grade II* listed building (Church of St Mary, Jackson's Walk, Askham Richard); and
- ▶ 2 Grade II listed buildings (Church of St Thomas, Lowther Street, York and Church of St Paul, Holgate Road, York)

4.13.9 A review of the Green Belt (2003, updated 2011) identified areas of York important to the historic character and setting of the City. These character areas are set out in **Figure 4.12**.

Figure 4.12 Historic Character and Setting



Likely Evolution without the Plan

4.13.10 York's historic environment is a key defining feature of the City. Its character derives not only from its designated assets, such as listed buildings, scheduled monuments and conservation areas, but

⁶⁶ Historic England - Heritage At Risk Register. Available via: England <https://historicengland.org.uk/advice/heritage-at-risk/search-register/> [accessed July 2017]

also its non-designated assets, including its below ground archaeological deposits. York's historic city centre has also been designated as an area of archaeological importance (one of only five in the country). Whilst it is reasonable to assume that the majority of the designated heritage assets will remain since works to them invariably require consent, elements which contribute to their significance could be harmed through inappropriate development in their vicinity.

- 4.13.11 The Heritage Topic Paper (2014) identified those key attributes which contribute to the special historic character and setting of York. Whilst the formally designated sites may afford some statutory protection through the planning system, other non-designated elements which contribute to the character of the historic city could be harmed without a clear policy framework. Pressures from development in terms of density or building height in various locations could compromise unique features in York. Whilst design can be subjective, without the necessary policy or in a 'policy-off' scenario, there could be significant detrimental impact on the overall historic built environment and its setting.

Key Sustainability Issues

- ▶ York's landscape is a primary feature of York's historic character and setting (see **Figure 4.12**);
- ▶ There are specific elements of the landscape that need to be preserved in order to appreciate the whole of York's context;
- ▶ Views from and to the landscape and built environment features are an important feature of York's character;
- ▶ Historic character and setting is an integral part of the city's past and future;
- ▶ The attractive and unique historic environment contributes to/influences the economy, social and environmental functioning of the city of York;
- ▶ Appreciating the value of heritage assets is key to preservation and enhancement as well understanding any future impacts;
- ▶ Consideration needs to be given to the key views and assets which are identified to have a positive experience for the City.
- ▶ There is a need to tackle heritage assets at risk.

4.14 Geology and Soils

Geology

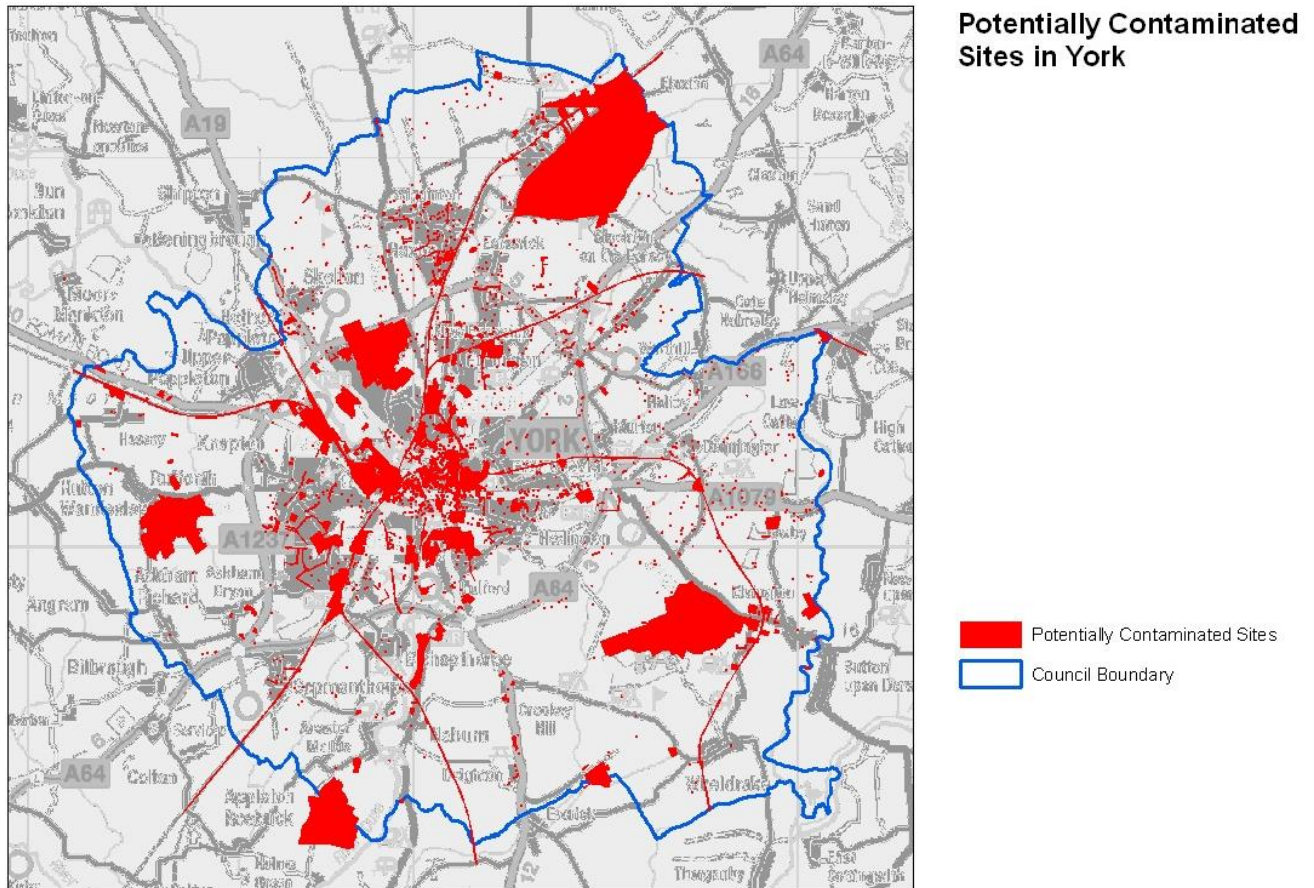
- 4.14.1 The Vale of York has good quality agricultural soils with just over half of the area being classified as grade 2 and almost a quarter as grade 3 agricultural land. Most of the highest quality agricultural land (grade 2) is found in the south west and scattered across the northern half of the NCA⁶⁷. The slowly permeable, seasonally wet and slightly acid but base-rich loamy and clayey soils (37% of the NCA) may suffer compaction and/ or capping as they are easily damaged when wet. In turn, this may lead to increasingly poor water infiltration and diffuse pollution as a result of surface water run-off.
- 4.14.2 Within York, the local bedrock is Sherwood Sandstone. This is designated as a Principal Aquifer and it supports a large number of water abstractions for domestic, agricultural and industrial uses. The superficial geological deposits within York range from sands and gravels to silts and clays, and are either designated as secondary aquifers or unproductive strata.

⁶⁷ Natural England (2014) National Character Areas Profile – Vale of York. Available via: <http://publications.naturalengland.org.uk/publication/3488888> [accessed July 2017]

Contamination

- 4.14.3 The Council published its first Contaminated Land Strategy in 2001, to outline its strategic approach for carrying out its statutory inspection duties and for securing remedial action. The Strategy has subsequently been updated three times (2005, 2010 and 2016). At 2016, the Council identified 3,690 potentially contaminated sites within the City (see **Figure 4.13**). All of the potentially contaminated sites have a past industrial use or have been used for waste disposal activities.

Figure 4.13 Potentially Contaminated Sites in York



Topographic Map: Ordnance Survey © Crown Copyright. All rights reserved City of York Council Licence No. LA 10020818

Likely Evolution without the Plan

- 4.14.4 The majority of agricultural land in York is of good quality. This land is therefore a valuable resource for farming although the quality of farmland is vulnerable to flood events and changes to nutrient levels. Planning policy influencing flood risk and location of development may have an indirect effect on this. A 'policy off' scenario could lead to impacts on land either through loss to development or changing patterns of flooding which leaves silt/nutrients on the land.
- 4.14.5 Within the City there exists a number of locations which are contaminated either due to an historic or current use. Legislation is in place to ensure that appropriate mitigation ensues on parcels of land which are to be developed or pose risk to human health. It is reasonable to assume therefore that this national legislation would govern the need for York to contain/mitigate land in the future.

Key Sustainability Issues

- ▶ Agricultural land in York is predominantly of good quality and therefore valuable for farming;

- ▶ There are contaminated land sites across the City which would require remediation should they be taken forward for development;
- ▶ There are crossovers between land contamination with natural resources and people’s health and well-being.

4.15 Key Sustainability Issues

4.15.1 From the baseline analysis and review of plans and programmes, a number of key sustainability issues have been identified. These are presented in **Table 4.7**, structured according to the SEA Directive Annex I (f) topics.

Table 4.7 Key Sustainability Issues

SEA Topic	SA Theme	Key Sustainability Issues
Population	Population and Households, Economy, Deprivation and Equality, Community Safety	<p>Population and Households</p> <ul style="list-style-type: none"> ▶ York’s population and household numbers are projected to increase; ▶ York has a high need for housing (including affordable housing) which needs to be addressed; ▶ Housing delivery, which has increased significantly in the last two monitoring years, must be maintained; ▶ There is a need to plan for a mix and type of accommodation to suit all household types recognising the SHMA and local evidence of need. <p>Deprivation and Equality</p> <ul style="list-style-type: none"> ▶ York has generally become less deprived (based on IMD indicators) but still has pockets of high deprivation which need to be addressed; ▶ Demand for affordable homes is high; ▶ York has areas which feature within the top 20% most deprived in the country in terms of barriers to housing, although the number has decreased between 2004 and 2015; ▶ A major barrier to housing is the disparity between the cost of housing and how much people earn as well as access to funding such as mortgages. Average house prices are higher in the City than England as a whole; ▶ The provision of other types of homes for the elderly, including nursing homes, residential care homes and warden assisted living as well as support services will also need to be developed; ▶ There is a recognised need for Gypsy and Traveller and Showpeople sites. <p>Community Safety</p> <ul style="list-style-type: none"> ▶ People generally think York is a safe place to live; ▶ Crime rates are decreasing; ▶ Support for the future should be aimed at helping to meet the objectives and identified priorities set out in the Community Safety Plan. <p>Economy</p> <ul style="list-style-type: none"> ▶ A key challenge is to achieve economic growth which reflects the vision for the City in a sustainable manner; ensuring growth protects the environment whilst allowing social and economic progress that recognises the needs of all people; ▶ The number of those seeking out of work benefits is lower than the region and nationally with the percentage of 16-64 year olds considered economically active higher. This needs to be sustained; ▶ York has a highly skilled labour force which has had a positive influence on the City’s economic stability and employment rates; ▶ The relative dependence on public sector employment is decreasing with the increase in private sector business and employment;

SEA Topic	SA Theme	Key Sustainability Issues
		<ul style="list-style-type: none"> ▶ The number of vacant shops in the City Centre is decreasing and the vacancy rate is below the national average although football declined at the start of the decade; ▶ The authority has a duty to provide and support education for all for the development of skills and learning; ▶ The results attained at primary, secondary, further and higher education levels are good and need to be maintained.
Human Health	Health, Air Quality, Water, Flooding and Flood Risk	<ul style="list-style-type: none"> ▶ The general health of citizens in York is good; ▶ The main priorities to address are obesity, particularly in children, alcohol and physical activity.
Biodiversity, Fauna, Flora	Green Infrastructure and Biodiversity	<ul style="list-style-type: none"> ▶ Whilst open space in York includes approximately 480 hectares of parks and open spaces, it is not distributed in a uniform manner across the City and therefore some areas are deficient in certain types of open space; ▶ The quality of large parks and gardens in York is good with five designated as Green Flag Award Status; ▶ York has an abundance of important sites for nature conservation at international, national, regional and local levels; ▶ The City's nature conservation sites support a diverse range of flora and fauna; ▶ Initiatives are ongoing to support nature conservation/open spaces around the City.
Soil	Geology and Soils	<ul style="list-style-type: none"> ▶ Agricultural land in York is predominantly of good quality and therefore valuable for farming; ▶ There are contaminated land sites across the City which would require remediation should they be taken forward for development; ▶ There are crossovers between land contamination with natural resources and people's health and well-being.
Water	Water, Flooding and Flood Risk, Resources, Energy and Waste	<ul style="list-style-type: none"> ▶ York has a history particularly of fluvial flooding. However, all sources of flooding e.g. pluvial and groundwater flooding need to be taken into consideration in planning for the future of the City; ▶ Flooding is still likely to affect people and businesses in York; ▶ There is a need to minimise future flood risk arising from the impacts of climate change; ▶ Water quality is generally good or moderate with the main reasons for poor quality linked with agricultural farming practices. ▶ Protection of the important underlying geological integrity of the Sherwood Sandstone (which is a Principal Aquifer).
Air	Air Quality, Climate Change, Transport	<ul style="list-style-type: none"> ▶ York's air quality continues to decline in the City Centre although there are improvements in other areas (the Salisbury Terrace AQMA may be revoked); ▶ A combination of measures is needed in order to improve air quality including a modal shift in transport and moving to low emission technologies with supporting infrastructure; ▶ York's ambition is to become the first low emission city.
Climatic Factors	Climate Change, Air Quality, Water, Flooding and Flood Risk, Resources, Energy and Waste, Transport	<p>Climate Change</p> <ul style="list-style-type: none"> ▶ Climate change will have an impact in York at a variety of levels (see above); ▶ Targeted campaigns can work including those aimed at design and sustainability as well as lifestyle changes. ▶ There is a need to ensure that new development is adaptable to the effects of climate change; ▶ There is a need to mitigate climate change including through increased renewable energy and low carbon energy generation. <p>Transport</p> <ul style="list-style-type: none"> ▶ York experiences a net daily in-commute of approximately 4,283 trips from the Yorkshire and Humber Region (Census 2011);

SEA Topic	SA Theme	Key Sustainability Issues
		<ul style="list-style-type: none"> ▶ The number of people cycling has increased since the introduction of the Cycling City York programme; ▶ High frequency bus services match well to the areas in York with the highest number of households without a car; ▶ Vehicle ownership levels are significantly higher in rural areas of York; ▶ York is well connected by rail to many other areas of the country, but services to Harrogate are of a low frequency and rail links to the south east of the City including Hull are relatively poor; ▶ The number of killed and seriously injured road casualties increased in 2015 (from the 2010/14 average).
Material Assets	Resources, Energy and Waste	<ul style="list-style-type: none"> ▶ York has reduced its overall consumption of energy resources over the past few years and this trend is likely to continue; ▶ A key consumer of resources is transport; ▶ External factors such as the weather are likely to continue to impact on consumption; ▶ The Council is committed to resource and carbon reduction through energy efficiency; ▶ Water resources are not likely to have a significant effect on York as the household consumption has been built into Yorkshire Water's demand/supply models for the period out to 2039/40. Water efficiency improvements by existing and future households and commercial operations are still required; ▶ The amount of waste produced in York is reducing whilst the levels of recycling and composting have increased in line with a decrease in landfill.
Cultural Heritage including architectural and archaeological	Landscape and Heritage	<ul style="list-style-type: none"> ▶ Historic character and setting is an integral part of the city's past and future; ▶ The attractive and unique historic environment contributes to/influences the economy, social and environmental functioning of the city of York; ▶ Appreciating the value of heritage assets is key to preservation and enhancement as well understanding any future impacts; ▶ Consideration needs to be given to the key views and assets which are identified to have a positive experience for the City. ▶ There is a need to tackle heritage assets at risk.
Landscape	Landscape and Heritage	<ul style="list-style-type: none"> ▶ York's landscape is a primary feature of York's historic character and setting; ▶ There are specific elements of the landscape that need to be preserved in order to appreciate the whole of York's context; ▶ Views from and to the landscape and built environment features are an important feature of York's character.

5. SA Approach

5.1 Introduction

- 5.1.1 This section describes the approach to the SA of the Local Plan Publication Draft. In particular, it sets out the appraisal framework (the SA Framework) and how this has been used to appraise the key components of the Local Plan Publication Draft.

5.2 SA Framework

- 5.2.1 The SA Framework comprises sustainability objectives and guide questions to inform the appraisal. Establishing appropriate SA objectives and guide questions is central to appraising the sustainability effects of the Local Plan for the City of York. Broadly, the SA objectives define the long term aspirations for the City with regard to social, economic and environmental considerations and it is against these objectives that the performance of the Local Plan Publication Draft (and reasonable alternatives) has been appraised.
- 5.2.2 **Table 5.1** presents the SA Framework including SA objectives and associated guide questions. The SA objectives and guide questions reflect the analysis of the key objectives and policies arising from the review of plans and programmes (**Section 3**), the key sustainability issues identified through the analysis of York's socio-economic and environmental baseline conditions (**Section 4**) and comments received during consultation on the Scoping Report. The SEA Directive topic(s) to which each of the SA objectives relates is included in the third column.

Table 5.1 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"> • Deliver homes to meet the needs of the population in terms of quantity, quality • Promote improvements to the existing and future housing stock • Locate sites in areas of known housing need • Deliver community facilities for the needs of the population • Deliver pitches required for Gypsies and Travellers and Showpeople 	Population
2. Improve the health and wellbeing of York's population	<ul style="list-style-type: none"> • Avoid locating development where environmental circumstances could negatively impact on people's health • Improve access to open space / multi-functional open space • Promotes a healthier lifestyle through access to leisure opportunities (walking /cycling) • Improves access to healthcare • Provides or promotes safety and security for residents • Ensure that land contamination/pollution does not pose unacceptable risks to health 	Population, Human Health
3. Improve education, skills development and training for an effective workforce	<ul style="list-style-type: none"> • Provide good education and training opportunities for all • Support existing higher and further educational establishments for continued success • Provide good quality employment opportunities available to all 	Population
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	<ul style="list-style-type: none"> • Help deliver conditions for business success and investment • Deliver a flexible and relevant workforce for the future • Deliver and promote stable economic growth 	Population

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
	<ul style="list-style-type: none"> Enhance the city centre and its opportunities for business and leisure Provide the appropriate infrastructure for economic growth Support existing employment drivers Promote a low carbon economy 	
5. Help deliver equality and access to all	<ul style="list-style-type: none"> Address existing imbalances of equality, deprivation and exclusion across the city Provide accessible services and facilities for the local population Provide affordable housing to meet demand Help reduce homelessness Promote the safety and security for people and/or property 	Population, Human Health
6. Reduce the need to travel and deliver a sustainable integrated transport network	<ul style="list-style-type: none"> Deliver development where it is accessible by public transport, walking and cycling to minimise the use of the car Deliver transport infrastructure which supports sustainable travel options Promote sustainable forms of travel Improve congestion 	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"> Reduce or mitigate greenhouse gas emissions from all sources Plan or implement adaptation measures for the likely effects of climate change Provide and develop energy from renewable, low and zero carbon technologies Promote sustainable design and building materials that manage the future risks and consequences of climate change Adhere to the principles of the energy hierarchy 	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"> Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs Protect and enhance locally important nature conservation sites (SINCs) Create new areas or site of bio-diversity / geodiversity value Improve connectivity of green infrastructure and the natural environment Provide opportunities for people to access the natural environment 	Biodiversity, Flora & Fauna, Human Health
9. Use land resources efficiently and safeguard their quality	<ul style="list-style-type: none"> Re-use previously developed land Prevent pollution contaminating the land and remediate any existing contamination Safeguard soil quality, including the best and most versatile agricultural land Protect or enhance allotments Safeguard mineral resources and encourage their efficient use 	Soil, Material Assets
10. Improve water efficiency and quality	<ul style="list-style-type: none"> Conserve water resources and quality; Improve the quality of rivers and groundwaters 	Water
11. Reduce waste generation and increase level of reuse and recycling	<ul style="list-style-type: none"> Promote reduction, re-use, recovery and recycling of waste Promote and increase resource efficiency 	Material Assets
12. Improve air quality	<ul style="list-style-type: none"> Reduce all emissions to air from current activities Minimise and mitigate emissions to air from new development (including reducing transport emissions through low emission technologies and fuels) Support the development of city wide low emission infrastructure; 	Air, Human Health

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
	<ul style="list-style-type: none"> Improve air quality in AQMAs and prevent new designations; Avoid locating development where it could negatively impact on air quality Avoid locating development in areas of existing poor air quality where it could result in negative impacts on the health of future occupants/users Promote sustainable and integrated transport network to minimise the use of the car 	
13. Minimise flood risk and reduce the impact of flooding to people and property in York	<ul style="list-style-type: none"> Reduce risk of flooding Ensure development location and design does not negatively impact on flood risk Deliver or incorporate through design sustainable urban drainage systems (SUDs) 	Climatic Factors, Water
14. Conserve or enhance York's historic environment, cultural heritage, character and setting	<ul style="list-style-type: none"> Preserve or enhance the special character and setting of the historic city Promote or enhance local culture Preserve or enhance designated and non-designated heritage assets and their setting Preserve or enhance those elements which contribute to the 6 Principle Characteristics of the City as identified in the Heritage Topic Paper 	Cultural Heritage, Landscape
15. Protect and enhance York's natural and built landscape	<ul style="list-style-type: none"> Preserve or enhance the landscape including areas of landscape value Protect or enhance geologically important sites; 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 	Cultural Heritage, Landscape

5.2.3 **Table 5.2** shows the extent to which the SA objectives encompass the range of issues identified in the SEA Directive.

Table 5.2 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.

5.3 Appraising the Local Plan Publication Draft Vision and Outcomes

5.3.1 The Local Plan Publication Draft vision and plan outcomes are reproduced in **Section 1.2** of this report. It is important that the vision and outcomes are aligned with the SA objectives (see ODPM guidance⁶⁸ Task B1). This has been tested by assessing the relationship between the SA objectives and the draft Local Plan vision and outcomes.

5.3.2 The vision and the four plan outcomes have been assessed for their compatibility against each of the 15 SA objectives (presented in **Table 4.1**). The following scoring system has been used to determine their compatibility:

+	Compatible	?	Uncertain
0	Neutral	-	Incompatible

5.3.3 The findings of the compatibility assessment of the vision and plan outcomes and SA objectives are shown in **Table 6.1**. The findings are summarised in **Section 6.2**.

5.4 Appraising the Draft Key Development Principles

5.4.1 As detailed in **Section 1.2**, alongside the vision and plan outcomes Chapter 2 of the draft Local Plan also sets out the key development principles for York through four policies. The appraisal of these policies has been undertaken against each of the SA objectives using an appraisal matrix. The following information was recorded in the matrix in order to present the findings of the SA:

- ▶ The SA objectives and criteria;
- ▶ A score indicating the nature of the effect for each individual policy and for the cumulative effect of all policies;
- ▶ A commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
- ▶ Recommendations as to how the proposed policies may be improved against the SA objectives, including any mitigation or enhancements measures.

The qualitative scoring system used to assess the effects of the policies is shown in **Table 5.3** below.

Table 5.3 Scoring System Used in the SA of Key Development Principles Policies

Symbol	Likely Effect on the SA Objective
++	The policy is likely to have a significant positive effect on the SA objective.
+	The policy is likely to have a positive effect on the SA objective.
0	No significant effect / no clear link between the policy and the SA objective.
I	Depends upon Policy Implementation (applied to GIS Assessments)

⁶⁸ ODPM (November 2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents: Guidance for Regional Planning Bodies and Local Planning Authorities*.

Symbol	Likely Effect on the SA Objective
?	Uncertain or insufficient information on which to determine effect on the SA objective.
-	The policy is likely to have a negative effect on the SA objective.
--	The policy is likely to have a significant negative effect on the SA objective.

5.4.2 A summary of the results of the appraisal of Local Plan Publication key development principles is presented in **Section 6.2** of this report. The appraisal matrices are presented at **Appendix E**.

5.5 Appraising the Draft Spatial Strategy

5.5.1 The appraisal of the spatial strategy has been undertaken by appraising those policies concerning the quantum and location of development in Chapter 3 (Spatial Strategy) of the draft Local Plan alongside the strategic sites and smaller (local) allocations. The preferred housing and employment growth figures, which inform the levels of growth identified in the Local Plan Publication Draft spatial strategy, and the reasonable alternatives have also been appraised. The approach to the appraisal of each component of the spatial strategy is summarised below.

Preferred housing and employment growth figures and reasonable alternatives

5.5.2 The preferred housing and employment growth figures and the reasonable alternatives considered by the City of York Council but not taken forward for inclusion in the spatial strategy have been appraised with the same SA scoring approach applied to the key development principles (See **Section 5.4** above). For the preferred options and reasonable alternatives, the presentation of the SA scoring has been tailored to specifically account for effects of the options in the short, medium and long term. This approach follows that undertaken for consideration of the housing figures and employment scenarios considered as part of the SA Technical Report (prepared by Amec Foster Wheeler) presented alongside the report on these figures to the City of York Local Plans Working Group and Executive in July 2017.

5.5.3 The results of the appraisal and the appraisal matrices are presented in **Section 6.3**.

Spatial Strategy Policies

5.5.4 The spatial strategy policies have been appraised using the same approach as that adopted to appraise those policies that set out the key development principles (see **Section 5.4** above). A score has been awarded for each constituent policy and for the cumulative effects of all the policies contained in Chapter 3.

5.5.5 A summary of the results of the appraisal is presented in **Section 6.4** of this report. The appraisal matrices are presented at **Appendix F**.

Strategic Sites and Local Allocations

5.5.6 As set out in **Section 1.2**, the majority of growth over the plan period is to be delivered at strategic sites across the City area. The process of the identification of strategic sites as part of the preparation of the draft Local Plan is described in **Section 2** of this report with further detail in **Appendix K**. An additional 21 housing sites, 6 employment sites, 1 Travelling Showpeople site and 1 student housing site have been identified for allocation. In total some 136 strategic and smaller scale (local) housing sites and 29 employment sites have been considered as part of this SA.























- 5.5.7 Consistent with the approach adopted to the appraisal of sites as part of the SA of the Local Plan Preferred Options, all sites were assessed against the 15 SA objectives using tailored assessment criteria, as shown in **Table 5.4**. The outcome of the assessment is presented at **Appendix H**.
- 5.5.8 Proposed/potential strategic site allocations have also been subject to more detailed assessment against the SA objectives. This reflects their potential importance to the delivery of the spatial strategy, their capacity to generate significant effects and the need to consider in more detail opportunities for the delivery of on-site services and facilities commensurate to the scale of development. Similar to the appraisal of spatial strategy policies, an appraisal matrix was utilised and the following information recorded:
- ▶ The SA objectives and criteria;
 - ▶ A score indicating the nature of the effect for each site by SA objective;
 - ▶ A commentary on significant effects (including consideration of the cumulative, synergistic and indirect effects as well as the geography, temporary/permanence and likelihood of any effects) and on any assumptions or uncertainties; and
 - ▶ Recommendations, including any mitigation or enhancements measures.
- 5.5.9 The appraisal matrix for each strategic site allocation and the reasonable alternatives not taken forward is contained within **Appendix I**. A summary of the appraisal of the proposed strategic site allocations is presented in **Section 6.5**. The detailed assessment of the strategic sites has been undertaken solely by officers of City of York Council.

Table 5.4 Site Assessment Criteria

SA Objective	Relevant Assessment Criteria Indicator	Maximum score		Indicative SA Scoring ⁶⁹	
		Per indicator	Total	Points scored	SA Symbol
1: To meet the diverse housing needs of the population in a sustainable way.	No. of dwellings proposed/estimated	n/a	n/a	100+ 1-99 0	++ + 0
2: Improve the health and well-being of York's population	Access to: • doctors • open space	5 5	10	6-10 3-5 1-2 0	++ + - --
3: Improve education, skills development and training for an effective workforce	(Housing) Access to: • nursery provision • primary schools • secondary schools • higher education facilities	5 5 5 5	20	11 -20 5-10 1-4 0	++ + - --
	(Employment) Access to: • nursery provision	5	5	4-5 1-2 0	++ + -
4: Create jobs and deliver growth of a sustainable and inclusive economy	No. of jobs potentially created	n/a	n/a	100+ 1-99 0	++ + 0
5: Help deliver equality and access to all	Access to: • Non-frequent bus routes • Frequent bus routes • Park and ride bus stops • Railway station by walking • Railway station by cycling • Adopted highways • Cycle routes	3 5 5 5 5 5 5	33 ⁷⁰	Employment score: 18-33 9- 17 1-8 0	++ + --
6: Reduce the need to travel and deliver a sustainable integrated transport network			Housing:	Housing score:	

⁶⁹ Where mixed scores against SA Objectives have been assessed (for example a mix of positive and negative scores), the appraisal scoring above includes both scores. For strategic sites further commentary is provided for the reasoning in the completed site matrices in Appendix I.

⁷⁰ The total scoring applied to Objective 6 was reduced from a maximum score of 38 to reflect the deletion of neighbourhood centres as an indicator. Public rights of way were also removed as an indicator from this objective.

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring ⁶⁹	
	Indicator	Per indicator	Total	Points scored	SA Symbol
	Additional access for Housing sites: <ul style="list-style-type: none"> Supermarket/convenience stores 	5	38	21-38 11-20 1-10 0	   
7: To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	Potential to incorporate/connect to District Heating and Combined Heat and Power Networks	n/a	n/a	10+ dwellings/ 1,000sqm floorspace <10 dwellings/ 1,000sqm floorspace	 0
8: Conserve and enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for high quality and connected natural environment ⁷¹	<ul style="list-style-type: none"> Statutory nature conservation designations (SPA, SCA, SSSI, Ramsar and LNR); Regional Green Infrastructure Corridor; Site of Interest for Nature Conservation (SINC); Area of Local Nature Conservation (LNC) Interest; Ancient Woodland. 	n/a	n/a	Includes/is adjacent to a non-statutory designated site.	
				500m from a ⁷² statutory site 250m from a statutory designated site	 
				No designations affecting site	0
9: Use land resources efficiently and safeguard their quality	<ul style="list-style-type: none"> Brownfield / Greenfield/ Mixed Agricultural Land Classification 	n/a	n/a	Brownfield Mixed BF/GF GF Not Grade 1/2/3 GF and Grade1/ 2/3	   
10: Improve water efficiency and quality	Proximity to waterbodies	n/a	n/a	Within 10m 10 – 30m >30m	  0
	Environment Agency Groundwater Source Protection Zones (SPZ)	n/a	n/a	Zone 1 Zone 2 Zones 3 & 4 Outside SPZ	   0
11: Reduce waste generation and increase level of reuse and recycling	Not applicable at location level assessment				
12: Improve air quality	Air quality management area (AQMA)	n/a	n/a	Within 50m 250m 500m	   0
13: Minimise flood risk and reduce the impact of flooding to people and property in York	Environment Agency Flood Zones	n/a	n/a	Zone 3a Flood Zone 2	  0

⁷¹ In reference to these criteria, 'adjacent' refers to a 10m buffer from a non-statutory site.

⁷² The scoring against SA Objective 8 was amended to reflect potential impacts on Statutory Nature Conservation Sites. Indicators including district green infrastructure and tree preservation orders were removed.

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring ⁶⁹	
	Indicator	Per indicator	Total	Points scored	SA Symbol
				Flood Zone 1	
14: Conserve and enhance York's historic environment, cultural heritage, character and setting	Heritage Impact Appraisal ⁷³	n/a	n/a	Significant Positive Benefit Positive Benefit Minor Harm Serious Harm Neutral	++ + - -- 0
15: Protect and enhance York's natural and built landscape	Heritage Impact Appraisal ⁷⁴	n/a	n/a	Significant Positive Benefit Positive Benefit Minor Harm Serious Harm Neutral	++ + - -- 0

5.6 Appraising the Draft Thematic Policies

- 5.6.1 The appraisal of thematic policies contained in each of the remaining 12 draft Local Plan policy chapters adopted the same approach as that used to appraise the key development principles and spatial strategy policies. A score has been awarded for both each constituent policy and for the cumulative effect of all policies on a chapter-by-chapter basis.
- 5.6.2 The appraisal has been informed by that undertaken and presented in the SA Reports which accompanied the halted Publication Draft Plan in 2014 and the Local Plan Pre-Publication Draft in 2017. **Appendix M** includes two schedules to show how the appraisal has taken account of changes made to the emerging policies between the Publication Draft Plan in 2014 and the Local Plan Pre-Publication Draft in 2017 (Table 2) and between the Local Plan Pre-Publication Draft and the current Publication Draft (Table 1).
- 5.6.3 A summary of the results of the appraisal of the draft Local Plan policies is presented in **Section 6.6** of this report. The appraisal matrices are contained at **Appendix J**.

5.7 Cumulative, Synergistic and Secondary Effects

- 5.7.1 The policies of the Local Plan Publication Draft do not sit in isolation from each other. The policies will work together to achieve the objectives of the Plan. For this reason, it is important to understand what the combined sustainability effects of the policies will be.
- 5.7.2 As noted above, the appraisal of the key development principles, spatial strategy and thematic policies has been undertaken by Local Plan Publication Draft chapter in order to determine the cumulative effects of each policy area. Throughout the policy appraisal matrices, reference is made to where cumulative effects could occur between the policy themes. In addition to the inclusion of cross reference between the policy themes, a cumulative effect assessment has been undertaken in order to clearly identify areas where policies work together. The cumulative assessment matrix is presented in **Table 6.4** and summarised in **Section 6.7**. Additional

⁷³ The scoring against SA Objective 14 has been informed by the evidence contained within the Heritage Impact Appraisal (HIA) and discussions with Council officers, taking into account heritage and landscape designations.

⁷⁴ The scoring against SA Objective 15 has been informed by the findings of the HIA and discussions with Council officers, taking into account landscape designations.

commentary is also provided where the draft Local Plan may have effects in-combination with other plans and programmes. Finally, further consideration of the cumulative effects on localised communities from multiple strategic and local sites within 1km of each other has also been undertaken.

5.8 When the SA was Undertaken and by Whom

- 5.8.1 This SA of the Local Plan Publication Draft was undertaken jointly by City of York Council and Amec Foster Wheeler in winter 2017/18 with the exception of the strategic sites (allocations and reasonable alternatives). The strategic site options were appraised solely by the City of York Council.

5.9 Technical Difficulties, Uncertainties and Assumptions

- 5.9.1 The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. In this respect, a range of assumptions and uncertainties have been identified in the assessment matrices. Those uncertainties and assumptions that cut across the appraisal are outlined below.

Uncertainties

- ▶ The exact composition of future development is uncertain at this stage;
- ▶ The exact characteristics of sites (in terms of, for example, the presence of buried archaeological remains or protected species) is uncertain and will be subject to further, detailed analysis at the project stage;
- ▶ There could be opportunities to improve water efficiency as part of new developments, for example with the development of SUDS. However, any such improvements could only be determined at the detailed planning application stage;
- ▶ There may be opportunities for enhancements to York's historic environment as part of new development. However, this could only be fully determined at the detailed planning application stage;
- ▶ There may be opportunities for enhancements to York's natural and built landscape as part of new development. However, this could only be fully determined at the detailed planning application stage.

Assumptions

- ▶ The overarching assumptions and analysis for growth are predicated on modelling and interpretation of different future economic scenarios. However, the future economic climate is uncertain and depending on how this ensues, it may influence the deliverability and viability of sites;
- ▶ It is assumed that current energy mix will continue (and associated carbon emissions will be largely similarly to current);
- ▶ It is assumed that there will be no new technological leaps that will substantially alter current patterns of movement, or activities or significantly reduce environmental effects;
- ▶ It is assumed that there will be consistent policy implementation;
- ▶ It is assumed that development will be located in areas at lowest risk of flooding, or that development would need to accord with policies on flood risk in the Local Plan Publication Draft in order to mitigate any adverse effects on flooding;

- ▶ The score of ‘No significant effect / no clear link between the policy and the SA objective’ does not always mean that there is no impact/effect predicted on the SA objective. In some cases, the score has been adopted where the positive effects and the negative effects counteract each other, or where the effect does not contribute to, or detract from, the achievement of the objective. For some objectives, such as Biodiversity (SA Objective 8), protected species and habitats issues may emerge at the project stage as further research is completed on sites;
- ▶ Whilst the assessment of cumulative effects of the implementation of the Local Plan Publication Draft and other plans and programmes has been based on the most up to date information available at the time of writing, in many cases there is a lack of detailed information to make robust conclusions.

5.10 Findings of the Habitats Regulations Assessment (HRA) Preliminary Assessment

- 5.10.1 Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’) states that if a land-use plan is “(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and (b) is not directly connected with or necessary to the management of the site” then the plan-making authority must “...make an appropriate assessment of the implications for the site in view of that site’s conservation objectives” before the plan is given effect. The process by which Regulation 105 is met is known as Habitats Regulations Assessment (HRA).
- 5.10.2 As with SA/SEA, it is accepted best-practice for the HRA of strategic planning documents to be run as an iterative process alongside plan development, with the emerging policies or options continually assessed for their possible effects on European sites and modified or abandoned (as necessary) to ensure that the subsequently adopted plan is not likely to result in significant effects on any European sites, either alone or ‘in combination’ with other plans.
- 5.10.3 To inform the development of the emerging local plan, a HRA Preliminary Assessment has been prepared. The preliminary assessment has identified that the focus of the HRA should be restricted to the following European Sites:
- ▶ Humber Estuary (SPA, SAC & Ramsar);
 - ▶ Lower Derwent Valley (SPA, SAC & Ramsar);
 - ▶ River Derwent (SAC);
 - ▶ Skipwith Common (SAC);
 - ▶ Strensall Common (SAC).
- 5.10.4 And that these should be scrutinised in terms of the following potential impacts on/from:
- ▶ The aquatic environment (Strensall Common);
 - ▶ Mobile species (Humber Estuary, Lower Derwent Valley and River Derwent);
 - ▶ Recreational pressure (Lower Derwent Valley, River Derwent, Skipwith Common and Strensall Common); and
 - ▶ Airborne pollution (Lower Derwent Valley, River Derwent, Skipwith Common and Strensall Common).
- 5.10.5 A total of 138 policies and allocations have been subject to the Preliminary Screening process. The HRA has concluded that likely significant effects could be ruled out for 133 policies and these will be excluded from further assessment in the HRA. Policy SS19 and allocations E18 and H59 were found to cause a likely significant effect (LSE) alone across a range of factors on the adjacent Strensall Common. Similarly, because of anticipated increases in recreational pressure, Policy SS18 was found to cause a LSE alone on the Lower Derwent Valley. Finally, even though situated several

kilometres from the Lower Derwent Valley, Policy SS13 was found to cause a LSE on its wintering bird populations that also use land beyond the European site boundary.

- 5.10.6 By modifying Policy SS18, the LSE alone could be avoided. However, at the Pre-Publication Plan stage in the plan preparation process, it was not found possible to mitigate policies SS19, E18, H59 or SS13 and these must be subjected to an appropriate assessment.
- 5.10.7 The HRA process is iterative enabling refinement of the plan during its preparation. Ongoing HRA work has helped to modify the policies for SS13 and SS19 contained in the Publication Plan to ensure that sufficient mitigation is included as far as can currently be identified prior to finalisation of the HRA Report. The final HRA Report will set out the outcomes of this work.

6. Appraisal of the Effects of the Local Plan Publication Draft

6.1 Introduction

6.1.1 This section presents the findings of the appraisal of effects of the Local Plan Publication Draft against the SA Objectives. It assesses the compatibility of the vision and plan outcomes with the SA Objectives (**Section 6.2**) before presenting the summary of the appraisal of effects of the key development principles (**Section 6.3**), preferred housing and employment growth figures and alternatives (**Section 6.4**), spatial strategy and strategic allocations (**Section 6.5**) and thematic policies (**Section 6.6**). Cumulative, synergistic and secondary effects of the Local Plan Publication Draft, both alone and in-combination with other plans and programmes are considered in **Section 6.7**)

6.2 Vision and Outcomes

6.2.1 As set out in **Section 5**, a matrix has been completed to appraise the compatibility of the vision and plan outcomes contained within the Local Plan Publication Draft against the SA objectives. **Table 6.1** presents the results of this appraisal.

Table 6.1 Appraisal of the draft Local Plan Vision and Outcomes

SA Objective	Draft Local Plan Vision	Draft Local Plan Outcomes			
		Protect the Environment	Create a Prosperous City for All	Ensure Efficient and Affordable Transport Links	Provide Good Quality Homes and Opportunities
1. To meet the diverse housing needs of the population in a sustainable way.	+	?	0	0	+
2. Improve the health and wellbeing of York's population	+	+	+	+	+
3. Improve education, skills development and training for an effective workforce	+	?	+	0	+
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	+	?	+	+	+
5. Help deliver equality and access to all	+	0	+	+	+
6. Reduce the need to travel and deliver a sustainable integrated transport network	+	+	+	+	+

SA Objective	Draft Local Plan Vision	Draft Local Plan Outcomes			
		Protect the Environment	Create a Prosperous City for All	Ensure Efficient and Affordable Transport Links	Provide Good Quality Homes and Opportunities
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	+/-	+	-	+	+/-
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	+/?	+	?	0	?
9. Use land resources efficiently and safeguard their quality	+/-	+	-	0	-
10. Improve water efficiency and quality	+/-	+	-	0	-
11. Reduce waste generation and increase level of reuse and recycling	+/-	+	-	0	-
12. Improve air quality	+/-	+	?	+	?
13. Minimise flood risk and reduce the impact of flooding to people and property in York	+/?	+	?	0	?
14. Conserve or enhance York's historic environment, cultural heritage, character and setting	+/?	+	+/?	0	?
15. Protect and enhance York's natural and built landscape	+/?	+	+/?	0	?

Vision

- 6.2.2 The draft Local Plan vision is underpinned by the principles of sustainable development in seeking to “*deliver sustainable patterns and forms of development*” and deliver “*the city's economic, environmental and social objectives*”. This will include “*ensuring that the city's place making and spatial planning policies reflect its heritage and contemporary culture, contributing to the economic and social welfare of the community whilst conserving and enhancing its unique historic, cultural and natural environmental assets*”.
- 6.2.3 Reflecting the emphasis on the delivery of sustainable development, the appraisal presented in **Table 6.1** has shown that the vision is compatible with the majority of the SA objectives. However, whilst the vision aims to deliver sustainable growth, there is the potential for conflicts particularly between those parts of the vision that support economic growth and social objectives and those that relate to the conservation and enhancement of the City's built and natural environment and this is likely to depend on how the vision is realised through draft Local Plan policies. In this respect,

where the relationship between the vision and SA objectives relating to biodiversity, flood risk, cultural heritage and landscape has been assessed as being compatible, a degree of uncertainty has been identified in **Table 6.1**.

- 6.2.4 The potential for both compatibilities and incompatibilities has been identified in respect of those SA objectives relating to climate change, land use, water, waste and air quality. This reflects the fact that, whilst the vision promotes sustainable development, growth will inevitably lead to an increase in resource use, land take, waste generation and emissions to air.
- 6.2.5 Overall, the draft Local Plan vision leaves room for uncertainties, as potential for compatibilities and incompatibilities has been identified. Although the vision aims to deliver “*sustainable patterns and forms of development*”, potential conflicts could arise between growth, resource use and environmental factors. The effects are often highly dependent on whether growth is achieved under consideration of economic, social and environmental sustainability.

Outcomes

- 6.2.6 Broadly, the draft Local Plan outcomes are supportive of the SA objectives and none of the plan has been assessed as being incompatible with all of the SA objectives. Those SA objectives that are particularly well supported by the plan outcomes include SA Objective 2 (Health), SA Objective 4 (Economy), SA Objective 5 (Equality and Accessibility) and SA Objective 6 (Transport). This reflects the emphasis of the outcomes on the promotion of health (including by ensuring that development does not have adverse impacts on health and through the promotion of healthy lifestyles), economic growth and sustainable transport.
- 6.2.7 Draft Local Plan outcomes relating to prosperity, efficient and affordable transport links and providing good quality homes were identified as having a strong positive relationship with the socio-economic SA objectives (SA objectives 1, 2, 3, 4, 5 and 6) in particular. The outcome ‘Protect the Environment’, meanwhile, was considered to be compatible with those SA objectives related to health, transport, resource use, waste, air quality, flood risk, climate change and the conservation and enhancement of the City’s built and natural environments (SA Objectives 1 and 6 to 15).
- 6.2.8 This assessment has identified some areas where possible tensions exist. Where tensions have been identified, this primarily relates to, on the one hand, the aspiration for growth, and on the other, the need to minimise resource use, waste and greenhouse gas emissions. In this respect, the outcomes ‘Create a Prosperous City for All’ and ‘Provide Good Quality Homes and Opportunities’ are likely to lead to increased resource use (including land and water), waste generation and emissions associated with new housing and economic development which may be incompatible with SA objectives relating to climate change, land use, water and waste.
- 6.2.9 There is also the potential for conflicts between the promotion of housing and economic growth and the conservation and enhancement of the City’s built and natural environment, although this is likely to depend on how the outcomes are realised through Local Plan policies. In this respect, the relationship between the outcomes ‘Create a Prosperous City for All’ and ‘Provide Good Quality Homes and Opportunities’ and the SA objectives relating to biodiversity, air quality, flood risk, cultural heritage and landscape has been assessed as being uncertain. Conversely, the outcome ‘Protect the Environment’ has been assessed as having an uncertain relationship with SA Objective 1 (Housing) and SA Objective 4 (Economy) as the protection of the City’s environmental assets could in theory constrain housing and economic growth (although it is noted that the promotion of the City’s heritage assets and the creation of a high quality public realm are seen as key developments of the City’s economic potential).
- 6.2.10 Notwithstanding, the assessment has highlighted that any adverse effects may be mitigated, and tensions between the SA objectives and plan outcomes resolved, if development takes place in accordance with all of the draft Local Plan outcomes and as such an incompatibility or uncertainty is not necessarily an insurmountable issue, but one that may need to be considered in the development and implementation of the policies that comprise the Plan.

6.3 Key Development Principles

- 6.3.1 Chapter 2 of the draft Local Plan includes four policies which detail the key development principles intended to support the delivery of the vision and plan outcomes. The performance of these policies has been tested against the 15 SA objectives. The full findings of the appraisal are presented at **Appendix E**.
- 6.3.2 The policies that contain the key development principles are anticipated to have a positive effect on all of the SA objectives with those effects being significant in respect of health, equality and accessibility, transport, climate change, biodiversity, flood risk, cultural heritage and landscape. This principally reflects the emphasis of the policies on the delivery of sustainable development. Mixed significant positive and mixed negative effects have been assessed in relation to housing, as the policy aspirations relating to meeting housing need within Policy DP1 (York Sub Area) are encapsulated and given weight within policies SS1 and H1 (see **Sections 6.4, 6.5 and 6.6** for further commentary). Policy DP1, for example, sets out that development will ensure that York fulfils its role within both the Leeds City Region and the York, North Yorkshire and East Riding Local Enterprise Partnership (LEP), ensuring that the City is a key economic driver and a retail, service and transport hub. DP1 also seeks to ensure that its housing needs are met within the local authority area whilst at the same time conserving and enhancing the City's historic and natural environment. Policy DP2 (Sustainable Development), meanwhile, effectively defines sustainable development in the context of York and Policy DP3 promotes the development of sustainable communities and together they aim to encourage growth that is balanced with social and environmental considerations. Effects associated the Policy DP4 (Approach to Development Management) have also been largely assessed as positive, reflecting a presumption in favour of sustainable development in accordance with the NPPF.
- 6.3.3 No significant or minor negative effects were identified during the appraisal of the key development principles.
- 6.3.4 Overall, the policies that set out the key development principles for York are fundamental to realising the sustainable development aspirations for the City over the short, medium and longer term. They create a framework for the draft Local Plan which seeks to promote growth in a sustainable manner and which respects the unique characteristics of the City. Their effective implementation will make an important contribution to the future development of York (and the wider region and LEP) whilst protecting and enhancing the City's built and natural environment, facilitating sustainable means of travel with direct benefits on the health of local residents (through improved air quality and opportunities for exercise).

6.4 Housing and Employment Growth Options

- 6.4.1 The preferred housing and employment growth options in the Local Plan Publication Draft (as set out in Policy SS1) have been appraised against the SA objectives in accordance with the approach set out in Section 4. This has included the indicative housing need figure for York, taken from the Government's consultation on a proposed methodology for calculation housing need.
- 6.4.2 The findings of the appraisal are presented in **Appendix N** for each constituent component. This section sets out the appraisal and summarises the likely effects of the preferred growth figures and the identified reasonable alternatives.

Appraisal of housing growth figure and reasonable alternatives

Considered Housing Growth Options

- 6.4.3 For the purposes of the 2017 Pre-Publication Plan SA Report, the preferred housing growth option of 867 dwellings per annum (dpa), as set out in Policy SS1, and the reasonable alternative (SHMA 2017 Update figure of 953) identified by the City of York Council were appraised. These housing figures were presented to the City of York Local Plans Working Group (LPWG) and Executive in July 2017.

- 6.4.4 Immediately prior to the start of the consultation on the Pre-Publication Plan in September 2017, the Government published *Planning for the right homes in the right places: consultation proposals*⁷⁵. The consultation document set out the Government's proposed approach to (inter alia):
- ▶ establishing a standard method for calculating local objectively assessed housing need, including transitional arrangements;
 - ▶ improving how authorities work together in planning to meet housing and other requirements across boundaries, through the preparation of a statement of common ground;
 - ▶ how calculating housing need can help authorities plan for the needs of particular groups and support neighbourhood planning;
- 6.4.5 Alongside the consultation, the Government issued a *Housing Need Consultation Data Table*⁷⁶. This included a housing need figure for the City of York of 1,070 dpa between 2016 and 2026. This figure was based on the 2016 MHCLG household projections (based on 2014 sub-national data) with the application of an affordability adjustment. The Government used Office of National Statistics (ONS) 2016 data regarding the affordability ratio of median house prices to median gross annual workplace-based income (the 2016 ratio used is 8.27) to adjust the baseline and calculate the overall need. The need for an adjustment is determined by whether the workplace-based median house price to median earnings ratio exceeds four, which is considered appropriate as the ratio of mortgage borrowing to earnings. The Government's formula proposes that each 1 per cent increase in the ratio of house prices to earnings above four results in a quarter of a per cent increase in housing need above projected household growth.
- 6.4.6 This is proposed as a standardised adjustment for market signals to apply to all authorities in England. This means that for some areas with greater affordability the proposed approach may lead to lower housing need than currently set out in adopted plans. The figure of 1,070dpa (from 2016 to 2026) for the City of York was derived from the application of the proposed standardised methodology. The Government's proposed methodology is 'forward looking'. The figure sets out housing need for 2016-2026 but does not require any unmet need (shortfall in housing delivery) prior to this period to be included. The figure must be treated with caution as it forms part of the Government's consultation document and is therefore subject to change prior to any formal amendments to Government policy. MHCLG have indicated an intention to publish a revised NPPF, which will include reference to the use of the finalised standard methodology for the calculation of the housing need.
- 6.4.7 The methodology is subject to consultation and no changes have been made to national policy or guidance that seek to ensure or require that Local Authorities implement this approach when preparing the plan. The Government's methodology only applies adjustments with regards to median house prices, rather than a myriad other factors (such as land prices, house prices, rents, affordability, the rate of development and overcrowding) which may have been applied to adjust baseline projections. The approach to the calculation of local need is therefore untested but does indicate a 'direction of travel' for national policy on the subject of housing need. The SEA regulations require that 'reasonable alternatives' are tested. At this stage, the figure for York is indicative and indicates the implication of the current proposals by the Government to apply a standardised methodology in national policy (subject to consultation). It is therefore important that the figure is appraised during preparation of the Local Plan as a potential figure that may be identified. Therefore the following have been appraised in preparation of this SA Report:
- ▶ Preferred housing figure: 867 dwellings per annum (dpa) – MHCLG Baseline based on the July 2016 Household Projections
 - ▶ Reasonable Alternative: 953dpa – GL Hearn recommended figure (SHMA update, 2017). This reflects the demographic starting point of 867 per annum (based upon the July 2016 household

⁷⁵ MHCLG (2017) Planning for the right homes in the right places: consultation proposals. Available via: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf

⁷⁶ MHCLG (2017) Available via: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/644783/Housing_Need_Consultation_Data_Table.xlsx

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 which may include land prices, house prices, rents, affordability, the rate of development and overcrowding.

- ▶ The Government's consultation housing need figure: 1,070dpa – as set out in the *Housing Need Consultation Data Table* published for consultation by MHCLG in September 2017. This includes the latest household projections baseline with an upwards adjustment based on the Government's proposed formula for taking account of housing affordability ratios. The figure for dwellings per annum is for the period 2016-2026.

- 6.4.8 Housing 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 were superseded by the release of the 2016 based Household Projections and the SHMA update (2017). The housing figures appraised for the purpose of this SA Report reflect the reasonable alternatives for the City of York Council area.
- 6.4.9 The appraisal matrix for the preferred housing growth option, the SHMA 2017 Update reasonable alternative and Government's consultation figure is set out in **Appendix N**.

Summary of Preferred Option Appraisal (867dpa)

- 6.4.10 The preferred option of 867 dwellings per annum is based upon the projected household growth using DCLG 2016 subnational projections. 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.
- 6.4.11 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 housing figures which meet the baseline projections suggest that this need may not be adequately met. The latest GL Hearn technical work (SHMA update 2017) also identified that a 'market signals' uplift is required to enable more affordable homes to be built in line with identified need (this approach to identifying housing need is in line Planning Policy Guidance). The preferred housing growth figure does not include an upward adjustment to reflect market signals. In consequence, the preferred housing figure has been appraised as having a minor positive effect on housing (SA Objective 1) in the short and medium term but is considered to have minor negative effects in the long term. It is considered to have minor negative effects in the long term as it is expected 867 dpa is insufficient to meet the objectively assessed housing needs of the City of York population set out in the latest technical evidence produced by GL Hearn (SHMA Update, 2017). The extent to which there is a variance between housing provision and need (and therefore the extent to which negative effects are observed) would be dependent on delivery on the ground during the plan period and requires effective monitoring of housing delivery. The preferred growth figure has therefore been appraised as being less likely to deliver housing requirements in line with national guidance than the SHMA 2017 Update reasonable alternative and Government consultation figure.
- 6.4.12 The preferred option has been appraised as having minor positive effects on education and skills (Objective 3) and jobs and growth (Objective 4). This is the result of stimulating investment in construction and in the longer term that new housing (and associated population increase) would support the viability and vitality of centres and support economic investment. The preferred option has also been assessed as having minor positive effects on access and equality (Objective 5) due to the potential for new housing to improve the viability and vitality of existing services, including retail.
- 6.4.13 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.

- 6.4.14 The preferred housing figure was assessed as having a minor negative effect on improving the health and well-being of York's population (SA Objective 2) arising from short term construction activity as well as the medium and long term effects on air quality from vehicle emissions. It is 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. This is dependent on the location of development.
- 6.4.15 The assessment identified the potential for the preferred housing growth figure to have minor negative effects on 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.
- 6.4.16 Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development and dependent on site specific proposals, 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.
- 6.4.17 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.

No significant negative or positive effects were recorded against the preferred housing option.

Summary of Appraisal of the SHMA 2017 Update Reasonable Alternative (953dpa)

- 6.4.18 The SHMA 2017 Update reasonable alternative (953dpa) 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). The scale of housing associated with the alternative figure would meet housing demand based on the most recent population forecasts and would support the delivery of affordable housing. The demographic starting point for this figure is the Preferred Option figure of 867 dpa (based upon the July 2016 household projections) with the application 'market signals' upwards adjustment in line with the Planning Practice Guidance requirements. The technical work produced by GL Hearn identifies the need for a 10% market signals adjustment (equivalent to 86 dpa) resulting in a figure of 953 dpa. 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. In the long term the effects of the alternative figure are therefore considered to be significantly positive as it fully meets the objective assessment of housing needs.
- 6.4.19 Significant positive effects have also been identified with regard to creating jobs and delivering growth of a sustainable, low carbon and inclusive economy (Objective 4), and helping to deliver equality and accessibility for all (Objective 5) in the long term. This assessment is predicated on

the basis that the level of growth set out in the alternative will generate economic benefits in the short, medium and long term. This assessment is predicated on the basis that the level of growth set out in the alternative 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.

- 6.4.20 The alternative housing figure has been assessed as having similar effects to the Publication Draft preferred option for the remaining objectives. Mixed positive and negative effects were identified in relation to transport (Objective 6) whilst minor negative effects were identified for climate change (Objective 7), water (Objective 10), waste and resource use (Objective 11) and air quality (Objective 12). Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development and dependent on site specific proposals, 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.
- 6.4.21 The alternative housing figure has been assessed the same as the preferred option for the remaining objectives. Mixed positive and negative effects were identified in relation to transport (Objective 6) whilst minor negative effects were identified for climate change (Objective 7), water (Objective 10), waste and resource use (Objective 11) and air quality (Objective 12). There is some uncertainty with regards to air quality (Objective 12). The effects on health (SA Objective 2) may provide some positive benefits as delivery of new housing at a higher scale of growth (particularly affordable housing) may help towards the improvement of housing stock and enable people to move from poor quality housing to newer properties although this is uncertain and overall it is considered to have minor negative effects. Further negative effects were identified in respect of biodiversity (Objective 8), although there is uncertainty due to the location of development and dependent on site specific proposals, 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.

Summary of Appraisal of the Government's consultation housing need figure (1,070dpa)

- 6.4.22 The Government's consultation figure option uses the same starting point as Publication Draft preferred housing figure (the 2016 subnational household projections). Step 2 of the Government's proposed methodology (adjusting for market signals) involves applying a formula for increasing the baseline projections related to local median house price affordability (as described in previous section above). This leads to a substantial increase in housing need above the baseline projections. The Government's consultation figure option has therefore been assessed as having significant positive effects on housing (SA Objective 1) in the medium and long term. The figure would help meet the baseline household projections and include an uplift for affordability (based on the Government's proposed adjustment methodology). This is expected to help ensure that the needs of the City of York population would be met. There is some uncertainty related to the Government's need figure in the long term as it relates to the period 2016-2026. However, for the purposes of comparison it is assumed that the rate of housing need would continue for the Plan period.
- 6.4.23 The Government's consultation figure option is considered to have significant positive effects on educational and skills (SA Objective 3) in the long term and jobs and growth (SA Objective 4) in the medium and long term. This assessment is predicated on the basis that the level of growth has the potential to stimulate significant investment in educational services, through the creation of demand and commensurate developer contributions. The scale of growth in this option would also lead to significant economic benefits for the City. This would include direct benefits for the local construction industry as well as supporting investment in services and facilities whilst enhancing the viability and vitality of businesses in the City of York and other town centres. The Government's consultation figure option is therefore also considered to have significant positive effects in the medium and long term in relation to equality and access (SA Objective 5).
- 6.4.24 Mixed minor positive and significant minor effects have been found for sustainable transport (SA Objective 6) in the long term with a mix of minor positive and negative in the short and medium

term. Although there are likely to be opportunities to support sustainable transport measures and generate investment in integrated transport solutions, linked to the scale of housing need, there are also likely to be significant negative effects related to the increase in population and private car use, especially cumulatively in the longer term. In line with the assessment against SA Objective 6, the likely negative effects on climate change are also assessed as minor in the short and medium term and significant in the long term.

- 6.4.25 The Government's consultation figure option is assessed as having a minor negative effect on improving the health and well-being of York's population in the short, medium term and long term (SA Objective 2). However, the increased scale of growth may support positive effects by enabling those in poor housing to move to new properties. This is uncertain though.
- 6.4.26 The Government's consultation figure option is assessed as having negative effects on green infrastructure and biodiversity (SA Objective 8). The effects associated with the Government's consultation housing figure option are likely to be significant in the long term due to the scale of development and associated land take although there is uncertainty due to the location of development and is dependent on any site specific proposals that come forward to meet the housing need.
- 6.4.27 The effects on land resources (SA Objective 9) are assessed as being significantly negative in the medium and long term. This reflects that the Government's consultation housing figure option would require greater land take (particularly greenfield land) than the two other options. However, this effect is to some extent dependent on the location of development (and the take up of previously development land) whilst higher development densities could also mitigate some of the negative effects. Minor negative effects have been identified for water (Objective 10), waste and resource use (Objective 11) and air quality (Objective 12) although there is some uncertainty for water resources and air quality in relation to the location of development. The effects on water may be greater in the long term dependent on the implementation of water efficiency measures. For cultural heritage (SA Objective 14) and landscape (Objective 15) negative effects have been assessed. The effects may increase relative to the scale of development associated with meeting the housing need figure. Although there may be greater pressure on these assets, due to the potential pressure that is likely to be placed on the City's environmental assets by housing growth, this may be lessened and mitigated by the location and design of development and the policies contained within the Local Plan which seek to protect environmental assets.

Conclusion

- 6.4.28 Given the significant positive effects identified for the 2017 SHMA recommended alternative figure against the SA objectives for housing (Objective 1), employment (Objective 4) and equality of access (Objective 5) (with a similar performance for the remaining objectives to the preferred housing figure), the 2017 SHMA Update figure is considered to perform marginally better in sustainability terms than the preferred option.
- 6.4.29 In comparison to the preferred housing growth option (867 dpa) and reasonable alternative (953 dpa), the Government's consultation figure option (1070 dpa) is likely to have greater effects (both in terms of positive and negative effects) than either of these other options. Comparison of the likely effects would suggest that the Government's consultation figure option would provide greater positive effects on housing (SA Objective 1), education and skills (SA Objective 3), the economy (SA Objective 4) and access and equality (SA Objective 5). The significant effects are likely to be seen in the medium and long term.
- 6.4.30 However, the effects of the Government consultation figure option on the environmental objectives would be likely to be greater than the preferred figure (867dpa) and SHMA 2017 Update (953dpa). The negative effects associated with transport (SA Objective 6) and climate change (SA Objective 7) are likely to be significant whilst there are also likely to be greater negative effects on biodiversity (SA Objective 8) and land resources (SA Objective 9). Due to the higher level of housing need envisaged in the Government's consultation figure there is also potential for greater negative effects on cultural heritage (SA Objective 14) and landscape (SA Objective 15).

- 6.4.31 Balancing these considerations, whilst seeking to maximise the positive effects and minimise the negative effects of growth, suggests that of the three options, it is the SHMA 2017 housing growth reasonable alternative figure (953dpa) that is most likely to provide the preferable mix of sustainability benefits. In particular, it enables housing need to be met, consistent with current NPPF and NPPG requirements, with lower overall negative effects than the Government consultation figure option and greater positive effects than the preferred option.

Reasons for the Selection of the Preferred Housing Growth Option

- 6.4.32 The Council's Local Plans Working Group (LPWG) and Executive considered a report in July 2017 which set out the MHCLG baseline and GL Hearn recommended housing figures for consideration.⁷⁷ The housing figures presented for consideration reflected the latest sub-national household projections considered in the technical work of GL Hearn in the SHMA update (2017) and superseded the housing figure set out in the Preferred Sites Consultation (2016) of 841 dwellings per annum.
- 6.4.33 The Council's Executive determined that on the basis of the housing analysis set out in the report, the increased figure of 867 dwellings per annum (compared to the Preferred Sites Consultation figure of 841), based on the latest revised sub national population and household projections published by the MHCLG, should form the basis of the housing growth figure for consultation in the Local Plan Pre-Publication Draft (2017). This was supported for inclusion in the Publication Plan by the LPWG and Executive in January 2018. The selection of the preferred option reflects the decision of the Council to use the CLG baseline as the housing figure.

Reasons for the Rejection of Alternatives

- 6.4.34 In July 2017 the Council's Executive considered the GL Hearn 2017 Draft SHMA Update (July 2017), which recommended a further 10% uplift to the 867dpa figure for market signals (to 953 dwellings per annum). The Executive resolved that the existing housing figure of 867dpa be taken forward in the Local Plan. The Executive's reason for this was that the conclusions in the SHMA were "speculative and arbitrary, rely too heavily on recent short-term unrepresentative trends and attach little or no weight to the special character and setting of York and other environmental considerations."⁷⁸ The SHMA 2017 Update alternative housing figure of 953 was therefore rejected. A Pre-Publication Draft was then the subject of a six week consultation period.
- 6.4.35 In January 2018, the Executive⁷⁹ considered the responses to the Pre-Publication Draft, the implications of the Government's consultation on a methodology calculating 5 year housing supply (indicating 1,070dpa), and the Government letter highlighting York as a City at risk of Government intervention unless progress with the Local Plan could be demonstrated.
- 6.4.36 Officers recommended to the Executive that in light of the direction of travel in national policy, and the need to demonstrate progress in the plan making process, the Council would be in a more robust position if the scale of housing proposed at a number of existing proposed allocations were increased. However, this had to be balanced with the need to progress the Plan, and consideration given to whether further consultation would be required for these changes. Members only accepted increases to existing proposed strategic allocations. These changes to existing strategic allocations that had already been subject to consultation were considered not to be material, and Members were satisfied that the Local Plan could progress to Publication stage and final consultation. This decision was taken in light of their understanding of the Pre-Publication consultation responses, risk of further changes delaying moving forward with the Local Plan and on the basis of the desire to develop the Local Plan for the City of York based on the previously agreed housing figure, which they consider balances the need for growth with York's unique historic character and setting.

⁷⁷ City of York Council Committee Report and decision – Executive meeting 13th July, 2017 available via: <http://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&MId=10188&Ver=4>

⁷⁸ City of York Council Committee Report and decision – Executive meeting 13th July, 2017 available via: <http://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&MId=10188&Ver=4>

⁷⁹ City of York Council Committee Report and decision – Executive meeting 25th January, 2018 available via: <http://democracy.york.gov.uk/ieListDocuments.aspx?CId=733&MId=10195&Ver=4>

Reasons for the selection of the preferred employment growth option and for the rejection of alternatives

Considered Employment Land Target Options

- 6.4.37 For the purposes of this SA Report, the preferred employment growth option, as set out in Policy SS1, and the reasonable alternatives identified by the City of York Council have been appraised.
- 6.4.38 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 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 scenarios which have been translated into the following employment growth options:
- ▶ Alternative Option: Baseline Scenario – 10,500 new jobs;
 - ▶ Alternative Option: Employment Land Review (ELR) Option 1 – Higher Migration and Faster UK Recovery – 15,400 new jobs;
 - ▶ Preferred Option: ELR Option 2 – Re-profiled sector growth – 650 jobs per annum between 2017 and 2038 (around 13,650 over the period).
- 6.4.39 The ELR and the employment scenarios were presented to the City of York Local Plans Working Group (LPWG) and Executive in July 2017. The Report was accompanied by a SA Technical Report prepared by Amec Foster Wheeler which appraised the alternative figures.
- 6.4.40 The appraisal matrix for the preferred employment growth option and reasonable alternatives is set out in **Appendix N**.

Summary of Preferred Option Appraisal

- 6.4.41 The preferred employment growth option 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.
- 6.4.42 Significant positive effects have also been identified with regard to creating jobs and deliver growth of a sustainable, low carbon and inclusive economy (Objective 4), 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.
- 6.4.43 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.
- 6.4.44 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.

- 6.4.45 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.
- 6.4.46 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.
- 6.4.47 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.

Summary of Appraisal of Alternatives: Baseline Scenario and ELR Option 1

- 6.4.48 The Baseline Scenario identified a requirement for 10,500 new jobs whilst ELR Option 1 identified a requirement for an additional 4,900 new jobs over the baseline. Under ELR 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 ELR 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.
- 6.4.49 The baseline scenario was assessed as having no significant positive or negative effects against any of the SA Objectives. ELR 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 ELR Option 1 in response to land use (Objective 9). This assessment was predicated on the basis that the scale of development proposed under the ELR 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.
- 6.4.50 Both the Baseline Scenario and ELR Option 1 were appraised as having similar effects to the Preferred Option for housing and accessibility. 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.

- 6.4.51 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.
- 6.4.52 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.
- 6.4.53 On balance, the Preferred Option is considered to perform better, in sustainability terms, than either the Baseline Scenario or ELR 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 creating jobs and deliver growth of a sustainable, low carbon and inclusive economy (Objective 4) which is considered most complementary to the economic priorities of the Council.

Reasons for the Selection of Preferred Employment Growth Target Option

- 6.4.54 In undertaking the Preferred Sites Consultation in 2016, the Council identified its preference for the Preferred Option (ELR 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 presented to the LWPG and Executive in 2014.
- 6.4.55 To inform the Local Plan Pre-Publication Draft approach, (confirmed in the Publication Draft, 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's Executive decided to maintain ELR Option 2 as the best option for meet the economic needs of the City of York and achieve the desired outcomes of the York Economic Strategy (2016). The sensitivity test undertaken maintains the level of growth under this option as around 650 jobs per annum. The Preferred Option is also the best scoring in SA terms when considered against the reasonable alternatives.

Reasons for the Rejection of the Alternative Employment Growth Options

- 6.4.56 The Council rejected the alternatives as they would not meet the economic needs of the City of York and not achieve the outcomes of the York Economic Strategy. The alternatives did not perform as well as the Preferred Option in SA terms.

6.5 Spatial Strategy

- 6.5.1 As described in **Section 5.2**, the appraisal of the spatial strategy has been undertaken by appraising those policies concerning the quantum and location of development in Chapter 3 (Spatial Strategy) of the Local Plan Publication Draft alongside the strategic sites and smaller (local) allocations. A summary of the appraisal of each component of the spatial strategy is presented in the following sub-sections. The spatial strategy set out in the Local Plan Publication

Draft has been informed by options considered for the housing and employment growth figures in the Plan appraised in **Section 6.4**.

- 6.5.2 The appraisal of the spatial strategy contained within **Appendix F** and summarised below reflects the assessment of the spatial strategy policies undertaken in 2014 by AMEC and City of York Council as set out in the 2014 SA Report which accompanied the draft Local Plan considered by the Executive in September 2014.
- 6.5.3 As identified in the schedule in **Appendix M** Table 2, the appraisal was substantially updated at the Pre-Publication Draft SA Report stage, reflecting that there were number of new policies contained within the Spatial Strategy chapter regarding the strategic sites set out in the Local Plan Pre-Publication Draft. However, the thrust of the spatial strategy presented to the Executive in 2014 remained the same.
- 6.5.4 The appraisal at Pre-Publication Draft Stage in 2017 reflected the latest baseline, deletion of policies and any amendments to policies. The changes to the policies since the Pre-Publication Draft have largely been minor. **Appendix M** Table 1 identifies where the SA has been reviewed in light of these changes and notes where any changes have been made to the appraisal in **Appendix F**, whilst **Appendix C** identifies where changes to the appraisal have been made in light of consultation responses received to the SA Report at Pre-Publication Draft stage.

Spatial Strategy Policies

- 6.5.5 Policies SS1 to SS24 form the spatial strategy of the draft Local Plan. The policies set out: the quantum of housing and employment growth to be met over the plan period (SS1) and the strategic protection of the enduring Green Belt boundaries (SS2); and policies related to three strategic mixed use sites and regeneration areas (SS3-SS5), strategic housing sites (SS6-SS20) and strategic employment sites (SS21-SS24). The performance of these policies has been tested against the 15 SA objectives with the findings presented at **Appendix F**.
- 6.5.6 Overall, the policies have been appraised as having a significant positive effect on those SA objectives relating to health (SA Objective 2), education and skills (SA Objective 3), economic growth (SA Objective 4) and equality and accessibility (SA Objective 5). Minor positive effects are expected against biodiversity (SA Objective 8) and water (SA Objective 10). Mixed significant positive and minor negative effects have been assessed against housing (SA Objective 1), transport (SA Objective 6), cultural heritage (SA Objective 14) and landscape (SA objective 15). Mixed minor positive and negative effects are expected against climate change (SA Objective 7), land use (SA Objective 9), water (SA Objective 10), waste (SA Objective 11) and air quality (SA Objective 12).
- 6.5.7 The Spatial Strategy policies have been appraised as having mixed significant positive and minor negative effects on housing (SA Objective 1). The quantum of growth to be accommodated in the City of York is established principally through Policy SS1 (Delivery Sustainable Growth for York), reflecting the preferred housing and employment growth figures appraised in **Section 6.5**. Delivery is supported through policies SS3, SS4 and SS6 to SS20. SS1 sets out the housing requirement with the annual provision of 867 new dwellings per annum over the plan period (equivalent to 13,872 dwellings in the sixteen years between 2017/18 and 2032/33) and beyond (2032/33 to 2037/38). SS1 expresses this as a minimum requirement. The scale of development meets the projected baseline household growth in the City over the plan period and is considered to be the objectively assessed housing need for the City. However, it does not reflect fully the upward adjustment made for market signals such as land prices, affordability etc outlined in the Strategic Housing Market Assessment (SHMA) update (2017) – prepared for the City of York Council by GL Hearn – using the 2016 CLG baseline sub-national projections (the SHMA technical work included a 10% upward adjustment is added to make a housing figure of 953dpa).
- 6.5.8 Whilst significant positive effects against housing (SA Objective 1) have been assessed in the short and medium term, minor negative effects have been assessed in the long term. SS1 expresses 867dpa as a minimum housing requirement which may well be exceeded, and potentially substantially so. Indeed, the presence and extent of any minor negative effects in the long term

against this objective will be dependent on whether the minimum housing requirement (867dpa) is delivered within the plan period or whether it is exceeded. The potential for negative effects against this SA objective will diminish as the number of additional homes increases. To establish this will require effective and on-going monitoring of the plan's implementation. However, other policies in the spatial strategy (particularly SS3, SS4 and SS6 to SS20) are considered to have significant positive effects in delivery of a quantum of growth and a range of housing types, tenures and locations to support the City of York's needs.

- 6.5.9 Policy SS1, (and policies SS3, SS3 and SS21 to SS24), also make provision for sufficient employment land to accommodate 650 jobs growth a year (around 13,650 new jobs between 2017 and 2038) in sectors that align with the achievement of the York Economic Strategy (2016). York City Centre (SS3) is identified as a priority area for a range of employment uses and York Central (Policy SS4) will enable delivery of around 100,000m² of employment floor space as part of a mix of uses. The delivery of these sites, alongside the requirement for proposals in City Centre locations to enhance the quality of the City Centre (including in respect of retail offer, enhancement of the public realm, traffic reduction and promotion of the evening economy – see Policy SS4), will help enhance the competitiveness of York. Additionally, Policies SS21-SS24 focus on the strategic employment sites. Overall, the number of jobs to be provided over the plan period and the focus of economic growth in York City Centre is expected to support sustainable economic growth, improve prosperity and ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York, North Yorkshire and East Riding Local Enterprise Partnership (LEP) (in accordance with the key development principles of the Local Plan Publication Draft). Overall, the policies of the spatial strategy have therefore been assessed as having a significant positive effect on SA Objective 4 (Economy).
- 6.5.10 Taken together, the spatial strategy policies are expected to enhance the health and wellbeing of York's population including through:
- ▶ The provision of new high quality housing;
 - ▶ Preventing unacceptable pollution;
 - ▶ The provision of land for economic growth. Employment is generally associated with better physical and mental health and wellbeing;
 - ▶ The promotion of sustainable transport solutions including cycling and pedestrian routes; and
 - ▶ The protection and enhancement of access to open space (formal and informal).
- 6.5.11 This will be achieved at a City-wide scale and in relation to strategic sites where open space and service provision will accompany housing and other development and has been assessed as having a significant positive effect on SA Objective 2 (Health).
- 6.5.12 The spatial strategy is also expected to have a significant positive effect on equality and accessibility (SA Objective 5). The scale and broad location of mixed use development, housing and employment proposed in the policies mean that a range of dwellings and community facilities can 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 is expected to help ensure that accessibility is maintained and enhanced. Further, Policy SS5 promotes the revitalisation of the Castle Gateway and seeks public realm and accessibility improvements in this key location in the City
- 6.5.13 Mixed significant positive and minor negatives effects have been assessed on reducing the need to travel (SA Objective 6). Growth across the City may support sustainable transport funding and delivery. However, the growth in population associated with the new development identified will lead to an increase in private cars within the City. Some of the strategic policies include sites set away from key areas of higher order service provision, although some degree of self-containment will be secured on the larger sites (notably the proposed 'garden village' at Land West of Elvington Lane through SS13). However, the redevelopment proposals associated with York City Centre (SS3) and York Central (SS4) offer significant opportunities to provide for the co-location of living,

working, shopping and other recreation whilst Castle Gateway (SS6) will (inter alia) deliver cycle and pedestrian improvements in this part of the city.

- 6.5.14 Notwithstanding greenfield land-take associated with new development (and hence potential loss or displacement of biodiversity assets), there is 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 is reflected in Policy SS1 and also through specific opportunities identified in policies SS4, SS6 and SS10 (for example). The spatial strategy policies have therefore been generally assessed as having a positive effect on biodiversity (SA Objective 8). However, the HRA Screening Assessment at Pre-Publication Plan stage identified that Policies SS13, SS18 and SS19 have the potential for likely significant effects. The HRA assessed that the adoption of appropriate mitigation could remove the potential for likely significant effects in relation to SS18 although it was not found possible to mitigate policies SS13 or SS19 and these will be subject to an appropriate assessment. The HRA process is iterative and ongoing work has been used to refine and revise the plan at Publication Plan stage. Ongoing work has identified appropriate mitigation to reduce effects as far as it can at this stage prior to the finalisation of the HRA Report. However, the SA must await the outcome of this further assessment. As a consequence, the appraisal has concluded uncertain effects against these two policies on SA Objective 8. Notwithstanding the above, in light of the residual effects on Heslington Tilmire SSSI, SS13 has been assessed as having minor negative effects against this objective. Therefore, a mix of positive and negative effects with uncertainty has been assessed for the policies overall.
- 6.5.15 Significant levels of new development will inevitably bring change to the character of the City, particularly where this is associated with strategic sites. However, effects on the setting of the City can be managed and it is noted that Policy SS1 specifically seeks to conserve and enhance York's historic assets and character whilst policies SS3 to SS24 include locational specific guidance in this regard. The re-definition of the City's Green Belt through policy SS2 will also help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the City and look to concentrate development in the urban area, with attendant sustainability benefits. Some policies are considered to lead to negative effects for cultural heritage and landscape although mitigation (through the implementation of other policies in the plan (particularly those in the Placemaking, Heritage, Design and Culture section), master planning, screening and effective archaeological investigation would mitigate these negative effects to a large extent. However, based on the HIA, the effects of Policy SS24 on the landscape are expected to cause significant negative effects on the landscape. In consequence, and taken together, the spatial strategy policies have been assessed as having a mixed significant positive and minor negative effect on SA objectives relating to cultural heritage and landscape (SA Objective 14 and SA Objective 15).
- 6.5.16 An increase in population anticipated by Policy SS1 will have an inevitable negative effect on overall water usage and consumption across the City (SA Objective 10). However, the implementation of the spatial strategy policies overall is considered likely to have minor positive effects as the scale of housing provision will enable water management initiatives to be implemented whilst employment development (as part of SS3, SS4 and SS21 to SS24) must meet BREEAM 'excellent' standards. The policies are assessed as having mixed minor positive and negative effects on waste generation (SA Objective 11) as waste may increase but there are opportunities to maximise reuse and recycling through the spatial strategy policies as a whole.
- 6.5.17 No cumulative significant or minor negative effects were identified during the appraisal of the spatial strategy policies.
- 6.5.18 Mixed minor positive and negative effects have been identified in respect of SA objectives related to climate change (SA Objective 7), land use (SA Objective 9) and air quality (SA Objective 12). Impacts on air quality may be felt by communities during construction and over time through increased traffic in the area, whilst designated conservation sites near to roads with increased traffic may also experience negative effects. In terms of climate change, effects of the spatial strategy policies are likely to be mixed owing to increased emissions associated with new development but also opportunities for limiting carbon dioxide emissions through energy efficiency measures, renewable energy generation and facilitating sustainable travel. Furthermore, all

development proposals will be required to be accompanied by an Emissions Statement and accord with Policy ENV1.

- 6.5.19 Mixed effects in relation to land use, meanwhile, reflect the significant proportion of new development that will be located on greenfield but the opportunities this presents for comprehensive master planning could enhance green infrastructure resources. The development of York Central (SS4) is also a significant brownfield opportunity within the City, which has been assessed positively against this objective. Mixed effects have been assessed against air quality (SA Objective 12) reflects that improvements can be made through the location and design of new development to promote sustainable transport measures and reduce the need to travel by private car.

Strategic Sites

- 6.5.20 As part of the preparation of the Local Plan Pre-Publication Draft, the Council has considered further which strategic sites are to be allocated in order to support the delivery of the spatial strategy. This is in response to new site submissions, further information of existing proposed allocations arising from consultation undertaken by the Council on the Local Plan Preferred Options (2013), Further Sites Consultation (2014), Preferred Sites Consultation (2016) and Local Plan Pre-Publication Draft (2017).
- 6.5.21 To inform the selection of sites to be allocated in the draft Local Plan, all proposed strategic site allocations and alternatives have been subject to SA as part of the preparation of this report, including those that have already been subject to SA (in order to reflect the new information and/or site boundaries) using the assessment criteria in **Table 5.4** (see **Appendix H**). Proposed potential strategic site allocations and reasonable alternatives have also been subject to more detailed assessment against the SA objectives. The appraisal matrix for each site is contained in **Appendix I**. A summary of the appraisal of the strategic site allocations is presented in **Table 6.2**.
- 6.5.22 The reasons for the selection of the proposed strategic site allocations and rejection of the reasonable alternatives is set out in **Appendix K**.

Table 6.2 Summary of Strategic Sites Appraisal

Site ref	Allocation reference	Objective	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5: Equality & Accessibility	SAO6: Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
		Site Name															
295	ST1	British Sugar / Manor School	++	+ -	+ ?	+ -	++	+ -	+ -	+ -	++	-	-	-	0	+ -	+ -
910	ST2	Former Civil Service Sports Ground Millfield Lane	++	+ -	+ ?	+ -	++	++	+ -	+ -	+	-	-	+ -	0	-	0
35	ST4	East of Grimston Bar	++	+ -	+ ?	+ -	+	++	+ -	-	--	-	-	+ -	0	-	-
906	ST5	York Central	++	+ -	+ ?	++	+	++	+ -	0 -	+ ?	-	-	+ -	-	- ?	+ -
850	ST7	East of Metcalfe Lane	++	+ -	+ ?	+ -	+	+ -	+ -	+ -	--	-	-	-	0 -	- -	- -
849	ST8	Land North of Monks Cross	++	+ -	+ ?	+ -	++	+ -	+ -	-	--	-	-	-	0	0 -	0 -
823	ST9	Land North of Haxby	++	+ -	+ ?	+ -	+	+ -	+ -	0 -	--	-	-	-	-	-	-
848	ST14	Land to North of Clifton Moor	++	+ -	+ ?	+ -	++	+ -	+ -	- ?	--	-	-	-	0	-	- -
851	ST15	Land to the West of Elvington Road	++	+ -	+ ?	+ -	++	+ -	+ -	- ?	+ -	-	-	-	0 ?	- -	- -
719 927	ST16	Former Terry's Chocolate Factory	++	+ -	+ -	+ -	++	+ -	+ -	+ 0	+	-	-	-	0	+ -	+ -

Site ref	Allocation reference	Objective	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5: Equality & Accessibility	SAO6: Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
		Site Name															
931 932	ST17	Nestle South	++	+ -	+ ?	+ -	++	+ -	+ -	+ 0	+	-	-	0	0	+ -	+ -
857	ST19	Northminster Business Park	0	0 -	+ -	++	0	+	-	?	--	-	-	-	0	-	-
955	ST20	Castle Gateway	+ 0	+ -	+ ?	++	+ ?	++	+ -	- ?	++	-	-	+ --	--	- ?	+ -
948	ST26	South of Airfield Business Park	0	-	+ -	++	0	--	--	-	--	-	-	-	0	-	-
852	ST27	University Expansion	0	+ -	++	++	0 +	+ -	+ -	+ ?	--	-	-	-	- 0	-	- --
185	ST31	Land at Tadcaster Road	++	0 -	+ ?	+	+	+ -	+ -	-	--	-	-	-	0	- 0	-
929	ST32	Hungate	++	+ -	+ ?	++	++	+ -	+ -	-	++	-	-	--	--	? --	? --
855	ST33	Station Yard Wheldrake	++	-	+ ?	+	++	+ -	+ -	--	+ -	-	-	-	+	- 0	- 0
934	ST35	Queen Elizabeth Barracks, Strensall	++	+ -	+ ?	+ --	+	+ -	+ -	--	+ -	-	-	-	? 0	+ -	+ -
951	ST36	Impfal Barracks, Fulford Road	++	+ +	+ ?	+ --	++	+ -	+ -	--	+ -	-	-	--	? ?	? --	? --
246	ST37	Whitehall Grange	0	0 -	+ -	++	0	--	--	-	--	-	-	-	0	-	--

- 6.5.23 There are some aspects of the Local Plan Publication Draft where effects are more uncertain. These include biodiversity, water, waste, cultural heritage and landscape. This principally reflects the uncertainty surrounding the effects of development on the SA objectives that are in part unknown until detailed site development proposals come forward. However, the Local Plan Publication Draft includes policies which seek to manage impacts on these assets and in consequence, it is expected that significant adverse effects will be avoided.
- 6.5.24 The strategic sites predominantly comprise of housing developments with some employment allocations. Of the seventeen sites which are proposed as residential, sixteen have been assessed as having a significantly positive effect on housing due to the provision of more than 100 dwellings on site. Castle Gateway (ST20) has been assessed as having a minor positive effect due to the fact that the site is an area for regeneration with potential for mixed use. In total, the strategic sites listed in **Table 6.2** are expected to provide approximately 13,500 dwellings. This will make a significant contribution towards meeting the housing needs of York, the majority occurring over the duration of the plan period (15 years) but also beyond. Ten of the proposed strategic sites were also assessed as having significant positive effects on SA Objective 5 (Equality and Accessibility) largely due to the provision of affordable housing and provision of services/facilities nearby. The remaining seven sites also had a minor positive effect on this objective.
- 6.5.25 The majority of the sites had a mixed minor positive and minor negative, or mixed negative and neutral effect on SA Objective 2 (Health). The positive impacts reflect that all of the sites had good provision of open space, cycling or walking links together with provision of healthcare facilities within proximity. The minor negatives reflect short-term construction noise which may affect nearby receptors and longer term disturbance as a result of occupation. Uncertainty was raised in relation to the scale of the positive impacts being dependent on the uptake of recreational activity / walking and cycling as well as the requirement for commensurate facilities to meet population needs in the future.
- 6.5.26 Similarly, sixteen of the sites also had mixed minor positive and uncertain effects on SA Objective 3 (Education). These effects were identified due to provision of schools locally, particularly primary schools, as well as potential for training opportunities during the short-term as a consequence of construction. Uncertain impacts were identified where there was limited provision of education and to indicate that capacity of future educational needs is unknown. All strategic housing site appraisals recognised the need for co-ordination between developers and the Council to ensure that sufficient nursery, primary and secondary education capacity is provided and phased alongside development.
- 6.5.27 Seven of the strategic sites were assessed as having a significantly positive effect on SA Objective 4 (Economic growth and employment), four of which are sites that have been allocated specifically for employment purposes. ST19, ST26, ST27 and ST37 will deliver around 129,000m² of employment floorspace for a range of B uses whilst ST5, ST20 and ST32 are large city centre mixed use developments with ST5 (York Central) identified for 100,000m² of B1a business use. Taken together all of these sites are expected to generate a significant number of employment opportunities within York and will help fulfil York's role as an economic driver of the region. Other strategic housing sites have been assessed as having positive effects on this objective through provision of temporary construction jobs in the short-term, the availability of longer term employment opportunities in new local facilities, and the proximity of major employers and good transport links to support a flexible workforce and local economy. ST35 and ST36 are recognised as having a mix of minor positive effects and significant negative effects. The negative effects are assessed due to the loss of specialised military employment at these locations within the city.
- 6.5.28 Ten of the proposed strategic sites were also assessed as having significant positive effects on SA Objective 5 (Equality and accessibility) largely due to the provision of affordable housing and provision of services/facilities nearby.
- 6.5.29 Seven sites have been assessed as having a significant positive effect on SA Objective 6 (Transport) reflecting the good provision of sustainable transport links such as cycle routes, park and ride, bus services and train stations. However, four of the sites are identified to have significant negative effects as they will likely exacerbate already congested roads (ST32 and ST36) or have limited transport options limiting accessibility using alternative modes to the car (ST26 and ST37).

Ten sites had a mixture of both minor positive and minor negative effects as it was assessed that the extent to which their development will add to congestion is dependent on the uptake of alternative transport modes to the car.

- 6.5.30 In line with the transport objective, ST26 (South of Airfield Business Park) and ST37 (Whitehall Grange) were assessed as having a significant negative effect on SA Objective 7 (Climate change) because of their location, paucity of bus routes and density of new employment space resulting in a significant number of employees likely to rely upon private car to travel to the site. These new road users will not only add their own emissions but exacerbate existing road users' emissions through adding to congestion. ST19 (Northminster Business Park) is also likely to attract car born travel but is served by better transport links, including frequent bus via the park and ride, potentially reducing this effect and consequently received a minor negative impact appraisal. ST5 (York Central) received a minor positive effect because of its excellent transport links in the centre of York and ability to include renewable energy technologies, including district heating. The remaining seventeen strategic sites were a mixed minor positive and minor negative. Mixed effects were predominantly identified where emissions during construction and occupation could be minimised through the delivery of a low-carbon construction/energy generation strategy.
- 6.5.31 York's abundance of European and local nature conservation designations as well as high potential for biodiversity has led to the majority of strategic sites being assessed as having a potentially minor negative effect on SA Objective 8 (Biodiversity). Significant negative effects were identified on five strategic sites. Two of these sites have local designations within 50m whilst the remaining three sites (ST15, ST33 and ST35) aligns with the outcomes of the HRA Screening Report (2017), which identified that Appropriate Assessment is required to understand whether likely significant effects can be discounted. Significant effects are identified for ST15 and ST33 predominantly for their potential to have likely significant effects on the Lower Derwent Valley SPA and on ST35 given it is located adjacent to Strensall Common SAC designated for lowland heath, which is vulnerable to disturbance as a result of recreation. Effects on biodiversity for both minor and significant effects are expected to be mitigated through implementation of policies within the Local Plan Publication Draft although this is subject to implementation and in addition to site specific mitigation measures to be introduced at the detailed planning stage. Positive effects were identified on five sites where opportunities exist to enhance biodiversity on site.
- 6.5.32 Four sites (ST1, ST5, ST20 and ST32) were assessed as having a significant positive effect on SA Objective 9 (Land use) as all of these sites will involve wholly developing previously development land (Brownfield sites). Three (ST2, ST16 and ST17) had a minor positive effect reflecting their part brownfield status and evidence reflecting remediation of contamination in the case of ST16/ST17. Four sites were also identified with potential minor negative and minor positive effects where they were mixed brownfield/greenfield, some of which had potential for contamination issues. The remaining sites were assessed as having significant negative impacts given they involved developing Greenfield land and involve the loss of agricultural land.
- 6.5.33 All of the sites received a minor negative assessment for SA Objectives 10 and 11 (Water Quality and Waste) as all uses proposed would increase water consumption and waste. Whilst the impacts can be mitigated through efficiency and using the waste hierarchy, increase in the overall population/economy is likely to have an overall negative effect.
- 6.5.34 ST20, ST32 and ST36 were also identified to have potentially significant negative effects on SA Objective 12 (Air quality) as result of transport and associated deteriorating air quality, with the latter sites also potentially negatively contributing to AQMAs. The majority of the remaining sites were identified as likely to have a minor negative effect on air quality. Those sites with good access to alternative transport modes may offset some negative effects subject to uptake and use by residents.
- 6.5.35 The majority of strategic sites are appraised as having neutral effects on SA Objective 13 (Flood Risk) as they are located within low flood risk areas (flood zone 1) in line with the spatial shapers in the spatial strategy. Four sites are identified to have minor negative effects on SA Objective 13 given they are located within flood zone 2 or have surface water/drainage issues. ST20 and ST32, located within the city centre and adjacent to the Rivers Ouse and Foss respectively, are appraised

as significantly negative against objective 13 (Flood Risk) due to their location in a high flood risk zone. All sites were identified to require flood risk assessment and sustainable drainage strategies.

- 6.5.36 Effects on SA Objective 14 (Cultural Heritage) were predominantly assessed as minor negative due to potential detrimental effects on historic assets, local culture and setting, archaeology and views. However, significant negative effects were identified for ST7 due to potential interruption to views towards the Minster and on ST32 / ST35 due to their location and density of heritage assets that may be affected by development. York's rural setting also led to the majority of sites also being assessed as having minor negative effects on SA Objective 15 (Landscape).
- 6.5.37 Six of the strategic sites (four of which are greenfield and two with a mix of brownfield and greenfield land) were identified as having potentially significant negative effects as a result of visibility of new development and reducing the perception of York in a rural setting. ST32 (brownfield) was also assessed as having potentially significant negative effects due to the potential impacts on the Core Conservation Area and visible historic grain of the City. It is anticipated that in all instances negative effects for both heritage and landscape objectives can be overcome through implementation of policies set out in the Local Plan which aim to mitigate adverse effects on York's setting and cultural heritage. It is therefore envisaged that adverse effects would be minimised prior to development taking place. Positive effects were identified for both objectives on brownfield sites where development presents an opportunity to enhance York's setting and landscape overall through high quality design and masterplanning. Uncertainties in relation to these objectives were identified where further evidence is required to ascertain the scale of impacts.

Local Sites

- 6.5.38 The City's remaining housing and employment land requirements are to be met at smaller (local) allocations. Like the strategic sites, as part of the preparation of the Local Plan Publication Draft the Council has considered further which smaller scale sites are to be allocated in order to support the delivery of the spatial strategy. This is in response to new site submissions and further information on existing proposed allocations arising from consultation undertaken by the Council on the Preferred Sites Consultation (see Section 2).
- 6.5.39 To inform the selection of sites to be allocated in the Local Plan Publication Draft, all proposed local allocations and alternatives have been subject to SA as part of the preparation of this report, including those that have already been subject to SA at the Local Plan Preferred Options (2013), Publication Draft (2014) which was not consulted on, and Preferred Sites Consultation (2016) stages (in order to reflect the latest information available) using the site assessment criteria. Additionally, sites for Travelling Showpeople and Student Housing have also been subject to appraisal. The performance of these sites against the 15 SA objectives is presented at **Appendix H**. A summary of the appraisal of those sites that are proposed as allocations is presented in **Table 6.3**. The reasons for the selection of the proposed allocations and rejection of reasonable alternatives is set out in **Appendix K**.

Table 6.3 Proposed Local Site Allocations

Call for Sites Ref	Local Plan Ref	SITE NAME	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
58	H8	Askham Bar Park and Ride Site	+	+	+	0	++	+	-	++	0	0	0	0	0	0
59	H22	Heworth Lighthouse	+	++	+	0	++	+	-	++	0	0	0	0	0	0
64	H55	Land at Layerthorpe and James St	+	++	++	0	++	+	-	++	0	0	I	-	0	0
83	H53	Land at Main Street, Knapton	+	+	-	0	+	0	0	-	0	0	0	0	0	0
95	H39	North of Church lane Elvington	+	+	+	0	+	+	-	-	0	0	0	0	0	0
98	H23	Grove House EPH	+	++	++	0	++	+	0	++	0	0	I	0	-	0
124	H20	Oakhaven EPH	+	++	+	0	++	+	0	++	0	0	0	0	0	0
127	H5	Lowfields former school site	++	++	++	0	+	+	0	+/-	0	0	0	0	-	-

Call for Sites Ref	Local Plan Ref	SITE NAME	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
166	H29	Land at Moor Lane	+	++	-	0	I	+	0	-	0	0	0	0	0	-
172	H7	Bootham Crescent Football Stadium	+	++	++	0	++	+	0	++	0	0	0	0	-	0
182	H46	Land to North of Willow Bank and East of Haxby Road, New Earswick	++	++	++	0	+	+	-	-	0	0	0	0	-	-
472	H1	Former Gas Site 24 Heworth Green	++	++	++	0	++	+	-	++	0	0	-	-	-	0
656	H10	Barbican Centre	++	+	+	0	++	+	0	++	0	0	-	0	-	0
677	H38	Land RO Rufforth Primary School	+	+	+	0	+	+	0	-	0	0	0	0	0	0
828	H56	Land at Hull Road	+	++	++	0	++	+	0	+/-	0	0	0	0	-	0
832	H6	RO the square Tadcaster Road	0	+	+	0	++	0	0	-	0	0	0	0	-	-

Call for Sites Ref	Local Plan Ref	SITE NAME	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
853	H3	Revised Burnholme School	+	++	+	0	+	+	0	+/-	0	0	0	0	0	0
930	H31	Eastfield Lane Dunnington	+	++	-	0	+	+	0	--	-	0	0	0	0	0
936	H59	Queen Elizabeth Barracks Strensall – Howard Road, Strensall ⁸⁰	+	+	+	0		+	-	+/-	0	0	0	-	0	-
938	H58	Clifton Without Primary School	+	++	++	0	++	+	0	++	0	0	0	0	-	0
946	H52	Willow House EPH, Long Close Lane	+	+	-	0	++	+	-	+/-	0	0	-	0	-	0
General Employment Site Allocations																
600	E8	Wheldrake Industrial Estate	0	-	-	+		+	0	--	0	0	0	n/a	-	0
602	E9	Elvington Industrial Estate	0	++	++	++		+	0	--	-	0	0	n/a	0	0

⁸⁰ Site H59 Queen Elizabeth Barracks Strensall – Howard Road, Strensall is adjacent to the Strategic Site ST35 but does not form part of the strategic allocation and has therefore been assessed separately as a local site allocation.

Call for Sites Ref	Local Plan Ref	SITE NAME	SAO1: Housing	SAO2: Health	SAO3: Education	SAO4: Economy	SAO5 / SAO6 Equality & Access/Transport	SAO7: Climate Change	SAO8: Biodiversity	SAO9: Land Use	SAO10: Water	SAO11: Waste	SAO12: Air Quality	SAO13: Flood Risk	SAO14: Cultural Heritage	SAO15: Landscape
General Housing Site Allocations																
639	E11	Annamine Nurseries	0	+	++	++	++	+	0	++	0	0	0	n/a	0	0
706	E10	Chessingham Park, Dunnington	0	++	++	+	I	0	-	-	0	0	0	n/a	0	0
742	E16	Upper Poppleton Garden Centre	0	+	-	++	++	+	-	++	0	0	0	n/a	0	0
925	E18	Towthorpe Lines	0	+	-	++	I	+	-	++	0	0	0	n/a	0	--
Travelling Showpeople Site Allocation																
22	SP1	The Stables Elvington	+	-	-	0	I	0	0	++	-	0	0	0	0	-
Student Housing Site Allocation																
137	SH1	Land at Heworth Croft	+	++	++	0	++	+	-	+/-	-	0	I	-	-	-

Local Sites – Housing

- 6.5.40 All proposed housing allocations have been assessed as having a positive effect on SA Objective 1 (Housing) with the exception of RO the square Tadcaster Road (H6) which is identified as a site for C3 use class development and has been scored neutrally for this objective. Housing provision associated with the delivery of 4 sites (H1: Former Gas Site 24 Heworth Green; H5: Lowfields former school site; H10: Barbican Centre; and H46: Land to North of Willow Bank and East of Haxby Road, New Earswick) is of a scale considered to be significant (i.e. in excess of 100 dwellings). Cumulatively, this scale of provision is considered to be significant, helping to meet the housing needs of the City.
- 6.5.41 The majority of sites (13 out of 21) have also been assessed as having a significant positive effect on SA objectives relating to health and wellbeing (SA Objective 2), equality and accessibility (SA Objective 5) and transport (SA Objective 6) owing to their close proximity to key services and facilities and transport links. However, the performance of sites against SA Objective 3 (Education) was more mixed reflecting a variation in accessibility to educational facilities. Although the majority of sites (16 out of 21) scored positively or significantly positively against the objective, in respect of those sites located within the outlying villages such as Copmanthorpe, Dunnington and Knapton, negative effects were recorded. H53: Land at Main Street, Knapton was assessed as having significant negative effects in relation to this objective. All sites were assessed as scoring positively against SA Objectives 5 (access to services) and 6 (reducing the need to travel) with the exception of H29: Land at Moor Lane and H59: Queen Elizabeth Barracks – Howard Road, Strensall. Significant positive effects were recorded for 13 of the preferred allocation sites.
- 6.5.42 Housing sites have been identified on sites that are classified as greenfield, brownfield and a mix of both. Significant positive effects on land use (SA Objective 9) have been recorded for 9 of the sites that are to be delivered on brownfield land. However, the development of several sites would result in the loss of greenfield land and in the case of 6 sites, this would comprise land classified as grades 1, 2 or 3 agricultural land (the 'best and most versatile' agricultural land). For these sites, negative effects on land use have been assessed as significant. 5 sites have been assessed as having a mix of positive and negative effects due to the sites being located on a mix of brownfield and greenfield land.
- 6.5.43 With the exception of two sites (H6: RO the square Tadcaster Road and H53: Land at Main Street, Knapton), all of the proposed housing allocations are considered to be of a scale that has the potential to incorporate/connect to district heating and combined heat and power networks. Overall, effects on SA Objective 7 (Climate Change) are therefore considered to be positive.
- 6.5.44 A number of sites have been assessed as having a negative effect on SA Objective 8 (Biodiversity) with two sites (H39: North of Church lane Elvington and H59: Queen Elizabeth Barracks – Howard Road, Strensall) identified as having a significant negative effect on this SA objective. This reflects their close proximity (i.e. within 250m) to statutory nature designations. In the case of H39 it relates to proximity to the Derwent River Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) and for H59 it relates to Strensall Common Special Area of Conservation (SAC) and SSSI. The HRA Preliminary Assessment, in its commentary on H59, concluded that this site must be subject to HRA in order to assess the potential for likely significant effects arising from recreational pressure, changes to the hydrological regime and increased nitrogen deposition associated with increased traffic movements. For the remaining sites, it is anticipated that any adverse effects on biodiversity could be mitigated through implementation of draft Local Plan policies. Significant negative effects have also been identified in respect of one site that is within 10m of a waterbody (H31: Revised Eastfield Lane Dunnington).
- 6.5.45 Three sites (H1: Former Gas Site 24 Heworth Green; H10: Barbican Centre; and H52: Willow House East) are within 50m of an Air Quality Management Area (AQMA) and have therefore been assessed as having a minor negative effect on air quality. Three sites, meanwhile, are within Flood Zone 2 and have been assessed as having minor negative effects on flood risk (H55: Land at Layerthorpe and James St.; H1: Former Gas Site 24 Heworth Green; and H59: Queen Elizabeth Barracks – Howard Road, Strensall). However, it is anticipated that the potential adverse effects

on these SA objectives could be mitigated through the application of draft Local Plan policies (including G12, ENV1, ENV2, ENV4 and ENV5) and at the individual planning application stage, when detailed design and mitigation measures will also be considered (such as site layout, design and access and the incorporation of ecological enhancement measures and Sustainable Drainage Systems (SuDS)).

- 6.5.46 As identified within the appraisal of the Strategic Sites, significant new levels of development will inevitably bring change to the character and historic setting of the City. Effects on SA objectives relating to cultural heritage and landscape have been assessed as being largely negative given the potential for impacts on the historic setting and character of the City. However, the Local Plan Publication Draft contains proposed policies which seek to minimise the adverse effects of development on the City's character and historic assets, the implementation of which are expected to reduce the potential for adverse effects on these SA objectives.

Local Sites – Employment

- 6.5.47 Commensurate with the scale of employment land provision and the potential for job creation, all of the proposed employment sites have been assessed as having a positive effect on SA Objective 4 (Employment) with the scale of employment land provision (and hence potential job creation) associated with two of the sites (E18: Towthorpe and E16: Poppleton) having significant effects and a further three sites having the potential to deliver significant positive effects.
- 6.5.48 Two of the employment sites have been assessed as having a significant positive effect on the SA Objective 2 (Health), reflecting their proximity to doctors and areas of open space. A further three sites have recorded a positive assessment due to their proximity to open space. Three of the employment sites (E9: Elvington Industrial Estate, E10: Chessingham Park and E11: Annamine Nurseries) have been assessed as having significant positive effects against the SA Objective 3 (Education), the remaining three sites all recorded a negative assessment.
- 6.5.49 Two sites, E11: Annamine Nurseries and E16: Poppleton Garden Centre recorded positive significant effects against the SA Objective 5 (Equality and Accessibility Objective), reflecting their proximity to frequent bus routes, park and ride stops and cycle routes, all providing an alternative to the need to travel to these sites by private car. No adverse effects were recorded against this objectives for the remaining four sites.
- 6.5.50 Two sites, E10: Chessingham Park and E18: Towthorpe, recorded significant negative effects against the SA Objective 8 (Biodiversity). The negative effects were recorded due to their proximity to Statutory Nature Conservation Sites. The HRA Preliminary Assessment, in its commentary on E18, identifies that the Towthorpe site is in close proximity to the Strensall Common SAC. The preliminary assessment has concluded that this site must be subject to HRA in order to assess the potential for likely significant effects arising from recreational pressure, changes to the hydrological regime and increased nitrogen deposition associated with increased traffic movements. For the remaining sites, it is anticipated that any adverse effects on biodiversity could be mitigated through implementation of draft Local Plan policies.
- 6.5.51 Against the SA Objective 9 (Land Use), significant positive effects were identified for Towthorpe (E18), Poppleton Garden Centre (E16) and Annamine nurseries (E11) site, reflecting their brownfield nature. The remaining three sites (E8: Wheldrake, E9: Elvington and E10: Chessingham) are all greenfield agricultural sites and accordingly significant negative effects were recorded.
- 6.5.52 Significant negative effects have been recorded against Objective 15 (Landscape) for the Towthorpe site (E18). The HIA identified that development on this site may impact upon the biodiversity of Strensall/Towthorpe Common. The HIA identifies that whilst there is already built development on this site it is set back from the highway and is of an isolated character.

Local Sites - Travelling Showpeople

- 6.5.53 A single site is allocated for Travelling Showpeople (for a total of three plots) under Policy H6. The site, at The Stables, Elvington is expected to have a positive effect on SA Objective 1 (Housing) in helping to meet plot requirements identified in the update to the Council's City of York Gypsy and Traveller Accommodation Assessment Update (2017). No sites are allocated specifically to meet the needs of Gypsies and Travellers with suitable provision available at existing sites and through strategic housing sites (see Policy H5). The Council will also consider appropriate applications which seek to meet the needs of Gypsies, Travellers and Travelling Showpeople in accordance with the requirements of Policies H5 and H6.
- 6.5.54 Significant positive effects have been recorded on the site assessment against the Objective 9 (Land Use) reflecting the development on a brownfield site. Significant negative effects were recorded against Objective 2 (Health), 3 (Education) and 10 (Water), reflecting the lack or distance of the site from a GP, open greenspace, local education provision and the sites proximity to waterbodies. As with housing and employment allocations, it is anticipated that the potential effects on these SA objectives could be mitigated through the application of draft Local Plan policies and at the individual planning application stage, when detailed design and mitigation measures will also be considered
- 6.5.55 Minor negative effects have been recorded against Objective 15 (Landscape) arising from the Heritage Impact Assessment.

Local Sites - Student Housing

- 6.5.56 One site has been allocated for student housing at Land at Heworth (SH1) under Policy ED5: York St. John University Further Expansion. This site has been assessed as having a positive effect on SA Objective 1 (Housing). Significant positive effects were assessed for SA Objectives 2 (Health), 3 (Education), 5 (Access to Services) and 6 (Reducing the Need to Travel), recognising the site's location close to a range of services and facilities.
- 6.5.57 Significant negative effects were assessed for SA Objectives 10 (Waterbodies), and 13 (Flood Risk) reflecting that some of the site is located within Flood Zone 3a and is located close to the River Foss. Minor negative effects were assessed for SA Objective 8 (Biodiversity) reflecting that the site includes part of the regional Green Infrastructure Corridor and is adjacent to the River Foss Corridor. Minor effects were also found in relation to SA Objectives 14 (Historic Environment) and 15 (Landscape).
- 6.5.58 Mixed positive effects were found in relation to SA Objective 9 (Land use) due to the site comprising a mix of greenfield and brownfield land.

6.6 Thematic Policies

- 6.6.1 The performance of the 80 thematic policies contained within the Local Plan Publication Draft (i.e. those contained sections 4 to 15) has been tested against the 15 SA objectives. Each policy has been individually assessed against the SA objectives and commentary provided describing the potential effects. Where appropriate, mitigation measures have been identified in order to address adverse effects and enhance positive effects.
- 6.6.2 The scores are only intended to serve as an indication of the types of effects that may occur based on the level of information available. The full findings of the appraisal are presented at **Appendix J**. A summary of the appraisal is presented in the following sub-sections, grouped by draft Local Plan Publication Draft chapter.
- 6.6.3 The appraisal of the policies contained within **Appendix J** and summarised below reflects the assessment of the thematic policies undertaken in 2014 by AMEC and City of York Council as set out in the 2014 SA Report which accompanied the draft Local Plan considered by the Executive in September 2014.

- 6.6.4 As identified in the schedule in **Appendix M** Table 1, the appraisal was substantially updated at the Pre-Publication Draft SA Report stage, reflecting that there were number of new policies, amendments and deletions contained in the Local Plan Pre-Publication Draft. The update at Pre-Publication Draft Stage reflected the latest baseline, deletion of policies and any amendments to policies. The changes to the policies since the Pre-Publication Draft have largely been minor. **Appendix M** Table 1 identifies where the SA has been reviewed in light of these changes and notes where any changes have been made to the appraisal in **Appendix J**, whilst **Appendix C** identifies where changes to the appraisal have been made in light of consultation responses received at Pre-Publication Draft stage.

Economy and Retail

- 6.6.5 Section 4 of the Local Plan Publication Draft contains nine policies which identify those site which will accommodate different types of economic growth, protect overall supply of employment sites and addresses specific aspects of economic growth including retail development. Overall, the policies have been appraised as having a positive effect on the SA Objectives, in particular significant positive effects are expected against health and wellbeing (SA Objective 2), jobs and employment (SA Objective 4), equality and access (SA Objective 5) and sustainable travel (SA Objective 6). Minor positive effects are anticipated against the housing (SA Objective 1), education (SA Objective 3), land resources (SA Objective 9) and waste (SA Objective 11) objectives.
- 6.6.6 The Employment Land Review (ELR) (2016) includes a series of job growth forecasts for York using Oxford Economic Forecasting (OEF) for the period 2013 to 2038. This sets out a baseline scenario and two growth scenarios, including a preferred scenario focusing on strong growth in professional and technical services. Around 38ha is required in the City of York area. Policy EC1: makes provision for a range of employment development during the plan period including the identification of 240,000m² of floorspace for office, research and development, light industrial, storage and distribution, leisure uses and further employment sites to meet the forecast demand. The policy identifies that the City Centre will remain the focus for main town centre uses and such uses outside of the City Centre will only be considered acceptable where it can be demonstrated that they will not have a detrimental impact on the city centre's viability. Accordingly, many of the proposed employment sites have been appraised as having significant positive effects in relation to SA Objectives 6 (Travel) and 7 (Climate Change). The delivery of the identified sites will enhance the competitiveness of York. The implementation of this policy will help to increase employment land and create significant employment opportunities to support sustained economic growth over the plan period.
- 6.6.7 Policies EC2 to EC5 provides the policy framework for managing the loss of employment land, business and industrial uses within residential areas, tourism and the rural economy. The emphasis of these policies to promote new development in appropriate locations which accord with the wider policy requirements of the local plan. The implementation of policy EC2 would help to ensure that any development proposals would not lead to the loss of deliverable employment sites which are necessary to meet employment needs during the plan period. Policies EC4 and EC5 will provide opportunities to support tourism related development and to help to sustain and diversify the rural economy.
- 6.6.8 Overall, the employment and retail policies (R1-R4 inclusive) have been assessed as having a significant positive effect on SA Objective 4 (jobs and economy) The implementation of Policy R1 would help to maintain and enhance the viability and vitality of the city centre, district and neighbourhood centres whilst Policy R4 will help to ensure that out of centre retailing is only permitted in specific circumstances and where it could be demonstrated that there would be no adverse impacts on the city centre.
- 6.6.9 The creation of new employment opportunities identified through policies EC1, EC4 and EC5 are expected to have a minor positive effect on SA Objective 3 (Education and Skills). It is anticipated that the increase in employment opportunities will create opportunities for training and education. However this will depend in part upon the individual employment practices of any business. Increasing the availability of employment will help to increase employment opportunities through the identification of specific sites and through the identification of a retail hierarchy and have been

appraised as a significant positive against SA Objectives 5 (Equality and Accessibility) and 6 (Reducing the Need to Travel) and 12 (Air Quality).

- 6.6.10 The retail hierarchy set out in Policy R1 would help to reduce the need to travel by ensuring that services and facilities are located in existing locations which are already well served by public transport. The focus on the delivery of employment opportunities across the city and maintaining the role of the city centre is expected to maintain and enhance accessibility. A positive and negative assessment was recorded against SA Objective 6 (Travel) for Policy EC1 on the basis that whilst sustainable locations were sought for new employment development across York, it is inevitable that new employment sites would generate an increase in vehicles and vehicle movements above the existing baseline. The positive and negative assessments have been replicated on SA Objective 7 (Greenhouse Gases) for Policies EC1, EC3 and EC4 due to an increase in vehicle movements, which are forecast to increase across York by 2.5% per annum, resulting in an increase in greenhouse gas emissions. This will need to be adequately mitigated, in part, through the preparation of Travel Plans and through the provision of infrastructure which supports cycling and walking to promote changes in travel behaviour. It will be important for the Local Plan to ensure that any economic development does not exacerbate any problems in respect of York's existing Air Quality Management Areas. These are found around the inner ring road in York City Centre and separately at Fulford. Mitigation measures, notably contained within Policy ENV1 require development within these areas to ensure that any impact on air quality from a proposed development is acceptable including mechanisms to reduce further exposure to poor air quality.
- 6.6.11 Significant levels of growth and new development will result in change to the character of York. New economic development could have adverse effects on York's historic environment and culture. Site appraisals have identified that some employment sites will have a negative effect due to their scale and location. There will be mitigation from other policies within the Local Plan, in particular through design policies and protecting heritage assets. The overall effects of the policies on SA Objectives 14 (Historic Environment) and 15 (Natural and Built Landscape) were assessed as being uncertain due to the implementation of policies possibly leading to positive or negative effects. However, through the implementation of other policy areas (notably Placemaking, Heritage, Design and culture) negative effects could be mitigated. The objective of the plan is to strengthen the role of existing centres and limiting out of centre development (Policies R1 –R4). The HIA has identified that concentrating town centre uses within the City Centre will help to maintain the city's dense urban fabric.
- 6.6.12 The focus of delivering employment sites on brownfield land (approximately 40% of economic development sites are identified as being on brownfield land) and the emphasis of the retail policies upon strengthening the role of existing centres and therefore reducing the amount of greenfield land required for new retail developments will promote the positive use of land. In response to this, Policies EC2, EC6 and R1-R4 have been appraised a minor positive against Objective 9 (land use).
- 6.6.13 No significant negative effects were identified during the appraisal of the Economy and Retail policies.

Housing

- 6.6.14 Section 5 of the Local Plan Publication Draft sets out the policies and allocations required to address the housing challenge of providing both a sufficient number of new homes and an appropriate type and mix to meet the City's needs. The delivery of this objective is contained within Policies H1 – H10. Overall, the policies have been appraised as having a significant positive effect on those SA Objectives relating to health and equality (Objective 2) and equality and access for all (Objective 5). Mixed significant positive and minor negative effects were assessed for housing (Objective 1). Minor positive effects were recorded against jobs and growth (Objective 4), travel (Objective 6), waste (Objective 11), historic environment (Objective 14) and natural and built environment (Objective 15).

- 6.6.15 Policy H1 identifies those sites which have been allocated to meet the housing requirement set out in Policy SS1 (and policies H6 and H7 identify locations for Travelling Showpeople Sites and Student Housing respectively). As identified in **Section 6.5**, Policy SS1 identifies the quantum of growth to be accommodated in York, this includes a minimum annual provision of 867 new dwellings over the plan period up to 2032/33. This equates to a requirement for 13,872 dwellings in the sixteen years between 2017/18 and 2032/33. The delivery envisaged through H1 would help the plan meet and exceed this identified requirement. In a similar way to the assessment of Policy SS1, although positive effects would be likely in the short and medium term there is likely to be minor negative effects in the long term as the delivery in H1 would meet the CLG baseline population and household growth projections but not fully meet the PPG compliant approach to the calculation of housing need in the City of York area (as set out in the Strategic Housing Market Assessment (SHMA) (2017 update) technical work prepared for the Council by GL Hearn). This is because the requirement does not include an upward adjustment of the baseline for housing market signals. Even with the shortfall for 2012-2017 annualised over the period (56dpa), the 'annual target' is below that identified with the SHMA (furthermore the SHMA figure of 953 would have to take account of the shortfall in any event leading to a nominal housing figure of 1,009dpa). However, the presence and extent of the negative effects is dependent on the delivery of housing on the ground during the plan period above the housing figure. Careful monitoring is therefore required.
- 6.6.16 The implementation of Policies H2 (Density of Residential Development), H3 (Balancing the Housing Market) will help to ensure that there is a good balance and mix of housing provided as part of new housing developments which would be particularly important in meeting the housing needs of York. Policies H5 (Gypsy and Travellers) and Policy H6 (Travelling Showpeople) would help to address a shortfall of accommodation for these groups with baseline information demonstrating a need for 47 Gypsy and traveller pitches and 3 plots for Showpeople. The implementation of Policy H7 (Student Housing) will help to meet the housing needs of students where there is a proven need and Policy H8 (Houses in Multiple Occupation) will help to control the number of houses which are in multiple occupation in order to control issues of overcrowding. Policy H9 will support those requiring older persons specialist accommodation. The implementation of Policy H10 would help improve affordability across the housing market in York. These policies have been assessed as having a significant positive effect on SA Objective 1 (Housing). For Policy H4 (Promoting Self and Custom House Build) a significant positive effect has been recorded on the SA Objective 1 on the basis that the policy supports appropriate proposals where they conform with other policies and requires the provision of at least 5% of all new dwelling plots on strategic sites to be made available for custom/self-build where demand is identified. It has been concluded that the policy will make a significant contribution to meeting these housing needs.
- 6.6.17 The implementation of the housing policies will result in the delivery of good quality housing comprising a mix of housing types. The housing policies have been appraised as having a significant positive effect against SA Objective 2 (Health) on the basis that living in the right type and quality of housing is considered to have significant positive health benefits. The safeguarding and provision of sites for pitches to meet the future needs of Gypsy, Roma, Traveller and Travelling Showpeople is likely to have positive health benefits for those groups. The delivery of affordable housing providing the community with access to good quality housing is also considered likely to have a significant effect on health.
- 6.6.18 The provision of housing (particularly through Policies H1, H5, H6, H9 and H10) is also expected to have a significant positive effect on SA Objective 5 (Equality and Accessibility). As noted in the appraisal of the Spatial Strategy, the scale and broad location of the housing proposed means that a range of dwellings and community facilities can be provided to meet local needs.
- 6.6.19 The implementation of policies H1, H2, H3, H4 and H7 would help to deliver a significant amount of new housing within York. The scale of development proposed over the Local Plan period would help to create and support construction jobs which accounts for approximately 5% of the total employment across the city. The scale of change would inevitably lead to an increase in traffic generation associated with the new housing. Policy H2 sets out the net densities that housing development will be expected to achieve which identifies that the highest density should be delivered within the City Centre (100 units/hectare) where there are good established public

transport links. These significant changes will bring change to the character of York. New housing development in inappropriate locations or poorly designed could have adverse effects on York's historic environment. However, when considered alongside other policies in the plan, (in particular D1, D4, D7, D10, and D11) it is considered that the development of housing which is in accordance with these policies would help to conserve York's historic environment by ensuring good design and avoiding adverse effects. Accordingly the housing policies have been appraised as having a minor positive effect against SA Objectives 4 (Jobs and Economy), 6 (Travel), 14 (Historic Environment) and 15 (Natural and Built Landscapes). However, there is some uncertainty over these positive effects with relation to Objective 15.

- 6.6.20 Mixed neutral and negative effects have been identified against objective 7 (Greenhouse Gases) on the basis that construction activity and occupancy of new homes is likely to generate an increase in emissions. However, Policy CC1 requires that new developments will be required to incorporate renewable and low carbon sources of energy and energy efficiency. Policy CC2 requires that all new development will be expected to consider the principles of sustainable design and construction and to make carbon savings through reducing energy demand, using energy and other resources efficiently. CC3 will support development of combined heat and power networks. The implementation of these policies would help to ensure that new housing developments are sustainably built, minimise greenhouse gas emissions and to help manage the response to climate change.
- 6.6.21 Positive and negative effects associated with the implementation of Policies H1, H3, H4 and H9 have been recorded against Objective 9 (Land Use) on the basis that approximately 29% of the proposed housing sites are on brownfield land. However the implementation of Policy H2 would help to achieve a good density for residential development ensuring the efficient use of land.

Health and Wellbeing

- 6.6.22 There are clear links between the development of sustainable places and the health and wellbeing of the City of York's population. Policies HW1-HW7 set out the approach to ensuring the provision of suitable facilities and services to support the communities of York. They focus on protecting existing communities (HW1) and providing new facilities (HW2); supporting the provision of sport facilities (HW3); ensuring appropriate childcare provision (HW4); promoting the appropriate development of healthcare services (HW5) and emergency services (HW6), and supporting healthy places through new development (HW7).
- 6.6.23 The policies have been assessed as cumulatively having a significant positive effect on SA Objectives 1 (Housing), 2 (Health) and 5 (Access to Services). The policies are considered to help in support the housing needs of the population by protecting and providing communities facilities that meet the day to day needs of communities (e.g. libraries, post offices, meeting places etc) in accessible locations. The health of York is generally good but pockets of ill health and deprivation exist with a significant proportion of adults and children classed as overweight. By supporting facilities and service provision, the policies are considered to significantly contribute to the health of York's communities and support the delivery of the York Joint Health and Wellbeing Strategy (2017-22). The provision of facilities, such as sporting equipment, in accessible locations also contributes towards healthy lifestyles.
- 6.6.24 The provision of services in reasonable proximity to people's homes will help to ensure that day-to-day requirements and demands can be catered for, particularly for those reliant upon local provision. The requirements of HW2 in delivering accessible services should help to reduce the need to travel. Any reduction in vehicle movements is considered to have benefits in terms of reduced greenhouse gas and vehicle emissions. As a result, the Health and Wellbeing Policies have been appraised as having a minor positive effect on SA Objectives 6 (Travel), 7 (Greenhouse Gases) and 12 (Air Quality). Minor positive effects were also assessed for 14 (Historic Environment) as Policy HW1 is likely to support the protection of spaces that contribute to the historic urban form.
- 6.6.25 No significant or minor negative effects were identified during the appraisal of the health and wellbeing policies. It was considered that there was no direct relationship between Policies HW1-

HW7 on SA Objectives 3 (Education), 4 (Jobs), 10 (Water Efficiency), 11 (Waste), 13 (Flood Risk) and neutral effects on and 15 (Natural and Built Landscape).

Education

- 6.6.26 There is a clear link between York's population and the continuance of a vibrant economy through the working age population. In order to support economic growth, there needs to be a local workforce with the skills, experience and abilities to support businesses. Policies ED1-ED8 focus upon making York a world class centre for education providing the quality and choice of learning and training opportunities to meet the needs of children, young people, adults, families, communities and employers. Policies ED1-ED5 focuses upon supporting appropriate development at the University of York (ED1) and specifically Campus West (ED2) and Campus East (ED3); York St. John University Lord Mayor's Walk Campus (ED4) and York St. John University Further Expansion (ED5). Policies ED6 relates to the provision of sufficient modern preschool, primary and secondary school education. Policy ED7 supports the expansion of further education facilities and Policy ED8 promotes community use of new/extended education facilities.
- 6.6.27 The policies have been assessed as having a significant positive effect upon SA Objectives 1 (Housing), 2 (Health), 3 (Education), 4 (Jobs) and 6 (Travel). The provision of housing for students and staff (ED1, ED4 and ED5) will meet these particular needs and can have beneficial indirect impacts on the local housing market. The provision of appropriate and sufficient education and training opportunities is an important part of the development of an effective workforce. The current educational attainment within York is relatively high providing a pool of skilled labour which fulfils the needs of local businesses. Support for the City's Universities under Policies ED1-5 is considered to be of particular importance in helping to develop and retain a highly qualified workforce. The provision of education and training is considered fundamental to health and well-being, providing an opportunity for the population of York to realise their potential. The opportunity for community access to sports facilities under Policies ED6 and ED8 has also been appraised positively against the health objective. The provision of locally accessible education, recreation and training will provide opportunities to influence patterns of movement which may make an important contribution to minimising travel and travel by car in particular.
- 6.6.28 The implementation of the education policies will help to ensure that there is equality of access to education facilities across the City and appropriate to new and existing local communities. Implementation of the Education Policies therefore has the potential to have a minor positive effect on SA Objectives 5 (Equality) and 9 (Land Use), particularly where new education facilities provide community access thereby reducing the demand for additional facilities. Minor positive effects are also anticipated in relation to SA Objectives 12 on the basis that accessible education facilities which help to minimise a reliance upon travel by car (as outlined above) will make a positive contribution to counter a continued decrease in air quality across the City.
- 6.6.29 Those policies which are directly related to the University Campuses (ED1-ED5) have been appraised positively against Objectives 14 (Historic Environment) and 15 (Natural and Built Environment). The campuses are considered to be integral to the City's character and subject to implementation new development at these campuses can make a positive contribution to sustainable development within the City.
- 6.6.30 Uncertain effects were recorded against SA Objectives 10 (Water Efficiency) and 11 (Waste) on the basis that new development could increase demand for water resources and generate waste arisings associated with construction (and demolition).
- 6.6.31 No significant or minor negative effects were recorded against any of the SA Objectives.

Placemaking, Heritage, Design and Culture

- 6.6.32 The Local Plan identifies that York's built and historic environment is of outstanding quality. The baseline assessment has identified that the City of York is one of only five historic centres in England that has been designated as an Area of Archaeological Importance as the archaeology is of national and international significance. York's wealth of historic assets includes:

- ▶ York Minster, England's largest (surviving) medieval church and the largest Gothic Cathedral in Northern Europe;
- ▶ Well over 2000 individual listed buildings on 1,599 listings of which 71 are Grade 1 and 173 Grade II* listings;
- ▶ 22 scheduled monuments in the city 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;
- ▶ 35 designated Conservation Areas, each of which is covered by Conservation Area Appraisal and have extra controls applied to them so that the character of the area can be preserved and enhanced.

- 6.6.33 The built and historic environment is identified as being central to York's economic success in the past and will continue to be so in the future. This legacy is also an important benchmark when considering the quality of future development in York. Section 8 of the Local Plan provides the policy requirements to help achieve this objective. The policies D1 (Placemaking), D2 (Landscape and Setting), and D11 (Extensions and Alterations to Existing Buildings) clearly set out those requirements expected of development proposals in relation to demonstrating a thorough understanding of York's special qualities its urban structure and grain, density, its skyline and views and the need to sustain the significance of heritage assets. The City of York Council has sought to adopt a positive policy framework through Policies D4 (Conservation Areas) and D5 (Listed Buildings) which identifies that development proposals will be supported where they are designed to enhance the special character and appearance of Conservation Areas and Listed Buildings. The protection of archaeological features (Policy D6), Historic Parks and Gardens (D8) and Non-Designated Historic Assets (D7), which identify the need to assess the significance of development proposals upon these assets, have all been appraised as having a significant positive effect against SA Objectives 14 (Historic Environment) and 15 (Natural and Built Landscape). The need to create high quality shop fronts (Policy D12), appropriate advertisements (Policy D13) and restrictions to security shutters (Policy D14) were also assessed as having a significant positive effect against objectives 14 and 15 by providing policy to help manage relevant development proposals.
- 6.6.34 Policy D1 identifies that development proposals will be supported where they improve poor existing urban and natural environments. The need to consider the ease of public pedestrian and cyclist movement and to establish natural patterns of connectivity was assessed as having a significant positive effect upon Objective 6 (Travel).
- 6.6.35 Policy D2 requires developers to recognise the significance of landscape features and also the interrelationship between good landscape design and biodiversity enhancement. Accordingly the policy is considered to have a significant positive effect upon Objective 8 (Biodiversity).
- 6.6.36 The implementation of Policy D1, through its promotion of good design and promotion of safe pedestrian and cyclist movement which will help to reduce crime and fear of crime will be conducive to encouraging walking and cycling has been recorded as a minor positive effect against Objectives 1 (Housing), 2 (Health) and 7 (Greenhouse Gases). Policy D3 supports the provision of cultural facilities and explicitly promotes access for all. The policy has therefore been recorded as having a minor positive effect against Objective 5 (equality and access).
- 6.6.37 No significant or minor negative effects were identified in the assessment of Policies D1-D13 against the SA Objectives.

Green Infrastructure

- 6.6.38 Policies GI1 to GI7 form the Green Infrastructure Chapter of the Local Plan. Green Infrastructure is the term used for the overarching framework related to all green assets, comprising landscapes, geodiversity, biodiversity and natural environment. The delivery of integrated Green Infrastructure has the potential to yield a range of significant benefits to York with resultant positive assessments against a range of the SA Objectives. The approach adopted to Green Infrastructure by York

involves protecting, enhancing and extending biodiversity habitats and landscapes and also to support multifunctional benefits of Green Infrastructure e.g. promoting opportunities for walking, cycling and equestrian routes with resultant benefits for adaptation to climate change and flood storage as well as enhancing the landscape within the City. The Green Infrastructure Policies have therefore been appraised as having significant positive effects against SA Objectives 2 (Health) due to the opportunity for people to engage actively within these open spaces, but also due to the part these policies will play in helping to improve the City's air quality. The policies will also enhance the environmental quality making a significant contribution to further enhancing the City's image as an attractive place to live, work and visit, in turn benefiting the City's economy to the benefit of its population and their well-being.

- 6.6.39 Policy GI5 identifies that development proposals will not be permitted which would harm the character of, or lead to the loss of open space of environmental and/or recreational importance. Policy GI6 identifies that all residential development will be expected to contribute towards the provision of open space for recreation and amenity on-site. The retention and provision of accessible open space for all residents will help to minimise the need to travel and will form part of an overall strategy to encourage a modal shift towards cycling and walking. This has been appraised as a significant positive effect against Objectives 5 (Equality), 6 (Travel) and 7 (Greenhouse Gases) and 12 (Air Quality). The safeguarding of the City's Green Infrastructure, which is an explicit requirement within Policies GI1-5 has been identified as having a significant positive effect upon SA Objective 9 (Land Use).
- 6.6.40 It is considered that the Green Infrastructure Policies are the centrepiece in realising the aspiration of SA Objective 8 (Green Infrastructure) and as such the policies have been appraised as having a significant positive effect upon this objective. The key test will be upon the effective implementation of these policies to provide genuine connectivity between various open spaces with the resultant opportunities to promote access for health benefits or to facilitate more sustainable modes of travel.
- 6.6.41 Policy GI1 identifies that green infrastructure in the form of Common Land, Village Greens and other local green spaces have an important role to play in protecting and enhancing the historic character of York. Policy GI2 identifies the need to maintain and enhance cultural and historic landscapes, whilst GI3 highlights the need to retain trees or hedges which make a positive contribution to Conservation Areas or to the setting of a Listed Building. Green Infrastructure is considered to be a fundamental part of the historic character of the City. The policies have therefore been identified as having a significant positive effect on Objectives 14 (Historic Environment) and 15 (Natural and Built Environment).
- 6.6.42 The implementation of Policies GI1-7 will facilitate the creation of an attractive setting for new houses and access to natural environments and recreational activities for all residents. The establishment of a Green Infrastructure Network across the City could provide a range of opportunities for the training and tourism opportunities. Cumulative minor positive effects have been identified against SA Objectives 1 (Housing), 3 (Education) and 4 (Employment).
- 6.6.43 No minor or significant negative effects were identified during the appraisal of the Green Infrastructure Policies.

Managing Appropriate Development in the Green Belt

- 6.6.44 The Local Plan creates a Green Belt for York which will assist in preserving and enhancing the special character and setting of York. Policies GB1-GB4 provides the policy framework to deliver this policy objective.
- 6.6.45 York's Green Belt plays a significant role as part of the setting for the City and its overall character, particularly with regard to preserving long-distance views into the City. It is considered that Policies GB1 (Development in the Green Belt) and GB2 (Development in Settlements "Washed Over" by the Green Belt) are able to deliver this objective on a City-wide scale in the short, medium and long term. In light of this, Policies GB1 and GB2 have been appraised as having significant positive effects upon SA Objectives 14 (Historic Environment) and 15 (Natural and Built Landscape). Policy GB3 which identifies the criteria for the reuse of buildings outside of settlement limits within the Green Belt has been appraised as having a minor positive effect against this objective.

- 6.6.46 The Green Belt provides an important recreational and landscape resource for the City's residents, thus contributing to their well-being. The implementation of Policy GB1 which places restrictions upon built development within the Green Belt can help to protect this resource with benefits for health and also biodiversity and land use (SA Objectives 2, 8 and 9). Restrictions on built development will constrain locations for housing development (although Policy GB4 does identify that the development of affordable housing on exception sites may be permissible) and may constrain commercial development formation or expansion. Accordingly, Policy GB1 has been appraised as having minor negative effect on SA Objective 1 (Housing) and a minor negative/uncertain effect on Objective 4 (Employment). However by focusing development within the urban area, particularly through Policy GB1 there is the potential for minor positive effects associated with reducing the need to travel by concentrating homes and services together and as a result reducing greenhouse gas emissions. As a result minor positive effects have been recorded against Objectives 6 (Travel) and 7 (Greenhouse Gases).
- 6.6.47 No significant negative effects were identified during the appraisal of the Green Belt Policies.

Climate Change

- 6.6.48 Chapter 11 of the Local Plan Publication Draft includes three policies which detail how York will tackle the challenges of climate change. The policies are CC1: Renewable and Low Carbon Energy Generation and Storage, CC2: Sustainable Design and Construction of New Development and CC3: District Heating and Combined Heat and Power. Policy CC1 identifies that the generation of renewable and low carbon energy will be supported within the context of sustainable development and responding the climate change. Furthermore new development will be required to incorporate renewable and low carbon sources of energy and energy efficiency whilst proposals for the strategic sites will be required to be accompanied by Energy Masterplans to ensure that the most appropriate technologies are employed.
- 6.6.49 Policy CC2 requires all new development to consider sustainable design and construction and to make carbon savings through reducing energy demand, using energy and other resources efficiently by generating low carbon/renewable energy. Policy CC3 requires all new development to have a connection to combined heat and power networks, or be capable of connecting to these networks.
- 6.6.50 All three policies have been identified as having positive effects on most SA Objectives with those being significant in respect of Objectives 7 (minimising greenhouse gases) and 4 (job creation). These significant positive effects arise from the potential to help contribute to achieving carbon reduction targets of 40% by 2020 and 80% by 2050, as set out within the Climate Change Framework for York. Full implementation of these policies also has the potential to create the conditions within which a City-wide low carbon economy could be created with resultant increase in employment and opportunities within the low carbon sector.
- 6.6.51 The implementation of the policies is likely to result in higher sustainable construction standards leading to improvements within future housing stock and providing opportunities for people to occupy/own energy efficient housing. The requirement for new non-residential buildings to achieve BREEAM 'excellent' will ensure that all new qualifying developments have considered aspects of sustainable location including the proximity of good public transport networks as well as delivering improvements to water efficiency and consumption and waste reduction. Accordingly, Policy CC2 has been appraised as having a minor positive effect on Objectives 1 (housing), 2 (health), 5 (equality), 6 (travel), 10 (water), 11 (waste) and 12 (air quality).
- 6.6.52 No significant or minor negative effects were identified during the appraisal of the Climate Change Policies.

Environmental Quality and Flood Risk

- 6.6.53 Chapter 12 of the Local Plan Publication Draft includes five policies which seek to prevent development which would have an unacceptable impact on air quality (ENV1), pollution (ENV2), contamination (ENV3), flood risk (ENV4) and to promote sustainable drainage (ENV5). The policies

have all been appraised as being broadly positive when assessed against the SA Objectives. The delivery of policies ENV1 and ENV2, which seek to avoid exacerbating air quality and pollution impacts, are considered to have significant positive effects in relation to the health and well-being of York's population. The implementation of emission strategies alongside planning applications will assist in helping to improve air quality consistent with the requirements of Air Quality Management Plans. Policy ENV2 seeks to control development which would result in future occupiers and existing communities being subject to significant adverse environmental impacts such as noise, vibration, odour, emissions/fumes, dust and light which resultant benefits on air quality.

- 6.6.54 In accordance with Part 2a of the Environmental Protection Act 1990, York has a duty to investigate potentially contaminated sites. The implementation of Policy ENV3 will assist in identifying and addressing contaminated land within the City. The remediation of contaminated/brownfield sites has the potential to have a positive effect on human health and potentially features of biodiversity value. The remediation and reuse of brownfield sites also represents an efficient use of land and a means to prevent contaminated surface water being discharged in to local watercourses.
- 6.6.55 As identified within the baseline section there is a well-documented history of flooding from the River Ouse, with the records of flooding in York dating back to 1263. More recently, the Ouse hit the local and national media headlines as a result of widespread flooding in autumn 2000 and high river levels in September 2012. Flood risk is predicted to alter in the future due to climate change and sea level rise. Climate change may result in different rainfall patterns, which could increase the flood risk and as a result of sea level rise the flood risk in the tidal parts of the Ouse catchment area will increase. In accordance with the NPPF, Policy ENV4 requires an assessment of flood risk for development proposals on sites over 1 hectare or in flood zone 2, 3a, 3a(i) and 3b, the policy also requires a flood risk assessment to be submitted with any planning application where flood risk is an issue. Policy ENV5 requires development to restrict surface water run-off through attenuation as a means to prevent pollution and to avoid adverse impacts on water quality. These policies have been assessed as having a significant positive effect on Objective 13 (Flood Risk) whilst policy ENV5 is considered to have a significant positive effect in relation to Objective 10 (Water Efficiency).
- 6.6.56 No significant or minor negative effects were identified during the appraisal of the Environmental Quality and Flood Risk Policies

Waste and Minerals

- 6.6.57 York City Council's waste management strategy involves reducing the amount of waste sent to landfill. Policy WM1: Sustainable Waste Management identifies that sustainable waste management will be promoted through waste prevention, reuse, recycling, composting and energy recovery in accordance with the waste hierarchy. In order to achieve this, the City of York will work with North Yorkshire County Council to manage residual municipal wastes, safeguard existing waste facilities and identifying suitable alternative capacity for municipal and other wastes. The policy will seek to promote the integration of facilities for waste prevention, reuse, recycling, composting and recovery in association with the planning, construction and occupation of new housing, retail and other commercial sites.
- 6.6.58 Policy WM2: Sustainable Minerals Management, requires mineral resources to be safeguarded to reduce the consumption of non-renewable mineral resources by requiring developers adopt good practice in relation to reuse, recycle and disposal of construction materials and through the identification of mineral safeguarding areas. The City Council would only allocate future areas for mineral extraction where there would be no adverse impact on York's heritage and where sites are accessible.
- 6.6.59 Effects associated with both policies have been assessed as broadly positive, particular in relation to reducing waste generation and encouraging recycling and minimising the volume of waste arisings which are sent to landfill with resulting positive effects on health. The control measures to be adopted in defining potential locations for waste or mineral sites will help to ensure that there

are no adverse impacts on the health of the local population, features of biodiversity interest/value or upon the setting of York's built and natural environment.

- 6.6.60 No significant or minor negative effects were identified during the appraisal of the Waste and Minerals Policies.

Transport and Communications

- 6.6.61 Section 14 of the Local Plan Publication Draft contains those policies which relate to transport and communications. The Local Plan Publication Draft identifies that an effective transport network enables people to access work, services, leisure and other facilities in an efficient and safe way. City of York's strategic transport model predicts that the volume of traffic on the highway network overall could increase by approximately 20% (an extra 7,000 vehicle trips in each peak) by the end of the local plan period and could lead to significant increases in congestion and delay. Measures proposed in the draft Local Plan should reduce congestion through improvements to the transport network in key locations and the promotion of alternative modes of transport.
- 6.6.62 Within this context Policies T1-T3 and T5 promote sustainable access through considering the location and layout of new development which includes provision for pedestrians, cyclists which alongside improvements to public transport or accessibility to high frequency bus routes can help to reduce dependence upon private cars. To facilitate this modal change, Policy T2 identifies a series of strategic public transport improvements including the provision of a new railway station at Haxby, measures to improve the operation of bus services in York City Centre, public transport interchange improvements at York Station, and the provision of new, expanded park and ride facilities. Policy T3 focuses upon improvements at York Railway Station which is identified as being the second busiest station in Yorkshire and Humber (after Leeds). Policy T5 identifies a series of short, medium and long term proposals to improve the strategic cycle and pedestrian network across York. Taken together, these policies are considered to have significant positive effects upon SA Objective 6 (Travel). The implementation of these policies along with T7 (Minimising and Accommodating Generated Trips) and T8 (Demand Management) provide for the management and control of car parking spaces and the requirement for travel plans which are essential components of an effective transport strategy which can support behavioural changes and facilitate a modal shift. Such a change provides positive direct and in-direct effects on health, employment, equality, greenhouse gas emissions and air quality.
- 6.6.63 The implementation Policy T9 would help support the consolidation of freight traffic to help manage and co-ordinate delivery vehicles and reduce the number of delivery vehicles entering the city centre whilst support for development of alternative fuel fuelling stations could help support the use of more efficient and less polluting vehicles. This could support economic growth and reduce the number of vehicles entering the city centre. This policy is therefore also recorded as having positive effects on Objective 4 (employment), 6 (travel), and 7 (greenhouse gas emissions).
- 6.6.64 The implementation of Policy T6 which would help to prevent the loss of disused public transport corridors and facilities to allow for the possibility of returning them to their former use or for new uses such as cycle ways, bridleways or wildlife corridors. However, this would not directly help to reduce the need to travel and deliver a sustainable integrated transport network. There would therefore be no significant effects from the implementation of this policy on the travel objective.
- 6.6.65 Conversely, the implementation of policy T4 (Strategic Highway Network Capacity Improvements) could result in an increase in vehicle use, which would be incompatible with the need to reduce travel. However, there is a distinction between measures looking to reduce travel within the city including between new residential areas and new places of employment, and any measures aimed at improving the strategic road network which will include journeys between York and other strategic destinations. Any measures that look to improve intercity movement (such as those providing upgrades/improvements to the A64, A1237 and A19) could increase vehicle movements. There are also implications for other road users from major road/junction improvements and measures to support the use modes of sustainable transport, including through the provision of cycle paths etc, should be considered during the design of highway upgrades/improvements. For

these reasons it is considered that there would be negative effects from the implementation of this policy on the travel objective.

- 6.6.66 Whilst none of the Transport and Communication policies would directly create jobs and deliver growth, maximising the use of sustainable modes of transport and improvements to public transport as set out in Policies T1 and Policies T2 would help to ensure that economic growth is sustainable. These policies would help to ensure that travel associated with any new jobs created are sustainable and can be accommodated within York's integrated transport infrastructure.
- 6.6.67 Policy C1: Communications Infrastructure provides the criteria against which communications infrastructure proposed within York would be supported. The delivery of high quality communications infrastructure is considered to be essential to supporting all facets of modern life, personal and commercial communications. The implementation of this policy which supports the development of new infrastructure where adverse effects will arise is considered to have minor positive effects on SA Objectives relating to education, employment, equality and land use.
- 6.6.68 No significant negative effects were identified during the appraisal of the Transport and Communication Policies. However, minor negative effects were recorded against Policy T4 in relation to the SA Objectives relating to travel, greenhouse gases, land use and air quality.

Delivery and Monitoring

- 6.6.69 The Delivery and Monitoring section contains a single policy; DM1: Infrastructure and Developer Contributions. The Local Plan Publication Draft identifies that developers will be required to provide the infrastructure to service their development and to mitigate any direct local impacts. In addition developers will be required to contribute to the provision of infrastructure necessary to ensure their development achieves wider Local Plan objectives. The infrastructure requirements required through the implementation of the Local Plan will be identified through the Infrastructure Delivery Plan. The adoption of Policy DM1 provides the necessary policy context to secure infrastructure provision which will assist the Local Plan in securing sustainable development in accordance with the vision and outcomes which underpin the Local Plan and will assist in delivering growth across the City whilst meeting the needs of its existing and increasing population. Accordingly Policy DM1 is considered to have a minor positive effect against most of the SA Objectives.

6.7 Cumulative, Synergistic and Indirect Effects

- 6.7.1 In determining the significance of the effects of a plan or programme, the SEA Directive requires that consideration is given to the cumulative, synergistic and indirect nature of the effects. This section considers the potential for the policies and proposals contained within the Local Plan Publication Draft to act in-combination both with each other and other plans and programmes to generate cumulative effects.

Cumulative Effects Arising From the Draft Local Plan

- 6.7.2 **Table 6.4** presents the assessment of the cumulative (and synergistic) effects of the draft Local Plan policies. The cumulative effects of the Local Plan Publication Draft policies (as well as their interaction with other plans and programmes) are difficult to meaningfully or accurately assess. However, our best judgment indicates that all of the SA objectives will experience positive effects as a result of the implementation of the policies contained in the draft Local Plan.
- 6.7.3 Significant positive effects are expected in respect of the following topic areas: health (SA Objective 2); education (SA Objective 3); economy (SA Objective 4); equality and accessibility (SA Objective 5); transport (SA Objective 6); climate change (SA Objective 7); cultural heritage (SA Objective 14); and landscape (SA Objective 15). A mix of significant positive and minor negative effects are expected for housing (SA Objective 1).
- 6.7.4 Effects on SA objectives related to land use (SA Objective 9), water (SA Objective 10), waste (SA Objective 11), air quality (SA Objective 12) and flood risk (SA Objective 13), meanwhile, are likely

to be positive. Effects on biodiversity (SA Objective 8) are largely positive but minor negative effects have also been assessed.

- 6.7.5 Despite the overall positive cumulative effects identified above, some cumulative negative effects on the SA objectives are likely to arise as a result of the implementation of the draft Local Plan. The potential for negative effects has been identified in respect of SA objectives 7 relating to climate change (principally due to increased greenhouse gas emissions associated with housing and economic growth), 9 relating to land use (due to the anticipated loss of greenfield land, including 'best and versatile' agricultural land) and 12 relating to air quality (due to increased emissions to air from vehicle movements).
- 6.7.6 Additionally, negative effects for housing (SA Objective 1) relate to the housing requirement in the Spatial Strategy and Housing chapter not meeting the full need (inclusive of market signals) identified in the SHMA update 2017. However, the presence and extent of such effects would depend on the delivery of housing through the plan period.
- 6.7.7 There are also some aspects of the draft Local Plan where effects are more uncertain. These include biodiversity, water, waste, cultural heritage and landscape (SA Objectives 8, 10, 11, 14 and 15). This principally reflects the uncertainty surrounding the effects of development on these SA objectives that are in part unknown until detailed site development proposals come forward. However, the draft Local Plan includes policies which seek to manage impacts on these assets and in consequence, it is expected that significant adverse effects will be avoided.

Table 6.4 Results of the Cumulative Effects Assessment

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring		
1. Housing	++	++/-	+	++/-	++	++	+	+	0	+	+	0	0	+	++/-	It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective.
2. Health	++	++	+	++	++	++	+	++	+	+	++	+	++	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective. Care must be taken to ensure delivery of facilities in the most appropriate places and the accessibility of urban extensions.
3. Education	+	++	+	0	0	++	0	+	0	0	0	0	+	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
4. Economy	+	++	++	+	0	++	0	+	0	++	0	+	+	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
5. Equality	++	++	++	++	++	+	+	++	+/?	+	+	0	+	+	++	It is anticipated that the policies of the draft Local Plan would have a

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	significant positive effect on the achievement of the SA objective.
6. Transport	++	++/-	++	+	+	++	++	++	+	0	0	+	++	+	++		It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective. However, further development in key locations would generate more traffic which could lead to congestion, particularly within the urban area.
7. Climate Change	++	+/-	+/-	0/-	+	+	0	++	+	++	++	+	++	+/-	++/-		It is anticipated that the policies of the draft Local Plan would have a mixed significant positive and minor negative effect on the achievement of the SA objective. This reflects the policy intent of the draft Local Plan to reduce greenhouse gas emissions (including through locating development in accessible locations that reduce the need to travel, sustainable design, renewable energy generation and the promotion of alternative modes of travel to the car) but that fact that meeting development needs will result in increased greenhouse gas emissions as a result of increased vehicle

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)	
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	movements, increased fuel consumptions and energy use in new dwellings and premises.
8. Biodiversity	++	+/-?	?	0	+	+	++	++	+	0	+	++	0	+	+/-	It is anticipated that the policies of the draft Local Plan would have a mix of positive and negative effects on the achievement of the SA objective, although there is some uncertainty surrounding the effects of development on biodiversity which will be dependent to an extent on the nature of detailed proposals and the outcome of site specific investigation.	
9. Land Use	+	+/-	+	+/-	+	+/?	0	++	+	0	++	+	+	+	+/-	It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on this SA objective. Whilst the policies within the Plan encourage the reuse of previously developed (brownfield) land, development will result in the loss of greenfield land, including 'best and versatile' agricultural land.	
10. Water	+	+	0	0	0	?	0	+	0	+	++	0	0	+	+	It is anticipated that the policies of the draft Local Plan would have a positive effect on the achievement of the SA objective.	

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring		
11. Waste	+	+/-	+	+/-	0	?	+	0	0	+	0	++	0	+	+/-	It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on the achievement of the SA objective.
12. Air Quality	+	+/-	-	-	+	+	0	++	0	+	++	+	++	+/-	+/-	It is anticipated that the policies of the draft Local Plan would have a mixed positive and negative effect on this SA objective. Whilst draft Local Plan policies will help to minimise air quality impacts arising from new development (including through locating development in accessible locations that reduce the need to travel, transport infrastructure improvements and the promotion of alternative modes of travel to the car), development would have negative effects on this objective resulting from the associated increase in vehicle use. This may be exacerbated in the City where some areas already have air quality issues.
13. Flood Risk	++	0/?	0	0	0	0	+	++	+	0	++	+	0	+	+	It is anticipated that the policies of the draft Local Plan would have a positive effect overall on the achievement of the SA objective.

SA Objective	Policy Chapters														Cumulative effect of the draft policies	Commentary on cumulative effects (including secondary and synergistic effects)
	Vision and Development Principles	Spatial Strategy	Economy and Retail	Housing	Health and Wellbeing	Education	Placemaking, Heritage, Design and Culture	Green Infrastructure	Managing Appropriate Development in the Green Belt	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring		
14. Cultural Heritage	++	++/-	?	+	+	+	++	++	++	0	+	+	++	+	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.
15. Landscape	++	++/-	?	+/?	0	+	++	++	++	0	+	+	++	0	++	It is anticipated that the policies of the draft Local Plan would have a significant positive effect on the achievement of the SA objective.

Cumulative Effects Arising from Site Allocations

- 6.7.8 In some parts of the city and surrounding area there are allocated sites in close proximity to each other. If all of the sites in a particular area came forward for development at a broadly similar time, the local area could be subject to cumulative effects which are more significant than if an individual site was developed. The areas which have greatest potential for cumulative effects are those which have multiple allocations within a small area, and particularly those with potentially large housing or employment allocations.
- 6.7.9 The locations identified as having potential cumulative effects include a large area stretching from the A1237 near Huntington in the north-east of York down to the A1036, and beyond around the eastern edge of Heworth and Tang Hall. The upper stretch of this comprises of sites ST8, H46 plus employment site E11 totalling some 1,050 new homes and 3,000m² of employment land. The Heworth and Tang Hall area to the east of the city centre would deliver a further 930 homes through H3 and ST7 also generating significant positive cumulative effects in terms of housing provision.
- 6.7.10 If development of these sites all came forward at the same time, significant benefits would also be expected in terms of availability of affordable homes and potentially enhancing the viability of local facilities such as shops through increased consumer numbers. However, if new services are not also incorporated into the development with appropriate phasing, undue pressure may be placed on existing services such as healthcare facilities or schools, depending on available capacity to expand. A large number of temporary construction jobs may be realised in addition to notable opportunities for the enhancement of trade skills and training in the event of all sites being brought forward. The delivery of multiple new employment spaces would also have a cumulative positive impact on long term employment opportunities for the area.
- 6.7.11 Significant cumulative negative effects may arise due to additional congestion from the large increase in vehicle journeys from the multiple new residential areas and commuters to the new employment sites, however this may be somewhat alleviated if good public transport or cycling facilities are in place. If all sites were developed, there is also the potential for effects on local character if housing areas lose their boundaries and local distinctiveness, plus impacts on the perceived compactness of York where expansion takes place on the edge of existing settlements.
- 6.7.12 Development of multiple sites around this north-east side of York would also result in a large loss in greenfield land with potential cumulative negative impacts on biodiversity through the loss of multiple habitats and green corridors. A wide-scale increase in HGV movements and use of plant and equipment for multiple construction sites would also have a cumulative impact on the release of greenhouse gas emissions. Impacts may also be felt from increased traffic on air quality in the area, particularly in relation to nitrogen oxide deposition on designated conservation sites close to roads. In the longer term, greater pressure may be placed on local water resources through the increase in consumption in the area, resulting in a cumulative negative effect.
- 6.7.13 There is the potential for further cumulative effects due to large developments south-east of the city near Heslington (ST4, ST15 and employment site ST27) with over 4,000 new homes and 24,000 m² employment floorspace, and to the west of the city along the A59 corridor (ST1, ST2 plus employment sites ST19 and E16). The A59 sites would deliver 1,400 houses and 20,400 m² employment floorspace. In these two locations, there would be significant cumulative positive effects relating to the provision of housing and employment opportunities. Development of multiple sites would also generate cumulative negative effects as set out above, most notably through the increased congestion from multiple new housing sites and increased commuter numbers, plus the loss of multiple areas of greenfield land.
- 6.7.14 Groups of sites have also been allocated towards the outskirts of the city and in the surrounding villages. The larger of these include an area south of Strensall (H59, E18, ST35) totalling some 620 new homes and 13,000m² of employment land. Additionally to the east of the city are ST4 and ST27 totalling 211 houses and 21,500m² of employment floorspace. There are also a smaller outlying groups of sites at Elvington (H39 and E9) and Dunnington (H31 and E10). In addition to the cumulative effects already highlighted above, these locations on the edge of the city may

particularly result in wider cumulative effects on the rural setting of the York as well as negative effects on landscape and local views.

- 6.7.15 Clusters of sites are also present within the city centre, one of which comprises housing sites H1, H7, H22, H23, H55, student housing site SH1 plus mixed use site ST5. This cluster would deliver approximately 2,200 new houses in the city centre (and potentially up to 3,000 with full delivery of ST5 York Central site) and 100,000 m² of employment floorspace. South of this group, sites H10 and H52 are in close proximity to each other and represent an additional 200 homes. The cumulative effects would be broadly similar to those set out above in terms of access to housing and affordable homes, additional congestion and impacts on water and greenhouse gases. However, these sites would be developed on brownfield land, so a cumulative significant positive effect on land use in the city centre is anticipated with limited impacts on biodiversity as a result of development.

Cumulative Effects Arising From Other Plans and Programmes

- 6.7.16 The draft Local Plan policies sit within the context of a number of other plans and programmes including those of surrounding local districts and plans and programmes at the county level. These plans and programmes are identified in **Section 3** and reviewed within **Appendix C** and include, for example:
- ▶ Local Transport Plan 3 for North Yorkshire;
 - ▶ Selby Local Plan;
 - ▶ Harrogate Local Plan;
 - ▶ Ryedale Local Plan;
 - ▶ East Riding Local Plan;
 - ▶ Hambleton Local Plan;
 - ▶ City of York Council Housing Strategy;
 - ▶ Sustainable Community Strategy (Without Walls);
 - ▶ York's Economic Strategy;
 - ▶ One Planet York; and
 - ▶ Yorkshire Water Resources Management Plan.
- 6.7.17 The cumulative effects arising from the interaction of the draft Local Plan with other plans and programmes have been considered to ensure that significant cumulative effects on the City of York are considered. No significant negative cumulative effects have been identified, although increased development in York and neighbouring local authorities will be likely to generate adverse effects on SA objectives relating to:
- ▶ Transport, due to increased vehicle movements and associated congestion;
 - ▶ Climate change, as a result of increased greenhouse gas emissions associated with new development;
 - ▶ Air quality, principally due to increased vehicle movements and associated emissions to air;
 - ▶ Land use, reflecting the cumulative loss of greenfield land; and
 - ▶ Waste, due to an anticipated cumulative increase in waste arisings associated with new development.
- 6.7.18 However, effects in this regard could be minimised through the policy measures contained across a number of the emerging/adopted local plans. We also note that, in accordance with the duty to co-

operate, there may be opportunities for authorities to collaborate in responding to these effects through the planning and development of further shared infrastructure and facilities.

7. Monitoring and Next Steps

7.1 Key Conclusions Emerging from the Appraisal

Spatial Strategy

- 7.1.1 The Local Plan will enable York to realise its economic growth ambitions as set out within the York Economic Strategy (2016) with a focus on developing jobs in higher value sectors. The quantum of housing to be accommodated in the City of York (a minimum annual provision of 867 new dwellings over the plan period 2017/18 to 2032/33 and beyond from 2032/33 to 2037/38) will meet the City's projected baseline household growth in this period. However, it may not fully meet the needs identified in the York Strategic Housing Market Assessment (2017 update) as the recommended upward adjustment for 'market signals' in the SHMA has not been applied. The figure also falls short of the Government's consultation housing need figure for the City. This is reflected in the appraisal of the preferred housing figure and higher SHMA 2017 Update reasonable alternative figure (summarized in **Section 6.4**) with the alternative of 953dpa scoring marginally better in sustainability terms than the preferred figure (876dpa) and Government's consultation figure (1,070dpa). York City Centre is to remain the focus for main town centre uses whilst the majority of dwellings in the plan period (89%) are to be located at seventeen strategic housing sites including land adjacent to the existing built up area of York and a new settlement to the south east. The City's remaining housing requirement is to be met at smaller (local) allocations (21 sites comprising a total of 1,497 dwellings).
- 7.1.2 In addition to the employment land provided for as part of the proposed strategic allocations (57.5ha), a further 9.5ha of land is allocated at dedicated employment sites. The provision of this employment land seeks to accommodate around 650 new jobs per annum (around 13,500 new jobs between 2017/18 and 2037/38). This growth figure is reflected in the appraisal of the preferred figure and reasonable alternatives figures (as appraised in **Section 6.4**) with the preferred option scoring marginally better in sustainability terms than the alternatives.
- 7.1.3 The spatial distribution of the sites broadly follows the approach identified at Preferred Options stage (2013) and halted Publication Draft (2014) and taken forward in the Preferred Sites Consultation (2016) and Local Plan Pre-Publication Draft (2017) 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 SA of the Preferred Options Local Plan (2013) 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. This broad conclusion was supported in the Interim SA Report (2016) and Pre-Publication Draft SA Report (2017). No substantive evidence has come forward to change this conclusion, given the need to determine the most appropriate locations to accommodate the future growth.
- 7.1.4 Overall, the policies and proposals that comprise the spatial strategy are together expected to have a significant positive effect on those SA objectives relating to housing (1), education (3) economy (4) and equality and accessibility (5) and transport (6) in particular. This principally reflects the level of housing to be delivered over the plan period and the range and choice of housing land to be provided, and the scale and location of proposed employment land, which is anticipated to support sustainable economic growth, improve prosperity and ensure that York fulfils its role as a key economic driver within both the Leeds City Region and the York and North Yorkshire Local Enterprise Partnership.
- 7.1.5 Development of this scale particularly where this is associated with strategic sites will however, also have negative effects across a number of SA Objectives. As noted above, SS1 is likely to lead negative effects on housing (SA Objective 1) in the long term. However, the presence and extent of this negative effect is dependent on delivery on the ground during the plan period. Furthermore, the scale of development within a number of the strategic sites will generate likely negative effects on, in particular, land use (SA Objective 9) with the potential for significant negative effects having been identified where proposed site allocations would result in the loss of the 'best and most

versatile' agricultural land⁸¹. The level of development envisaged and its focus on City Centre locations and larger greenfield urban extensions will also inevitably bring change to the character of the City and its environmental assets. In this respect, the potential for negative (and in some cases significant negative) effects on SA objectives relating to biodiversity (8), cultural heritage (14) and landscape (15) has been identified in respect of a number of strategic and smaller scale (local) allocations.

- 7.1.6 Furthermore, the Habitats Regulations Assessment screening has identified the need for appropriate assessment of Policies SS19, and allocations H59 and E18, which were found to cause a likely significant effect (LSE) alone across a range of factors on the adjacent Strensall Common SAC. Additionally SS13 was found to have a LSE on Lower Derwent Valley SAC, SPA and Ramsar site. However, it should be noted that those policies that comprise the spatial strategy (and other Local Plan Publication Draft policies) specifically seek to conserve and enhance York's historic and natural environment. There is 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. Importantly within the context of managing the effects of growth, the Local Plan also includes commitments on the City's Green Belt. The re-definition of the City's Green Belt (through policies SS2) will also help to re-affirm the role of this policy instrument in helping to protect the overall spatial form of the City and assist in preserving and enhancing the special character and setting of York.
- 7.1.7 Cumulatively, new development of the scale envisaged would result in an increased use of resources, the generation of waste and emissions to air and in consequence, effects on SA objectives relating to (inter-alia) increased resource use (9), waste generation (11), emissions to air (12) and climate change (7) have been assessed as largely negative. Effects on SA objectives related to health (2), education (3), transport (6) and flood risk (13) meanwhile, are considered to be more mixed and are largely dependent on site-specific characteristics. The cumulative effects of development of sites which are in close proximity to each other to minimise the effects will also need to be considered in detail to avoid a concentration of additional demand on local facilities and infrastructure. Phasing of development may be appropriate along with developer contributions to any new facilities in line with Local Plan policy DM1.
- 7.1.8 Consistent with the overall spatial strategy, one new settlement has been identified (Land West of Elvington Road, ST15). The site supports the Local Plan Publication Draft Vision and Spatial Strategy by seeking to create a new sustainable rural community that will help to deliver the housing needs of the City of York. The SA of the Preferred Options Local Plan (2013) and halted Publication Plan (2014) concluded that the strategic site identified, and the policies to support its development, should avoid development in locations that have high biodiversity or recreational value. Changes to the site boundary were consulted on at Pre-Publication Plan stage (2017). The accompanying SA Report at Pre-Publication Plan stage appraised the site similarly to those boundaries presented in the previous Local Plan documents. The HRA has determined that appropriate assessment is required due to the potential for the site to have effects on the Lower Derwent Valley, which is designated as a SAC, SPA and Ramsar site. These effects relate to the non-breeding golden plover and lapwing populations of the SPA which utilise 'functionally-linked' land far beyond the boundaries of the designated site. Some uncertainty therefore remains at this stage and further assessment is required in relation to SA Objective 8. Notwithstanding this, in light of residual effects on the Heslington Tilmire SSSI minor negative effects have been appraised for the linked Strategic Policy SS13 against biodiversity (SA Objective 8).
- 7.1.9 The Council has identified that there were no appropriate alternatives which could deliver a stand-alone settlement without compromising the Spatial Shapers of the City (the character and setting of the City, green infrastructure, flood risk and transport) previously identified and consulted upon through the Core Strategy process and Preferred Options Local Plan. Furthermore, the identification of sites is underpinned by the principle of ensuring deliverability and viability (also noted in Policy SS1). This approach accords with NPPF paragraph 173 which states that pursuing sustainable development requires attention to viability and costs with "competitive returns to a

⁸¹ Defined in Annex 2 of the NPPF as land classified as grades 1, 2 and 3a in accordance with the Agricultural Land Classification System.

willing land owner and willing developer to enable the development to be deliverable.” Whilst there are no other single sites which have been identified or considered to be a viable or deliverable alternative to ST15 (within the context of the NPPF), a combination of other strategic sites could provide the growth equivalent to that proposed. However, no configuration of alternative sites has been determined that would be able to provide the same range and scale of sustainability benefits that the single settlement can provide (the process by which the strategic sites were chosen is set out in **Appendix K** with strategic appraisals in **Appendix I**).

- 7.1.10 The development of individual sites to meet future growth requirements may themselves have a range of positive and negative effects, depending on site size, location, existing character and the nature of proposed development. The selection of the sites proposed in the Local Plan Publication Draft reflect the application of criteria that have embodied the sustainable location principles contained in SS1 (and more broadly the requirements of the NPPF), and in consequence, are collectively considered to reflect the most sustainable way to meet future growth. Where potentially negative effects have been identified, the majority of these could be mitigated through the application of Local Plan Publication Draft policies and at the individual planning application stage, when detailed design and mitigation measures will also be considered (such as site layout, design and access and the incorporation of ecological enhancement measures and Sustainable Drainage Systems (SuDS)).

Draft Local Plan Policies

- 7.1.11 The implementation of the proposed policies contained in the Local Plan Publication Draft is anticipated to have a cumulatively positive effect on the SA objectives. Significant positive effects are expected in respect of the following topic areas and associated SA Objectives: housing (1); health (2); economy (4); equality and accessibility (5); transport (6); climate change (7); cultural heritage (14); and landscape (15). Effects on SA objectives related to education (3), land use (9), water (10), waste (11), air quality (12) and flood risk (13), meanwhile, are also likely to be positive whilst there are a mix of positive and negative effects on biodiversity (8).
- 7.1.12 Notwithstanding, for those policies that promote/make provision for new development some negative effects on the SA objectives can be expected. In this context, the potential for negative effects has been identified in respect of SA objectives relating to climate change (7), land use (9) and air quality (12). Where negative effects have been identified, mitigation measures have been proposed, which include the application of other policies within the plan concerning for example, biodiversity (8), air pollution (12), flood risk (14), sustainable design and heritage (14).

Key Recommendations and Proposed Mitigation Emerging from the Appraisal

- 7.1.13 The SA of the Local Plan is an ongoing and iterative process and the Council has sought to address recommendations arising from previous appraisal work in current Local Plan Publication Draft. The appraisal presented in this report has identified some areas where the performance of the Local Plan policies against the SA objectives could be enhanced. These are as follows:
- ▶ **There is potential to revise policies EC4 and EC5** to include specific references to policies relating to placemaking, heritage, design and culture to help ensure that tourism related development and rural economic development does not adversely impact on the historic environment of York.
 - ▶ **It is recommended that WM1 be amended** to include a requirement to enhance the natural environment through new habitat creation/planting/greenspace or through biodiversity offsetting. In addition it is recommended that this policy reference flood risk as a consideration when determining planning applications for waste facilities.

Additionally:

- ▶ **It is recommended that the Council review the housing figure in light of any revisions to the Government’s housing need assessment methodology and publication of new national policy following consultation.** This could be used to review whether there is a

more informed and up-to-date basis from which to determine housing need, consistent with the requirements of the NPPF.

Furthermore, any other changes to the evidence base as well as consultation feedback should be reflected.

- 7.1.14 The Council will give consideration to these suggestions prior to finalisation of the Local Plan, it is not bound to accept them but will need to comment on whether or not a recommendation was accepted or rejected and why that was the case at the time the plan is adopted.
- 7.1.15 Mitigation of a range of effects has been identified through the collective provision of the Local Plan Publication Draft policies; however, in some instances, there are uncertainties at this stage, arising from a lack of detail regarding individual development proposals (much of which will only be known at the planning application stage). In these instances, further assessment of the individual development proposals as part of the planning application process will seek to clarify and then avoid, minimise or mitigate any likely significant effects identified, consistent with the policies of the Local Plan.
- 7.1.16 With regard to cumulative effects, further consideration may need to be given to the phasing of development of sites in close proximity to each other to minimise the effects of an excessive concentration of additional demand on existing facilities and infrastructure. Conversely, where such effects are identified and phasing of development is not an option available to the Council, the collective contribution from each development to the new demand may need to be considered in order to determine an equitable distribution of responsibility and contribution to any new facilities in line with Local Plan policy DM1.
- 7.1.17 Specific mitigation measures have been identified in relation to policies and proposed allocations. These are identified within the individual appraisal matrices.

7.2 Monitoring

- 7.2.1 It is a requirement of SA to establish how the significant sustainability effects of implementing the draft Local Plan will be monitored. However, as ODPM Guidance (ODPM, 2005) and Planning Practice Guidance (2014) notes, it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, it is considered that monitoring needs to be focused on significant sustainability effects.
- 7.2.2 Monitoring the adopted Local Plan for sustainability effects can help to answer questions such as:
- ▶ Were the SA's predictions of sustainability effects accurate?
 - ▶ Is the Local Plan contributing to the achievement of desired SA objectives?
 - ▶ Are mitigation measures performing as well as expected?
 - ▶ Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?
- 7.2.3 Monitoring should be focussed on:
- ▶ Significant sustainability effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused;
 - ▶ Significant effects where there was uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be undertaken; and
 - ▶ Where there is the potential for effects to occur on sensitive environmental receptors.
- 7.2.4 **Appendix L** identifies a number of potential indicators that could be used for monitoring the sustainability impacts of the Local Plan Publication Draft. The indicators used originate from the following sources:

- ▶ Former MHCLG Core Indicators (still used to inform the Authority's Monitoring Report);
- ▶ Local Indicators (monitored for the Local Plan AMR and within CYC departments); and
- ▶ National Statistics.

7.2.5 City of York Council produces a Monitoring Report in April each year. This report contains both City-wide and local level data which could be used to monitor the effects against a number of SA objectives (including a number of those above). Following royal assent of the Localism Act (2011), Local Authorities are no longer required to report on the former National Core Output Indicators and submit this report to Government. However, there is still a duty to monitor development and this annual report (now known as the Authority's Monitoring Report) provides the best basis on which to monitor sustainability effects of the Local Plan.

7.3 Next Steps

7.3.1 The City of York have published the Local Plan Publication Draft to enable formal representations to be made on its content by interested parties in accordance with the regulations, prior to submission of the draft Local Plan to the Secretary of State for examination. This SA Report is also being made available alongside the Publication Draft. The responses to this report will be taken into account when undertaking the next stages of the SA and in finalising the Local Plan prior to submission.

Appendices

- Appendix A Quality Assurance Checklist
- Appendix B Schedule of Responses Received to the Local Plan Preferred Options SA Report
- Appendix C Review of Plans and Programmes
- Appendix D Baseline Analysis
- Appendix E Appraisal of Development Principles
- Appendix F Appraisal of Spatial Strategy Policies
- Appendix G Summary of Site Selection Methodology
- Appendix H Appraisal of Allocations and Alternatives
- Appendix I Appraisal of Strategic Sites
- Appendix J Appraisal of Thematic Local Plan Policies
- Appendix K Policy and Site Audit Trail
- Appendix L Possible Monitoring Indicators
- Appendix M Implications for SA from the changes to policies in the Publication Plan 2014 and Pre-Publication Plan Draft 2017
- Appendix N Housing and employment growth figures appraisal

