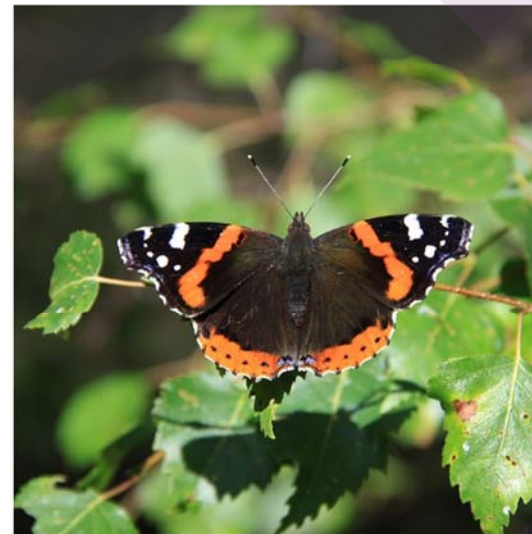




# CITY OF YORK LOCAL PLAN Sustainability Appraisal Addendum April 2018

## City of York Local Plan - Sustainability Appraisal

City of York Local Plan  
Publication Draft (Regulation 19  
Consultation) Sustainability  
Appraisal Report Addendum



**wood.**


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# Non-technical summary

## Purpose of this report

This Non-Technical Summary (NTS) provides an overview of the Addendum to the City of York Local Plan Publication Draft (Regulation 19 Consultation): Sustainability Appraisal (SA) Report (February 2018). The Council, with support from Wood Environment and Infrastructure Solutions UK Ltd (Wood<sup>1</sup>), undertook a Sustainability Appraisal (SA) of the Local Plan Publication Draft (Regulation 19 Consultation) to help integrate sustainable development into the emerging Local Plan. Following publication, the City of York published the Habitats Regulation Assessment (HRA) (April 2018) and completed an air quality study (April 2018) into the effects of emissions from additional road traffic arising from the future planned growth on designated ecological sites. Following the completion of the HRA (April 2018), the City of York has proposed a small number of minor amendments to Local Plan wording to reflect the conclusions of the HRA. The purpose of this report is to ensure that where relevant, the SA has been updated to reflect the outcomes of the HRA and air quality study, and to consider the proposed minor planning policy changes made in response to the findings of the HRA within the context of the requirements for SA.

The following sections of this NTS:

- provide an overview of the City of York Local Plan Publication Draft;
- summarise the key outcomes of the HRA (April 2018) and air quality modelling study (April 2018);
- describe the proposed policy and site changes in response to the HRA and air quality study;
- describe the approach to undertaking the SA of the Local Plan Publication Draft;
- summarise the findings of the screening of proposed minor amendments and evidence; and
- set out the next steps.

## 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. The draft Local Plan includes the following key parts:

- Vision and Outcomes;
- Key Development Principles;
- Spatial Strategy (including strategic and local sites); and
- Thematic Policies.

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

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<sup>1</sup> Formally Amec Foster Wheeler Environment and Infrastructure UK Ltd. The parent company Amec Foster Wheeler Plc was acquired by John Wood Group Plc in October 2017 and the company Wood Environment and Infrastructure Solutions UK Ltd came into effect on 16th April.

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 revised the emerging plan in light of consultation responses and further technical work and made the Local Plan Publication Draft available for representations on its content between 21<sup>st</sup> February and 4<sup>th</sup> April 2018. The City of York Council has proposed a small number of changes to the Plan following the update of the HRA (2018) prior to submission.

This Report should be read in conjunction with the City of York Local Plan Publication Draft (Regulation 19 Consultation): Sustainability Appraisal (SA) Report (February 2018)

## Update of the Publication Plan HRA and air quality modelling study

The SA Report (Feb 2018) recognised that the Habitats Regulations Assessment (HRA) had not been finalised and therefore identified that there was some uncertainty regarding likely significant effects (LSE) on designated European conservation sites from some of the proposed policies (Policies SS13 and SS19) and site allocations (ST15, ST35, H59, E18).

Since publication of the Local Plan in February 2018, CYC has updated the HRA of the Publication Plan (April 2018)<sup>2</sup>. The HRA (April 2018) has concluded that for policies SS13 and SS18 and for sites ST15 and ST33, LSE cannot be ruled out for a range of possible but credible impacts regarding mobile species and recreational pressure on Lower Derwent Valley SPA. For policy SS19 and sites ST35, H59 and E18, LSE cannot be ruled out regarding recreation pressure, changes to the hydrological regime and the effect of air pollution on the adjacent Strensall Common SAC. However, following Appropriate Assessment, through a small number of proposed minor amendments to policy it was found that the effects on mobile species and from recreational pressure could be mitigated for both sites. Furthermore, mitigating circumstances meant that there were no adverse effects on the integrity of Strensall Common SAC. The HRA concluded that there are no adverse effects on the integrity of any European sites.

The updated HRA (April 2018), and its key conclusion, is a key part of the evidence base and directly linked to the SA in terms of the SA's assessment of the effects of the Plan's policies and proposals on achievement the SA Objective 8 (biodiversity). This Report reflects on the outcomes of the updated HRA (April 2018) and its implications for the appraisal presented in the SA Report (Feb 2018).

To inform the updated HRA (April 2018), CYC has also completed air quality modelling for effects of emissions from road traffic arising from the additional planned development on ecological sites. The air quality study is contained as an annex to the HRA<sup>3</sup>. The air quality study determined that effects on designated conservation sites from Nitrogen Dioxide (NO<sub>x</sub>) and nitrogen deposition are insignificant (with the exception of Strensall Common SAC).

## Proposed minor amendments to policies and sites

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<sup>2</sup> Waterman Infrastructure & Environment Limited for City of York council (April 2018) HRA of the Local Plan - Habitats Regulations Assessment of the City of York Council Local Plan

<sup>3</sup> Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Modelling Assessment

The proposed minor amendments to the Local Plan Publication Draft following the update to the HRA (April 2018) are summarised in **Table NTS1** below. Please see **Appendix A** for the full wording of the changes.

Table NTS 1 Summary of proposed minor amendments to policies and sites

Policy	Site	Proposed amendment summary
SS13	ST15 Land West of Elvington Lane	Proposed change outlines cross reference to where the proposed open space to support site ST15 is set out within the Local Plan.
SS18	ST33 Station Yard, Wheldrake	Proposed change expands criterion iv) to promote the use of other sites less sensitive than Lower Derwent Valley SPA and promote good visitor behaviour when visiting the site.
SS19	ST35 Queen Elizabeth Barracks, Strensall	Proposed change expands criterion ii) to ensure suitable visitor behaviour on Strensall Common SAC through the introduction of a wardening service.
H1	Housing Allocations	Proposed changes suggests addition of footnote to cross reference that Policies SS19 (with regards to mitigating impacts on Strensall Common SAC) and Policy GI2 must be taken account for site H59.
EC1	Provision of Employment Land	Proposed changes suggests addition of footnote to cross reference that Policies SS19 (with regards to mitigating impacts on Strensall Common SAC) and GI2 must be taken account for site E18.

## What is Sustainability Appraisal?

National planning policy<sup>4</sup> 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 Plan<sup>5</sup>. 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 Directive<sup>6</sup> and related UK regulations<sup>7</sup> 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.

## How have the proposed minor amendments been appraised?

A SA Framework has been developed to complete the appraisal of the emerging Local Plan. 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 2**.

This SA addendum relates to the update of the HRA rather than in necessary response to representations received. In so far as the HRA recommends some minor changes to policy, these are not considered to be significant for the purposes of the appraisal. None of the proposed minor amendments seek the addition or

<sup>4</sup> See paragraph 150-151 of the National Planning Policy Framework (Department for Communities and Local Government, 2012).

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

<sup>6</sup> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations 2004 (statutory instrument 2004 No. 1633).

deletion of sites or seek to amend site boundaries. However they have been considered in any event: see **Appendix A** for a full analysis. Where the HRA has led to updates in the appraisal this is identified in **Appendix B** and is summarised in **Section 4**. Consequential revisions to the policy appraisal matrices from the SA Report (Feb 2018) are presented in **Appendix C**. Where the revision to matrices requires the removal of text this is indicated using strikethrough, where new text has been added this is underlined. Similarly where the score has been amended on a matrix this is also indicated using strikethrough for the previous score and underlining for the new score. The outcome of this is summarised in **Section 4**.

Due to the limited extent of the proposed minor amendments and focus on the outcomes of the HRA and air quality modelling for the purposes of this Report only consideration of effects against SA Objective 8 (biodiversity) has been presented. The proposed minor amendments were not considered to be relevant to any other SA objectives. The specific nature of the air quality modelling study (being focused on specific roads and concentrations of NOx within 200m of European designated conservation sites and SSSIs) does not inform an understanding of air quality changes in residential areas, or on other sensitive receptors in the community (considered under SA objective 12). Similarly, as the study relates to specific points in the transport network and traffic on ecological sites it is not considered to have an effect in relation to promoting access to services or reducing the need to travel (SA Objective 5 and 6 respectively).

Table NTS 2 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 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 3**. This scoring has been used where changes to the appraisal in the



SA Report (Feb 2018) have been identified in **Appendix A** (with appraisals contained in **Appendix B**, **Appendix C** and **Appendix D**).

Table NTS 3 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.
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 2.3**). 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. The updated appraisal matrices for the relevant strategic sites (ST15, ST33 and ST35) for consideration of effects against SA Objective 8 are presented in **Appendix B**.

## What are the findings of the Report?

The screening has found that the proposed minor amendments to the Local Plan provide clarifications and cross references to ensure that the outcomes of the HRA (April 2018) are incorporated into policy. The proposed minor changes were screened and for some, it was considered likely that there could be significant effects as a result of the changes and in consequence were therefore subjected to reappraisal.

### Strategic sites

With regard to strategic sites ST13, ST33 and ST35, no changes have been recorded in the scoring of effects identified in the appraisal presented in the SA Report (Feb 2018). However, commentary for the sites has been revised to reflect the outcome of the HRA (2018) and the conclusion that no adverse effects on the integrity of any European site would arise. See **Section 4.2** and **Appendix B**.

### Local housing and employment sites

No changes were recorded for the SA Report (2018) appraisal of sites H59 and E18 having 'significant negative' effects (as a function of the site appraisal scoring system). However, the updated HRA (April 2018) helps to remove uncertainty with regards to whether the significant negative effects on European sites can be mitigated. See **Section 4.3**.

## Spatial Strategy policies

The outcomes of the updated HRA (April 2018) have led to a reappraisal of policies SS13 and SS19, with specific regards to the uncertainties at the time of the SA Report (Feb 2018). With the removal of some uncertainties following Appropriate Assessment, SS13 has been appraised as having a 'minor negative' effect on SA Objective 8 (biodiversity) whilst SS19 has been identified as having a mix of 'minor positive/negative' effects. A reappraisal of SS18 has not been required in light of the proposed minor amendments although the HRA (2018) has been used to update the accompanying appraisal commentary. The outcomes are presented in **Section 4.4** and **Appendix C**.

## Thematic policies

The outcomes of the updated HRA (April 2018) have led to a reappraisal of Policy EC1 with specific regards to the uncertainties at the time of the SA Report. The reappraisal has found 'neutral' effects against SA Objective 8 (biodiversity). A reappraisal of Policy H1 has not been required in light of the proposed minor amendments although the HRA (April 2018) has been used to update the accompanying appraisal commentary. See **Section 4.5** and **Appendix C**.

## Cumulative effects

No overall effects on the SA Objectives have been identified following the review. With regards to the air quality monitoring evidence relating to the effects of additional road traffic generated from the proposed development on ecological sites, it is considered that no further appraisal is required at the present time for cumulative effects. Nitrogen Dioxide (NO<sub>x</sub>) and nitrogen deposition are identified as being insignificant across all ecological sites including SSSIs screened into the HRA (NB the HRA concludes that there are no adverse effects on the integrity of Strensall Common SAC). In the case of Strensall Common SAC and Fulford Ings SSSI which was recognised as having effects in the study, due to the nature of the affected area of the site and the wider context, both are not considered significant. See **Section 4.6** and **Appendix D**.

## Next steps

The City of York expect to submit the Local Plan to the Secretary of State for examination by an independent Planning Inspector by the end of May 2018.

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# 1. Introduction

## 1.1 Overview

- 1.1.1 The City of York Council (CYC) 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 published 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 Wood Environment and Infrastructure Solutions UK Ltd<sup>8</sup> (Wood), undertook a Sustainability Appraisal (SA) of the Local Plan Publication Draft and published a SA Report alongside the consultation Local Plan in February 2018<sup>9</sup> (from here on referenced as the SA Report (Feb 2018)). The SA appraised 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 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 were also identified.
- 1.1.3 The SA Report (Feb 2018) recognised that the Habitats Regulations Assessment (HRA) had not been finalised and therefore identified that there was some uncertainty regarding likely significant effects on designated European conservation sites from some of the proposed policies (Policies SS13 and SS19) and site allocations (ST15, ST35, H59, E18). Since publication of the Local Plan in February 2018, CYC has updated the HRA for the Publication Plan (April 2018)<sup>10</sup>, and following Appropriate Assessment and the identification of mitigation, has concluded there would be no adverse effect on the integrity of any European sites from the policies of the Local Plan. The updated HRA (April 2018), and its key conclusion, is a key part of the evidence base and directly linked to the SA in terms of the SA's assessment of the effects of the Plan's policies and proposals on achievement of the SA Objective 8 (biodiversity). This Report reflects on the outcomes of the HRA (April 2018) and its implications for the appraisal presented in the SA Report (Feb 2018).
- 1.1.4 To inform the HRA (April 2018), CYC has also completed air quality modelling for effects of emissions from road traffic arising from the additional planned development on ecological sites. The air quality study is contained as an annex to the HRA (April 2018)<sup>11</sup>. The air quality study determined that effects on designated conservation sites from Nitrogen Dioxide (NO<sub>x</sub>) and nitrogen deposition. These effects were identified as being insignificant across all ecological sites including SSSIs screened into the HRA (NB the HRA concludes that there are no adverse effects on the integrity of Strensall Common SAC). Effects on Fulford Ings SSSI are not considered to be significant.

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<sup>8</sup> Formally Amec Foster Wheeler Environment and Infrastructure UK Ltd. The parent company Amec Foster Wheeler Plc was acquired by John Wood Group Plc in October 2017 and the company Wood Environment and Infrastructure Solutions UK Ltd came into effect on 16<sup>th</sup> April.

<sup>9</sup> Amec Foster Wheeler and City of York Council (February 2018) City of York Local Plan Publication Draft (Regulation 19 Consultation) Sustainability Appraisal Report

<sup>10</sup> Waterman Infrastructure & Environment Limited for City of York council (April 2018) HRA of Plan Allocations - Habitats Regulations Assessment of the City of York Council Local Plan

<sup>11</sup> Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Habitats Regulations Assessment: Air Quality Modelling Assessment

- 1.1.5 A small number of minor changes have been proposed to the plan to ensure the mitigation identified in the HRA is included in the Local Plan. This Report screens these proposed changes for significant effects (within the context of the SA) whilst also addressing the implications for the appraisal following the update of the HRA (April 2018). Where appropriate updated appraisal matrices have been included.
- 1.1.6 The Report provides an update to the SA Report (Feb 2018) addressing the policy and site changes made in response to the update of the HRA (April 2018) and additional air quality modelling evidence (April 2018) and should be read alongside the SA Report (Feb 2018).

## 1.2 Background

- 1.2.1 The Local Plan Publication Draft 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 planning for future growth. It was developed taking into account national planning policy and guidance, the objectives of other plans and programmes, assessment (including SA), the findings of evidence base and technical studies, and the outcomes of engagement.
- 1.2.2 The City of York Local Plan has been in preparation since 2005, when work was started on preparation of the 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.
- 1.2.3 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 (2013), Evidence on Housing Requirement in York (2013, 2014), the North Yorkshire Strategic Housing Market Assessment (SHMA) (2014) 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.
- 1.2.4 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 leading to a refinement of the preferred portfolio of site allocations. The Council undertook a Preferred Sites consultation in 2016 to reflect the revised housing and employment growth and site assessments.
- 1.2.5 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.

- 1.2.6 The Local Plan Publication Draft, which took into account the comments received to the previous stages, SA and the latest technical work, was published for formal representations in February 2018. The proposed strategic approach, alongside proposed housing and employment allocations and plan policies set out in the Local Plan Publication Draft were the subject of the SA Report (Feb 2018) published alongside the Local Plan itself.
- 1.2.7 Following the update of the Habitats Regulations Assessment (HRA) (April 2018) and its conclusion that there are no adverse effects on the integrity of European sites, the Council are proposing a small number of minor changes to the Local Plan prior to submission the Plan to the Secretary of State for examination by an independent Planning Inspector (due by the end of May 2018). The implications for SA emerging from the HRA conclusions and associated proposed changes are the subject of this report.
- 1.2.8 A full overview of the development of the Local Plan and the SA undertaken at each stage is set out in Section 2 of the SA Report (Feb 2018).

### 1.3 The proposed minor amendments

- 1.3.1 The proposed changes to the Local Plan Publication Draft are summarised in **Table 1.1** below. Please see **Appendix A** for the full wording of the changes.

Table 1.1 Summary of proposed minor amendments to policies and sites

Policy	Site	Proposed amendment to wording
SS13	ST15 Land West of Elvington Lane	Proposed change outlines cross reference to where the proposed open space to support site ST15 is set out within the Local Plan.
SS18	ST33 Station Yard, Wheldrake	Proposed change expands criterion iv) to promote the use of other sites less sensitive than Lower Derwent Valley SPA and promote good visitor behaviour when visiting the site.
SS19	ST35 Queen Elizabeth Barracks, Strensall	Proposed change expands criterion ii) to ensure suitable visitor behaviour on Strensall Common SAC through the introduction of a wardening service.
H1	Housing Allocations	Proposed changes suggests addition of footnote to cross reference that Policies SS19 (with regards to mitigating impacts on Strensall Common SAC) and Policy GI2 must be taken account for site H59.
EC1	Provision of Employment Land	Proposed changes suggests addition of footnote to cross reference that Policies SS19 (with regards to mitigating impacts on Strensall Common SAC) and GI2 must be taken account for site E18.

### 1.4 The requirement for Sustainability Appraisal

- 1.4.1 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).

- 1.4.2 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.”
- 1.4.3 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:
- 1.4.4 “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.”
- 1.4.5 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.
- 1.4.6 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.

### Sustainability Appraisal of the draft City of York Local Plan

- 1.4.7 SA has been an integral part of the preparation of the draft Local Plan with each stage of the Plan’s development having been accompanied by a SA, as follows:
- 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)<sup>12</sup>;

<sup>12</sup> The publication draft was not published for consultation following a motion carried at full Council to halt proceeding to consultation on its contents in favour of further evidence base work.



- Preferred Sites Consultation (2016);
- Local Plan Pre-Publication Draft (Regulation 18 Consultation) (2017); and
- Local Plan Publication Draft (Regulation 19 Consultation) (2018).

A full overview of the outcomes of the SA undertaken at each stage of the Local Plan preparation is set out in Section 2 of the SA Report (Feb 2018).

1.4.8 The SA Report accompanying the Local Plan Publication Draft was prepared to meet the reporting requirements of the SEA Directive and assessed:

- the City's vision, plan outcomes and key development principles;
- the preferred development option (including an individual appraisal of strategic and general site allocations) and reasonable alternatives;
- proposed policies; and
- the cumulative, synergistic and secondary effects of the draft Local Plan, both alone and in combination with other plans and programmes.

## 1.5 Purpose of this report

1.5.1 The SA Report (Feb 2018) recognised that the HRA had not been finalised and that there was some uncertainty with regards to effects on designated European nature conservation sites from proposed policies SS13 and SS19 and site allocations ST15, ST35, H59 and E18. The purpose of this report is to ensure that where relevant, the SA has been updated to reflect the outcomes of the HRA (April 2018) and air quality study, and to consider the proposed minor planning policy changes made in response to the findings of the HRA within the context of the requirements for SA (including the SEA Directive).

1.5.2 The SA and HRA are separate assessments with distinct methodologies. The role of SA is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve a range of environmental, economic and social SA objectives identified as important to the City. The SA establishes whether there are likely to be any significant effects (both positive and negative) against a range of SA objectives. Where negative effects are identified, measures are proposed to avoid, minimise or mitigate such effects. The role of the HRA is to test the impact of the proposed policies and allocations on the internationally important (European) sites designated for their biodiversity in and around the City (European sites are Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites). The HRA determines whether the emerging local plan may have likely significant effects (LSE) on the achievement of the conservation objectives of the European sites. Where LSEs can be ruled out, a plan may be adopted. If they cannot be ruled out, the plan must be subjected to greater scrutiny within the HRA (known as 'appropriate assessment') to find out if the plan will have an adverse effect on the integrity of the European sites.

## 1.6 Structure of this addendum

1.6.1 This report contains the following sections:

- Section 2 sets out the overall SA approach;
- Section 3 sets out the findings of the HRA and the air quality modelling evidence;
- Section 4 sets out the appraisal of effects; and

- Section 5 concludes the report.

## 2. Sustainability Appraisal approach

### 2.1 Introduction

- 2.1.1 This section describes the approach to the SA, including how any proposed minor changes to policies have then been appraised.
- 2.1.2 National Planning Practice Guidance (Reference ID: 11-021-20140306) states that the sustainability appraisal report will not necessarily have to be amended if the Local Plan is modified following responses to consultations. Modifications should be considered only where appropriate and proportionate to the level of change being made to the Local Plan. Further assessment may be required if the changes are likely to give rise to significant effects.
- 2.1.3 This SA addendum relates to the update of the HRA rather than in necessary response to representations received. In so far as the HRA recommends some minor changes to policy, these are not considered to be significant for the purposes of the appraisal. None of the proposed changes seek the addition or deletion of sites or seek to amend site boundaries. However they have been considered in any event: see **Appendix A** for a full analysis. Where the HRA has led to updates in the appraisal this is identified in **Appendix B** and is summarised in **Section 4**. Consequential revisions to the policy appraisal matrices from the SA Report (Feb 2018) are presented in **Appendix C**. Where the revision to matrices requires the removal of text this is indicated using strikethrough, where new text has been added this is underlined. Similarly where the score has been amended on a matrix this is also indicated using strikethrough for the previous score and underlining for the new score. The outcome of this is summarised in **Section 4**.

### 2.2 SA Framework

- 2.2.1 The SA Framework comprises sustainability objectives and guide questions to inform the appraisal of effects of the plan's policies and proposals. Establishing appropriate SA objectives and guide questions is central to appraising the sustainability effects of the Local Plan. 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 emerging Local Plan has been appraised.
- 2.2.2 **Table 2.1** 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, the key sustainability issues identified through the analysis of York's socio-economic and environmental baseline conditions 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.
- 2.2.3 The SA objectives used for this appraisal are consistent with those developed to appraise the draft Local Plan and were consulted on in the 2013 Scoping Report. The appraisal objectives reflect an analysis of baseline conditions, review of plans and programmes and the subsequent identification of key sustainability issues which are contained in the SA Report (Feb 2018).
- 2.2.4 Due to the narrow focus of the proposed changes at this stage, this report solely focuses on the appraisal of policies/sites against SA Objective 8 (biodiversity). It is considered that the proposed changes focus consideration of effects solely on this objective and do not have an effect on the achievement of the other SA objectives. The specific nature of the air quality modelling study (being focused on specific roads and concentrations of NO<sub>x</sub> within 200m of European designated

conservation sites and SSSIs) does not inform an understanding of air quality changes in residential areas, or on other sensitive receptors in the community (considered under SA objective 12). Similarly, as the study relates to specific points in the transport network and traffic on ecological sites it is not considered to have an effect in relation to promoting access to services or reducing the need to travel (SA Objective 5 and 6 respectively).

Table 2.1 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"> <li>• Deliver homes to meet the needs of the population in terms of quantity, quality</li> <li>• Promote improvements to the existing and future housing stock</li> <li>• Locate sites in areas of known housing need</li> <li>• Deliver community facilities for the needs of the population</li> <li>• Deliver pitches required for Gypsies and Travellers and Showpeople</li> </ul>	Population
2. Improve the health and wellbeing of York's population	<ul style="list-style-type: none"> <li>• Avoid locating development where environmental circumstances could negatively impact on people's health</li> <li>• Improve access to open space / multi-functional open space</li> <li>• Promotes a healthier lifestyle through access to leisure opportunities (walking /cycling)</li> <li>• Improves access to healthcare</li> <li>• Provides or promotes safety and security for residents</li> <li>• Ensure that land contamination/pollution does not pose unacceptable risks to health</li> </ul>	Population, Human Health
3. Improve education, skills development and training for an effective workforce	<ul style="list-style-type: none"> <li>• Provide good education and training opportunities for all</li> <li>• Support existing higher and further educational establishments for continued success</li> <li>• Provide good quality employment opportunities available to all</li> </ul>	Population
4. Create jobs and deliver growth of a sustainable, low carbon and inclusive economy	<ul style="list-style-type: none"> <li>• Help deliver conditions for business success and investment</li> <li>• Deliver a flexible and relevant workforce for the future</li> <li>• Deliver and promote stable economic growth</li> <li>• Enhance the city centre and its opportunities for business and leisure</li> <li>• Provide the appropriate infrastructure for economic growth</li> <li>• Support existing employment drivers</li> <li>• Promote a low carbon economy</li> </ul>	Population
5. Help deliver equality and access to all	<ul style="list-style-type: none"> <li>• Address existing imbalances of equality, deprivation and exclusion across the city</li> <li>• Provide accessible services and facilities for the local population</li> <li>• Provide affordable housing to meet demand</li> <li>• Help reduce homelessness</li> <li>• Promote the safety and security for people and/or property</li> </ul>	Population, Human Health
6. Reduce the need to travel and deliver a sustainable integrated transport network	<ul style="list-style-type: none"> <li>• Deliver development where it is accessible by public transport, walking and cycling to minimise the use of the car</li> <li>• Deliver transport infrastructure which supports sustainable travel options</li> <li>• Promote sustainable forms of travel</li> </ul>	Air, Climatic Factors

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
	<ul style="list-style-type: none"> <li>• Improve congestion</li> </ul>	
7. To minimise greenhouse gases that cause climate change and deliver a managed response to its effects	<ul style="list-style-type: none"> <li>• Reduce or mitigate greenhouse gas emissions from all sources</li> <li>• Plan or implement adaptation measures for the likely effects of climate change</li> <li>• Provide and develop energy from renewable, low and zero carbon technologies</li> <li>• Promote sustainable design and building materials that manage the future risks and consequences of climate change</li> <li>• Adhere to the principles of the energy hierarchy</li> </ul>	Climatic Factors
8. Conserve or enhance green infrastructure, bio-diversity, geodiversity, flora and fauna for accessible high quality and connected natural environment	<ul style="list-style-type: none"> <li>• Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs</li> <li>• Protect and enhance locally important nature conservation sites (SINCs)</li> <li>• Create new areas or site of bio-diversity / geodiversity value</li> <li>• Improve connectivity of green infrastructure and the natural environment</li> <li>• Provide opportunities for people to access the natural environment</li> </ul>	Biodiversity, Flora & Fauna, Human Health
9. Use land resources efficiently and safeguard their quality	<ul style="list-style-type: none"> <li>• Re-use previously developed land</li> <li>• Prevent pollution contaminating the land and remediate any existing contamination</li> <li>• Safeguard soil quality, including the best and most versatile agricultural land</li> <li>• Protect or enhance allotments</li> <li>• Safeguard mineral resources and encourage their efficient use</li> </ul>	Soil, Material Assets
10. Improve water efficiency and quality	<ul style="list-style-type: none"> <li>• Conserve water resources and quality;</li> <li>• Improve the quality of rivers and groundwaters</li> </ul>	Water
11. Reduce waste generation and increase level of reuse and recycling	<ul style="list-style-type: none"> <li>• Promote reduction, re-use, recovery and recycling of waste</li> <li>• Promote and increase resource efficiency</li> </ul>	Material Assets
12. Improve air quality	<ul style="list-style-type: none"> <li>• Reduce all emissions to air from current activities</li> <li>• Minimise and mitigate emissions to air from new development (including reducing transport emissions through low emission technologies and fuels)</li> <li>• Support the development of city wide low emission infrastructure;</li> <li>• Improve air quality in AQMAs and prevent new designations;</li> <li>• Avoid locating development where it could negatively impact on air quality</li> <li>• Avoid locating development in areas of existing poor air quality where it could result in negative impacts on the health of future occupants/users</li> <li>• Promote sustainable and integrated transport network to minimise the use of the car</li> </ul>	Air, Human Health
13. Minimise flood risk and reduce the impact of flooding to people and property in York	<ul style="list-style-type: none"> <li>• Reduce risk of flooding</li> <li>• Ensure development location and design does not negatively impact on flood risk</li> <li>• Deliver or incorporate through design sustainable urban drainage systems (SUDs)</li> </ul>	Climatic Factors, Water

SA Objective	Guide questions. Will the policy/proposal ...	SEA Directive Topic
14. Conserve or enhance York's historic environment, cultural heritage, character and setting	<ul style="list-style-type: none"> <li>• Preserve or enhance the special character and setting of the historic city</li> <li>• Promote or enhance local culture</li> <li>• Preserve or enhance designated and non-designated heritage assets and their setting</li> <li>• Preserve or enhance those elements which contribute to the 6 Principle Characteristics of the City as identified in the Heritage Topic Paper</li> </ul>	Cultural Heritage, Landscape
15. Protect and enhance York's natural and built landscape	<ul style="list-style-type: none"> <li>• Preserve or enhance the landscape including areas of landscape value</li> <li>• Protect or enhance geologically important sites;</li> <li>• Promote high quality design in context with its urban and rural landscape and in line with the "landscape and Setting" within the Heritage Topic Paper</li> </ul>	Cultural Heritage, Landscape

## 2.3 Appraisal of policies

2.3.1 Where policies have been re-appraised, the following scoring system has been used to appraise the effects against the SA objectives. The scoring system was established in the SA Scoping Report (2013) and has been used to appraise the policies and proposals in the Local Plan as they have developed.

Table 2.2 Scoring system used in the SA of proposed 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)
?	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.

## 2.4 Appraisal of sites

2.4.1 In the SA Report (2018) all proposed site allocations and reasonable alternatives were assessed against the 15 SA objectives using tailored assessment criteria developed in the 2013 Scoping Report, as shown in **Table 2.3**.

2.4.2 Proposed/potential strategic site allocations were 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.

- 2.4.3 The appraisal matrix for each strategic site allocation and the reasonable alternatives not taken forward was contained within SA Report (Feb 2018) Appendix I and summarised in Section 6.5 of that report.
- 2.4.4 Appendix B sets out the update of the appraisal of sites solely against SA Objective 8. The proposed changes were not considered to be relevant to any other SA objectives. The specific nature of the air quality modelling study (being focused on specific roads and concentrations of NO<sub>x</sub> within 200m of European designated conservation sites and SSSIs) does not inform an understanding of air quality changes in residential areas, or on other sensitive receptors in the community (considered under SA objective 12). Similarly, as the study relates to specific points in the transport network and traffic on ecological sites it is not considered to have an effect in relation to promoting access to services or reducing the need to travel (SA Objective 5 and 6 respectively). This review of the appraisal is not linked to changes to the sites themselves (i.e. amendments to boundaries, removal or addition) and reflects the HRA (April 2018) evidence which informed the appraisal.
- 2.4.5 The conclusions of the HRA and scoring of sites within SA are distinct. Whilst HRA (by identifying effects on European sites) informs the scoring in the SA, it is supplemented by consideration of effects on national and local designated conservation sites (such as Sites of Special Scientific Interest (SSSIs) and Site of Interest for Nature Conservation (SINC). In addition, as the approach to the SA of the sites is based on proximity to sensitive receptors or assets and facilities, they are in effect pre-mitigation, and as such are distinct from the HRA assessments (although, as noted above, the HRA has informed scoring where relevant to the consideration of European sites).
- 2.4.6 The detailed assessment of the strategic sites has been undertaken solely by officers of City of York Council.

Table 2.3 Site Assessment Criteria

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring <sup>13</sup>	
	Indicator	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: <ul style="list-style-type: none"> <li>• doctors</li> <li>• open space</li> </ul>	5 5	10	6-10 3-5 1-2 0	++ + - --

<sup>13</sup> 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.

SA Objective	Relevant Assessment Criteria	Maximum score		Indicative SA Scoring <sup>13</sup>	
	Indicator	Per indicator	Total	Points scored	SA Symbol
3: Improve education, skills development and training for an effective workforce	(Housing) Access to: <ul style="list-style-type: none"> <li>nursery provision</li> <li>primary schools</li> <li>secondary schools</li> <li>higher education facilities</li> </ul>	5 5 5 5	20	11 -20 5-10 1-4 0	++ + - --
	(Employment) Access to: <ul style="list-style-type: none"> <li>nursery provision</li> </ul>	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: <ul style="list-style-type: none"> <li>Non-frequent bus routes</li> <li>Frequent bus routes</li> <li>Park and ride bus stops</li> <li>Railway station by walking</li> <li>Railway station by cycling</li> <li>Adopted highways</li> <li>Cycle routes</li> </ul> Additional access for Housing sites: <ul style="list-style-type: none"> <li>Supermarket/conveniences stores</li> </ul>	3 5 5 5 5 5	33 <sup>14</sup>  Housing: 38	Employment score: 18-33 9- 17 1-8 0  Housing score: 21-38 11-20 1-10 0	++ + I --  ++ + I --
6: Reduce the need to travel and deliver a sustainable integrated transport network		5			
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 <sup>15</sup>	<ul style="list-style-type: none"> <li>Statutory nature conservation designations (SPA, SCA, SSSI, Ramsar and LNR);</li> <li>Regional Green Infrastructure Corridor;</li> <li>Site of Interest for Nature Conservation (SINC);</li> <li>Area of Local Nature Conservation (LNC) Interest;</li> <li>Ancient Woodland.</li> </ul>	n/a	n/a	Includes/is adjacent to a non-statutory designated site.	-
				500m from a <sup>16</sup> statutory site	-
				250m from a statutory designated site	--
	No designations			0	0

<sup>14</sup> 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.

<sup>15</sup> In reference to these criteria, 'adjacent' refers to a 10m buffer from a non-statutory site.

<sup>16</sup> 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.





## 2.5 When was the review undertaken and by whom

- 2.5.1 Work to complete this addendum to the SA Report (Feb 2018) was undertaken jointly by City of York Council and Wood in April 2018 with the exception of the review of implication from the HRA (April 2018) on the strategic sites. The strategic site options were appraised solely by the City of York Council.

## 2.6 Technical difficulties

- 2.6.1 The SEA Directive requires the identification of any difficulties (such as technical deficiencies or lack of knowledge) encountered during the appraisal process. No technical difficulties were encountered during the preparation of this Report. The uncertainties and assumptions set out in Section 5.9 of the SA Report (Feb 2018) remain relevant.

## 3. HRA update and air quality modelling study

### 3.1 Introduction

3.1.1 The City of York Council has updated the Habitats Regulations Assessment (HRA)<sup>19</sup> and air quality modelling of impacts of additional traffic movements arising from new growth on ecological sites<sup>20</sup> presented as an appendix to the HRA. This section provides a summary of the findings of these two studies.

### 3.2 HRA Report (April 2018)

- 3.2.1 It is accepted best-practice for the HRA 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.
- 3.2.2 At the time of publication of the Local Plan Publication Draft (Feb 2018) the HRA updated screening had not been completed and therefore there was some uncertainty regarding the plan's effects on designated European conservation sites. The preliminary screening assessment (2017)<sup>21</sup> screened out likely significant effects (LSE) from all policies and allocations in the emerging Local Plan except for policies SS13 (site ST15), SS18 (site ST33), SS19 (site ST35) and sites H59 and E18. The HRA (2017) found that LSE could not be ruled out alone for Policies SS13 (site ST15) and SS18 (site ST33) because of their potential effect on the Lower Derwent Valley SPA. For SS13, this was in terms of recreational pressure and also for impacts on the bird communities of the Lower Derwent Valley that also utilised land beyond the European site boundary. For SS18 it was solely in terms of recreational pressure. For Policy SS19 (site ST35), and sites E18 and H59 LSE could not be ruled out because of anticipated increases in recreational pressure on the adjacent Strensall Common SAC.
- 3.2.3 The screening undertaken in 2017 identified that by modifying Policy SS18 (and site ST33), the LSE of the policy and site could be ruled out. However, it was not found possible to screen out LSE in relation to proposed policies SS13 and SS19 and proposed sites E18, H59, ST15 and ST35. Therefore it stated that these must be subjected to an appropriate assessment (which had not been undertaken at that point).
- 3.2.4 The HRA (April 2018) screening assessment has identified that LSE cannot be ruled out for Policies SS13 and SS18 and for sites ST15, ST33 for their potential effect on the Lower Derwent Valley SPA, and Policy SS19 and sites ST35, E18 and H59 in terms of their potential effect on Strensall Common SAC. The HRA (2018) identified LSE arising from recreational pressure, changes to the hydrological regime and the effects of air pollution from increased traffic. However, after undertaking Appropriate Assessment and with the identification of mitigation, the HRA has concluded there are no adverse effects on the integrity of either site.

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<sup>19</sup> Waterman Infrastructure & Environment Limited for City of York council (April 2018) Habitats Regulations Assessment of the City of York Council Local Plan

<sup>20</sup> Waterman Infrastructure & Environment Limited for City of York council (April 2018) Air Quality Modelling Assessment

<sup>21</sup> Waterman Infrastructure & Environment Limited for City of York council (September 2017) - Habitats Regulations Assessment of the City of York Council Local Plan

- 3.2.5 This was informed by the conclusions of the air quality study undertaken to inform the determination of LSE (see **Section 3.3**). The HRA also recommended further minor changes to policy SS18 (although previously this had been screened out with mitigation).
- 3.2.6 The HRA (April 2018) states that should these mitigation measures be adopted the Council would be able to conclude that the entire Local Plan had no adverse effect on the integrity of a European sites across all policies.
- 3.2.7 The HRA (2018: page 45) formally concludes that “The City of York Local Plan was considered in light of the assessment requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017 by the City of York Council which is the competent authority responsible for adopting the plan and any assessment of it required by the Regulations. Having carried out a ‘screening’ assessment of the plan and an appropriate assessment/integrity test, the competent authority has concluded that they can ascertain that the Local Plan will have no adverse effect on the integrity of any European sites.”

### 3.3 Air quality modelling report (April 2018)

- 3.3.1 The City of York Council (CYC) has undertaken modelling of the air quality impacts to inform the HRA (published as an annex to the HRA (2018)). The purpose of the air quality assessment was to predict the potential effect of the City of York Local Plan on local air quality arising from increased traffic movements specifically in relation to designated ecological sites (both those considered under the HRA: Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites; and Sites of Special Scientific Importance (SSSI)). The most significant pollutants associated with road traffic emissions in relation to ecological sites are Nitrogen Dioxide (NO<sub>x</sub>) and Nitrogen deposition, which provided the focus of the study.
- 3.3.2 The study looked at impacts on the following ecological sites. The baseline conditions within the relevant ecological sites and those habitats sensitive to changes in NO<sub>x</sub> and nitrogen deposition were informed by the data on the Air Pollution Information System (APIS)<sup>22</sup>:
- Strensall Common SAC/SSSI,
  - Clifton Ings SSSI,
  - Fulford Ings SSSI,
  - Askham Bog SSSI,
  - Church Ings SSSI,
  - Acaster South Ings SSSI,
  - River Derwent SAC/SSSI and
  - Lower Derwent SPA/Ramsar/SSSI.
- 3.3.3 The study was based on traffic flow data comprising Annual Average Daily Traffic (AADT) flows, traffic composition (% Heavy-Duty Vehicles (HDVs)) provided by CYC for the surrounding road network. For the future year flows, all proposed site allocations and local traffic growth factors were applied to consider traffic growth and cumulative developments in the area<sup>23</sup>. **Table 3.1** identifies the modelling data used to inform the study.

<sup>22</sup> <http://www.apis.ac.uk/>

<sup>23</sup> City of York Council's Transport Topic Paper (2018) presents the wider traffic implications of the plan.

Table 3.1 Traffic modelling AADT used to inform the modelling

Link no.	Link Name	Speed (kph)	Base 2016		Without 2033		With 2033	
			AADT	%HDV	AADT	%HDV	AADT	%HDV
Strensall Common	Strensall Road	46	11,709	6.0	12,786	6.0	14,353	6.0
	Flaxton Road	62	1,925	6.0	2,102	6.0	3,416	6.0
	A1237	45	27,378	4.0	29,897	4.0	40,267	4.0
Clifton Ings	Water End	37	18,839	6.0	18,839	6.0	19,823	6.0
Fulford Ings	Radway Green Road	44	17,544	6.0	19,965	6.0	22,429	6.0
Askham Bog	A64	98	53,662	6.0	61,067	6.0	64,015	6.0
	Tadcaster Road	62	9,133	6.0	10,393	6.0	10,501	6.0
Acaster South Ings	B1222	67	2,734	6.0	2,734	6.0	2,709	6.0
Church Ings	B1222	67	2,734	6.0	2,734	6.0	2,709	6.0
River Derwent	A166	59	11,573	5.6	12,927	5.6	12,746	5.6
	A1079	61	16,655	7.4	18,604	7.4	19,527	7.4
Lower Derwent	B1228	53	4,641	7.1	5,184	7.1	5,606	7.1

Source: Air Quality Modelling Study Appendix A

- 3.3.4 Emissions and predicted concentrations of NO<sub>x</sub> were modelled along a transect at intervals of 1-5m; 10m; 15m; 20m; 25m; 50m; 100m; and 150m from the roadside. Additional contributions that might arise from increased traffic are only likely to be significant where the European site lies within 200m of a road.

## Findings of the air quality modelling

- 3.3.5 The findings of the air quality modelling are that:
- The predicted NO<sub>x</sub> concentrations are below the annual mean Critical Level of 30µg/m<sup>3</sup> at all ecological sites. The predicted effects on annual mean NO<sub>x</sub> concentrations are considered insignificant at all ecological sites;
  - Effects on nitrogen deposition (as measured by the Critical Load) are considered to be insignificant at all ecological sites except Strensall Common SAC where critical load was exceeded. The impacts at the Dwarf shrub heath at the Strensall Common SAC could not be screened out and further consideration to the significance of impacts at this site was considered within the HRA.
- 3.3.6 The main HRA (April 2018) considers the significance of impacts on the designated features of the Strensall Common SAC. Given that there is a risk that emissions from road traffic associated with Policy SS19/ST35 and sites E18 and H59 could undermine the conservation objectives for Strensall Common SAC a LSE cannot be ruled out (alone and in combination). Consequently, Appropriate Assessment was undertaken. It identifies a range of mitigating circumstances for Strensall Common in relation to air quality impacts (including extensive areas of scrub and bracken unrepresentative of the designated heathland habitats along the Towthorpe Moor Lane which provides an effective barrier to widespread dispersal of airborne nitrogen; and the modified nature of roadside vegetation alongside Flaxton Road/Lords Moor Lane). Given these mitigating factors, the HRA (April 2018) considers that the Local Plan would not have an adverse effect on the integrity of the Strensall Common.

### Air quality impacts on SSSIs

- 3.3.7 The consideration of the effects on the European sites (SACs, SPAs, Ramsars) is integrated into the HRA Report. The effects on SSSIs are not covered explicitly in the main HRA (April 2018) although they are contained within the annex.

### Fulford Ings SSSI

- 3.3.8 The Fulford Ings SSSI<sup>24</sup> lies outside a European designated conservation site. The specific SSSI Unit (007 Landing Lane) is recorded as being 1.16ha in size with the main habitat as lowland fen, marsh and swamp. The site is in close proximity to the A19 Selby Road, which runs adjacent to approximately 36m of the eastern edge of the site.
- 3.3.9 The Critical Nitrogen Loads for fen, marsh and swamp (*Juncus subnodulosus* - *Cirsium palustre* fen meadow) is 15kg N/ha/yr (low limit) – 30kg N/ha/yr (high limit). The air quality modelling shows that background concentrations of nitrogen deposition over the plan period will fall from 21.14 kgNha-1yr-1 in 2015 which exceeds the low critical load limit, to 13.53 kgNha-1yr-1 in 2033, below the low critical load limit and reflecting wider, anticipated improvements in air quality.
- 3.3.10 The predicted maximum long-term Process Contribution (PC) 'with development' (the predicted pollutant level increase as a result of emissions from additional vehicles associated with the Local Plan proposals being in place) would exceed the 1% long-term environmental standard threshold of both the low and high critical loads<sup>25</sup>. Taking a precautionary approach this would conclude that the cumulative impact of the Plan cannot be ruled out as insignificant on Fulford Ings SSSI. Not being able to rule it out as insignificant does not automatically equate to an ecological impact.
- 3.3.11 Natural England's latest assessment undertaken in 2011<sup>26</sup> recorded the SSSI Unit as being in Unfavourable-Declining (adverse) condition. This means that the Unit is not being conserved and will not reach favourable condition unless there are changes to site management or external

<sup>24</sup> Fulford Ings is an important example of flood plain mire located on low lying land between the River Ouse and Fulford village. It supports a sequence of plant communities which reflect the topography and hydrology, with alluvial grassland on higher ground, adjacent to the flood bank, a transitional zone of rich fen meadow and swamp in the most low lying areas furthest from the river. Such a sequence of plant communities is now uncommon as a result of the drainage and fragmentation of wetlands and the fact that it remains largely intact at Fulford Ings is of particular importance. The alluvial grassland is characterised by meadow foxtail *Alopecurus pratensis*, creeping bent *Agrostis stolonifera*, Yorkshire fog *Holcus lanatus*, great burnet *Sanguisorba officinalis*, ribwort plantain *Plantago lanceolata*, meadow vetchling *Lathyrus pratensis* and pepper-saxifrage *Silaum silaus*.

The rich fen meadow is dominated by sedges, including brown sedge *Carex disticha*, slender tufted sedge *C. acuta*, lesser pond sedge *C. acutiformis* and false fox sedge *C. otrubae*, with meadowsweet *Filipendula ulmaria*, great willowherb *Epilobium hirsutum*, marsh marigold *Caltha palustris*, common spike-rush *Eleocharis palustris*, marsh arrow-grass *Triglochin palustris* and stands of reed canary-grass *Phalaris arundinacea*.

Where the site is flooded most frequently and for the longest duration there are extensive beds of reed sweet-grass *Glyceria maxima* with occasional stands of yellow iris *Iris pseudacorus* and bulrush *Typha latifolia*. The nature conservation interest is dependent upon the maintenance of a high water table and on management of the alluvial grassland and fen meadow by mowing and grazing.

Natural England (1991) Fulford Ings SSSI citation. Available via:

<https://designatedsites.naturalengland.org.uk/PDFsForWeb/Citation/1006267.pdf> [accessed April 2018]

<sup>25</sup> In line with Defra and Environment Agency guidance increases below 1% are considered insignificant. Below 1% the magnitude of an effect is judged to be so low as to be inconsequential and can reasonably be assumed to result in no LSE when preparing HRA. See <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit#calculate-pc-for-substance-deposition>.

<sup>26</sup> Natural England (2011) Fulford Ings SSSI condition summary. Available via:

<https://designatedsites.naturalengland.org.uk> [accessed April 2018]

pressures. The site condition is becoming progressively worse, and this is reflected in the results of monitoring over time. The longer the SSSI unit remains in this poor condition, the more difficult it will be, in general, to achieve recovery. The reason for adverse condition is given as 'Agriculture – other', possibly because it is not in active management (not grazed or hay cut). The site is also known to be infested with the invasive non-native species Himalayan balsam (*Impatiens glandulifera*).

- 3.3.12 The Air Pollution Information System (APIS) website<sup>27</sup> indicates that nearly half of the local contribution of nitrogen deposition at this SSSI is made up of livestock (35%) and fertilizer (13%) with road transport accounting for 14%. The site is also subject to regular flooding from the River Ouse and its tributary Germany Beck and impacts from silt deposits and river water quality could well contribute far greater amounts of nitrogen than from air pollution.
- 3.3.13 Transect studies carried out by the air quality study identify that roadside deposition increases at the kerbside by 3% declining to 1% at 10m suggesting that nitrogen deposition quickly returns to near-background levels and it can be assumed that adverse effects on the SSSI are avoided beyond this limit. No significant effects are therefore considered likely on the SSSI.

#### *Air quality effect on other SSSIs*

- 3.3.14 The SSSI features of Strensall Common, Lower Derwent Valley and the River Derwent overlap with their Natura 2000 features. These sites have been assessed through the HRA process which has concluded no adverse effect on their integrity and are therefore not considered further here.
- 3.3.15 Paragraph 5.4 of the air quality study states that the maximum PCs 'with development' are below the criteria for insignificant impacts considering both the low and high Critical Loads at the Clifton Ings, Askham Bog, Church Ings, Acaster South Ings SSSIs. It is considered the impact of road traffic is insignificant at these ecological sites.

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<sup>27</sup> Available via: <http://www.apis.ac.uk/> [accessed April 2018]

## 4. Summary appraisal of effects

### 4.1 Introduction

- 4.1.1 This section reflects on the outcome of the screening of the proposed minor amendments to the Local Plan (set out in **Appendix A**), and the appraisal of the strategic sites, strategic and thematic policies, and the Local Plan cumulatively against SA Objective 8 (Appendices B, C and D).

### 4.2 Strategic sites

- 4.2.1 The scoring assessment for the sites set out in Section 6.5, Table 6.2 and Appendix I of the SA Report (Feb 2018) noted 'significant negative' effects on SA Objective 8 (biodiversity) for ST33: Station Yard, Wheldrake and ST35: Queen Elizabeth Barracks Strensall and mixed 'uncertain/significant' effects for ST13: Land west of Elvington Lane. This aligned with the ongoing HRA work. The scoring has been reviewed in light of the HRA (2018) (see **Appendix B**). No changes to the appraisal scoring have been identified but the commentary has been revised to take into account the HRA (2018). The site appraisal scoring recognises the effects of the site itself (without policy provisions). Significant effects are identified for ST15 and ST33 predominantly for their potential to have likely significant effects (LSE) on the Lower Derwent Valley SPA in relation to recreational pressure 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 and air quality. Following Appropriate Assessment the effects on European sites considered under biodiversity (SA Objective 8) can be mitigated through implementation of mitigation in policies within the Local Plan Publication Draft. However, ST15 is considered to still have uncertain effects on Heslington Tillmire SSSI.
- 4.2.2 Additional mitigation proposed by the HRA (2018) suggests that will be no adverse effects on the integrity of European sites if policy SS18 (for ST33) includes further clarification of mitigation relating to education and local footpath improvements and that policy SS13 (for ST15) incorporates a link to the additional new open space (OS10 within policy GI6) to be created for nature conservation purposes in connection to ST15. In addition, additional visitor strategy mitigation is suggested to require a wardening service to enable likely significant effects as a result of recreational pressure to be avoided. It is acknowledged that this is subject to implementation and in addition to site specific mitigation measures to be introduced at the detailed planning stage. Furthermore, it was concluded in the HRA that the plan will have no adverse effect on the integrity of Strensall Common SAC in terms of the impact of air pollution due to a range of mitigating circumstances.

### 4.3 Local sites

- 4.3.1 The preliminary HRA screening (2017) could not rule out likely significant effects in relation housing site H59: Queen Elizabeth Barracks – Howard Road, Strensall and employment site E18: Towthorpe in terms of the impact of recreational pressure on the adjacent Strensall Common. The HRA (2018) states that, subject to mitigation in the form of cross reference to Policy SS19 and Policy GI2: Biodiversity and Access to Nature, there would be no adverse effect on the integrity of Strensall Common SAC.
- 4.3.2 The scoring assessment for the sites set out in Table 6.3 and summarised in Section 6.5 of the SA Report (Feb 2018) noted 'significant negative' effects on Objective 8 (biodiversity) (based on



proximity to designated conservation sites under the methodology reproduced in Table 2.3). Paragraph 6.5.44 of the SA Report (Feb 2018) highlighted the uncertainty with regards to the HRA.

- 4.3.3 The scoring for these sites set out in the SA Report (Feb 2018) is unaffected by the conclusions of the HRA (April 2018) and remains as 'significant negative', as there are no changes to the site boundaries (upon which the site appraisal for the local sites was undertaken). However, following the updated HRA (April 2018), it is now recognised that with the mitigation set out in the proposed minor policy wording changes to EC1 and H1, there are no adverse effects on the integrity of Strensall common SAC. It is acknowledged that this is subject to implementation in addition to site specific mitigation measures to be introduced at the detailed planning stage.

## 4.4 Spatial strategy policies

- 4.4.1 Section 6.5 and Appendix F of the SA Report (Feb 2018) reported on the appraisal of the effects of the spatial strategy policies against the SA Framework. Paragraph 6.5.14 of the SA Report recognised that the HRA had not been finalised and LSE were found from Policies SS13 and SS18 on Lower Derwent Valley SPA and from Policy SS19 on Strensall Common SAC. Mitigation in Policy SS18 could mean that LSE could be avoided.
- 4.4.2 Following the update of the HRA (April 2018) and Appropriate Assessment, minor changes to Local Plan wording were found to provide suitable mitigation to ensure no adverse effects on the integrity of the European sites. This removes uncertainty with regards to LSE noted in the SA Report (Feb 2018). The proposed minor amendments to Policies SS13, SS18 and SS19 themselves are not considered significant. However, the updated HRA means that some of the evidence supporting the appraisal has effectively been superseded. Therefore these appraisals have been reviewed (see **Appendix A** and Table C1 of **Appendix C**).
- 4.4.3 Policy SS13 has been assessed as having 'minor negative' effects on SA Objective 8 (biodiversity), recognising that although uncertainty may be removed with regards to mitigation for effects on the SPA, potential effects on Heslington Tillmire SSSI remain.
- 4.4.4 Policy SS19 has been assessed as having mixed 'minor positive and negative' effects reflecting that although uncertainty with regards to mitigating the effects on the Strensall Common SAC have been addressed as a result of the HRA (2018), some minor negative effects remain although the policy would allow for improvements with regards to the access of nature and green infrastructure.
- 4.4.5 No changes have been identified for SS18 and the original SA Report (Feb 2018) assessment of 'minor positive effects' for this policy remains.

## 4.5 Thematic policies

- 4.5.1 Section 6.6 and Appendix J of the SA Report (Feb 2018) reported on the appraisal of the thematic policies in the Local Plan Publication Draft. This section summarises the outcomes of the review of appraisal following the update to the HRA (April 2018). See **Appendix A** and Table C2/C3 within **Appendix C**.

### Economy and retail

- 4.5.2 Policy EC1 was assessed as having 'uncertain' effects on SA Objective 8 (biodiversity) in the appraisal reported on in the SA Report (Feb 2018). The proposed minor amendment to the policy is not considered significant. However, the updated HRA (April 2018) supersedes the evidence upon which the policy was appraised. The removal of the uncertainty regarding the outcomes of the HRA means that the policy has been appraised as giving rise to 'neutral' effects on the SA Objective

recognising that the implementation of policies in the Local Plan will mitigate the effects with more detailed requirements to be considered through detailed planning application stage.

## Housing

- 4.5.3 Policy H1 was appraised as giving rise to 'neutral' effects on the SA Objective in the SA Report (Feb 2018). This recognised that the implementation of policies in the Local Plan will mitigate the effects with more detailed aspects to be considered through detailed planning applications. The proposed minor amendments to the policy have been reviewed and no significant effects have been identified.

## 4.6 Cumulative, synergistic and indirect effects

- 4.6.1 Section 6.7 of the SA Report (Feb 2018) outlined the total effects of the plan policies. Following the re-appraisal set out above, the cumulative effects table presented in Table 6.4 has been reviewed (see **Appendix D**). Only one change has been identified following the update of the HRA (April 2018): the policies in the Economy and Retail section of the draft Local Plan, which were previously appraised as 'uncertain' with regard to effects on biodiversity (SA Objective 8), are now considered to have a 'neutral' effect.
- 4.6.2 However, no changes to the overall appraisal of each section of the draft Local Plan against the SA Objectives have been identified.
- 4.6.3 In addition, the air quality effects of the draft Local Plan designated sites have been assessed with the outcomes presented in the air quality study (Section 3.3). Given the outcome of air quality modelling and HRA, Nitrogen Dioxide (NO<sub>x</sub>) and nitrogen deposition are identified as being insignificant across all ecological sites including SSSIs screened into the HRA (NB the HRA concludes that there are no adverse effects on the integrity of Strensall Common SAC'. In the case of Strensall Common SAC and Fulford Ings SSSI which was recognised as having effects in the study, due to the nature of the affected area of the site and the wider context, both are not considered significant.

## 5. Conclusion

- 5.1.1 The screening has found that the proposed minor amendments to the Local Plan provide clarifications and cross references to ensure that the outcomes of the HRA (2018) are incorporated into policy. The screening, in conjunction with the findings of the HRA (and supporting air quality study) led to a reappraisal of policies SS13, SS19, and EC1 with specific regards to the uncertainties at the time of the SA Report (Feb 2018). Proposed minor amendments to the remaining policies (Policies SS18, H1 and G12) were not considered significant to warrant reappraisal although the HRA update (April 2018) has led to changes to the appraisal commentary for SS18 and H1.
- 5.1.2 With regard to strategic sites ST13, ST33 and ST35, no changes have been recorded in the appraisal. However, commentary for the sites has been revised to reflect the outcome of the HRA (April 2018) and the conclusion that there are no adverse effects on the integrity of European sites (with mitigation measures).
- 5.1.3 No changes were recorded for the appraisal of sites H59 and E18 (as a function of the site appraisal scoring system). However, the HRA (April 2018) helps to remove uncertainty with regards to whether the significant negative effects can be mitigated.
- 5.1.4 With regards to air quality monitoring evidence relating to the effects of road traffic on ecological sites, the study identified effects for Strensall Common SAC and Fulford Ings SSSI. However, in both cases, due to the nature of the affected area of the site and the wider context, both are not considered significant.

### 5.1 Next steps

- 5.1.1 CYC will now progress towards submission of the Local Plan by the end of May 2018.

# Appendix A

## SA implications from proposed minor changes in response to the update of the HRA

Where the proposed minor amendment requires the removal of text this is indicated using ~~strike through~~, where new text has been added this is underlined.

Policy	Site	Proposed minor amendment to wording in light of HRA	SA implications arising from proposed change
SS13	ST15 Land West of Elvington Lane	<p>Deletion in iv) "Create new open space (<del>as shown on the proposals map</del>) within the site..."</p> <p>Addition to vi) "Incorporation of a new nature conservation area (as shown on the proposals map <u>as allocation OS10 and included within Policy GI6 New Open Space Provision</u>)..."</p>	<p>The deletion and addition within criterion iv) provides clarity as to the appropriate cross reference for open space proposals associated with the proposed site allocation at ST15.</p> <p>The changes in the wording clarify the correct cross reference for open site provision. This is not considered a significant change to the policy and is not considered to give rise to the need for a re-appraisal.</p> <p>However, given the HRA (April 2018) concludes that there are no adverse effects on the integrity of Lower Derwent Valley SPA it is proposed to review the appraisal. The SA Report (Feb 2018) appraised the policy as having a 'minor negative/uncertain' against SA Objective 8. The policy has been re-appraised. See Table C1 in Appendix C and Appendix B for site appraisal changes.</p>
SS18	ST33 Station Yard, Wheldrake	<p>Expand iv) to include: "<u>This will require the developer to publicise and facilitate the use of other, less sensitive countryside destinations nearby (e.g. Wheldrake Woods) and provide educational material to new homeowners to promote good behaviours when visiting the</u></p>	<p>This proposed addition expands criterion iv) of Policy SS18. Criterion iv) relates to the potential impacts of recreational disturbance on the Lower Derwent Valley SPA/Ramsar/SSSI.</p>

		<p><u>European site. The former could be supported by enhancing the local footpath network and improving signage."</u></p>	<p>The proposed change in the policy draws out elements that need to be particularly considered for the management of visitors to the designated site and is not considered a significant change that requires re-appraisal.</p> <p>The appraisal of policy SS18 in the SA Report (Feb 2018) noted 'minor positive' effects in relation SA Objective 8. No changes to the appraisal are required. However, following the update of the HRA (April 2018), minor changes to the commentary are required. See Table C1 in Appendix C and Appendix B for site appraisal changes.</p>
SS19	ST35 QEB Strensall	<p>Addition to ii) On Strensall Common ensure suitable behaviour by visitors by:</p> <p><u>"The introduction of an efficient wardening service that could supplement the work of existing landholders including the MOD and Yorkshire Wildlife Trust. A physical presence on site could promote good behaviours by visitors, encouraging use of existing paths and ensuring dogs are properly controlled. The necessary costs would best be secured by an appropriate levy or similar on each development."</u></p> <p>Amendment to explanatory text at para 3.84 to read:          "The location of this site adjacent to Strensall Common SAC means that a comprehensive evidence base to understand the potential impacts on biodiversity from further development is required. Strensall Common is designated for it's heathland habitats but also has biodiversity value above its listed features in the SSSI/SAC designations that will need to be fully considered. Although the common is already under intense recreational pressure, there are birds of conservation concern amongst other species and habitats which could be harmed by the intensification of disturbance. In addition, the heathland habitat is vulnerable to changes in the hydrological regime</p>	<p>This proposed addition expands criterion ii) of Policy SS19. Criterion ii) relates to the potential impacts of recreational disturbance on Strensall Common SAC and the considerations for management of visitors. The proposed minor change provides further clarity of the expectations about this management.</p> <p>The changes are not considered significant in that they expand upon the existing policy provisions in relation to visitors/recreation use and do not give rise to the need to re-appraise the policy.</p> <p>However, given the outcome of the HRA (April 2018), which finds that there are no adverse effects on the integrity of Strensall Common SAC (subject to mitigation) the policy has been re-appraised. The SA Report (Feb 2018) noted 'uncertain' effects</p>

		<p><u>and air quality</u> which needs to be explored in detail. The mitigation hierarchy should be used to identify the measures required to first avoid impacts, then to mitigate unavoidable impacts or compensate for any unavoidable residual impacts, and be implemented in the masterplanning approach. <u>A recreational strategy and physical presence on site with the use of a warden could promote good behaviours by visitors, encouraging use of existing paths and ensuring dogs are properly controlled. The necessary costs for this would best be secured by an appropriate levy or similar on each development. Potential access points into the planned development also need to consider impacts on Strensall Common.</u>"</p>	<p>against SA Objective 8. See Table C1 in Appendix C and Appendix B for site appraisal changes.</p>
H1	Housing Allocations	<p>Add new Footnote in Table 5.1 to H59;</p> <p><u>"i) – ii) of Policy SS19 apply to this allocation in relation to assessing and mitigating impacts on Strensall Common SAC and must also take account of Policy GI2."</u></p>	<p>The proposed change cross references Policy SS19, regarding impacts on Strensall Common SAC, and GI2. The change is not considered significant.</p> <p>The policy was assessed as having 'neutral' effects within Appendix H and summarised within Section 6.5 of the SA Report (Feb 2018). However, given the outcomes of the HRA (April 2018), minor changes to the commentary are required. See Table C2 in Appendix C.</p>
EC1	Provision of Employment Land	<p>Add new Footnote in to E18;</p> <p><u>"i) – ii) of Policy SS19 apply to this allocation in relation to assessing and mitigating impacts on Strensall Common SAC and must also take account of Policy GI2."</u></p>	<p>The proposed change cross references Policy SS19, regarding impacts on Strensall Common SAC, and GI2. The change is not considered significant.</p> <p>The policy was assessed as having 'neutral' effects in within Appendix H and summarised within Section 6.5 of the SA Report (Feb 2018). However, given the outcomes of the HRA (April 2018), minor changes to the commentary are required. See Table C3 in Appendix C for updated appraisal.</p>



## Appendix B

# Appraisal of strategic sites against SA Objective 8 following update of the HRA

Where the revision to matrices requires the removal of text this is indicated using ~~strikethrough~~, where new text has been added this is underlined. Similarly where the score has been amended on a matrix this is also indicated using ~~strikethrough~~ for the previous score and underlining for the new score.



**ST15: Land to the West of Elvington Lane**

**(Allocation Site ref: 851)**

\* The appraisal is presented here in the same manner as the SA Report (Feb 2018) allowing for comparison with site boundary alternatives considered for the site.

A Objective	Sub-objective (Will the site...?):	Allocation (site 851)	Alternative 1 (site 984) Post PPC	Alternative 2 (Site 979) Developer PPC	Alternative 3 (site 888) Developer	Alternative 4 (site 877/985)	Commentary*
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	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	-- ?	-	-	-	-	<p><b>Likely Significant Environmental Effects</b></p> <p>This site would be subject to policies within the Local Plan in relation to Green Infrastructure and Biodiversity relating to creation, preservation and enhancement.</p> <p>The site includes arable farmland interspersed with mixed woodland copses as well as a middle section of Elvington Airfield. In its entirety Elvington Airfield is identified as a Site of Importance for Nature Conservation (SINC) for birds and part of this will be directly lost to development. Two separate sections of the Airfield are designated as SINC for species-rich grassland. These sections are immediately adjacent to the allocation boundary and would be adversely affected by increased access. The site is within 1km of a Site of Special Scientific (SSSI): Heslington Tillmire, and a further SINC: Fulford Golf Course. It is also within 5km of the Lower Derwent Valley (LDV), which is notified as a SSSI, classified as Special Protection Area (SPA), and designated as Special Area of Conversation (SAC) and Ramsar site; parts are also designated as a National Nature Reserve (NNR). Evidence suggests that there is a functional link between the LDV and the allocation as wintering wetland birds from the SPA also utilise land within the allocation for feeding and roosting. These species will therefore be vulnerable to habitat loss from construction and ongoing disturbance from recreational activities. Potential impact from recreation would also adversely affect Heslington Tillmire SSSI.</p> <p><u>Elvington Airfield SINC</u></p> <p>The species-rich grassland SINC areas adjacent to the site boundary would be adversely affected by increased uncontrolled access and others negative impacts associated with</p>

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	<p>and the natural environment; Provide opportunities for people to access the natural environment.</p>	Red	Yellow	Yellow	Red	Red	<p>housing proximity, and the construction and operation of a new access road to Elvington village.</p> <p>A significant area of the bird SINC will be lost and the remainder fragmented and adversely affected by increased uncontrolled access and others negative impacts associated with housing proximity. Without sufficient mitigation and compensation there will be adverse effects on the existing SINCs and overall biodiversity.</p> <p>Although the allocation boundary incorporates part of the airfield and therefore the SINC area designated for birds, it is aligned between the two grassland SINC. Whilst not directly including them in the development it is reasonable to assume that these sites would still experience significant negative effects as a result of development through urban edge effects and recreational pressure unless mitigation was in place to make the sites inaccessible to the public. This would also be likely for alternative 3 and 4 which share the same boundary on to the airfield. Furthermore, in comparison to alternatives 1 and 2, there would be less area that could potentially be left undisturbed to mitigate for the candidate SINC for birds. Although there would be a large area to the west and east of the allocation, a secondary access would need to be provided to Elvington Lane which may cause disturbance in areas outside of the allocation boundary. In addition, the area to the east is reduced in comparison to alternatives 1 and 2.</p> <p>Alternatives 1 and 2 extend the development along the runway taking in more of the SINC to the east. The effects of this are still likely to be significant with the direct loss of SINC habitat but there is an opportunity presented to retain the western half of the runway and the SINC in this area. This may be positive for birds associated with the SINC</p>

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							<p>(and also LDV and SSSI) given the large area that would remain as an undisturbed area, subject to making this inaccessible for recreational purposes to minimise disturbance.</p> <p><u>Heslington Tillmire SSSI</u></p> <p>Heslington Tillmire SSSI is located to the west of the site. The SSSI is notified for its habitats of tall herb fen and marsh grassland as well as wading birds, including lapwing, curlew, redshank and snipe, which live and breed in the marshy grassland. The last assessment by Natural England (2011) found the Tillmire to be in favourable condition. A National Vegetation Classification (NVC) Survey undertaken on behalf of the developer/landowner in 2014 found consistent results with the former and the original SSSI designation interest species.</p> <p>Development of a new garden village within proximity to this SSSI could potentially have significant adverse effects through disturbance to the breeding birds and damage of the grassland as well as changing the hydrological levels which create this habitat. It is acknowledged that Heslington Tillmire already receives disturbance through the use of surrounding footpaths which bound the site and through its designation as Open Access Land available for the public. However, greater disturbance through the close location of a new settlement may have significant adverse effects and is a point applicable to all boundaries appraised.</p> <p>Access to the SSSI is currently available by public footpaths (including the Minster Way linked to Heslington) and via road on Long Lane. The allocation boundary and alternatives 3 and 4 also have an additional right of way extending from Long Lane/Langwith Stray southwards into the site which may be used to link more directly with the SSSI and open access land. Minimising access to Heslington Tillmire SSSI will be</p>

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							<p>paramount in minimising disturbance. Should the development go ahead, access to the SSSI should be restricted without compromising the Open Access Land and Public Rights of Way (PRoW) designations. Suitable Alternative Natural Green Spaces (SANGS) incorporating new networks of attractive footpath routes should be incorporated as part of a site specific Green Infrastructure and Recreation Strategy to divert recreational disturbance pressure away from sensitive sites including the SSSI and adjacent SINC. The potential to restrict access to the Open Access land (for 28 days) on the SSSI during the bird breeding season via application to Natural England to help minimise disturbance should be explored.</p> <p>A new population in this location may also have direct consequences on predation of birds in the vicinity. The direct impact on the Tillmire is reduced through the allocation and alternative boundaries being 1km away with the exception of alternative 4 which brings development closer to the SSSI. Predation from domestic cats in particular would have a direct adverse effect on bird populations on site, particularly where they are ground nesting. Sufficient and appropriate buffering/landscaping would need to be in place to ensure that predation is minimised through locating development far enough away from any known area for breeding birds</p> <p>As part of alternative boundary 2, the site promoters proposed an area of enhanced habitat adjacent to Heslington Tillmire in addition to the western end of Elvington airfield, both of which would have no/limited accessibility to the public. This mitigation was based upon their evidence to understand the effects of development and the scale of mitigation necessary to avoid, mitigate and compensate these effects as a result of the development. This mitigation scheme would also be applicable to alternative 1 given the similarity in the boundary. Associated with the allocation boundary is an openspace</p>

**ST15: Land to the West of Elvington Lane**

**(Allocation Site ref: 851)**

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							<p>adjacent to the SSSI which is identified solely for nature conservation associated with ST15. This extends beyond 400m from the SSSI up to the A64 to help mitigate and compensate for effects of development aligning with and extending the site promoter’s proposals but excluding additional land on western section of the airfield. This airfield mitigation measure would still be relevant but its implementation is uncertain in connection with the allocation boundary. More mitigation maybe required as a result of alternative 3, given it would bring development closer to the SSSI and for alternative 4 which would increase the scale of the settlement.</p> <p>Advice from Natural England suggests a minimum 400m buffer with deterrents to minimise effects, which accords with the proposed openspace / habitat mitigation areas proposed for the allocation and alternatives 1 and 2. They also recognise the potential significant negative impacts that development in this location may have and whilst they welcome the requirement to avoid impacts on Heslington Tillmire SSSI and secure an area for mitigation, there will also need to be an appropriate site wide recreation and access strategy to minimise indirect disturbance from the development and compliment the mitigation area.</p> <p>The site promoters indicate through submissions for alternative 2, which are also relevant to alternative 1,that masterplanning would include up to 40% of the site areas for openspace and provide “A connected, multi-functional network of green spaces and corridors will be incorporated that permeates the residential areas and forms part of the movement network for pedestrians and cyclists. This network will include public open space, play areas, amenity space, playing pitches, SUDS, wildlife corridors, allotments and orchards, and green movement corridors”. These proposals should help to ensure that facilities on-site are attractive for the new population and help to minimise recreational</p>

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							<p>trips to the SSSI in line with Natural England’s concerns. Whilst the allocation boundary would be subject to policies in the plan regarding green infrastructure, including openspace provision, the openspace and recreational strategy is currently unknown.</p> <p>All ecological measures should be established prior to development, particularly in locations near the SSSI, SINC and highly populated bird areas in early phases to ensure that they can sufficiently establish.</p> <p><u>Lower Derwent Valley (LDV)</u></p> <p>A number of surveys and evidence has been produced on behalf of the developer/landowners to identify and understand the significance of the bird populations as well as whether this would have a consequential negative impact on the Lower Derwent Valley SPA, SSSI and Ramsar site (and Heslington Tillmire SSSI). This evidence is relevant to all site boundaries although it should be noted that there is a gap in evidence in the middle part of the allocation, which is in third party ownership; however, given the proximity and similar (if not identical land-use) it is reasonable to presume that this will support similar biodiversity interest as the adjacent SINC including wetland bird populations from the LDV. This gap in evidence is also relevant for alternatives 3 and 4. In addition, there is a significant evidence gap for alternative 4 given the boundary extends to the north and evidence gap for alternative 3 for the additional land included at Langwith Lakes.</p> <p>Although the LDV lies some distance away, the <u>Habitat Regulations Assessment</u> <del>Habitat Regulations Assessment Screening Report (2017)</del> has evaluated evidence that suggests there may be a functional link for wetland bird species between the LDV, the site (particularly the airfield and adjacent land) and the adjacent SSSI. <u>Initial advice received</u></p>

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							<p>from Natural England concurs with this conclusion. The HRA concluded that a likely significant effect could not be ruled out and that an Appropriate Assessment would be required. Specifically, it stated that <i>“recent ornithological studies have suggested that the site and its environs regularly support considerable numbers of both golden plover and lapwing, both identified as components of the non-breeding bird assemblage of the SPA...with limited information available [representative to this site boundary] ensure that no mitigation can be applied, the conclusion of LSE alone remains and an appropriate assessment is required.”</i> Furthermore, the HRA suggests that this site needs to be informed by ongoing ornithological surveys that evaluate the impact on wintering waders and can be used to identify bespoke mitigation measures. Initial advice received from Natural England concurs with this conclusion.</p> <p>Ongoing work on the HRA suggests that the successful delivery of this allocation and policy will require the development and implementation of a comprehensive mitigation strategy to ensure that adverse effects on the integrity of the LDV SPA and Ramsar site can be ruled out. This will have to take account of habitat loss through construction and ongoing disturbance from recreational activities, including the provision of Suitable Alternative Natural Green Space and a site-wide recreation and access strategy.</p> <ul style="list-style-type: none"> <li>• <u>The revised HRA (2018) further considered that evidence and the potential mitigation required. This states that “Comprehensive requirements for mitigation are already embedded in the existing policy that anticipates the establishment of extensive areas of wet grassland and public open space. Together, these would provide enhanced areas of functionally-linked land for bird populations from the European site and provide alternative countryside recreational opportunities for new residents. Unfortunately, there</u></li> </ul>

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							<p><i>are insufficient opportunities within SS13/ST15 to deliver all aspects of the built development alongside the measures to provide public open space and ecological mitigation.</i></p> <ul style="list-style-type: none"> <li><i>The opportunity to implement these mitigation measures is provided by Policy/Allocation OS10 which is situated immediately adjacent to the west of SS13/ST15. The purpose of OS10 is described as the provision of 'significant areas of open space ... in connection with a strategic site' designed to 'mitigate ... for ecological impacts' and, as a 'New Area for Nature Conservation on land to the South of the A64 in association with ST15'. However, there is no formal policy mechanism in SS13/ST15 that ensures both it and OS10 must be pursued together to secure sustainable development.</i></li> <li><i>To provide certainty that the embedded mitigation and open space requirements described in Policy SS13/ST15 can be delivered, it is recommended that the Plan is modified to provide a formal link in policy terms with OS10. This will enable delivery of the ecological mitigation whilst public open space can be secured within the footprint of SS13/ST15.</i></li> <li><i>This can be delivered by deleting the phrase '(as shown on the proposals map)' in sub-section (iv) and amending sub-section (vi) to read as follows: 'Incorporation of a new nature conservation area (as shown on the proposals map as allocation OS10 and included within Policy G16 New Open Space Provision)...</i></li> <li><i>Should this or similar wording be added to Policy SS13/ST15 it is concluded that the Council can ascertain that Policy SS13/ST15 will have no adverse effect on the integrity</i></li> </ul>



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							<p><u>of the Lower Derwent Valley European site in terms of the disturbance of bird populations. There would be no residual effects and no need for an in combination assessment.."</u></p> <p><u>Other ecology</u></p> <p>A range of other ecological surveys have been undertaken on behalf of the landowners/developers over the last four years to identify potential constraints and opportunities for alternative site boundary 2. Where appropriate this evidence base remains valid for all sites considered where the boundaries overlap although it should be noted that there are gaps in evidence as outlined above. Surveys have included Phase 1 Habitat Surveys, National Vegetation Survey, and surveys for great crested newts, reptiles and butterflies. Great crested newts were found on adjacent land and notable butterfly species were found on site; no reptiles on site were identified. Appropriate mitigation will be required to ensure the habitats for the identified species are appropriately provided.</p> <p>The requirement for further species surveys including badgers and bats have been identified.</p> <p>All biodiversity impacts should be addressed by following the mitigation hierarchy with the overall aim to prevent harm to existing biodiversity assets, delivering no net loss for biodiversity and maximising further benefits.</p> <p>On balance, the allocation is assessed as likely to have a potentially significant negative effect on this objective. <u>This is based upon the loss of and impact on the Elvington Airfield SINC site and impacts on Heslington Tillmire SSSI.</u> Uncertainty is also identified given site specific mitigation in relation to this site is yet to be <u>fully</u> established.</p>

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							<p>Notwithstanding this, it is acknowledged that the HRA (2018) concludes that with mitigation ST15 will have no adverse effects on the integrity of the Lower Derwent Valley SPA. Similarly, impacts on all of the alternative boundaries are also identified as significantly negative recognising the potential loss of and potential harm to the SINC, SSSI and potentially the Lower Derwent Valley (as their boundaries/quantums have not been subject to HRA). However it should be acknowledged that alternative 1 and 2 may have more positive impacts as a result of the mitigation proposed by the site promoters both adjacent to the SSSI and on the western end of the runway as well as an initial strategy for managing recreation. Alternatives 3 and 4, given the gaps in evidence are identified as having only significant negative effects.</p> <p>It is also noted that Appropriate Assessment is required as part of the Habitat Regulations Assessment process.</p> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li>• A minimum of 400m buffer to the SSSI to mitigate predation from domestic animals;</li> <li>• Appropriate ecological enhancement of the development site to increase its biodiversity and minimise impacts to the SSSI/ LDV through increasing ecological functionality. This should be agreed alongside City of York Council and Natural England.</li> <li>• Ecological enhancement of the site should be prioritised within the masterplanning/phasing.</li> <li>• Phasing of development should prioritise locations away from the SSSI to minimise disturbance and allow any ecological enhancement to establish.</li> </ul>

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							<ul style="list-style-type: none"> <li>A full Green Infrastructure and Recreational Plan for the development should be developed, incorporating open space and a biodiversity management plan. Any management plans for the site should take into consideration the requirements of the SSSI to maximise synergistic benefits from enhancement and management proposals. Any management proposals will need to be agreed with Natural England.</li> <li>Create a policy link in policy SS13/ST35 as set out in the HRA: "deleting the phrase <b>'(as shown on the proposals map)'</b> in sub-section (iv) and amending sub-section (vi) to read as follows: <b>'Incorporation of a new nature conservation area (as shown on the proposals map as allocation OS10 and included within Policy GI6 New Open Space Provision).</b></li> </ul> <p><b>Assumptions</b></p> <ul style="list-style-type: none"> <li>The evidence bases referred to have been prepared on behalf of the landowners/developers remain valid. This has involved discussions with CYC ecologists and Natural England. It should be noted that there is a gap in evidence for an area in the mid-west of the site that is in third party ownership.</li> <li>Previously suggested mitigation measures are yet to be agreed in relation to this site boundary.</li> </ul> <p><b>Uncertainties</b></p> <ul style="list-style-type: none"> <li><del>The implementation timescale of mitigation measures and their effectiveness in the long-term are uncertain. The scale and residual effects of development are therefore also uncertain. The mitigation measures will need to be refined through the detailed planning application stage, including ecological receptor-specific evaluation.</del></li> </ul>

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		Red	Yellow	Orange	Red	Orange	Red	Red	Red	Red	<ul style="list-style-type: none"> <li>There is a gap in evidence for an area in the mid-west of the allocation that is in third party ownership. There are also evidence gaps associated with alternative 3 and 4.</li> </ul>

## ST33: Station Yard, Wheldrake

(Site ref: 855)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
<p>8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.</p>	<p>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCs);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>	<p>-</p> <p>-</p>	<p><b>Likely Significant <u>Environmental</u> Effects</b></p> <p>The site does not include any nature conservation designations but is within 1.8km of the Lower Derwent Valley SAC, SPA, Ramsar and River Derwent SAC. <u>The Habitat Regulations Assessment states for this site: The site is within just 2km of the SPA including 'Bank Island', the most important site for breeding birds across the entire European site as well as Wheldrake Ings National Nature Reserve run by the Yorkshire Wildlife Trust.</u></p> <p>The Lower Derwent Valley supports diverse, fragile breeding and non-breeding bird populations throughout the year, both within the SPA and on functionally-linked land beyond which are vulnerable to disturbance and displacement. In addition, the terrestrial habitats, especially the grassland communities, are all equally vulnerable to disturbance from public pressure which could result in trampling and erosion.</p> <p>Whilst access to much of the SPA is managed and/or restricted (<u>such as to Wheldrake Ings</u>), it is not completely controlled. Furthermore, whilst the majority of functionally-linked land is found on private land, access here can also not be fully managed. Consequently, given the location of certain allocations (eg ST33) within a few kilometres of the SPA, adverse effects cannot be ruled out if recreational pressure is to increase considerably.</p> <p><u>Given that the SPA would be perhaps be one of the most obvious destinations for outdoor recreation, the impact of increased public pressure (frequently allied with dog walking) and predation pressure from cats ensured that LSE alone could not be ruled out in the HRA screening.</u> The HRA <u>screening</u> concludes that given the uncertainty surrounding Policies SS18 (ST33) in particular, there is a risk that the proposals could undermine the conservation objectives for the Lower Derwent Valley SPA and that a likely significant effect cannot be ruled out (alone) and so the policy must be screened in (Category I).</p> <ul style="list-style-type: none"> <li>• <u>However, the HRA (2018) appropriate assessment concludes "Policy SS18/ST33 already provides some mitigation by ensuring that any new development must accord with principle (iv) to 'undertake a comprehensive evidence based approach in relation to biodiversity to address potential impacts of recreational disturbance on the Lower Derwent Valley Special Protection Area (SPA)/Ramsar/SSSI'. However, this fails to adequately describe a desired outcome and cannot be relied on to provide adequate mitigation.</u></li> </ul>

## ST33: Station Yard, Wheldrake

(Site ref: 855)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
			<ul style="list-style-type: none"> <li><u>Given the careful management of recreational pressure at the Lower Derwent Valley including footpaths, hides and wardening, it is considered that a modest revision to section (iv) of the Policy SS18/ST33 by incorporation of the following wording or similar would be sufficient to effectively remove the potential threat and avoid an adverse effect on the integrity of the European site alone.</u></li> <li><u>'This will require the developer to publicise and facilitate the use of other, less sensitive countryside destinations nearby (e.g. Wheldrake Woods) and provide educational material to new homeowners to promote good behaviours when visiting the European site. The former could be supported by enhancing the local footpath network and improving signage.'</u></li> <li><u>Consequently, if the proposed amendment is adopted it is concluded that the Council can ascertain that Policies SS18/ST33 will have no adverse effect on the integrity of the Lower Derwent Valley European site in terms of the disturbance of bird populations. There would be no residual effects and no need for an in combination assessment."</u></li> </ul> <p><u>The site scores as potentially significantly negative against this objective to reflect the site's proximity to the Lower Derwent Valley SPA. Notwithstanding this, it is acknowledged that the HRA (2018) conclusion states that with mitigation there is no adverse effect on the integrity of the SPA.</u></p> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li><u>Comprehensive evidence base is required to determine ecological issues in detail and potential mitigation strategy. Revise section (iv) of policy SS18/ST33 to include the following and remove potential threat of adverse effects on the integrity of the site identified by the HRA:</u> <u>'This will require the developer to publicise and facilitate the use of other, less sensitive countryside destinations nearby (e.g. Wheldrake Woods) and provide educational material to new homeowners to promote good behaviours when visiting the European site. The former could be supported by enhancing the local footpath network and improving signage.'</u></li> </ul> <p><b>Assumptions</b></p>

## ST33: Station Yard, Wheldrake

(Site ref: 855)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
			<ul style="list-style-type: none"> <li><i>The biodiversity value of brownfield land is less than that of greenfield sites.</i></li> </ul> <p><b>Uncertainties</b></p> <ul style="list-style-type: none"> <li><i>The type and location as well as mitigation measures are to be determined through masterplanning. This creates uncertainty as to the scale and significance of any effects. The mitigation measures will need to be refined through the detailed planning application stage, including ecological receptor-specific evaluation.</i></li> </ul>

## ST35: Queen Elizabeth Barracks, Strensall

(Site ref: 934)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	<p>Protect and enhance international and nationally significant priority species and habitats within SACs, SPAs, RAMSARs and SSSIs ;</p> <p>Protect and enhance locally important nature conservation sites (SINCS);</p> <p>Create new areas or site of bio-diversity / geodiversity value;</p> <p>Improve connectivity of green infrastructure and the natural environment;</p> <p>Provide opportunities for people to access the natural environment.</p>	--	<p><b>Likely Significant Environmental Effects</b></p> <p>This site is adjacent to Strensall Common Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which is designated for its lowland heath. Extensive areas of both wet and dry heath occur and form a complex habitat mosaic with grassland, woodlands and ponds. Strensall Common also has biodiversity value above its listed features in the SSSI/SAC designations that will need to be fully considered e.g. ground nesting birds, invertebrates and aquatic fauna and flora.</p> <p><u>Hydrological regime</u></p> <p>The habitats on the SAC are fragile and are vulnerable to changes in the surface and sub-surface hydrological regime, impacts which can be easily prompted by large scale construction nearby. <u>The HRA of the Local Plan refers to a shadow HRA produced on behalf of the site promoter, which considers that mitigation should include using "Sustainable Drainage Systems (SuDS) for the management of surface water, use of silt fencing to trap sediment, and the adoption of best practice measures for pollution management embedded within a Construction Management Plan (CEMP)." The HRA (2018) goes on to acknowledge that these and a number of other mitigation measures are embedded in Policy SS19 that require hydrological and related studies to be completed and used to inform the development effective, deliverable, mitigation measures prior to any consent. The HRA therefore screens out likely significant effects in relation to hydrological regime.</u></p> <p><u>Air Quality</u></p> <p>Its heathland communities are particularly vulnerable to elevated levels of nitrogen deposition from increased road traffic associated with new development. Current evidence shows that <u>both existing and predicted nitrogen deposition at Strensall Common exceed the minimum critical loads the SAC already exceeds the critical load for nitrogen, prior to assessment of the plan.</u></p> <p><u>Whilst acknowledging this, the Air Quality Assessment undertaken for the plan seeks to understand impacts on nature conservation sites (Annexed to HRA (2018)), in-combination with other development using traffic and air</u></p>



## ST35: Queen Elizabeth Barracks, Strensall

(Site ref: 934)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
			<p><u>quality modelling. This assessment shows that the nitrogen deposition at Strensall Common with development is above the criteria for ruling out insignificant impacts and is therefore screened in for further assessment. Harmful effects may therefore occur on the vegetation in closest proximity to the road. However, given the modified nature of the vegetation on the road side and that nitrogen deposition is shown to decrease with distance from kerbside, quickly returning to near-background levels, the HRA concludes that it is likely that the plan will slow down the rate of improvement, but not meaningfully increase nitrogen deposition, and is highly unlikely to undermine the conservation objectives of the SAC. It also concludes that there would be no residual effects and no need for an in-combination assessment.</u></p> <p><u>Recreational Pressure</u></p> <p>The lowland heath is also vulnerable to recreational pressure. Although the common is already well used for a range of activities, further intensification could harm the lowland heath habitat through trampling, erosion, disturbance of stock and nutrient enrichment (dog fouling). In addition there are birds of conservation concern and other wildlife which are also susceptible to any increase in disturbance. Increased disturbance as a result of recreational behaviour is likely from development adjacent to the Common and may cause significant harm. The reduction and mitigation of such impacts for example through Suitable Alternative Natural Green Spaces (SANGS), active wardening and raising awareness amongst users needs to be given careful consideration and be informed by a comprehensive visitor survey of the Common. An appropriate mechanism to provide sustainable funding for this approach will be required, such as through a levy on the new homes.</p> <p><u>Scrub encroachment is a major threat to lowland heath and to manage this Strensall Common is managed under Environmental Stewardship using sheep and cattle grazing by an adjacent tenanted farmer. Interruption to this management regime or factors making it unviable could undermine the conservation objectives for the Common and have a potentially negative effect on the integrity of the site.</u></p> <p>The Habitat Regulations Assessment (2018) screening ( <del>Report (2017)</del> ) concludes that as no meaningful mitigation had been proposed within the policy to avoid or mitigate these adverse, that likely significant effects</p>

## ST35: Queen Elizabeth Barracks, Strensall

(Site ref: 934)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
			<p>could not be ruled out and that an appropriate assessment would be required to evaluate the impacts from anticipated increases in recreational pressure and road traffic pollution, and construction.</p> <ul style="list-style-type: none"> <li>Subsequent changes to the policy-wording has sought to prevent easy, direct access to the Common from the proposed development and provide alternative, natural greenspace to mitigate the adverse consequences of increased recreational pressure (openspace OS12 in policy GI6). <del>The effectiveness, or otherwise, of these proposals will be evaluated in the next iteration of the HRA. The revised HRA (2018) states:</del> <u>"The screening exercise concluded that significant effects from recreational pressure on the dry and wet heathland communities at Strensall Common SPA cannot be ruled out alone.</u></li> <li><u>Comprehensive mitigation is already embedded within Policy SS19/ST35 which provides for extensive open space within the allocation and restricts direct access to the Common for new residents. This is expected to successfully reduce but not prevent the frequency of visits to the Common and so cannot be relied upon entirely to safeguard the European site. Furthermore, no effective measures are proposed that will address the behaviour of visitors (and their dogs) when on the Common. Policies H59 and E18 face no restrictions although their impact is considered to be of a much smaller scale.</u></li> <li><u>Drawing on experience from other heathlands across England facing similar threats, it is considered that this would be most effectively addressed by the establishment of a permanent, suitably-staffed wardening service that could focus on the management of people to ensure good behaviours are adopted. Whilst the specific wording is a matter for the Council, it is suggested that the addition of text which achieved the following purpose, added to sub-section (ii) of SS19/ST35, would allow this potential threat to be removed:</u></li> <li><u>'the introduction of an efficient wardening service that could supplement the work of existing landholders (including the MOD and Yorkshire Wildlife Trust) across the entire Common to present a physical presence on site and encourage good behaviours by the public.'</u></li> <li><u>This could be supplemented by the addition of the following text to the explanatory text:</u></li> </ul>

## ST35: Queen Elizabeth Barracks, Strensall

(Site ref: 934)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
			<p><u>'A recreational strategy physical presence on site could promote good behaviours by visitors, encouraging use of existing paths and ensuring dogs are properly controlled. The necessary costs would best be secured by an appropriate levy or similar on each development'.</u></p> <p><u>Other</u></p> <p>Within the site itself there are potential areas of ecological interest including protected species (bats, great crested newts, invertebrates) and potential areas of higher value habitat. The Preliminary Ecological Assessment undertaken on behalf of the landowner in March 2017 recommends further work is needed to fully assess the impacts on these biodiversity assets. <u>There is therefore a gap in detailed evidence for these assets to understand implications as a result of development.</u></p> <p>There are a good number of well established, high quality trees on site that the development should seek to preserve. At least all trees of category A and B, and any with a significant ecological value should be retained unless they pose an unreasonable restriction on development and their contribution to the public amenity and amenity of the development is very limited, and their loss is outweighed by the benefits and mitigation provided by the development.</p> <p><u>Scrub encroachment is a major threat to lowland heath and to manage this Strensall Common is managed under Environmental Stewardship using sheep and cattle grazing by an adjacent tenanted farmer. Interruption to this management regime or factors making it unviable could undermine the conservation objectives for the Common and have a potentially negative effect on the integrity of the site.</u></p> <p><del>In conclusion</del> <u>On balance, this site is scored as having a significant negative impact given the adjacency to the Strensall Common and outstanding issues in relation to ecological interest including protected species. given that Notwithstanding this, it is acknowledged that the HRA (2018) concludes that development is not likely to have adverse effects on the integrity of Strensall Common SAC. further evidence and Appropriate Assessment is required to fully assess the impacts on ecology both within the site boundaries and the neighbouring SAC /</u></p>

## ST35: Queen Elizabeth Barracks, Strensall

(Site ref: 934)

SA Objective	Sub-objective (Will the site...?):	Effect	Commentary*
			<p>SSSI: The <u>impact of development of this site will be contingent on limiting the significant negative impact on Strensall Common this objective.</u></p> <p><b>Mitigation</b></p> <ul style="list-style-type: none"> <li><del>• HRA states Appropriate Assessment is required</del></li> <li>• <u>Comprehensive evidence base is required to determine ecological issues <i>in relation to protected species and potential areas of higher value habitat in detail and produce a sufficient mitigation strategy.</i></u></li> <li>• <u>To satisfy the HRA, the addition of the following wording to sub-section (ii) of Policy SS19: 'the introduction of an efficient wardening service that could supplement the work of existing landholders (including the MOD and Yorkshire Wildlife Trust) across the entire Common to present a physical presence on site and encourage good behaviours by the public'.</u></li> </ul> <p><b>Assumptions</b></p> <ul style="list-style-type: none"> <li>• <u>That development would follow the mitigation hierarchy to avoid impacts then to mitigate unavoidable impacts, and, as a last resort, to compensate for unavoidable residual impacts.</u></li> <li>• <u>For hydrological impacts the shadow HRA produced on behalf of the site promoter is accurate and remains relevant.</u></li> </ul> <p><b>Uncertainties</b></p> <p><del>The outcome of Appropriate Assessment</del></p> <ul style="list-style-type: none"> <li>• <u>Alternative designs which avoid impacts and mitigation measures are to be determined through masterplanning. This creates uncertainty as to the scale and significance of any effects. The mitigation measures will need to be refined through the detailed planning application stage, including ecological receptor-specific evaluation.</u></li> </ul>



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# Appendix C

## Appraisal of policies against SA Objective 8 following update of the HRA

Where the revision to matrices requires the removal of text this is indicated using ~~strikethrough~~, where new text has been added this is underlined. Similarly where the score has been amended on a matrix this is also indicated using ~~strikethrough~~ for the previous score and underlining for the new score.

**Table C1 - Spatial Strategy policies SS13, SS18 and SS19 appraisal against SA Objective 8: Biodiversity and Green Infrastructure**

The matrix presents the appraisal for spatial strategy policies (SS13 to SS24) in the same manner as Appendix I of the SA Report (Feb 2018).

SA Objective	Spatial Strategy												Cumulative effect of the draft policies	Commentary on effects of each policy
	SS13: Land West of Elvington Lane	SS14: Terry's Extension Sites 1 and 2	SS15: Nestle South	SS16: Land at Tadcaster Road	SS17: Hungate	SS18: Station Yard, Wheldrake	SS19: Queen Elizabeth Barracks	SS20: Impfal Barracks	SS21: Land South of Elvington Airfield Business Park	SS22: University of York Fxnansion	SS23: Land at Northminster Business Park	SS24: Whitehall Grange		
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	<del>-?</del>	+	+	+	+	+	<del>?</del> <u>+/-</u>	+	+	+	+	+	<del>+/-?</del>	<p><b>Likely Significant Effects</b></p> <p>Notwithstanding greenfield land-take associated with new development (and hence potential loss or displacement of 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 as access enhancement generally. Under the guidance of a Green Infrastructure Strategy there is potential to enhance assets and access for the benefit of existing and future residents. Long term management of resources will be critical to ensure that improvements are sustainable.</p>

												<p><u>Within the Habitats Regulations Assessment (HRA) (April 2018) likely significant effects (LSE) could not be ruled out from SS13 because of anticipated increases in recreational pressure and impacts on the bird communities of the Lower Derwent Valley that also utilised land beyond the European site boundary. For SS18 LSE could not be ruled out because of anticipated increases in recreational pressure on the Lower Derwent Valley nearby. For SS19 LSE could not be ruled out in terms of the impact of recreational pressure on the adjacent Strensall Common.</u></p> <p><u>Following Appropriate Assessment, the adoption of mitigation measures including the provision and promotion of information on alternative recreational areas and wardening services, delivered by changes to policy wording was found to lead to the conclusion of adverse effects on the integrity of the site.</u></p> <p><u>Within the preliminary Habitats Regulations Assessment (HRA) Policy SS19 was found to cause a likely significant effect (LSE) alone across a range of factors on the adjacent Strensall Common. LSEs from recreational pressure cannot be ruled out. In addition, LSEs arising from possible hydrological effects and increased nitrogen disposition within the SAC arising from vehicle movements cannot be ruled out. 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.</u></p> <p><u>The adoption of appropriate mitigation could remove the potential for likely significant effects in relation to SS18. However, at this stage of the assessment, it was not found possible to mitigate policies SS13 or SS19 and these must be subject to an appropriate assessment. The HRA is iterative. Policy SS19 does set out the requirement for a visitor mitigation strategy to address recreational demands which, as far as it can at present, provides suitable mitigation in line with ongoing HRA work. In light of the outcome of the ongoing assessment in HRA, and because of these outstanding issues, the Plan must await the outcome of this further scrutiny in the HRA. However, in light of the residual effects on Heslington Tillmire SSSI, minor negative effects have been identified for Policy SS13. A mix of minor positive and negative effects have been assessed for SS19 in light of the broader beneficial aspects in relation to increasing access but that there are negative impacts. However, it is considered that policy wording helps to ensure that to some extent, these negative effects can be mitigated.</u></p> <p><u>Whilst the full effects can only be considered at the detailed planning application stage, the HRA of the housing policies and strategic sites indicates</u></p>
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**Table C2 - Thematic policy H1 appraisal against SA Objective 8: Biodiversity and Green Infrastructure**

The matrix presents the appraisal for thematic Housing policies (H1 to H10) in the same manner as Appendix J of the SA Report (Feb 2018).

SA Objective	Housing										Cumulative effect of the draft policies	Commentary on the effects of each policy*
	Policy H1 – Housing Allocations	Policy H2 – Density of Residential Development	Policy H3 – Balancing the Housing Market	Policy H4 – Promoting Self and Custom House Building	Policy H5 – Gypsy and Travellers	Policy H6 – Travelling Showpeople	Policy H7 – Student Housing	Policy H8 – Houses in Multiple Occupation	Policy H9 – Older Persons Specialist Housing	Policy H10 – Affordable Housing		
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	0	0	0	0	0	0	0	0	0	0	0	<p><b>Likely Significant Effects</b></p> <p>New housing developments could have adverse effects in relation to conserving or enhancing green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment if sited in inappropriate locations or without appropriate mitigation. However, other policies in the plan, notably SS1, DP1, DP2, GI1, GI2, GI3 and GI6 would help to ensure that the location of any proposed development will seek to conserve and enhance York’s natural environment including internationally, nationally and locally significant nature conservation sites and green corridors.</p> <p>Two of the proposed general housing allocation sites and four strategic allocation sites have been identified as being within 250m of Statutory designated nature sites e.g. SPA/SAC/SSSI/LNR and as such have been appraised as having a significant adverse effect. A number of the other sites allocated have been identified as being either within 500m of these statutory sites and/or in some cases within 250m of other sensitive (but not statutory) ecological designations including SINC and Areas of Local Nature Conservation. Whilst the full effects can only be considered at the detailed planning application stage, the HRA of the housing policies (at this stage) indicates that it is unlikely to have significant</p>



**Table C3 – Thematic policy EC1 appraisal against SA Objective 8: Biodiversity and Green Infrastructure**

The matrix presents the appraisal for thematic Economy and Retail section policies (EC1 to EC5 and RR1 to R4) in the same manner as Appendix J of the SA Report (Feb 2018).

SA Objective	Economy and Retail										Cumulative effect of the draft policies	Commentary on the effects of each policy
	EC1 – Provision of Employment Land	EC2 – Loss of Employment Land	EC3 – Business and Industrial Uses within Residential Areas	EC4 – Tourism	EC5 – Rural Economy	R1 – Retail Hierarchy and Thresholds	R2 – District and Local Centres and Neighbourhood Parades	R3 – York City Centre Retail	R4 – Out of Town Centre Retail			
8. Conserve or enhance green infrastructure, biodiversity, geodiversity, flora and fauna for accessible high quality and connected natural environment.	0	0	0	0	0	0	0	0	0	0	0	<p><b>Likely Significant Effects</b></p> <p>The development of the new employment land outlined in Policy EC1 could have adverse impacts on green infrastructure, biodiversity, geodiversity, flora and fauna without appropriate safeguards or mitigation plans. Similarly new tourism or retail development outlined in some of the other policies could also have adverse effects on local biodiversity depending on its location and proximity to conservation sites. The site assessments undertaken of the employment site allocations found that many of the sites are not within close proximity of any sensitive ecological designations. However two of the proposed general employment allocation sites (E10: Chessingham Park, Dunnington and E18: Towthorpe Lines) are within 250m of sensitive designations. E18 is within 250 of Strensall Common SAC and SSSI and E10 is within 250m of Hasscarr LNR. One of the strategic employment allocations is within 250m of Clifton Ings and Rawcliffe Meadows SSSI (ST5: York Central).</p> <p><del>The Habitats Regulation Assessment (HRA) screening assessment has determined that E18 will require appropriate assessment as</del></p>



# Appendix D

## Results of the Cumulative Effects Assessment following update of the HRA

Where the revision to matrices requires the removal of text this is indicated using strikethrough, where new text has been added this is underlined. Similarly where the score has been amended on a matrix this is also indicated using strikethrough for the previous score and underlining for the new score.

The matrix presents the appraisal of the policies for the draft Local Plan as whole in the same manner as Table 6.4 of the SA Report (Feb 2018).

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	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.

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	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	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 significant 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	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring		
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,

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	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	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 movements, increased fuel consumptions and energy use in new dwellings and premises.
8. Biodiversity	++	+/-/?	± 0	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



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	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	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.
11. Waste	+	+/-	+	+/-	0	?	+	0	0	+	0	++	0	+	+/-		It is anticipated that the policies of the draft Local Plan would have a mixed positive and

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	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	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

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	Climate Change	Environmental Quality and Flood Risk	Waste and Minerals	Transport and Communication	Delivery and Monitoring			
																	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.
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.



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