



YORK

CITY OF YORK
HERITAGE IMPACT APPRAISAL
(APRIL 2013)

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One Introduction

- 1.1 A 'heritage assets' approach is important at a site specific level to provide guidance about the sensitivity of a particular location, the overall pattern and profile of monuments and buildings, and indeed of other features such as historic parks and gardens. Whilst it is important to adopt such a heritage asset approach at this level, it cannot describe the significance and sensitivity of the wider historic environment, nor what elements of the city's character we should strive to protect or hope to strengthen. As such, in order to develop a sound basis for informed decision making a Heritage Impact Appraisal has been undertaken by officers from the Design, Conservation and Sustainable Development Team and the Integrated Strategy Unit.
- 1.2 The purpose of this Heritage Impact Appraisal is to assess whether the strategic sites and policies of the City of York Local Plan Preferred Options will conserve or enhance the special characteristics of the city. The *Heritage Topic Paper (April 2013)* considers existing evidence relating to the City of York's historic environment and how the evidence is translated into the Council's understanding of the city's special qualities and its complex 2000 year history. This evidence and understanding has then been used to identify six principle characteristics of the historic environment that help define the special qualities of York, providing a detailed explanation of each characteristic.
- 1.3 The historic and natural environment policy framework for the city is established by the Heritage Topic Paper and the six principle characteristics identified within in it, alongside the design and historic environment policies within the City of York Local Plan Preferred Options. These form the basis of this Heritage Impact Assessment.

Two Impact Appraisal

- 2.1 The traffic light colour coding set out below has been used in this Heritage Impact Appraisal. It is designed to give an indication of the potential impact of the Local Plan's sites and policies. A grey colour code has also been added to indicate a neutral impact.

Impact Key



Positive: Potential for positive benefit through enhancement as well as adding value.



Minor: Potential for harm to historic character and significances but identified policy framework in place to provide mitigation.



Serious: Highly likely to cause significant harm leading to loss of historic character or substantial harm to its significance.



Neutral: Negligible impact and negligible benefit

Sites

- 2.2 As part of the Council's desire to generate development opportunities within the City of York, the Council wrote to and emailed nearly 2,000 contacts from our Local Plan and Strategic Housing Land Availability Assessment database asking people to submit sites, which they thought had potential for development over the Plan period. The consultation ran for 6 weeks in autumn 2012 and generated around 300 individual site submissions from a variety of landowners, agents, developers and members of the public. These sites were then assessed along with others we previously knew about from the 2008 call for sites, Strategic Housing Land Availability Assessment and Employment Land Review, which were not resubmitted as well as outstanding planning permissions. In total, 723 parcels of land were considered.
- 2.3 As part of determining the most sustainable site allocations the sites were subject to a sustainable location assessment which is presented in the *Sustainability Appraisal (2013) (SA)* and the *Site Selection Technical Paper (2013)*. The methodology took into consideration all three aspects of sustainability (economic, social and environmental) in determining the best location for development. This was a desktop assessment using GIS based data to accurately determine the sites location relative to the criteria. The assessment followed a four stage criteria methodology to sieve out the most sustainable sites for consideration. All the sites were also subject to a supplementary assessment of environmental considerations to understand more about key assets or issues within the vicinity. This included assessing areas important to York's historic character and setting alongside York's heritage assets.

- 2.4 At the end of the four stage criteria methodology 156 sites were left which were then subject to consideration by specialist officers, including those in the Design and Conservation team, who provided comments on strategic sites (those over 5ha). As such, those sites considered to be highly likely to cause significant harm leading to loss of historic character or substantial harm to its significance (red in the colour coding system set out above) were removed from the site selection process as unsuitable sites. Through this process some site areas were also reduced to ensure that only suitable site areas were given further consideration in the selection process.
- 2.5 Conservation and enhancement of the historic and natural environment has therefore been a key component of the site selection process. This has ensured that the Local Plan only includes sites that have the potential for positive benefit through enhancement as well as adding value (green in the colour coding system), or sites that have the potential for harm to historic character and significances but the identified historic and natural environment policy framework in place will provide mitigation (amber in the colour coding system). Whilst exact, detailed mitigation is unknown at this stage it is considered that the use of detailed masterplanning, design briefs and/or design codes etc. (that implement the heritage policies set out in Section 16 of the Local Plan) to inform the development of the identified allocations will ensure that significant harm leading to loss of historic character or substantial harm to its significance can be avoided.

Policies

- 2.6 Each policy in the City of York Local Plan Preferred Options document has been assessed against the historic and natural environment policy framework as established by the Heritage Topic Paper and the six principle characteristics identified within in it, alongside the design and historic environment policies within the Local Plan Preferred Options. This assessment is presented in the tables overleaf.

Sustainable Development

Policy	Impact Appraisal	Comments	Mitigation
Policy SD1: Sustainable Development		The historic and natural environment is appropriately referenced in the policy	None required

Spatial Strategy

Policy	Impact Appraisal	Comments	Mitigation
Policy SS1: York Sub Area		The historic and natural environment is appropriately referenced in the policy.	None required
Policy SS2: Delivering Sustainable Growth for York		The historic and natural environment is appropriately referenced in the policy.	None required
Policy SS3: Spatial Distribution		There is potential for harm to historic character and significances through the development of the identified allocations as details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy SS4: Strategic Sites Development Principles		The historic and natural environment is appropriately referenced in the policy.	None required
Policy SS5: The Role of York's Green Belt		The historic and natural environment is appropriately referenced in the policy.	None required
Policy SS6: Safeguarded Land		There is potential for harm to historic character and significances through the	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the

Policy	Impact Appraisal	Comments	Mitigation
		development of the identified safeguarded land as the details of future development is not known at this stage.	development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan. Any development for temporary uses should also take into account the heritage policies.

York City Centre

Policy	Impact Appraisal	Comments	Mitigation
Policy YCC1: York City Centre		There is potential for harm to historic character and significances through the development of York City Centre, including the identified allocations, as details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.

York Central

Policy	Impact Appraisal	Comments	Mitigation
Policy YC1: York Central Special Policy Area		There is potential for harm to historic character and significances through the development of York Central Special Policy Area, including the identified allocations, as details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.

Economy

Policy	Impact Appraisal	Comments	Mitigation
Policy EMP1: Strategic Employment Locations		There is potential for harm to historic character and significances through the development of the strategic employment locations, as details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy EMP2: Provision of Employment Land		There is potential for harm to historic character and significances through the development of the indentified allocations, as details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy EMP3: Economic Growth in the Health and Social Care Sectors		There is potential for harm to historic character and significances, as details of future development of health and social care uses is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy EMP4: Loss of Employment Land		The Policy ensures that historic and natural environment policy framework is taken into account.	None required.
Policy EMP5: Business and Industrial Uses within Residential Areas		Proposals will only be permitted where they will not significantly harm the amenity of the surrounding area and the appearance of existing buildings will be approved. This ensures that historic and natural environment policy framework is taken into account.	None required.

Retail

Policy	Impact Appraisal	Comments	Mitigation
Policy R1: Retail Hierarchy		The Policy seeks to maintain and ensure the viability of the city centre, district and local centres. Main town uses will be directed to these centres which promotes local distinctiveness.	None required..
Policy R2: District Centres, Local Centres and Neighbourhood Parades		The policy seeks to enhance the function, vitality and viability of the district and local centres and neighbourhood shopping parades This promotes local distinctiveness. Further development in there locations will be considered acceptable if it does not have a significant detrimental impact upon local residents or the historic and natural environment which ensures that historic and natural environment policy framework is taken into account.	None required.
Policy R3: York City Centre Retail		There is potential for harm to historic character and significances through the development of the identified city centre retail allocations as details are not known at this stage.	Through detailed masterplanning/design briefs/design codes etc for allocations and the implementation of the heritage policies set out in Section 16 of the Local Plan.
Policy R4: Out of Centre Retailing		There is potential for harm to historic character and significances through the development of the indentified out of centre retail locations as details of future development is not known at this stage.	Through detailed masterplanning/design briefs/design codes etc for allocations and the implementation of the heritage policies set out in Section 16 of the Local Plan.

Housing Growth and Distribution

Policy	Impact Appraisal	Comments	Mitigation
Policy H1: The Scale of Housing Growth		Although the allocated sites have already been through an initial assessment which included impact on the historic and natural environment, and any unsuitable sites ruled out, there is still potential for harm to historic character and significances through the development of the identified allocations, as details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy H2: Existing Housing Commitments		The policy makes reference to the need for proposals to meet the requirements of the relevant policies in the Plan which ensures the historic and natural environment policy framework is taken into consideration.	None required.
Policy H3: Housing Land Allocations		Although the allocated sites have already been through an initial assessment which included impact on the historic and natural environment, and any unsuitable sites ruled out, there is still potential for harm to historic character and significances through the development of the identified allocations, as details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy H4: Density of Residential Development		The policy makes reference to the need for proposals to meet the requirements of Section 16 in the plan, as such this ensures that the historic and natural environment policy framework is taken into consideration.	None required.

Aiding choice in the Housing Market

Policy	Impact Appraisal	Comments	Mitigation
Policy ACHM1: Balancing the Housing Market		No impact or enhancement opportunities.	None required.
Policy ACHM2: Housing Mix		No impact or enhancement opportunities.	None required.
Policy ACHM3: Gypsy, Traveller and Showpeople Allocations		There is the potential for harm to historic character and significances through the development of the indentified allocations, as details of future development are not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy ACHM4: Sites for Gypsies, Travellers and Showpeople		As details of any development of sites for Gypsies, Travellers and Showpeople are not known at this stage there is potential for harm to historic character and significances.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy ACHM5: Student Housing		As details of any future student housing development is not known at this stage, as such there is the potential for harm to historic character and significances.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of any student accommodation. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy ACHM6:Houses in Multiple Occupation		The policy ensures that further HMO change of use must not have a detrimental impact on the historic environment and that particularly attention should be paid to the impact of further change of use in	None required.

Policy	Impact Appraisal	Comments	Mitigation
		conservation areas, as such this ensure that the historic and natural environment policy framework is taken into consideration.	

Affordable Housing

Policy	Impact Appraisal	Comments	Mitigation
Policy AH1: Affordable Housing		No impact or enhancement opportunities.	None required.

Community Facilities

Policy	Impact Appraisal	Comments	Mitigation
Policy CF1: Community Facilities		No impact or enhancement opportunities.	None required.
Policy CF2: Built Sports Facilities		No impact or enhancement opportunities.	None required.
Policy CF3: Childcare Provision		No impact or enhancement opportunities.	None required.
Policy CF4: Healthcare and Emergency Services		No impact or enhancement opportunities.	None required.

Education, Skills and Training

Policy	Impact Appraisal	Comments	Mitigation
Policy EST1: Preschool, Primary and Secondary Education		No impact or enhancement opportunities.	None required.
Policy EST2: Further and Higher Education		No impact or enhancement opportunities.	None required.
Policy EST3: Community Access to Sports and Cultural Facilities on Education Sites		No impact or enhancement opportunities.	None required.
Policy EST4: Targeted Recruitment and Training		No impact or enhancement opportunities.	None required.

Universities

Policy	Impact Appraisal	Comments	Mitigation
Policy U1: University of York Campuses		No impact or enhancement opportunities.	None required.
Policy U2:Heslington West		This policy is based on existing planning permission parameters at Heslington West and as such, historic and natural	None required.

Policy	Impact Appraisal	Comments	Mitigation
		environment considerations have been taken into account.	
Policy U3: Heslington East		This policy is based on existing planning permission parameters at Heslington East and as such historic and natural environment considerations have been taken into account.	None required.
Policy U4: Lord Mayor's Walk		The policy states that the design of any proposal for development and redevelopment at the campus should take into account the sensitive location of the campus, including it's listed buildings. As such historic and natural environment considerations have been taken into account.	None required.
Policy U5: York St. John University Allocations		Whilst the sites are considered suitable in principle in historic and natural environment terms there is still potential for harm to historic character and significances through the development itself.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of any student accommodation. This should implement the heritage policies set out in Section 16 of the Local Plan.

Design and the Historic Environment

Policy	Impact Appraisal	Comments	Mitigation
Policy DHE1: Design and Historic Environment		The historic and natural environment is appropriately referenced in the policy.	None required.

Policy	Impact Appraisal	Comments	Mitigation
Policy DHE2: Heritage Assets		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE3: Landscape and Setting		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE4: Building Heights and Views		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE5: Streets and Spaces		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE6: Conservation Areas		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE7: Listed Buildings		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE8: Shopfronts in Historic Locations		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE9: Advertisements in Historic Locations		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE10: Security Shutters in Historic Locations		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE11: York City Walls and St Marys Abbey Walls		The historic and natural environment is appropriately referenced in the policy.	None required.

Policy	Impact Appraisal	Comments	Mitigation
Policy DHE12: Archaeology		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy DHE13: Historic Parks and Gardens		The historic and natural environment is appropriately referenced in the policy	None required.
Policy DHE14: City of York Historic Environment Record		The historic and natural environment is appropriately referenced in the policy.	None required.

Green Infrastructure

Policy	Impact Appraisal	Comments	Mitigation
Policy GI1: Green Infrastructure		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy GI2: Biodiversity		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy GI3: Trees		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy GI4: Open Space and Playing Pitches		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy GI5: New Open Space		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy GI6: Green Corridors		The historic and natural environment is appropriately referenced in the policy.	None required.

Policy	Impact Appraisal	Comments	Mitigation
Policy GI7: Access to Nature		The historic and natural environment is appropriately referenced in the policy.	None required.

Green Belt

Policy	Impact Appraisal	Comments	Mitigation
Policy GB1: Development in the Green Belt		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy GB2: Development in Settlements "Washed Over" by the Green Belt		This policy seeks to protecting the scale and size of villages and as such historic and natural environment considerations have been taken into account.	None required.
Policy GB3: Reuse of Buildings		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy GB4: "Exception" Sites for Affordable Housing in the Green Belt		This policy seeks to protecting the scale and size of villages and as such historic and natural environment considerations have been taken into account.	None required.
Policy GB5: Major Developed Sites in the Green Belt		This policy seeks limited development at major developed sites within the Green Belt provided development does not prejudice the Green Belt's openness or its purposes.	None required.

Flood Risk Management

Policy	Impact Appraisal	Comments	Mitigation
Policy FR1: Flood Risk		No impact or enhancement opportunities.	None required.
Policy FR2: Surface Water Management		Context is important in relating to each individual proposal for surface water management. There may be the potential for harm to historic character and significances through the development.	Assessment required on a case by case basis to explore impact on the historic and natural environment.
Policy FR3: Ground Water Management		Context is important in relating to each individual proposal for surface water management. There may be the potential for harm to historic character and significances through the development.	Assessment required on a case by case basis to explore impact on the historic and natural environment.

Climate Change

Policy	Impact Appraisal	Comments	Mitigation
Policy CC1: Supporting Renewable and Low Carbon Energy Generation		The historic and natural environment is appropriately referenced in the policy.	None required.
Policy CC2: Sustainable Design and Construction		The historic and natural environment is appropriately referenced in the policy.	None required.

Environmental Quality

Policy	Impact Appraisal	Comments	Mitigation
Policy EQ1: Air Quality		The policy will improve the public's enjoyment of the historic and natural environment and its setting through better air quality; it also has the potential to reduce damage to the fabric of historic buildings from emissions.	None required.
Policy EQ2: Managing Environmental Quality		The policy requires that environmental impacts arising from development proposals are fully assessed which has the potential to enhance and improve the historic and natural environment and public's enjoyment of it.	None required.
Policy EQ3: Land Contamination		There may be the potential for potential for harm to historic character and significances through the remediation of contaminated land and impacts on archaeology.	Surveys where appropriate and archaeological recording as set out in Section 16 of the Local Plan.

Waste and Minerals

Policy	Impact Appraisal	Comments	Mitigation
Policy WM1: Sustainable Waste Management		Through this policy planning permission for waste facilities in appropriate sustainable locations will only be granted where it would not give rise to significant adverse impacts	None required.

Policy	Impact Appraisal	Comments	Mitigation
		on the historic and natural environment in accordance with other relevant policies in the plan. As such the historic and natural environment is appropriately referenced.	
Policy WM2: Safeguarding Mineral Resources and Local Amenity		Proposals for minerals development will only be permitted if they do not result in unacceptable adverse impacts on the historic or natural environment, thereby appropriately referencing the historic and natural environment.	None required.

Transport

Policy	Impact Appraisal	Comments	Mitigation
Policy T1: Location and Layout of Development		This policy has the potential to enhance and improve the city's historic character and significances but lacks specific reference to the importance of good design and the contribution of local character and there may be the potential for potential for harm to historic character and significances through this development.	Will need detailed design briefs and/or design codes etc. To inform the development of strategic public transport infrastructure. This should implement the heritage policies set out in Section 16 of the Local Plan.
Policy T2: Strategic Public Transport Improvements		This policy supports the implementation of strategic public transport infrastructure which has the potential to enhance and improve the historic and natural environment	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of strategic public transport infrastructure. This should implement the

Policy	Impact Appraisal	Comments	Mitigation
		and the public's enjoyment of it. However there may be the potential for potential for harm to historic character and significances through this development.	heritage policies set out in Section 16 of the Local Plan.
Policy T3: York Railway Station and Associated Operational Facilities		Any proposals to enhance the Listed Grade II* station that are sympathetic to its heritage, particularly those that improve the visual amenity at the station and its environs, to meet the demands of the modern rail customer will be support through this policy. As such the historic and natural environment is appropriately referenced.	None required.
Policy T4: Strategic Highway Network Capacity Improvements		No impact or enhancement opportunities	None required.
Policy T5: Strategic Cycle and Pedestrian Network Links and Improvements		This policy seeks to continue to develop a comprehensive network of safe and accessible strategic cycle and pedestrian routes, principally to connect residential areas with employment areas and retail areas as well as other facilities and services which has the potential to enhance and improve the public's enjoyment of the historic and natural environment. However there may be the potential for potential for harm to historic character and significances through this development.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of strategic cycle and pedestrian network links and improvements. This should implement the heritage policies set out in Section 16 of the Local Plan.

Policy	Impact Appraisal	Comments	Mitigation
Policy T6: Development at or Near Public Transport Corridors, Interchanges and Facilities		This policy refers to higher density, mixed-use development being permitted in locations close to existing or proposed public transport interchanges or facilities provided that the development does not have an adverse impact on the character, historic and natural environment and amenity of the area in the vicinity of the development. As such the historic and natural environment is appropriately referenced.	None required.
Policy T7: Demand Management		No impact or enhancement opportunities	None required.
Policy T8: Minimising and Accommodating Generating Trips		No impact or enhancement opportunities	None required.
Policy T9: Access Restrictions to More Polluting Vehicles		The policy will improve the public's enjoyment of the historic and natural environment and its setting through better air quality; it also has the potential to reduce damage to the fabric of historic buildings from emissions.	None required.
Policy T10: Protection for Residential Areas		This policy has the potential to enhance and improve the city's historic character and significances but lacks specific reference to the importance of good design and the contribution of local character and there may	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.

Policy	Impact Appraisal	Comments	Mitigation
		be the potential for potential for harm to historic character and significances through this development.	
Policy T11: City Centre Accessibility		This policy will support city centre proposals that reduce congestion, improve the journey time reliability of public transport and enhance the historic and natural environment, streetscape, safety and general environment of the city centre. As such the historic and natural environment is appropriately referenced.	None required.
Policy T12: Safeguarded Routes and Sites		There is potential for harm to historic character and significances through the development of the identified safeguarded land as the details of future development is not known at this stage.	Detailed masterplanning, the use of design briefs and/or design codes etc. to inform the development of the identified allocations. This should implement the heritage policies set out in Section 16 of the Local Plan.

Communications Infrastructure

Policy	Impact Appraisal	Comments	Mitigation
Policy CI1: Communications Infrastructure		This policy has the potential to enhance and improve the historic and natural environment, through controlling communications infrastructure development.	None required.

Infrastructure and Developer Contributions

Policy	Impact Appraisal	Comments	Mitigation
Policy IDC1: Infrastructure and Developer Contributions		This policy has the potential to enhance and improve the historic and natural environment and the public's enjoyment of it by seeking developer contributions to enhance the public realm.	None required.

Three Conclusion

- 3.1 The City of York Local Plan Preferred Options document is based on the Council's ambitious economic and housing growth agenda. However, as set out in section two above, there are no strategic allocations or policies of the Plan that have been identified to have a serious impact on the historic and natural environment i.e. that are highly likely to cause significant harm leading to loss of historic character or substantial harm to its significance. Despite the ambitious growth agenda of the Local Plan, the majority of its policies are considered to have the potential for positive benefit to the city's historic and natural environment through enhancement as well as adding value.
- 3.2 The impact appraisal has identified that where details of future development is unknown at this stage (allocations and safeguarded land) there is the potential for harm to historic character and significances. In these instances, mitigation through detailed masterplanning, the use of design briefs and/or design codes etc. should be implemented to inform future development. This should apply the historic and natural environment policy framework as established by the *Heritage Topic Paper (2013)* and the six principle characteristics identified within in it, alongside the design and historic environment policies within the City of York Local Plan Preferred Options. Through this mitigation it is recognised that the creation of new places offers the opportunity to deliver a new era of architecture, representing a new layer of development of which the city can be proud.
- 3.3 For an assessment of the cumulative impacts of the strategic sites and preferred policy approaches in the Local Plan on the historic and natural environment please see the *Sustainability Appraisal (2013)*.